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ILO Group

Adaptive Governance for AI in K-12:

Organizing for a Competency, Not a Tool

Executive Summary

Generative AI has prompted a new rush to adopt technology in K-12, mirroring the early days of the 1:1 device revolution. State Education Agency leaders, Superintendents, Chief Information Officers, Chief Technology Officers, and School Boards face competing demands: policymakers worried about children being left behind, educators and students already using tools without guidance, vendors promising transformation, all while ensuring student safety and data privacy.

Yet this pressure arrives against a backdrop of deep skepticism. Cell phone bans and serious concerns about youth wellbeing have created an impossible mandate to innovate faster and lock the devices away.

The rush to adopt and the attempt to pause are both false choices. This white paper argues that AI is not a tool to be purchased; it is a core organizational competency to be intentionally developed and governed. That distinction changes how organizations should think about governance, distribute leadership responsibility, and develop the capabilities needed to deliver this competency in practice. In support of that effort is a framework for Adaptive Governance: an approach that enables districts and states to make strategic, tactical, and operational decisions in response to evolving context, technological capabilities, and evidence of what works.

Why AI Demands a Different Kind of Governance

Traditional technology governance follows a “Procure and Protect” model. A tool is vetted, a contract is signed, an Acceptable Use policy is developed, and leadership moves on.

AI breaks this model because it is probabilistic, not deterministic. While a worksheet always looks the same, an AI tutor might explain fractions differently to every student. Capabilities evolve monthly, and new use cases emerge from classrooms before the central office knows the tool exists.

This is why AI is better understood as a competency than a tool. Like literacy or data analysis, it cuts across functions, evolves over time, and requires ongoing development rather than one-time deployment. Organizations don’t “implement” literacy; they build capacity and judgment continuously. AI demands the same institutional maturity.

Traditional governance, built around fixed policies and annual planning cycles, either moves too slowly to capture benefits or too blindly to mitigate risks. Adaptive Governance is the alternative: context-responsive, evidence-informed, and iterative.

Leaders should expect AI adoption to follow a curve, not a straight line. Even after a leader sets a clear vision, uncertainty rises before capability does: staff experiment unevenly, usage is inconsistent, and leaders feel pressure to either clamp down, slow down, or overbuy. That turbulence is not proof of failure; it is a sign of a predictable dip that comes with building a

new institutional competency. Governance can shorten the dip and accelerate the climb by creating fast, repeatable cycles for decision-making, piloting, learning, and course correction as capabilities evolve month to month. Governance should plan for this ramp explicitly, with early wins in low-stakes use cases and clear milestones for when the system should start to climb with greater confidence.

The Case For and Against a Chief AI Officer ("CAIO")

The Case For: Breaking the Triple Veto

Across districts and states, many promising AI efforts are derailed by a "Triple Veto" environment. IT departments cite security risks, legal teams raise privacy concerns, and curriculum leaders delay action while awaiting state guidance. That guidance is often slow to emerge, as states proceed cautiously to avoid missteps. Each department acts reasonably within its mandate, but the cumulative effect is paralysis, while teachers and students adopt tools on their own, without safeguards.

A Chief AI Officer is structurally able to synchronize these silos. When a tool requires security review, privacy analysis, and pedagogical evaluation, someone needs the mandate to convene all three conversations, balance risk and reward, and drive toward a decision.

A Chief AI Officer also provides centralized accountability.

When a board member asks, "Is our AI biased?" or a parent asks, "Are students protected from deepfakes?", organizations need one person who can answer, not three departments pointing at each other.

The Case Against: The Silo Risk

For some districts and states, a dedicated Chief AI Officer can become its own silo, a strategist disconnected from classroom reality. If the role sits purely in technology, the person occupying it may miss the pedagogical shifts AI requires. If the role sits in academics, the leader may lack essential technical depth.

There's also a resource question. Most districts and states can't afford a new cabinet position, and creating one by stripping responsibilities from existing roles often generates dysfunction.

Here's the central tension: many experts argue against AI silos, yet recommend dedicated leadership that could easily become one. The contradiction reveals an important truth: the risk isn't in creating the role, it's in how it is designed and integrated. The title matters less than the mandate: someone with cross-functional authority to bridge the network and the classroom.

To prevent AI leadership from becoming the next bottleneck, the CAIO's job is to build the operating system, not to own every decision. The role sets up the intake process, defines risk tiers, establishes a pilot cadence, and drives transparency, then intentionally pushes execution to the functional

owners in academics, operations, IT, and school leadership. Accountability stays centralized through the governance system, but implementation is distributed across the organization.

As AI becomes embedded in everyday work, both the CAIO role and the governance structures should evolve. When procurement routinely vets for data sovereignty and security, and curriculum teams can independently run and evaluate AI-enabled pilots, the oversight model should shift from hands-on approvals to guardrails, monitoring, and continuous improvement.

Building adaptability into teams from day one is essential so the system stays durable without becoming rigid.

Laying the Groundwork

Before deciding on a governance model, and regardless of which model is ultimately chosen, certain foundational work must happen. Without a clear vision, governance becomes process without purpose. Once the vision is clear, this work will likely be led by existing technology leadership in partnership with cabinet, but it is not the exclusive domain of any single role. It creates the conditions for any governance structure to succeed.

Define and prioritize AI-driven ROI. Convene cabinet leadership to identify organizational pain points. Map existing data against these constraints. Research AI solutions with documented evidence of efficacy in similar contexts. Understanding the instructional return on investment is particularly important for educators and classroom-based use cases. Select one or two high-priority use cases and stick to the learning agenda around these and stay disciplined to avoid having too many pilots happening at once. Pre-commit to what evidence triggers expansion versus shutdown and treat the first six months as capacity building, not maximizing your return on investment.

Audit the existing tech stack. Review contracts and licenses from the past three years. Survey department heads on actual usage. Identify shelfware (products with <20% adoption) and map redundancies. This often reveals budget items that can be redirected toward AI priorities.

Plan for integration. Document current authentication and rostering systems. Identify which core systems (SIS, LMS, HR) new tools must integrate with. Establish technical requirements and build a vendor integration checklist for procurement.

Optimize for safety. Review privacy laws with legal counsel. Map data flows: what student data exists, where it lives, who accesses it, and how it can be used and by whom. Establish AI risk tiers (no student data / anonymized / identifiable) with different vetting requirements for each. Create incident response protocols and auditing protocols upfront.

These structures create space for questions and focused re-review of decisions and outcomes, normalizing the need for staff to ask questions and review assumptions. If we explicitly invite questions early and often, we can surface misunderstandings before they turn into policy fights, risky tool use, negative outcomes, or misaligned expectations.

This groundwork serves two purposes: it prepares the organization for AI adoption, and it reveals which governance model fits. An organization that discovers significant technical complexity and available budget during this process may lean toward dedicated leadership; one that finds modest complexity and constrained resources may opt for distributed coordination.

Strategic Abandonment: Creating Capacity for AI

AI cannot be layered onto already-overwhelmed staff. Within the first 60 days of launching AI governance, districts and states should identify one to three strategic abandonment moves that create real time and budget capacity, and assign an owner to deliver them. Strategic abandonment means deliberately stopping low-impact work to create capacity for transformation. Every approved AI pilot should name what will be paused, consolidated, or automated to fund the attention it will require.

Examples include:

- **Consolidating redundant reports:** AI dashboards can replace multiple manual reports containing overlapping information.
- **Sunsetting underutilized programs:** Programs serving few students or showing limited impact can be phased out, freeing resources for AI-enabled alternatives.
- **Streamlining committees:** Multiple committees addressing related issues can be combined, with AI helping synthesize input.
- **Automating low-value tasks:** Manual attendance tracking, basic scheduling, and routine communications can be automated.

Without strategic abandonment, AI becomes another initiative. With it, AI becomes a catalyst for genuine transformation. Scaling will not reduce work; it will change the job and this will demand intentional reallocation.

