

FIELD GUIDE + WORKING SHEETS

AI Accountability Map

Trace a consequential AI-influenced decision from the people it affects to the evidence behind it and a path to recourse.

How to use it Choose one decision. Work through all seven questions, noting where evidence is missing or an answer is disputed. End with an action: a record to request, a person to ask, or a remedy to pursue.

THE SEVEN QUESTIONS

1	The Decision	What decision did the AI system influence?
2	The Impact	Who was affected, and what harm occurred?
3	The Actors	Who designed, purchased, configured, deployed, monitored, and relied on the system?
4	The Evidence	What records demonstrate how the decision was made?
5	Human Oversight	Where did a human enter the process, and did that person have meaningful authority?
6	The Accountability Gap	Where can responsibility be denied, transferred, or obscured?
7	Recourse	How can the affected person challenge the decision, get an explanation, and obtain a remedy?

Start with the actual decision, not the technology alone. The map works for healthcare, hiring, education, public services, and organizational workflows.

WORKED EXAMPLE

Post-acute care decisions

nH Predict illustrates how to ask accountability questions when a prediction may influence coverage and care.

About the record. Patients allege nH Predict was used in coverage decisions. UnitedHealthcare disputes that characterization. The court allowed contract claims to proceed and ordered discovery about the tool's design, use, and oversight. This exercise identifies questions to investigate; it does not decide the disputed facts.

APPLY EACH QUESTION

- 1

The Decision

Identify the coverage or length-of-stay decision for post-acute care.
- 2

The Impact

Ask what happened to the patient when care was limited, denied, or appealed.
- 3

The Actors

Trace naviHealth, the payer, reviewers, treating clinicians, and the patient.
- 4

The Evidence

Request clinical records, tool documentation, decision notes, notices, and appeal records.
- 5

Human Oversight

Ask whether a reviewer could meaningfully depart from a predicted stay.
- 6

The Accountability Gap

Locate gaps where vendor, payer, reviewer, policy, or model can each deflect responsibility.
- 7

Recourse

Map the path to an explanation, appeal, correction, or other remedy.

Try it: Which missing record would most change your understanding? Who can provide it? What would meaningful review or recourse look like for the affected person?

Sources: 2025 court order; 2026 discovery order; Senate Permanent Subcommittee on Investigations, 2024. Direct links are on page 5.

WORKING SHEET / 1 OF 2

Define the decision

Choose one situation. Write what is known, what is alleged, and what still needs verification.

1

The Decision

What decision did the AI system influence?

2

The Impact

Who was affected, and what harm occurred?

3

The Actors

Who designed, purchased, configured, deployed, monitored, and relied on the system?

4

The Evidence

What records demonstrate how the decision was made?

WORKING SHEET / 2 OF 2

Find the accountability gap

Follow the decision to human oversight and a remedy the affected person can actually use.

5

Human Oversight

Where did a human enter the process, and did that person have meaningful authority?

6

The Accountability Gap

Where can responsibility be denied, transferred, or obscured?

7

Recourse

How can the affected person challenge the decision, get an explanation, and obtain a remedy?

WORKING CONCLUSION

The most important unanswered question is: _____

ACTION SHEET

Turn gaps into next steps

Assign a record, an owner, and a next action to each unresolved question. This is where the map becomes useful to a team.

Unanswered question / gap	Evidence or record to obtain	Who can provide it	Next action + date

CLOSE THE LOOP

Who will explain the decision to the affected person? How can they challenge it? What remedy is available if the decision was wrong?

SOURCES AND FURTHER READING

- 2025 court order in Estate of Lokken v. UnitedHealth Group
- 2026 discovery order in Estate of Lokken v. UnitedHealth Group
- Senate PSI investigation summary
- NIST AI RMF / IEEE 7000 / EU AI Act / FDA digital health guidance