

Governance and academic integrity in the era of artificial intelligence: comparative documentary analysis in Latin American universities

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The IAGen study reveals transformations in the academic integrity guidelines of Latin American universities. This research compares thirteen (13) institutions from Peru, Colombia, Venezuela, Ecuador, and Costa Rica by analyzing their national policies, guides, guidelines, regulations, and frameworks for the use of AI, published between 2023 and 2026. A proprietary model was developed to analyze six dimensions: Governance and Leadership, Ethics, Equity and Transparency, Academic Integrity and Authenticity, Data Protection and Intellectual Property, Training and Competencies, and Continuous Improvement and Evaluation. This model is grounded in UNESCO's AI framework and the RAFTS model. Through a qualitative comparative document

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analysis, thirteen institutional documents published between 2023 and 2026 were coded across three levels of presence (absent, partial, complete), yielding an inter-coder reliability Cohen's Kappa of 0.78. The results identify three key findings: (i) a two-phase adoption process comprising pioneering first-generation institutions (high-level decrees) followed by a second operational wave characterized by specialized committees; (ii) a structural gap between ethical declarations and the operationalization of mandatory usage declaration mechanisms; and (iii) continuous updating as the least developed dimension. The study concludes that intraregional asymmetries demand collaborative frameworks and auditability mechanisms that extend beyond mere declarations, despite regional progress toward document governance.

Keywords: Academic integrity; generative artificial intelligence; university governance; institutional policies; Latin America; comparative documentary analysis.

1. Introduction

1.1. Context and statement of the problem

At the end of 2022, the launch of ChatGPT and its widespread adoption within weeks caused an unprecedented reorganization of the academic integrity regime in Latin American higher education, comparable only to the widespread use of the Internet in classrooms at the start of the 21st century. Regional universities are responding to GenAI with regulatory matrices that range from specific guidance to structuring regulations, focusing on academic authorship, assessment processes, and teacher training based on trust in the pedagogical relationship.

The digital gap, scarce finances, growing national regulatory frameworks, and technology provider asymmetries make Latin America's regulatory response unique (Nougrères, 2023). For 2023–2026, ChatGPT's regulatory acceleration created a privileged corpus for observing the regional institutional response's formalization.

This article argues that Latin American universities' institutional GenAI policies configure documentary governance in incomplete transition: convergent in ethics due to UNESCO normative influence, but divergent and fragmented in operational aspects like

mandatory use declaration, impact assessment, and periodic updating. The comparative documentary analysis of thirteen institutional policies using a unique six-dimensional analytical model supports this thesis.

However, the specialized literature presents two fragmented lines that hinder regional understanding. Most local case studies without a comparative perspective (Flores Morales et al., 2025) give descriptive richness but cannot identify regional patterns or compare institutional trajectories. However, a theoretical approach presents normative reference frameworks (IA593 Framework of Ecuador; RAFTS model of EthicalAI project) without empirical anchoring in institutional policies. The outcome is a gap in documented forms and regional patterns of university GenAI responses, which this study addresses by comparing thirteen institutional policies issued between 2023 and 2026.

1.2. Research question and objectives

This study's driving question: Latin American universities' formal responses to GenAI: what trends emerge from a structured documentary analysis? This question has four specific objectives: (i) to characterize and compare the documentary forms of GenAI institutional policies in thirteen Latin American universities

selected through explicit criteria; (ii) to apply an original analytical model of six dimensions, derived from the international UNESCO (2021, 2024) and RAFTS frameworks, as well as Coates et al. (2025), to the systematic coding of the thirteen policies; and (iii) to identify.

1.3. Original contribution of the study

Three reasons make this paper unique in the literature. First, it provides the first systematic comparative analysis of GenAI institutional policies in five Latin American countries (Peru, Colombia, Venezuela, Ecuador, and Costa Rica) for 2023–2026, expanding single case studies (Buele et al., 2025; Ospina-Deaza & Gutiérrez-Pinzón, 2026) and Global North analyzes. Second, it exposes three important gaps—governance, academic integrity, and constant updating—between ethical policy declarations and verifiable implementation. Third, third-party institutions can use their transportable six-dimensional analytical model for self-assessment and regional benchmarking with high inter-rater agreement (Cohen's Kappa = 0.78). Unlike Fernández-Miranda et al. (2024) or Wimmer (2022), this study presents comparable empirical data for its suggestions.

1.4. Structure of the article

This article includes 7 parts. The second section builds the six-dimensional analytical model by presenting the GenAI-era theoretical framework for university governance and academic integrity, international regulatory frameworks (UNESCO 2021, UNESCO 2024, RAFTS), and Latin American background (IA593 Framework and UNEMI proposal). Section 3 describes the comparative study's methodology: design, documentary corpus with formal identification of the thirteen participating institutions, selection criteria, formal list and justification of the UNESCO documents and international frameworks examined, articulation between the corpus and the thirteen universities, coding procedure, and codebook. Six analytical categories with comparison tables and text are covered in the fourth section. The fifth section examines typology, three key gaps, Northern Hemisphere comparisons, and regional policy

implications. The sixth section lists study limitations. Seventh outlines findings and research directions. The theoretical underpinning for our analytical model's core concepts and global regulatory frameworks is presented in the second section.

2. Theoretical framework

Having situated the problem in its context, in this section we articulate the theoretical framework supporting our analytical model, starting from the operational definitions, reviewing the international regulatory frameworks and Latin American background, and culminating in the construction of the six-dimensional model applied in the results section.

2.1. University governance and artificial intelligence: operational definitions

According to specialized literature, university governance is the set of structures, processes, norms, and actors that determine who makes strategic decisions, how authority is distributed, and who is accountable. GenAI's speed of technological innovation, information asymmetry between technology providers and the university community, and new actors (specialized AI committees, observatories, university ombuds offices) change university governance. Coates et al. (2025) propose grouping GenAI-era academic integrity governance into four domains: governance architecture, people, technology and resources, and external pressures. These categories allow institutional policies to be viewed as organizational configurations integrating hierarchy, academic professionalism, and external pressure.

Governance is complemented by government (formal bodies with ultimate authority) and management or administration. This distinction is useful in GenAI because the policies analyzed may include governance (specialized committees, guiding principles, articulation with external bodies), government (responsible authorities, decision-making mechanisms), and management provisions. The current study concentrates on governance and government,

leaving daily management for supplemental analysis.

2.2. Academic integrity and augmented authorship in the era of GenAI

Academic integrity theory matured in the 1990s and 2000s (Wimmer, 2022; McCabe et al., 2012). McCabe et al. (2012) found that institutional culture greatly affects higher education students' ethics. Bearman et al. (2023), Crompton and Burke (2023), and Coates et al. (2025) agree that GenAI raises university qualification quality and legitimacy standards and update this thesis.

Academic integrity policy approaches were organized into six interrelated areas by Azevedo et al. (2026): access, approach, support, prevention, detection, and capacity. Access is the student's material and institutional ecology for using AI tools, approach is the typological categorization of sanctioning or corrective instances and continuing training, and preventive is predicting external situations and endogenous regulation in GenAI. Foltynnek et al. (2023) suggest authorship expansion, where GenAI participation in literary works confuses authorship and plagiarism. Ucan and Demirel Ucan (2026)'s six-level taxonomy classifies GenAI-mediated works' academic irresponsibility from format correction to plagiarism (Buele et al., 2025; Sullivan et al., 2023), giving a framework for institutional policies.

