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Governing the Invisible: Why Institutional Accountability Must Precede Sign Language AI Deployment

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Everyone is asking what sign language AI can do. Few are asking who is responsible when it fails. The governance gap deserves attention.

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The discourse surrounding sign language artificial intelligence has settled into a familiar rhythm. Announcements accumulate. Demonstrations proliferate. Platforms emerge. Each cycle reinforces a singular narrative: technological capability is advancing, communication barriers are eroding, and the future of accessibility is being engineered into existence. The language shifts incrementally across iterations, but the underlying argument remains structurally unchanged because innovation is arriving, and its arrival is imminent.

What this narrative consistently fails to interrogate is whether technological capability is, in fact, the central variable.

This omission is not incidental. Technological change commands public attention precisely because it is legible. The machine can be observed. The demonstration can be witnessed. The product can be evaluated. Governance, by contrast, operates largely beyond public view. Oversight frameworks do not draw conference audiences. Accountability mechanisms do not generate investor enthusiasm. Procurement standards rarely surface in mainstream discourse. Yet the historical record is unambigu-

ous: governance structures, or their absence, which routinely determine whether emerging technologies serve the public interest or merely serve themselves.

This dynamic acquires heightened significance in the domain of accessibility technology, where the moral and policy stakes are qualitatively different from those governing consumer innovation. A malfunctioning e-commerce platform produces inconvenience. A failing social media algorithm produces frustration. Accessibility failures produce something categorically distinct: the systematic exclusion of individuals from communication, participation, and the exercise of rights to which they are legally entitled. The consequences of inadequate accessibility infrastructure are not distributed randomly across populations. They concentrate precisely where dependence on that infrastructure is greatest.

It is within this context that the governance gap in sign language AI becomes not merely notable, but urgent.

Capability as a Necessary but Insufficient Condition

The dominant evaluative framework applied to sign language AI asks a consistent set of questions: Does the avatar produce recognizable signs? Does the translation model achieve acceptable accuracy? Can the system scale across deployment contexts? These are legitimate technical inquiries. They are also the questions societies have historically asked about nearly every emerging technology which are questions that address the threshold of functionality while leaving the architecture of responsibility entirely unexamined.

The more consequential set of questions concerns institutional capacity rather than system performance. Do deploying organizations possess the governance infrastructure to evaluate these systems rigorously before deployment? Do they maintain the oversight mechanisms necessary to monitor performance continuously after deployment? Do they bear and are capable of bearing meaningful accountability when systems fail in high-stakes environments?

These questions resist straightforward answers, in part because the field has invested relatively little energy in asking them.

The NIST Framework as Institutional Mirror

The National Institute of Standards and Technology's Artificial Intelligence Risk Management Framework is frequently characterized as technical guidance for managing AI systems. A careful reading suggests a more precise description: it is an institutional accountability framework that happens to concern artificial intelligence.

The framework's most persistent analytical move is to redirect attention away from the technology and toward the organization deploying it. Who has defined the governance structure? Who has mapped the risk landscape across relevant deployment contexts? Who has validated system performance against the needs of affected populations? Who remains accountable when outcomes diverge from intentions? The AI system itself recedes into the background. What emerges in its place is a comprehensive inquiry into institutional fitness.

Viewed through this lens, sign language AI deployment becomes a problem of public stewardship as much as a problem of technical performance. Consider a public agency evaluating an AI-based signing system for use in healthcare communication, educational services, or emergency management. The conventional evaluation asks whether the system works and what it costs. The NIST framework demands a substantially more rigorous line of inquiry. Were members of the Deaf community meaningfully involved in system evaluation? What failure modes emerge in high-stakes communicative contexts? What mechanisms exist for complaints, corrections, and system withdrawal? Who bears responsibility when communication breaks down at a consequential moment?

These are not engineering questions. They are governance questions and their answers are rarely found in vendor documentation.

Communication as Infrastructure

The governance imperative intensifies when one considers the function that communication technologies perform within public life. Information is not simply data in transit. Information structures decisions, mediates access to services, shapes the exercise of rights, and defines the conditions under which individuals participate in civic and institutional life. When artificial intelligence is positioned as an intermediary within communicative processes, the governance of that technology becomes inseparable from the governance of access itself.



This is not an abstract concern. Sign language AI is being deployed, or actively considered for deployment, in settings where communicative accuracy carries direct consequence: clinical environments where misunderstanding affects diagnosis and treatment; educational settings where inadequate translation compounds existing inequity; emergency contexts where communication failure can be life-threatening. In each of these settings, the question of whether an AI system can produce recognizable signs is secondary to the question of whether the institutions deploying that system have fulfilled their obligations of care, oversight, and accountability.

> Accessibility failures produce something categorically distinct: the systematic exclusion of individuals from communication, participation, and the exercise of rights to which they are legally entitled.

The conflation of capability with readiness and the assumption that a system that works in controlled demonstration conditions is therefore appropriate for deployment in consequential public contexts which represents perhaps the most significant conceptual failure in the current discourse.

The Structural Blind Spot

The field has invested considerable intellectual and financial capital in advancing what sign language AI can do. It has invested comparatively little in developing frameworks for how public institutions should evaluate, govern, and remain accountable for its use. This asymmetry is not unusual in the history of technology adoption. Governance has historically lagged capability by arriving after deployment rather than before it, responding to failures rather than anticipating them.

What distinguishes the current moment is the degree to which that pattern can be recognized and interrupted. The NIST framework, the growing literature on algorithmic accountability, and the sustained advocacy of Deaf communities and disability rights organizations collectively provide the conceptual and practical resources to approach sign language AI governance with the rigor the context demands. The resources exist. The question is whether deploying institutions will apply them before deployment

rather than in response to the failures that deployment without adequate governance tends to produce.

Responsibility as an Irreducible Human Obligation

The most important contribution of the NIST AI Risk Management Framework may not be its specific guidance on artificial intelligence. It may be its insistence that responsibility cannot be automated and that regardless of the sophistication of a deployed system, the obligations of governance, accountability, and public stewardship remain irreducibly human in character.

Artificial intelligence may transform the mechanisms through which accessibility services are delivered. It does not transfer, diminish, or eliminate the obligations of the institutions that deploy it. Those obligations persist independent of the technology's capabilities, independent of the vendor's assurances, and independent of the efficiency gains that automation may produce.

The governance question that nobody is asking about sign language AI is, in the end, the oldest question in public administration: who is responsible, and are they prepared to be?

The answer to that question will matter more than any capability benchmark the technology can achieve.

> **TIPS**
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> Know something about a sign language AI system that the public should know? Send it to tips@novaracg.com. Every tip is read by me and kept confidential. If you work in the UK, writing to us is not by itself a protected disclosure under the Public Interest Disclosure Act 1998, so before you share employer information, check your options with Protect (protect-advice.org.uk), the free whistleblowing advice line.

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