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BELMONT UNIVERSITY
Hope Summit Workshop Series

AI ACCOUNTABILITY GAP

WHITE PAPER PRODUCED BY BELMONT UNIVERSITY

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ACKNOWLEDGEMENTS

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CLOSING THE AI ACCOUNTABILITY GAP IN HIGHER EDUCATION AND INDUSTRY

Despite the rapid adoption of artificial intelligence (AI) across higher education, industry, and research domains, universities currently lack a coordinated, robust infrastructure to ensure accountability in AI development, deployment, and governance. While AI tools are increasingly embedded in university and industry operations, deliverables, and intellectual property, all institutions face significant gaps in expertise, oversight, policy, and transparency, a space that we call the 'accountability gap'.

There is an immediate and pressing need for industries, universities, and partners to move beyond reactive or siloed responses to AI risks and instead develop institution-wide strategies that promote accountable use, with clear understanding of the benefits and challenges of AI. Key challenges identified include unclear lines of responsibility for AI-related decisions, inadequate mechanisms for auditing and redressing harmful outcomes, and a lack of faculty and staff training in responsible AI practices.

To build lasting capacity in AI accountability, businesses and universities alike must establish cross-functional structures, partner with industries to shape the future workforce through innovative pedagogy and training pipelines, and cultivate a culture of critical engagement with AI technologies.

WHY DOES BELMONT UNIVERSITY CARE?

Belmont University cares deeply about the ethical and human implications of artificial intelligence. While AI may surpass human capabilities in many quantitative domains, it cannot replace the intrinsic value of humanity. As individuals created in the image of God, humans possess dignity, moral agency, and relational depth that no machine can replicate.

Belmont is called to lead not only in AI education but also in cultivating character and a Christ-centered mission. We are committed to nurturing both individual humanity and thriving communities, ensuring that technological advancement serves the greater good and reflects our foundational Christian values.

WHY SHOULD BUSINESSES CARE?

Concerns bring risk of regulation, reputation damage, and legal liability.

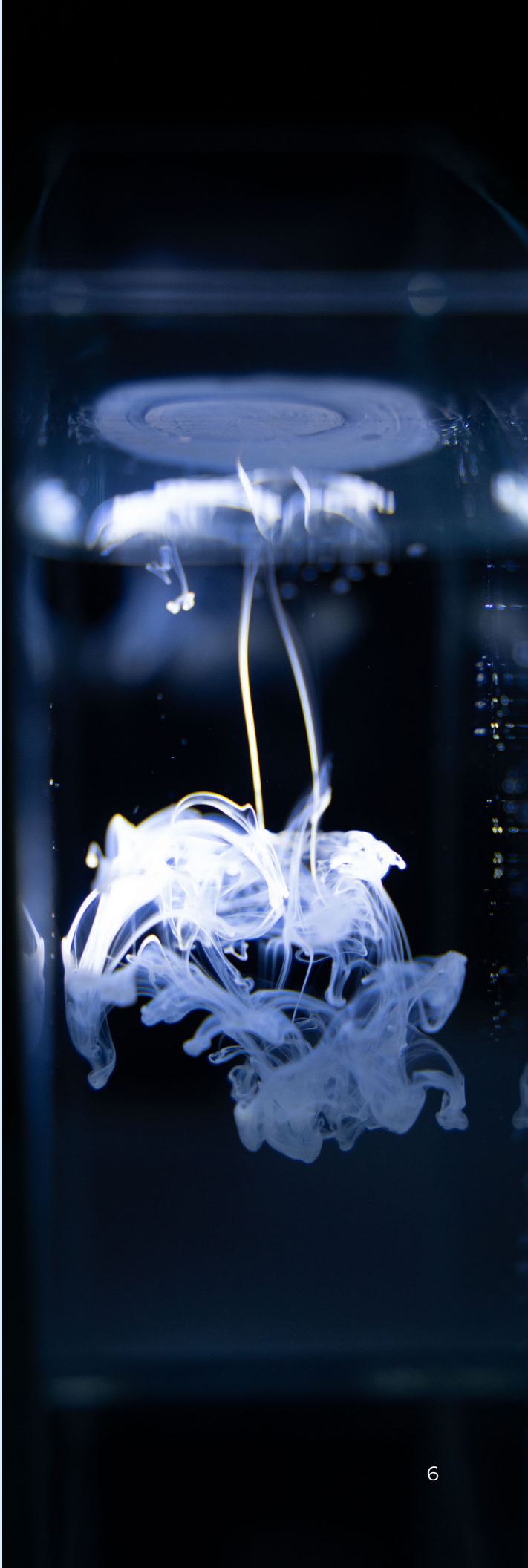
- One of the significant debates surrounding the passage of "H.R.1 - One Big Beautiful Bill Act" was AI Enforcement. While this was eventually removed from the bill, the fight shows that regulation (or not) is a top-level concern.
- Some companies require demonstrating that a new job request could not just be accomplished by automation.[1]
- Current and future workers are concerned.[2]
- These technologies are being adopted at the grassroots level, so leadership may not even be aware of how the company is utilizing AI, generating unrecognized or unseen corporate risks associated with security, mission alignment, or generative content that undermines the core products. Risks include repetitional damage and expensive litigation and regulations for unintended harm due to AI decisions.