2.3. The UNESCO Recommendation on the Ethics of AI (2021) and the UNESCO Guidance for the use of GenAI in education and research (2024)

In November 2021, the UNESCO General Conference adopted the Recommendation on the Ethics of Artificial Intelligence, the most authoritative global framework for GenAI regulation in higher education (UNESCO, 2021). This first global standard adopted by UNESCO's 193 Member States outlines ten principles: proportionality and do no harm, safety and security, transparency and explainability, responsibility, accountability, environmental sustainability, awareness and

literacy, inclusion, human rights and fundamental freedoms, and human oversight. The Recommendation's human-centered approach to education has shaped Latin American institutional policies explored in this paper.

Additionally, UNESCO's 2024 Guidance for the use of generative AI in education and research operationalizes the 2021 principles for GenAI. The guidance suggests seven steps for institutional regulation: impact assessment, multi-stakeholder committee formation, principle and rule definition, co-design with academics, teachers, students, and researchers, communication and training, monitoring and review, and periodic updating. Most of the thirteen institutions evaluated use these seven processes as an operational reference, especially for governance, training, and continual upgrading of the analytical model. The documentary coding shows that eleven of the thirteen institutions expressly use the 2021 Recommendation and 2024 Guidance as reference frameworks, confirming UNESCO's prominence in the regional debate.

2.4. The RAFTS model of the EthicalAI project

Complementary to but independent of the UNESCO framework, the EthicalAI project — an Erasmus+ initiative coordinated by European and Latin American universities— has developed the RAFTS model (Responsibility, Equity, Fairness, Transparency and Sustainability) for AI governance in higher education (Mccusker & Michalak, 2025). The RAFTS model relates ethical principles to operational mechanisms such as multi-stakeholder committees, institutional testing environments (sandboxes), and impact assessments (Memarian & Doleck, 2026). Its relevance to the Latin American comparative analysis lies in its offering a bridge between UNESCO's principled declaration and effective operationalization, a bridge that has been taken up by several of the thirteen institutions analyzed, particularly those of the second and

third generations (ULA, Universidad del Rosario, Universidad EAN).

2.5. Latin American background: the IA593 Framework and the UNEMI proposal

GenAI governance approaches for higher education are evolving regionally. Fernández-Miranda et al. (2024) and Wimmer (2022) have systematized Latin American institutions' problems, highlighting technology innovation's speed vs regulatory competency. Based on the FATE pillars (Fairness, Accountability, Transparency, Ethics) and UNESCO standards (Vercelli, 2024), the IA593 Framework (Chamba-Eras et al., 2026) proposes an operational matrix for Ecuadorian higher education. The State University of Milagro UNEMI proposal (Montero Reyes et al., 2026) contains technological, social, and GenAI responsibility measures.

Comparative regional literature is new. Parker (2025) surveyed five countries, Alba (2026) examined U.S. universities, and Humble (2025) examined Europe. Research on Latin America is primarily national (Moller-Acuña et al., 2024; Velázquez-Ramos et al., 2026; Pires et al., 2025;

Vercelli, 2024) and lacks a regional perspective. This study fills this gap by examining thirteen institutional policies in five Latin American countries.

2.6. Construction of the integrative analytical model of six dimensions

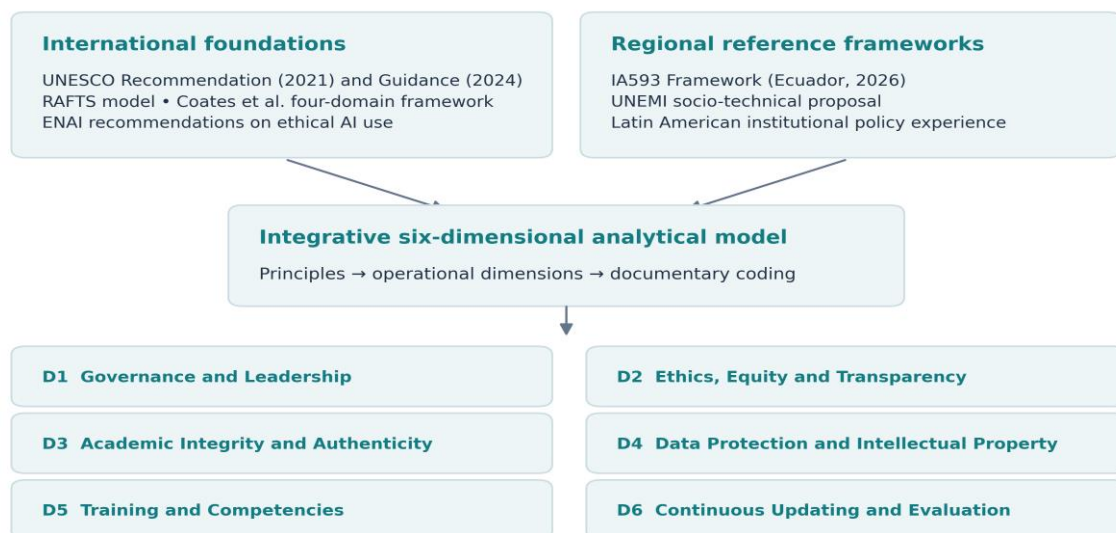
Based on the international frameworks and regional background reviewed, the study constructed an original six-dimensional analytical model that articulates the proposals of UNESCO (2021, 2024), the RAFTS model, the four-domain framework of Coates et al. (2025), and contributions from the specialized literature on academic integrity and GenAI (Foltynek et al., 2023; Ucan & Demirel Ucan, 2026; Bearman et al., 2023). The model was constructed through inductive synthesis: two researchers on the team conducted a parallel reading of the identified normative frameworks, extracted recurring principles and mechanisms, and grouped them into six operationalizable dimensions with sub-indicators and coding rules. The synthesis was validated through discussion until full consensus was reached. Table 1 presents the resulting model with its operational definitions and search indicators.

Table 1. Six-dimensional analytical model of GenAI governance in higher education.

Dimension	Operational definition	Search indicators
D1. Governance and Leadership	Defined authorities, specialized committees, and decision-making processes.	Is there a responsible authority or committee? Is there a specific governing body?
D2. Ethics, Equity and Transparency	Explicit principles, equity, bias mitigation, and algorithmic transparency.	Are ethical principles mentioned? Is equity and inclusion addressed?
D3. Academic Integrity and Authenticity	Authorship, AI declaration, and plagiarism prevention.	Is use declaration regulated? Is augmented authorship addressed?
D4. Data Protection and Intellectual Property	Privacy, data security, and intellectual property.	Are there privacy rules? Is intellectual property regulated?
D5. Training and Competencies	Teacher training and critical student AI literacy.	Is teacher training contemplated? Is critical literacy promoted?
D6. Continuous Updating and	Periodic review, impact assessment, and technological	Is periodic review provided for?

