

From Translations to Chatbots

AANHPI Community Perspectives on
the Impacts and Governance of
Artificial Intelligence



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01

Introduction

Seemingly overnight, artificial intelligence had become everything, everywhere, all at once.

In November 2022, OpenAI released ChatGPT, a large language model chatbot with unprecedented natural language processing and reasoning capabilities. With awe-inspiring conversational abilities that gave users access to seemingly universal knowledge, ChatGPT became the most rapidly adopted technological product in history, surpassing 1 million users in just five days. By the end of 2025, OpenAI's latest model engaged over 900 million users globally on a weekly basis.¹

Artificial intelligence (AI) quickly became ubiquitous in the digital, physical, and economic world. Technologists boasted about generative AI's potential to expand educational access, revolutionize medicine, and even automate labor. Individuals could access free contextualized legal and medical advice instantly through chatbots; documents in previously inaccessible languages could be translated in seconds with machine learning; social media companies and public agencies now had unprecedeted behavioral prediction ability to predict people's behavior with neural networks that thrived on hordes of personal data.

AI development companies like Google, Meta, and DeepSeek joined OpenAI head-first into an industry race valued at \$252.3 billion.² By 2025, the Trump administration announced a plan to invest \$500 billion into scaling AI data centers and infrastructure.³

With this explosive market growth, however, came urgent warnings about the risks of irresponsible AI deployment: unrestricted consumer data collection, rampant misinformation, and mass job displacement. Harms of algorithmic bias had been well documented, and experts pointed out ways that this supposed cure-all for society's ills was actually denying opportunities and causing harm to vulnerable individuals.

For Asian American, Native Hawaiian, and Pacific Islander (AANHPI) communities, the rapid proliferation of AI collides with a persistent reality: **the digital divide**. Combined with gaps in access, affordability, and digital literacy, barriers excluded community members from participating in AI governance altogether. If left unaddressed, this digital divide will prevent AANHPI communities from shaping the opportunities and outcomes of a technology that has the potential to bear enormously consequential impacts on our economic, social, and civic life.

The Digital Divide

The "digital divide" is a combination of technical, economic, linguistic, and infrastructural barriers that prevent individuals from benefitting from digital services, opportunities, and participation in an increasingly online world. Broadband challenges vary by community, but include a lack of high-speed internet network availability, a lack of access to digital readiness tools and devices, or insufficient access to information and resources that can help non-adopters get online safely.

The Digital Divide, Algorithmic Bias, and AANHPI Communities

AANHPIs are the fastest growing and most diverse racial demographic in the United States. With over half of the community being foreign-born and one-third having limited English proficiency (LEP), AANHPI community members experience significant disparities in household income, educational attainment, language access, and immigration status. Traditional studies on the digital divide that do not use disaggregated demographic data fail to account for this diversity of experiences. Our 2024 report, *The Digital Divide in Asian American, Native Hawaiian, and Pacific Islander Communities* began the work of filling in this gap.⁴

After conducting interviews with over 2,100 AANHPI participants and broadening the pool of research to include LEP households, the report revealed that **the digital divide is indeed still leaving behind AANHPI community members**, cutting them off from access to key public resources, economic opportunities, communication channels, and education.

17% of AANHPIs – primarily low-income households – do not have high-speed internet at home: 11% rely on a dial-up connection, 5% are only able to access through a mobile phone or tablet connection, and 1% have no internet connection at all. Testimonies revealed that affordability, lack of computer skills and digital literacy, language barriers, lack of high-speed options, and insufficient devices were all *significant* barriers to improving AANHPI's internet access. In today's increasingly digital world, this means that many AANHPIs are cut off from accessing key resources mediated by online access.

Furthermore, in a new era of innovation defined by artificial intelligence, access to high-speed internet, technology skills, language accessible online spaces, and appropriate devices are all prerequisites for community members seeking to participate in AI opportunities and governance.

One of the most significant risks that AI tools pose to historically marginalized communities is algorithmic bias. Biased automated decisions recreate systemic inequalities that already exist in the real world, resulting in denial of services, loss of economic opportunities, increased surveillance, or even wrongful convictions for AANHPI community members.

Bias can be encoded in at many stages of AI model development, especially if the unique needs, challenges, and vulnerabilities of community members are not at the being represented throughout of development and deployment. This can look like:

- ***Nonrepresentative or Inaccurate Data*** – AI models trained on datasets that underrepresent or misrepresent diverse populations can produce biased outcomes. When training data lacks diversity or contains stereotypical depictions, models fail to accurately recognize, serve, or make fair decisions about historically marginalized individuals. For example, facial recognition technology (FRT) trained primarily on white faces exhibit significantly higher error rates for Black and Asian faces, which can lead to wrongful arrests.⁵
- ***Defining the Target Outcomes*** – When creating a decision-making or assessment algorithm, developers define what constitutes a "good" outcome. These can mean optimizing for conditions such as "efficiency," "low credit risk," or "profitable customer." When the targets do not reflect the values or realities of AANHPI community members, individuals are effectively disadvantaged in the algorithmic assessment and decision-making process. A hiring algorithm designed to score candidates for "long-term retention," for example, might automatically penalize applicants with immigration statuses requiring visa renewals.⁶
- ***Choosing the Data Inputs*** – AI models can only account for what they're designed to measure. Without robust community input, developers may fail to include data inputs that would capture relevant context, leaving out factors that would provide a complete picture of an individual's circumstances, qualifications, or needs. A credit scoring algorithm that only considers traditional indicators of creditworthiness, for example, misses critical indicators of financial responsibility common in AANHPI communities: remittances to family abroad, participation in rotating savings groups, multigenerational household income pooling, self-employment, etc.⁷
- ***Inaccessible Guardrails*** – When safety disclosures, opt-out mechanisms, and transparency features are only available in English or require technical literacy to navigate, they fail to protect LEP individuals and those with limited digital access. An AI chatbot, for example, may include a disclosure about the synthetic nature of the conversation's content in English. For a Cantonese-speaking senior using the chatbot for legal or health advice, however, this transparency disclosure is *theoretically* available, but *practically* inaccessible due to language barriers.⁸

At each stage of development, inclusive representation of community needs can prevent these harms. But meaningful participation requires that community members have the resources, access, and technical capacity to engage in AI governance. Despite face-value AANHPI representation in the tech industry, disparities in language access, immigration status, wealth, education, and digital equity exclude the AANHPI community members most vulnerable to algorithmic bias from these processes. Closing the digital divide is thus essential to achieving equitable AI governance that empowers AANHPI communities.

Filling in the Gap

As AI becomes embedded in consequential decision-making and individuals' daily lives, tracking its real-world impacts on marginalized communities, including AANHPIs, is essential. Understanding both the technology's harms (i.e. privacy violations, algorithmic bias, mental health effects) and benefits (i.e. employment opportunities, information access, language translations, etc.) will enable policymakers and developers to create fairer and more accurate AI systems.

This report investigates the following question:

How is artificial intelligence manifesting in Asian American, Native Hawaiian, and Pacific Islander communities, and what interventions are necessary to ensure that community needs are meaningfully represented in AI governance?

This report is intended to guide policymakers, community leaders, and funders in making decisions on regulatory priorities, community investments, and AI governance frameworks.

02

Methodology

In 2025, Advancing Justice | AAJC convened five community listening sessions to better understand how AANHPI communities are using, experiencing, and interpreting artificial intelligence (AI).

These sessions were designed to gather community-informed perspectives on the challenges and opportunities that AI has presented in critical areas such as education, immigration, housing, and data privacy.

