



Texas AI Compliance First-Pass Checklist

A TRAIQA Readiness Tool for Texas Employers and Public-Serving Organizations

Mark each item your organization can confirm. Count the risk flags at the end. This is a practical first-pass review tool — not a substitute for legal advice.

Section 1 — AI Tool Inventory	Section 2 — Use-Case Classification
<ul style="list-style-type: none"> ■ Tool name, vendor, department, and internal owner ■ Purpose; optional or required; free, paid, or embedded ■ Formally approved? Covered by contract or DPA? <li style="background-color: #fff9e6;">■ No one owns the tool internally <li style="background-color: #fff9e6;">■ Vendor added AI features without review <li style="background-color: #fff9e6;">■ Employees using public AI tools with org data 	<ul style="list-style-type: none"> ■ Applicant-, employee-, consumer-, patient-, or public-facing? ■ Hiring, screening, performance, discipline, or documentation? ■ Surveillance, monitoring, security, or identity verification? <li style="background-color: #fff9e6;">■ AI influences a decision about a person <li style="background-color: #fff9e6;">■ AI touches biometric data or communicates with the public <li style="background-color: #fff9e6;">■ AI output is used without human review
Section 3 — Human Review & Decision Authority	Section 4 — Employment & HR Risk
<ul style="list-style-type: none"> ■ Who reviews the AI output? Who has final decision authority? ■ Can the reviewer override? Is the override process documented? ■ Are supervisors trained? Can the organization explain the decision? <li style="background-color: #fff9e6;">■ The AI tool effectively makes the decision <li style="background-color: #fff9e6;">■ No documented override process <li style="background-color: #fff9e6;">■ Employees rely on AI summaries without checking source material 	<ul style="list-style-type: none"> ■ AI used in job postings, resume screening, or candidate ranking? ■ AI used in performance, corrective action, or termination docs? ■ AI used in scheduling, promotion, or compensation decisions? <li style="background-color: #fff9e6;">■ AI influences employment decisions without a human standard <li style="background-color: #fff9e6;">■ Supervisors use AI-generated documentation without verifying facts <li style="background-color: #fff9e6;">■ Organization cannot explain the job-related basis for the decision
Section 5 — Biometric Data	Section 6 — Disclosures
<ul style="list-style-type: none"> ■ Facial geometry, fingerprints, voiceprints, or retina scans? ■ Consent process, storage location, retention, and destruction? ■ Vendor access and secondary use limitations documented? <li style="background-color: #fff9e6;">■ Consent assumed because image is publicly available <li style="background-color: #fff9e6;">■ Biometric data used for new purpose after collection <li style="background-color: #fff9e6;">■ Vendor terms allow broad training or secondary use 	<ul style="list-style-type: none"> ■ Public chatbots, government tools, or healthcare AI in use? ■ Disclosure: clear, conspicuous, plain-language, not buried? ■ Available before or at the time of interaction when required? <li style="background-color: #fff9e6;">■ Public interacts with AI without knowing it <li style="background-color: #fff9e6;">■ Disclosure is buried in terms or written in legalese
Section 7 — Vendor & Contract Review	Section 8 — Documentation & Cure Readiness
<ul style="list-style-type: none"> ■ Does vendor use org data to train the model? Can you opt out? ■ Can vendor explain the tool, provide logs, and support investigations? ■ Security controls, data retention, and post-termination terms reviewed? <li style="background-color: #fff9e6;">■ Vendor says 'compliant' without explaining why <li style="background-color: #fff9e6;">■ Contract allows broad reuse of organization data <li style="background-color: #fff9e6;">■ No one internally has reviewed the vendor's AI terms 	<ul style="list-style-type: none"> ■ Can you show AI inventory, tool owner, purpose, and affected population? ■ Human review process, vendor docs, policies, and training records? ■ Corrective action steps and what changed after a problem was found? <li style="background-color: #fff9e6;">■ No policy on AI use or record of human review <li style="background-color: #fff9e6;">■ No correction process; cannot reconstruct who used the tool or why

0–3 Risk Flags	4–8 Risk Flags	9+ Risk Flags
Low immediate exposure. Formalize inventory and ownership.	Moderate exposure. Prioritize documentation, vendor review, and human decision standards.	High exposure. A structured AI governance review is recommended.

If your checklist shows multiple risk flags, schedule a no-cost AI governance clarity call. We will help you identify whether your issue is a policy gap, vendor gap, documentation gap, supervisor-use problem, or decision-risk problem.