Evaluation	adaptation.	Is AI impact evaluated?
Note. The model is our own elaboration, derived from the synthesis of the UNESCO frameworks (2021, 2024), RAFTS (Mccusker & Michalak, 2025), and Coates et al. (2025). Each dimension was coded at three levels: absent (0), partial (1), and complete (2). 2.7. Regional normative reference framework Figure 1 illustrates the proposed integrative six-dimensional analytical model, which is structured upon a synthesis of international foundations and regional reference frameworks. The methodology transitions from foundational principles—such as the UNESCO		Recommendation and RAFTS model—to operational dimensions, culminating in a documentary coding system. This framework organizes the analysis into six critical axes: governance, ethics, academic integrity, data protection, training, and continuous evaluation. The comparative scope encompasses twelve national institutional cases across five countries, utilizing UNESCO as a global benchmark. Ultimately, this regional normative framework facilitates a structured evaluation of AI adoption within Latin American higher education contexts, ensuring alignment with both local socio-technical proposals and global standards.

Figure 1. Regional reference models and comparative approach



Comparative scope: 12 national institutional cases in five countries + UNESCO as an international reference.

Note. Own elaboration.

3. Materials and Method

Based on the theoretical framework presented, this section details the materials and method of the comparative study: approach and design, formal identification of the thirteen participating institutions, selection criteria applied, formal list and justification of the UNESCO documents examined, articulation between the UNESCO corpus and the universities, coding procedure, and codebook.

3.1. Approach and design

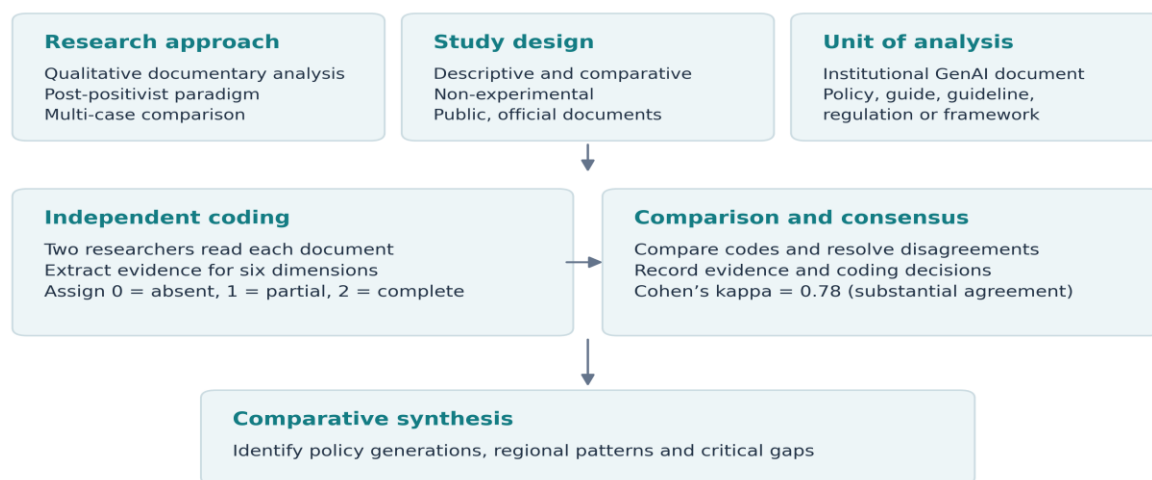
Post-positivist comparative documentary analysis was qualitative. Non-experimental, multi-case descriptive-comparative design (Yin, 2018). We examined and compared each document. Documentary analysis gives geographical plausibility and direct access to normative framework. GenAI in higher education is analyzed using Latin American university or regional reference body policies, guides, guidelines, rules, or governmental

frameworks. Analysis variables are Table 1's six analytical model dimensions.

Figure 2 shows this study using post-positivist qualitative documentary analysis. The descriptive, comparative, non-experimental multi-case study examines institutional GenAI policies and guidelines. Two researchers independently rate evidence in six categories

from 0 (absent) to 2 (complete). Cohen's kappa of 0.78 indicates strong agreement after conflicts are handled in the comparison and consensus phase. Finally, a comparative overview illustrates policy generations, geographical patterns, and important gaps in thirteen publications.

Figure 2. Research approach and design



Corpus: 13 documents; national institutional publication window: January 2023-June 2026.

Note. Own elaboration.

3.2. Documentary corpus: identification of the thirteen participating institutions

The documentary corpus consists of thirteen (13) institutional documents published between January 2023 and June 2026 by universities from five Latin American countries (Peru, Colombia, Venezuela, Ecuador, and Costa Rica) or by

regional reference bodies. Table 2 presents the formal list of participating institutions, identifying country, document type, publication year, and verifiable official source. This list responds to the need to fully identify the units of analysis of the study, a methodological transparency that enables replication and external auditability.

Table 2. Formal list of the thirteen participating institutions and documents analyzed.

No.	Institution (acronym)	Country	Document type	Year	Official source
1	Universidad Católica Andrés Bello (UCAB)	Venezuela	Rectoral Decree No. 2.91	2023	https://www.ucab.edu.ve/wp-content/uploads/2023/06/2.91.pdf
2	Universidad de Los Andes (ULA)	Venezuela	General Guidelines (Circular CU-2156/25)	2025	https://web.ula.ve/cep/lineamientos-generales-sobre-inteligencia-artificial-en-la-universidad-de-los-andes/
3	Universidad Estatal ^a	Costa Rica	General Guidelines CONRE 2320-2024	2024	https://www.uned.ac.cr/

	Distancia (UNED)				
4	Universidad Nacional Mayor de San Marcos (UNMSM)	Peru	Guide for teachers (Rectoral Res. 008449-2025-R/UNMSM)	2025	https://viceacademico.unmsm.edu.pe/
5	Universidad Peruana de Ciencias Aplicadas (UPC)	Peru	Guidelines EYA-PYL-07 v02	2024	https://innovacioneducativa.upc.edu.pe/
6	Universidad Femenina del Sagrado Corazón (UNIFÉ)	Peru	Guide GUEIA PEAI 2025 v01	2025	https://unife.edu.pe/wp-content/uploads/GUIA_USO_ETICO_DE_IA.pdf
7	Universidad Marcelino Champagnat (UMCH)	Peru	Institutional policy on AI use	2025	https://umch.edu.pe/
8	Pontificia Universidad Católica del Perú (PUCP-EEGGL)	Peru	Specific directive for the School of General Studies, Letters, Languages and Literature	2025	https://www.pucp.edu.pe/
9	Universidad del Rosario	Colombia	AI in Action Program	2025	https://urosario.edu.co/ia-en-accion
10	Universidad EAN	Colombia	AI Regulation (Agreement 006)	2025	https://universidadean.edu.co/sites/default/files/institucion/reglamentos/Reglamento_Inteligencia_Artificial_Acuerdo_006_2025.pdf
11	Universidad Central de Colombia	Colombia	Institutional book: Intelligent use of AI for teachers and students	2024	https://libros.uccentral.edu.co/index.php/editorialuc/catalog/view/509/400/220
12	Universidad Estatal de Milagro (UNEMI) / IA593 Framework	Ecuador	Socio-technical control framework and IA593 Framework	2026	https://repositorio.unemi.edu.ec/xmlui/handle/123456789/8537
13	UNESCO (international comparative reference)	International	Recommendation on the Ethics of AI (2021) and UNESCO GenAI Guidance (2024)	2021 – 2024	https://unesdoc.unesco.org/ark:/48223/pf0000381137_spa

Note. Own elaboration based on the official institutional repositories of each university and the websites of international organizations. The inclusion of UNESCO as case 13 is methodologically justified by its character as a reference normative framework against which the twelve national institutional documents are contrasted.

