

AI Meeting Feature — VITA Intake

Assemble the facts before the review. This form does not make the determination.

Vicom

AV · UC · Network
vicom-corp.com

Feature: Owner:
Platform / room(s):

Registration is required if ANY ONE of the six triggers applies. The non-registration exemption requires ALL THREE of its conditions at once. Conditions quoted from VITA's published AI FAQs.

SIX TRIGGERS — ANY ONE

- ☐ "Externally facing"
- ☐ "Uses people data"
- ☐ "Utilized in a production system"
- ☐ "Supports agency mission essential or business critical processes"
- ☐ "Includes sensitive data as defined in SEC530 Information Security Standard"
- ☐ "Requires review for the evaluation of cloud services"

EXEMPTION — ALL THREE, TOGETHER

- ☐ "Internally facing"
- ☐ "Does not use people data"
- ☐ "Not incorporated in a production system (examples of non-production systems are sandbox, development and test systems only using synthetic or publicly available data)"

A sandbox using real staff recordings would not appear to satisfy #2; a pilot in the live tenant would not appear to satisfy #3. The reviewers confirm.

READ THIS CLAUSE SLOWLY

The embedded-product exemption applies "where the Commonwealth does not control the software or the data it uses." An agency running its own tenant, holding its own recordings and setting its own retention should test that against its reviewers.

THE TEN QUESTIONS

1. What is the feature, and what business outcome does enabling it serve?
2. Who owns the feature, and who is accountable for switching it on?
3. Who are the users, and can members of the public be present?
4. What exactly is captured: audio, video, transcript, derived summary, speaker labels?
5. How is the captured content classified, including against SEC530?
6. Where does processing occur, and does anything leave the Commonwealth's control?
7. Where do transcripts and derived records live, for how long, and who can reach them?
8. Can the feature take an action, or does it only produce text?
9. Who reviews the output before it is relied on, how is an error corrected, and how is the feature monitored once enabled?
10. What happens on exit: how is the feature disabled and the content handled?

Also: what changes if the vendor swaps a subprocessor, and what would have to be produced if someone asked for the record in six months.

QUESTIONS ONLY THE ROOM ANSWERS

- ☐ Always listening, or capture on a deliberate action?
- ☐ How is active capture signaled, including to someone arriving late?
- ☐ Who may start it? Can any participant stop it immediately?
- ☐ How are speakers attributed on a shared microphone?
- ☐ What happens in an impromptu, unscheduled gathering?
- ☐ Does the signal path change with a remote participant?
- ☐ Same behavior after a reboot or firmware update?

THREE DECISIONS, NOT ONE

- ☐ **Transcription** — record of what was said
- ☐ **Summarization** — a document nobody wrote
- ☐ **Agentic action** — a change in another system

ROUTE TO

- ☐ Assigned enterprise architect
- ☐ AITR · ISO · agency head process
- ☐ Archer + Commonwealth Technology Portfolio

Decision: Signed: Date: