# AI Governance, Risk and Compliance (GRC) Assessment

#### **Complete Question Matrix**

#### **Domain 1: AI Governance and Risk Management**

| No. | Question   | <b>Control Reference</b>                                    | Remediation  |
|-----|--|---|--|
| 1.1 | Does the organization have a documented AI governance policy that aligns with ISO 42001?         | ISO 42001 Section<br>5.2 (Al Policy)                        | Develop and implement an AI<br>governance policy that<br>establishes principles, roles, and<br>responsibilities for AI systems<br>management, aligned with ISO<br>42001 requirements |
| 1.2 | Has the organization established a formal AI risk assessment methodology?                        | NIST AI RMF (MAP<br>function), ISO 42001<br>Section 6.1     | Implement a structured AI risk<br>assessment methodology based<br>on NIST AI RMF MAP function,<br>including context analysis, risk<br>identification, and impact<br>assessment       |
| 1.3 | Are AI governance roles and responsibilities clearly defined, including CAISO and AIGC roles?    | ISO 42001 Section<br>5.3, NIST CSF 2.0<br>(GOVERN function) | Define and document AI<br>governance roles and<br>responsibilities, establish CAISO<br>and AIGC positions with<br>appropriate authority and<br>resources                             |
| 1.4 | Does the organization maintain an inventory of all<br>Al systems and their risk classifications? | CIS Control 1, NIST AI<br>RMF (MAP function)                | Create and maintain a<br>comprehensive inventory of all Al<br>systems with appropriate risk<br>classifications based on potential<br>impact  |
| 1.5 | Is there a process for regular review and approval<br>of AI systems before deployment?           | ISO 42001 Section<br>8.1, NIST AI RMF<br>(MEASURE function) | Establish a formal AI system<br>review and approval process that<br>includes security, ethics, and<br>compliance assessments before<br>deployment                                    |
| 1.6 | Does the organization have metrics to measure<br>the effectiveness of AI governance controls?    | ISO 42001 Section<br>9.1, NIST CSF 2.0<br>(GOVERN function) | Develop and implement metrics<br>to measure Al governance<br>effectiveness, with regular<br>reporting to leadership  |

# **Domain 2: AI Data Governance and Privacy**

| No. | Question  | <b>Control Reference</b>                                       | Remediation  |
|-----|---|--|--|
| 2.1 | Does the organization have a documented data<br>governance framework specific to AI training and<br>operational data? | ISO 42001 Section<br>7.5, NIST AI RMF<br>(MAP function)        | Develop and implement an Al-<br>specific data governance<br>framework that addresses data<br>quality, privacy, and security<br>throughout the Al lifecycle     |
| 2.2 | Are there processes to assess and mitigate bias in<br>AI training data?   | NIST AI RMF<br>(MEASURE function),<br>ISO 42001 Section<br>8.2 | Implement formal processes for<br>bias assessment in training data,<br>including diverse data sampling,<br>statistical analysis, and regular<br>bias audits    |
| 2.3 | Does the organization maintain data lineage and provenance tracking for AI systems?                                   | CIS Control 3, NIST AI<br>RMF (MAP function)                   | Establish data lineage and<br>provenance tracking systems<br>that document the origin,<br>transformations, and usage of all<br>Al-related data                 |
| 2.4 | Are there data protection controls specific to AI training datasets and model outputs?                                | CIS Control 3, ISO<br>42001 Section 8.3                        | Implement enhanced data<br>protection controls for AI<br>datasets, including encryption,<br>access controls, and data<br>minimization techniques               |
| 2.5 | Does the organization have a data retention and disposal policy for AI training data?                                 | CIS Control 3, NIST<br>CSF 2.0 (PROTECT<br>function)           | Develop and implement a data<br>retention and disposal policy<br>specific to AI training data that<br>complies with relevant<br>regulations and minimizes risk |
| 2.6 | Is there a process for regular data quality assessment for AI systems?  | ISO 42001 Section<br>9.1, NIST AI RMF<br>(MEASURE function)    | Establish formal data quality<br>assessment processes for Al<br>systems, including<br>completeness, accuracy, and<br>relevance checks                          |