As a result, C-suite leadership must address this issue.

WHAT IS AI ACCOUNTABILITY?

In the pages that follow AI accountability is described as a maturity model, where each level represents a progressively deeper and more proactive approach to ensuring responsible AI use. At the lowest level of accountability, for example, AI is merely an accounting of how AI is being used in an organization. Higher levels evolve toward a set of binding principles and their applications in AI.

Maturity models are employed in numerous disciplines to provide a framework for managing complex domains through incremental complexity. Governance, Risk, and Compliance (GRC) maturity models are used to describe how responsibility and oversight evolves into systematic processes within an organization, the World Bank uses a maturity models (the Public Financial Management, or Public Expenditure & Financial Accountability framework) to establish investment levels across public sectors, and Capability Maturity Model Integration (CMMI) has proven to be an effective means to map continuous improvement. Because maturity models represent small progressive actions, incremental costs in capital and time remain relatively low between steps. In addition, if adopted early, the costs of moving an organization through the entire model is much lower than the risks associated with negative outcomes.



AI ACCOUNTABILITY MODEL

Figure 1: AI Accountability is a maturity model that builds on itself from formal acknowledgement of AI use through an understanding of bias and risk analysis and ultimately culminating in an Ethical Framework-Driven Governance.

LEVELS OF ACCOUNTABILITY IN AI ADOPTION

LEVEL 0: NO FORMAL ACCOUNTABILITY

- AI is used ad hoc with no tracking, governance, or consideration of consequences.
- **EXAMPLE:** Deploying AI tools (e.g., chatbots, analytics) without documenting their use or impact.

LEVEL 1: BASIC ACCOUNTING

- The organization tracks where and how AI is used but does not assess its impact.
- **EXAMPLE**: An inventory of AI systems (e.g., "We use AI in HR recruiting and customer service").
- **GAP**: No analysis of biases, risk, or effectiveness.

LEVEL 2: EXPLAINABILITY (LOCAL TRANSPARENCY)

- Critical AI systems must provide explanations for decisions (e.g., "Why was this loan denied?").
- **EXAMPLE**: Implementing SHAP values or decision logs for high-stakes AI (e.g., hiring, lending).
- **GAP**: Explains decisions but doesn't address systemic biases or broader harms.

LEVEL 3: BIAS AUDITS

- Extends explainability with proactive bias testing (e.g., checking for demographic disparities).
- **EXAMPLE**: Running A/B tests on hiring algorithms to ensure no racial/gender bias.
- **GAP**: Focuses on technical flaws, not societal/ethical trade-offs (e.g., job displacement).

LEVEL 4: HARM-BENEFIT ANALYSIS & RISK MITIGATION

- Evaluates both positive and negative impacts (e.g., security risks, workforce effects, environmental costs).
- **EXAMPLE**: Assessing whether an AI-driven layoff system saves costs but damages morale/trust.
- **GAP**: Reactive—identifies problems but lacks structured stakeholder input.

LEVEL 5: STAKEHOLDER-INTEGRATED MITIGATION

- Engages employees, customers, and affected communities to co-design safeguards.
- **EXAMPLE**: A "red team" of ethicists, workers, and civil society groups stress-testing AI before deployment.
- **GAP**: Still a piecemeal approach; not yet a systemic driver of strategy.

LEVEL 6: ETHICAL FRAMEWORK-DRIVEN GOVERNANCE

- Accountability is fully embedded in decision-making, with AI ethics shaping business strategy.
- **EXAMPLE**:
  - AI principles (e.g., "human oversight first") dictate product development.
  - Ethics reviews are mandatory for all high-impact AI projects.
  - Compensation tied to responsible AI metrics (e.g., fairness scores).
- **OUTCOME**: Accountability becomes proactive, cultural, and a competitive advantage.

HAVEN'T ETHICISTS BEEN THINKING ABOUT THIS FOR A LONG TIME?

