

Accountability Layer Policy

The Accountability Layer Policy governs how a govtech compliance agent produces auditable decisions, how those decisions are explained to affected parties, what correction and appeal paths exist, and where human authority is irreducibly required. Public-sector AI deployments differ from commercial ones in one critical respect: an affected person — an applicant, a resident, a business — may have statutory rights to understand, challenge, and receive a human review of a determination that affects them. This policy operationalizes those rights as agent-design constraints, not as aspirational goals. It draws its traceability rules from s3-decision-traceability and its audit log structure from s2-audit-trail-schema, so that a compliance agent's audit trail is continuous with the broader GROW provenance system rather than a separate silo.

> Legal notice. Sections 3 and 4 of this policy contain provisions governing appeals, corrections, and human-authority limits that are legally operative in a public-sector context. All sections marked [ATTORNEY REVIEW] must be reviewed by qualified counsel before this policy is treated as binding for any deployment serving a Florida special district, county agency, or public body. The policy framework reflects general best practices; it does not constitute legal advice and does not substitute for jurisdiction-specific legal review.

1. Audit Log Requirements

Every compliance determination produced by t7-compliance-workflow must be logged to s2-audit-trail-schema in addition to the C9 provenance record. The two records serve different purposes: the audit record captures the full run (inputs, outputs, tool calls), while the provenance record captures the lineage trace. Neither substitutes for the other.

Mandatory audit-log fields for compliance runs:

Field	Required value
inputs	Full application payload hash + field inventory; NOT the raw PII content unless the deployment's data-handling policy permits [ATTORNEY REVIEW]
outputs	The determination summary text and the per-rule determination table
tool_calls	All GIS lookups, rule-map lookups, parcel-data retrievals
retrieval_sources	Every rule_id row retrieved from t7-jurisdiction-rule-map, with source_confidence
decision_trace	One entry per per-rule determination per C2 shape; decision_origin using the extended value compliance-determination or base escalation

The decision_trace must be complete. Per s3-decision-traceability, an output without a trace is not an output — it is a draft. A compliance determination with an incomplete decision_trace is gate-failing.

Retention. All compliance audit records carry retention_class: civic-7yr per s3-governance-retention-policy. [ATTORNEY REVIEW] — Florida public-records law (FS Chapter 119) may impose a different retention minimum for

the specific record type; counsel must map each record class to the applicable state retention schedule.

2. Explainability Standards

A compliance agent must be able to produce a plain-language explanation of any determination on demand. Explainability is not a post-hoc reporting feature; it is a design constraint on how the compliance workflow structures its per-rule determination records.

Per-determination explanation fields:

Each C9 record must carry enough information to generate an explanation without additional inference. Required explanation elements:

1. Which rule applied. The rule_id and its plain-language summary from t7-jurisdiction-rule-map.
2. What the agent evaluated. The specific field(s) in the application that triggered or satisfied the rule's agent_trigger condition.
3. What the determination was. The determination enum value and a one-sentence rationale in plain language.
4. What evidence supports it. The evidence_pointer must resolve to a human-readable document or log, not only a hash.
5. Who or what made the determination. The decision_origin field, translated to lay language: "automatically determined by the screening tool" (compliance-determination) or "referred to a qualified reviewer" (escalation) or "reviewed and confirmed by [role]" (human-override).

Explanation output. The clerk-facing determination summary produced in Phase 5 of t7-compliance-workflow must include all five elements above for each activated rule. The applicant-facing version must include elements 1, 3, 4, and 5 in accessible language free of internal system IDs. [ATTORNEY REVIEW]

Unsupported conclusion rule. Per s3-decision-traceability, any claim in an explanation that lacks a resolving evidence_pointer must be marked [unsupported] and may not be presented to an applicant as a determination. An unsupported claim routes to needs-review; the expert-review boundary applies.

3. Appeals and Correction Paths

A public-sector compliance agent must preserve the right of an affected party to seek human review of a determination. This section defines the correction and appeal path.

Applicant-initiated correction request. An applicant who believes a determination is factually incorrect (wrong parcel data used, form field misread, rule applied to wrong activity description) may submit a correction request. The correction path is:

1. Correction request received by the district clerk (not routed directly to the agent).

2. Clerk creates a correction record in s3-provenance-metadata-schema with decision_origin: human-override and a rationale describing the claimed error.
3. The stormwater-permit-triage agent (or equivalent) re-evaluates the flagged per-rule determination using the corrected input, producing a new C9 record. The prior record is not overwritten — the correction is append-only per s3-governance-retention-policy.
4. If the re-evaluation produces a different determination, the new determination supersedes the prior for all operational purposes; the original record is retained in the provenance store with a corrections[] pointer.
5. [ATTORNEY REVIEW] — the specific procedural rights an applicant holds under Florida administrative law (FS Chapter 120, the Administrative Procedure Act) with respect to agency determinations may impose additional requirements beyond this workflow.

