

Are you a covered deployer? Effective January 1, 2027

KEY TERM

ADMT — Automated Decision-Making Technology

Any system using computation, machine learning, statistics, or AI to make or materially contribute to a decision about a specific individual — including systems that substantially inform a human decision-maker.

Examples: AI hiring screeners, credit scoring models, insurance underwriting tools, tenant screening algorithms, clinical decision support software, benefits eligibility systems.

Does your organization use any software or system with AI or automated decision-making?

YES ↓

Q1 — Does the system make or contribute to a decision about a specific, identifiable person?

(Not aggregate analysis or infrastructure operations)

NO →

Out of scope for this system. e.g. grid optimization, demand forecasting, inventory AI

YES ↓

Q2 — Does that decision fall into a covered category?

Employment

Hiring, firing, compensation, scheduling, performance, promotion, demotion

Housing

Rental applications, tenant screening, lease decisions, occupancy

Financial Services

Credit, loans, mortgages, insurance underwriting & claims, banking account decisions, fintech, collections

Healthcare

Clinical decisions, prior authorization, treatment recommendations, care access (FDA-regulated devices exempt)

Education

Admissions, placement, financial aid, academic evaluation, discipline

Essential Services

Electricity, gas, water, internet/broadband, government benefits (Medicaid, SNAP, unemployment, housing assistance), municipal services (Full definition pending AG rulemaking)

NO →

Out of scope for this system.

YES ↓

Q3 — Does a statutory exemption apply?

HIPAA-covered entity (non-employment uses)

Insurer under existing CO algorithmic discrimination rules

Creditor satisfying ECOA / FCRA notice requirements

FDA-regulated medical device

EXEMPT →

Out of scope for that use. Document the exemption basis and retain on file.

NOT EXEMPT ↓

✓ YOU ARE A COVERED DEPLOYER

See Page 2 for your compliance obligations.

↑ Continued from Page 1: You are a Covered Deployer

Did you build the AI system yourself, or do you license / purchase it from a vendor?

YES — You are also a DEVELOPER

DEVELOPER + DEPLOYER OBLIGATIONS

- 1 All six deployer obligations at right apply in full.
- 2 **Technical documentation.** Provide to all downstream deployers: intended uses, known inappropriate uses, training data categories, and monitoring guidance.
- 3 **Changelogs.** Maintain version records for every material update to the system.
- 4 **Use documentation.** Document intended uses and all known inappropriate uses of the system.
- 5 **Retention.** Retain all developer documentation for a minimum of 3 years.

NO — You are a Deployer only

DEPLOYER COMPLIANCE OBLIGATIONS

- 1 **Pre-decision notice.** Notify individuals in writing before ADMT is used in any decision affecting them.
- 2 **Adverse action disclosure.** After a negative decision: what was decided, what personal data was used, and the basis for the outcome.
- 3 **Right of appeal.** Provide a meaningful opportunity for the individual to request human review of any AI-influenced adverse decision.
- 4 **Vendor documentation.** Obtain and retain the developer's technical documentation: intended uses, training data categories, known inappropriate uses, and monitoring guidance.
- 5 **Record retention.** Retain all compliance documentation, decision logs, ADMT version identifiers, and changelogs for a minimum of 3 years.
- 6 **Monitor rulemaking.** AG rules defining key terms are due before Jan 1, 2027. Review and update your program when finalized.

△ Key terms — including "materially contribute," "meaningful human review," and the full scope of Essential Services — remain undefined pending AG rulemaking. Build your program anchored to NIST AI RMF now; revise specific procedures when rules publish. A 60-day cure window applies before penalties attach (through January 1, 2030). No private right of action. Enforcement by Colorado Attorney General only.