OUTSOURCED AND AUTOMATED

How AI Companies Have Taken Over Government Decision-Making

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About EPIC

The Electronic Privacy Information Center (EPIC) is a 501(c)(3) non-profit public interest research advocacy center in Washington, D.C. EPIC was established in 1994 to focus public attention on emerging privacy and civil liberties issues. EPIC advocates for privacy, algorithmic fairness, and government accountability.

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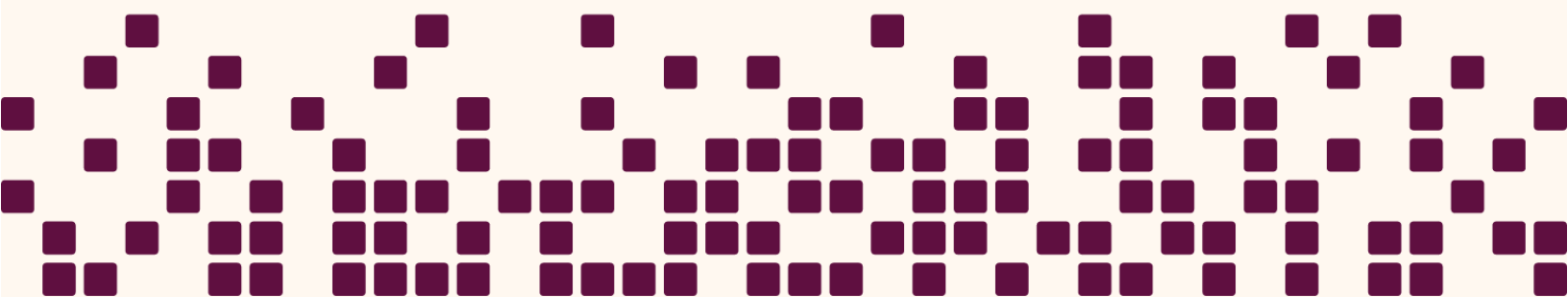
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Introduction

The next time you send your children to school, get stuck in traffic, or seek out government services, pay close attention to the technologies you encounter. Are there cameras in school corridors or license plate readers along state roads? If you have applied for government benefits like unemployment insurance, did you receive an automated reply or rejection? Or perhaps you have seen these technologies in action without realizing—automated systems that work behind the scenes to detect fraud, predict crime, allocate public benefits, and generate government documents?

You are not alone. Across the country, state and local governments are experimenting with AI tools that outsource important government decisions to private companies, all without public input or oversight. These systems assign children to schools, inform medical decisions about patients, impact policing decisions about where to patrol and whom to target, and determine who receives public benefits. And they do this all using products and services developed by private companies like Thomson Reuters, Deloitte, and LexisNexis. In other words, an increasing number of important government decisions are being made by private companies' AI systems.
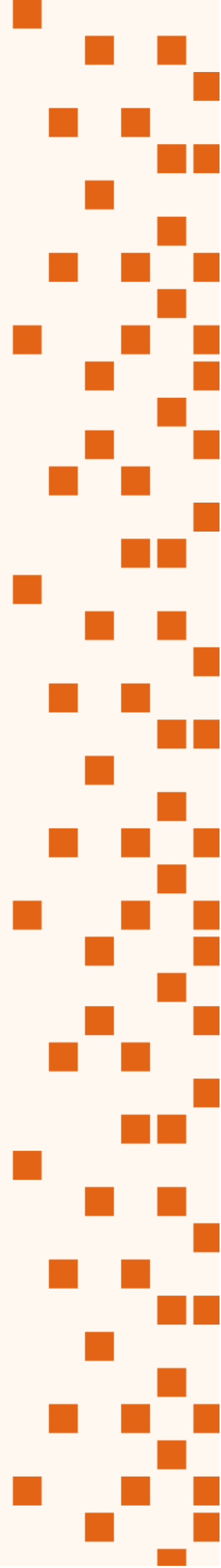
How did we get here? Facing a mix of austerity measures, hiring challenges, and government modernization efforts, many state and local agencies have turned to AI companies promising greater efficiency and cost savings. But AI systems are different from other products and services traditionally purchased through government procurement: they displace agency decision-making and discretion, often in ways that are difficult to decipher and manage.[1] Despite these differences, agencies still use the same procurement process to purchase everything from AI systems to elevators, printers, and security cameras. And the policies behind procurement decisions—competition, efficiency, privatization, and more—do not support the oversight and accountability necessary to manage AI risks and delegated decision-making authority.[2]

This report sheds light on the strange, new world of government AI procurement, highlighting how agencies across the country have outsourced their decisions to private companies. It builds on over two years of EPIC research into the systems, contracts, and private companies involved in making key government decisions across the country,[3] and in so doing, highlights
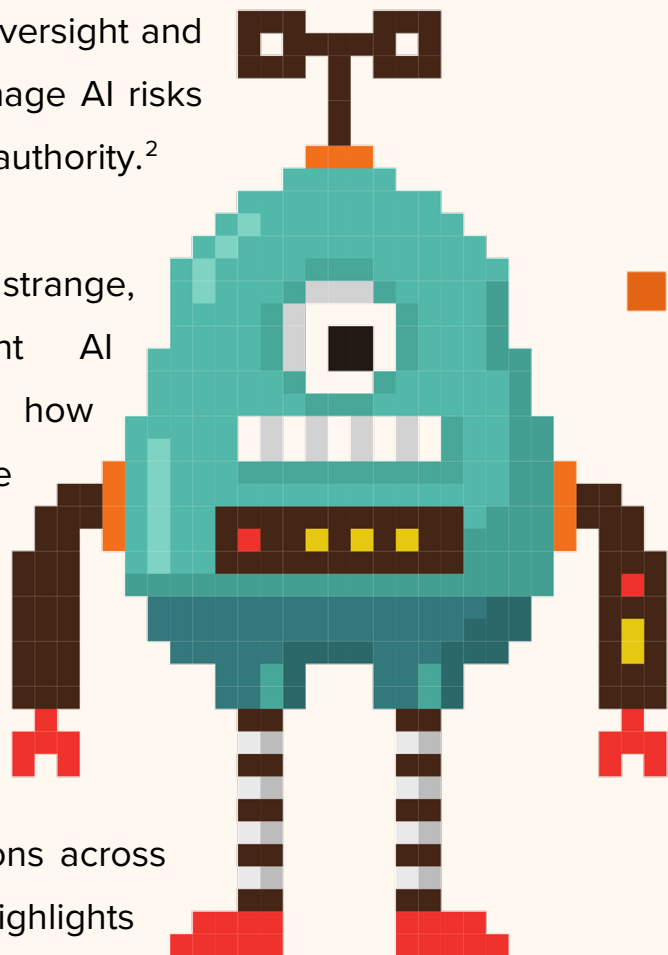
the ways that AI procurement alters and obscures both government decision-making and government accountability efforts.

In this report, we combine extensive research into state AI contracts, compiled via open record requests and public contracting databases, alongside independent research and interviews with procurement experts, government officials, and legal aid organizations facing the impacts of automated decisions. Our goal is not to encompass the entire universe of government AI procurement, but instead to highlight national trends, key players, and critical issues at the core of our government's algorithmic turn—and then offer suggestions on how government can improve.

Automated tools can be risky, and we need real AI oversight if government agencies intend to rely on them.
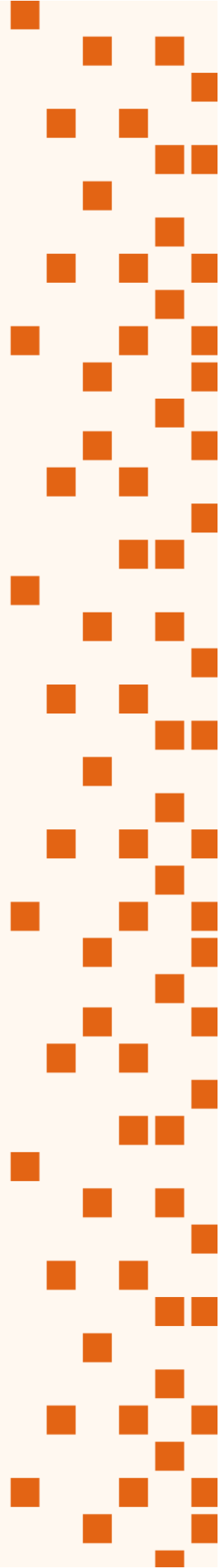
Part One
The Risks of Government AI
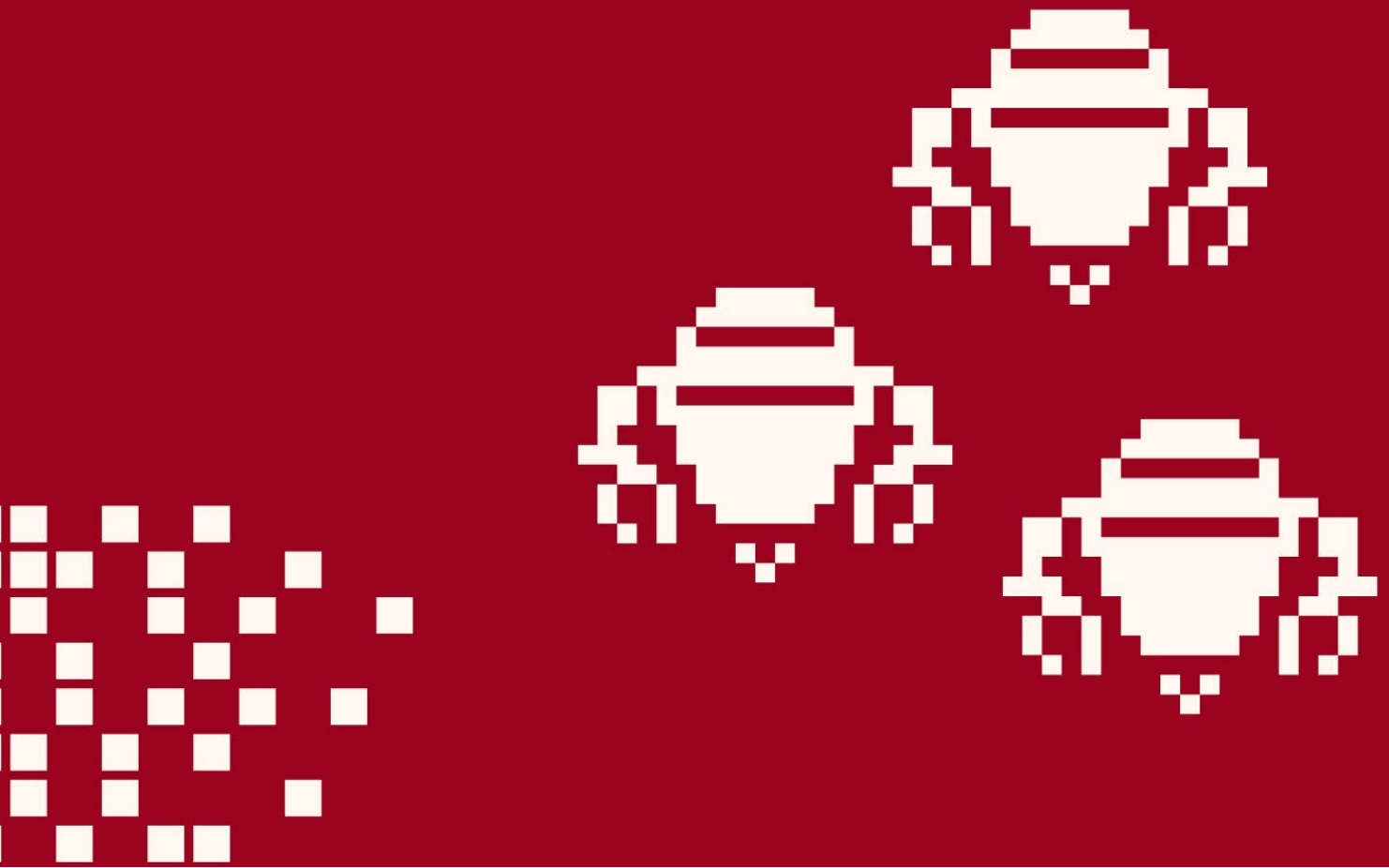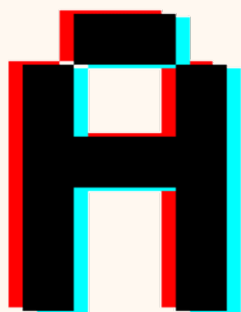
At all levels of government, administrative agencies are granted authority to exercise a wide variety of governmental powers. State Departments of Corrections oversee many aspects of the criminal justice system, including municipal and state jails. Departments of Human Services, Employment Services, Health Services, and similar agencies administer state and local welfare programs like Unemployment Insurance, Medicaid, and the Supplemental Nutrition Assistance Program. State Departments of Education oversee public schools and other educational programs.

The government services these agencies provide are the backbone of state and municipal government, ensuring that core public services are maintained. But over the past two decades, many of these agencies have outsourced their services and decisions to automated tools developed by private vendors.[4] From automated facial recognition systems to applicant screening systems and fraud detection algorithms, private AI tools and other automated decision-making systems are now used to aid or replace human decision-making within agencies across all fifty
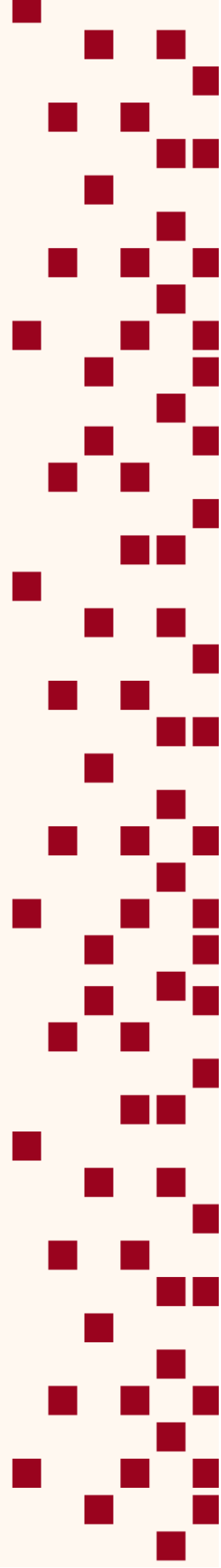
states and multiple territories.[5] Government by AI is no longer the subject of science fiction—it is here.

What prompted so many state agencies to procure AI systems? The answer is largely political. Longstanding debates around government austerity and budget deficits often left state agencies underfunded, understaffed, and overburdened[6]—even as demand for public benefits increased.[7] At the same time, politicians in states like Indiana targeted public benefits programs as "irretrievably broken, wasteful, and fraudulent."[8] To these politicians, privatizing government services was cheaper and more effective than the status quo.

EXPLAINER

What's in a Name: Defining "AI Systems"

Experts disagree on the terms and definitions used to describe the systems that government agencies use to automate their processes and decisions. Some limit their definition to fully autonomous systems making complex decisions, while others include even simple algorithms following a set of human-made rules—algorithms that act much like flowcharts. Rather than focus on specific processes and models, this report takes a functional approach to automated systems; throughout this report, the term, **"AI system,"** is used to describe any system that automates a process, aids human decision-making, or replaces human decision-making—including simpler automated decision-making systems.

For their part, many private contractors played into this privatization myth.[9] As state governments released requests for proposals (RFPs) to outsource and automate government services like public benefits programs, AI and data companies touted the promise of new, automated services as solutions to the challenges facing state agencies. In its proposal to the D.C. Department of Human Services, for example, Thomson Reuters-owned Pondera Solutions wrote that its automated fraud detection product, FraudCaster, would be a "force multiplier" for the agency:

> *"With limited resources and a constant influx of new referrals, [Department of Human Services] managers and investigators will leverage FraudCaster to… identify prior behaviors and patterns of fraudulent behavior. This leads to the assignment and prioritization of the true highest value cases."*[10]

Although AI contractors promise accurate, fair, and effective systems, the reality of government-procured AI systems often falls short. Faced with funding and staffing shortfalls, many government agencies are forced to rely on automated systems to make important policy decisions without understanding why those decisions were made. These decisions remove discretion from public-facing agency employees like case workers, who must rely on restrictive AI recommendations and complicated
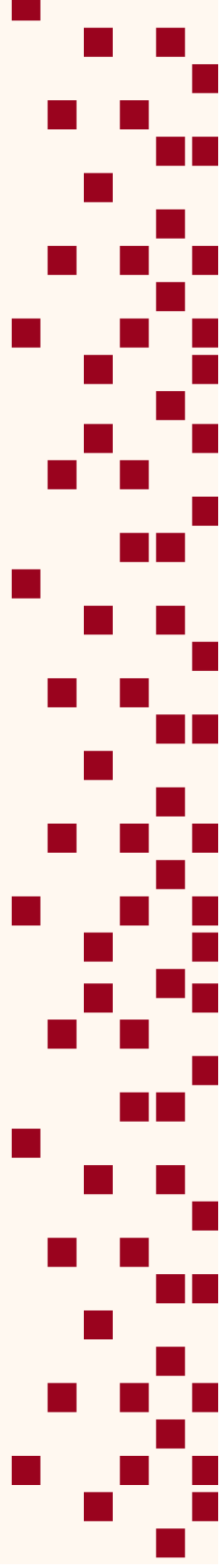
technological systems in lieu of their own expertise.[11] When the outputs of AI systems are flawed or biased, neither agencies nor impacted individuals have the information they need to correct the errors. AI vendors routinely keep this information private using trade secret laws and contractual provisions, even when disclosing information about an AI system's technical processes and training data could mitigate harm.[12] Far from being administrative panaceas, private AI systems tend to diminish accountability from core government processes—and impose new and pressing risks on the individuals who rely on government services.

Part One of this report highlights three of these risks:

1. Risks involving **data use and data privacy**;

2. Risks involving the **accuracy, bias, and reliability of outputs**; and

3. Risks that undermine **government authority and accountability**.

Together, these risks suggest that the automated decision-making systems that state agencies across the country use are far less reliable, far riskier, and far more costly than policymakers may believe.

A Taxonomy of Government AI

How do state governments use AI? Although different states have different rules and processes for deploying AI and automated decision-making systems, many agencies rely on some form of automation to carry out core decision-making functions. Four common functions of government AI that impact decisions about people include:

1. **Risk Scoring:** AI systems used to make risk determinations about individuals, like someone's likelihood to drop out of school or reoffend after being arrested. Many of these risk determinations employ rubrics or numerical scores.

2. **Eligibility Screening:** AI systems used to screen individual applicants for government services by matching the information individuals provide—or information gleaned from government and commercial databases—to eligibility criteria.

3. **Fraud Detection:** AI systems that match applicant-provided information to information within government and commercial databases and flag inconsistencies that may suggest fraudulent activity.

4. **Predictive Policing:** Some AI systems, including automated surveillance systems and geographic crime mapping systems, are employed by state governments to surveil public spaces for violations of the law.

EXPLAINER [CONT'D]

The automated systems used to perform these functions can vary in complexity as well. EPIC has identified at least three levels of complexity in government AI:

1. **Simple rules-based algorithms**, which automate the process of screening applicants for government benefits using pre-set eligibility criteria.

2. **Machine-learning algorithms**, which can create their own rules from large swaths of training data, used for functions like fraud detection.

3. **Generative AI systems**, which use extensive training data and computing power to auto-generate content for things like support chatbots or applicant communications.

Privacy Risks: How AI Uses & Abuses Your Data

Do you know where your data goes? Or even what data exists about you? From the moment you are born—and sometimes even before[13]—your life is tracked, digitized, and commodified.[14] Your name, birthdate, and place as birth, as well as the names, addresses, birthdates, and occupations of your parents, are recorded in birth certificates and other public records. Your health data is scooped up by connected devices and child-rearing apps[15] or bought and sold to private companies as health records.[16] And

even decisions like what you watch and where you go are captured, recorded, and incorporated into commercial databases.[17] Your data is valuable—and AI vendors are selling and using it every day to make important decisions about you.

The privacy risks of government AI systems come from the ways that government agencies and private contractors use and abuse your personal data. For example, when a government agency uses your personal data without your consent, the agency undermines the control you have over your data. This is what Professors Danielle Citron and Daniel Solove call an "**autonomy harm**."[18] When you are denied the freedom to decide how your data is used—including whether and when private vendors can access your data or whether an agency will use data from commercial databases to make decisions about you—your privacy is undermined.

Unfortunately, many people who need government support cannot access that support without providing their data to government agencies. To apply for public benefits like SNAP, TANF, and LIHEAP, individuals need to provide detailed information about their household, income, employment history, and more. This information is stored in government databases—and agencies may use your data for

> *"Your data is valuable—and AI vendors are selling and using it every day to make important decisions about you."*

other purposes. This inherently fuels a troubling dynamic where exercising rights and entitlements from the state puts you at a privacy and autonomy disadvantage. In her book, *Automating Inequality*, Virginia Eubanks chronicles how automated welfare management systems in states like New York and Indiana were used not only to manage public benefits programs, but also to cut welfare rolls and police welfare recipients.[19] For millions of Americans, accessing government services can entail unwanted surveillance and scrutiny.

When agencies use AI systems to help make public benefits determinations, providing AI vendors with access to government data is not the only source of privacy risks. To build and maintain many government AI systems, private AI developers rely on commercial databases as well. These databases are a composite of information derived from several different sources: text files called "cookies" surreptitiously collect and store your information as you surf the web,[20] online platforms like Facebook and Tiktok compile detailed user profiles about based on the information you provide and your behavior on the platforms,[21] and data brokers—the companies that trade in your data—collect and compile all of your information into databases that anyone can purchase.[22]

Across the country, AI systems procured by government agencies are built on top of this commercial data, meaning that information you did not provide to the government—including your social media posts and browsing behavior—can influence the decisions
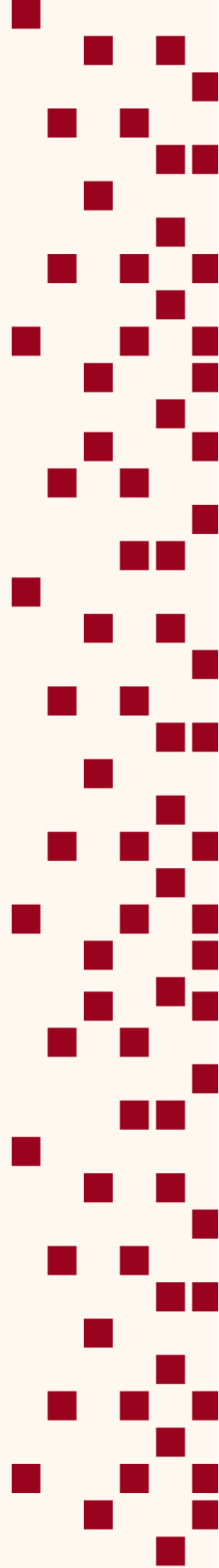
that government AI systems make about you. Consider RentGrow, an automated tenant screening service used by the D.C. Housing Authority. As part of its service, RentGrow not only collects information about applicants through cookies and public databases, but also purchases data about applicants' social media profiles and "intent data": data about their behavior.[23]

"Information you did not provide to the government—including your social media posts and browsing behavior—can influence the decisions that government AI systems make about you."

In fact, some of the companies contracting with state governments to provide AI systems are data brokers themselves. Companies like Thomson Reuters, LexisNexis, and Deloitte build AI systems and analytics platforms on top of databases they maintain themselves.[24] And these AI systems are some of the most common tools used by state governments. For example, Thomson Reuters' Fraud Detect product, which claims to detect and prevent public benefits fraud by analyzing data about benefits recipients, is available to 42 different states across the country, as well as the District of Columbia and Guam.[25] And similar to RentGrow, Thomson Reuters pulls data from location services, credit reporting agencies, social media scrapers, public databases, and other data brokers' databases to train and operate their fraud detection model.[26] These commercial

surveillance practices are at the core of most government AI systems, undermining your privacy in the process.

Government AI systems can also expose your personal data to cybercriminals. Every time your data is collected, processed, or used within an AI system, there is a risk that it will leak to be misused. In many government AI contracts, however, agencies permit vendors and their subcontractors to access, process, and use your personal data within their AI system—and this access can cause harm. In 2021, Deloitte's uFACTS system was breached by an employee of a subcontractor, who accessed unemployment insurance applications in Ohio and removed fraud flags in exchange for money.[27] Government agencies are not immune to cybersecurity threats either. In the same year as Deloitte's data breach, for example, the Washington Metropolitan Police Department suffered a ransomware attack that gave hackers detailed information about agency personnel.[28] Without proper safeguards in place, outsourcing agency decisions to private AI systems exposes your data to several cybersecurity risks—all without your consent.

"Without proper safeguards in place, outsourcing agency decisions to private AI systems exposes your data to several cybersecurity risks."

CASE STUDY

Deloitte's Eligibility Screening Tools

Consider this scenario: you were just fired from your job, and now you want to apply for unemployment insurance. In several states—including California, Colorado, Illinois, Michigan, New Mexico, New York, Ohio, Virginia, and Wisconsin—your application would first be screened by Deloitte's automated eligibility screening system, the **Unemployment Insurance Framework for Automated Claims and Tax Services (uFACTS)**.

The uFACTS system, which also includes identity verification and fraud detection capabilities, connects the data you provide to your state government with Deloitte's own proprietary database. The system then automatically evaluates your eligibility for unemployment insurance using its proprietary source code and data tables. In some cases, your application for unemployment benefits may be rejected without any human review.

There are far-reaching privacy concerns with private screening systems like uFACTS. For the system to work, state agencies need to give Deloitte access to extensive data about benefits applicants—data that Deloitte in turn incorporates within its own commercial database. This data transfer happens without the express consent of applicants, and often exposes sensitive personal data to new cybersecurity vulnerabilities. In 2021, for example, Ohio's uFACTS system was breached by an employee of one of Deloitte's subcontractors, Randstad. Even after the employee was fired, she could still access individual applications and remove fraud flags.

Accuracy Risks: When AI Makes Mistakes

Relying on automated decision-making is a policy choice—and often one that agencies make without understanding how AI systems operate.[29] The accuracy, reliability, and effectiveness of an AI system depends entirely on the data used to train and operate the system, the analytic technique used to produce system outputs, and the system's programmed risk tolerance.[30] Without proper safeguards and oversight, AI systems can produce outputs that are flawed, biased, or overly simplistic.[31] In fact, AI systems can make decisions that are less accurate and more biased than their human counterparts.

At their core, the AI systems that government agencies use are assumption machines: they make predictions, recommendations, and evaluations about people based on assumptions gleaned from large databases. A Medicaid system may assign medical support to an individual based on what similar individuals typically need. A pre-trial risk assessment algorithm may flag a criminal defendant as a flight risk based on what similarly positioned defendants have done. And while automating government decisions may seem efficient, the assumptions that AI systems make are often wrong and can be harmful to the public.

Because AI systems make inferences about people based on average trends in data, their outputs are *generalizations* about how people behave. When an AI system is used to make
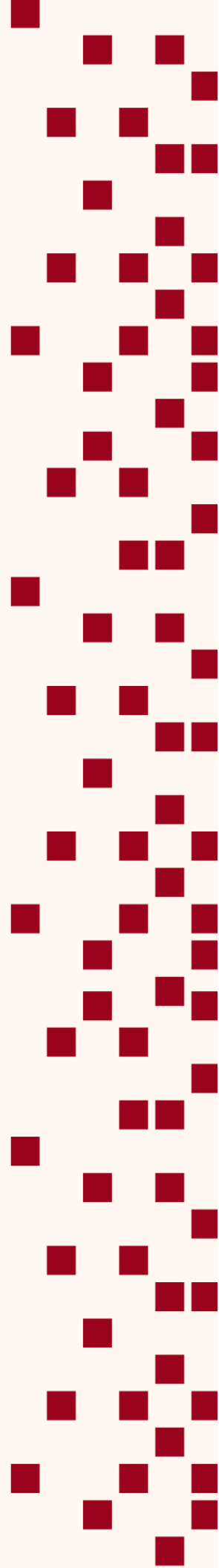
determinations about someone who falls outside the mean, the difference between a generalization and reality can undermine government decision-making; where a human case worker might see nuance, an AI system sees just one more data point. In Florida, these generalizations came to a head when the state procured a criminal risk assessment tool, the Correctional Offender Management Profiling for Alternative Sanctions (COMPAS), from a company called Northpointe.[32] The COMPAS system was designed to assess the recidivism risk of criminal defendants along two dozen "criminogenic needs" factors like "criminal personality," "social isolation," and "substance abuse."[33] But the system's assumptions about predictors of criminal behavior were flawed: a 2016 ProPublica report found that only 20% of the people predicted to commit violent crimes by COMPAS went on to do so.[34] More often, the system flagged defendants as likely reoffenders based on their race; black defendants were given high recidivism risk scores almost twice as often as white defendants, leading to higher bail and longer jail sentences.[35]

Beyond overgeneralizations and system errors, AI systems can exhibit harmful biases that undermine government decision-making. Because these systems are trained to recognize patterns in historical data, any historical biases will be reflected in AI
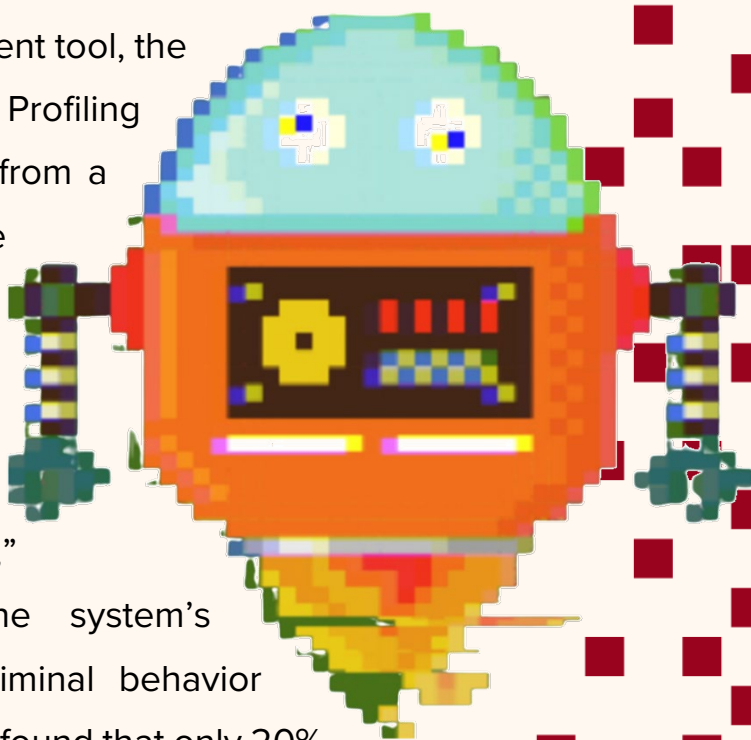
decisions.[36] Past housing data can encode historical redlining into these systems. Criminal history data will reflect racialized policing practices. Even seemingly innocuous data points like ZIP codes and last names can serve as "proxy variables" for race and racial discrimination within AI systems.[37] When government AI systems base their determinations on biased data, their outputs can perpetuate harmful biases and strip marginalized beneficiaries of the government benefits they deserve.

Part of what makes these accuracy risks so dangerous is that many government AI systems operate without much human oversight and without meaningful opportunities to dispute their outputs. Most companies that provide AI systems to government agencies maintain that the logic of their systems is proprietary, so agencies are forced to rely on contractors to operate AI systems without understanding how those systems function.[38]

"When government AI systems base their determinations on biased data, their outputs can perpetuate harmful biases and strip marginalized beneficiaries of the government benefits they deserve.."

Without understanding how automated decisions are made, neither agency officials nor the public can readily challenge inaccurate or biased AI decisions. In fact, many agencies do not even keep records of what problems the AI

systems are designed to address and how to measure their success.[39] Without greater transparency, those harmed by government AI systems will not have the information they need to dispute automated decisions and seek redress.[40] And there are several steps that agencies can take to verify the accuracy of AI outputs, including vendor reporting requirements,[41] independent AI audits,[42] and other, more technological processes for verifying the legal compliance of AI systems.[43]

CASE STUDY

The Michigan Integrated Data Automated System (MiDAS)

Overgeneralizations are not the only accuracy risk that government AI systems impose. Many government AI systems can include errors as well—and no agency knows this better than Michigan's Unemployment Insurance Agency.

In 2013, the Unemployment Insurance Agency paid Fast Enterprises $47 million to build and operate the Michigan Integrated Data Automated System (MiDAS), an automated unemployment insurance system that included fraud detection capabilities. The system was meant to modernize and streamline Michigan's unemployment insurance programs, but systemic errors and design mishaps soon began to appear. If an applicant missed a field in their application, MiDAS would automatically flag them for fraud. When MiDAS calculated an applicant's income, it incorrectly used the applicant's entire income instead of their individual paychecks, causing the system to flag even more...

CASE STUDY (CONT'D)

...applicants for fraud. And when anyone tried to dispute the system's determinations, the questionnaire they were given was pre-populated with responses that would yet again flag them for fraud. In total, MiDAS falsely accused over 40,000 Michigan residents of fraud, all because of errors in the design of the system.

Just three years after procuring MiDAS, the Michigan Unemployment Insurance Agency was forced to stop relying on the system's automated determinations as part of a settlement agreement—and in 2022, the agency agreed to transition from MiDAS to Deloitte's uFACTS system, paying an additional $78 million in the process.

Accountability Risks: Undermining Government

How can we tell when a government AI system makes an error? How do we know the process it uses is not discriminatory or otherwise illegal? The short answer is that we cannot—or at least, not directly. When a government agency procures an AI system to make decisions about you, it also outsources its decision-making to a private vendor. And those vendors can keep the procedures their AI systems use to make decisions a secret by claiming that the software and machine-learning models behind

their AI systems are "proprietary business information."[44] For example, when EPIC submitted an open records request to the Illinois Department of Employment Security concerning Pondera's unemployment fraud detection system, Illinois withheld several documents on the grounds that they were "proprietary and confidential."[45] Widespread AI procurement and protections for trade secrets mean that many government AI systems operate without meaningful public oversight.

> *"Widespread AI procurement and protections for trade secrets mean that many government AI systems operate without meaningful public oversight."*

Administrative law is not prepared for AI decision-making. As Professors Ryan Calo and Danielle Citron explain in their article, "The Automated Administrative State: A Crisis of Legitimacy," state legislatures granted government agencies broad authority over important government functions because agencies were supposed to maintain greater subject matter expertise, respond faster to emerging issues, and exercise greater discretion over individual matters than a legislature could itself.[46] In contrast to elected officials, who must juggle competing priorities and political pressures, agency officials could be experts in their field who are able to dedicate the time and expertise necessary to oversee and address the nuanced policy issues facing government today.[47] And when the traditional legislative process was too slow to respond to changing circumstances or

emergencies like the COVID-19 pandemic, agencies could rapidly respond.[48] The growth of agencies—known as the "Administrative State"—is a central part of today's government.

The growth of the Administrative State has not gone without criticism,[49] but many scholars and courts alike have defended the existence of administrative agencies on the practical assumption that agency expertise and discretion are needed for governments to operate in today's complicated, fast-paced world.[50] Over the last few decades, however, agencies' adoption of AI systems has challenged this assumption. As Professors Ryan Calo and Danielle Citron describe, "[a]gencies are invested with governing authority (over the objections of many) due to their unique capabilities and knowledge, and now they are turning that authority to machines."[51] In effect, many government agencies now rely on automated technologies to make important government decisions—and many of the legal tools used to hold agencies accountable are not keeping up.[52] If the AI systems making important government decisions are hidden behind trade secret law, how do we know when a government decision is fair, accurate, or unbiased? And how do agencies know if AI decisions are fair if they rely on AI systems without understanding how they work?
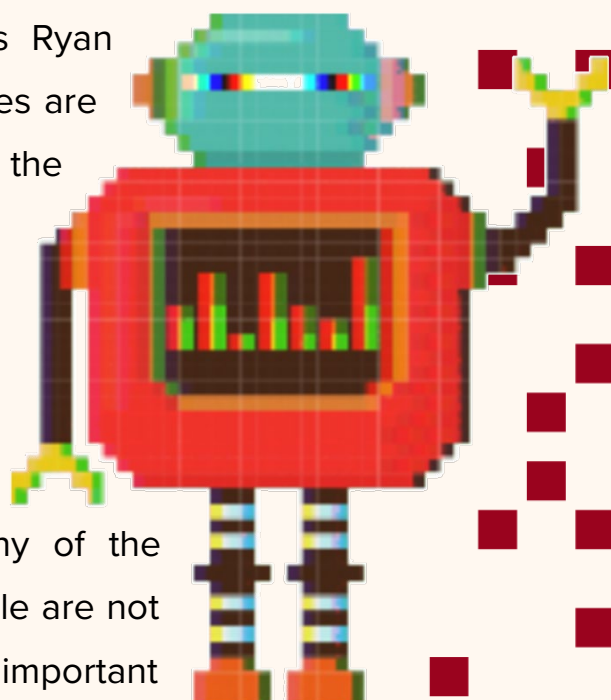
The accountability risks of government AI systems come from the ways that they displace processes for holding our government accountable. As Deirdre Mulligan and Kenneth Bamberger point out in their article, "Procurement as Policy: Administrative Process for Machine Learning":

> "When the adoption of [AI] systems is governed by procurement, the policies they embed receive little or no agency or outside expertise beyond that provided by the vendor. Design decisions are left to private third-party developers. There is no public participation, no reasoned deliberation, and no factual record, which abdicates Government responsibility for policymaking."[53]

Outsourcing government decisions to private AI systems goes beyond who or what is making decisions about you; it involves a shift in *how* government accountability operates. When an agency official makes a decision that affects you, there are opportunities for public comment, hearings, or a record supporting the decision. When private vendors make these decisions, agencies and the public are left to rely on procurement procedures and vendor disclosures for accountability. These procedures are not designed to provide substantive oversight over government decision-making, but to promote competition, efficiency, and risk avoidance.[54] And when an AI decision *is* challenged, the judges and administrative law judges tasked with
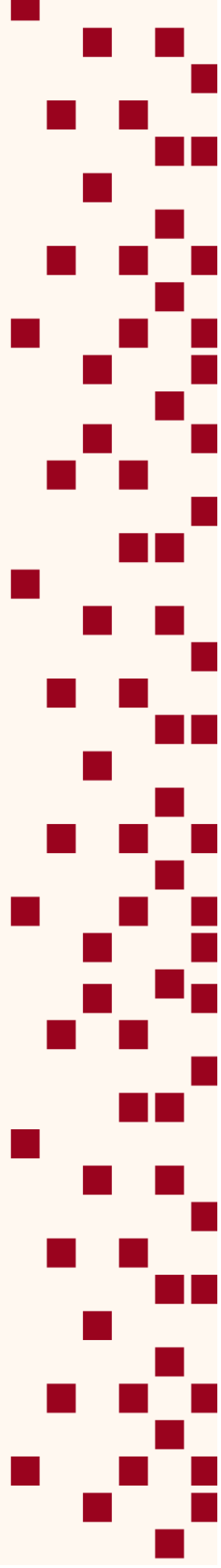
adjudicating the matter often side with AI systems, as they tend to *appear* more objective than the evidence provided by caseworkers or individual beneficiaries.[55]

AI ON TRIAL

Loomis v. Wisconsin

In 2016, Eric Loomis challenged Wisconsin's use of the **COMPAS pre-trial risk assessment system**. He argued that the court's partial reliance on COMPAS to set his criminal sentence violated his right to due process under the Fourteenth Amendment, which provides individuals the rights to an individualized sentence and a sentence based on accurate information. The Wisconsin Supreme Court agreed with Loomis, saying that COMPAS generated a risk score based on aggregate criminal data, not his individual data, but ultimately ruled against him because the lower court considered other factors in addition to the COMPAS risk score. Despite evidence that COMPAS produced faulty and discriminatory risk scores, courts could continue to use the system so long as they considered other factors too.

Loomis petitioned the Supreme Court to review his case in 2017 but was denied. In opposition to his petition, the U.S. Solicitor General wrote that Loomis' challenge, which raised issues with COMPAS's gender bias, was unfit for Supreme Court review because "it is unclear *how* COMPAS accounts for gender." At no point during Mr. Loomis' case did a court question how the COMPAS system used constitutionally relevant variables; neither the state of Wisconsin nor the U.S. Solicitor General knew.

The AI Vendor Landscape
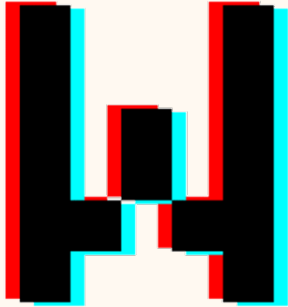
W e encounter automated decision-making in almost every aspect of our lives. When you apply for a loan, read the news, commute to work, go to the doctor, check social media, or do any number of other daily tasks, an AI system is probably making decisions about who you are and what you should be able to access. Many of today's largest companies—Netflix, Citibank, Google, Amazon, etc.—rely heavily on AI systems to make important decisions. The same is true for our government. Every day, government agencies rely on privately developed AI systems to make important decisions about who we are and how we should be treated: AI systems assign children to schools, inform medical decisions about patients, impact policing decisions, determine who receives public benefits, and more.

> *"Every day, government agencies rely on privately developed AI systems to make important decisions about who we are and how we should be treated."*

Several state agencies build and maintain their own AI systems. In 2020, for example, the Center for Democracy & Technology

identified 90 AI systems used in state disability benefits programs, many of which were developed or managed internally by agencies.[56] However, all fifty states contract with private companies to develop and operate AI systems as well. These systems aid or replace human decision-making in core government functions like public benefits administration, public education, and pre-trial detention. But their role in government is relatively new.

> *"Agencies can—and do—successfully oversee government programs without relying on private companies and AI systems."*

The first "computerized systems"—rudimentary computer programs for verifying welfare applicant data—appeared within state agencies in the 1970s, when states like New York and Louisiana used welfare management systems to reduce welfare rolls.[57] However, broad adoption of state AI systems only began in earnest during the twenty-first century.

Today, agencies across the country are using these systems for everything from simple process automation to surveillance and fraud detection. Scholar Virginia Eubanks calls this growing network of government surveillance and AI a "digital poorhouse": a nationwide web of microphones, cameras, fingerprint scanners, algorithms, and assessments that disproportionately target low-income communities.[58] First built to cut agency costs in the face of greater demand for public services, AI vendors have woven their systems throughout government and support everything

from education and public health to housing, welfare, and the criminal justice system.[59]

Outsourcing and automating government programs is not the only way for state agencies to meet the needs of their residents. Rather, it is the latest in a growing effort by politicians and lobbyists to privatize public functions.[60] Agencies can—and do— successfully oversee government programs without relying on private companies and AI systems. Since 1995, for example, Oregon's Department of Human Services, Aging & People with Disability (APD) has used its own network of digital systems to successfully administer long-term care services under Medicare and Medicaid.[61]

Part Two of this report surveys the modern AI procurement landscape, highlighting why AI procurement is so common today—and why it can be so difficult for agencies to divest from private AI systems.

There are three main reasons why government AI procurement has become so commonplace:

1. **Modern procurement methods are ill-suited to AI systems**, making it easier for agencies to adopt AI systems that claim to be efficiency-boosting, innovative technologies without maintaining oversight over AI decisions;
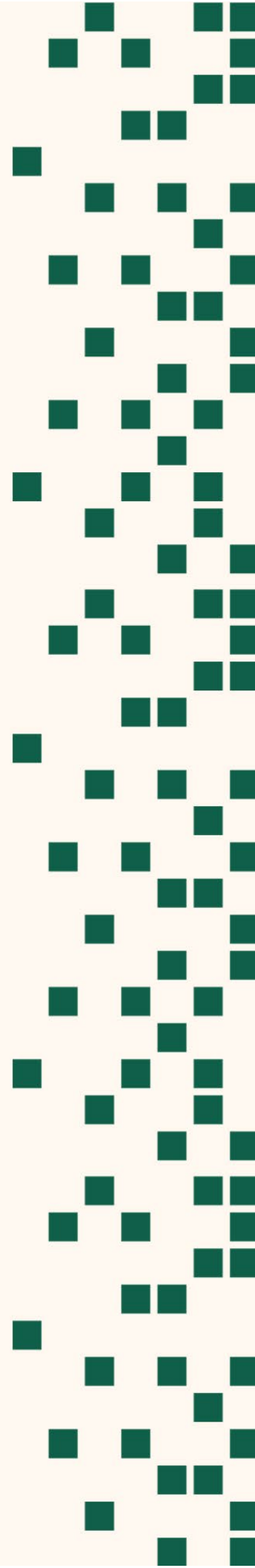
2. **Many of today's largest AI vendors aggressively market their systems to state agencies and state legislatures**, creating political pressure to adopt AI systems; and

3. **State agencies struggle to attract employees with AI expertise**, so when agency officials or policymakers want to automate or modernize agency processes, they must rely on AI vendors.

Bidding Optional: Different Paths to Procurement

How have private AI systems woven themselves so deeply into state agency processes? The short answer is that agencies are facing pressure to meet higher expectations and public demand for government services with fewer resources.[62] Powerful companies like LexisNexis, Maximus, and Deloitte have lobbied to fill the gap left by austerity measures, developing automated risk analytics, prediction, case management, and surveillance services catered toward state and local agencies.[63] The process that agencies undertake to purchase these AI tools is known as government procurement.

What exactly is procurement? When an agency faces a problem that it cannot solve by itself, it may turn to the private sector for solutions. This process can take several months or even years,[64]
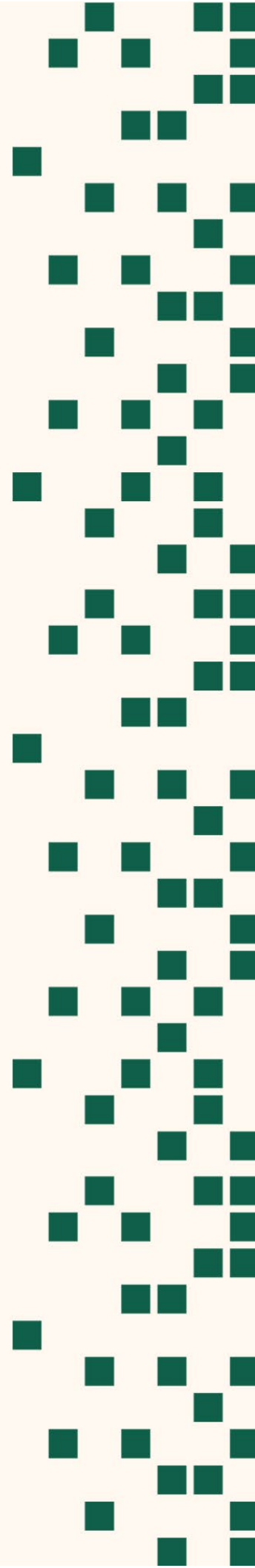
spanning initial research, vendor solicitation, bid review, and contract negotiation. The procurement process can take one of three paths: competitive bidding, emergency exemptions from competitive bidding, and cooperative purchasing agreements.

Path 1: Competitive Bidding

Under the most common form of procurement—**competitive bidding**—the process of soliciting, reviewing, and selecting vendor proposals is designed to be fair and open. In theory, any company can review an agency's solicitations—frequently called "**requests for proposals**" or **RFPs**—and submit its own bid for the agency contract. The agency would then review all the vendor submissions it receives and select the best option given its own set of bid evaluation criteria (e.g., cost, effectiveness, and size of business) or reopen the process for more submissions. Once a proposal is selected, the agency and chosen vendor enter contract negotiations to iron out what exactly the vendor will do—and what rights they both have. The parties may negotiate how long the contract term will be, whether the parties can renew, who has ownership over the AI system and the data it produces, what will happen if the vendor misses deadlines, and so forth.
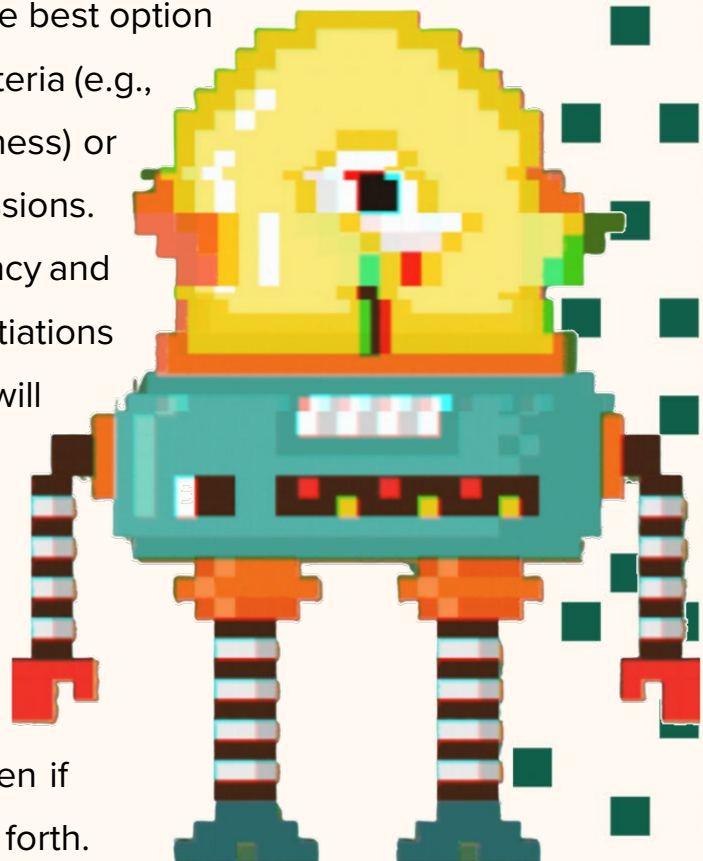
Although the competitive bidding process is designed to be fair and transparent, it has a major flaw: it favors large AI vendors with the resources and data to outcompete smaller firms. Drafting and submitting competitive bids can take a lot of time and resources, meaning that larger or more established companies may produce stronger bids regardless of the quality of their products or services.[65] On top of that, AI systems depend, in part, on the amount and quality of training data they use to recognize patterns and make predictions. Companies

"Agencies are facing pressure to meet higher public demands with fewer resources—and powerful companies... have lobbied to fill the gap left by austerity measures.

with greater access to data, including data brokers like Thomson Reuters and LexisNexis, can train more sophisticated AI systems and create additional barriers for small competitors.[66] Despite its flaws, however, competitive bidding is still the most transparent process for procuring AI systems. In fact, EPIC was able to identify over 600 AI contracts around the country in large part because of state contracting databases operated as part of the competitive bidding process.

Path 2: Exemptions from Competitive Bidding

Although competitive bidding is the standard path, several statutory exemptions exist as well. These exemptions typically permit agencies to contract with specific vendors without going

through a bidding process. Exemptions vary from state to state, but most are meant to **expedite procurement for routine services**, **provide flexibility for low-cost contracts**, or **facilitate government responses to emergencies**.[67] During the COVID-19 pandemic, for example, many states relied on pandemic-era public health exemptions to rapidly procure AI systems to keep government services afloat.[68] With increasing reliance on existing services like Medicaid and Unemployment Insurance and $150 billion in federal COVID-19 relief,[69] state agencies felt extreme pressure to improve their welfare processes as quickly as possible—and AI companies jumped at the opportunity. The first company to develop an AI system to administer Pandemic Unemployment Assistance (PUA), Deloitte, reaped most of the benefits.[70] At the height of the pandemic, Deloitte contracted with at least eight states to deploy its unemployment claims management system, uFACTS, making over $410 million without going through a competitive bidding process.[71] While emergency exemptions favor the first vendors to develop an AI system, they also limit the time agencies have to vet vendors and their products, increasing the risk of procuring faulty or biased AI systems.

Path 3: Cooperative Purchasing

Another exemption—sometimes called a **"master service agreement"** or **"cooperative purchasing agreement" exemption**—has been used extensively to place AI systems
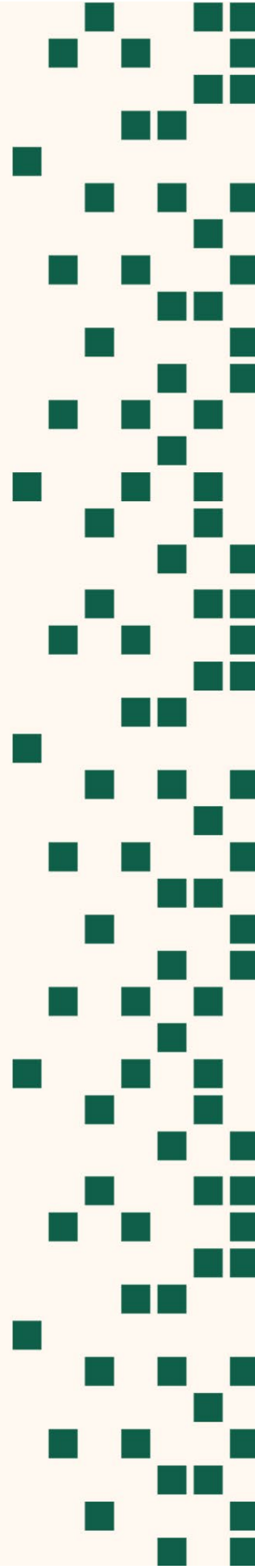
within state agencies. Under cooperative purchasing, a private company negotiates with multiple contractors to create a central portfolio of government product and service offerings governed by a single "master agreement." That portfolio company then contracts with a "lead state," which negotiates the master agreement on behalf of several other states. The result: a single procurement process can place hundreds of AI systems within dozens of state agencies, all without a competitive bid process.

The National Association of State Procurement Officials (NASPO) is one such portfolio company, boasting hundreds of thousands of IT product and service offerings, including hundreds of AI

> **"The result of [cooperative purchasing agreements]: a single procurement process can place hundreds of AI systems within dozens of state agencies."**

services ranging from basic software automation to eligibility determinations and generative AI tools.[72] In fact, many of the largest AI vendors—including Deloitte, Thomson Reuters, and LexisNexis—are represented in NASPO's portfolio under vaguely labeled Software-as-a-Service (SaaS) portfolios.[73]

While cooperative purchasing is designed to facilitate faster, cheaper, and more effective procurement, it sacrifices important transparency and accountability measures in the process. Portfolio companies like NASPO contract with all fifty states, rapidly incorporating thousands of IT products and AI services

into state agencies without competitive bids, transparency, or individualized contract negotiations. In fact, EPIC's research found that procurement officials in at least 42 states agreed to cooperative purchasing agreements that could funnel **over $184,000,000** to dozens of AI vendors.

Unlike other IT services like file management or cloud hosting, AI systems impose unique risks on government agencies: they change the ways that government agencies interact with individuals,[74] produce inferences and predictions based on public data,[75] and work in opaque and sometimes unaccountable ways.[76] Generative AI tools—which have recently crept into cooperative purchasing agreements[77]—impose a variety of other risks as well: hallucinated responses that can mislead human decisionmakers, environmental impacts, and more.[78] These AI systems need careful attention and specific oversight mechanisms to operate safely, but agencies cannot provide effective, individualized oversight through cooperative purchasing agreements. They need competitive bidding and specific, protective contract language.
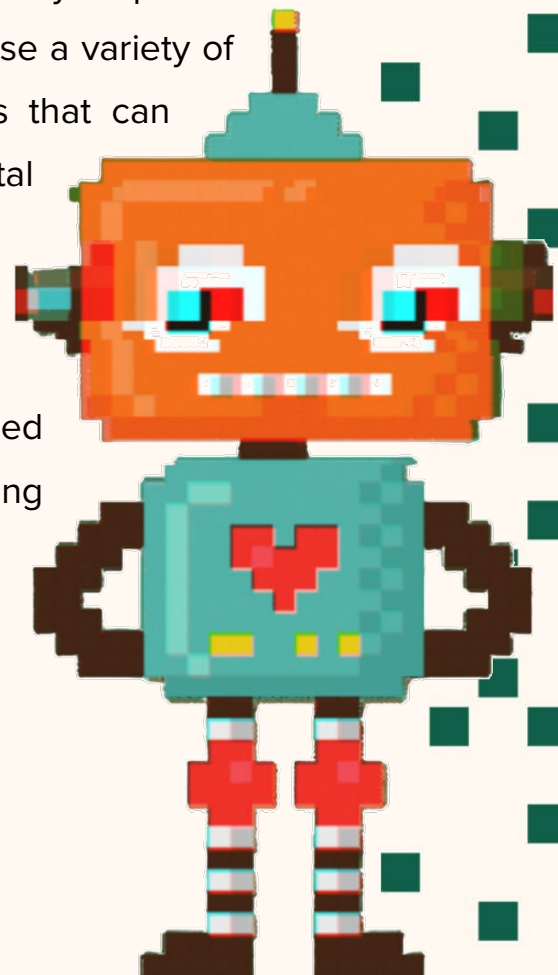
The A.I. Procurement Roadmap

The processes for responsible A.I. procurement are there, but the necessary guardrails aren't.

There's a Problem!
Resource restraints and political pressure push agencies toward procurement

Which Method?
Cooperative purchasing and exemptions let states skip competitive bidding cycles

Define the Problem
The agency articulates what problem or challenge they want an A.I. system to solve

Draft Request for Proposals
The agency publishes an RFP scoping the work that an A.I. system must do

Review Bids
Using criteria like total cost, the agency reviews each bid to find the best option.

Select the Vendor
After considering different options, the agency selects an A.I. vendor

Negotiate the Contract
Before deploying the A.I. system, the agency finalizes the vendor contract and remits payment

Monitor the Vendor
The agency monitors the vendor to ensure contract requirements are met—but it can be difficult for agencies to access the information they need to do this.

Renew or End the Contract
Many A.I. contracts allow agencies to renew their terms for several years, but agencies can always procure or build a different system—if they have the resources.

The Major AI Vendors

In recent years, state agencies have contracted with a wide variety of AI vendors for products and services ranging from simple case management software to sophisticated fraud detection, identity verification, and facial recognition systems. Despite the variety of AI systems available for government use, a handful of individual vendors dominate the AI procurement landscape across the country. From criminal risk assessments and generative AI tools to unemployment eligibility screening and fraud detection, the products and services of just ten vendors account for **over $715,000,00.00** in potential AI contract value across 42 states.

To identify these vendors, EPIC conducted open records requests across 27 states and researched contracting databases in all 50 states. The result: a sample of **621 AI contracts** around the country. These contracts do not encompass the entire world of AI procurement, but they offer a glimpse into how AI vendors have woven their systems into state government. Because several cooperative purchasing agreements did not include fixed total prices, EPIC estimated the maximum total price for each contract assuming each participating state purchased each vendor's full array of AI products and services.

Ten of these AI vendors dwarfed the rest in their scope and profitability. Here's what EPIC found:
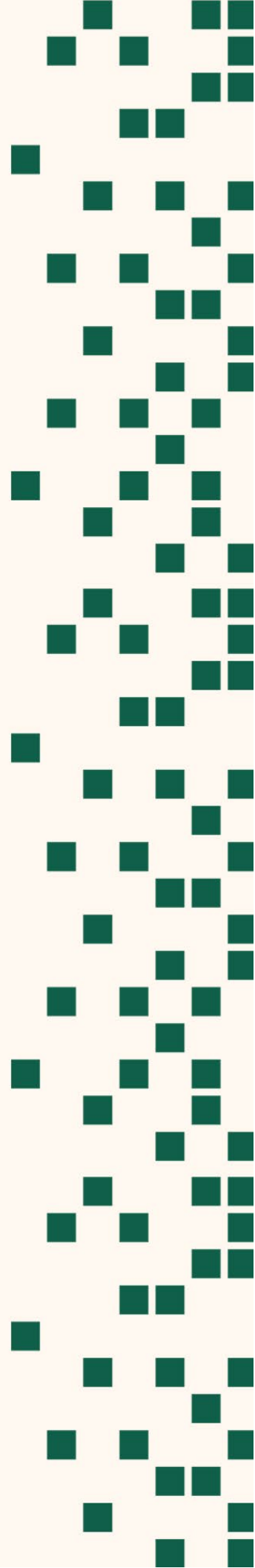
Top 10 AI Vendors
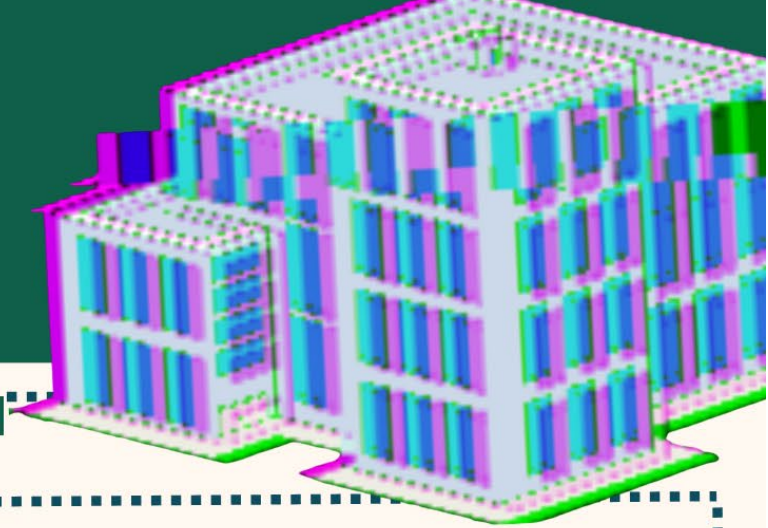
1 DELOITTE
$193,078,728
16 STATE CONTRACTS

The most prominent AI vendor from EPIC's research, Deloitte is the multinational accounting and consulting firm behind the **Unemployment Framework for Automated Claims & Tax Services (uFACTS).**[79] Providing both AI systems and call center support, Deloitte was one of the first—and largest—vendors to provide an AI system for managing Pandemic Unemployment Assistance (PUA), leading to lucrative contracts under COVID-19 procurement exemptions.

2 OPTUM
$149,711,635
2 STATE CONTRACTS

With contracts in at least two states—Montana and North Carolina—Optum provides a **Medicaid Management Information System (MMIS)** that includes automated fraud detection capabilities.[80] And despite being the second most profitable AI vendor EPIC identified, Optum's contracts were not the product of a competitive bidding process. Instead, states contracted with Optum through a cooperative purchasing process with NASPO ValuePoint, the contracting arm of the National Association of State Procurement Officials.[81]

3 ACCENTURE $121,341,615 1 STATE CONTRACT

The third most profitable AI vendor from EPIC's research is Accenture, a multinational IT services and consulting company.[82] Unlike other vendors on this list, Accenture made its fortune on a single maintenance contract: the firm operates and maintains Arizona's integrated and automated public benefits platform, **Health-e-Arizona Plus (HEAplus)**.[83]

4 AISERA
$99,627,360
40 STATE CONTRACTS

Providing **generative AI chatbots and agency assistants**,[84] Aisera is the only generative AI provider on EPIC's top ten list—although other vendors exist. And like many vendors, Aisera's services are available to 40 states through a cooperative purchasing process facilitated by NASPO ValuePoint.[85]

Top 10 AI Vendors
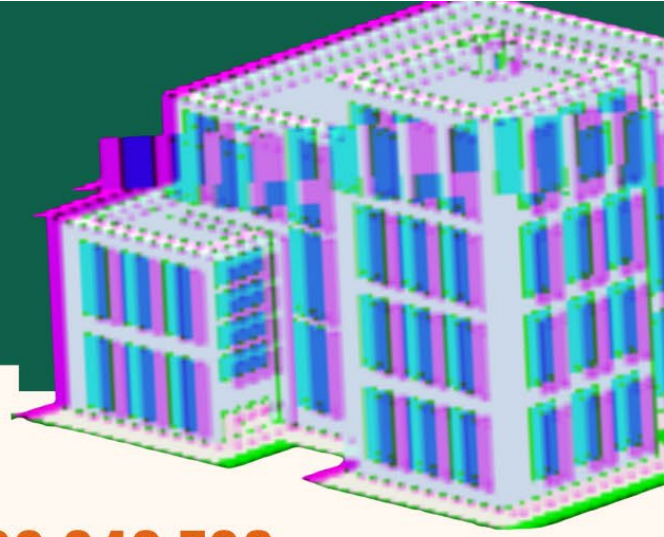
5

FAST ENTERPRISES $88,949,786   1 STATE CONTRACT

The fifth vendor on EPIC's list is Fast Enterprises, the government software consultancy behind Michigan's failed unemployment system, the **Michigan Integrated Data Automated System (MiDAS)**.[86] Fast Enterprises built the MiDAS system in 2013 and maintained it for years—during which time the system falsely flagged over 40,000 residents for fraud.[87] In 2022, Michigan replaced the MiDAS system with Deloitte's uFACTS system.[88]
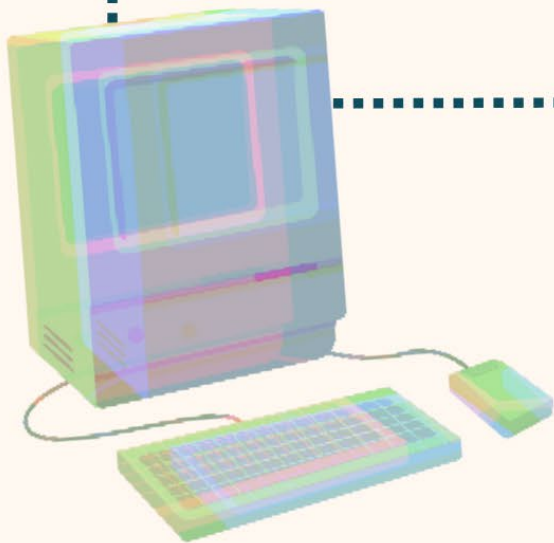
6

THOMSON REUTERS

$30,861,374   42 STATE CONTRACTS

This multi-industry conglomerate and major data broker is the sixth most profitable vendor from EPIC's research, primarily through the company's Fraud Detect system (formerly **Pondera Solution's FraudCaster system**),[89] which provides fraud predictions based on both public records and proprietary data collected from consumers.[90]

7 IBM

$23,016,745   41 STATE CONTRACTS

One of the oldest vendors on this list, IBM is the multinational technology company behind the **Cúram Social Program Management Platform**, an integrated health and social services platform that South Carolina began using in 2013 to oversee its Medicaid benefits applications and disbursements.[91] The Cúram platform, now spun out into an independent company, Merative,[92] includes automated data analytics and predictive intelligence functionalities.[93]

Top 10 AI Vendors

9 LEXISNEXIS

$2,310,534

42 STATE CONTRACTS

The second major data broker among EPIC's top ten most profitable AI vendors, LexisNexis provides a variety of proprietary AI systems to states across the country, including **AmplifyID**, **FraudPoint**, and **Accurint**.[94] LexisNexis is also behind several data offerings to government agencies, including proprietary consumer data provided to law enforcement.[95]

8 NORTHPOINTE

$5,784,009

1 STATE CONTRACT

Now rebranded as Equivant, Northpointe was the software consultancy behind the **Correctional Offender Management Profiling for Alternative Sanctions (COMPAS) system**, used to assign recidivism risk scores to criminal defendants.[96] Equivant is also the only vendor on EPIC's top ten list that focuses exclusively on systems designed courtrooms and criminal justice agencies.[97]

10 WEBAUTHOR $2,108,466 40 STATE CONTRACTS

The final vendor on EPIC's top-ten list is Webauthor, a company that provides several government AI services including the **Case Allocation Rotation System**, an automated system for assigning and managing child protective services investigations.[98]

The Anatomy of an AI Contract

What exactly goes into a government AI contract? While states vary in their procurement requirements and contract format, most state AI contracts are the culmination of at least four separate documents:

1. **Request for Proposals (RFP):** To initiate a procurement process, state procurement officials will publish an RFP laying out the expected terms of an A.I contract. These terms include the scope of work expected from a vendor; the term of the contract and whether the contract can be renewed; data rights and confidentiality expected while undertaking the contract; insurance requirements and legal responsibilities should anything go wrong; and a host of other standard contract terms.

2. **Offeror Bid:** Vendors then submit proposals—what are often called "bids"—outlining how their AI products and services could meet the agency needs outlined in the RFP. These bids frequently include information about the vendor, the vendor's proposed services, and the pricing of those services, but bids may also include additional terms or expectations for both the agency and vendor if the vendor is selected.

3. **Offer and Acceptance:** Once an agency picks a vendor's proposal, the agency and vendor negotiate the final terms

of the AI contract, drawing from the terms described in the RFP and Offeror Bid. The result is a final written offer— typically called an Offer and Acceptance— sent to the vendor, who will then sign and return the offer to make the contract official.

4. **Amendments:** After an agency enters into a contract with an AI vendor, the terms of the Offer and Acceptance are final and enforceable. However, most agency contracts allow for modifications or amendments to active contracts so long as all parties agree. Frequently, these amendments are used to renew AI contracts for additional years (and more money), but amendments can also include changes to an AI contract's terms, like changing how frequently a vendor conducts system maintenance or adding new AI services to an existing contract.

If these four documents serve as the bones of a state AI contract, the specific terms of the contract serve as the meat. So what terms do AI contracts include? There are several terms common to most government contracts that do not directly impact AI oversight: agreed-upon definitions, payment schedules, warranties, insurance requirements, terms concerning whether and when a vendor can outsource work to subcontractors, and so forth. But three contract terms are worth highlighting in more detail. Let's break them down using real examples.

Example 1: Aisera Data Ownership Provision (NASPO)

"The Contractor shall not access Purchasing Entity user accounts or Purchasing Entity data, except (1) in the course of data center operations, (2) in response to service or technical issues, (3) as required by the express terms of this Master Agreement, Participating Addendum, SLA, and/or other contract documents, or (4) at the Purchasing Entity's written request."

The above provision comes from the NASPO ValuePoint Master Agreement governing a portfolio of vendors including Aisera.[99] The provision appears strong, restricting when and how a vendor can access and use data provided by the purchasing agency. However, AI systems can do more than just use data; they can *produce* data through predictions and inferences.[100] To protect the public's data from harmful inferences and restrict how vendors use inferences, the data ownership provisions within AI contracts need specific language restricting ownership over data inferences to the purchasing agencies.

Illinois' contract with Thomson Reuters provides one example of a more expansive data ownership provision—one that appears to cover data inferences:

"All work performed or supplies created by Vendor under this contract, whether written documents or data, goods or deliverables of any kind, shall be deemed work for hire under copyright law and all intellectual property and other laws, and the State of Illinois is granted sole and exclusive ownership to all such work, unless otherwise agreed in writing."

Example 2: RentGrow Service Fee Schedule (D.C.)

"SERVICE FEES:

$5.00 – Premium Credit Screening and Social Security Fraud Check;

$18.00 – Premium National Criminal Screening including national criminal search, national sex offender search, OFAC/SDN Terrorist search, DC County and Virginia State Supplemental County/State criminal searches;

$3.00 – Civil Court Records pertaining to landlord and tenant disputes;

$1.00 – Rental Payment History Screening, including records from the Experian RentBureau National Rental Data Exchange and Collections Data from Multi-Family Collection Agencies."

The above provision comes from a D.C. Housing Authority contract with RentGrow, a company offering automated tenant screening services.[101] While the per-service fees are far cheaper than the total contract prices seen from other vendors, RentGrow's service fee structure still raises two issues: transparency and control. Because the contract includes a per-search fee schedule instead of a total price, the actual amount of money flowing from D.C. government to RentGrow continually changes without the public having easy access to the amount of money being spent. Additionally, because RentGrow organizes its tenant screening system as a service it provides instead of a product it furnishes to the purchasing agency, D.C. government never has direct access to the automated processes used to produce RentGrow's tenant screening reports. If RentGrow's tenant screening algorithm produced faulty or biased reports, the purchasing agency would have no easy way to investigate and fix the issue.[102]

To keep government AI contracts transparent and accountable, state procurement officers should, at minimum, include a maximum possible contract price within AI contracts. Iowa's contract for Thomson Reuters' fraud detection system provides one example:

> *"All fees and compensation payable hereunder to Vendor are fixed, not-to-exceed amounts, and Vendor shall not be compensated on a time and...*

> *...materials basis. It is expressly understood and agreed that in no event will the total fees or compensation to be paid under the initial Statement of Work exceed the sum of $45,000."*[103]

Contracts can also increase the accountability of government AI systems by shifting from service-based models to product-based models. When vendors build AI systems for agency officials to use instead of providing AI services, agency officials can gain the training and expertise they need to audit AI systems and respond to changing policy goals. Arizona's contract with Accenture for the Health-e-Arizona Plus (HEAplus) benefits system offers one example of how this might look:

> *"The offeror shall propose its solution with the assumption that the system will be fully migrated to the State's cloud vendor, Azure, and shall be hosted and maintained in this environment for the term of this contract....*
>
> *"The Contractor is [also] responsible for ensuring the HEAplus Training Environment has been adequately updated in advance of State-hosted training sessions, including software updates and adequate emulation of various components of the system to provide high-quality training. The Contract must also support the State in maintaining training scenarios."*[104]

Rather than rely on a vendor-provided service, Arizona developed its own benefits system and contracts with vendors to update the system and train Arizona officials on how to use it.

Example 3: MiDAS Security Audit Provision (Michigan)

"[T]he State has the right to review Contractor's data privacy and information security program prior to the commencement of Services and from time to time during the term of this Contract. The State, at its own expense, is entitled to perform, or to have performed, an on-site audit of Contractor's data privacy and information security program."[105]

This provision, included alongside a variety of financial and data security audit provisions, comes from Michigan's original contract with Fast Enterprises, the vendor behind Michigan's infamously faulty MiDAS unemployment benefits system. While the language appears strong, data privacy audits may not adequately protect against the full range of faulty or biased AI outputs. In Michigan's case, for example, the provision failed to catch over 40,000 false fraud determinations.[106]

To identify and prevent these types of AI harms, agencies need to include specific AI testing or auditing provisions targeting common sources of AI errors: biased or unrepresentative training data, unreliability across different use contexts, and loss of model

accuracy over time, among others. Michigan's contract with Deloitte to replace the MiDAS system offers one path toward better AI audit provisions:

> *"Contractor will deposit with [an] escrow agent... the Source Code for the Software, as well as the Documentation and names and contact information for each author or other creator of the Software.... At State's request and expense, the escrow agent may at any time verify the [Source Code,] ... compar[e] it to the Software, and review[] the completeness and accuracy of any and all material."*[107]

State agencies can and should expect vendors to provide source code and procedural documentation about their AI systems—either directly to an agency or an independent auditor—which can then test and evaluate the material for accuracy and reliability.[108]

Part Three

Recommendations & Reforms
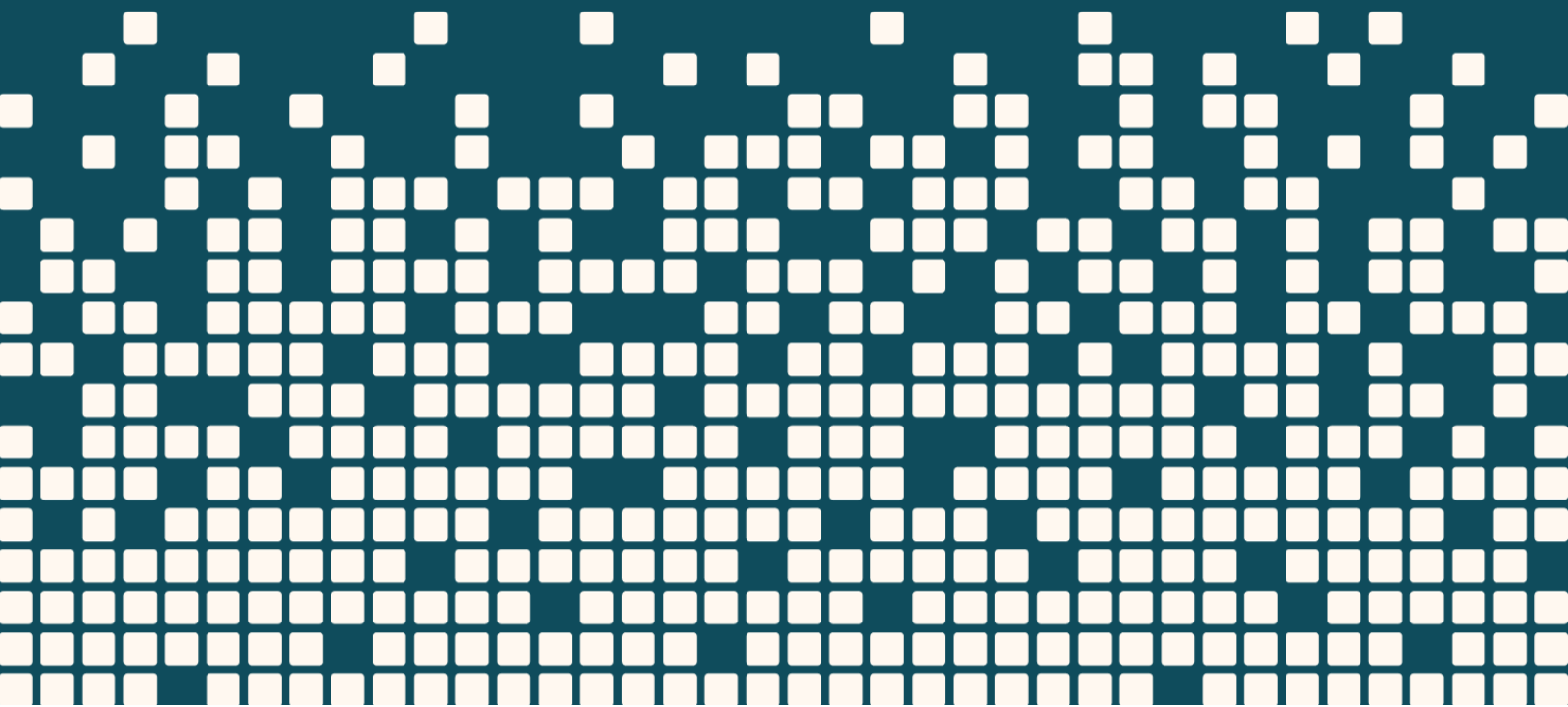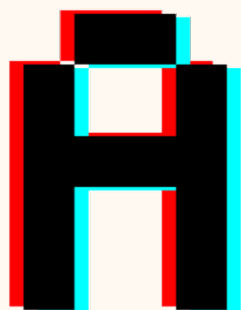
I vendors have placed harmful AI systems within government agencies across the country, but agencies and state legislatures still have options to protect the public from AI harms and regain control over government decisions. Part Three provides four such options:

1. Establishing processes for **auditing AI systems**—and restricting the most harmful uses;

2. **Imposing protective language in AI contracts by law** to empower agencies during contract negotiations and while monitoring AI systems;

3. **Increasing transparency and support for public recourse** following AI harms, including certain contractual rights for those receiving government support;

4. **Pursuing non-AI options** when agencies cannot mitigate AI harms.

Reining in harmful AI systems will require far more than these four recommendations, but AI oversight and procurement reform will go a long way to mitigate AI harms. Outsourcing government decisions to AI systems is political, and we can demand more from our government.
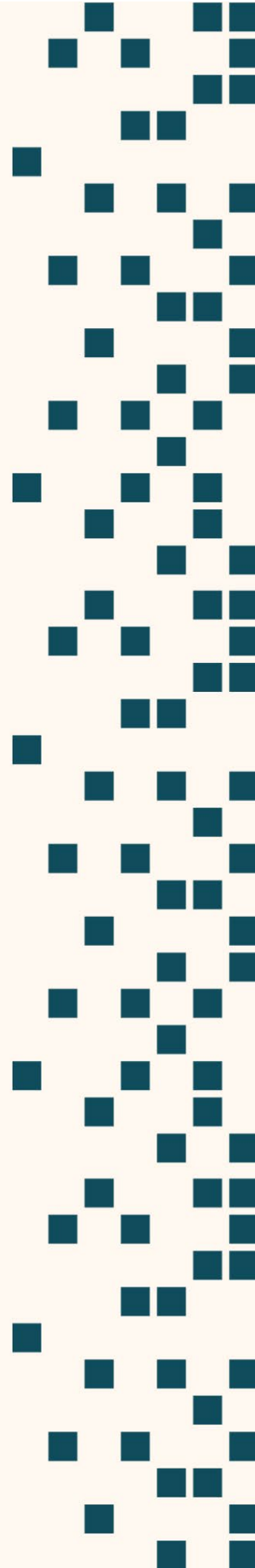
Recommendation 1: AI Audits & Restrictions

Robust, transparent, and independent audits of AI systems and their outputs are the gold standard for safely using any sort of automated system that impacts individuals. For example, the White House recommends audits as part of its Blueprint for an AI Bill of Rights,[109] and the National Institute of Standards and Technology (NIST) includes audits, testing, and evaluation as core features of its AI Risk Management Framework.[110] But what exactly are AI audits?

One of the core challenges of using AI systems is ensuring that their outputs are fair and accurate. AI audits can help with that. While advocates and technologists disagree on what the optimal AI audit includes, audits may include:

1. An **independent review of the data used to train and operate an AI system**;

2. A **stress test of the AI system under different situations**, like situations in which humans tend to show racial or gender bias; and

3. Regular testing to ensure the fairness and accuracy of an AI system remains consistent over time.[111]

AI audits should cover both effectiveness and accuracy to achieve a specified goal, should use localized data appropriate for its stated purposes, and should analyze civil rights impacts. For audits to be meaningful, however, policymakers need to place them within an infrastructure that can act on audit results to inform decisions about whether to use a system. Agencies should provide public access to audit reports and other AI documentation as well. Without meaningful oversight of AI audits, agencies risk having their audit processes coopted by industry interests or ignored entirely.

At their core, AI audits are procedures for determining when an AI system is too risky to use. For some AI applications, the risks are so high that prohibitions on AI use are the only path forward. EPIC has long advocated for restrictions on the most harmful uses, including emotion recognition systems and one-to-many biometric surveillance systems,[112] and the same restrictions hold true for AI systems procured by state agencies. For many other AI applications, the risks of harm to the public depend on *how* and *when* AI systems are used. Managing and mitigating these risks are at the core of responsible AI use: agencies need enough information to identify AI risks and determine when they should stop or prevent AI uses. AI audits are one straightforward way to require this information when contracting.
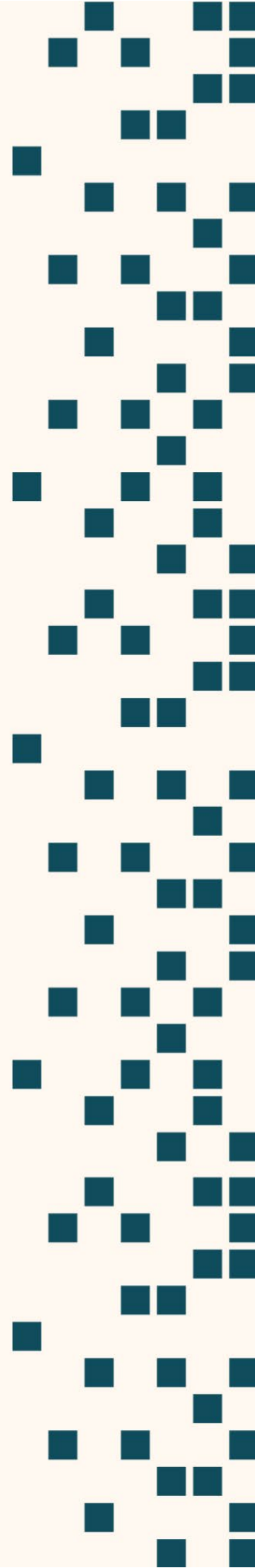
AI audits could come into play at two stages of the procurement process. First, state procurement officials could require vendors to disclose a detailed description of an AI system's capabilities, intended uses, and limitations when they bid on an RFP. Procurement officials could then compare AI systems' capabilities with their agencies' intended uses to determine whether the AI system is appropriate—or even whether an AI system is necessary. Second, state agencies could include contractual provisions requiring ongoing AI testing and evaluation during the course of the contract. NIST's AI Risk Management Framework provides several potential testing and evaluation requirements that agencies could impose, including tests for changes in AI outputs over time and "red-team exercises" where auditors would actively stress test an AI system looking for errors or biases.[113]

EXPLAINER

Federal Funding & State AI Procurement

Federal agencies like the Department of Justice and the Department of Labor offer grants to state and local subdivisions like police departments, schools, and public benefits agencies. Some of these grants are ongoing programs with goals like modernization or improved service delivery, but money also flows from federal agencies to state and local entities in a less structured manner. For example, the American Rescue Plan Act provided COVID-19 recovery funds to jurisdictions around the country, but that funding was used to purchase automated gunshot detection and fraud prevention systems. Federal funding can influence states' funding priorities—including AI procurement.

Recommendation 2: Stronger Contract Language

There is only so much an agency can do to monitor the AI systems they procure under existing contracts. From provisions that grant AI vendors exclusive rights to maintain and operate an AI system[114] to data privacy provisions that fail to restrict how vendors use AI outputs created using government data,[115] many AI contracts benefits vendors far more than agencies. These contracts reflect the relative power and knowledge of the contracting parties: because state agencies lack the expertise and resources to check or overwrite provisions that favor vendors, they often agree to contractual language that restricts or undermines their authority.

Whether by legislation or agency rulemaking, requiring contract provisions that protect individuals and their data will go far to prevent harms from government AI systems before they occur. While states may differ in the provisions they implement or language they demand from vendor contracts, EPIC has identified four contractual provisions that agencies and legislatures should focus on:

1. **Improving Data Oversight and Control:** State AI contracts often fail to consider what secondary uses a vendor may have for data, meaning that vendors could use the data you provide to the government (or inferences derived from that data) for other purposes after the contract requirements were met.[116] Stronger data oversight provisions in state AI contracts can ensure that AI vendors do not misuse or profit off your data in commercial markets. However, the opposite is also true: state agencies should not attempt to use AI contracts to access vendor data beyond what government agencies are entitled to collect directly.

2. **Imposing Transparency or Reporting Requirements:** EPIC identified several instances in which state agencies outsourced the entire operation of AI systems to vendors. These contracts—often described as "software as a service" contracts—make it difficult for agency officials to understand how AI systems work or why they produce certain outputs.[117] Without direct access to and oversight of the processes used to produce AI predictions and recommendations, agencies cannot ensure that the AI systems they use are fair and accurate.
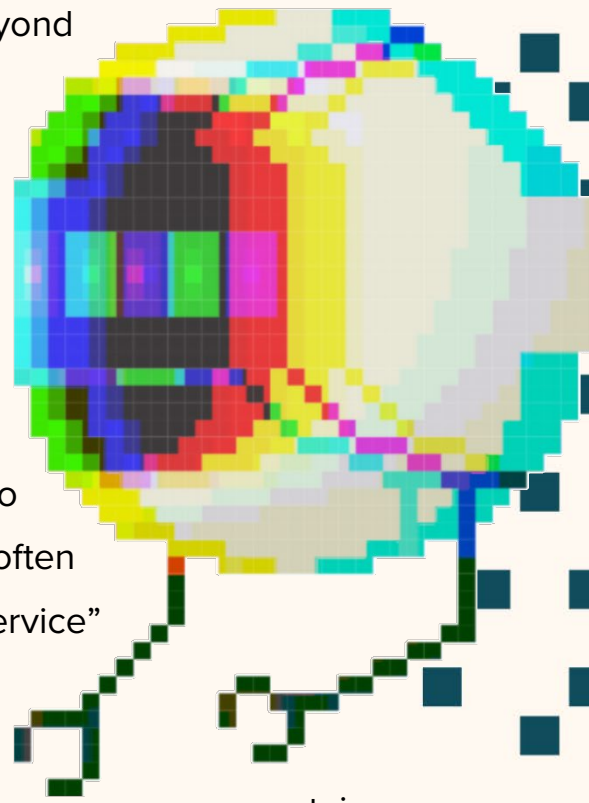
3. **Incorporating Sunsetting Clauses or Procedures to Transition Ownership to Agencies:** A large part of keeping government AI decisions accountable is making sure that agencies can control how and when AI systems are used, yet many AI contracts today give vendors complete and exclusive control over government AI systems. These contracts, which can last for several years, restrict agencies' ability to change how they use AI systems and which vendors they use—unless they spend a large amount of money to initiate another procurement process.[118]

4. **Requiring Human Review:** Some AI contracts rely on AI systems to make important decisions about individuals' eligibility for government benefits without requiring agency employees to review or oversee those systems.[119] Human review by trained agency employees can be an effective way to mitigate the risks of faulty AI systems before harm occurs.

Crucially, contract provisions are only as effective as the agencies enforcing them. When an AI vendor violates protective provisions within a government contract, agencies—or independent bodies like state attorneys general offices—need to enforce AI contracts on behalf of harmed individuals. Contractual, legislative, or regulatory incentives to strictly enforce AI contract provisions can help ensure that stronger contract language is effective at mitigating AI risks.
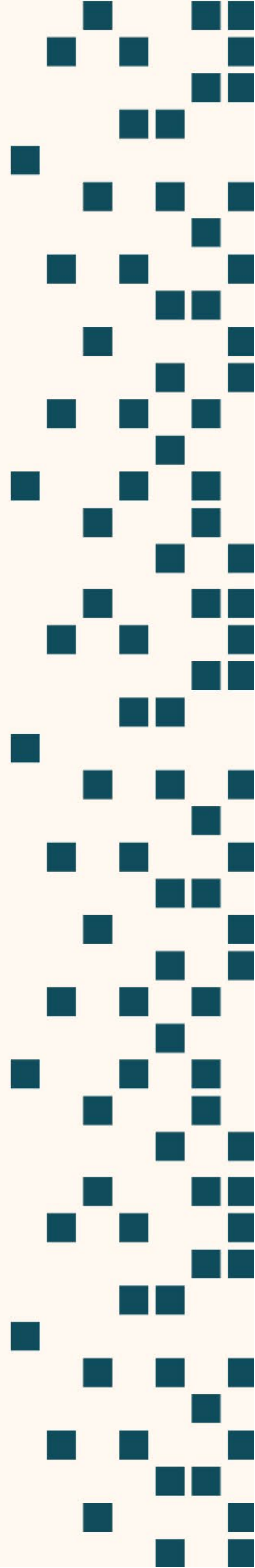
Recommendation 3: Empowering Those Harmed

Beneficiaries of government services are facing AI harms across the country, and legal aid organizations like those within the Benefits Tech Advocacy Hub's network have made strides to remedy those harms. For example, in one ongoing case, *K.W. v. Armstrong*, attorneys from the ACLU of Idaho convinced a federal district court that disseminating information about how an assessment tool operated was required under the Due Process Clause of the Fourteenth Amendment.[120] And in the 2015 case, *Unan v. Lyon*, legal advocates convinced a federal district court judge to strike down Michigan's system for automatically comparing Supplemental Nutrition Assistance Program (SNAP) beneficiaries to a database of outstanding felony warrants to make determinations about who said retain or receive SNAP benefits—a system that led to over 19,000 automatic benefits terminations.[121]

Despites herculean efforts by legal aid organizations and community groups to challenge harmful AI systems, several features of government AI systems make it difficult for private

individuals to identify how they were harmed—let alone litigate their injury in court. For example, many individuals are not notified when they are subject to AI decision-making or provided with a reason for adverse agency action, making it difficult to challenge an agency's decision. Even if an individual wants to challenge agency action, the agency may not know why a vendor-controlled AI system acted the way it did—and vendors may shield information about their AI systems from the public under trade secrets laws.

Legal aid organizations and other third-party advocates are valuable, independent overseers of government AI systems, and state governments can take several steps to empower legal advocates to monitor and mitigate AI risks. First, agencies can **ensure that individuals have access to robust notices and opportunities to appeal or opt out of AI decisions**. Legal aid organizations can use existing legal remedies to unfair or illegal agency decision-making, but they need to know how decisions were made to pursue them. Requiring vendors to provide this information—and sharing that information with the public—can empower individuals to rapidly identify flawed or harmful AI decisions. Second, policymakers could empower legal aid organizations even further by legislating a "**private right of action**," which would give individuals harmed by government AI systems a statutory basis for litigating their injury.[122] Third, state agencies could establish a **centralized, searchable database of AI documentation, processes, and audit results**. Making
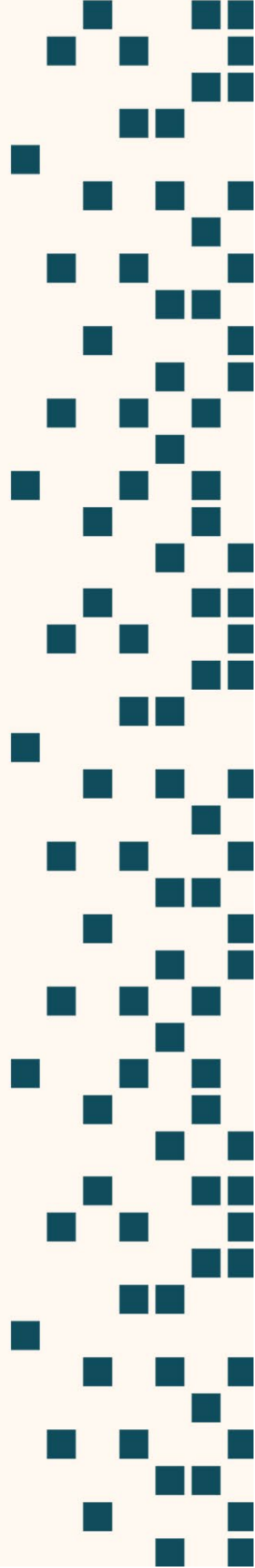
information about AI systems easily accessible not only to agency officials but also the public can empower civil society organizations and legal aid organizations alike to conduct their own audits and suggest improvements to agency processes.

Lastly, for particularly important decision-making functions, agency procurement officers may want to explore contractual provisions granting "**third-party beneficiary rights**": contractual rights that the subjects of AI decisions can exercise if they are harmed. These rights are different from a statutory private right of action because they do not require legislation. Individuals harmed by a government AI system could immediately pursue a contractual remedy in court or directly with the agency or vendor.

Above all, state agencies should view legal aid organizations as collaborators that can support government AI risk management programs. Collaborating with legal advocates and communities impacted by AI decisions may not only improve oversight of AI systems, but also minimize the risk of costly legal battles when AI harm occurs.
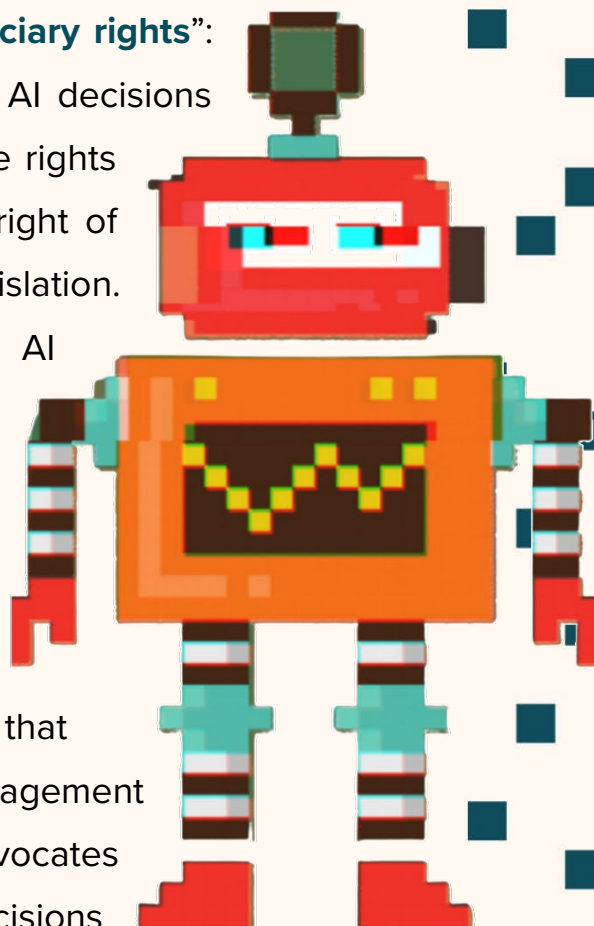
Elder v. Gillespie

In Arkansas, many residents with disabilities depend on home-care support and services provided by the state's Medicaid program, ARChoices, to maintain their independence. In 2019, however, three disabled residents—Ginger Elder, Jacquelyn Dearmore, and Benjamin Taylor—found their Medicaid benefits reduced or eliminated overnight. Unbeknownst to them, the Arkansas Department of Human Services (ADHS) had procured an automated eligibility tool, the Arkansas Independent Assessment (ARIA), earlier that year to manage the ARChoices program. And despite experiencing no medical improvement, each of the would-be plaintiffs found their eligibility reduced or terminated entirely because of the AI system.

With the help of Legal Aid of Arkansas, the three plaintiffs sued officials within the ADHS for reducing or eliminating their Medicaid benefits because of ARIA. However, they did not directly argue that the ARIA determinations were incorrect, in part because information about the AI system was difficult to obtain. Instead, they argued that reducing or eliminating their benefits without providing adequate written notice and an administrative hearing violated their due process rights under state and federal law. And they succeeded: after winning in court, the plaintiffs received a $500,000 settlement from Arkansas.

Recommendation 4: Reprioritize Non-AI Options

AI systems may not always yield improvements to benefit delivery or agency efficiency; in truth, many faulty AI systems have cost state agencies millions more in litigation costs than agencies saved by outsourcing and automating their processes.[123] When a government agency cannot effectively mitigate the risks of an AI system—for example, when the agency cannot invest in sufficient oversight—the agency should fall back on human decision-making.

How can an agency tell when an AI system is too risky to use? In some cases, the AI use case may be too risky to implement *regardless* of what risk mitigation or oversight practices an agency employs. For example, because there is no evidence to support the reliability of "emotion detection" AI systems,[124] government agencies could not use them while ensuring they are fair, reliable, and accurate. For most AI use cases, however, determining whether an AI system is too risky is a matter of deciding an agency's oversight budget and willingness to tolerate

risks to both the agency and the public.[125] As the NIST AI Risk Management Framework describes:

> "[R]isks which the organization determines to be the highest for the AI systems within a given context of use call for the most urgent prioritization and most thorough risk management process. In cases where an AI system presents unacceptable negative risk levels—such as where significant negative impacts are imminent, severe harms are actually occurring, or catastrophic risks are present—development and deployment should cease in a safe manner until risks can be sufficiently managed."[126]

Using AI systems responsibility requires time, money, and effort, but that investment is necessary for state agencies to use AI systems without causing harm.
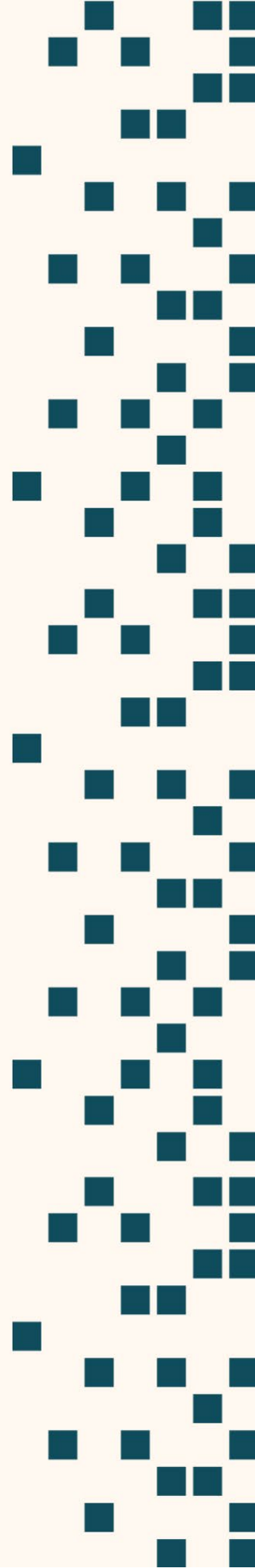
Appendix A
Our Methods

In 2021, a team of EPIC lawyers began researching AI systems used by the government of the District of Columbia. Our initial goal was simple: we wanted to know which D.C. agencies were using AI. The results of our initial research, published in November 2022 as EPIC's *Screened & Scored in the District of Columbia* report, revealed an unnerving trend: AI systems were far more common—and used to make far more important government decisions—than we expected.

EPIC's work in Washington, D.C., sparked an interest among EPIC's lawyers in the AI systems used by state and local governments across the country, as well as the vendors developing and selling these systems. Building on EPIC's previous work researching and requesting documents about government AI systems, this report sheds light on the oft-forgotten world of government AI procurement. It aims to highlight not only the variety of AI systems woven throughout state and local government, but also the major conglomerates behind many of the most common forms of government AI.

We decided to submit targeted records requests to state and local government agencies with reported AI usage, particularly in the areas of criminal justice, employment, health, housing, and welfare. To create a list of target agencies, we conducted open-source research into news reporting on state AI, filings in AI-related litigation, and public contracting databases. To learn how AI systems were used after procurement, we requested not only full contract documents, but also supporting materials that describe how each AI operates and what data they use, including validation studies, data sharing agreements, privacy impact assessments, memoranda, and internal policy documents. For most records requests, we named specific AI systems or vendors with whom the agency had contracted. However, we also included some broad requests for information concerning other AI systems that we may not have uncovered through open-source research.

In total, EPIC submitted records requests to local and state agencies in 27 states and the District of Columbia, including the:

- Allegheny County Crime Lab
- Arizona Department of Economic Security (AZ DES)
- California Department of Justice (CalDOJ)
- Colorado Department of Labor and Employment (CDLE)
- Cuyahoga County Prosecutor's Office*
- D.C. Child and Family Services Agency (D.C. CFSA)*
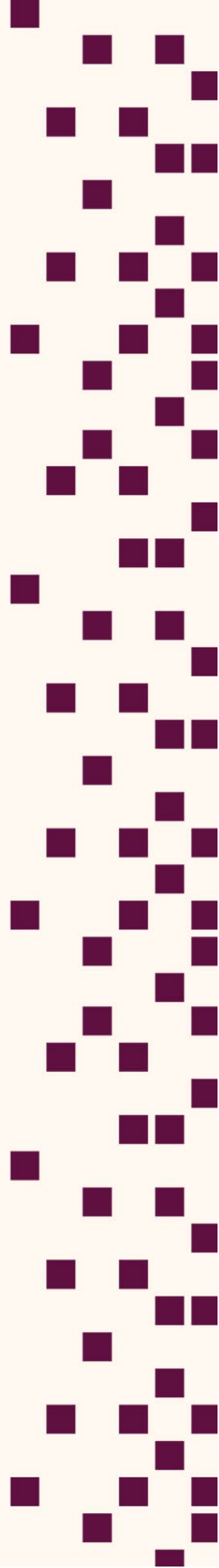
- D.C. Department of Employment Services (D.C. DOES)*

- D.C. Department of Health Care Finance (DCHCF)

- D.C. Department of Health Services (D.C. DHS)

- D.C. Department of Transportation (DDOT)*

- D.C. Department of Youth Rehabilitation Services (D.C. DYRS)

- D.C. Housing Authority (DCHA)

- D.C. Office of Contracting Procurement (D.C. OCP)

- D.C. Pretrial Services Agency (D.C. PSA)

- D.C. Public Schools (DCPS)*

- East Baton Rouge District Attorney's Office*

- Georgia Department of Community Supervision (GA DCS)

- Georgia Department of Community Health (GA DCH)

- Georgia Department of Human Services (GA DHS)*

- Georgia Department of Labor (GA DOL)*

- Hawaii Department of Human Services (HI DHS)*

- Idaho Department of Corrections (IDOC)

- Illinois Department of Employment Security (IL IDES)

- Indiana Department of Workforce Development (IN DWD)*

- Indiana Family and Social Services Administration (IN FSSA)*

- Iowa Department of Public Health (IA DPH)

- Iowa Workforce Development Department (IWD)*

- Kansas Department of Labor (KS DOL)

- Los Angeles County District Attorney's Office*

- Louisiana Workforce Commission (LWC)*

- Maine Department of Public Safety (ME DPS)*

- Massachusetts Department of Unemployment Assistance*

- Michigan Unemployment Insurance Agency (MI UIA)*

- Mississippi Department of Corrections (MDOC)

- Missouri Sentencing Advisory Commission (MOSAC)

- Montana Department of Corrections (MT DOC)*

- Nebraska Department of Correctional Services (NDCS)

- Nevada Department of Health and Human Services (NV DHHS)

- New Mexico Human Services Department (NM HSD)

- New York City Department of Social Services (NYC DSS)

- New York Office of Temporary & Disability Assistance (NY OTDA)

- New York State Police*

- New Hampshire Department of Corrections (NH DOC)*

- Texas Department of Criminal Justice (TDCJ)

- Virginia Criminal Sentencing Commission (VCSC)*

- Virginia Department of Forensic Science (VA DFS)

- Wisconsin Department of Corrections (WI DOC)

* *Agency did not provide responsive documents*

While open records requests are a good way to learn more about government contracts and government AI use, they take time— and often, we faced agency delays, ignored requests, and other hurdles that limited how many responsive documents we could collect. To bolster the scope of our research and to encompass all fifty states, we supplemented our open records research with three forms of secondary research:
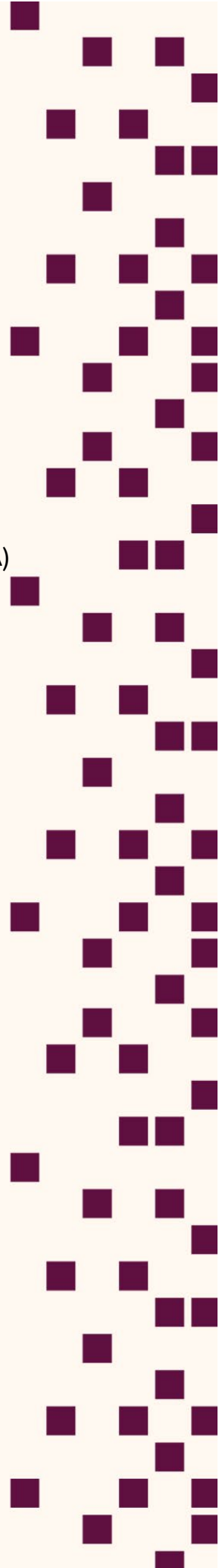
1. research into state contracting databases,

2. interviews with agency employees, and

3. correspondence with legal aid organizations working on issues related to government AI use.

In total, EPIC found 621 state contracts for AI or automated decision-making systems, many of which came from cooperative purchasing processes. While many state contracts included a fixed total price, some contracts—including cooperative purchasing agreements—only provided a per-service or per-hour fee structure. To estimate the total value of these contracts, EPIC calculated the total potential reach of the contracts if each agency purchased the vendor's full product offering. Without greater transparency into the procurement process, EPIC could not provide more accurate estimates. Any vendors that would like to clarify the amount of money they received from government entities may contact EPIC directly to update our estimates.

For a comprehensive list of all the contracts we uncovered while researching this report, see Appendix B. We will also periodically update an online version of our contract research table at https://airtable.com/appehlQjJhJON74mt/shrIZHs8Ipq7oP5Ep.
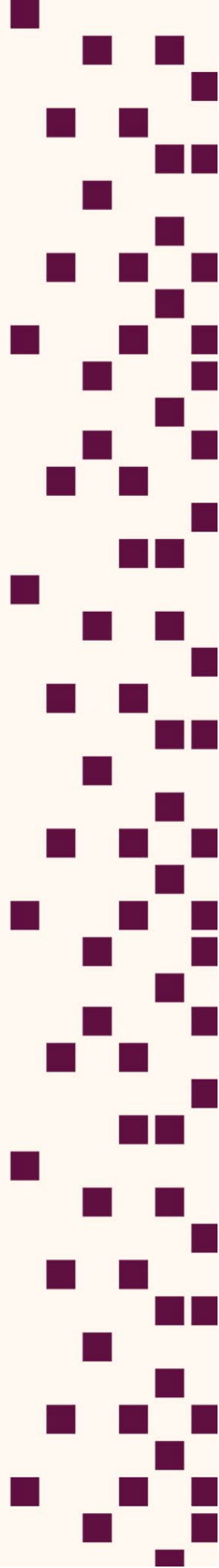
Appendix B

AI Contract Table

At the time of publication, EPIC identified 621 state contracts with vendors providing AI tools or automated decision-making systems, although other AI contracts are no doubt in existence. Together, these contracts encompass a potential market reach of **$720,009,232.96** in public funds across all fifty states.[127]

A table summarizing the contracts EPIC has identified is provided below.

For periodic updates to this table, visit https://airtable.com/appehlQjJhJON74mt/shrIZHs8Ipq7oP5Ep.

ALABAMA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	AL Division of Procurement	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
Aisera	AI Service Desk & Conversational AI Platform	Generative AI chatbots and AI assistants	AL Division of Procurement	Cooperative purchasing agreement	$2,372,080.00
LexisNexis	AmplifyID	AI identify verification and fraud prevention	AL Division of Procurement	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	AL Division of Procurement	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	AL Division of Procurement	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	AL Division of Procurement	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	AL Division of Procurement	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	AL Division of Procurement	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	AL Division of Procurement	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	AL Division of Procurement	Cooperative purchasing agreement	$51,426

ALASKA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	AK Department of Administration, Office of Information Technology	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
Aisera	AI Service Desk & Conversational AI Platform	Generative AI chatbots and AI assistants	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,372,080.00
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
		assignment and management system			
TCC Software Solutions	Ascend & eXpedite	Automated data analytics and program management systems	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
TCC Software Solutions	EAPConnect	Automated LIHEAP data management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

ARIZONA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	AZ Procurement Office (for all state entities)	Cooperative purchasing agreement	$623,348.90
Accenture	HEAplus (Maintenance)	Bespoke, web-based benefits eligibility system covering all elements of benefits administration	AZ Health Care Cost Containment System	Competitive bid process	$121,341,615.00
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
Aisera	AI Service Desk & Conversational AI Platform	Generative AI chatbots and AI assistants	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,372,080.00

LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Accenture	Health-e-Arizona Plus (Maintenance)	Maintenance for automated benefits application portal	AZ Health Care Cost Containment System	Competitive bid process	$121,341,615.00
Geographic Solutions	Geographic Solutions Unemployment System	Automated pandemic unemployment assistance claims system	AZ Department of Economic Security	Competitive bid process	$995,250.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

| SHI International | WhoIAm | Automated identity verification and fraud prevention system | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | Unclear (only hourly rates listed) |
| SHI International | Rezolve.ai | Generative AI service desk | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | Unclear (only hourly rates listed) |

ARKANSAS

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	AR Department of Finance and Administration (for all state entities)	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

CALIFORNIA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
Aisera	AI Service Desk & Conversational AI Platform	Generative AI chatbots and AI assistants	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,372,080.00
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
TCC Software Solutions	Ascend & eXpedite	Automated data analytics and program management systems	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
TCC Software Solutions	EAPConnect	Automated LIHEAP data management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00

COLORADO

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	CO Purchasing & Contracts Office (for all state entities)	Cooperative purchasing agreement	$623,348.90

ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

CONNECTICUT

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	CT Department of Administrative Services	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
TCC Software Solutions	Ascend & eXpedite	Automated data analytics and program management systems	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
TCC Software Solutions	EAPConnect	Automated LIHEAP data management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

DELAWARE

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

DISTRICT OF COLUMBIA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
RentGrow	RentGrow Tenant Screening	Automated tenant screening reports using commercial data	DC Housing Authority	Competitive bid process	Unclear ($27.00 total charges per report)
Thomson Reuters	Pondera's FraudCaster and CaseTracker	AI fraud detection and case management systems	DC Department of Human Services	Competitive bid process	$929,987.00

FLORIDA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	FL Department of Management Services	Cooperative purchasing agreement	$623,348.90

ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
TCC Software Solutions	Ascend & eXpedite	Automated data analytics and program management systems	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
TCC Software Solutions	EAPConnect	Automated LIHEAP data management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00

SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

GEORGIA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	GA Department of Administrative Services	Cooperative purchasing agreement	$623,348.90
Applied Research Services	ARS Unified Risk Assessment	Automated criminal risk assessment	GA Department of Community Supervision	Single-source procurement	$215,000.00
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
		intelligence services, among other things			
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
Applied Research Services	ARS Unified Risk Assessment	Automated criminal risk assessment tool	GA Department of Community Supervision	Competitive bid process	$215,000.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk		Cooperative purchasing agreement	Unclear (only hourly rates listed)

GUAM

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00

HAWAII

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	HI State Procurement Office (for all state entities)	Cooperative purchasing agreement	$623,348.90

ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

IDAHO

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	ID Department of Administration	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00

Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

ILLINOIS

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Thomson Reuters	Pondera's FraudCaster	Automated benefits fraud prediction system using risk scores	IL Department of Employment Security	Non-competitive process (COVID-19 exemption)	$854,329.00
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	IL Chief Procurement Office, Unified Procurement Program	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83

LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
TCC Software Solutions	Ascend & eXpedite	Automated data analytics and program management systems	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
TCC Software Solutions	EAPConnect	Automated LIHEAP data management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
Deloitte Consulting	uFACTS	Automated unemployment claims management services	IL Department of Employment Security	Competitive bid process	$33,834,194.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

INDIANA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Thomson Reuters	Pondera's FraudCaster	AI fraud detection system	IN Department of Workforce Development	Competitive bid process	$2,067,478.35
Thomson Reuters (West Publishing)	Pondera's FraudCaster	AI fraud detection system	IN Family and Social Services Administration	Competitive bid process	$787,000.00

IOWA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Thomson Reuters	Pondera's FraudCaster	Automated benefits fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Competitive bid process	$89,780.00
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00

Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Thomson Reuters	Pondera's FraudCaster, Pondera Dashboard, and LexisNexis Accurint System	AI fraud detection, people search, and public records system	IA Department of Public Health	Competitive bid process	$89,780.00

KANSAS

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	KS Department of Administration, Office of Procurement and Contracts	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
		intelligence services, among other things			
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

KENTUCKY

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	KY Commonwealth Office of Technology	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
		intelligence services, among other things			
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

LOUISIANA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	LA Office of State Procurement	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54

		intelligence services, among other things			
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
TCC Software Solutions	Ascend & eXpedite	Automated data analytics and program management systems	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
TCC Software Solutions	EAPConnect	Automated LIHEAP data management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

MAINE

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

MARYLAND

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	MD Department of General Services, Office of State Procurement	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

MASSACHUSETTS

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00

Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65

MICHIGAN

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Deloitte Consulting	uFACTS	Automated unemployment benefits system	MI Department of Technology, Management, and Budget	Competitive bid process	$59,579,910.00
Fast Enterprises	MiDAS	Automated unemployment benefits system	MI Department of Technology, Management, and Budget	Competitive bid process	$88,949,785.72

MINNESOTA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

MISSISSIPPI

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	MS Department of Information Technology Services	Cooperative purchasing agreement	$623,348.90
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

| SHI International | WhoIAm | Automated identity verification and fraud prevention system | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | Unclear (only hourly rates listed) |
| SHI International | Rezolve.ai | Generative AI service desk | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | Unclear (only hourly rates listed) |

MISSOURI

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	MO Office of Administration, Division of Purchasing	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)

Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
TCC Software Solutions	Ascend & eXpedite	Automated data analytics and program management systems	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
TCC Software Solutions	EAPConnect	Automated LIHEAP data management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

MONTANA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	MT State Financial Services Division	Cooperative purchasing agreement	$623,348.90

ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
Optum	Optum Medicaid Management Information System (MMIS)	Automated Medicaid management system	MO Department of Public Health and Human Services	Cooperative purchasing agreement	$40,171,698.05

NEBRASKA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	NE Department of Administrative Services, State Purchasing Bureau	Cooperative purchasing agreement	$623,348.90
Allvest Information Services	Vant4ge Static Risk Assessment	Criminal risk assessment system	NE Department of Correctional Services	Competitive bidding	$1,005,800.00
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things		Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
Confi-Chek/Enformion	Enformion for Fraud and Case Investigations (EFCI); Enformion Enterprise Web	Automated fraud detection and investigation system	NE Department of Administrative Services, State Purchasing Bureau	Cooperative purchasing agreement	$40,500
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)

Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

NEVADA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	NV Department of Administration, Purchasing Division	Cooperative purchasing agreement	$623,348.90

Thomson Reuters	Pondera's FraudCaster	Automated benefits fraud prediction system using risk scores	NV Department of Health & Human Services, Division of Welfare and Supportive Services		$2,725,271.00
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00

SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

NEW HAMPSHIRE

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)

| Submittable | Submittable Fraud Prevention and Identity Verification | Automated identity verification and fraud detection system | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | $2,700.00 |
| Webauthor | Case Allocation Rotation System | Automated child and family services case assignment and management system | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | $51,426 |

NEW JERSEY

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	NJ Department of the Treasury, Division of Purchase and Property	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)

Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

NEW MEXICO

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	NM General Services Department, State Purchasing Division	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83

LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

NEW YORK

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
LexisNexis Risk Solutions	Accurint	Automated fraud detection and identity verification system	NY Office of the Attorney General	Competitive bid process	$553,314.00

NORTH CAROLINA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Optum	Optum Medicaid Management Information System (MMIS)	Automated Medicaid management system	NC Department of Health and Human Services	Cooperative purchasing agreement	$109,539,937.37

NORTH DAKOTA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ProudCrowd	Care19 Alert app	Automated COVID-19 alerts	ND Department of Health	Competitive bid process	$9,500.00

OHIO

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Deloitte Consulting	Automated Child Welfare Information System (SACWIS)	Automated child welfare case management system	OH Department of Job and Family Services	Competitive bid process	$4,863,222.00
Deloitte Consulting	Ohio Pandemic Unemployment Assistance (PUA) System	Automated pandemic unemployment system	OH Department of Job and Family Services	Unclear (no full contract found)	$37,267,566.04
F5 (Carahsoft)	Shape Defense Fraud Detection System	Automated fraud detection system	OH Department of Job and Family Services	Cooperative purchasing agreement	$548,919.00
LexisNexis Risk Solutions	Unnamed LexisNexis Fraud Detection System	Automated fraud detection system	OH Department of Job and Family Services	Unclear (no full contract found)	$794,946.20

OKLAHOMA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Confi-Chek/Enformion	Enformion for Fraud and Case Investigations (EFCI); Enformion Enterprise Web	Automated fraud detection and investigation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$40,500

OREGON

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	OR Department of Administrative Services, Procurement Services	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

PENNSYLVANIA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)

Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00

RHODE ISLAND

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00

| Webauthor | Case Allocation Rotation System | Automated child and family services case assignment and management system | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | $51,426 |

SOUTH CAROLINA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
IBM	Cúram	Automated data analytics and predictive intelligence services, among other things	SC Department of Health and Human Services	Competitive bid process	$22,700,000.00

SOUTH DAKOTA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)

| Submittable | Submittable Fraud Prevention and Identity Verification | Automated identity verification and fraud detection system | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | $2,700.00 |
| Webauthor | Case Allocation Rotation System | Automated child and family services case assignment and management system | UT Division of Purchasing (Lead State) | Cooperative purchasing agreement | $51,426 |

TENNESSEE

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	TN Department of General Services, Central Procurement Office	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)

Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

TEXAS

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
On-Point Technologies	Aggregate Workforce Analytics Reporting Engine (AWARE)	Automated fraud detection system, including SUTA dumping detection	TX Workforce Commission	Competitive bid process	$250,000.00

UTAH

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	Utah Division of Purchasing and General Services	Cooperative purchasing agreement	$623,348.90

ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

VERMONT

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	VT Department of Buildings and General Services, Office of Purchasing and Contracting	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00

Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426
TCC Software Solutions	Ascend & eXpedite	Automated data analytics and program management systems	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
TCC Software Solutions	EAPConnect	Automated LIHEAP data management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly service rates provided)
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

VIRGINIA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Deloitte Consulting	Deloitte Risk Analytics	AI risk intelligence and management system	VA IT Agency	Competitive bid process	$40,000,000.00

WASHINGTON

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
SHI International	Pondera's FraudCaster, CaseTracker, IDRA Results Viewer, & Appriss Monitoring	AI fraud detection, case management, and monitoring services	WA Department of Enterprise Services	Cooperative purchasing agreement	$623,348.90
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

Deloitte Consulting	Program Integrity Interactive SaaS	Automated public benefits management and allocation system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$1,348,756.65
Quest Media & Supplies	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	$197,921.00
SHI International	Cardinality.ai	AI case management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Clairvoyant	Zero-code AI analytics platform, among other services	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	WhoIAm	Automated identity verification and fraud prevention system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)
SHI International	Rezolve.ai	Generative AI service desk	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear (only hourly rates listed)

WEST VIRGINIA

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54

Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

WISCONSIN

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Northpointe	COMPAS Risk Assessment	Criminal risk assessment that uses "criminogenic factors"	WI Department of Corrections	Competitive bidding	$5,784,009.00
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)
Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

WYOMING

Vendor	System	Description	Agency	Procurement Process	Estimated Cost
ABBYY USA Software House	Automation Anywhere	Automated information extraction and document analysis, among other things	UT Division of Purchasing (Lead State)	Cooperating purchasing agreement	Unclear ($1.00 unit price listed)
LexisNexis	AmplifyID	AI identify verification and fraud prevention	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$17,079.43
LexisNexis	Batch Services	Automated data matching, validation, and processing service	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$5,821.83
LexisNexis	FraudPoint	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($10.01 price listed)
Merative	Cúram	Automated data analytics and predictive intelligence services, among other things	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$7,541.54
Thomson Reuters (Carahsoft)	Pondera's FraudCaster	AI fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$115,595.00
Socure	Sigma Synthetic Fraud	AI fraud prediction system using risk scores	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	Unclear ($1.03 price listed)

Submittable	Submittable Fraud Prevention and Identity Verification	Automated identity verification and fraud detection system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$2,700.00
Webauthor	Case Allocation Rotation System	Automated child and family services case assignment and management system	UT Division of Purchasing (Lead State)	Cooperative purchasing agreement	$51,426

Endnotes

[1] Deirdre K. Mulligan & Kenneth A. Bamberger, *Procurement as Policy: Administrative Process for Machine Learning*, 34 Berkeley Tech. L.J. 781, 781 (2019).

[2] *Id.* at 796.

[3] For more on EPIC's research in this area, see EPIC, Screened & Scored in the District of Columbia (2022), https://epic.org/wp-content/uploads/2022/11/EPIC-Screened-in-DC-Report.pdf [hereinafter "Screened & Scored Report"].
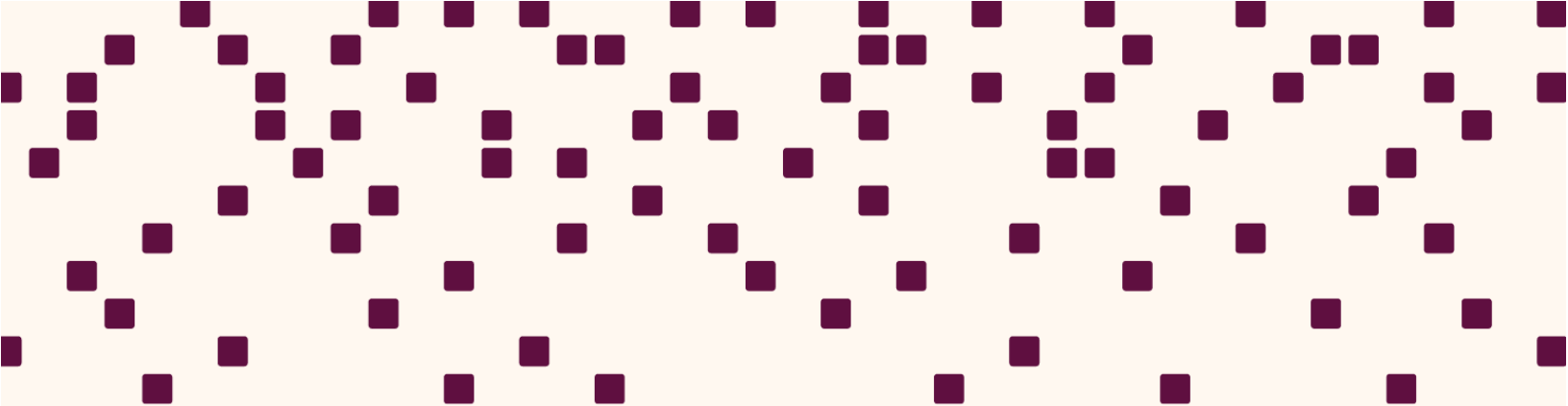
[4] *Cf.* Virginia Eubanks, Automating Inequality: How High-Tech Tools Profile, Police, and Punish the Poor 33–34 (2019) (discussing decades-old shift toward private "computerized" systems).

[5] *See* Appendix B; Screened & Scored Report at 12–14.

[6] *See, e.g.*, Tony Romm, *Underfunded, Understaffed and Under Siege: Unemployment Offices Nationwide are Struggling to Do Their Jobs*, Wash. Post (Apr. 6, 2020), https://perma.cc/SKM8-6EAV.

[7] *See, e.g.*, Drew DeSilver, *What the Data Says About Food Stamps in the U.S.*, Pew Rsch. Ctr. (July 19, 2023), https://www.pewresearch.org/short-reads/2023/07/19/what-the-data-says-about-food-stamps-in-the-u-s/; Bradley Corallo, *Analysis of National Trends in Medicaid and CHIP Enrollment During the COVID-19 Pandemic*, KFF (Apr. 4, 2023), https://www.kff.org/coronavirus-covid-19/issue-brief/analysis-of-recent-national-trends-in-medicaid-and-chip-enrollment/#:~:text=Data%20show%20that%20Medicaid%2FCHIP,80.6%25%20(Figure%202).

[8] Eubanks, *supra* note 4, at 46.

[9] For more on the issues around privatizing public services, see generally Donald Cohen & Allen Mikaelian, The Privatization of Everything: How the Plunder of Public Goods Transformed America and How We Can Fight Back (2021); Mark Levinson, *The Privatization Myth*, Am. Prospect (Apr. 8, 2022), https://prospect.org/culture/books/privatization-myth-cohen-mikaelian-review/.

[10] Contract between D.C. Dep't of Human Services and Pondera Solutions 7, https://perma.cc/9SCU-GSFW.
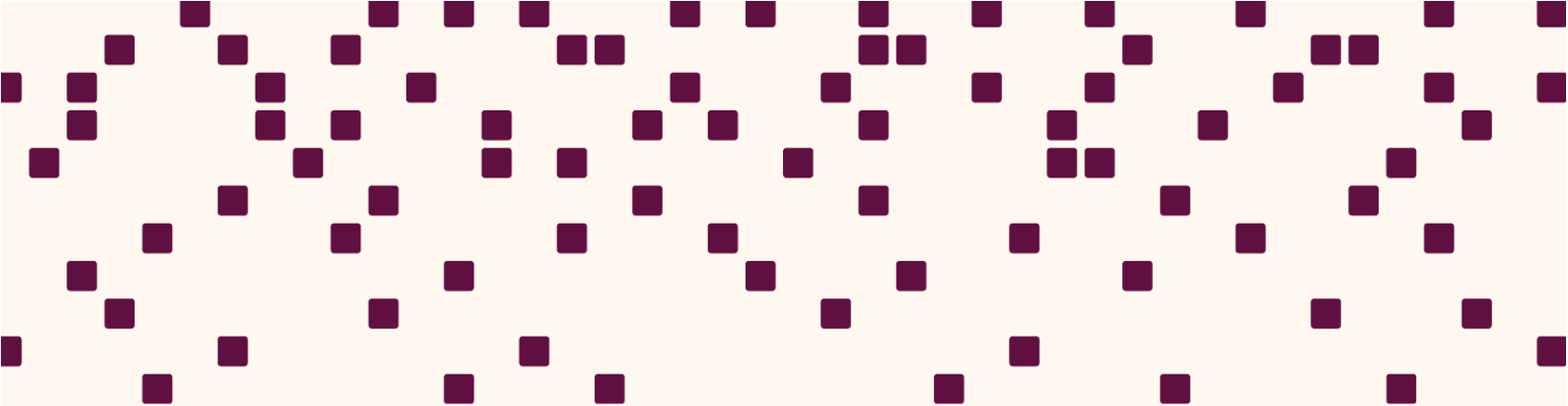
[11] *See* Mulligan & Bamberger, *supra* note 1, at 781, 786.

[12] *See, e.g.*, Robert Brauneis & Ellen P. Goodman, *Algorithmic Transparency for the Smarty City*, 20 Yale J.L. & Tech. 103, 138–44 (2018) (agencies using trade secrecy to limit response to open records requests about AI systems); Danielle Citron, *Open Code Governance*, 2008 U. Chi. L.F. 355, 357 (2008) ("Because these systems' software is proprietary, the source code—the programmers' instructions to the computer—is secret."). For potential solutions to the trade secret problem, see Frank Pasquale, *Restoring Transparency to Automated Authority*, 9 J. Telecomm. & High Tech. L. 235, 235–36 (2011); Katherine Fink, *Opening the Government's Black Boxes: Freedom of Information and Algorithmic Accountability*, Info., Comm. & Soc'y 1–19 (May 30, 2017), https://perma.cc/ATP4-KRZ8.

[13] *See, e.g.*, Alfred Ng, *Data Brokers Resist Pressure to Stop Collecting Info on Pregnant People*, Politico (Aug. 1, 2022), https://www.politico.com/news/2022/08/01/data-information-pregnant-people-00048988.

[14] *See, e.g.*, Richard Gowdin, *'You Can Track Everything': The Parents Who Digitise Their Babies' Lives*, Guardian (Mar. 2, 2019), https://www.theguardian.com/lifeandstyle/2019/mar/02/apps-that-track-babies-and-give-data-to-tech-firms-parents.

[15] *See id.*; Anna Werner, *Experts Warn Smart Toys for Children Could be Collecting User Data That Might be Sold*, CBS News (Dec. 29, 2022), https://www.cbsnews.com/news/smart-toys-data-collecting-advertisers/; Drew Harwell, *AI Baby Monitors Attract Anxious Parents: 'Fear is the Quickest Way to Get People's Attention,'* Wash. Post (Feb. 25, 2020), https://www.washingtonpost.com/technology/2020/02/25/ai-baby-monitors/ (detailing

how smart baby monitors collect information about babies' faces and cries to further train their algorithms).

16 *See* Drew Harwell, *Now for Sale: Data on Your Mental Health*, Wash. Post (Feb. 13, 2023), https://www.washingtonpost.com/technology/2023/02/13/mental-health-data-brokers/.

17 *See, e.g.*, Justin Sherman, *How Shady Companies Guess Your Religion, Sexual Orientation, and Mental Health*, Slate (Apr. 26, 2023), https://slate.com/technology/2023/04/data-broker-inference-privacy-legislation.html; Jon Keegan, *Forget Milk and Eggs: Supermarkets are Having a Fire Sale on Data About You*, Markup (Feb. 16, 2023), https://themarkup.org/privacy/2023/02/16/forget-milk-and-eggs-supermarkets-are-having-a-fire-sale-on-data-about-you; Marissa Newman, *Meta Was Scraping Sites for Years While Fighting the Practice*, Bloomberg (Feb. 2, 2023), https://www.bloomberg.com/news/articles/2023-02-02/meta-was-scraping-sites-for-years-while-fighting-the-practice; Dave Davies, *User's Beware: Apps are Using a Loophole in Privacy Law to Track Kids' Phones*, NPR (June 16, 2022), https://www.npr.org/2022/06/16/1105212701/users-beware-apps-are-using-a-loophole-in-privacy-law-to-track-kids-phones; Yael Grauer, *What are 'Data Brokers,' and Why Are They Scooping Up Information About You?*, Vice (Mar. 27, 2018), https://www.vice.com/en/article/bjpx3w/what-are-data-brokers-and-how-to-stop-my-private-data-collection; Julie Cohen, *The Biopolitical Public Domain: The Legal Construction of the Surveillance Economy*, 31 Phil. & Tech. 213, 219–20 (2017) (describing the "extension of surveillance capability" over time to capture personal and biometric information through sensing networks and facial recognition technology).

18 Danielle Citron & Daniel J. Solove, *Privacy Harms*, 102 B.U. L. Rev. 793, 845–55 (2022).

19 Eubanks, *supra* note 4, at 36–38, 45–49.

20 One example is the Meta Pixel. *See, e.g.*, Surya Mattu et al., *How We Built a Meta Pixel Inspector*, Markup (Apr. 28, 2022), https://themarkup.org/show-your-work/2022/04/28/how-we-built-a-meta-pixel-inspector; *see also* Dave Davies, *User's Beware: Apps are Using a Loophole in Privacy Law to Track Kids' Phones*, NPR (June 16, 2022), https://www.npr.org/2022/06/16/1105212701/users-beware-apps-are-using-a-loophole-in-privacy-law-to-track-kids-phones; Colin Lecher, *Who's Allowed to Track My Kids Online?*, Markup (Mar. 10, 2020), https://themarkup.org/the-breakdown/2020/03/10/websites-tracking-kids-coppa.

[21] *See* Justin Sherman, *How Shady Companies Guess Your Religion, Sexual Orientation, and Mental Health*, Slate (Apr. 26, 2023), https://slate.com/technology/2023/04/data-broker-inference-privacy-legislation.html.

[22] *See* Yael Grauer, *What are 'Data Brokers,' and Why are They Scooping Up Information About You?*, Vice (Mar. 27, 2018), https://www.vice.com/en/article/bjpx3w/what-are-data-brokers-and-how-to-stop-my-private-data-collection.

[23] Screened & Scored Report at 25; *see also* RentGrow, Inc., *Privacy Statement: Privacy Rights of our Online Visitors*, https://perma.cc/2PS6-HXQT.
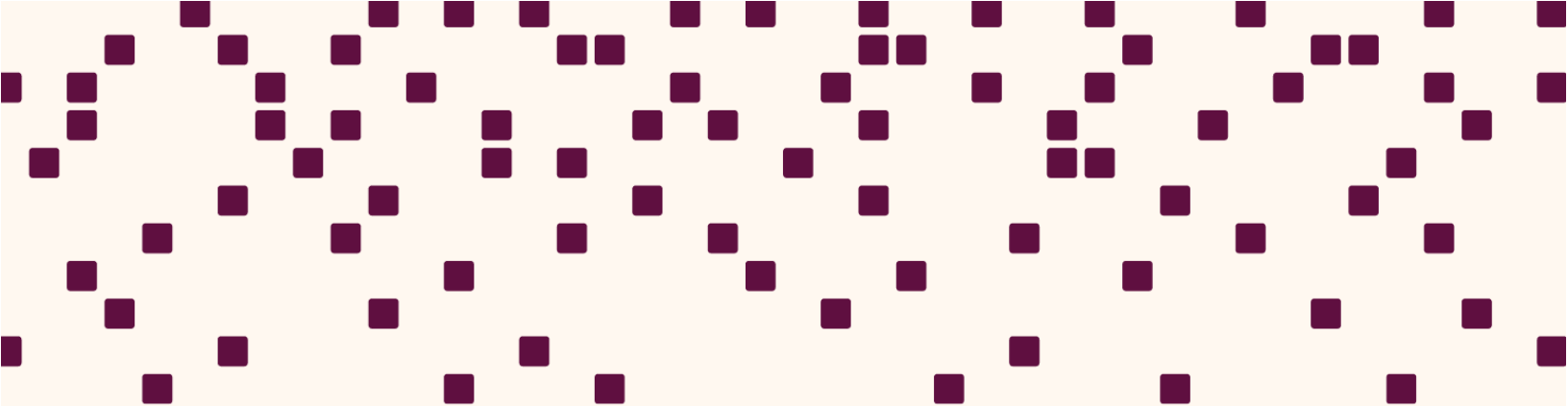
[24] Screened & Scored Report at 29; *see also* Sarah Lamdan, Data Cartels: The Companies That Control and Monopolize Our Information 27–49 (2023).

[25] *See, e.g.*, Contract between Ind. Dep't Workforce Dev. And Pondera Solutions (2021), https://epic.org/wp-content/uploads/2023/09/PonderaContractwWorkforceDevelopment.pdf; Contract between D.C. Dep't Human Services and Pondera Solutions (2020), https://epic.org/wp-content/uploads/2022/06/EPIC-21-06-25-DC-DHS-FOIA-20210719-Production-Pondera-Contract.pdf; Contract between Ill. Dep't Emp. Sec. and Pondera Solutions (2020), https://epic.org/wp-content/uploads/2022/06/EPIC-21-10-22-IL-IDES-FOIA-20211110-Illinois-Pondera-Contract.pdf; Contract between Iowa Dep't Pub. Health and Pondera Solutions (2019), https://epic.org/wp-content/uploads/2023/09/FY19_Service_Contract_Pondera_Solutions.pdf. Thomson Reuters acquired Pondera Solutions in 2020, incorporating Pondera's FraudCaster system into its own product offerings. *See* Screened & Scored Report at 24.

[26] D.C. Dep't of Human Services, *Pondera Proposal* 7 (May 4, 2020), https://perma.cc/9SCU-GSFW.

[27] *See* Thomas Brewster, *States Spent Millions on Deloitte's 'Anti-Fraud' Covid Unemployment Systems. They Suffered Billions in Fraud*, Forbes (Oct. 31, 2022), https://www.forbes.com/sites/thomasbrewster/2022/10/31/covid-pandemic-fraud-hits-billions-despite-deloitte-contracts-worth-hundreds-of-millions/?sh=21e08ba0669f.

[28] Alan Suderman, *DC Police Victim of Massive Data Leak by Ransomware Gang*, AP News (May 13, 2021), https://perma.cc/YXG5-ZPVJ.

[29] Mulligan & Bamberger, *supra* note 1, at 786.

[30] *Id.*

[31] Screened & Scored Report at 17, 19–21; *see* Mary Flanagan et al., *Embodying Values in Technology: Theory and Practice*, *in* Information Technology and Moral Philosophy 322, 322–47 (Jeroen van den Hoven & John Weckert eds., 2008).

[32] *See* Julia Angwin et al., *Machine Bias*, ProPublica (May 23, 2016), https://www.propublica.org/article/machine-bias-risk-assessments-in-criminal-sentencing. *See generally* EPIC, Liberty at Risk: Pre-Trial Risk Assessment Tools in the U.S. (2020), https://epic.org/documents/liberty-at-risk/.

[33] *Id.*

[34] *Id.*

[35] *Id.*

[36] *See* Anya E.R. Prince & Daniel Schwarcz, *Proxy Discrimination in the Age of Artificial Intelligence and Big Data*, 105 Iowa L. Rev. 1257 (2020), https://perma.cc/SC2T-8RHN; Ruha Benjamin, Race After Technology 1 (2019).
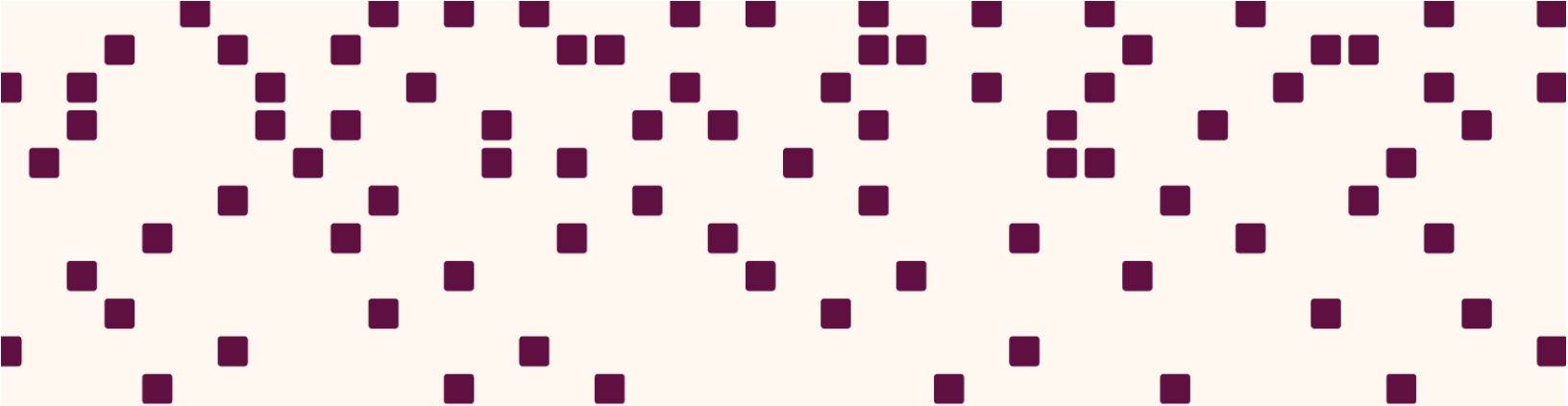
[37] *Id.*; *see also* CFPB, Using Publicly Available Information to Proxy for Unidentified Race and Ethnicity (2014), https://files.consumerfinance.gov/f/201409_cfpb_report_proxy-methodology.pdf.

[38] *See* Mulligan & Bamberger, *supra* note 1, at 786.

[39] Robert Brauneis & Ellen P. Goodman, *Algorithmic Transparency for the Smart City*, 20 Yale J.L. & Tech. 103, 152 (2018).

[40] *See* Screened & Scored Report at 18.

[41] *See, e.g.*, Nat'l Inst. Standards & Tech., Artificial Intelligence Risk Management Framework (AI RMF 1.0) 28 (2023), https://nvlpubs.nist.gov/nistpubs/ai/NIST.AI.100-1.pdf [hereinafter "NIST AI Risk Management Framework"].

42 *See, e.g.*, Nat'l Inst. Standards & Tech., NIST AI Risk Management Framework Playbook: Measure 6–31 (2023), https://github.com/usnistgov/AIRMF/blob/nist-pages/measure/measure.pdf.

43 *See, e.g.*, Joshua A. Kroll et al., *Accountable Algorithms*, 165 U. Pa. L. Rev. 633, 633 (2017).

44 *See id.* at 17–18.

45 *Id.* Many private companies argue that revealing how AI systems work would embolden fraudsters to seek out flaws or loopholes. *See id.* at 18; *see also* Thomson Reuters, *Follow the Money: Fighting Fraud in the Unemployment Insurance System During COVID-19*, https://perma.cc/BYR6-M7XA.

46 *See* Ryan Calo & Danielle Citron, *The Automated Administrative State: A Crisis of Legitimacy*, 70 Emory L.J. 797, 799, 804, 813, 816, 818 (2021); Edward H. Stiglitz, *Delegating for Trust*, 166 Pa. L. Rev. 633, 635 (2018) ("[T]he dominant explanation of and justification for the administrative state is based on agencies' expertise and expansive rulemaking and adjudicatory capacities."); *Mistretta v. United States*, 488 U.S. 361, 372 (1989).
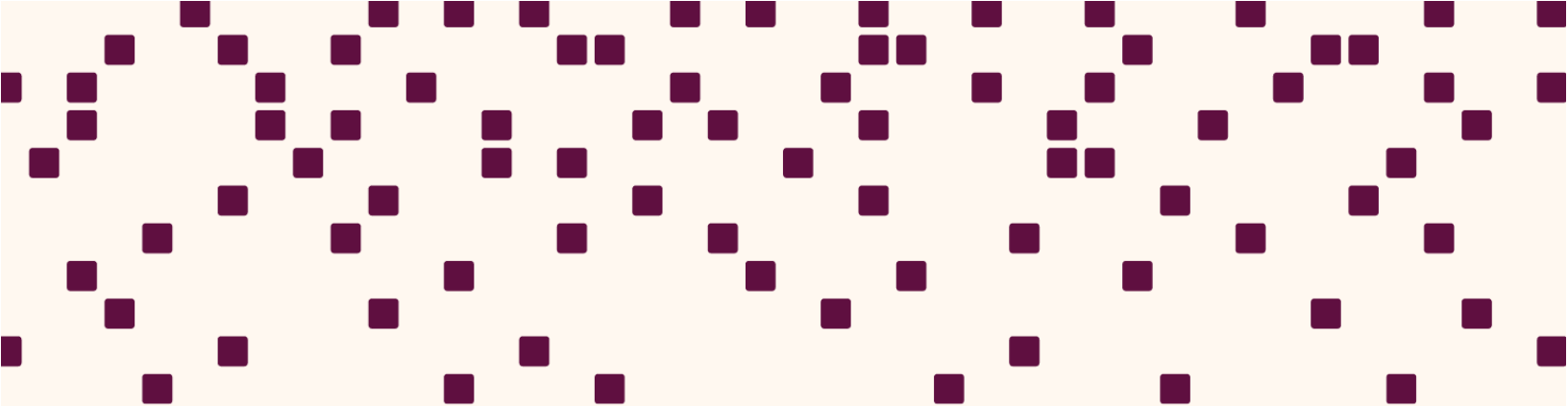
47 *Id.*

48 *Id.* at 818.

49 *Id.* at 811–16.

50 *Id.* at 813; *see also* Gillian E. Metzger, *Delegation, Accommodation, and the Permeability of Constitutional and Ordinary Law*, *in* The Oxford Handbook of the U.S. Constitution 422 (Mark Tushnet, Mark. A. Graber & Sanford Levinson eds., 2015).

51 *Id.* at 799–800.

52 *See* Mulligan & Bamberger, *supra* note 1, at 787–88.

53 *Id.* at 781.

[54] *Id.* at 781.

[55] *See* Screened & Scored Report at 26; Paul W. Grimm et al., *Artificial Intelligence as Evidence*, 19 Nw. J. Tech. & Intell. Prop. 9, 47 (2021) (describing tendency for humans to favor results from AI systems as objective and discount contradictory evidence).

[56] Lydia X. Z. Brown et al., Center for Democracy and Technology, Challenging the Use of Algorithm-Driven Decision-Making in Benefits Determinations Affecting People with Disabilities 31–35 (2020), https://cdt.org/wp-content/uploads/2020/10/2020-10-21-Challenging-the-Use-of-Algorithm-driven-Decision-making-in-Benefits-Determinations-Affecting-People-with-Disabilities.pdf.

[57] Eubanks, *supra* note 4, at 33–34.

[58] *See* Virginia Eubanks, *The Digital Poorhouse*, Harper's Magazine (Jan. 2018), https://harpers.org/archive/2018/01/the-digital-poorhouse/.
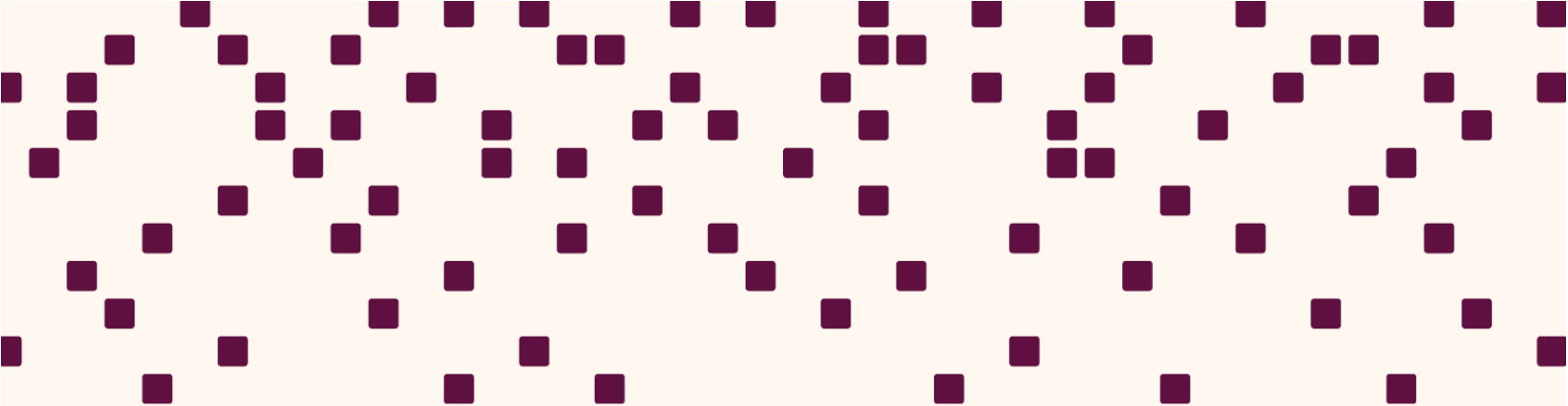
[59] *See, e.g.*, Screened & Scored Report at 12–14.

[60] Donald Cohen, The privatization of everything

[61] *See* Oregon Department of Human Services, SPD Oregon ACCESS Inquiry Training Guide (2014), https://www.dhs.state.or.us/spd/tools/training/ACCESS%20Inquiry_Combined.pdf.

[62] *See, e.g.*, Hannah Dreyfus, *States are Hoarding $5.2 Billion in Welfare Funds Even as the Need for Aid Grows*, ProPublica (Dec. 29, 2021), https://www.propublica.org/article/states-are-hoarding-52-billion-in-welfare-funds-even-as-the-need-for-aid-grows.

[63] *See, e.g.*, Alfred Ng, *Data Brokers Raise Privacy Concerns—But Get Millions from the Federal Government*, Politico (Dec. 21, 2022), https://www.politico.com/news/2022/12/21/data-brokers-privacy-federal-government-00072600; Jonas Persson & Mary Bottari, *Privatization Fail: The Troubled history of Maximus Inc.*, PR Watch (Oct. 24, 2014), https://www.prwatch.org/news/2014/10/12638/privatization-fail-troubled-history-maximus-inc. For more on state surveillance, see, e.g., EPIC Complaint to the D.C. Office of the Attorney General, *In Re Online Test Proctoring Companies* (Dec. 9, 2020),

https://epic.org/privacy/dccppa/online-test-proctoring/EPIC-complaint-in-re-online-test-proctoring-companies-12-09-20.pdf; Jake Wiener & Jeramie Scott, *NY City Council Bills 1014-23 and 1024-23 Banning Biometric Surveillance in Places of Public Accommodation and Housing*, EPIC (May 5, 2023), https://epic.org/ny-city-council-bills-1014-23-and-1024-23-banning-biometric-surveillance-in-places-of-public-accommodation-and-housing/.

[64] *See, e.g.*, Harish Hemmige et al., *Five Ways to Speed Up Government Procurement*, Boston Consulting Group (Nov. 7, 2018), https://www.bcg.com/publications/2018/five-ways-speed-up-government-procurement.

[65] *See* Geoff Orazem et al., *Why Startups Don't Bid on Government Contracts*, BCG (Aug. 22, 2017), https://www.bcg.com/publications/2017/public-sector-agency-transformation-why-startups-dont-bid-government-contracts.

[66] *See* Grant Fergusson, *Public Benefits, Private Vendors: How Private Companies Help Run Our Welfare Programs*, EPIC Blog (Jan. 26, 2023), https://epic.org/public-benefits-private-vendors-how-private-companies-help-run-our-welfare-programs/.

[67] *See, e.g.*, 47 C.F.R. § 54.622 (example of competitive bidding exemptions taken from FCC regulations).

[68] *See, e.g.*, Contract between Ill. Dep't Emp. Sec. and Deloitte Consulting (2020), https://epic.org/wp-content/uploads/2023/09/EPIC-22-12-19-IL-IDES-FOIA-20221222-Full-Illinois-Deloitte-PUA-Contract.pdf.

[69] This COVID-19 relief fund was established under the CARES Act. *See Coronavirus Relief Fund*, U.S. Dep't of the Treasury, https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/coronavirus-relief-fund.

[70] *See* Brewster, *supra* note 27.

[71] *Id.*; *see also, e.g.*, Contract between Mich. Dep't Tech., Management, & Budget and Deloitte Consulting (2023), https://epic.org/wp-content/uploads/2023/09/Michigan-Deloitte-uFACTS-Contract.pdf; Contract between Ill. Dep't Emp. Sec. and Deloitte Consulting (2020), https://epic.org/wp-content/uploads/2023/09/EPIC-22-12-19-IL-IDES-FOIA-20221222-Full-Illinois-Deloitte-PUA-Contract.pdf.