Yes. While we recognize that creating ethical frameworks is critically important, developing an ethical framework as a first step presents significant challenges (i.e., endless debates). As a result, AI Ethics/Responsible groups often work independently of actual company operations, resulting in limited adoption. Many of these groups merely represent "Ethics Signaling," where the primary purpose of the group is to signal thoughtfulness and concern without taking action. See "Ethics" article below for some possible sources on this (from AI).

KEY TAKEAWAYS FOR A CEO

DIRECTIONAL SHIFT: Advancing levels (e.g., Level 0 to 6) transforms accountability from a compliance task to a strategic driver.

TRADE-OFFS: Higher levels require more resources but reduce long-term risks (legal, reputational, operational).

ADOPTION CURVE: Most companies stall at Levels 1–3; leaders push to 5–6 for true trust and innovation.

MIND THE GAP

AI isn't just another technology; it's a foundational force being baked into critical systems right now. Without a framework for understanding and intentional direction setting, we are making a choice. We're permitting biases to be codified into hiring algorithms, privacy norms to be set by default settings, and security vulnerabilities to be integrated into infrastructure and compromise our ethical values. The longer we wait, the more expensive and disruptive it will be to fix these issues. The goal isn't to slow down AI, but to ensure its foundation is solid before we build our future on it. The cost of retrospective accounting is far greater than understanding the principles of accounting from the start.

Said another way, focusing on ethics, which may be considered the consequences of AI ecosystems is not an effective strategy. Key findings indicate that isolated AI ethics committees often lack operational integration, authority, and stakeholder diversity, leading to "ethics washing," scenarios where committees talk about ethics rather than fostering and equipping the organization for substantive change. In addition, the urgent and pressing need to recast AI Ethics as the end-product of an AI Accountability model is driven by relatively early stages of widespread AI adoption. A delay in understanding the implications of AI on industries or universities will be reflected in a lower adoption of AI accountability due to rapidly growing AI ecosystems and use cases, along with a much higher cost of implementing accountability measures.

Establishing an accountability framework, managed and supported by high character humans, will fill the gap between the rapid pace of AI evolution and the ethical implications resulting from these technologies. With a unique position to influence the AI workforce generation, Belmont's focus on deep character formation and the flourishing is precisely why our leadership is critical. We are uniquely positioned to develop students, faculty, staff, and partners who possess not only cross-disciplinary expertise and an interest in AI's new possibilities, but also a deep commitment to preserving human dignity. AI presents one of the most profound opportunities and challenges of our time, and we have the unique capacity to ensure its architects and stewards are guided by a moral compass, not just a technical one.

Let us act now to develop and deploy a concrete framework for AI Accountability, empowering thoughtful leaders across all disciplines to implement it. Let's not just adopt AI; let's shape it into a testament to our values.

REFERENCES

1. Annie Palmer (2025). Shopify CEO says staffers need to prove jobs can't be done by AI before asking for more headcount. https://www.cnbc.com/2025/04/07/shopify-ceo-prove-ai-cant-do-jobs-before-asking-for-more-headcount.html

2. Luona Lin & Kim Parker (2025). U.S. Workers Are More Worried Than Hopeful About Future AI Use in the Workplace. https://www.pewresearch.org/social-trends/2025/02/25/u-s-workers-are-more-worried-than-hopeful-about-future-ai-use-in-the-workplace/

APPENDIX

1. STRUCTURAL DISCONNECT BETWEEN ETHICS GROUPS AND OPERATIONS

- **Empirical Insight:** A study of 32 AI professionals revealed that ethics guidelines focus narrowly on developer-level actions (micro/meso levels), overlooking systemic issues like surveillance capitalism or labor displacement. These "structural challenges" stem from organizational incentives and market pressures beyond individual control.
- **Consequence:** Ethics groups become "preachers with no congregation" because they lack the authority to influence business decisions. For example, COMPAS recidivism algorithms perpetuated racial bias despite ethical frameworks, as operational teams prioritized efficiency over fairness.
- **Case Evidence:** Only 25% of generative AI outputs meet accuracy benchmarks (TruthfulQA), yet ethics committees rarely enforce corrective actions due to separation from product teams.

2. LACK OF STAKEHOLDER INCLUSION AND INTERDISCIPLINARY INPUT

- **Empirical Insight:** Multi-stakeholder workshops in the agri-food sector showed that excluding civil society, policymakers, and end-users (e.g., farmers) led to AI solutions that exacerbated inequalities. Ethics groups dominated by engineers missed socio-ethical risks like data colonialism.
- **Consequence:** Top-down guidelines (e.g., "fairness by design") fail in practice. For instance, medical AI systems faced low adoption by doctors due to unresolved biases in training data—a gap that persisted because clinicians were not included in ethics reviews.
- **Solution Highlight:** The FUTURE-AI healthcare initiative reduced bias by embedding ethicists, lawyers, and patients in development teams, ensuring real-time audits.