3.3. Selection criteria applied and screening process

The selection of the thirteen institutions and documents was carried out through non-probabilistic purposive sampling, simultaneously addressing four explicit inclusion criteria. First, only public and official documents published between January 2023 and June 2026 were included, a period spanning from the massive emergence of the ChatGPT model to the consolidation of the second operational wave of policies. Second, the documentary types included were: rectoral decrees, regulations, guidelines, practical guides, and national frameworks. Third, documents in Spanish (predominant) and English (for international reference documents included in the comparative corpus) were considered. Fourth, and as the central methodological criterion,

institutions were selected that had formally published specific AI policies—that is, normative instruments explicitly intended to regulate the use of GenAI—, excluding institutions that only mention AI tangentially in their general statutes or in non-normative press releases.

The exclusion criteria were three: (i) non-normative press releases, personal opinions of authorities without institutional backing, and draft documents not officially published; (ii) sectoral documents without an institutional purpose (for example, guides from an individual course without faculty or university approval); and (iii) policies of technology providers (Google, Microsoft, OpenAI) which, although relevant to the use of GenAI, do not constitute university instruments. The screening process was documented in four phases: (a) 45 potential documents were initially identified through systematic searches in official institutional repositories, education ministry websites, and databases of international organizations; (b) after applying the officiality criterion, 28 documents were eligible; (c) after applying the validity and normative-character criteria, the corpus was refined to 13 documents for in-depth qualitative analysis. Figure 3 summarizes the process.

Figure 3. Documentary corpus and selection criteria



UNESCO reference includes the 2021 Recommendation and 2024 Guidance (Table 2).
Exclusion totals are calculated from the screening counts reported in Section 3.3.

Note. Own elaboration based on the documentary corpus, with public documents from 2023–2026.

3.4. UNESCO documents and international frameworks examined: formal list and justification

The study takes as international normative reference frameworks four documents produced by UNESCO and related organizations, the list of which is formally presented in Table 3. The

inclusion of these frameworks in the analysis is justified by their status as regionally recognized normative references: the thirteen participating institutions explicitly cite at least one of these frameworks in their policies, confirming their role as a shared reference. The formal identification and justification of these documents directly addresses the methodological observation to systematize the UNESCO normative corpus examined.

Table 3. UNESCO documents and international frameworks examined as normative references.

Code	Document	Publishing institution	Year	Justification for inclusion
M1	Recommendation on the Ethics of Artificial Intelligence	UNESCO	2021	First global standard adopted by 193 Member States; principled foundation of the institutional policies analyzed.
M2	Guidance for the use of generative AI in education and research	UNESCO	2024	Operationalization of the 2021 UNESCO principles for GenAI; seven-step process adopted by the thirteen institutions.
M3	RAFTS Model (Responsibility, Equity, Fairness, Transparency, Sustainability)	EthicalAI Project (Erasmus+)	2024–2025	Bridge between UNESCO principled declaration and operationalization through multi-committees, sandboxes, and impact assessments.
M4	Four-domain framework for academic integrity governance in the era of GenAI	Coates, Croucher and Calderon	2025	Articulation of governance, people, technologies, and external pressures; reference for dimensions D1 and D5 of the model.
M5	IA593 Framework: AI governance, ethics and strategy in higher education	Chamba-Eras et al. (Ecuador)	2026	Latin American regional background; FATE pillars and UNESCO recommendations; comparative reference for Ecuadorian institutions (UNEMI) and the Andean region.
M6	ENAI recommendations on the ethical use of AI in education	European Network for Academic Integrity (Foltynek et al.)	2023	European comparative reference for dimension D3, academic integrity and authenticity; cited by 4 of the 13 institutions.

Note. Own elaboration. M1 and M2 constitute the central UNESCO normative corpus; M3 and M4 are complementary international frameworks; M5 and M6 are regional and European background, respectively.

3.5. Link between the UNESCO documentary analysis and the thirteen universities

Four complementary levels document the UNESCO corpus (M1–M6) and thirteen institutional policies. Institutional policies' ethical inclusiveness is assessed at the normative-ideal level by comparing the UNESCO Recommendation 2021 (M1) principles and the Guidance 2024 (M2) seven phases. Dimension D1 (Governance and Leadership) from the seven-step UNESCO Guidance 2024, D2 (Ethics, Equity, and Transparency) from the ten principles of the UNESCO Recommendation 2021 and the RAFTS model, and D3 (Academic Integrity and Authenticity) from Coates et al. (2025) and the ENAI

Frameworks M1, M2, M3, and M5 provide the qualitative and typological foundation for descriptive-regional institutionalization trajectories of the thirteen institutions. The RAFTS model (M3) and Coates et al. framework (M4) conceptualize dimensions D1, D2, and D5. UNESCO frameworks influence Latin American national and institutional policies, especially in the absence of robust national legal frameworks (Wimmer, 2022). Each analytical category used on institutional texts is explicitly from the UNESCO normative corpus, guaranteeing methodological traceability between the reference framework and empirical coding.

3.6. Databases and repositories consulted

The documentary sources consulted were organized into three blocks. First, the official institutional repositories of the thirteen selected universities, accessible from their institutional

websites. Second, the websites of ministries of education and national organizations for national frameworks (IA593 of Ecuador, rectoral resolutions, higher council agreements). Third, the databases of international organizations (UNESCO, EthicalAI, European Network for Academic Integrity). The search was complemented with queries in indexed academic databases (Scopus, Web of Science, SciELO, Redalyc, Dialnet) to identify secondary literature documenting the institutionalization process of AI policies in Latin American universities during the 2023–2026 period.

3.7. Coding procedure and inter-rater reliability

Two researchers independently coded the six dimensions in the thirteen corpus documents. Each coder followed five steps: (1) complete document reading; (2) extraction of relevant literal textual fragments for each sub-indicator; (3) independent assignment of code 0 (absent), 1 (partial), or 2 (complete) to each dimension; (4) comparison of codings and disagreements; and (5) reasoned discussion to reach consensus. Cohen's Kappa coefficient showed 0.78, which Landis and Koch (1977) considered strong agreement, exceeding the 0.70 threshold for qualitative documentary research. Initial differences were concentrated in dimensions D3 (Academic Integrity) and D6 (Updating), particularly at the boundary between codes 1 (partial) and 2 (complete), and were resolved by rereading the fragment and reasoned debate until full consensus was attained.