Adaptive Governance Must Be Based on Context and Decisions

Assessing Your Context

Whether hiring a dedicated CAIO or assigning AI leadership to existing roles depends on three factors:

Factor	Questions to Ask
Technical Complexity	How many systems require integration? Do legacy systems complicate adoption? Are major transitions planned?
Available Budget	What's your technology budget as a percentage of operating costs? Can you reallocate from underutilized tools? Is grant funding available?
Staff Bandwidth	Do current staff have AI or data privacy expertise? Are leaders already at capacity? Can you dedicate 25% to 40% of a senior leader's time?

The Risks Governance Must Address
Adaptive Governance isn't just about enabling innovation, it's about protecting students and communities from harms that traditional technology governance wasn't designed to anticipate.

Algorithmic bias: AI systems trained on historical data can reflect historical inequities. Without deliberate auditing, districts and states may adopt or support tools with higher error rates for neurodivergent students or English Language Learners, or assessment tools that systematically disadvantage certain populations.

AI-generated disinformation: Convincing deepfakes are now accessible to anyone with a device. In Pikesville, Maryland, an AI-generated audio clip of a principal making racist remarks destabilized an entire school community before it was identified as fake[1]. Districts and states need authenticity protocols before a crisis hits, not after.

Data sovereignty: Many AI tools improve by training on user data. Without explicit contractual prohibitions, student interactions could feed commercial model development. Governance must ensure someone is asking what happens to data once it enters an AI system.

These risks don't argue against adoption. They argue for governance structures capable of identifying and managing them continuously.

[1] Ivan Pereira, "Baltimore High School Athletic Director Used AI to Create Fake Racist Audio of Principal: Police," *ABC News,* April 25, 2024, https://abcnews.go.com/US/baltimore-high-school-athletic-director-ai-create-fake/story?id=109638535

Clarifying Decision Rights

Not all AI decisions require Board approval; not every vendor question needs Cabinet input. Adaptive Governance distinguishes three tiers:

Level	Focus	Example Decision
Strategic (Cabinet/ Board)	The "Why" and "If"	"We will prioritize AI for administrative efficiency over instruction until evidence of learning impact strengthens."
Tactical (Directors/ Working Groups)	The "How" and "Who"	"We'll pilot AI feedback in 10th-grade English for one semester before expanding."
Operational (IT/ Curriculum)	The "What"	"This tool requires manual CSV uploads weekly. Does that fit our workflow?"

This framework applies across all three governance models. The tiers stay constant; the staffing adapts to context.

When AI governance stalls, leaders often jump to interpersonal explanations and personal team member dynamics. Adaptive Governance starts with the structure and norms that prevent paralysis and attributing problems to individuals.

There are six norms that leaders should make explicit:

1. **One shared priority per cycle**: Identify 1 to 2 problems to solve, not a list of tools to buy.
2. **One standard intake**: Every request should include the use case, data involved, intended users, and a proposed success measure.
3. **Risk tiers first**: Assign a risk tier before debating vendors or pilots.
4. **Decision timeline**: Set a default timeline for decisions so governance is not delayed.
5. **Named decision owner**: Each pilot has one accountable owner who reports results and recommends to scale, revise, or stop.
6. **Monthly review:** Review what was approved, denied, learned, and changed in policy, training, research, or procurement.

These norms reduce the "Triple Veto" effect by making cross-functional collaboration predictable rather than person-dependent and support the goal of starting with structure to avoid landing with blame.

Adaptive Governance should include an explicit escalation path. When a decision stalls, the working group escalates together to a named executive decision-maker on a fixed timeline. This prevents slow drift, reduces conflict, and reinforces that governance exists to decide, not delay.

Three Models for Organizing AI Leadership

Model A: Dedicated Leadership

The organization treats AI as a strategic pillar requiring full-time, cabinet-level leadership.

- **Strategic Tier — Chief AI Officer:** Reports to the Superintendent or Commissioner. Aligns AI strategy with goals, works with the Board on funding and long-term vision, serves as a single point of accountability.
- **Operational Tier — Director of AI Implementation:** Manages deployment, vendor vetting, and professional learning. Ensures day-to-day operations match cabinet strategy.
- **Tactical Tier — Cross-Functional Working Group:** Teachers, IT, curriculum specialists, special education, family engagement, legal. Conducts pilots, provides ground-level feedback, identifies barriers.

- *Fits:* Substantial technology budget, complex integration, board commitment to AI as priority.
- *Risk:* CAIO isolation from classroom reality and instructional outcomes.
- *Antidote:* Structured working group feedback and regular school presence.

Model B: Integrated Leadership

AI leadership is assigned to an existing senior role with dedicated operational support.

- **Strategic Tier — CTO, COO, or CAO:** Provides strategic direction and budgetary authority. Approves strategy, secures funding, and represents AI initiatives to the Board.
- **Operational Tier — Director of Innovation or Instructional Technology:** Sits at the intersection of instruction and operations, not solely in IT. Translates between technical and pedagogical requirements. Designs pilots, drafts acceptable use frameworks.
- **Tactical Tier — Cross-Functional Working Group:** Teachers, IT, curriculum specialists, data privacy officer. Tests tools, provides feedback, identifies implementation barriers.

- *Fits:* Moderate budget, existing director who can absorb AI coordination.
- *Risk:* "Full plate" problem, AI gets attention only during crises.
- *Antidote:* Protected time, clear processes, routines, and expectations.

Model C: Distributed Leadership

The Superintendent or Commissioner assembles a working group and designates one point person to coordinate.

- **Strategic Tier — Superintendent:** Retains final decision authority. Sets priorities, approves budget, escalates policy questions to the Board.
- **Operational Tier — Point Person (Assistant Superintendent or Director):** Dedicates 25% to 40% time to AI coordination. Maintains project tracker, convenes monthly working group meetings.
- **Tactical Tier — Distributed Working Group:** Subgroups handle specific workstreams (procurement, professional learning, student voice). Conducts research, pilots tools, reports progress.

- *Fits:* Limited budget, modest technical complexity.
- *Risk:* Diffusion of responsibility.
- *Antidote:* Explicit coordination assignment and regular meetings with dedicated time set-aside. Leverage regional resources.

When to Move Up a Model

Districts and states should monitor fidelity of implementation to the existing model. While a model change is not appropriate if the problem rests with implementation, districts and states should revisit their governance model when any of these appear:

- Tool demand outpaces decision speed: requests pile up and decisions slow, increasing unsanctioned use.
- Integration complexity increases: more core systems require authentication, rostering, or data sharing.
- Risk exposure rises: more student-facing tools, more incidents, or heightened community scrutiny.

When issues such as these emerge, the right response is often a shift from a Model, such as C to B or B to A, not more process inside the current structure.

(Model A)

Case Study: Charlotte-Mecklenburg Schools

With 180+ schools and over 140,000 students, Charlotte-Mecklenburg fits the Model A profile: significant scale, technical complexity, and board-level commitment to AI as a strategic priority. The district's approach reflects the three pillars of effective AI integration.

Leadership Condition-Setting: Superintendent Hill established strategic direction by convening an AI Steering Committee and launching the initiative through the district's annual Data Privacy Summit, grounding the work in data privacy and cybersecurity principles while clearly signaling these priorities to the community. Extensive community engagement shaped the district's vision, guiding principles, and strategic direction through stakeholder focus groups including students, board members, community members, caregivers, educators, principals, and central office teams.

Governance Infrastructure: Before any AI tools could be activated on the network, the district built the structural safeguards necessary for responsible adoption. IT approval became a mandatory gateway: no tool goes live without contract vetting for privacy requirements, data handling protocols, and cybersecurity standards. This legal and technical review process, coordinated between IT and Legal, ensures that every vendor agreement meets the district's data sovereignty requirements and reduces cyber risk exposure. The district established ethical principles and guardrails upfront, identified specific problems worth solving rather than adopting technology for its own sake, and trained central office staff on these frameworks before any classroom implementation began.

