



U.S. Agency for International Development (USAID) Compliance Plan for OMB Memorandum M-24-10 Version: September 2024

1. STRENGTHENING AI GOVERNANCE

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.

USAID has issued AI guidance aligned with OMB Memo M-24-10 and EO 14110. Key resources include the 2022 [Artificial Intelligence Action Plan](#), which informs USAID's approach to responsible AI in programming and global operations, the [USAID Digital Policy 2024-2034](#), and a guide for Managing Machine Learning Projects in International Development. Additional materials cover Large Language Models (LLM) and Generative AI (GenAI). Forthcoming guidance includes the [AI Global Development Playbook](#) and the [Global AI Research Agenda](#). See usaid.gov/digital-development/artificial-intelligence for additional information and resources about USAID and AI.

AI Governance Bodies

Identify the offices that are represented on your agency's AI governance body. Describe the expected outcomes for the AI governance body and your agency's plan to achieve them. Describe how, if at all, your agency's AI governance body plans to consult with external experts as appropriate and consistent with applicable law. External experts are characterized as individuals outside your agency, which may include individuals from other agencies, federally funded research and development centers, academic institutions, think tanks, industry, civil society, or labor unions.

USAID's AI Governance Body is the Council on AI (CAI). The CAI is a critical venue to guide the transformative and safe use of AI across policy, programs and operations within USAID. It held its inaugural meeting in July 2024. The CAI currently has ex officio members from USAID's Front Office; Bureau for Management; Bureau for Inclusive Growth, Partnerships, and Innovation; Bureau for Democracy, Human Rights, and Governance; Office of the Chief Economist; Office of General Counsel; Office of the Inspector General; Office of Civil Rights; and Office of Policy. In addition to these Bureaus and Offices, the CAI has organizational voting members from the Bureau for

Humanitarian Assistance; Bureau for Resilience, Environment, and Food Security; Bureau for Global Health; Bureau for Conflict Prevention and Stabilization; Bureau for Planning, Learning, and Resource Management; Bureau for Africa; Bureau for Asia; Bureau for Europe and Eurasia; Bureau for Middle East; Bureau for Latin America and the Caribbean; and Office of Small and Disadvantaged Business Utilization.

The CAI Charter is currently in draft form, and considers how the CAI will contribute to the development of USAID's overarching vision, strategy, and direction for AI in development and humanitarian assistance as well as internal operations. The draft CAI Charter does not yet include plans for consultation with external experts.

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.

USAID will distribute a survey Agency-wide to identify current AI deployments. Once potential AI use cases are identified, staff will gather responses to the OMB AI Use Case Inventory Questions for each case. USAID will use existing programmatic and operational processes to integrate AI and streamline the identification and categorization of new and existing use cases.

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. In particular, explain the process by which your agency determines whether a use case should be excluded from being individually inventoried and the criteria involved for such a determination.

Identify how your agency plans to periodically revisit and validate these use cases. In particular, describe the criteria that your agency intends to use to determine whether an AI use case that previously met the exclusion criteria for individual inventoring should subsequently be added to the agency's public inventory.

USAID will assess AI use cases based on the AI Use Case Inventory Questions outlined by OMB, along with applicable laws and policies. Exclusions will be addressed on a case-by-case basis. In line with OMB guidance, USAID will annually report its AI Inventory and validate use cases as part of this process.

2. ADVANCING RESPONSIBLE AI INNOVATION

AI Strategy

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.

USAID recognizes the significant potential for responsible and safe AI to enhance development and humanitarian goals. As a leading international development donor, USAID prioritizes the rights-driven, responsible use of digital technologies and data. In using AI, USAID acknowledges both its benefits and risks, as outlined in Executive Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government*. USAID recognizes the importance of implementing safeguards, investing in relevant talent, and understanding how AI fits within the broader digital ecosystem and its stakeholders. USAID also collaborates with digital rights experts to determine when AI should not be used and to address rights-infringing applications of AI by others.

AI's ability to analyze and act on data aligns with the development community's goal of becoming more data-driven and innovative, even in contexts of data scarcity or fragmented systems. From AI-enabled health chatbots to satellite imagery for disaster response and generative AI applications, AI has the potential to increase efficiency, productivity, and service reach, as well as empower communities in certain contexts.

