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Board memo: 90 days to AI governance that can stop a system

To: _____ **From:** _____ **Date:** _____

Decision asked: Name, by _____ (date), one person for each of our three highest-risk AI systems who can pause it.

WHY NOW

- In a Gartner survey of 302 cybersecurity leaders (March to May 2025), 69% of organisations suspect or have evidence that employees use prohibited public GenAI.
- In *Moffatt v. Air Canada* (14 February 2024), British Columbia's Civil Resolution Tribunal held the airline liable for what its chatbot told a customer. The tribunal wrote that Air Canada in effect suggested the chatbot was "a separate legal entity that is responsible for its own actions," "a remarkable submission."
- NIST's AI Risk Management Framework has 19 categories and 72 subcategories. This plan answers 12 first.

THE 90 DAYS

Phase, weeks	Documents	NIST AI RMF
GOVERN, 1 to 2	1 AI system inventory; 2 Risk register; 3 Accountability matrix; 4 Governance charter	GOVERN 1.4, 1.6, 2.1; MAP 5.1; MANAGE 1.2
MAP, 3 to 6	5 Context and impact record	MAP 1.1
MEASURE, 7 to 10	6 Baselines and thresholds; 7 Production monitoring	MEASURE 1.1, 2.4
MANAGE, 11 to 13	8 Escalation and incident procedure; 9 Deployment gate; 10 Authority to pause	MANAGE 1.1, 2.4, 4.1, 4.3

Each system gets the Family Test on entering the inventory and again at the gate: "Would I be comfortable if this AI system made this decision about my family?" If no, the system waits until someone can explain why it should go ahead.

WHAT IT COSTS

The time of three people for 90 days (the governance owner, one business stakeholder, one technical lead) and no new tool. This is the method's design, and we have measured no result.

WHAT IT DOES NOT DO

It does not make us compliant with the EU AI Act or ready for ISO/IEC 42001. Outside feedback and a diverse team wait for the Align stage (months 3 to 6); third-party AI risk (GOVERN 6, MANAGE 3) is added when you buy AI. High-stakes systems need more design work before launch.

WHAT THE BOARD SEES ON DAY 90

Systems inventoried, a named person who can pause each, the first system through the deployment gate, and review dates set by tier (monthly high, quarterly medium, yearly low).

THE QUESTION FOR OUR NEXT MEETING

> For our three highest-risk AI systems, who, by name, can pause them today?

SOURCES

- Worksheet: askajay.ai/frameworks/mvg-governance-worksheet.html
- Gartner press release, 19 November 2025; Moffatt v. Air Canada, 2024 BCCRT 149; NIST AI 100-1
- Others use "minimum viable governance" too, MIT CISR among them (briefing).

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