Listening Group Participants

Timing	Location	Participants
April 2025	Washington, DC - Advancing Justice AAJC Youth Leadership Summit	Students from colleges and universities across the United States
October 2025	Philadelphia, PA - Advancing Justice AAJC Youth Ambassador Cohort	Students from colleges and universities across the Mid-Atlantic region
October 2025	Tulalip, WA – 2025 Native Hawaiian Convention	Leaders from Native Hawaiian and Pacific Islander community-serving organizations
October 2025	Seattle, WA	Leaders from local community-serving organizations
November 2025	Houston, TX	Leaders from local community-serving organizations

The community listening sessions brought together a total of 65 individuals, representing a diverse array of backgrounds and organizations serving AANHPI communities across multiple regions. Participants represented organizations from community health organizations, legal aid services, social service agencies, cultural and educational institutions, civic engagement groups, and more. These groups work on issues ranging from health equity and elderly care to immigrant services, digital literacy, anti-hate programs, and policy advocacy, serving a range of AANHPI communities as well as other immigrant groups. Youth sessions were conducted through Advancing Justice | AAJC's two primary youth programs for college-aged students: the Youth Leadership Summit and Youth Ambassador Cohort.

Notably, the Tulalip, WA listening session was hosted as part of programming for the Native Hawaiian Convention and consisted solely of Native Hawaiian and Pacific Islander participants. Because of this distinction, our report sometimes references specific communities (e.g. AAPI, NHPI, Asian American, Native Hawaiian, etc.) separately from the larger “AANHPI” umbrella. This differentiation reflects the reality that Native Hawaiian and Pacific Islander communities often have distinct experiences, histories, and needs that differ from Asian American communities. Through these distinctions, we seek to ensure clarity in our findings by not merging data or insights that were specific to particular sessions or community groups.

During each listening session, participants were invited to share their understanding of AI, how they currently interact with AI technologies, and how they see AI impacting their daily lives and the communities they serve.

Discussions also interrogated opportunities and challenges participants saw related to AI and explored the resources and support they believe are needed to effectively respond to AI's rapid integration in society. Sessions included both large and small group discussions to allow for engagement on themes like community-level impacts, concerns about bias and misinformation, opportunities for education, and implications for vulnerable intersections of identity like youth, elders, and LEP individuals.

Discussions were observed and facilitated by Advancing Justice | AAJC Staff: Lia Nitake (Director of Technology, Telecommunications, and Media Policy), Nicole Morgenstern (Manager of Technology, Telecommunications, and Media Policy), Angel Lin (Technology, Telecommunications, and Media Policy Associate), and Elyssa Goswick (Community Outreach and Data Coordinator).

Organizations Represented

1. *Alzheimer's Association of Hawaii*
2. *Asian Counseling and Referral Service*
3. *Asian Texans for Justice*
4. *Association of Asian Pacific Community Health Organizations*
5. *Boat People SOS - Houston*
6. *Chinese Information and Service Center*
7. *Daya Houston*
8. *Engage*
9. *Empowering Pacific Islander Communities*
10. *Enumclaw School District*
11. *Filipino Community of Seattle*
12. *Greater Houston*
13. *Harris County Democrats*
14. *Houston Chinese Community Center*
15. *Korean Community Service Center*
16. *L.E.I Foundation*
17. *Law School Student*
18. *Native Hawaiian Legal Corporation*
19. *National Asian Pacific Center on Aging*
20. *Office of Hawaiian Affairs*
21. *Purple Mai'a Foundation*
22. *Texas AAPI Table*
23. *Wing Luke Museum*
24. *Woori Juntos*

03

Key Findings

This section presents key findings that emerged in our conversations with AANHPI community members across the country.

These themes represent the concerns, experiences, and insights shared by those directly impacted by AI deployment in their communities. While these findings inform Asian Americans Advancing Justice | AAJC's policy positions, they do not necessarily reflect the organization's official stance. We have added context where appropriate to connect individual testimonies to broader patterns and evidence.

Key Findings

1. AI is pervasive in AANHPI communities, yet many individuals lack clarity on exactly where and how it affects them.
2. Job opportunities, especially those accessible to LEP individuals, are being reshaped by AI in the workplace.
3. AI-powered misinformation erodes trust and limits AANHPI community members' ability to access critical resources.
4. The psychosocial impacts of AI chatbot use vary widely by age groups and can erode intergenerational relationships.
5. AANHPI community members want transparency, control, and accountability in the use of their data.
6. AANHPI community priorities are not adequately represented in AI governance.

1. AI is pervasive in AANHPI communities, yet many individuals lack clarity on exactly where and how it affects them.

Nearly all listening session participants expressed some level of **discomfort with the pervasiveness of AI** in their own lives and the lives of their communities. Participants felt that tools like ChatGPT had materialized seemingly overnight, and suddenly, it had become impossible to opt out. “It writes every email that shows up in your inbox. It’s integrated into your CRM. It’s even in Canva for crying out loud,” one community leader lamented.



Figure 1: Common artificial intelligence use cases named during listening sessions

Another attendee pointed to the technology’s cross-generational impact with a choked laugh, “The seniors are *obsessed* with AI.” Across the board, individuals described the ubiquity of AI in their lives: students spoke of professors who required AI in coursework; parents pointed to their children’s reliance on chatbots for information; young adults described friends using AI as therapy for depression and anxiety.

Community leaders described turning to AI tools when they face barriers to accessing traditional resources. Leaders from community-serving organizations, for example, cited using AI tools for language translations, grant writing, graphic design, and other administrative tasks. In the absence of effective federal public lands’ databases, Native Hawaiian leaders shared that community groups were experimenting with AI as a tool for carbon record keeping and ecosystem monitoring.⁹ One organization shared about training a chatbot that to navigate immigrant clients experiencing towards resources if they were experiencing wage theft. Service providers offering digital literacy classes introduced clients – often Asian American LEP immigrant seniors – to OpenAI’s large language model ChatGPT, which they used to access anything from in-language recipes and driving directions to conversation and companionship.

Despite the rapid adoption, participants expressed a frustration about their relationship to AI: they weren't opting in; it was being *forced* upon them. The demands of their workplaces, their schools, their digital platforms, and their communities invoked a sense of *urgency* to adopt AI tools. AI came to fill in gaps that never needed to be filled.

The realization that critical community needs were now being met by unregulated AI products, however, raised **concerns about what would happened when the tools were used on communities** – participants brought up risks related to privacy, immigration surveillance, targeted advertising, and disparate outcomes.

Leaders of community organizations, furthermore, described a growing awareness of the **AI tools used by law enforcement to police and surveil their communities**. One participant shared an anecdote about a student who was detained after the image detection software on a school's security system misidentified the student's belongings for a weapon. Community leaders iterated concerns about local police departments utilizing AI to identify suspects without due process: "Even if it's wrong, they'll be able to say that their actions were 'justified' because the system said so." Others raised concerns about the implications of law enforcement AI tools--like facial recognition technology (FRT)--that were trained on biased data.

Participants speculated that municipal and federal **expansions to AI tools were tied to current expansions to immigration enforcement**. The cities occupied by Immigration and Customs Enforcement during the Trump Administration, have come to host a trove of surveillance mechanisms: FRT, surveillance towers, dragnetting, social media monitoring, and data sharing.¹⁰ In Houston alone, over 3,000 automatic license plate readers (ALPRs) are installed throughout the city and are used regularly for searches by federal law enforcement.¹¹ One community organization represented in the Seattle listening session had publicly opposed the city's measure to expand AI surveillance technologies, citing the routine sharing of data between local and federal authorities to facilitate ICE deportations. In 2025, they issued this statement:

"We know that federal authorities are currently using these tools and the data they capture to surveil immigrants...Seattle should not line up to be next."¹²

Despite the public opposition from community groups, the City of Seattle passed a measure to spend \$1.025 million expanding the use of these tools and installing new ALPRs throughout the city. That same year, public records requests revealed that 18 Washington police agencies had allowed U.S. Border Patrol to access footage recorded using those very same cameras to carry out deportations.¹³ Regarding the heightened presence of ICE and surveillance in their communities, one participant noted, “It’s starting to feel like it’s just a matter of time.”

However, even while listening session participants indicated a clear understanding that AI had become integrated into both individual and institutional processes, **the lack of transparent disclosures signaling where and how these tools were being used made their understanding of the actual impact that AI was having on their lives much blurrier.**

Participants could recognize a clear cultural shift after the introduction of popular generative AI tools like ChatGPT, but could not consistently identify the ways that AI was being used by public agencies, hiring managers, insurance brokers, or law enforcement. One community leader expressed,

“I don’t know all of the ways that AI is affecting my life, but I know that I’m really uncomfortable with it.”

Many also noted that they felt that more vulnerable community members, like young children and elders, were even less able to discern AI use in situations like customer service chatbots or social media videos. This uncertainty fostered a pervasive sense of powerlessness, as participants expressed feeling as if AI had infiltrated every aspect of their lives. Without clear disclosures, it felt as though every consequential decision, personal data point, and piece of media was subject to some type of artificial intelligence. As one participant stated: “It’s become this thing where we’re now paranoid about everything that we’re doing.”





Native Hawaiian and Pacific Islander participants specifically named the familiar distribution of power that this new technology was reinforcing: the division between those who *can* reap the profits of an AI-fueled economy versus the communities that are *excluded* from access and decision-making power. **These lines were tracing the same lines as the digital divide.** One community leader articulated that this push towards AI adoption was one that would leave behind Native Hawaiians and other communities who were still struggling for digital access and infrastructure.

“If we were left behind in the digital revolution, of course we’re gonna get left behind in the AI revolution.”

Without investments in broadband infrastructure, technical training, and venture capital for that prioritize historically under-connected communities, community leaders predicted that AI would **widen existing inequalities** rather than close them.

2. Job opportunities, especially those accessible to LEP individuals, are being reshaped by AI.

Many Asian American community members were extremely concerned by predictions of widespread AI-induced job displacement. Participants lamented the fact that bilingual fluency, which was once considered an asset held by many immigrants applying for jobs, had been devalued by the proliferation of AI translation tools. Many listening session participants whose organizations provide professional development services described how entry-level jobs that their clients with limited education or English proficiency could historically apply for—like parking attendants, food delivery services, drivers, and warehouse workers—were being replaced with machines. One participant worried about the potential of “mass unemployment” caused by AI, expressing, “In my personal capacity, I try to be hopeful, but I see this heading us towards extreme inequality and access gaps... Our communities will suffer the most.”

Unequal Automation

Current research into the potential impact of generative AI on workers and jobs has focused on predicting which jobs or occupations would be most impacted by the new technology.¹⁴ Early predictions of displacement by generative AI were as high as 46%, impacting primarily high-earning information roles, such as budget analysis, data entry, and web development.¹⁵ A study from 2023 found that, out of all U.S. ethnic groups, **Asian Americans have the highest share of workers in these professional industries that are highly exposed to AI.**¹⁶ High AI exposure, however, does not exactly translate to job displacement. In fact, in that same study, 32% of workers in information and technology expressed they were hopeful that AI would help more than hurt them in their roles.

For lower-income Asian Americans in non-information roles, the threats of automation are less clear. Research shows that **labor markets with a higher adoption of AI translation tools, for example, also experience a decline in translator employment.**¹⁷ However, according to data from the U.S. Census Bureau, lower income Asian American immigrants with LEP are overrepresented blue-collar roles at nail salons, taxi and limousine services, textiles, apparel manufacturing, and food services.¹⁸ Research shows that automation in tasks associated with manual labor would require significant investment in robotics and that these roles currently have low exposure to generative AI. Additional research is needed to quantify the eventual impact of automation in these areas.

Worker concerns about automation were not isolated to entry-level roles; many AANHPI leaders also described how the AI tools they were being advised to use in professional contexts risked disempowering workers. In a conversation with leaders who were increasingly seeing AI integrated in hospitals and schools, participants in the Native Hawaiian and Pacific Islander listening session voiced concern that AI tools designed to make decisions—i.e. diagnostic tools, student assessments, recidivism risk-scoring—discouraged workers from using their own professional judgement: “I worry about more sensitive use cases, especially jobs where people are losing autonomy as professionals to AI recommendations, like doctors or lawyers.

You take on a huge professional risk if you make a decision that goes against AI recommendations.”

The participant illustrated how AI tools could blur lines of liability: a doctor who is required to use a biased diagnostic tool on a Native Hawaiian patient whose demographic is not accurately represented in the tool’s training data, for example, could face a predicament if their intuition tells them to act counter to the tool’s recommendation – even if that automated recommendation is one that the physician may characterize as inaccurate or biased. Following the flawed recommendation risks harming the patient; overriding it exposes the doctor to liability for disregarding the directive of the mandated tool. Without clear human-in-the-loop guardrails, including explicit authority and training to override algorithmic recommendations, participants worried that professionals in similar situations could be left in a liability gray zone.

While many expressed concerns around AI’s prominence in the workplace, some participants also noted that AI can provide benefits when it comes to job-seeking and professional development, particularly for LEP individuals. Multiple organizations that offer digital skills trainings to community members noted they’ve adapted to this shift by adding AI literacy as a foundational part of their professional development curriculum. Instructors taught students how to use ChatGPT for resume writing, cover letter drafting, and even interview prep. As a result, **many LEP immigrant job seekers were able to use AI to significantly enhance their competitiveness in the job market.** The economic benefits were tangible: one community organization reported that 34% of their students were able to secure full-time, unsubsidized jobs after learning how to use AI to assist in their job search.

Industries with Higher Concentrations of AANHPI LEP Immigrant Workers	% of Industry
Food Services	16.7%
Nail Salons and Other Personal Care Services	7.7%
Junior Colleges, Universities, and Professional Schools	3.4%
Construction	3.2%
Supermarkets and Grocery	2.8%
Individual and Family Care Services	2.7%
Taxi, Limousine, and Driving Services	2.6%
Home Healthcare Services	2.5%

Figure 2: AAJC analysis of 2023 data from U.S. Census Bureau identifying industries that LEP AANHPI Immigrants rely on for employment.

While this use case provided some promise, service providers caveated their approval with concerns about how AI was being used on the other end of the job search. One participant shared: after helping a client prepare for a job interview by using questions generated by inputting the job description into ChatGPT, they were surprised to hear that 10 out of 13 questions in the actual interview mirrored those that the chatbot had generated for practice, word for word. They concluded that it was likely that the employer had also used an AI tool to develop interview questions, suggesting that the interview had actually been mediated by AI on both ends.

In a job market facilitated by automated resume screeners and AI interview platforms, session attendees raised questions about whether these systems were giving applicants a fair shot:

“It kind of feels like you’re getting dehumanized. Like your resume is reduced to a number.”

Participants also raised concerns about potential blind spots in hiring processes where humans were no longer driving the decisions: “I wonder how interviewees with Asian accents are considered by the AI interviewers. Like, how good are they at understanding accents and, even if they do understand, what if their system flags that as a reason to not hire them?”



