New Policy/Procedure Memo

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Policy: Grow NJ Kids Rating Artificial Intelligence Policy
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Rationale: The inclusion of guidance regarding the use of artificial intelligence (AI) in GNJK rating evidence submission is intended to preserve the integrity and validity of the rating process. ***GNJK ratings are based on documentation that is expected to reflect authentic program practices, interactions, and environments.*** As AI tools become more accessible, there is an increasing need to articulate the expectations and appropriate boundaries for how tools may be used to support the preparation of rating evidence. Establishing a clear rationale and response protocol helps ensure that all programs are held to consistent expectations, that evidence remains verifiable and grounded in observed practice, and that GNJK ratings continue to accurately reflect program quality. This approach also supports fairness across programs while allowing flexibility for the appropriate use of technology in preparation and documentation.

Description of policy/procedure:

Programs may use AI tools to assist with drafting, organizing, translating, summarizing, or formatting documentation. ***However, AI tools may not be used to fabricate, simulate, materially alter, or misrepresent program practices, interactions, environments, records, photographs, videos or other evidence submitted for rating. All submitted evidence must be accurate, verifiable, and grounded in authentic program practice***.

Programs remain responsible for ensuring the accuracy and authenticity of all submitted evidence. Programs also must be able to verify the source of any materials submitted, including those prepared with AI assistance. AI-assisted narratives or documents may be submitted when they accurately reflect real program practices and can be supported by authentic underlying documentation. AI generated content, including documentation that is fabricated, synthetic, materially altered, or otherwise does not accurately reflect authentic program practice must NOT be submitted.

A Portfolio Review Assistant (PRA) may request clarification or additional documentation if there is uncertainty regarding the origin or authenticity of submitted evidence. If there is a concern that submitted evidence may not be authentic, verifiable, or accurately reflective of actual program practice, the following process will be implemented.

<u>Rating Review and Response Procedure</u>
If a PRA has a concern that submitted evidence may not be authentic, verifiable, or accurately reflective of actual program practice, the PRA may request clarification or additional documentation. Programs will have an opportunity to explain the evidence and provide supporting or alternate authentic documentation before a final determination is made. Programs are expected to cooperate with reasonable requests for clarification and supporting documentation related to evidence submitted for rating.

1. **Initial Review and Documentation**
    - The PRA will document the specific piece(s) of evidence in question and the reason for concern (e.g., language inconsistencies, lack of alignment with observed practice, or indications of synthetic content)
    - The PRA will also identify which GNJK standard(s) the evidence was intended to support
2. **Request Clarification from the Program**
    - The PRA will contact the program director or provider to request clarification on the origin of the submitted evidence
    - The PRA will ask whether AI tools were used in the creation or modification of the materials
    - The PRA will provide a clear explanation that the concern relates to evidence authenticity, not the use of supportive tools in general

3. **Verification of Authentic Evidence**
    - The PRA will request supporting documentation that demonstrates that the evidence reflects actual program practice (e.g., raw documentation, photos, videos, lesson plans, observation records, or timestamps where applicable)
    - Submitted evidence will be compared with other sources collected during the rating process

4. **Determine Evidence Acceptability**
    - Based on the review, the PRA will determine one of the following:
        - **Accepted:** Evidence is verified as authentic and accurately reflects program practice
        - **Partially accepted:** Some components are valid, but portions are not verifiable or were AI-generated without clear grounding in practice
        - **Not accepted:** Evidence cannot be verified as reflecting actual program practice

    *When evidence is **partially accepted**, the PRA will identify the portion that may be considered and the portion that cannot be relied upon. The PRA will document any additional evidence needed for the program to demonstrate the applicable standard.*

5. **Communicate Outcome to Program**
    The Rating Summary Report will identify any evidence that could not be accepted or verified, the affected standard(s), and any resulting impact on the rating determination.

6. **Escalation (if needed)**
    Escalation to GNJK Rating Leadership and, when appropriate, DFD may occur when there is credible evidence of:
    - Intentional misrepresentation;
    - Repeated submission of non-authentic evidence;
    - Potential impact on rating validity; and/or
    - It is necessary to document the issue for potential policy refinement or training follow-up

7. **Continuous Improvement and Policy Updates**
    De-identified findings and trends may be reviewed separately to inform future guidance, training, or policy refinement.