



U.S. General Services Administration

Artificial intelligence compliance plan

Our AI compliance plan is our response to comply with the Office of Management and Budget, or OMB, Memorandum M-24-10.

September 2024

1. Strengthening AI governance

2. Advancing responsible AI innovation

3. Managing risks from the use of AI

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General

Describe any planned or current efforts within your agency to update any existing internal AI principles, guidelines, or policy to ensure consistency with M-24-10.

On June 7, 2024, GSA released the [Use of Artificial Intelligence \(AI\) at GSA Directive \(2185.1A CIO\)](#), which established its AI policy from the mandates and guidance set forth from OMB's [Advancing Governance, Innovation, and Risk Management for Agency Use of AI \[PDF\]](#) memo (M-24-10). GSA's directive established the governing policies for the controlled access and responsible use of AI technologies and platforms. It addressed the assessment, procurement, usage, monitoring, and governance of AI systems and software within GSA's network, in conjunction with existing security, privacy, policies, directives, ethics regulations, and laws. With 2185.1A CIO, GSA will ensure its guidelines address critical issues such as bias mitigation, transparency, accountability, and the ethical use of AI.

Prior to the release of M-24-10, GSA had in place policy specific to generative AI (Security Policy for Generative Artificial Intelligence (AI) Large Language Models (LLMs) (Number: CIO IL-23-01)). This policy was canceled by the AI Directive ([2185.1A CIO](#)), which expanded upon the controls set out in CIO IL-23-01, and ensured GSA was in full alignment with M-24-10. Additionally, miscellaneous policies including GSA's privacy assessments, authority to operate (ATO) policies, and general IT policies have been reviewed for consistency with M-24-10.

GSA will conduct annual reviews and assessments of 2185.1A CIO to ensure the mandates set forth in M-24-10 are maintained as AI capabilities continue to evolve. The Chief Artificial Intelligence Officer (CAIO) will lead these reviews with the support of the AI Governance Board and AI Safety Team. Updates to 2185.1A CIO and other relevant policies will be rolled out as-needed and are not restricted to an annual update.

AI Governance Bodies

Identify the offices that are represented on your agency's AI governance body.

GSA's AI governance structure is composed of two bodies: the AI Governance Board and the AI Safety Team. The AI Governance Board is an executive-level team chaired by the Deputy Administrator and co-chaired by the CAIO. The board provides top-level oversight and strategic leadership in AI-related decisions and includes principals from across GSA:

- Chief Information Officer (CIO)
- Chief Information Security Officer (CISO)
- Chief Privacy Officer (CPO)
- Chief Technology Officer (CTO)
- Federal Acquisition Service (FAS) Deputy Commissioner or Designee

- Public Buildings Service (PBS) Deputy Commissioner or Designee
- Technology Transformation Services (TTS) Director
- Office of Small and Disadvantaged Business Utilization (OSDBU) Associate Administrator
- Chief Acquisition Officer (CAO) or Designee
- Chief Financial Officer (CFO)
- Office of Strategic Communication (OSC) Associate Administrator
- Performance Improvement Officer (PIO)
- Chief Diversity and Inclusion Officer (CDIO)
- Office of Civil Rights (OCR) Associate Administrator
- Chief Human Capital Officer (CHCO)
- General Counsel or Designee
- Office of Customer Experience (OCE) Chief Customer Officer (CCO)
- Evaluation Officer (EO)
- Statistical Official (SO)

The AI Governance Board is responsible for fulfilling its duties under [Executive Order 14110 \[PDF\]](#) and the guidance of M-24-10, which includes monitoring cross-agency AI priorities by shaping GSA's AI Strategic Plan and identifying the necessary resources to implement those priorities. The board also prioritizes AI capabilities across the agency, identifying gaps, duplications, and overlaps in AI efforts, and defines cost-effective AI solutions based on established criteria, policies, and processes.

Additionally, the AI Governance Board will coordinate with AI system owners to strengthen strategic planning and risk management efforts. The board is tasked with setting agency-wide AI policies in a manner that supports, but does not override, the statutory authority of existing roles. It will establish risk tolerance thresholds and manage a portfolio of AI use case risks that align with GSA's mission.

As part of its governance responsibilities, the board will review and make decisions on all safety-impacting and rights-impacting AI use cases. It will also create and oversee working groups, such as the AI Safety Team, to address AI governance issues, set priorities, and manage AI use cases that further supports GSA's mission. Finally, the AI Governance Board will assist the CAIO in ensuring that the agency complies with regulations and guidance under Executive Orders 13859, 13960, 14091, 14110, and M-24-10.

The AI Safety Team focuses on the implementation and monitoring of AI systems to ensure their safe and ethical use. The AI Safety Team is chaired by the CAIO and consists of representatives from the offices of each principal member of GSA's AI Governance Board.

