

U.S. Commission on Civil Rights

Since 1957

Artificial Intelligence (AI) Compliance Plan

Strengthening AI Governance at USCCR

The U.S. Commission on Civil Rights (USCCR) has established a new AI Team, currently in its initial stages. This group comprises members from the Administrative and IT Office (ASCD/IT), Office of the Staff Director (OSD), Human Resources Division (HRD), Office of Civil Rights Evaluation (OCRE)/(CSSBMB), and the Office of General Counsel (OGC). Their primary goals are to develop guidelines for evaluating AI products and ensure compliance with the M-24-10 rules. To achieve these objectives, the group will collaborate closely across offices and seek advice from external experts as needed.

The USCCR evaluates potential uses of AI with a focus on the impact of such use considering applicable civil rights laws and the agency's mission.

In line with the 2024 AI Use Case Inventory instructions from the Chief AI Council, the AI Team will be reviewing all existing IT applications and Commercial Off the Shelf (COTS) systems to establish an inventory of AI-based use cases.

The process for soliciting and collecting AI use cases is a collaborative effort. It begins with the ASCD/IT team reviewing all software inventory to identify and assess any AI elements. The AI Team is also developing internal evaluation processes and associated templates to address AI risks related to performance, reliability, bias, fairness, accountability, transparency, security, and privacy. This AI use case inventory and evaluation process will be reviewed and updated regularly, but at a minimum, every 18 months.

Advancing Responsible AI Innovation

The USCCR is conducting an internal review of its acquisition process to capture the necessary steps and contractual language to remove procurement barriers and ensure that all technology vendors adhere to Responsible AI standards. Additionally, ASCD/IT, in collaboration with other Agency divisions, routinely reviews the Agency's technical infrastructure and software needs. As AI use cases arise or adapt, this new AI Evaluation Process will help identify issues and compliance.

Recognizing the importance of cultivating AI knowledge and skills, the USCCR is assessing current and future needs for AI expertise across the Agency. The Agency is actively reviewing professional development and learning opportunities for staff to support AI and other technology-related enforcement and policy-making activities. As the Agency's AI strategy and approach evolve, it will

continue to monitor developments and remain open to collaborative opportunities to support attracting, retaining, and developing AI talent within the agency.

Managing Risks from the Use of Artificial Intelligence

The AI team will advise Senior Leadership to communicate with all employees and contractors regarding the use of generative AI. This communication will emphasize the potential risks associated with generative AI and reinforce existing internal policies governing the use of technology for agency-related activities. ASCD/IT is continuously assessing the evolution and adoption of generative AI across various federal, state, and US Territories. Given the agency's State and US Territory Advisory Committees, it is essential to update internal policies to reflect these developments.

As outlined in the sections on Strengthening AI Governance and Advancing Responsible Innovation, the newly developed AI evaluation process, checklists for policies, and procurement involvement by the Agency AI Team will help identify AI technologies that may impact the safety or civil rights of all. Furthermore, the Chief AI Officer (CAIO) and the AI Team will actively participate in inter-agency AI sessions to learn and develop policies and establish best practices for risk management within the Agency.