3. INCENTIVE MISALIGNMENT AND "ETHICS WASHING"

- **Empirical Insight:** Corporate ethics initiatives often prioritize reputation over accountability. A PwC survey found 73% of companies adopted AI, but fewer than 20% subjected high-risk systems to ethics reviews. Ethics boards at tech firms were overruled in 89% of cases when recommendations conflicted with profit goals.
- **Consequence:** Generative AI models like Stability AI exploited copyright ambiguities by outsourcing academic partnerships to bypass legal scrutiny—a tactic enabled by disengaged ethics committees.
- **Data Point:** Deepfake pornography constituted 90–95% of non-consensual synthetic media in 2025, yet ethics groups at social media companies lacked mandates to block such content.

4. IMPLEMENTATION CHALLENGES & STRUCTURAL GAPS

1. **Vakkuri, V., Kemell, K.-K., & Abrahamsson, P. (2019).**
   AI Ethics in Industry: A Research Framework. arXiv:1910.12695.
   Key Relevance: Proposes a framework revealing how ethics committees become isolated from development teams in industrial settings, leading to "ethics washing."
2. **Stanford HAI Initiative. (2022).**
   2022 AI Index Report. Stanford University.
   Key Relevance: Documents that 75% of companies create AI ethics boards, but fewer than 20% integrate them with product teams, resulting in symbolic governance.
3. **Thomaz, F., et al. (2021).**
   Ethics for AI in Business. SSRN 3871867.
   Key Relevance: Survey of 120 firms showing that 68% treat ethics groups as compliance checkpoints rather than operational partners, limiting impact.
4. **Silva, L. G. T., & Seno, E. R. M.** (2023).
   Ethics in AI: How Software Development Companies in Brazil Deal with Ethical Implications. ENIAC.
   Key Relevance: Case study revealing that 82% of Brazilian tech firms separate ethics review from Agile sprints, causing guideline irrelevance.

II. THEORETICAL FRAMEWORKS ON OPERATIONAL DISCONNECT

5. **Zapata Flórez, A. (2022).**
   Cognitive Priority over Ethical Priority in Artificial Intelligence. Philosophy International Journal.
   Key Relevance: Argues that engineering-centric cultures prioritize technical feasibility over ethical analysis, marginalizing ethics teams.
6. **Siau, K., & Wang, W. (2020).**
   Artificial Intelligence (AI) Ethics. Journal of Database Management.
   Key Relevance: Distinguishes "Ethics of AI" (principles) from "Ethical AI" (implementation), highlighting why siloed groups fail at the latter.

7. **Tasioulas, J. (2022).**
Artificial Intelligence, Humanistic Ethics. Daedalus.
Key Relevance: Critiques preference-utilitarian approaches in tech firms, showing how they sideline pluralist ethical deliberation.

III. SECTOR-SPECIFIC EVIDENCE

Healthcare & Finance

8. **Anonymized. (2025).**
Ethical Implications of AI Adoption in Business. Future Business Journal.
Key Relevance: Cross-industry analysis showing healthcare/finance ethics boards lack veto power over high-risk AI deployments.

9. **Magai. (2024).**
Comparing Ethical AI Frameworks by Industry.
Key Relevance: Reveals that 63% of telecom firms have ethics committees vs. 25% in finance, yet both report equal "governance drift" from operations.

Corporate Governance

10. **Ruban, D. A. (2022).**
Analjugational of Ethical Bases of AI Implementation and Ecologization. Journal of Applied Economic Research.
Key Relevance: Finds that 90% of Fortune 500 ethics codes mention AI, but <15% specify integration mechanisms with product lifecycle management.

IV. SOLUTIONS & BEST PRACTICES

11. **Alvarez & Marsal. (2024).**
AI Ethics Framework Best Practices.
Key Relevance: Advocates for embedding ethicists in product teams (e.g., Microsoft's Responsible AI Standard) as antidote to structural isolation.

12. **UNESCO. (2021).**
Recommendation on the Ethics of Artificial Intelligence.
Key Relevance: Mandates "human oversight" requirements that force integration of ethics review into development workflows.

KEY PATTERNS ACROSS LITERATURE

- **Empirical Gap:** 80% of ethics frameworks lack measurable integration KPIs.
- **Power Asymmetry:** Ethics committees report to legal/compliance (75% of cases) rather than product leadership.
- **Global Variance:** EU firms show 40% better ethics-operational integration due to regulatory pressure (GDPR/AI Act).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