## **Domain 3: AI Model Development and Security**

| No. | Question   | <b>Control Reference</b>                                   | Remediation  |
|-----|--|--|--|
| 3.1 | Does the organization follow a secure AI model development lifecycle?                | ISO 42001 Section<br>8.1, NIST AI RMF<br>(MANAGE function) | Implement a secure AI model<br>development lifecycle that<br>includes security requirements,<br>threat modeling, and security<br>testing at each phase           |
| 3.2 | Is there comprehensive documentation for all Al models, including version control?   | ISO 42001 Section<br>7.5, CIS Control 2                    | Establish standardized<br>documentation practices for AI<br>models, including architecture,<br>parameters, training methods,<br>and version control              |
| 3.3 | Are Al models tested for security vulnerabilities before deployment?                 | CIS Control 16, NIST<br>CSF 2.0 (PROTECT<br>function)      | Implement comprehensive<br>security testing for AI models,<br>including adversarial testing,<br>input validation, and output<br>filtering                        |
| 3.4 | Does the organization assess and manage supply chain risks for AI components?        | CIS Control 15, NIST<br>CSF 2.0 (IDENTIFY<br>function)     | Develop and implement a supply<br>chain risk management program<br>for Al components, including<br>vendor assessment and<br>component verification               |
| 3.5 | Are there processes for secure model updates and versioning?                         | CIS Control 7, ISO<br>42001 Section 8.1                    | Establish formal processes for<br>secure model updates, including<br>testing, approval, and rollback<br>capabilities   |
| 3.6 | Does the organization perform regular security assessments of third-party AI models? | CIS Control 15, NIST<br>AI RMF (MEASURE<br>function)       | Implement a program for regular<br>security assessments of third-<br>party AI models, including<br>documentation review, testing,<br>and compliance verification |

## **Domain 4: AI Operations and Deployment**

| No. | Question   | <b>Control Reference</b>                                    | Remediation   |
|-----|--|---|---|
| 4.1 | Does the organization implement secure<br>deployment practices for AI systems?           | CIS Control 4, NIST<br>CSF 2.0 (PROTECT<br>function)        | Develop and implement secure<br>deployment procedures for AI<br>systems, including configuration<br>management, environment<br>separation, and deployment<br>verification |
| 4.2 | Is there continuous monitoring of AI systems in production for security anomalies?       | CIS Control 13, NIST<br>AI RMF (MEASURE<br>function)        | Implement continuous<br>monitoring solutions for AI<br>systems that detect security<br>anomalies, unexpected<br>behaviors, and performance<br>issues                      |
| 4.3 | Are there robust access controls and authentication mechanisms for AI systems?           | CIS Control 6, ISO<br>42001 Section 8.3                     | Establish strong access controls<br>for AI systems, including multi-<br>factor authentication, role-based<br>access, and privilege<br>management                          |
| 4.4 | Does the organization maintain comprehensive<br>logs of AI system operations and access? | CIS Control 8, NIST<br>CSF 2.0 (DETECT<br>function)         | Implement comprehensive<br>logging for AI systems, including<br>system operations, access<br>attempts, and administrative<br>actions                                      |
| 4.5 | Are there processes to detect and address model drift or performance degradation?        | ISO 42001 Section<br>9.1, NIST AI RMF<br>(MEASURE function) | Establish processes to detect and<br>address model drift, including<br>performance monitoring,<br>statistical analysis, and<br>remediation procedures                     |
| 4.6 | Does the organization have secure configuration standards for AI infrastructure?         | CIS Control 4, NIST<br>CSF 2.0 (PROTECT<br>function)        | Develop and implement secure<br>configuration standards for Al<br>infrastructure, including servers,<br>networks, and cloud<br>environments                               |

## **Domain 5: AI Incident Response and Recovery**

| No. | Question  | <b>Control Reference</b>  | Remediation   |
|-----|---|---|---|
| 5.1 | Does the organization have AI-specific incident response procedures?                      | CIS Control 17, NIST<br>CSF 2.0 (RESPOND<br>function)           | Develop and implement Al-<br>specific incident response<br>procedures that address unique<br>Al failure modes, security<br>incidents, and ethical breaches              |
| 5.2 | Are there capabilities to roll back Al systems to previous versions in case of incidents? | CIS Control 11, NIST<br>CSF 2.0 (RECOVER<br>function)           | Implement and test AI system<br>rollback capabilities, including<br>version control, configuration<br>backups, and deployment<br>automation                             |
| 5.3 | Does the organization maintain backups of Al models, training data, and configurations?   | CIS Control 11, ISO<br>42001 Section 7.5                        | Establish comprehensive backup<br>procedures for AI assets,<br>including models, training data,<br>and configurations, with regular<br>testing of restoration processes |
| 5.4 | Is there a business continuity plan that addresses<br>Al system failures?                 | NIST CSF 2.0<br>(RECOVER function),<br>ISO 42001 Section<br>6.1 | Develop and test a business<br>continuity plan that addresses Al<br>system failures, including<br>alternative processes and<br>recovery time objectives                 |
| 5.5 | Does the organization conduct post-incident<br>analysis for AI-related incidents?         | CIS Control 17, NIST<br>AI RMF (MANAGE<br>function)             | Implement post-incident analysis<br>processes for AI-related<br>incidents, including root cause<br>analysis, impact assessment,<br>and improvement<br>recommendations   |
| 5.6 | Are Al incident response team members trained on<br>Al-specific incident scenarios?       | CIS Control 17, NIST<br>CSF 2.0 (RESPOND<br>function)           | Provide specialized training for<br>incident response team<br>members on AI-specific incident<br>scenarios, including technical,<br>ethical, and reputational aspects   |

