

## PUBLIC SPECIFICATION

# Vordan Accountability Framework

VAF v1.0 | May 2026

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The Vordan Accountability Framework is an independent assessment standard for evaluating the accountability posture of organizations developing, deploying, or governing technology systems. It is designed to answer one question with precision: when something goes wrong, can accountability be established, traced, and assigned?

This document is the public specification of the VAF. It defines the six framework components, the evidence requirements at each accountability tier, and the three assessment instruments through which the framework is applied. The scoring methodology and component weighting used to derive Gap Scores are proprietary to Vordan and not included in this specification.

*Organizations may use this specification to build toward accountability independently. A Gap Score requires a formal Vordan assessment.*

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## DOCTRINE

## Accountable by Design

Accountability is not a property of a compliance document. It is a property of a system and the organization behind it. A system is Accountable by Design when accountability can be established before an incident, not reconstructed after one. The VAF measures the distance between where an organization stands and that standard.

## CLOSING QUESTION

*Where in your organization right now is a tool running ahead of the rule designed to govern it? That gap is what we are here to map.*

## ASSESSMENT INSTRUMENTS

## Three Instruments. One Standard.

The VAF is applied through three formally defined instruments. Each produces a different class of finding. They are not interchangeable.

### VAF ASSESSMENT

The gold standard instrument. Requires direct organizational access including practitioner interviews, live evidence navigation, decision trail reconstruction, and signature gates at each component. Produces an official Gap Score on a points-out-of-100 distance metric. The Gap Score is a proprietary output of the VAF Assessment instrument only.

### VORDAN EXTERNAL POSTURE ASSESSMENT (VEPA)

Applied where direct organizational access is not available. Uses the VAF accountability logic and component structure against the public record: published documentation, regulatory filings, disclosed incidents, and public statements. Produces findings labeled explicitly as external posture findings, not Gap Scores. A VEPA finding is not equivalent to a VAF Assessment finding.

### AGENTIC ACCOUNTABILITY REPORT (AAR)

Applied specifically to organizations deploying autonomous AI systems and agentic workflows. Evaluates accountability posture against the Vordan Agentic Accountability Baseline, a specialized extension of the VAF for non-human decision chains, agent identity, and autonomous action traceability.

## TIER DEFINITIONS

## The Three Accountability Tiers

Each VAF component is evaluated against three tiers. An organization must satisfy the evidence requirements of a tier for that tier to count toward its assessment.

### TIER 1: EXISTS

The accountability structure, policy, or control is present in documented form.

### TIER 2: FUNCTIONS

The structure is demonstrably operational. Evidence of active use, not just existence, is required.

### TIER 3: ACTIVE

The structure is continuously maintained, tested, and updated. It governs behavior in practice, not just on paper.

## THE SIX COMPONENTS

# Vordan Accountability Framework

The VAF evaluates accountability across six components. Together they form a complete picture of whether an organization can answer for what its systems do.

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## 01 | ORIGIN

*Who is accountable, and is it declared?*

Origin evaluates whether accountability is named at the organizational level. A system or program with no declared owner has no one to answer for it. Origin does not assess competence — it assesses declaration.

### TIER 1: EXISTS

A named individual or role is assigned accountability for the system, program, or decision domain.

- + Documented ownership assignment
- + Named role in policy or governance document
- + Organizational chart reflecting accountability structure

### TIER 2: FUNCTIONS

The named owner actively exercises that accountability through documented decisions.

- + Evidence of owner-level decisions in the record
- + Meeting minutes, approval trails, or sign-off records
- + Named owner reachable and engaged in governance processes

### TIER 3: ACTIVE

Ownership is continuously reviewed, reassigned when roles change, and reflected in current documentation.

- + Succession or continuity plan for accountability roles
  - + Review cycle documented and evidenced
  - + No stale or unresolved ownership gaps in the record
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## 02 | VOICE

*Does the organization speak clearly and consistently about what it does and what it cannot do?*

Voice evaluates the accuracy and consistency of an organization's public and internal representations of its systems and capabilities. Overclaiming is a governance failure. Underdisclosing is an accountability failure.

### TIER 1: EXISTS

Public and internal statements about system capabilities are documented.

- + Published product or service descriptions
- + Internal documentation of system scope and limitations
- + Disclosed known limitations or caveats

### TIER 2: FUNCTIONS

Statements are reviewed for accuracy and updated when capabilities change.

- + Evidence of statement review process
- + Correction or update history when claims changed
- + Consistency between internal documentation and external claims

#### **TIER 3: ACTIVE**

A formal process governs what the organization claims and ensures claims are defensible under scrutiny.

- + Claims review policy in effect
- + Evidence that overclaims have been corrected proactively
- + Legal or compliance review of material capability statements

## **03 | TRACEABILITY**

*Can decisions and actions be independently verified after the fact?*

Traceability evaluates whether the organization maintains records sufficient to reconstruct what happened, who decided it, and on what basis. An audit trail that cannot survive scrutiny is not an audit trail.

#### **TIER 1: EXISTS**

Logs, records, or documentation exist for material decisions and system actions.

