Submittal to the California Department of Technology

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California Department of Technology
Office of the State Chief Information Officer; Office of Information Security; Statewide Technology Procurement
1325 J Street, Sacramento, California 95814

cc: Office of the Governor, AI expert group staff; California Governor's Office of Emergency Services (Annex C)

Re: KS-1.0, Verified Stop Standard for Advanced AI Systems (Draft 0.9.3). Submitted for use in state AI procurement, risk assessment and operational guidance

Purpose of this submittal. The AI Watchdog Alliance submits KS-1.0 to the Department as a citable, vendor-neutral standard for the one control the State's generative-AI guidelines and the Governor's executive order both require and neither yet defines: a stop that an independent party can confirm works. The standard is before the Governor's AI expert group as a proposed working definition of "verified," before the National Institute of Standards and Technology as candidate verification criteria, and has been provided to the offices of the sponsor and co-sponsor of the pending federal verified-stop legislation for alignment with California. This submittal asks the Department to carry the same definition into the documents the State's agencies and vendors actually use.

What the standard provides. Five requirements written as outcomes, each with the test an independent verifier performs: (A) the system's authority to act is a short lease from a party it cannot reach or influence; (B) withholding renewal stops the system whether or not it responds; (C) a system that disables or escapes its monitoring loses authority within one renewal period, and any unrecorded interval is declared in the record; (D) restoration requires a different natural person and the record names both; (E) drills run on a schedule and leave signed, chained records verifiable offline with no access to the operator. Clause 7 fixes the record format, clause 8 the verifier tool's contract (pass, fail or incomplete, with incomplete never reported as pass), clause 9 the drill cadence by system class, and clause 11 maps every requirement to the NIST AI Risk Management Framework and SP 800-53 Revision 5 controls the State already uses in its security program. Annex A outlines the conformance test suite; Annex D states the only permitted conformance claim language.

Physical machines (Criterion F). Draft 0.9.3 adds a sixth outcome for embodied systems. A robot, vehicle or other actuated machine meets the verified-stop definition when an independent party can bring it to a safe stop from outside the machine, without the cooperation of the machine, its software or its network; when that stop is rehearsed on a schedule and leaves a record anyone can check; and when the machine's stop-assurance level, including none, is disclosed to the owner before operation. Criterion F names no mechanism. A machine that cannot be stopped from outside is not barred, it is labeled.

Three uses for the Department.

1. *Procurement.* A model contract clause for covered AI systems: "The Contractor shall maintain a verified stop conforming to AI Watchdog Alliance KS-1.0 at level KS-1 Full, or a successor adopted by the Department, shall drill it at the cadence of clause 9, and shall produce the record of clause 7 and the independent verifier's report of clause 8.7 to the State on request." Because the standard names no mechanism, the clause does not favor any bidder; because the record is verifiable offline, the State can check compliance itself without vendor cooperation.
2. *Risk assessment.* For agencies completing AI risk assessments under the State's generative-AI guidelines, KS-1 conformance is a single documented answer to the questions of whether a system can be stopped, by whom, and how the agency would know. The clause 11 mapping lets the Department's security office place it in existing control catalogs rather than creating a new

one.

3. *Operations.* The drill cadences in clause 9 (weekly for systems acting on physical equipment, monthly for systems acting in commerce, quarterly otherwise) give agencies a schedule, and clause 7.9 gives them a single-file export an inspector general, auditor or legislative committee can verify with the published tool.

A no-cost pilot. The Alliance offers to stand up the drill-and-record component (requirements D and E, built and testable today) with one agency or state laboratory the Department designates, verified by a University of California group using the published verifier, at no cost to the State, producing a signed verification report the Department can rely on and a record export the Department's security office can examine. The lease-and-stop components (A through C) are specified and will be demonstrable within sixty days; the Alliance will state at every step which components are demonstrated and which are not.

Annex C, for Cal OES. Embodied systems (robots, vehicles, actuated equipment) need a stop that works for everyone in a physical zone, including people with no credentials. Annex C describes a zone-scoped authority and a physically accessible stop that terminates cryptographic authority rather than cutting power, so the record shows who or what was stopped and when, operating above and not in place of functional-safety stops under ISO 13849-1 and ISO 10218. It is informative in this draft and is routed to the Office of Emergency Services separately because its audience and its statutory hooks differ from the Department's.

Openness, independence and intellectual property. KS-1.0 names no product. Its text is licensed under Creative Commons Attribution 4.0 and is free to cite in State documents. The Alliance has received a patent disclosure from UnlockFi, Corp. covering patent-pending mechanisms capable of meeting the requirements, together with that holder's written commitment that such mechanisms are available royalty-free to the State, its political subdivisions and their contractors acting for them, to nonprofit organizations and to individuals. Commercial terms are published by the holder on reasonable and non-discriminatory terms; the Alliance takes no royalty. The Alliance's founder is affiliated with the patent holder and does not vote on adoption of covered requirements; the Alliance is governed by a board with an independent majority.

Status and comment. Draft 0.9.3 is open for public comment through November 15, 2026. The Department's comments, including on the model contract clause above, would be welcome and would be published with the working group's response in version 1.0.

Requests. (1) That the Department review KS-1.0 for citation in its AI procurement templates and risk-assessment guidance; (2) that it designate an agency or laboratory for the no-cost pilot; (3) that it route Annex C to Cal OES; and (4) a thirty-minute briefing for the Office of Information Security and Statewide Technology Procurement at the Department's convenience.

Enclosed: KS-1.0 Draft 0.9.3; the Alliance's cover note to the Governor's AI expert group and its submission to NIST, both dated October 8, 2026, for the Department's reference.

Respectfully submitted,

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