

TEXAS K-12 AI COMPLIANCE GUIDE

AI Executive Change Reference: related to recent 2026 updates to Texas Codes

Summary of AI related requirements for Texas Public Schools based on TEC, TAC, TGC, and BCC as of July 2026.

For comprehensive detail, see the Region 16, K-12 AI Guidance and Guardrails workbook and AI Risk Officer's Step-by-Step Guide. For in-person support, contact your Education Service Center.

1. GOVERNANCE & BOARD MANDATES

AI Risk Officer: Appoint a leader to oversee ethical procurement and certify all risk assessments. (1 TAC §219.21)

AI Code of Ethics: Formally adopt the DIR Code of Ethics (1 TAC §219.11(a)) for all district AI decisions.

Vetting Protocol: Establish a board-approved protocol to vet AI systems prior to acquisition.

Approval Workflows: Define protocols for obtaining approval on AI system deployments.

2. OPERATIONAL & TECHNICAL CONTROLS

Kill-Switch Mandate: Implement protocols to immediately disable any AI. (1 TAC §219.11(c)(2)(C))

Data Minimization: Collect and retain only the minimum PII necessary, deleting consistent with schedules.

System Logs: Maintain detailed records of AI data sources and system modifications throughout its lifecycle.

Vendor Disclosure: Require AI providers to timely disclose known vulnerabilities and resolutions.

3. STAFF TRAINING & ACCOUNTABILITY

Accuracy Verification: Train staff to verify all AI outcomes for accuracy before acting on them.

Acceptable Use: Define and train employees on acceptable use cases and limitations for each tool.

PII Restrictions: Prohibit staff from inputting student PII into unauthorized public AI systems.

Annual Coordinator Training: Cybersecurity coordinators & board members must complete annual DIR AI Awareness training.

4. STUDENT DATA PRIVACY & SAFETY

Biometric Consent: Obtain prior written parental consent to collect student faceprints/voiceprints. (TEC §26.009)

Wellness Bots: Parental consent is mandatory for wellness bots designed to impact student behavior.

Biometric Limits: Prohibit AI systems that uniquely identify individuals without consent or infringe rights.

Purpose Limitation: Abide by the original purpose limits for which student PII was collected.

5. PUBLIC TRANSPARENCY

Interaction Disclosure: Disclose to the public when they interact with a public-facing AI system. (1 TAC §219.11(g)(2)(C))

Consequential Decisions: Disclose when AI is used to make consequential decisions (See HSAI below)

Human Representation: Never represent an AI system as a human when interacting with the public.

6. HEIGHTENED SCRUTINY AI (HSAI) RULES

Definition: AI making or influencing *consequential decisions* affecting student/staff rights, access to services, or opportunities.

Risk Assessments: Complete written assessments documenting security, performance, and transparency. (1 TAC §219.22(a))

Deployment Approval: AI Risk Officer must approve deployment, and the Superintendent must be notified. TAC §219.22(c)(1)– (2)

NIST Alignment: Contractually require HSAI vendors to implement standard risk management frameworks like NIST AI RMF. TAC §219.24(d)

DECISION MATRIX: IS IT HEIGHTENED SCRUTINY AI (HSAI)?

NOT HSAI (Preparatory Tasks)

AI that simply helps a human work faster but does not make the final decision.

Examples: Summarizing resumes into a table, drafting letters, translating materials, or brainstorming lesson plans.

HSAI (Consequential Decisions)

AI that acts as the controlling factor or automates a consequential outcome without meaningful human review.

Examples: Automated screening deleting resumes, automated student grading, or enrollment placements

AI Adoption Guiding Question: "Will this create more opportunities for the enrichment of human-to-human interactions?"