[72] *See, e.g.*, *Carahsoft Technology Corporation*, NASPO ValuePoint, https://www.naspovaluepoint.org/portfolio/cloud-solutions-2016-2026/carahsoft-technology-corporation/; *Deloitte Consulting*, NASPO ValuePoint, https://www.naspovaluepoint.org/portfolio/cloud-solutions-2016-2026/deloitte-consulting/; *Quest Media & Supplies, Inc.*, https://www.naspovaluepoint.org/portfolio/cloud-solutions-2016-2026/quest-media-supplies-inc/; *SHI International Corp.*, NASPO ValuePoint, https://www.naspovaluepoint.org/portfolio/cloud-solutions-2016-2026/shi-international-corp/; *TCC Software Solutions*, NASPO ValuePoint, https://www.naspovaluepoint.org/portfolio/cloud-solutions-2016-2026/tcc-software-solutions/.

[73] *Id.* (some vendors like Thomson Reuters and LexisNexis have products within larger portfolios held by companies like Carahsoft and SHI International).
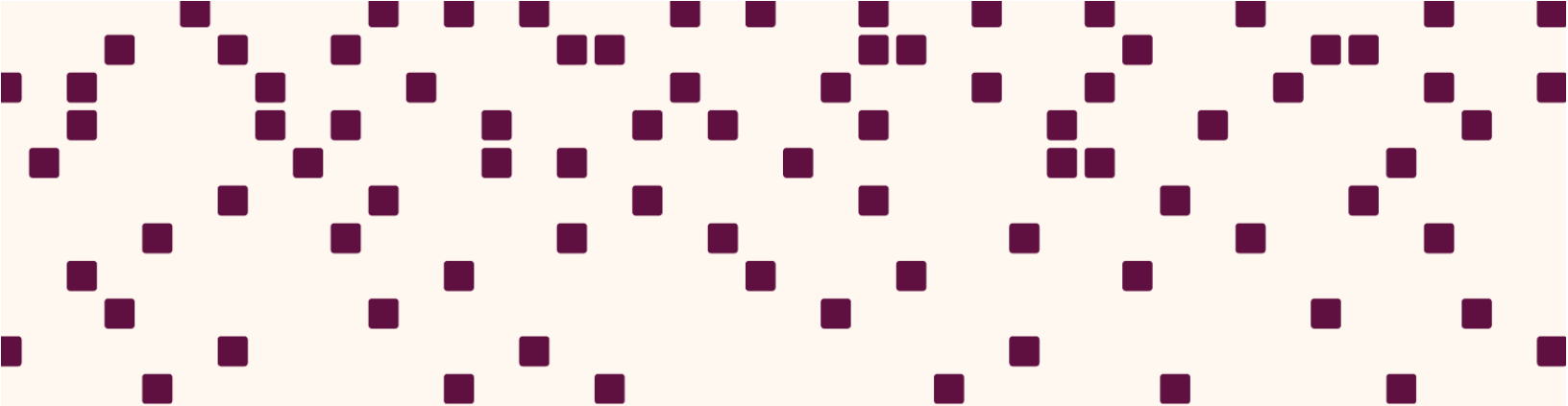
[74] *See* Calo & Citron, *supra* note 46, at 819–23, 832.

[75] *See* Sandra Wachter & Brent Mittelstadt, *A Right to Reasonable Inferences: Re-Thinking Data Protection Law in the Age of Big Data and AI*, Colum. Bus. L. Rev. 9–28 (2019).

[76] *See* Calo & Citron, *supra* note 46, at 825; Danielle Citron & Frank Pasquale, *The Scored Society: Due Process for Automated Predictions*, 89 Wash. L. Rev. 1, 1 (2014), http://www.datascienceassn.org/sites/default/files/The%20Scored%20Society%20-%20Due%20Process%20for%20Automated%20Predictions.pdf.

[77] *See, e.g.*, Carahsoft Master Agreement with Aisera Pricing Schedule (2016), https://epic.org/wp-content/uploads/2023/09/Carahsoft-NASPO-Master-Agreement-Aisera-Pricing-Schedule.pdf; SHI International Master Agreement Covering Cardinality.AI and Clairvoyant AI services (2016), https://epic.org/wp-content/uploads/2023/09/1493707100_CloudSolutions_SHI_UT_2016-2026_ExecutedPA21.pdf.

[78] *See generally* EPIC, *Generating Harms: Generative AI's Impact & Paths Forward* (2023), https://epic.org/wp-content/uploads/2023/05/EPIC-Generative-AI-White-Paper-May2023.pdf.

[79] *See Unemployment Claims Management Services*, Deloitte, https://www2.deloitte.com/us/en/pages/public-sector/solutions/unemployment-insurance-services.html.

[80] *See Optum Program Integrity Solutions for Medicaid*, Optum, https://www.optum.com/business/state-government/analytics/medicaid-program-integrity.html.

[81] *See, e.g.*, Contract between Mont. Dep't Pub. Health & Hum. Servs. and Optum Insight (2018), https://epic.org/wp-content/uploads/2023/09/1548274042_Montana-OptumPA.pdf. *See generally* NASPO ValuePoint, https://www.naspovaluepoint.org/#!.

[82] *See* Accenture, https://www.accenture.com/us-en/about/company-index.

[83] *See* Request for Proposals and Contract Award between Ariz. Health Care Cost Containment System and Accenture (2020), https://epic.org/wp-content/uploads/2023/09/HEAplus-RFP-and-Contract-Award.pdf.

[84] *See* Aisera, https://aisera.com/products/; Carahsoft Master Agreement with Aisera Pricing Schedule (2016), https://epic.org/wp-content/uploads/2023/09/Carahsoft-NASPO-Master-Agreement-Aisera-Pricing-Schedule.pdf.

[85] Carahsoft Master Agreement with Aisera Pricing Schedule (2016), https://epic.org/wp-content/uploads/2023/09/Carahsoft-NASPO-Master-Agreement-Aisera-Pricing-Schedule.pdf.

[86] *See* Contract between Mich. Dep't Tech., Management, & Budget and Fast Enterprises (2011), https://epic.org/wp-content/uploads/2023/09/1300367-1.pdf.

[87] *See Michigan Unemployment Insurance False Fraud Determinations*, Benefits Tech Advocacy Hub, https://www.btah.org/case-study/michigan-unemployment-insurance-false-fraud-determinations.html.

[88] Adrienne Roberts, *Michigan's UIA Selects Deloitte to Replace Unemployment Insurance System*, Detroit Free Press (Nov. 15, 2022), https://www.freep.com/story/money/business/michigan/2022/11/15/michigan-unemployment-insurance-system-deloitte-midas-ufacts/69649312007/.

[89] *See Improve Fraud Detection and Prevention with Fraud Detect*, Thomson Reuters, https://legal.thomsonreuters.com/en/products/fraud-detect; Contract between Ind. Dep't Workforce Dev. And Pondera Solutions (2021), https://epic.org/wp-content/uploads/2023/09/PonderaContractwWorkforceDevelopment.pdf; Contract between D.C. Dep't Human Services and Pondera Solutions (2020), https://epic.org/wp-content/uploads/2022/06/EPIC-21-06-25-DC-DHS-FOIA-20210719-Production-Pondera-Contract.pdf; Contract between Ill. Dep't Emp. Sec. and Pondera Solutions (2020), https://epic.org/wp-content/uploads/2022/06/EPIC-21-10-22-IL-IDES-FOIA-20211110-Illinois-Pondera-Contract.pdf; Contract between Iowa Dep't Pub. Health and Pondera Solutions (2019), https://epic.org/wp-content/uploads/2023/09/FY19_Service_Contract_Pondera_Solutions.pdf.

[90] *Id.*

[91] *See* Joel Schectman, *South Carolina Upgrades Medicaid System to Prepare for ACA*, Wall St. J. (Apr. 23, 2013), https://www.wsj.com/articles/BL-CIOB-1910.
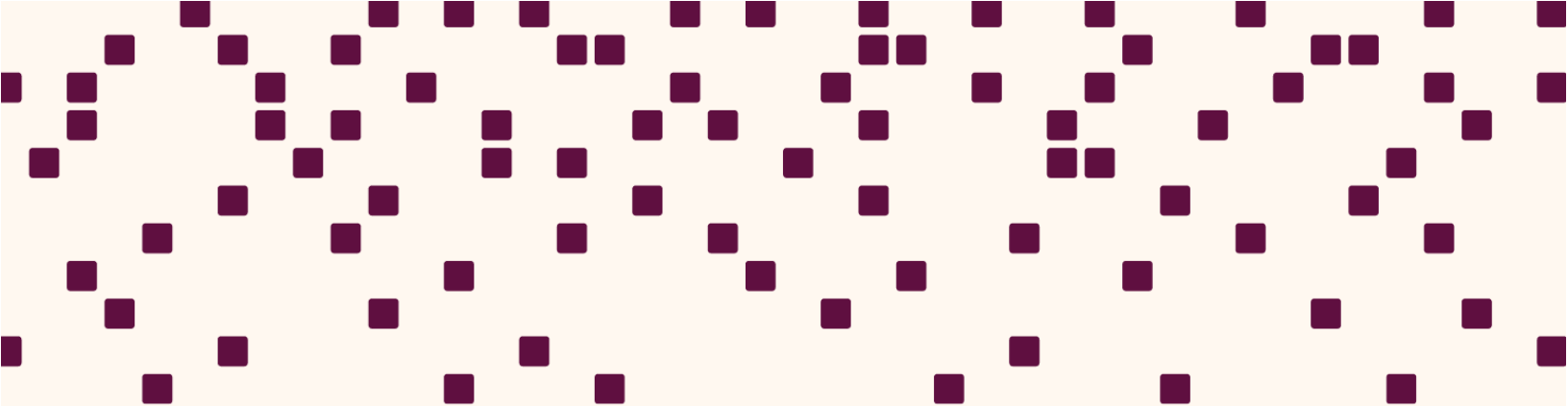
[92] *See* Mike Miliard, *Merative, a New Data Company, Formed from IBM's Healthcare Analytics Assets*, Healthcare IT News (July 5, 2022), https://www.healthcareitnews.com/news/merative-new-data-company-formed-ibms-healthcare-analytics-assets.

[93] *See Cúram: Transform the Delivery of Government Social Services*, Merative, https://www.merative.com/curam.

[94] *See AmplifyID*, LexisNexis Risk Solutions, https://risk.lexisnexis.com/products/amplifyid; *FraudPoint*, LexisNexis Risk Solutions, https://risk.lexisnexis.com/products/fraudpoint; *LexisNexis Accurint*, LexisNexis Risk Solutions, https://www.accurint.com/; Accurint Contract between N.Y. Off. Att'y Gen. and LexisNexis Risk Solutions (2023), https://epic.org/wp-content/uploads/2023/09/NY_AccurintContractPackage.pdf.

[95] *See, e.g.*, Sam Biddle, *LexisNexis is Selling Your Personal Data to ICE so It Can Try to Predict Crimes*, Intercept (June 20, 2023), https://theintercept.com/2023/06/20/lexisnexis-ice-surveillance-license-plates/.

[96] *See, e.g.*, *COMPAS*, State of Wisconsin Department of Corrections, https://doc.wi.gov/Pages/AboutDOC/COMPAS.aspx; Contract between Wis. Dep't

Corrections and Northpointe (2010), https://epic.org/wp-content/uploads/2023/09/EPIC-16-06-23-WI-Full-COMPAS-Contract.pdf.

97 *See Our Products*, Equivant, https://www.equivant.com/our-solutions/.

98 *See, e.g.*, Dara Kam, *State Agency Enlists Help From Businesses for Social Service Needs*, Palm Beach Post (Dec. 4, 2011), https://www.palmbeachpost.com/story/news/state/2011/12/05/state-agency-enlists-help-from/7592774007/; Carahsoft Master Agreement and Webauthor Pricing Schedule (2016), https://epic.org/wp-content/uploads/2023/09/1476918559_Carahsoft-MasterAgreement-WebauthorPricing.pdf.

99 Carahsoft Master Agreement with Aisera Pricing Schedule (2016), https://epic.org/wp-content/uploads/2023/09/Carahsoft-NASPO-Master-Agreement-Aisera-Pricing-Schedule.pdf.

100 *See* Wachter & Mittelstadt, *supra* note 75, at 9–28 (2019).

101 Contract between D.C. Housing Auth. and RentGrow (2018), https://epic.org/wp-content/uploads/2022/09/EPIC-21-03-25-DC-DCHA-FOIA-20210821-Production-RentGrow-Agreement26B.pdf.
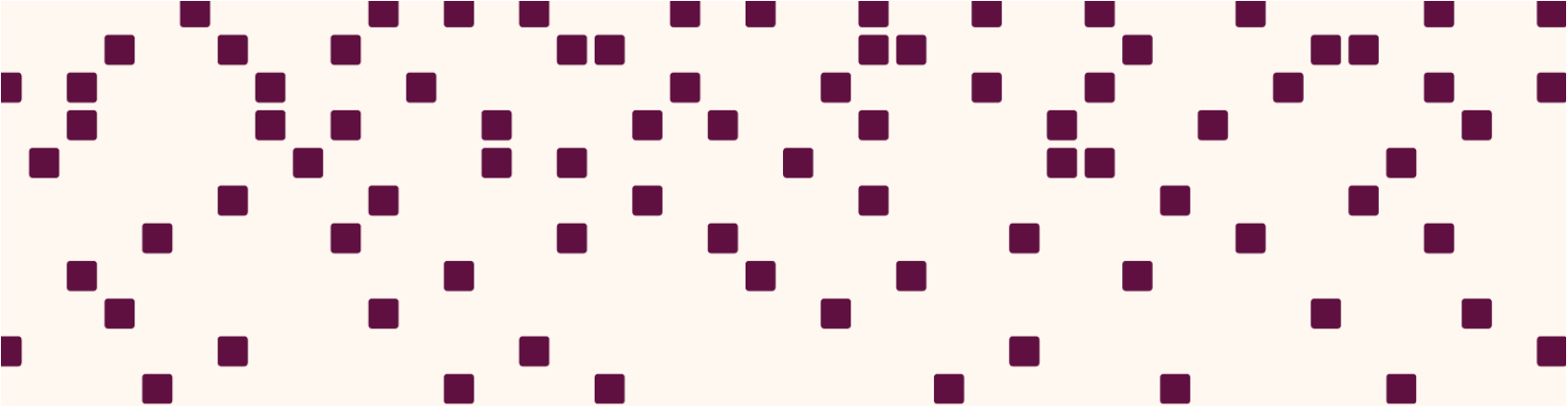
102 *See* Screened & Scored Report at 23.

103 Contract between Iowa Dep't Pub. Health and Pondera Solutions (2019), https://epic.org/wp-content/uploads/2023/09/FY19_Service_Contract_Pondera_Solutions.pdf.

104 Request for Proposals and Contract Award between Ariz. Health Care Cost Containment System and Accenture (2020), https://epic.org/wp-content/uploads/2023/09/HEAplus-RFP-and-Contract-Award.pdf.

105 Contract between Mich. Dep't Tech., Management, & Budget and Fast Enterprises (2011), https://epic.org/wp-content/uploads/2023/09/1300367-1.pdf.

106 *See Michigan Unemployment Insurance False Fraud Determinations*, Benefits Tech Advocacy Hub, https://www.btah.org/case-study/michigan-unemployment-insurance-false-fraud-determinations.html.

[107] Contract between Mich. Dep't Tech., Management, & Budget and Deloitte Consulting (2023), https://epic.org/wp-content/uploads/2023/09/Michigan-Deloitte-uFACTS-Contract.pdf.

[108] For more information on what testing procedures may be effective, see Nat'l Inst. Standards & Tech., NIST AI Risk Management Framework Playbook: Measure 6–31 (2023), https://github.com/usnistgov/AIRMF/blob/nist-pages/measure/measure.pdf.

[109] White House Office of Sci. & Tech. Pol'y, Blueprint for an AI Bill of Rights 20–21, 24, 38 (2022), https://www.whitehouse.gov/wp-content/uploads/2022/10/Blueprint-for-an-AI-Bill-of-Rights.pdf.

[110] *See* NIST AI Risk Management Framework at 16, 19, 26–30.

[111] *Cf.* Nat'l Inst. Standards & Tech., NIST AI Risk Management Framework Playbook: Measure 6–31 (2023), https://github.com/usnistgov/AIRMF/blob/nist-pages/measure/measure.pdf.

[112] *See, e.g.*, EPIC Feedback to the Nat'l Inst. Standards & Tech. Regarding the Artificial Intelligence Risk Management Framework: Second Draft 4–6 (Sept. 28, 2022), https://epic.org/documents/epic-comments-national-institute-of-standards-and-technology-ai-risk-management-framework/.

[113] Nat'l Inst. Standards & Tech., NIST AI Risk Management Framework Playbook: Measure 15, 18 (2023), https://github.com/usnistgov/AIRMF/blob/nist-pages/measure/measure.pdf.

[114] *See* Contract between D.C. Dep't Human Services and Pondera Solutions (2020), https://epic.org/wp-content/uploads/2022/06/EPIC-21-06-25-DC-DHS-FOIA-20210719-Production-Pondera-Contract.pdf.

[115] *See* Carahsoft Master Agreement with Aisera Pricing Schedule (2016), https://epic.org/wp-content/uploads/2023/09/Carahsoft-NASPO-Master-Agreement-Aisera-Pricing-Schedule.pdf.

[116] *See id.*

[117] Contract between D.C. Dep't Human Services and Pondera Solutions (2020), https://epic.org/wp-content/uploads/2022/06/EPIC-21-06-25-DC-DHS-FOIA-20210719-Production-Pondera-Contract.pdf.

[118] For example, the Michigan Unemployment Insurance Agency was forced to abandon its $47 million MiDAS system after litigation revealed thousands of false fraud allegations. *See Michigan Unemployment Insurance False Fraud Determinations*, Benefits Tech Advocacy Hub, https://www.btah.org/case-study/michigan-unemployment-insurance-false-fraud-determinations.html. To replace the faulty system, Michigan paid Deloitte $59 million. *See* Contract between Mich. Dep't Tech., Management, & Budget and Deloitte Consulting (2023), https://epic.org/wp-content/uploads/2023/09/Michigan-Deloitte-uFACTS-Contract.pdf.

[119] *See, e.g.*, RFP, Offeror Bid, and Contract between Ariz. Dep't Econ. Sec. and Geographic Solutions (2023), https://epic.org/wp-content/uploads/2023/09/Geographic-Solutions-Full-Contract-Package.pdf.
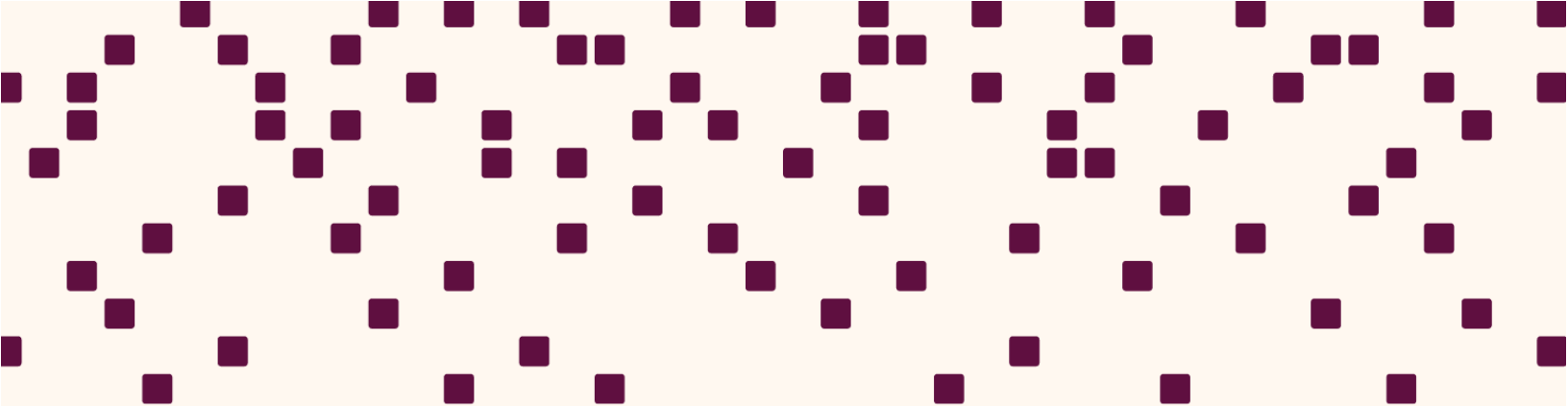
[120] *K.W. v. Armstrong*, No. 1:12-cv-00022-BLW-CWD, 2023 WL 5431801 (D. Idaho Aug. 23, 2023).

[121] *See* Michigan Supplemental Nutrition Assistance Program Terminations, *Benefits Tech Advocacy Hub*, https://www.btah.org/case-study/michigan-supplemental-nutrition-assistance-program-terminations.html.

[122] States like California have already experimented with private rights of action within AI legislation. *See* A.B. 311, 2023 State Assemb., Reg. Sess. (Cal. 2023). For more on state AI laws, see Katrina Zhu, *The State of State AI Laws: 2023*, EPIC Blog (Aug. 3, 2023), https://epic.org/the-state-of-state-ai-laws-2023/.

[123] *See e.g.*, *Michigan Supplemental Nutrition Assistance Program Terminations*, Benefits Tech Advocacy Hub, https://www.btah.org/case-study/michigan-supplemental-nutrition-assistance-program-terminations.html; MiDAS example; *Elder v. Gillespie*, 54 F.4th 1055 (8th Cir. 2022).

[124] *See, e.g.*, AI Now Institute, Biometric Surveillance is Quietly Expanding: Bright-Line Rules are Key (Apr. 11, 2023), https://ainowinstitute.org/publication/biometric-surveillance-is-quietly-expanding.

[125] The NIST AI Risk Management Framework is built on top of a risk tolerance model as well. *See* NIST AI Risk Management Framework 7–9.

[126] *Id.* at 8.

[127] EPIC could not access exact pricing information for each contract, either because no final pricing information was publicly available or because contracts included hourly and service-based rates not set to a fixed price in the contract. The estimated pricing information assumes that all services listed in each contract were used at least once by each participating state.