ISLAND SECURITY POLICY INSTITUTE

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WHITE PAPER

AI Governance and Public Safety Technology Policy for Island and Small-State Communities

Accountability, Bias, and the Missing Framework for Small Jurisdiction AI Deployment

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EXECUTIVE SUMMARY

- **Public safety AI tools are being deployed in law enforcement, emergency management, and threat assessment at an accelerating pace. The policy and governance infrastructure for accountability, bias mitigation, and failure response has not kept pace with deployment.**
- **For island and small-state communities, the risks are compounded: public safety AI tools are trained predominantly on continental, primarily mainland urban and suburban environments. Native Hawaiian, Pacific Islander, Micronesian, and Polynesian populations are systematically underrepresented in training datasets.**
- **AI miscalibration harms in small island jurisdictions are both more likely to occur — because the training data gap is larger — and less likely to be detected — because the accountability infrastructure is thinner.**
- **ISPI's AI Governance Framework for Island and Small-State Jurisdictions addresses three specific gaps: pre-deployment demographic validation, third-party audit mandates, and small jurisdiction governance architecture appropriate for communities without large oversight infrastructure.**

Every public safety AI tool — whether a facial recognition system, a predictive policing platform, a behavioral threat scoring algorithm, or a border security screening tool — is a statistical model trained on historical data.[1] The quality of the model's pattern recognition in deployment is fundamentally limited by the quality and representativeness of its training data. In the United States, public safety AI training data is overwhelmingly derived from continental, predominantly mainland urban and suburban law enforcement and security environments.

> **A facial recognition system trained on continental demographic data may perform less accurately on Native Hawaiian and Pacific Islander faces — a documented pattern in facial recognition accuracy research that finds consistent accuracy differentials across demographic groups, with accuracy typically lowest for the demographic groups least represented in training data.**

I. The Training Data Problem

A behavioral threat scoring algorithm calibrated on continental organizational behavioral norms may flag culturally normal Pacific Island behavioral patterns as anomalous — producing false positive risk assessments that subject community members to inappropriate scrutiny. A predictive policing platform

calibrated on continental crime pattern data may generate predictions that reflect continental policing pattern biases rather than the actual crime patterns of Pacific Island community contexts.[2]

II. The Accountability Gap in Small Jurisdictions

When an AI tool deployed in a large continental jurisdiction produces a systematically biased output pattern, the accountability mechanisms available in large jurisdictions can detect, document, and address the problem.[3] Large case volumes produce statistically detectable patterns. Dedicated civil rights oversight bodies have the resources to investigate. Academic researchers have data access to study the problem. In a small Pacific Island territory or rural Hawaii jurisdiction, the same AI miscalibration affects a small number of specific individuals in a community where everyone knows everyone — without generating the case volumes that make systematic bias statistically detectable, and without the oversight infrastructure to investigate even if they did.

III. The ISPI AI Governance Framework

Component 1: Pre-Deployment Demographic Validation

Before deploying any AI public safety tool in Pacific Island or Hawaii community contexts, deploying agencies should require vendors to demonstrate validation specifically for the deployment community's demographic composition — not validation for generic "diverse" populations that may not include Pacific Islander and Native Hawaiian demographic representation. Validation should include specific accuracy and calibration testing on Pacific Islander and Native Hawaiian demographic populations, with results publicly disclosed for government deployments.

Component 2: Third-Party Audit Mandates

AI tools deployed by government agencies in Pacific Island and Hawaii communities should be subject to mandatory third-party auditing by independent organizations with technical AI assessment capacity and Pacific Island community knowledge — evaluating ongoing deployment accuracy, bias patterns, and calibration against the specific community context, with results publicly disclosed and specific remediation requirements when thresholds are exceeded.

Component 3: Small Jurisdiction Governance Architecture

AI governance frameworks for small Pacific Island and Hawaii jurisdictions should recognize accountability infrastructure limitations and establish alternative oversight mechanisms appropriate for small jurisdiction scale: inter-

agency AI oversight boards, territorial and state-level AI ombudsman functions, and mandatory incident reporting requirements that ensure AI-related harms are documented and addressed even when case volume is insufficient to trigger pattern detection through standard statistical analysis.

IV. Policy Recommendations

1. Require demographic validation documentation for AI public safety tools sold to Pacific Island territory and Hawaii government agencies — including training data demographic composition and validation testing results for Pacific Islander and Native Hawaiian demographic populations.
2. Establish mandatory third-party AI audit requirements for government AI deployment in Pacific Island territories, with public disclosure of audit findings.
3. Develop small jurisdiction AI governance frameworks through NIST and CISA recognizing that large-scale AI risk management frameworks assume accountability infrastructure that small island jurisdictions do not have.
4. Commission independent research on AI public safety tool performance in Pacific Island and Hawaii community contexts, with findings publicly available as a condition of any federal funding supporting the research.

V. Conclusion

AI public safety tools deployed without adequate governance in small island community contexts create risks that are both more likely to materialize and less likely to be detected and corrected than equivalent risks in large continental contexts. The policy response is not to prohibit AI deployment — the tools offer genuine operational benefits when appropriately governed — but to establish governance frameworks that ensure those benefits are achieved without systematic bias and accountability harms. ISPI accepts commissions for AI governance framework development, AI tool assessment for island community deployment contexts, and public safety technology policy research. Contact ISPIGlobal@proton.me or visit ispiglobal.com/commission.

NOTES AND REFERENCES

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The Island Security Policy Institute (ISPI) is a nonprofit, nonpartisan research organization based in Honolulu, Hawaii. ISPI produces practitioner-led research, policy analysis, training programs, and commissioned research on public safety, emergency preparedness, insider threat, and

security policy for island and coastal communities worldwide. ISPI is registered as a federal contractor on SAM.gov under NAICS 541720. Warren Pulley, Founder & Executive Director.

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