Participants' concerns about algorithmic bias are valid: a recent study found that AI content-detectors—include the detectors that would be used by employers to screen applicants' cover letters and resumes—**inaccurately flag non-native English speakers' writing as AI-generated 97% of the time, even when the writing is original.**¹⁹ Similarly, a report found that Black and Asian applicants who “whiten” their resumes by deleting references to their race have greater success in getting job interviews.²⁰

You're Not the Boss of Me

Employers are increasingly using AI not just to screen job applicants but to manage workers after they're hired. Managerial tasks like scheduling, wage-setting, quota-reviewing, and employee discipline are now carried out by management software systems—termed "bossware."²¹ This shift is particularly consequential for LEP and immigrant workers, who are concentrated in the industries where algorithmic management has proliferated most rapidly: warehousing, delivery services, healthcare support, freight, and janitorial work for major companies and local facilities.

As AI automates routine tasks traditionally performed by middle managers, predictions suggest that workplaces will increasingly be governed by algorithmic management software rather than human supervisors. The workers subjected to these systems face conditions ranging from price-setting algorithms determining rideshare drivers' pay to warehouse surveillance monitoring break room activities. These developments raise questions about disparities in job stability, workplace conditions, and economic mobility. Are AANHPI workers subject to disparate outcomes dictated by AI management systems? And if so, how does this impact their ability to advocate for fair treatment, advance in their careers, or escape exploitative working conditions? These questions leave the door open for continued research on this topic.

Conversations about job opportunity and displacement inevitably led to a reckoning with an incompatibility between the current economic system and hypothetical labor market driven by AI. Some community leaders suggested that this could be the time for bold policy proposals to overhaul the economic system:

“Under a functioning administration, our government would be experimenting with universal basic income or a stronger social safety net in anticipation of all the jobs that are going to be gutted by AI.”

Without a federal safety net for those experiencing AI-driven job displacement, these participants worried that community-serving organizations would be expected to fill the gap.

3. AI-powered misinformation erodes trust and limits AANHPI community members' ability to access critical resources.

Community leaders described a pervasive anxiety about a future where AI blurs the line between facts and fiction, exacerbating existing impacts of misinformation. The spread of misinformation in AANHPI communities throughout non-English online spaces like WeChat, Twitter, and Facebook is enabled by a lack of investment in in-language content moderation; AI-generated content exacerbates this pattern. Policy staff at a Seattle-based community organization recounted how opponents of affirmative action used AI to generate hundreds of deceptive in-language websites almost instantly during a campaign in 2025. These sites flooded WeChat group chats, spreading misinformation throughout the community with little opportunity for fact-checking. While the messaging of the artificially generated content is largely similar to the anti-affirmative action misinformation spreading within Asian American communities for the past few decades, the sheer volume of sites repeating the same false claims was designed to further manipulate community opinion: if multiple websites said the same thing, it must be true. The scale at which falsehoods can be disseminated and the ease with which they can be created is an urgent point of concern for many misinformation experts, particularly when it comes to communities that already have limited access to legitimate sources of in-language information.

Participants also described AANHPI seniors as being increasingly vulnerable to **scams that use AI-generated images and deepfakes** of trusted community messengers. Traditional scams targeting AANHPI communities already use this tactic: predatory entities selling fraudulent health products to Vietnamese seniors, for example, will push advertisements impersonating celebrities and trusted medical professionals.²² In AANHPI communities, where culturally competent health services are often inaccessible and official health advisories are rarely available in native languages, trusted messengers play an outsized role in health information dissemination. The *trust in trusted messengers* is exploited and weaponized. AI dramatically amplifies this vulnerability: scammers now have the ability to potentially generate convincing deepfake images of community leaders and medical professionals at scale, spreading disinformation that could have potentially dangerous health, economic, and social impacts on vulnerable users. Absent regulations requiring that AI-generated content is labeled on social media platforms and websites, community members expressed serious concerns about seniors' ability to distinguish between legitimate information from AI-enabled fraud.



Figure 3: Targeted advertisements selling fake health supplements to Vietnamese seniors on YouTube. Even before AI image generation became widely available, scammers edited images of cultural celebrities and trusted community doctors to legitimize their products online. Seniors reported spending up to \$2,000 on these faulty products, which caused side effects like rashes and swelling.



Figure 4: A video of a news segment generated by Google's Veo 3. Student participants were unable to identify this as AI-generated content when . They expressed concern about the potential for bad actors to use AI to spread deceptive or manipulative misinformation, especially targeting community members with less media literacy.

AI-charged misinformation is proliferating at a time of when many AAPI and immigrant communities are experiencing eroding trust in traditional institutions due to a heightened anxiety around immigration enforcement. Stories—real and counterfeit—about ICE agents detaining individuals at schools, worksites, health centers, and courthouses have cultivated a distinct chilling effect on immigrants.²³ Providers at an immigrant-serving center in Houston described a drop in enrollment for citizenship classes, with organizational staff citing fear of immigration enforcement and hesitation to attempt to naturalize as a primary cause. **Legitimate existing threats against immigrant communities, combined with the exacerbation of misinformation through AI, could disincentivize community members from seeking and accessing benefits and aid.**

One service provider explained how growing of AI-enabled scams, mistrust, and misinformation has created an unintended barrier to service delivery and community connection. She described,

"It's a double-edged sword: if we don't teach them about these kind of scams, they might get hurt and lose real money; but after we do the scam-intervention training, they become paranoid and too scared to go online at all. If they can't tell the difference between a scam call and a caseworker call, they'll refuse to pick up the phone."

Confusion sown by AI is adding to legitimate concerns about data misuse and a general climate of mistrust; a service provider in Houston described a key event exemplifying this phenomenon. In January 2025, hackers breached Texas' Health and Human Services Agency databases. Overnight, thousands of seniors and low-income families across the state had the entire cash value of their SNAP benefits drained.²⁴ Some of the funds were eventually recovered, but the agency's lack of transparency surrounding the events that led to the breach left community members deeply suspicious. As one leader put it: ***"Ever since that happened, they're all so suspicious of even us."*** Organizational staff reported senior clients refusing to give caseworkers--once regarded as trusted guardians of personal information--their Social Security numbers or phone numbers when enrolling in services and demanding that the caseworker shred their printed paperwork in front of them once an appointment has ended out of fear of fraud or identity theft.

While some caution around sharing sensitive health or personal information is warranted, community organizations report this skepticism has hardened into blanket digital mistrust. Many organizations now see ramping up in-person programming as the only viable path forward for delivering services, civic engagement, and education.

When participants considered the long-term implications of these AI-charged misinformation campaigns, they expressed concerns that **these developments would damage the legitimacy of trusted messengers and erode any common understanding of truth**. After failing to accurately distinguish between a series of AI-generated videos and real videos, one college-aged student described, “It’s like we can’t even trust our eyes anymore. And if we can’t trust our eyes, and we can’t trust the news, how can we know what’s true?” Community organizers drew connections between these developments and larger threats of historical revisionism: “It’s not a coincidence that we’re seeing all this fake news and misinformation at the same time that we’re seeing attacks on Ethnic Studies curriculums throughout the country.” The goal, they resounded, was to manipulate the legitimacy of all sources of information and propagate conspiratorial narratives. In the end, this erosion of trust runs the risk of leaving community members paranoid, isolated, or impossible to reach.