- + Audit log infrastructure in place
- + Decision records retained per documented policy
- + Change management records available

#### **TIER 2: FUNCTIONS**

Records are sufficient to reconstruct a decision chain without gaps.

- + Evidence of successful audit or investigation using existing records
- + Log completeness verified through testing or review
- + Records accessible to authorized parties within defined timeframes

#### **TIER 3: ACTIVE**

Records are tamper-evident, independently verifiable, and retained beyond the minimum required period.

- + Cryptographic or immutable audit trail in place
- + Third-party verification of record integrity
- + Retention policy reviewed and tested regularly

## **04 | TIMING**

*Does the organization act when the intelligence warrants it?*

Timing evaluates the velocity of the organization's governance response relative to the velocity of the threat or change it is governing. A policy updated annually in a threat environment that changes weekly is a timing gap.

#### **TIER 1: EXISTS**

A process exists for monitoring and responding to relevant changes in the threat or regulatory environment.

- + Threat or change monitoring process documented
- + Defined escalation thresholds

- + Review cadence established in policy

#### **TIER 2: FUNCTIONS**

The organization has demonstrated timely response to material changes or incidents.

- + Incident response timeline documented in prior events
- + Policy or control updates traceable to triggering events
- + No material gaps between identified threat and governance response

#### **TIER 3: ACTIVE**

Response velocity is measured, benchmarked, and continuously improved.

- + Mean time to governance response tracked
- + After-action reviews evidenced for material events
- + Response time targets documented and met

## **05 | RESPONSE**

*What happens when something goes wrong, and is that process documented before it is needed?*

Response evaluates whether the organization has a defined, tested, and published process for handling failures, incidents, and errors. A response process that only exists after the incident is not a response process.

#### **TIER 1: EXISTS**

An incident response or error correction process is documented.

- + Incident response plan in place
- + Correction and retraction policy documented
- + Defined notification obligations and timelines

#### **TIER 2: FUNCTIONS**

The process has been exercised and the record reflects actual use.

- + Evidence of prior incident response following the documented process
- + Tabletop exercises or drills documented
- + Lessons learned integrated into updated process

#### **TIER 3: ACTIVE**

The response process is tested regularly, publicly disclosed where applicable, and continuously refined.

- + Regular testing cadence documented and evidenced
- + Public disclosure of response process where subject to external accountability
- + Third-party review of response adequacy

## **06 | TRANSPARENCY**

*Is the organization's own governance posture visible to those with a legitimate interest in it?*

Transparency evaluates whether the organization makes its governance structure, decision-making processes, and accountability posture accessible to those who need to assess it. Transparency is not disclosure of everything. It is disclosure of what is necessary for legitimate accountability.

**TIER 1: EXISTS**

Core governance information is publicly or appropriately available.

- + Organizational structure disclosed
- + Ownership and accountability structure named
- + Relevant policies available to affected parties

**TIER 2: FUNCTIONS**

Governance information is current, accurate, and navigable by those who need it.

- + Policies reflect current practice, not historical state
- + Information accessible without unreasonable friction
- + Material changes disclosed in a timely manner

**TIER 3: ACTIVE**

Transparency is a stated organizational commitment with a defined process for maintaining it.

- + Transparency policy published
  - + Conflict-of-interest and independence declarations in place
  - + Third-party or independent verification of governance claims
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## METHODOLOGY NOTE

## What Is Public. What Is Not.

This specification publishes the VAF component definitions, tier criteria, and evidence requirements in full. Organizations may use this specification to assess their own accountability posture and build toward the Active tier on each component.

The Gap Score is a proprietary output of a formal Vordan assessment. The weighting algorithm, component aggregation methodology, and scoring instrument are not included in this specification. A Gap Score cannot be self-assigned. It requires direct organizational access, evidence review, and assessment by Vordan.

*This separation is intentional. The standard is open so organizations can build toward accountability without waiting for an assessment. The score is closed so it cannot be gamed into a checkbox exercise.*

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## SELF-ASSESSMENT GUIDANCE

## How to Use This Specification

For each of the six components, work through the three tiers in sequence. The question for each tier is not whether the structure exists in theory. It is whether you can produce evidence that it exists, functions, and is actively maintained.

**Start with Origin.**

Name the person accountable for each material system or decision domain. If you cannot name them, that is your first gap.

**Evidence is the unit of currency.**

For each tier, the question is not what you believe is true. It is what you can show. Unverifiable accountability is not accountability.

**Gaps are not failures.**

A gap is a distance measurement. Knowing the distance is the prerequisite for closing it. The VAF does not penalize organizations for finding gaps. It penalizes organizations that do not look.

**Timing matters most.**

A complete accountability posture that is six months out of date is a gap. Build review cycles into each component from the start.

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## ABOUT VORDAN

Vordan is an independent governance and accountability publication. Vordan publishes The Accountability Report and The Gap Alert, and applies the Vordan Accountability Framework through formal assessments, external posture reviews, and the Agentic Accountability Report. Vordan accepts no advertising and takes no commercial relationships with organizations it assesses.

vordan.co | reports.vordan.co | dominick@vordan.co  
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