3.8. Codebook

The complete codebook is presented in Appendix A. It guarantees the auditability and replicability of the study. For each dimension, the following are defined: (a) operational definition, (b) sub-indicators, (c) coding rules (0 = absent, 1 = partial, 2 = complete), and (d) textual examples extracted from the corpus. The general scale is presented in Table 4.

Table 4. General coding scale of the six-dimensional analytical model.

Code	Criterion
0 — Absent	No explicit references or development of the dimension in the analyzed document.
1 — Partial	Declarative or principled mention, without verifiable mechanisms or designated responsible persons.
2 — Complete	Operational definition, responsible persons, mechanisms, and verifiable legal framework.

Note. Gradual system for capturing the transition from principled declaration to effective operationalization.

4. Results

Having applied the methodology described, this section presents the results of the documentary analysis of the thirteen institutional policies. The presentation is organized into four blocks: description of the corpus, comparative matrix by dimensions, analysis by dimension with detailed textual evidence, and synthesis of findings.

4.1. Description of the analyzed corpus

Thirteen documents were analyzed: rectoral decrees (UCAB, UNMSM), general guidelines (ULA, UPC), practical guides (UNIFÉ, UNMSM, Universidad Central, UNESCO), mandatory regulations (Universidad EAN), general orientations (UNED), specific directives (PUCP-EEGGL), institutional programs (Universidad del Rosario), and national frameworks. UNESCO is included as an

international document for comparison. The documents are mostly from Peru (5) and Colombia (4), with some from Venezuela (2), Ecuador (1), and Costa Rica (1). Most documents were issued between 2024 and 2026; one was published in 2023 (UCAB). These data show regulatory acceleration when the ChatGPT model exploded in 2022.

4.2. Comparative matrix by dimensions

Table 5 presents the comparative matrix of the presence of the six dimensions of GenAI governance in the thirteen institutions analyzed. The results show a predominance of partial and complete policies in operational dimensions (D5 Training and D2 Ethics, Equity and Transparency), with notable absences in structural aspects such as D1 Governance and Leadership and D6 Continuous Updating and Evaluation. Inter-coder consensus was substantial (Cohen's Kappa = 0.78).

Table 5. Comparative matrix of presence by dimension and institution.

Institution	D1	D2	D3	D4	D5	D6
UCAB (Venezuela)	P	C	P	P	P	A
ULA (Venezuela)	C	C	C	P	C	C
UNED (Costa Rica)	P	C	P	C	C	C
UNMSM (Peru)	A	P	P	A	P	P
UPC (Peru)	P	C	P	P	C	P
UNIFÉ (Peru)	P	C	C	P	C	P
UMCH (Peru)	A	P	P	A	C	A

PUCP-EEGGLL (Peru)	A	P	P	P	P	A
Universidad del Rosario (Colombia)	C	C	C	P	C	C
Universidad EAN (Colombia)	C	C	C	C	C	C
Universidad Central (Colombia)	P	P	P	P	C	P
UNEMI/IA593 (Ecuador)	C	C	C	C	P	C
UNESCO (reference)	C	C	C	C	C	C

Note. C = complete; P = partial; A = absent. Cohen's Kappa = 0.78 (substantial agreement).

.3. Analysis by dimension

Dimension D1. Governance and Leadership

AI governance is diverse. The CEIA, Observatory, Technical Committee, Academic Integrity Committee with sanctioning functions, and AI in Action program with institutional coordination are all represented by ULA, Universidad EAN, Universidad del Rosario, IA593/UNEMI, and UNESCO. UCAB, UNED, UPC, UNIFÉ, and Universidad Central assign responsibility to academic vice-rectors and deans without identifying roles or specialized committees. Three institutions—UNMSM, UMCH, and PUCP-EEGGLL—lack governance provisions. Textual evidence implies that second- and third-generation institutions consolidate specialized committees with their own funds and functions, following UNESCO's seven-step procedure (2024).

Dimension D2. Ethics, Equity and Transparency

Ten of thirteen most developed institutions are in this corpus dimension. The most frequent reference frameworks are FATE and the UNESCO AI Ethics Recommendation (2021). Universidad EAN has 10 ethical standards, including environmental responsibility, algorithmic transparency, and non-discrimination, whereas Universidad del Rosario has seven, including human intellectual control to retain authorship after GenAI intervention. Complete organically programmed for UNESCO. Three partially present institutions—UNMSM, UMCH, and PUCP-EEGGLL—discuss ethical norms without algorithmic bias prevention or transparency and explainability procedures. In the absence of solid national

legislation, UNESCO (M1 and M2) external drivers promote principle declaration rather than operationalization, maintaining this dimension.

Dimension D3. Academic Integrity and Authenticity

Four institutions have partial presence (P) (UCAB, UNED, UNMSM, UPC, Universidad Central), three have total absence (A), and six have complete presence (C). C universities must submit GenAI declarations in particular formats or use categories. ULA requires the tool type, function (creation, review, translation, synthesis), and intervention extent (% of final text, affected parts). Universidad EAN offers six declaration kinds. Universidad del Rosario employs taxonomic categories for structured declarations, per Ucan and Demirel Ucan (2026). Stereotyped formats are the main obstacle to ethical statement operationalization.

Dimension D4. Protection of Personal Data and Intellectual Property

Four institutions are full (C), five are partial (P), and four are absent (A). Laws 1581 of 2012 of Colombia (Universidad EAN, Universidad del Rosario, Universidad Central), 29733 of Peru (UNMSM, UPC, UNIFÉ, UMCH), and 8968 of Costa Rica clearly reference national legal frameworks. The Ecuadorian IA593 Framework follows UNESCO data-protection guidelines. General privacy mentions without legal context cause partial presence. UNMSM, UMCH, and PUCP-EEGGLL leave a major loophole that poses legal risks to students and teachers from GenAI systems processing personal data.