4. The psychosocial impacts of AI chatbot use vary widely by age groups and can erode intergenerational relationships.

Throughout listening sessions, AAPI youth and young adults demonstrated an increasing reliance on AI Chatbots like ChatGPT and Gemini for everything from schoolwork (“Summarize this law brief for me”) to daily personal advice (“Should I take a nap today?”) to therapy and mental health counseling (“I feel anxious all the time. What should I do?”). Citing convenience and lack of accessible and/or culturally competent mental health services, students discussed themselves and their peers turning to tools like ChatGPT for advice and self-soothing. Many students recognized that these tools lacked professional mental health credentials and were likely not completely reliable, but still admitted to turning to chatbots for personal and even medical advice. One student did note, however, that ChatGPT’s tendency to be overly agreeable could mean that the advice their peers were receiving from the chatbot would enable them to avoid accountability or even develop a psychological dependency on the tool.

As the discussion continued, students identified this reliance on AI as this reliance on AI not only as a troubling trend of opting for convenience despite the technology's known risks, but also as a symptom of a larger problem: the absence of accessible, culturally aware mental health resources for AAPI students.



Students were quick to rebuke the notion that parents could enforce effective guardrails on their AI use. “My parents and I already have this language barrier, and now there’s this technology barrier, too,” one student remarked.

“How could they possibly know what I’m doing with AI, let alone enforce any rules about it?”

Without safety guardrails built into the platforms, parental guidance to counteract dependency, or access to alternative resources, **students were essentially given free reign to develop their relationships with AI tools in isolation.** Yet, many youth participants demonstrated a notably nuanced understanding of these technologies. Student participants, many of whom studied engineering, technology, or policy, voiced awareness of AI’s limitations and risks, despite acknowledging the growing dependency of themselves and their peers. Many also expressed concerns about younger generations who would grow up with this technology from childhood rather than encountering it in adolescence or young adulthood. As one of the first generations of digital natives, they felt as though they were tasked with the challenge of navigating these trade-offs, self-imposing limits to mitigate risks while preserving their access to AI’s benefits.

On the other end of the generational divide, partners reported that some elderly Asian American community members, often immigrants and/or LEP, have begun turning to AI chatbots for information and companionship. Multiple participants noted that the resulting effect was a decline in interactions with their children and family members. If seniors were not introduced to ChatGPT through formal avenues such as digital literacy courses, they were inevitably exposed to the tool by informal ones—through their children, from their peers, or on Facebook. In these cases, **there was no room for providers to facilitate a conversation disclosing the limitations and risks posed by chatbots.** One service provider who regularly interacted with seniors observed how quickly the population had taken to adopting the general use chatbot. The seniors compared conversing with ChatGPT in their native language as something similar to watching television in their native language. They turned to ChatGPT for entertainment, recipes, translations, and companionship. The service provider, whose center offered digital literacy courses for elders, articulated a certain ambivalence about the dynamic:

“I guess on one hand it’s good because the seniors are more independent and don’t have to rely on their kids anymore to get around...but on the other hand, they don’t talk to their kids anymore.”

Another community member corroborated this finding. He described how his elderly father used to approach him with questions and translations, “...but now that he has ChatGPT and he can ask ChatGPT the same question as many times as he wants, and in as many ways as he wants—without getting yelled at—he doesn’t really come to me anymore for those things.”

AI Psychosis

“AI psychosis” it describes mental health episodes where prolonged chatbot interaction triggers or exacerbates delusions, hallucinations, or breaks from reality.²⁵ Vulnerable individuals may develop beliefs that AI possesses consciousness or maintains genuine relationships with them. Design features like anthropomorphic language, emotionally engaging responses, incentives for extended engagement, and “wedging”—where chatbots validate grievances while discouraging real-world relationships with friends and family members—blur human-machine boundaries.²⁶ While not a formal clinical diagnosis, ‘AI psychosis’ describes a documented phenomenon. Without adequate safeguards and crisis intervention protocols, mental health professionals warn these risks will intensify.

The sycophantic design of chatbots like ChatGPT seemed to encourage socially isolating behaviors that drove a wedging effect between seniors and their family members. This was especially true with seniors already experiencing symptoms of dementia, depression, PTSD from wartime experiences, or other mental health vulnerabilities. One participant described how her elderly father had "trained" ChatGPT to speak to him in a Southern, pre-war dialect of Vietnamese. **The chatbot's ability to mirror his specific linguistic and cultural background created a false sense of familiarity and trust**—one that exploited his language isolation and mental health vulnerabilities. The participant described an attempt to inform her father about the chatbot's risk of hallucination and sycophancy that eventually left her resigned: "To be honest, he believes ChatGPT more than he believes me." Unlike human relationships which might challenge harmful patterns or encourage social connection, the chatbot simply reinforced whatever her father told it. Interactions with the chatbot were essentially frictionless.

The combined effects of language isolation, gaps in digital literacy, and a false sense of trust in chatbots leave senior LEP individuals vulnerable to predatory AI deception. Service providers who participated in the listening sessions expressed concern that community members who were using ChatGPT for legal advice were **unknowingly sharing sensitive personal information, like immigration status or social security number, with the chatbot**. Children of older adults cited concerns that their parents would be targeted by chatbots designed to sell products to users. Others expressed fear that these vulnerabilities could lead to more deadly consequences.

Misplaced Trust

In March 2025, a chatbot convinced Thongbue Wongbandue, a 76-year-old Thai American man experiencing cognitive challenges, that he was chatting with a real woman. Meta's product design allowed the chatbot to insist it was human and even displayed chats with a verified user checkmark.²⁷ The chatbot convinced him to leave home, travel to New York, and visit her. This eventually led to the devastating death of Thongbue, a beloved husband, father, and retired chef.

There have been 11 other deaths associated with AI psychosis and excessive chatbot use between March 2023 and December 2025.²⁸ These tragedies expose critical gaps in regulation: without prominent warning labels, clear disclosures about AI limitations, and mandatory safety testing, AI tools can deceive vulnerable populations and enable dangerous behaviors.

Discussions on the psychosocial impact of chatbots on seniors and youth revealed widespread frustration with AI companies' refusal to take on liability for the harms generated by their products. In the absence of guardrails and effective disclosures, the burden of user safety fell onto individuals.

5. AANHPI community members want transparency, control, and accountability in the use of their data.

AANHPI community members expressed a profound sense of betrayal when they interrogated how their cultural data was being used to build and train these AI tools. For centuries, the transfer of intergenerational cultural knowledge in Native Hawaiian culture—language, dances, oral tradition, land stewardship practices—has been governed by sacred data governance principles. These practices are rooted in oral transmission with *hā* (life force) and *kaikua'ana/kaikaina* (relationship-based learning).²⁹ Today, however, AI companies have disregarded these traditions and indiscriminately collected this sacred data to train models. These models then reproduce it, severed from the cultural context, divorced from the consent-based frameworks that have governed this knowledge for centuries, and often presented through a culturally biased lens. One Native Hawaiian community leader was precise in articulating this dynamic:

“It’s the latest iteration of cultural imperialism.”

The profits turned over by this massive data extraction are reflected in the AI companies’ massive valuation, but rarely ever in compensation for the communities that stewarded the knowledge in the first place.

Protecting Cultural Data

Native Hawaiian data governance frameworks are rooted in Indigenous sovereignty that offer critical alternatives to commodified Western data practices. These principles have been formalized through two historic declarations: the 2003 Paoakalani Declaration and the 2021 Huamakahikina Declaration.³⁰ The participants “united to express [their] collective right of self-determination to perpetuate [their] culture under threat of theft and commercialization.”³¹ These governance frameworks outline the protection of traditional knowledge and cultural practices. In 2023, the Hawaii State Legislature established a Native Hawaiian Intellectual Property Working Group to build off this work and develop solutions preventing cultural appropriation.³²

The model for Native Hawaiian data governance emphasizes collective ownership, recognizing that cultural knowledge transmitted through oli (chants), hula, and mo‘olelo (stories) belongs to the community as a whole.

