

DEPARTMENT: Office of the Dean
NAME: Data and Artificial Intelligence Governance Overview
POLICY NUMBER:
OWNER: Office of the Dean
EFFECTIVE DATE: 04.01.2026

SCOPE

This policy applies to all Meritus School of Osteopathic Medicine (MSOM) employees, students, trainees, internal and external academic partners, and research collaborators.

PURPOSE

To establish a comprehensive governance framework for the management of Meritus School of Osteopathic Medicine (MSOM) data across its full lifecycle within Artificial Intelligence (AI) research and application environments. This framework is designed to enable responsible and efficient innovation while ensuring compliance with all applicable privacy, security, and regulatory requirements, including, but not limited to, the Family Educational Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA).

The framework promotes data stewardship, ethical AI use, transparency, and accountability in alignment with institutional policies and applicable federal and state laws.

POLICY

- A. Four Pillars of Our Work: Our framework is built on four essential pillars that support the entire data-to-AI lifecycle.
 - 1. Ethical Oversight & Algorithmic Fairness
 - a. Bias Mitigation: Regular auditing of training datasets to promote diverse representation (race, gender, socioeconomic status) to mitigate data bias.
 - b. Explainability (XAI): Requirement for "Human-in-the-loop" checkpoints, especially for AI used in student data.
 - 2. Data Quality & Integrity
 - a. Standardization: Adopting encryption or equivalent Common Data Models to ensure data used for AI is interoperable and has high fidelity.

- b. Lineage Tracking: Maintaining a "provenance record" for every dataset to track its origin and transformations.

3. Privacy & Security

- a. De-identification: Implementing advanced differential privacy and synthetic data generation for research training and academic datasets.
- b. Access Control: Role-based privileges (RBA) are assigned based on clearly defined academic and operational roles, ensuring least privilege access. Granted roles may experiment, validate models, and test hypotheses within controlled environments, but cannot modify or access production systems or sensitive institutional data.

4. Data Owners & Stewards

- a. Data Sovereignty: Defining clear ownership of data generated by faculty, students, and affiliated hospital systems.
 - i. Data Owners: Institutional departmental leads who are accountable for relevant data domains (e.g., Student Affairs, Academic Affairs, Research, etc.) and responsible for determining how data may be used, shared, and retained. Approve access, define permissible use cases, and ensure compliance with institutional and legal obligations.
 - ii. Data Stewards: Operational custodians responsible for maintaining data quality, integrity, metadata standards, and policy enforcement. Maintains data classification and alignment with governance policies.
- b. Lifecycle Management: Establishing policies for AI models and the data training sets.

B. Leadership & Oversight

1. Membership

- a. Members are appointed by the Dean
- b. Membership is reviewed annually
- c. Vacancies are filled by the Dean's appointment

C. Data & AI Governance Committee

- 1. Dean
- 2. Chief Legal/Compliance Officer
- 3. Chief Information Officer
- 4. Associate Dean of Academic Affairs

5. Associate Dean of Student Affairs
6. Associate Dean of Research
7. Associate Dean of Clinical Education
8. Associate Dean of Graduate Medical Education/DIO
9. Assistant Dean of Admissions and Student Affairs
10. Data Officer and Committee Chair
11. Director of Assessment and Accreditation

Cadence: Meets monthly or as required for critical decisions, maintaining a majority quorum.

Documentation: Minutes are maintained and archived as institutional records.

D. Compliance & Reporting

1. Quarterly Reports
 - a. Data quality metrics, policy compliance, AI/ML project status, access requests, and incidents.
 - b. Reviewed by the committee and submitted to the Dean.
2. Annual Review
 - a. Policy updates, governance effectiveness, AI/ML outcomes, and audit results.
 - b. Presented to the Dean's Cabinet
3. Ad-hoc Reporting
 - a. Immediate reporting of data breaches, policy violations, or significant AI/ML model failures to the Governance Committee.

PROCEDURE

A. Clean Information (The Input)

1. Focus: Managing data availability, usability, integrity, and security in accordance with internal departmental standards.
2. Key Elements: Data quality, access, security, and privacy.
3. Operational Hygiene: Establishing clear ownership and stewardship across all domains.