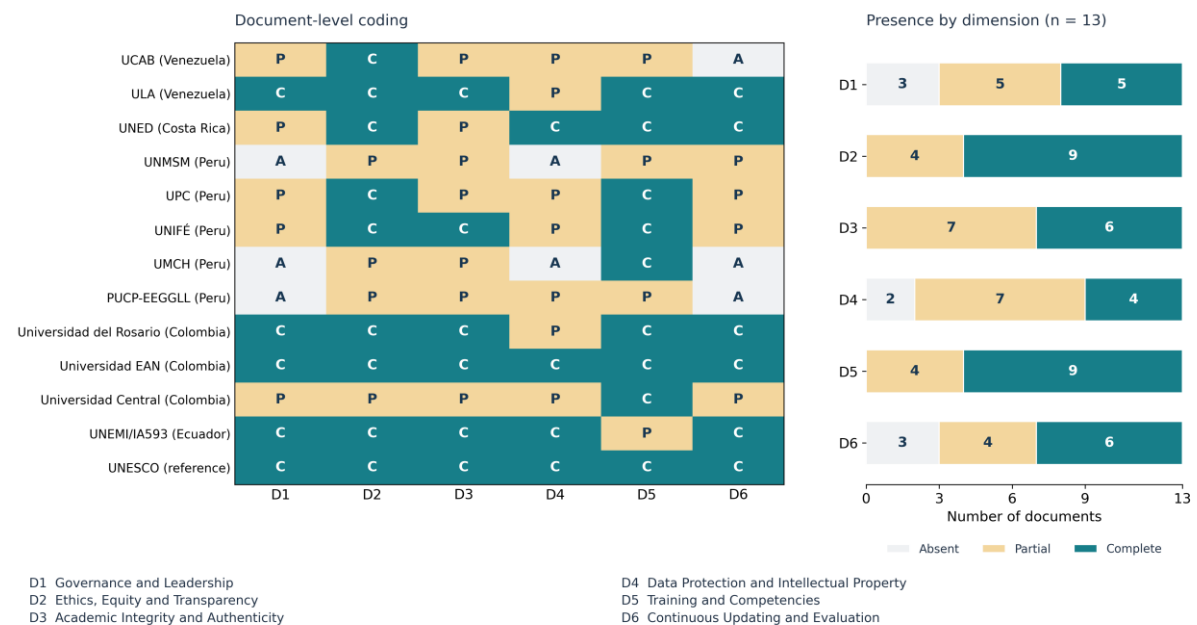
Dimension D5. Training and Competencies

Eleven institutions (P or C) cover this dimension, making it the only one in the corpus without absences. Two institutions (UCAB, IA593) simply refer to it without operationalization. UNED has trained approximately 180 clients in GenAI literacy, while UMCH has 78% institutional program compliance among teaching staff. Universidad EAN has a four-level training plan with evaluation measures (basic, intermediate, advanced, expert). UPC sets an annual schedule with faculty accountable parties. ULA has an undergraduate critical literacy program. The primacy of training in UNESCO's (2024) seven-step process and Latin American institutions' mimetic isomorphic pressure explain this dimension's consistency.

Dimension D6. Continuous Updating and Evaluation

Five institutions (ULA, UNED, IA593/UNEMI, UNESCO, Universidad del Rosario, Universidad EAN) are complete, five incomplete, and three absent. They are the corpus's least developed dimension. Universidad EAN institutionalizes this dimension with triennial Regulation reviews, impact metrics, and technical adaption mechanisms. University-led ULA reviews occur biennially. Other institutions discuss upgrading to advances without frequency or mechanism. Latin America lacks international frameworks like the European AI Act (Pires et al., 2025) and budgetary limits that prevent continuous monitoring (Nougrères, 2023) making this aspect structurally weak.

Figure 4. Comparative analysis of the six dimensions of AI governance



Note. Own elaboration.

4.4. Synthesis of findings by dimension

Table 6. Synthesis of findings by dimension with textual evidence and reference institution.

Dimension	Main finding	Example textual evidence	Reference institution
D1. Governance and Leadership	Heterogeneity: from total absence to specialized committees	“CEIA, Observatory, Technical Committee”	ULA

	with budgets and sanctioning functions.		
D2. Ethics, Equity and Transparency	Most developed dimension: 10/13 institutions with complete presence, due to UNESCO influence.	“Ten ethical principles” / “Seven principles”	EAN / Universidad del Rosario
D3. Academic Integrity	Polarization: 6 complete, 4 partial, 3 absent; critical gap between declaration and operationalization.	“Six types of declaration”	EAN
D4. Data Protection and IP	Bimodal pattern: 4 complete, 5 partial, 4 absent; unequal linkage with national legal frameworks.	“Law 1581 of 2012 (Colombia)”	EAN
D5. Training	Most homogeneous dimension: 11 institutions with presence (P or C); only one without total absences.	“180+ beneficiaries” / “78% teaching staff”	UNED / UMCH
D6. Updating	Least developed dimension: 5 complete, 5 partial, 3 absent; absence of supranational frameworks equivalent to the European AI Act.	“Review every three years”	EAN

Note. Own elaboration based on comparative documentary analysis. The textual evidence corresponds to literal fragments from the institutional documents analyzed.

5. Discussion

Having established the results, this section discusses them in light of the incomplete-transition thesis, considering plausible counterarguments and articulating the implications for regional university policy.

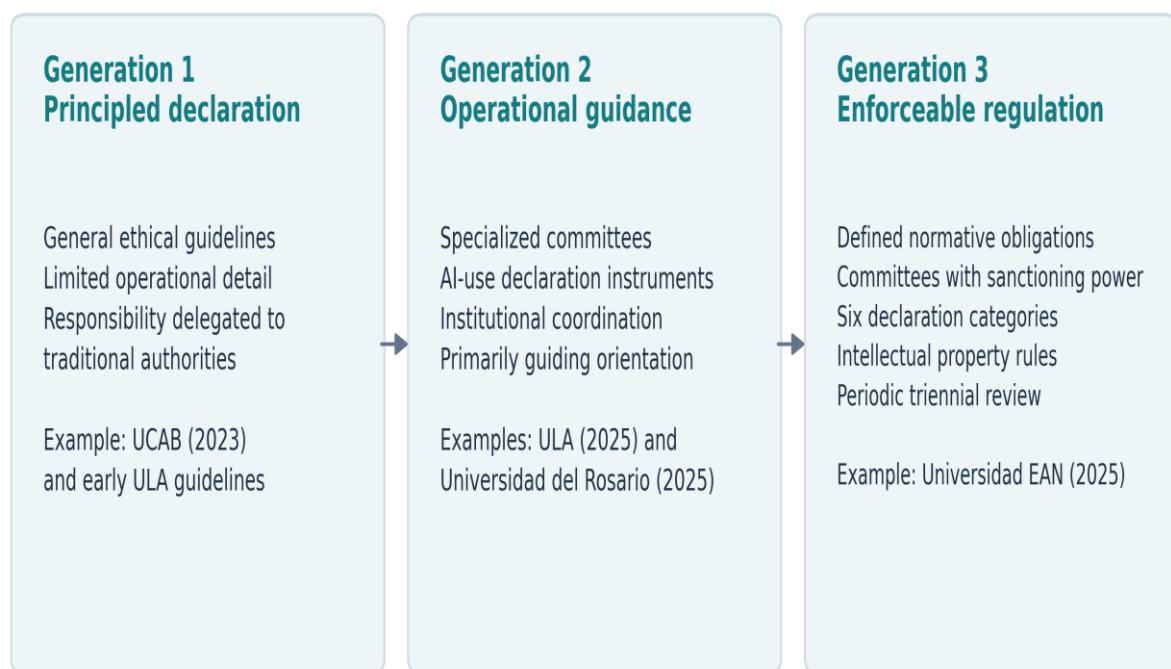
5.1. Emerging typology: three generations of institutional AI policies

The results distinguish three generations of AI regulation policies in Latin American universities, each with a varied presence across the six analytical model dimensions. The first generation, illustrated by the UCAB Rectoral Decree (2023) and the Venezuelan Universidad de los Andes' first guidelines, is characterized by declarative ethical principles with little concreteness. Functionality is delegated to later developments. These policies are fully present in D2 (Ethics) and partially present in the other dimensions, indicating a first principled institutional response to ChatGPT.