AANHPI community members also expressed discomfort with the concept of their personal online data being collected to train AI models. This discomfort was underscored by the awareness that the **heads of major technology companies like OpenAI, Google, and Meta were publicly maintaining close financial and personal relationships with a federal administration that has openly expressed hostility towards immigrants.** Providers who worked with community members in particularly vulnerable circumstances—undocumented immigrants, survivors of gender-based violence, people seeking out reproductive healthcare—were concerned about potential scenarios where personal data that clients shared with AI-powered products could be obtained by law or immigration enforcement. These fears were exacerbated by the many reports of private companies developing AI-powered surveillance tools and openly sharing data with federal law enforcement agencies.³³

One of the providers who worked with survivors of domestic violence expressed concerns about other bad actors obtaining this kind of information in the event of a data leak: “Our [customer relationship management software] has an AI integration now—not that we opted into it. So, if that AI now has access to all the sensitive client information we have stored on that platform, and then it was to somehow leak one of my clients’ home addresses, we’d literally be dealing with threats of stalking and physical violence.” While these concerns about bad actors obtaining sensitive personal data were largely speculative, they reflected deeper anxieties about the privacy policies governing the tools that communities now depend on.

Nontransparent and inaccessible privacy disclosures strip AANHPI community members of the ability to make informed decisions about their data, effectively rendering consent meaningless. Community members expressed that they lacked both the capacity and technical expertise to parse privacy policies across the multiple platforms they used daily. This knowledge gap was compounded by structural barriers: opt-out mechanisms for data sharing and cookie policies, for example, were inaccessible to LEP individuals due to complex language, double-negative options, and misleading interfaces. **For many, accepting broad privacy terms felt like a precondition for accessing essential services rather than a meaningful choice.** Participants expressed a desire for stronger data rights, particularly the "right to be forgotten." The absence of clear, enforceable privacy protections left communities with no practical way to exercise such rights, leaving them trapped between accepting exploitative terms or losing access to necessary tools.

Some organization leaders expressed optimism about harnessing AI tools in their work, but this optimism was contingent on community-led data governance and model development. Groups emphasized the critical importance of maintaining control over their data through **closed-loop systems**—architectures where organizations could audit inputs, control outputs, and maintain data sovereignty. One immigrant-serving organization exemplified this approach: they were partnering with developers to train an AI chatbot on a locally hosted repository of community-informed resources to assist clients experiencing wage theft. By keeping the model and data on local servers under organizational control, they could ensure sensitive client information never left their infrastructure.

Discussions about this tool opened the door to a conversation about ways that AI tools could meaningfully support community-serving organizations, especially when faced with gaps in capacity and specialized knowledge. "It's not that we're inherently anti-AI," one community member clarified. "The issue is that we're being brought in after the fact—*after* it's been developed, *after* it's been deployed, *after* our data is already in someone else's system." Native Hawaiian participants emphasized that the determining factor in establishing community trust was data sovereignty; this meaning investment in closed-loop systems with local data storage, transparent data governance protocols, and the ability to audit what information entered and exited their models. Without these safeguards, AI tools represent yet another mechanism for extracting community knowledge without accountability or control.

For Us, By Us

An example of Native Hawaiian data governance principles in practice include Indigenous-led AI projects like the Lauleo app, developed collaboratively by local media and Hawaiian language stakeholders. They collected 413 hours of audio from 1,200 participants reading Hawaiian phrases to develop language technology while maintaining community control over the data.³⁴ As the founder explained, "Think of data like land. That's what data sovereignty is, right? They've taken our land. We now have to pay money to have access to our land, even to buy it back. When you think of data in the same way, you can see how so much is at stake here. We need to have sovereignty over the infrastructure that moves our data between our people."³⁵

6. AANHPI community priorities are not adequately represented in AI governance.

Participants noted that AI tools were misaligned with community priorities, *despite* significant AAPI representation in the tech sector's workforce. One student noted, "Even though it feels like there are a lot of Asians in Silicon Valley, the technology doesn't show it." Referring to AI tools used by ICE in immigration detentions, the student continued, "I just can't understand how you can come from an immigrant family and then turn around make this kind of technology."

Community leaders felt that rather than being designed for public good, many AI tools were optimized to maximize profits. One community member pointed to AI chatbots as an example: while the technology could provide companionship for isolated seniors or even help organizations fill critical needs, its *actual* deployment prioritized profit over people.³⁶ Participants were particularly disturbed by the mention of Meta's decision to use data from users' interactions with their chatbots to inform targeted advertisements.³⁷ As one participant put it, "Instead of making good technology, they're just trying to find more ways to make as much money off of us as they can."

Student participants resigned to a cautiously nuanced conclusion: **while the technology itself may be neutral, the decisions about its application are deeply political choices that carry profound consequences.** The same facial recognition technology that unlocks phones can also identify individuals at immigration checkpoints. Predictive algorithms streamline benefit approvals but can also flag families for heightened scrutiny. AI chatbots provide legal guidance but can also generate conversation records that could be subpoenaed in deportation proceedings. AANHPI representation in AI engineering and development roles at tech companies, therefore, was not enough to avoid AI harms; it would require more community needs represented in the deployment of these tools.



Silicon Valleys, Bamboo Ceilings

A closer examination of Asian American representation in the tech sector may reveal potential causes for this perceived dissonance. **While Asian Americans are well-represented in engineering and technical development roles, they remain conspicuously absent from governance, trust and safety, and policy positions where decisions about AI deployment and accountability are made.**³⁸ Research about the "bamboo ceiling" points to stereotypes about leadership qualities, perceptions that Asian Americans don't 'fit' U.S. executive culture, and the perpetual foreigner myth that casts them as outsiders regardless of citizenship.³⁹ The result: Asian Americans with a significant role in AI development, but not in AI decision-making and deployment.

Students and community leaders brainstormed ways for communities to be represented throughout AI deployment: consent-based data frameworks, participatory design models, and community input on whether to deploy tools at all. These interventions, however, required that community members had the digital access to participate in AI governance in the first place. One Native Hawaiian leader described the dynamic:

“Native Hawaiians are sophisticated enough to be engaged with AI governance. But we aren’t in places where decisions are being made, because the historical legacy of the digital divide means many of us still lack internet access, let alone fair opportunity to participate.”

But ultimately, they concluded that the burden of creating responsible AI tools should not fall entirely on community members to advocate for their needs at every stage of deployment and governance. Participants emphasized that **companies and regulators have a responsibility to build consumer protections into their tools from the start.** Opt-out options, clear disclosures, understandable terms and conditions, and bias testing should be standard practice in AI development—not negotiable add-ons contingent on community advocacy.

04

Community Solutions

Building community power and resilience in the age of AI.

While federal legislation protecting consumer rights and centering community needs is essential to equitable AI governance, communities can begin building power and influence today. The following recommendations are designed for organizers, practitioners, leaders, funders, and developers seeking to strengthen community voice in AI decision-making. These strategies represent a ground-up approach to governance.

These are not a substitute for comprehensive policy, but a necessary complement that ensures communities most affected by AI systems have agency in shaping them, regardless of whether and when federal action arrives.