The Safety Team works under the guidance of the AI Governance Board and is technically oriented, concentrating on identifying potential risks, managing AI-related security concerns, and conducting internal audits. The AI Safety Team is responsible for ensuring that AI systems are transparent, accountable, and, where known, biases are understood and accounted for, with an emphasis on compliance with GSA's privacy and security protocols. While the Governance Board sets the policy direction and risk thresholds, the AI Safety Team ensures GSA adheres to those policies.

The AI Safety Team's roles and responsibilities include:

- Reviewing and evaluating proposed AI use cases, including criteria for assessing feasibility, benefits, risks, and compliance with ethical standards and legal requirements.
- Engaging with relevant stakeholders, including internal departments, external partners, and users, to gather input, address concerns, and ensure buy-in for proposed AI use cases.
 - The CAIO assigns a Safety Team member as steward for every use case.
 - The steward is responsible for summarizing the proposal in their own words and presenting the use case to the rest of the Safety Team.
- Conducting thorough risk assessments to identify potential risks associated with AI use cases, such as data privacy concerns, algorithmic biases, security vulnerabilities, and unintended consequences.
- Promoting transparency and accountability in the AI approval process by documenting decisions, rationale, and potential risks associated with approved use cases.
- Assessing the ethical implications of proposed AI integration use cases, including considerations of fairness, transparency, accountability, and the protection of individual rights and privacy.

- Ensuring that proposed AI integration use cases comply with relevant laws, regulations, and industry standards governing AI technologies, data protection, privacy, and security.
- Conducting technical evaluations of proposed AI integration use cases to assess their feasibility, scalability, performance, and compatibility with existing systems and infrastructure.
- Making informed decisions regarding the approval or rejection of AI integration use cases based on comprehensive evaluations of their feasibility, benefits, risks, ethical considerations, stakeholder input, and compliance with organizational policies and legal requirements.
- Generating regular reports on approved AI use cases and their implementation status for internal review and external reporting purposes.

These governance bodies promote the ethical use of AI, enhance operational efficiency, and support the continued development of GSA's AI policy framework. The Governance Board oversees the adjudication of AI into mission-critical systems - explicitly rights-impacting or safety-impacting use cases, while the AI Safety Team ensures compliance and risk management for all AI use cases.

Describe how, if at all, your agency's AI governance body plans to consult with external experts as appropriate and consistent with applicable law.

GSA has and will continue to collaborate with external experts, including academic institutions, state governments, and other federal agencies to develop training programs and benchmark its updated AI policies against best practices in the field. Members of the AI Governance Board and AI Safety Team regularly engage with interagency groups and councils, including the CDO council, the CAIO council, the Chief Human Capital Officer (CHCO) council, the Office of Personnel Management (OPM), the AI Talent Task Force, and the three interagency working groups coordinated by the CAIO council on generative AI, AI-related acquisitions, and AI risk management.

External consultation will continue to play a critical role in both governance and safety efforts. The AI Governance Board plans to consult with external experts as appropriate and consistent with applicable law. This consultation may include input from Federally Funded Research and Development Centers, academic institutions, think tanks, and industry experts to stay informed about AI's latest trends, risks, and best practices. Civil society organizations, labor unions, and similar groups may also be consulted to ensure that AI systems meet public interest standards and consider workforce impacts.

AI Use Case Inventories

Describe your agency's process for soliciting and collecting AI use cases across all sub-agencies, components, or bureaus for the inventory. In particular, address how your agency plans to ensure your inventory is comprehensive, complete, and encompasses updates to existing use cases.

GSA's process for soliciting and collecting AI use cases across the organization is led by the CAIO. The CAIO is responsible for ensuring that the AI use case inventory is comprehensive and up to date, with the support of the AI Safety Team, various program offices, and the OCIO.

The process begins with the issuance of an annual request to all offices, requiring them to submit information on current and planned AI systems. Each office must identify all AI applications, regardless of the size or scope of the system. The CAIO provides and maintains standardized guidelines and templates for reporting in compliance with OMB standards. The centralized submission process is used to collect and manage AI use cases, allowing offices to submit their entries in a consistent and structured manner. All offices participate in this process and regularly update their entries to reflect any changes, such as new AI capabilities, updates to existing systems, or the decommissioning of older technologies.

The CAIO oversees periodic reviews and audits to maintain the inventory's accuracy and completeness. The CAIO also coordinates within the OCIO organization so that existing processes like ATOs, Federal Information Technology Acquisition Reform Act reviews, and new software requests can identify AI instances across the enterprise. This process ensures that GSA's AI inventory remains accurate and fully reflects the agency's ongoing use of AI technology. This approach, led by the CAIO, provides a comprehensive and complete inventory of AI use cases that support the agency's governance and decision-making processes regarding AI deployment.

Reporting on AI Use Cases Not Subject to Inventory

Describe your agency's process for soliciting and collecting AI use cases that meet the criteria for exclusion from being individually inventoried, as required by Section 3(a)(v) of M-24-10.

GSA has not identified any AI use cases that are not subject to inventory.

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Last updated: Sep 24, 2024