USAID will develop an AI strategy that builds on the goals of the existing AI Action Plan and Digital Policy. This strategy will promote responsible AI use in programming and operations, strengthen digital ecosystems to support AI, and contribute to shaping a global agenda for responsible AI in development.

Removing Barriers to the Responsible Use of AI

Describe any barriers to the responsible use of AI that your agency has identified, as well as any steps your agency has taken (or plans to take) to mitigate or remove these identified barriers.⁶ In particular, elaborate on whether your agency is addressing access to the necessary software tools, open-source libraries, and deployment and monitoring capabilities to rapidly develop, test, and maintain AI applications.

USAID has identified and is addressing certain challenges to responsible building of AI, including solutions for structured and unstructured data sources for testing and validating AI models. USAID is also exploring opportunities to sponsor the certification of Cloud Service Providers (CSPs) offering AI services, particularly Software as a Service (SaaS) and Large Language Models (LLMs) to address the challenge of limited providers in the FedRAMP marketplace. USAID is testing LLMs in its R&D sandbox

environment to better understand deployment challenges, as well as the capabilities and limitations of these models. Furthermore, USAID is piloting enterprise licenses for GenAI tools.

Identify whether your agency has developed (or is in the process of developing) internal guidance for the use of generative AI. In particular, elaborate on how your agency has established adequate safeguards and oversight mechanisms that allow generative AI to be used in the agency without posing undue risk.

In April 2024, USAID secured Federal Terms of Service for the use of ChatGPT, ensuring that staff using the publicly available tool are protected under special terms. USAID has stipulated that only publicly available data can be used with public Generative AI tools like ChatGPT that are not government-certified; internal, sensitive, or other restricted data is prohibited. In May, USAID issued internal guidance for the use of public Generative AI services, including approval for official use of ChatGPT. This guidance included a Q&A section clarifying allowed practices, references to policies related to data security and privacy, and user responsibilities.

In May 2024, USAID procured a limited number of Enterprise ChatGPT licenses for pilot purposes and is exploring pilot opportunities with other Generative AI providers. USAID follows a progressive, cautious approach to testing new technologies, prioritizing cyber, privacy, and ethical considerations to advance its development and humanitarian goals responsibly. This approach leverages a robust cybersecurity program that includes Data Loss Prevention, Endpoint Detection and Response tools, monitoring, threat detection and mitigation, and ongoing Zero Trust implementation to meet operational needs, industry best practices, and federal compliance.

AI Talent

Describe any planned or in-progress initiatives from your agency to increase AI talent. In particular, reference any hiring authorities that your agency is leveraging, describe any AI focused teams that your agency is establishing or expanding, and identify the skillsets or skill levels that your agency is looking to attract. If your agency has designated an AI Talent Lead, identify which office they are assigned to.

USAID has identified several AI-focused positions for U.S. Direct Hires and contract staff in key areas. These roles involve developing AI regulations, implementing AI solutions, accelerating research and development, creating and testing LLM prototypes and proof-of-concepts, training and upskilling Agency staff, providing technical support to Mission staff, and addressing cybersecurity and risk management.

If applicable, describe your agency’s plans to provide any resources or training to develop AI talent internally and increase AI training opportunities for Federal employees. In particular, reference any role-based AI training tracks that your agency is interested in.

USAID offers a 6-hour, instructor-led online training titled "Responsible AI in International Development." This training covers basic AI concepts, explores AI applications at USAID, assesses feasibility and risk in potential AI use, guides AI implementation in USAID programs, and outlines USAID’s guidance on generative AI. Since the release of EO 14110, this training has been conducted six times.

AI Sharing and Collaboration

Describe your agency’s process for ensuring that custom-developed AI code—including models and model weights—for AI applications in active use is shared consistent with Section 4(d) of M-24-10. Elaborate on your agency’s efforts to encourage or incentivize the sharing of code, models, and data with the public. Include a description of the relevant offices that are responsible for coordinating this work.

USAID currently maintains a standardized enterprise source code repository that enables staff to share code internally. The Agency is exploring options for a public-facing code repository to allow staff to share code with external individuals and organizations.