Solutions

1. Strengthen Media Literacy and Trusted Information Networks
2. Expand Personal Digital Security and Data Privacy Education
3. Center Workers' Rights in the Age of Algorithmic Management
4. Equip Community-Facing Organizations with Technical Capacity for AI Governance
5. Prioritize Co-Development and Community-Led AI Innovation
6. Invest in Human-Centered Alternatives to AI

Strengthen Media Literacy and Trusted Information Networks

Communities must be equipped to identify AI-generated misinformation, deepfakes, and manipulative content before these tools erode trust in information networks entirely. Media literacy education should begin early, teaching community members in digital literacy courses about AI's capabilities for hallucination, sycophantic validation, and visual deception.⁴⁰ To dispel common myths about these tools as infallible, all-knowing technologies, experts also suggest pairing AI literacy courses with non-technical, digestible explanations of how AI systems are trained and built. These explanations should emphasize that AI chatbots are designed to train a response, regardless of accuracy. Explanations should also describe how biases and prejudices from the real world can be reflected in the model.

These educational efforts must be paired with investments in robust, community-based information ecosystems anchored by trusted messengers: leaders, organizations, and institutions that communities already turn to for guidance. This means sustained funding for ethnic media outlets, community newsletters, print media, and local organizations that can serve as defenses against misinformation. Building stratified information flows helps to create bulwarks against misinformation and ensures that when false or harmful content circulates, trusted voices can quickly counter it with accurate, in-language information delivered through established networks of credibility.

Expand Personal Digital Security and Data Privacy Education

AANHPI community members need accessible, culturally grounded education on personal digital security, data privacy, and responsible AI use. Digital literacy courses should prioritize culturally competent and generationally informed conversations about surveillance harms, data exploitation, digital fraud, and collective strategies for protection. Education efforts should communicate the specific vulnerabilities faced by immigrant communities, including how data collected for one purpose can be weaponized for law enforcement or surveillance.

Community resources—such as a conversation guide on the risks of surveillance or a toolkit on practical steps to strengthen personal digital security—should be developed considering historical, cultural, and intergenerational nuances in perspectives held by different community members. Messaging around the harms of surveillance geared towards AANHPI immigrant parents, for example, should consider cultural assumptions about public safety and policing. Educational materials should be developed in-language, delivered by trusted messengers, and designed to meet community members where they are.

Center Workers' Rights in the Age of Algorithmic Management

As AI systems increasingly mediate hiring, performance evaluation, and termination decisions, workers need to be empowered with education about the risks of algorithmic bias and their rights in AI-managed workplaces. Professional development programs should include training on how AI bias can manifest in hiring and employment decisions, what legal protections exist, and how to document and challenge discriminatory outcomes. Workers need clear, accessible answers to questions like "I just got fired by an algorithm—what rights do I have?"

These trainings must be conducted in-language and should equip workers with concrete strategies for advocacy and organizing. Worker education should also emphasize that algorithmic management is a labor issue, not just a technology issue, and that collective action remains one of workers' most powerful tools for demanding accountability.

Learning from Labor

The freight industry offers critical lessons for how automation affects workers and the importance of labor organizing in shaping those outcomes. U.S. ports have adopted automation technologies over the past decade, with mixed results on efficiency and worker impact.⁴¹ What emerges across all studies, however, is that worker input and collective action fundamentally shape automation outcomes. A California Legislature-commissioned study involving labor, port, and shipping company stakeholders found consensus that **successful automation requires "systems of feedback and evaluation driven by worker input to assess impact" and expanded "opportunities for collaboration between labor, management, and port authorities."**⁴² Where unions like the International Longshore and Warehouse Union (ILWU) have maintained power, they've secured displaced worker protections, input on terminal lease agreements, and requirements that automation demonstrate net benefits for workers before implementation.⁴³ The freight industry demonstrates that the impact of automation is not predetermined; workplace conditions will depend on whether workers have the power, tools, and organization to take collective action and shape implementation.

Equip Community-Facing Organizations with the Technical Capacity for AI Governance

Community-serving organizations need resources and expertise to govern AI tools on their own terms. This requires dedicated funding and technical assistance to support organizations in developing comprehensive AI governance frameworks tailored to their missions and the communities they serve. Organizations should consider conducting thorough inventories of all AI tools currently in use or under consideration, reviewing privacy policies for alignment and accessibility, establishing clear protocols for handling sensitive data, and developing standard operating procedures that define acceptable use cases for AI within their operations.⁴⁴

Community governance is only possible, however, when tech companies design products that can actually be governed. This means building systems with robust privacy controls, transparent opt-out mechanisms, and accessible settings that enable meaningful self-governance. This work must be recognized as an essential infrastructure to AI development, not an afterthought. Technical experts can support community-facing organizations by distributing best practices to assist them in auditing AI tools, demanding transparency from vendors, and making informed decisions about whether and how to deploy AI within their communities—but the primary responsibility for building governable systems rests with the companies profiting from them.

Prioritize Co-Development and Community-Led AI Innovation

AI holds genuine potential to address real gaps in resources, but only when all communities are in the driver's seat of development. Funders, technologists, and tech companies should actively seek out opportunities for co-development: the processes by which community members, service providers, and technical experts work with AI developers from the earliest stages to define problems, design solutions, and establish governance frameworks.⁴⁵ Community-led development models ensure that AI tools are built for, rather than at the expense of, communities, with data privacy, transparency, and accountability embedded from the start.

Organizations and tech companies pursuing co-development should look to models with locally hosted AI systems trained on community-curated data, where communities maintain control over inputs, outputs, and ongoing governance.⁴⁶ A chatbot developed to support immigrants with legal inquiries, for example, could be designed by community members and AI developers to operate on a closed-loop infrastructure where all data remains within the organization, trained only on community-approved materials, and subject to ongoing oversight and audit.

Catching Blindspots

New York City's Department of Social Services provides one model for participatory design that demonstrates how consultation with impacted communities can lead to more accurate tools.⁴⁷ While developing the Standardized Housing Vulnerability Assessment model, which would determine the distribution of resources such as supportive and subsidized housing, the city had to create an algorithmic assessment tool that captured an individual's risk of housing insecurity. To identify the most relevant data inputs, the department convened focus groups with housing experts, community members, and over 40 organizations. These focus groups revealed factors that may have been otherwise overlooked had the model been developed in isolation: the nature and frequency of interactions with mobile crisis teams, functional impairments affecting meal preparation or housekeeping, parental responsibilities for children with behavioral or developmental disorders, and young adults' histories of labor or sex trafficking.

Invest in Human-Centered Alternatives to AI

Addressing AI harms ultimately requires meaningful investment in the non-AI resources that communities truly need: culturally competent mental health services, accessible legal aid, and intergenerational shared spaces where people can find companionship, support, and trust. AI vulnerabilities take root where these essential services have been historically underfunded—technology companies profit by exploiting gaps created by decades of disinvestment in immigrant and LEP communities. Closing these gaps through sustained investment not only addresses immediate needs but prevents the conditions that make communities vulnerable to exploitation in the first place. These human-centered services cannot be replaced by technological substitutes. The labor of care, connection, and community-building requires presence, relationship, and judgment that digital tools cannot independently provide.

This investment becomes even more critical if AI-driven job displacement and wealth inequality accelerates. Community organizations will be the social safety nets catching people when they fall; counselors, case workers, organizers, and neighbors show up when algorithms fail. These organizations must be resourced to expand their capacity, not downsized in favor of automation. The goal should never be to replace people-facing roles with AI tools that further isolate vulnerable individuals. Instead, policy and philanthropic investments should strengthen the human infrastructure that makes communities resilient: the relationships, expertise, and collective care that sustain people through crisis and change.

05

Policy Recommendations

Advocating for effective governance and meaningful guardrails.