## **Domain 6: AI Transparency and Explainability**

| No. | Question  | <b>Control Reference</b>                                       | Remediation  |
|-----|---|--|--|
| 6.1 | Does the organization implement explainable Al methodologies for high-risk Al applications? | NIST AI RMF (MAP<br>function), ISO 42001<br>Section 8.4        | Implement appropriate<br>explainable AI methodologies<br>based on use case requirements,<br>including local and global<br>explanation techniques                               |
| 6.2 | Is there documentation of AI decision processes for critical systems?                       | ISO 42001 Section<br>7.5, NIST AI RMF<br>(MEASURE function)    | Develop and maintain detailed<br>documentation of AI decision<br>processes, including model logic,<br>key features, and decision<br>boundaries                                 |
| 6.3 | Are there mechanisms to ensure transparency in AI-human interactions?                       | NIST AI RMF<br>(MANAGE function),<br>ISO 42001 Section<br>8.4  | Implement transparency<br>mechanisms for AI-human<br>interactions, including disclosure<br>of AI use, confidence levels, and<br>limitations                                    |
| 6.4 | Does the organization have methods to interpret<br>and validate model outputs?              | NIST AI RMF<br>(MEASURE function),<br>ISO 42001 Section<br>9.1 | Establish methods for<br>interpreting and validating model<br>outputs, including statistical<br>analysis, human review, and<br>comparison with expected<br>outcomes            |
| 6.5 | Is there clear communication to stakeholders about AI system limitations?                   | ISO 42001 Section<br>7.4, NIST AI RMF<br>(GOVERN function)     | Develop clear communication<br>materials about AI system<br>limitations, including accuracy<br>boundaries, known biases, and<br>appropriate use cases                          |
| 6.6 | Are there processes to address algorithmic<br>transparency requirements from regulations?   | ISO 42001 Section<br>6.1, NIST CSF 2.0<br>(GOVERN function)    | Establish processes to identify<br>and address algorithmic<br>transparency requirements from<br>applicable regulations, including<br>documentation and reporting<br>mechanisms |

# Domain 7: AI Literacy and Training

| No. | Question   | <b>Control Reference</b>                                    | Remediation  |
|-----|--|---|--|
| 7.1 | Does the organization have an AI awareness program for all employees?                                    | CIS Control 14, NIST<br>CSF 2.0 (GOVERN<br>function)        | Develop and implement an AI<br>awareness program for all<br>employees, covering AI<br>capabilities, limitations, and<br>responsible use  |
| 7.2 | Is there specialized technical AI security training for relevant personnel?                              | CIS Control 14, ISO<br>42001 Section 7.2                    | Establish specialized technical AI<br>security training for IT, security,<br>and development personnel,<br>including threat modeling,<br>secure development, and<br>vulnerability management |
| 7.3 | Does the organization provide AI ethics training for<br>staff involved in AI development and deployment? | ISO 42001 Section<br>7.3, NIST AI RMF<br>(GOVERN function)  | Implement AI ethics training that<br>covers fairness, accountability,<br>transparency, and privacy<br>considerations in AI systems   |
| 7.4 | Is there training on AI risk management for<br>leadership and risk management personnel?                 | ISO 42001 Section<br>7.2, NIST AI RMF<br>(MAP function)     | Develop and deliver AI risk<br>management training for<br>leadership and risk personnel,<br>covering AI-specific risks,<br>assessment methodologies, and<br>mitigation strategies            |
| 7.5 | Does the organization have a continuous learning program for AI security and governance?                 | CIS Control 14, ISO<br>42001 Section 7.2                    | Establish a continuous learning<br>program for AI security and<br>governance, including regular<br>updates on emerging threats,<br>regulatory changes, and best<br>practices                 |
| 7.6 | Are there mechanisms to assess AI literacy and competency across the organization?                       | ISO 42001 Section<br>7.2, NIST CSF 2.0<br>(GOVERN function) | Implement mechanisms to<br>assess AI literacy and<br>competency, including<br>knowledge assessments, skills<br>evaluations, and certification<br>programs                                    |

Al Governance, Risk and Compliance (GRC) Assessment

Based on ISO 42001, CIS Controls, and NIST CSF frameworks