Harmonization of Artificial Intelligence Requirements

Explain any steps your agency has taken to document and share best practices regarding AI governance, innovation, or risk management. *Identify how these resources are shared and maintained across the agency.*

In September 2022, USAID released a set of internal AI Management Tools (AIM Tools) to assist activity managers, AORs, and CORs in designing AI projects. These tools provide practical guidance on issuing Requests for Information (RFIs), selecting vendors, mapping costs, assessing risks, and learning from other projects within the Agency. For example, USAID/Uganda used the AIM Tools to guide discussions with data science partners on managing risks in their AI project. The tools are available on an internal Agency website and are maintained by the Emerging Technologies team in the Bureau for Inclusive Growth, Partnerships, and Innovation. The team also offers the aforementioned 6-hour “Responsible AI in International Development” training, which promotes the AIM Tools to potential users across the Agency.

3. MANAGING RISKS FROM THE USE OF ARTIFICIAL INTELLIGENCE

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.

Currently, this determination is made during the annual use-case inventory process. USAID staff completing the inventory survey are asked to identify whether their AI use cases might be rights-impacting or safety-impacting, based on the definitions and examples in M-24-10. These responses are then reviewed by staff from M/CIO, including the CIO's Privacy Office, and the Bureau for Inclusive Growth, Partnerships, and Innovation, to ensure proper application of the M-24-10 criteria and that appropriate risk mitigation measures and privacy controls are in place.

USAID has not developed additional criteria and will use the OMB definitions of safety-impacting and rights-impacting AI. As new regulations are introduced, USAID will update its guidance accordingly.

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.

USAID has not developed distinct criteria to guide the decision for waiving one or more of the minimum risk management practices for use cases.

Describe your agency's process for issuing, denying, revoking, tracking, and certifying waivers for one or more of the minimum risk management practices.

Waivers will be considered only after the AI use case owner has answered all required questions and the team has engaged with the use case. Documentation must include, at a minimum, all OMB-required questions and answers, a written explanation from the business owner detailing why the requirements cannot be met, and the justification for the waiver. The justification must demonstrate that fulfilling the requirement would either increase overall risks to safety or rights or create an unacceptable impediment to critical

agency operations. Waivers will be reviewed annually, with use case owners providing updates on any changes. USAID has not issued any waivers to date.

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.

USAID will leverage existing business processes and policies, such as the Risk Management Framework (RMF) and FITARA, along with associated tools, to integrate the AI use case review process and ensure proper documentation of AI use cases. For non-compliant use cases, the first step will be to work with business owners to remediate any identified issues. If remediation is not possible, USAID will decide whether to grant an extension, issue a waiver, or remove the AI use case from operations. This decision will weigh the benefits and risks of discontinuing an active AI project. If termination of the non-compliant AI is required, USAID can use several pathways, including through the RMF, a Denial Authority to Operate (DATO), or blocking the connection at the USAID network boundary.

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.

USAID aims to strengthen and standardize the AI use case review process and determinations leveraging existing business processes, requirements, and regulations. The Council on AI will provide strategic direction and guidance to inform these reviews. While this is not yet developed, the initial review process is expected to be primarily qualitative, focusing on whether a use case meets the required criteria. Reviews will be documented in a centralized repository managed by the CAIO team.

USAID emphasizes a holistic evaluation of AI use cases, assessing the system as a whole and comparing it to non-AI alternatives. The use case inventory process will involve an initial intake, an inventory survey and questionnaire, and additional reviews for AI that may impact safety or rights. During intake, business owners will submit a short AI intake form, and reviewers will determine if the use case meets the inclusion criteria of M-24-10. If the case is out of scope, due to not meeting the AI definition or

falling under M-24-10's exclusion criteria for non-operational research, the process ends. For in-scope use cases, the owner will complete an additional OMB-mandated questionnaire to help reviewers assess whether the AI use case is safety- or rights-impacting. If not, the process concludes. If the AI is deemed safety- or rights-impacting, further review and requirements will be applied, with use case owners submitting an additional questionnaire for compliance with M-24-10 requirements.