



AI Tool Evaluation: Quick-Start Guide for Small Districts

Introduction

This guide summarizes the most critical questions from the AI Implementation Checklist. It is designed for small districts that may not have a full IT team or formal review process. You do not need to answer every question perfectly. The goal is to make a reasonable, documented decision before a tool reaches students or staff.

If a vendor cannot answer any of these questions affirmatively and provide documentation, it is recommended that you pause your plans and seek additional help in your evaluation. Your local county office of education may be able to assist, or someone from the CITE member community may be a helpful partner should you need help clarifying any outstanding questions.

1. Understand What the Tool Is

Before anything else, know what you are evaluating. Is this a publicly accessible tool anyone can sign up for, an enterprise platform with district-level controls, or AI functionality embedded in a product you already use? The answer changes how much control you have and how much risk you are taking on.

Ask the vendor:

- ☐ What data does the tool collect, including prompts, uploads, and usage metadata?
- ☐ Is student personally identifiable information (PII) collected?
- ☐ Is district data used to train or improve the vendor's AI model? Can the district opt out in writing?
- ☐ How long is data retained, and can the district request permanent deletion?
- ☐ Does the vendor share data with subprocessors, and are those subprocessors contractually bound to the same protections?

2. Know What Data the Tool Collects

AI tools often collect more than traditional software — including the content of prompts, uploaded documents, and detailed usage patterns. Districts need to know what is collected, how long it is kept, and whether it is used to train the vendor's AI system.

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3. Confirm You Can Manage Access

A tool the district cannot centrally manage is a tool the district cannot secure. At minimum, you need to be able to add and remove users without relying on individual accounts tied to personal email addresses.

Ask the vendor:

- ☐ Does the tool support Single Sign-On (SSO) with Google, Microsoft, or your district identity provider?
- ☐ If SSO is not supported, does it support Multi-Factor Authentication (MFA)?
- ☐ If neither SSO nor automated provisioning is available, can accounts be created in bulk via CSV or SFTP?
- ☐ Can accounts be deactivated immediately when a staff member or student leaves the district?
- ☐ Can access be restricted to district networks or approved locations?
- ☐ Does the tool require personal email addresses or phone numbers to create accounts?

4. Review the Contract and Privacy Agreement

Verbal assurances do not protect your district. Key protections must be in writing — either in a Data Privacy Agreement (DPA), the California NDPA, or the contract itself.

Confirm in writing:

- ☐ Will the vendor sign the district's DPA or the CA-NDPA?
- ☐ Does the contract state that the district retains ownership of its data?
- ☐ Does the contract prohibit the sale of student data?
- ☐ Does the vendor comply with FERPA, COPPA, and SOPIPA?
- ☐ Is there a defined breach notification timeline consistent with district policy?
- ☐ Does the vendor have a documented incident response process?

5. Check for Advertising and Commercial Data Use

Some AI tools are funded by advertising or rely on user data for commercial purposes. This is especially concerning for student-facing tools.

Ask the vendor:

- ☐ Does the tool display advertising to students or staff?
- ☐ Is district data used for targeted advertising or behavioral profiling?
- ☐ Is data shared with third parties for marketing purposes?
- ☐ Does the contract explicitly prohibit the sale or commercial reuse of student data?

6. Assign Ownership and Set a Minimum Review

Small districts cannot sustain formal governance programs. That is not the expectation. What matters is that someone owns the responsibility and there is a plan to revisit approved tools over time. AI tools can change; models get updated, features get added, vendor policies shift. Approval is not permanent.

Before approving any tool:

- ☐ Assign a specific person or team responsible for AI oversight. This does not require a committee.
- ☐ Commit to reviewing approved tools at least once a year, even informally.
- ☐ Make sure staff know who to contact if they encounter a problem.
- ☐ Confirm the vendor notifies the district before making significant changes.
- ☐ Limit initial deployment; start with staff or a pilot group before broad student access.

7. Evaluate Safety for Instructional Use

AI tools generate content, not facts. Outputs can be inaccurate, biased, or inappropriate. Before any student-facing deployment, confirm that safeguards exist and that staff understand the tool's limitations.

Ask the vendor:

- ☐ Does the tool use content filtering to block inappropriate outputs?
- ☐ Does the vendor clearly state that outputs may be inaccurate and should be reviewed?
- ☐ Is the tool designed for K-12 use, and are there additional safeguards for younger students?
- ☐ Can teachers monitor student activity and restrict or guide student AI interactions?
- ☐ Is there a clear process for staff to report harmful or inappropriate outputs?

Special Thanks

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