Human-authority override. Any determination may be reviewed, modified, or overridden by the applicable human authority (district engineer, board of supervisors, county staff, depending on the rule). A human override is logged as a C2 HITL event with decision_origin: human-override and a rationale. The agent's determination is never treated as a final agency action; final authority rests with the human official. [ATTORNEY REVIEW]

Appeal to governing board. For special-district determinations, a formal appeal to the board of supervisors is available per the district's operating resolution. [ATTORNEY REVIEW] — the agent must not constrain or characterize the appeal path; it must surface the appeal-notice language provided by counsel rather than generating its own.

4. Human Authority Boundaries

These boundaries are absolute. The agent may not cross them autonomously; doing so is a critical-severity failure mode (unsafe-action-attempted in s1-failure-mode-register).

Hard boundaries — agent may NEVER perform these autonomously:

1. Issue, deny, or revoke a permit, license, or approval. [ATTORNEY REVIEW]
2. Make a final agency determination. The agent produces a draft determination for human review.
3. Transmit a determination directly to an applicant without clerk review and approval.
4. Waive a statutory or regulatory requirement. [ATTORNEY REVIEW]
5. Modify a parcel record, permit record, or GIS layer.
6. Post a determination to the public agenda or meeting packet without board authorization.
7. Represent that a determination constitutes legal advice or a legal opinion. [ATTORNEY REVIEW]
8. Apply a rule where blocking: true in t7-rule-change-tracker (stale or changing rule).

Soft boundaries — agent requires HITL approval before crossing:

1. Producing a summary that could reasonably be interpreted as a legal conclusion beyond threshold-based classification.
2. Sending any communication to an external party (applicant, county agency, FDEP).

- 3. Citing a rule where verify_flag: true and last_confirmed is more than 12 months old.
- 4. Taking any action that crosses the irreversible_impact_boundary declared in the s1-operating-context-canvas for this agent.

5. Traceability Integration with s3-decision-traceability

This policy operationalizes s3-decision-traceability for the compliance context. The four-way decision classification applies as follows:

GROW decision kind	Compliance analogue	decision_origin
Retrieved data	Rule text retrieved from jurisdiction map; application field values from portal	compliance-determination (with high/medium source_confidence)
Tool output	GIS parcel lookup, threshold calculation	compliance-determination (high confidence if tool authoritative)
Model inference	Any synthesized interpretation of rule language	BLOCKED from final determination; must route to needs-review
User input	Expert reviewer's resolution of a needs-review item	human-override or escalation

The critical constraint: model inference may never produce a final compliant or non-compliant determination. Rule application must be reducible to retrieved-data or tool-output classification. Any determination that requires model inference — interpreting ambiguous statutory language, weighing competing policy goals — is by definition a needs-review that must cross the expert-review boundary. This is how the "not legal advice" constraint is enforced at the traceability layer rather than in a disclaimer paragraph.

6. Worked Example — Audit Trail, South Walton County Permit

Scenario. Application app-2026-0412 is evaluated and produces two needs-review determinations (see t7-compliance-workflow worked example). The engineer resolves both. The clerk reviews and transmits the determination summary. An applicant then submits a correction request claiming the parcel area was mis-entered.

Audit trail chain:

- 1. s2-audit-trail-schema record A-001 captures the initial run: inputs (application fields, parcel GIS), tool calls (GIS lookup, rule-map retrieval), decision trace (4 determination events, 2 with escalation).
- 2. s3-provenance-metadata-schema record P-001 holds the C9 records (4 per-rule), linked via audit_record_ref to A-001.
- 3. HITL event records H-001 and H-002 are emitted for the two expert-review escalations. Each carries correlation_id linking back to P-001.
- 4. Engineer resolution produces two override events (H-003, H-004) with decision_origin: human-override and rationale text.

5. Clerk approval produces event H-005 with decision_origin: human-override; applicant-facing summary transmitted.
6. Applicant correction request: clerk creates correction record P-002 with corrections[] pointing to P-001. Re-evaluation run produces new audit record A-002 and new provenance record P-003. Original records A-001, P-001 unchanged — append-only.
7. Revised determination summary transmitted to applicant by clerk.

The full trace satisfies s3-decision-traceability validation rules: every claim in the output has a resolving evidence_pointer, no model inference appears in the final determination, and every override has a rationale.

7. Policy Review Cadence

- Triggered. Any time an applicant formally invokes an appeal or a correction request that reveals a gap in this policy, an immediate policy review is convened.
- Annual. Full review with counsel of all [ATTORNEY REVIEW] sections against current Florida statutes and district operating resolutions. [ATTORNEY REVIEW]
- Version bump. Any change to the hard or soft authority-boundary lists is a MAJOR version bump to this policy and requires s1 owner sign-off per s1-hitl-review-policy review authority rules.