Staff AI Empowerment: With governance structures in place, the Executive Director of Educational Technology, reporting to the Chief Technology Officer, translated the superintendent's vision into operational reality. The district released guidance for ethical AI use and required all employees to complete data privacy training before accessing vetted tools. Rather than a district-wide rollout, Charlotte-Mecklenburg created a rigorous application process for schools interested in serving as early adopters. Central office teams reviewed applications which were brought to the AI Steering Committee for approval. The selected "AI Champion Schools" were provided intensive training for this first cohort, preparing over 200 educators as AI professional development facilitators who could support their peers.

The Result: AI is becoming the invisible thread supporting all departments and functions, not a siloed initiative. Charlotte-Mecklenburg successfully navigated their first phase of AI implementation because leadership built the governance infrastructure first, then systematically expanded competency from central office to schools to classrooms.

Making Governance Adaptive

Start with problems, not tools. Don't buy "AI"; solve chronic absenteeism or teacher burnout using AI. The discipline of starting with problems is the difference between strategic adoption and expensive distraction. There should be no more than three system-wide AI goals at a time, with explicit priority laid out if there are conflicts in which order the goals should be focused on. There should be one accountable owner per goal and these goals should be explained very simply without jargon. Leaders should prepare team members that tradeoffs are going to be difficult, but this will help ensure that goal-setting becomes a learning process for how to govern.

Design pilots to decide, not delay. Every pilot needs either a kill switch or a scale plan, determined by metrics established upfront. Consider 12-week sprint cycles aligned with natural planning periods, whether quarters, semesters, or testing windows. The principle matters more than the precise timeline. Create regular cycles for learning, adjusting, and scaling what works.

Operationalize the cycle. Every pilot should have (1) a named owner, (2) success metrics set upfront, (3) a defined decision date, and (4) a required recommendation: scale, revise, or stop. At the end of each cycle, governance should produce a short public-facing summary of what is being tested and what safeguards are in place to sustain trust.

Establish a human-in-the-loop mandate. No consequential AI output, grades, disciplinary recommendations, or communications to families, should be final without human review.

Practice the "Safe Yes." Proactive transparency about what tools are used and how data are protected builds the trust necessary to experiment. Organizations that adopt quietly are one news story away from losing their license to innovate.

Revisit guidance, use cases and needs frequently. AI especially requires this constant evaluation and evolution because the technology and human use of it is changing so fast. Leaders should have monthly internal updates (what is approved, what is being piloted, what is being discontinued, and why) and consider developing public-facing dashboards with AI use and safeguards that are made transparent.

Leaders should avoid promises they cannot control, such as permanent tool lists, fixed policies that will never change, or guarantees that every role will stay the same. Instead, communicate what will be stable (decision rights, risk tiers, human review, transparency) and what will evolve (tools, training, and safeguards) as the state or district learns.

Conclusion

The question for K-12 leaders is not whether to adopt AI, but how to govern its inevitable presence. Those who fail to implement flexible governance face wasted resources, data vulnerabilities, and widening gaps in outcomes that fall hardest on the students who most need systems that work. Those who assess their context, clarify decision rights, and structure teams appropriately will find that AI strengthens their system rather than fragments it.

By treating AI as a competency rather than a tool, districts and states move from reactive consumers to proactive architects. Adaptive Governance ensures that when the technology changes next month, the organization has the judgment, not just the policy, to respond.

How ILO Can Support Your Journey

ILO Group's AI division, AiLO, works alongside states and districts to build governance capacity:

- Landscape analyses and stakeholder engagement to identify opportunities and gaps
- AI strategy, governance frameworks, and ethical guidelines tailored to local context
- Workforce upskilling programs for leaders and educators
- Strategic implementation partnership with hands-on support
- AI Strategy & Leadership Cohort for District and State leadership teams

AI will define the next decade of education. Now is the moment to ensure its use reflects your community's values, and transforms systems rather than adding complexity.

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