Second-generation recommendations from Universidad del Rosario (2025) and ULA (2025) include operational institutions like specialist committees and instruments for declaring AI use, but they are more guiding and institutional than penalizing. These policies establish an intermediate paradigm between principled declaration and rigorous operationalization by achieving entire presence in D1, D2, D3, and D6, and partial presence in D4 and D5. The

third generation, the Universidad EAN Integrity Regulation (2025), includes conceptual definitions, intellectual property rules, sanctioning committees, six-category use-declaration protocols, and parameters for periodic triennial updating. This typology provides a roadmap for Latin American institutions moving from first to third generation.

Figure 5. Emerging typology and regional patterns



Note. Own elaboration.

5.2. Three critical gaps between ethical declaration and operationalization

The study found three major Latin American university AI policy shortcomings. First-generation organizations delegate to traditional authorities without roles, while third-generation frameworks govern specialized committees with functions, budgets, and sanctioning power. Academic vice-rectorates and deanships struggle to handle GenAI's constant transformation capacity than a funded committee.

Scientific honesty versus established operational tools. Only ULA, IA593/UNEMI, Universidad EAN, and Universidad del Rosario had required

AI use rules with standardized categories and formats. In written product assessments and undergraduate or postgraduate final projects, their absence at other universities reduces assistance authorship and exponentially increases plagiarism and academic fraud. Only five institutions achieve corpus' weakest dimension, normative sufficiency in ongoing examination. Third and most crucial gap. As generative AI evolves rapidly without periodic evaluation, rigid frameworks endanger policy legitimacy and sustainability. South American law is weaker than the European AI Act, which requires biennial reviews (Pires et al., 2025).

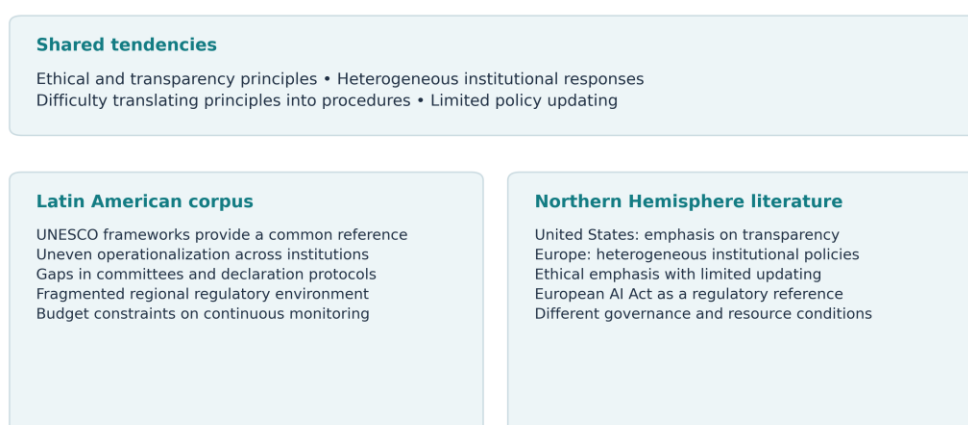
Figure 6. Critical gaps identified in the analyzed corpus

Note. Own elaboration.

5.3. Contrasts with the Northern Hemisphere

Several similarities and differences exist with the Northern Hemisphere (Andrade-Hidalgo et al., 2025; Azevedo, 2026). Alba et al. (2026) and LaFrance (2026) argue U.S. colleges are transparent, while Humble (2025) finds ethical variation but little updating in Europe. In the absence of strong national legislation (Wimmer, 2022), UNESCO frameworks (2021, 2024) enable principle declaration rather than operationalization, resulting in 10 of 13 Latin American organizations having full ethical dimension (D2).

Without supranational frameworks like the European AI Act (Pires et al., 2025) and budgetary limits that impede continual monitoring, update (D6) has just 5 of 13 institutions. Interpretive causality, unusual in previous investigations, suggests structural inequities and technology speed outpacing regulation updates (Dabis & Csáki, 2024). Buele et al. (2025) analyze 13 Ecuadorian institutions and find regional patterns—ethics is most developed and updating least. Ospina-Deaza and Gutiérrez-Pinzón (2026) say Colombian institutions are ungoverned to well managed.

Figure 7. Similarities and differences with the Northern Hemisphere

Note. Own elaboration.

5.4. Implications for regional university policy

Rising typology hinders regional university policy in three ways. UNESCO's seven-step (2024) approach requires budgeted, duty-filled committees to migrate from first- to third-

generation policy. To close the academic integrity gap, define usage categories and standardize declaration forms using the Universidad EAN (six categories) or ULA (type-function-scope) model. Third, without supranational frameworks like the European AI Act, frequent reviews with defined frequency and impact-assessment mechanisms must be institutionalized to close the update gap.

Fourth, pioneering institutions like EAN, ULA, and Universidad del Rosario and policy-free universities need each other to share best practices and unite the region. UNESCO-IESALC and regional accreditation bodies (RIACES, INQAAHE) may form a Latin American GenAI governance committee network to address gaps. Fifth, Latin America's technological dependence and absence of a homogeneous international legal framework complicate regulatory dynamics, requiring independent external audits that avoid hyperbole and evaluate institutional practices.

5.5. Assessing opposition

To analyze our findings, we need three convincing counterarguments to the incomplete-transition theory. Institutional resource availability, rather than regional evolution, may challenge the three-generation typology by dividing pioneering and running organizations. The alternative argument cannot explain why UNMSM and UPC, two Peruvian agencies with comparable budgets, have differing institutionalization levels, proving regulatory trajectory is independent of monetary resources.

Latin American structural variables overstate regional variety; therefore, colleges worldwide struggle to operationalize ethics (Humble, 2025; Mccusker & Michalak, 2025). The Global North lacks it partly. International frameworks like the European AI Act (Pires et al., 2025) and structural financial limits (Nougrères, 2023) are lacking in Latin America, supporting regional classification without challenging global elements.

Finally, documentary analysis cannot quantify effective governance since formal policies may be rationalized myths (Meyer & Rowan, 1977) without a practical equivalent. The study's emphasis on documentation formalization over implementation supports this conclusion. Given this documentary approach constraint, we focus on formal governance and leave field research to compare norms and practice. Documentary, failed, and institutional and national context-dependent imperfect transitions weaken our findings.

6. Limitations of the study

After discussing the findings and counterarguments, this section analyzes the study's Five study limitations. First, accessibility bias from documentary sampling: the corpus only includes formal and publicly recorded norms, overrepresenting prestigious universities and underrepresenting emerging responses. Peru (5) and Colombia (4) limit regional applicability, especially for large university systems like Brazil, Argentina, Chile, and Mexico with unstudied policies.

Third, classroom, lab, and exam policy implementation is documented. Statutory implementation is uncertain. Fourth, 2023–2026 is early in technological use, and articles may have changed while coding, making technology study temporally ambiguous. Fifth, UNESCO and the IA593 Framework add variety, not university requirements. Although justified as a shared normative reference, their inclusion should be addressed when evaluating aggregated results.