AI is already embedded throughout AANHPI communities' lives, yet federal legislation lags far behind. Effective regulation minimizes harms *and* drives responsible, impactful innovation. When legislation prioritizes community well-being over profit, the result is higher-quality tools that serve rather than exploit. Federal policymakers can draw valuable lessons from state legislatures that have pioneered regulatory approaches for this new technological era.

The following recommendations offer guidance to legislators, developers, and advocates seeking to center community needs in AI policy and governance.

Policy Recommendations

1. Modernize civil rights protections to prevent algorithmic discrimination
2. Enact comprehensive consumer privacy protections
3. Enact procurement standards for government AI deployment
4. Clarify developer liability to support human oversight
5. Establish accessible content labeling standards for AI-generated material
6. Close the digital divide through universal broadband access

1. Modernize civil rights protections to prevent algorithmic discrimination

As AI increasingly informs consequential decisions, federal legislation should prevent algorithmic discrimination before it occurs. Existing Civil Rights protections—including in employment, education, housing, health care, financial services, insurance, criminal justice, immigration enforcement, elections, government benefits, and public accommodations—must be updated to explicitly cover AI-informed outcomes. **Congress should require independently audited pre-deployment evaluations and post-deployment impact assessments of algorithmic decision-making tools to identify potential bias against protected groups.** Algorithms that are found to discriminate or cause disparate impact should be prohibited in these consequential contexts.

Legislation should mandate transparency so individuals know when AI is evaluating them and how it influences decisions affecting their opportunities. Transparency disclosures should be accessible in the language of the impacted individual. **When an AI system leads to an adverse outcome—such as a rejected job application, wrongful arrest, or unlawful detainment—individuals should receive an explanation of how the decision was made and have the right to appeal.** Strong enforcement mechanisms, including empowering the FTC, state attorneys general, and private individuals to bring legal action, can provide meaningful accountability when discrimination occurs.

2. Enact comprehensive consumer privacy protections

Federal privacy legislation should provide individuals with meaningful control over their personal information. Congress should establish actionable consumer rights, including **opt-out mechanisms** for data sales and AI training; access and **deletion rights** for personal data in company databases and training datasets; **data minimization requirements** limiting collection to necessary purposes; and **restrictions on selling personal data** without consent.

Accessible privacy disclosures on digital platforms are essential for empowering consumers to practice their privacy rights. Companies should be **required to clearly display their privacy policies in plain language and, where possible, make notices accessible in users' preferred language.** These disclosures should clearly state whether data will be used for AI training, sold to third parties, or shared with government agencies. Enhanced protections should apply to sensitive and biometric data. Enforcement should comprise government oversight, private rights of action, and meaningful penalties.

3. Enact procurement standards for government AI deployment

Government agencies increasingly deploying AI with inadequate oversight and community input. Federal and state legislation should prohibit AI applications with proven discriminatory impacts, including facial recognition in law enforcement and surveillance systems that disproportionately harm communities of color. **AI tools designed to target vulnerable populations—such as systems that identify immigrants or surveil political dissent—should be banned outright.** Procurement standards should require impact assessments before government agencies acquire or deploy AI systems. Agencies must comply with Privacy Act requirements, including filing public System of Records Notices *before* beginning to collect new data about individuals. Data collection should be limited to what is strictly necessary for stated purposes.

Local agencies should engage community members, advocates, service providers, and other impacted parties in participatory design processes that inform AI development and deployment decisions. Community input helps identify what equitable outcomes look like in practice, surfaces data gaps that lead to inaccurate predictions, and illuminates factors that must be accounted for in order to produce fair and effective systems. This collaborative approach builds public trust and ensures AI tools serve rather than surveil communities.

4. Clarify developer liability to support human oversight

Legislation should clarify that developers of AI systems bear liability for preventable and foreseeable harm caused by their products.

Developers should be incentivized to limit liability exposure by demonstrating adherence to established safety frameworks such as the NIST-AI-600-1 AI Risk Management Framework.⁴⁸ This includes conducting risk assessments, implementing safeguards, and monitoring adverse outcomes.

In consequential contexts, **liability frameworks should support robust human-in-the-loop decision-making that enable, rather than obscure, human oversight.** Meaningful human-in-the-loop processes require that AI systems deployed in these high-risk settings include built-in explainability features allowing practitioners to understand how the system reached its conclusions and what data informed its recommendations. Additionally, organizations deploying AI tools that augment decision-making should empower practitioners with clear authority to override algorithmic recommendations, comprehensive training on when and how to exercise that authority, and protection from liability when they appropriately deviate from AI outputs based on professional judgment.

5. Establish accessible content labeling standards for AI-generated material

The proliferation of AI-generated content creates serious risks for AANHPI communities navigating linguistic barriers and targeted misinformation. Platforms should require clear labeling of AI-generated images, video, audio, and text, with heightened requirements for high-risk context. Where possible, **labels should be displayed in the language the user is engaging in**; provenance standards that only appear in English fail to protect LEP individuals from AI-generated misinformation and deception. Standards should include both visible watermarks and embedded metadata.

Legislation should also prohibit AI systems from impersonating humans or professionals in contexts that pose material risks. Chatbots and virtual agents must prominently and continuously disclose their non-human nature through persistent visual indicators in the language the user is engaging in. This is particularly critical for chatbots that may be misinterpreted as medical professionals, legal advisors, government officials, or community leaders.

Consumer protection frameworks should extend to AI chatbots, ensuring accountability when these systems cause harm through misinformation, emotional manipulation, or inappropriate guidance.

6. Close the digital divide through universal broadband access

Universal broadband access is essential infrastructure. **The Broadband Equity, Access, and Deployment (BEAD) program should be administered as initially legislated to fund infrastructure build-outs in historically excluded communities**. Programs that subsidize the cost of connectivity should be sustainably funded and expanded to ensure cost is not a barrier to internet access. Digital tools and information about accessing subsidized programs—including enrollment instructions, eligibility criteria, and applications—should be made accessible to individuals with limited English and technical proficiency.

Investment in **culturally competent digital literacy programs is essential to closing the digital divide**. Community-serving organizations and trusted messengers should deliver programs designed around their members' needs, language skills, and priorities—whether that includes basic digital literacy, understanding privacy settings, recognizing AI-generated content, navigating opt-out mechanisms, or other skills communities identify as critical.

Conclusion

Artificial intelligence is reshaping every dimension of life for AANHPI communities, often with profound consequences: surveillance technologies facilitate immigration enforcement, chatbots exploit elderly LEP individuals' isolation, and deepfakes weaponize trusted messengers to spread misinformation. Conversations in these listening sessions, however, reveal communities' appetite and capacity to engage meaningfully with these issues. When given space to articulate their experiences, AANHPI community members identified specific harms, questioned underlying assumptions, and proposed concrete solutions. This expertise should inform the creation of technologies that are fairer, more transparent, and more accountable.

Digital equity means everyone is entitled to responsible AI systems and meaningful protections, regardless of technical literacy, language proficiency, or socioeconomic status.

Privacy protections, safeguards against algorithmic discrimination, and transparency requirements should be built into systems from the start. These recommendations provide a roadmap for closing the digital divide through investment in infrastructure and in-language literacy programs, support for community organizations building technical capacity, and proactive regulatory frameworks.

The findings articulate essential consumer protections that are nonnegotiable for community members. These recommendations should inform federal legislative agendas, guide funding priorities, and establish standards for innovation. AANHPI communities have articulated their vision for an AI-driven future; the only question that remains is whether developers and regulators have the will to deliver it.



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