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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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### Determining Which Artificial Intelligence Is Presumed to Be Safety-Impacting or Rights Impacting

**Explain the process by which your agency determines which AI use cases are rights- impacting or safety-impacting. In particular, describe how your agency is reviewing or planning to review each current and planned use of AI to assess whether it matches the definition of safety-impacting AI or rights-impacting AI, as defined in Section 6 of M-24-10.**

**Identify whether your agency has created additional criteria for when an AI use is safety-impacting or rights-impacting and describe such supplementary criteria.**

GSA has adopted the definitions and standards of rights-impacting and safety-impacting set out by M-24-10. GSA established a review process that determines which AI use cases are rights-impacting or safety-impacting by following a structured process outlined in the AI governance framework (2185.1A CIO). The AI Safety Team reviews each AI use case to assess potential impacts on safety or individual rights, as defined in Section 6 of M-24-10. The Safety Team then provides an adjudication recommendation to the AI Governance Board for final review and sign-off. This review evaluates whether an AI application involves decision-making affecting public health, safety, privacy, or civil liberties. This review process includes analyzing the data being used, the intended outcomes, and any potential for bias or harm. For safety-impacting or rights-impacting AI, GSA has not yet developed additional criteria beyond those specified in M-24-10 but plans to reassess regularly as AI use and its capability evolves.

**If your agency has developed its own distinct criteria to guide a decision to waive one or more of the minimum risk management practices for a particular use case, describe the criteria.**

GSA has not developed a distinct criteria in guiding the decision to waive minimum risk management practices. Describe your agency's process for issuing, denying, revoking, tracking, and certifying waivers for one or more of the minimum risk management practices.

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For the issuance of waivers, the CAIO, in coordination with other relevant officials, may waive one or more of the required minimum practices for rights-impacting or safety-impacting use cases involving a specific AI application or component, following a written determination. The waiver process involves submitting a formal request to the AI Governance Board, which includes a risk assessment and review of the specific system and context. The waiver will be considered for approval should the assessment find that meeting the requirement would increase overall risks to safety or rights or impose an unacceptable barrier to critical agency operations. If the board and CAIO approves, waivers will be reported to OMB within 30 days of issuance, tracked, and routinely reviewed to ensure compliance with agency standards. GSA maintains a certification process to confirm that AI systems granted waivers continue to meet risk management requirements, and the CAIO may revoke waivers if any noncompliance or unforeseen risks emerge. GSA has not issued a waiver at the time of this compliance plan's publication.

### **Implementation of Risk Management Practices and Termination of Non-Compliant AI**

**Elaborate on the controls your agency has put in place to prevent non-compliant safety impacting or rights-impacting AI from being deployed to the public. Describe your agency's intended process to terminate, and effectuate that termination of, any non-compliant AI.**

GSA has implemented several controls to prevent non-compliant, safety-impacting, or rights-impacting AI from being deployed to the public. Safeguards include the review of AI use cases by the AI Governance Board, confirming all AI systems meet ethical, legal, and technical standards before deployment. The board evaluates risks related to public safety, privacy, civil liberties, and potential biases, with specific attention to AI systems that may have significant impacts on rights or safety.

To prevent non-compliant AI from being deployed, GSA has established continuous monitoring protocols that track AI system interactions at the network level. GSA is developing a strategy to increase its capacity to monitor AI system behaviors and performance. Automated alerts and reporting systems are in place to detect deviations from compliance standards, triggering an immediate review by relevant oversight bodies.

If an AI system is found to be non-compliant after deployment, GSA has developed a defined process for termination. The AI Governance Board, in collaboration with the OCIO, will issue a termination order. The termination process involves revoking system access, ceasing operations, and ensuring that data processed by the AI system is secured, maintained, or destroyed as required. An incident response team coordinates the shutdown and conducts a post-termination review to assess the impact and identify corrective actions. Additionally, communications will be made regarding use-case terminations, the reasons for the action, and any steps being taken to prevent future issues.

### **Minimum Risk Management Practices**

**Identify how your agency plans to document and validate implementation of the minimum risk management practices. In addition, discuss how your agency assigns responsibility for the implementation and oversight of these requirements.**

GSA policy mandates that AI use cases document and validate the implementation of minimum risk management practices as defined in M-24-10 for AI systems through a comprehensive framework managed by the AI Governance Board. This process includes detailed documentation at each stage of the AI lifecycle, from development and testing to deployment and monitoring. AI use cases are required to maintain thorough records of risk assessments, compliance checklists, data usage audits, real-world testing, and ethical impact evaluations. These documents will be stored in a centralized repository that is accessible to the AI Safety Team and AI Governance Board.

GSA will conduct periodic audits and performance reviews of AI systems to validate that the minimum risk management practices are being followed. These audits assess compliance with federal guidelines, including data privacy, bias mitigation, and ethical considerations. Additionally, GSA employs automated monitoring tools to track ongoing compliance, and discrepancies trigger immediate reviews by oversight teams.

Responsibility for implementing and overseeing these risk management practices is clearly assigned to multiple levels within the organization. The AI Governance Board provides strategic oversight and policy guidance, and supports the AI Safety Team in ensuring all AI initiatives comply with legal and ethical standards. The OCIO is responsible for the technical implementation and monitoring of AI systems. Individual project managers and teams are tasked with day-to-day compliance, including adhering to risk management protocols, conducting regular risk assessments, and reporting any issues to the AI Governance Board.

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Last updated: Sep 24, 2024