To avoid prejudice, researchers consulted institutional libraries and top university AI policy experts. Expanding findings to growing framework countries requires external validity. As technology advances exponentially, new policies in Brazil, Argentina, Chile, and Mexico should be investigated utilizing documentary and field methods (authority interviews, AI committee participant observation, and minutes and resolutions). Over time, studies

Small colleges or those that have not revealed their AI policy may have missed institutional laws. Future study should combine documentation searches with direct surveys of rectorates, academic vice-rectorates, rectors' networks, and regional university associations to find policies not listed in institutional repositories. Valid regulatory diversity that respects institutional trajectories and conditions without normative convergence toward a single regional model may incorporate significant regional variety. This is possible, but it ignores the systemic risk first-generation schools' unauditable approach poses to the region, especially in reciprocal degree recognition and academic mobility.

7. Conclusions and future directions

The research compared thirteen institutional policy documents from Latin American universities on generative AI using a six-dimensional analytical matrix derived from the international frameworks UNESCO (2021, 2024), RAFTS (Mccusker & Michalak, 2025), and Coates et al. (2025), with substantial inter-rater agreement (Cohen's Kappa = 0.78). The research supports four primary findings that meet the introduction's four aims.

First, the thirteen institutional policies show a progression from basic, mostly ethical, and poorly instrumented rules (first generation) to more sophisticated, precise rules with governance committees, mandatory use-declaration protocols, and systematic review (third generation). The six-dimensional analytical matrix is a linear, evolutionary, and prescriptive model that can help colleges improve their internal policies.

Second, three critical gaps limiting regional normative impacts on universities were identified: governance (nominal designation of authorities versus actual formation of specialized committees with budgets); academic integrity (general ethical declaration versus specific

instrumental design for classroom accountability); and periodic review (the most undefined dimension of the analyzed corpus, exceeding the temporal plausibility of the corpus).

Third, compared to the Northern Hemisphere, Latin America is institutionalizing regulation faster, but without a homogeneous supranational legal framework like the European AI Act and with technological dependence that complicates regulatory dynamics. Instead of rhetoric, regulatory design frameworks and independent external audit systems must be collaborative across universities. Regional transfer references include EAN, ULA, and Universidad del Rosario, which have overcome this challenge.

Fourth, this study presents the first systematic comparative analysis of AI policies in Latin American universities, with an evolutionary three-generation typology; a six-dimensional analytical model with operationalizable sub-indicators and substantial inter-rater agreement, transferable for institutional self-assessment and regional benchmarking; and three critical gaps that guide the

Four potential research directions are suggested. First, include new policies in Brazil, Argentina, Chile, and Mexico (Velázquez-Ramos et al., 2026) to increase regional representation. Second, supplement the documentary technique with field investigations (interviews with AI committee officials, teacher and student surveys, collegiate body participant observation) to verify rule-practice distance. Third, conduct annual or biennial longitudinal studies to track these policies' progress as technology advances exponentially. Fourth, compare university policies to emerging national frameworks (Brazil's AI Law, legislative initiatives in Chile, Argentina, Peru, and Colombia) to document regional institutional-national convergence or divergence.

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Appendix A. Codebook

This appendix guarantees the auditability and replicability of the study. For each dimension of the analytical model, the following are defined: (a) operational definition, (b) sub-indicators, (c) coding rules (0 = absent, 1 = partial, 2 = complete), and (d) textual examples extracted from the corpus.

Table A.1. General coding scale

Code	Criterion
0 — Absent	No explicit references or development of the dimension.
1 — Partial	Declarative or principled mention, without verifiable mechanisms or responsible persons.
2 — Complete	Operational definition, responsible persons, mechanisms, and verifiable legal framework.

Note. Gradual system for capturing the transition from declaration to operationalization.

A.2. Decision rules by dimension

D1. Governance and Leadership (authority, committees, processes): 0 = no mention; 1 = authority mentioned without committees or processes; 2 = designated authority, specialized committee with verifiable functions and processes. Example: ULA CEIA.

D2. Ethics, Equity and Transparency (principles, equity, algorithmic transparency): 0 = no mention; 1 = general principles without mechanisms; 2 = explicit principles, measures against bias, and verifiable mechanisms. Example: ten principles of Universidad EAN.

D3. Academic Integrity (authorship, AI declaration, plagiarism): 0 = not addressed; 1 = general mentions without format or consequences; 2 = regulation of augmented authorship, detailed declaration, and plagiarism prevention. Examples: EAN (6 categories) and ULA (type, function, scope).

D4. Data Protection and IP (privacy, IP, legal frameworks): 0 = not addressed; 1 = general mentions without legal link; 2 = specific rules with national frameworks (Law 1581 of 2012, Law 29733 of 2011, Law 8968 of Costa Rica, LOEPD of Ecuador). Example: EAN with Law 1581.

D5. Training (teacher training, student literacy, competencies): 0 = no actions; 1 = need mentioned without concrete plans; 2 = programs with responsible persons, metrics, or schedules. Examples: UNED (180+ beneficiaries) and UMCH (78% of teaching staff).

D6. Updating (periodic review, impact assessment, adaptation): 0 = no provision; 1 = need mentioned without periodicity; 2 = review with periodicity, indicators, and adaptation. Example: EAN (triennial review).

A.3. Application protocol

Coding was applied through the following six-step protocol: (1) complete reading of the document by two independent coders; (2) extraction of literal textual fragments relevant to each sub-indicator; (3) independent assignment of code 0, 1, or 2 to each dimension by each coder; (4) comparison of codings, identification of disagreements, and reasoned discussion to reach consensus; (5) recording of the initial disagreement, the resolution argument, and the final code; (6) calculation of inter-rater agreement using Cohen's Kappa (value obtained: 0.78, substantial agreement according to the thresholds of Landis and Koch, 1977).

Table A.2. Detailed coding rules by dimension

Dimension	Code 0	Code 1	Code 2
D1. Governance	No mention	Authority without committees	Authority + committee + processes (CEIA-ULA)
D2. Ethics	No mention	General principles	Explicit principles + measures (EAN)
D3. Integrity	Not addressed	Mentions without format	Augmented authorship + declaration (EAN/ULA)
D4. Data and IP	Not addressed	General mentions	Rules + legal frameworks (EAN-Law 1581)
D5. Training	No actions	Need without plan	Programs with metrics (UNED/UMCH)
D6. Updating	No provision	Need without periodicity	Review + indicators (EAN triennial)

Appendix B. Detailed documentary corpus

This appendix lists the thirteen documents comprising the analyzed corpus, with their complete bibliographic identification. References in APA 7 format are included in the Bibliographic References section. The abbreviations correspond to: UCAB (Universidad Católica Andrés Bello); ULA (Universidad de Los Andes); UNED (Universidad Estatal a Distancia); UNEMI (Universidad Estatal de Milagro); UNIFÉ (Universidad Femenina del Sagrado Corazón); UNMSM (Universidad Nacional Mayor de San Marcos); UPC (Universidad Peruana de Ciencias Aplicadas); UMCH (Universidad Marcelino Champagnat); PUCP-EEGLL (Pontificia Universidad Católica del Perú - Escuela de Estudios Generales Letras, Lenguas y Literatura); U. EAN (Universidad Ean); U. Central (Universidad Central de Colombia); U. Rosario (Universidad del Rosario); IA593 (IA593 Framework for Ecuador); UNESCO (international reference organization).