4. The Goal: Trusted data that provides informed, decisive decisions and/or prevents breaches.

B. Reliable Decisions (The Output)

1. Focus: Managing the ethical use of data, including AI/ML models, to promote bias mitigation and explainability.
2. Key Elements: Fairness, robustness, safety, and accountability.
3. Operational Hygiene: Continuous tracking of "model drift" to ensure accuracy as new educational data arrives.
4. The Goal: Safe, ethical, and effective AI that maintains patients', students', and trainees' confidentiality.

C. Strategic Goals & Pillars

1. Strategic Goals

- a. Trustworthy AI: Promote all clinical and academic algorithms are transparent, explainable, and identify and mitigate bias.
- b. Data Liquidity: Promote institutional data integration by harmonizing academic performance data across systems to improve transparency, reporting, reduce fragmentation, and enhance analytical insight, including but not limited to standardized data definitions, cross-platform interoperability, and enterprise analytics enablement.
- c. Regulatory Resilience: Proactively govern compliance as AI-specific regulations evolve in academia, healthcare, and business sectors.
- d. Operational Efficiency: Automate data curation and labeling to accelerate the AI pipeline.

D. Core Functions

1. Policy & Strategic Oversight

- a. Enforcement: Establish and enforce data governance policies for all AI and analytics initiatives.
- b. Policy Approval: Approve data policies, standards, and classification models to ensure institutional consistency.
- c. Institutional Alignment: Align all data strategies with the institution's mission and broader digital strategy.
- d. Governance Maintenance: Review and update all governance policies annually or as necessitated by regulatory shifts.

2. Project & Ethical Approval
 - a. AI/ML Gatekeeping: Approve all new AI/ML projects and data initiatives before implementation begins.
 - b. Ethical Guardrails: Oversee the ethical use of data, specifically ensuring bias mitigation and Explainability in AI models.
 - c. Compliance Review: Ensure all projects comply with applicable federal, state, local, and institutional requirements, including but not limited to IRB, NIH, and FDA.
 - d. Cross-Domain Management: Address and reconcile challenges across clinical, academic, and research data domains to enable secure, interoperable, and efficient data liquidity across the institution.
3. Data Integrity & Quality Control
 - a. Standards Oversight: Prioritize and oversee projects aimed at improving data quality and interoperability.
 - b. Accuracy Assurance: Ensure data quality, accuracy, integrity, and accessibility are maintained across the institution.
 - c. Infrastructure Oversight: Oversee institution-wide data initiatives and information systems.
4. Compliance, Monitoring & Audit
 - a. Active Monitoring: Continuously monitor data security, access controls, and the entire data lifecycle management process.
 - b. Audit Authority: Conduct periodic audits of access logs, research data usage, and third-party data exchanges.
 - c. Performance Tracking: Review data quality performance and ensure policy compliance across all domains.
 - d. Reporting: Evaluate quarterly reports on project status, access requests, and incidents for the Dean's review.
- E. The AI Data Lifecycle (Pragmatic Workflow): Every AI project must follow this gated process to move from concept to deployment
 1. Intake & Classification: Review data sensitivity and classify the AI system based on its potential impact and risk level.
 2. Sourcing & Cleaning: Perform automated validation against institutional quality standards.
 3. Model Training (The Sandbox): Utilize secure, isolated environments with monitored data egress.

4. Validation & Bias Audit: Obtain formal sign-off from the committee.
 5. Deployment & Monitoring: Conduct continuous tracking of model drift and accuracy
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POLICY MANAGEMENT

The Office of the Dean owns this policy and provides final oversight.

The Data and AI Governance Committee Chair, in consultation with Academic Affairs, Student Affairs, Clinical Education, Graduate Medical Education, Research, Chief Information Officer, Chief Legal Counsel, and the Office of the Dean, is responsible for the operational development, maintenance, and periodic updating of the Data and AI Standards.

This policy will be reviewed annually and maintained in the electronic policy management system.

Questions regarding this policy should be directed to the Office of the Dean.