



ARTIFICIAL INTELLIGENCE COMPLIANCE PLAN

September 2025

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EXECUTIVE SUMMARY

The Artificial Intelligence (AI) in Government Act of 2020 and OMB Memorandum M-25-21, (*April 3, 2025*), requires every federal agency to provide an AI plan or statement of non-use to the Office of Management and Budget (OMB) and make it publicly available on their website.

This *Artificial Intelligence Compliance Plan* (The AI Plan) outlines Peace Corps' plan to comply with the requirements under *OMB Memorandums M-25-21 Accelerating Federal Use of AI through Innovation, Governance and Public Trust and M-25-22 Driving Efficient Acquisition of Artificial Intelligence in Governance (April 3, 2025)* as an independent agency within the executive branch of the government. This AI Plan provides information to support the Chief Artificial Intelligence Officer (CAIO) effort to ensure the agency's responsible use of artificial intelligence (AI) and in accordance with Federal guidelines and mandatory requirements.¹

OMB M-25-21 and M-25-22 are designed to support the implementation of Executive Order 14179 *Removing Barriers to American Leadership in Artificial Intelligence* (January 23, 2025) and focuses on removing existing policies on AI technologies to facilitate efficient, responsible adoption across the Federal government and improve public services. The AI Plan addresses the agency's AI governance, inventories, barriers, talent, collaboration, harmonization, and risk management, policies and practices.

OMB Memo M-25-21 outlines a new framework that encourages federal agencies to accelerate AI technologies adoption by focusing on three key priorities: innovation, governance and public trust. OMB Memo M-25-22 complements Memo M-25-21 by instructing federal agencies on how to responsibly acquire AI by maximizing U.S. competitiveness to ensure high-quality, cost-effective solutions to help manage risks, and promotes effective AI acquisition through cross-functional engagement.

The Peace Corps mission to promote world peace and friendship through community-based development and intercultural understanding depends on providing efficient and effective support to Volunteers serving in overseas communities worldwide. This AI Plan advances the agency's mission by ensuring that the agency's accelerated AI adoption is implemented in a responsible, secure, mission-focused manner, and complies with *OMB M-25-21 and M-25-22* guidance and requirements.

AI SUPPORT OF AGENCY OBJECTIVES

This AI Plan is directly aligned with the agency's overarching mission and drives progress toward the agency's stated objectives to:

- **Increased Efficiency:** The agency's AI adoption enables the agency to streamline and automate routine, resource-intensive processes—such as generating standard reports, records management, language translation, and automating some Volunteer support services—allowing staff to focus on higher-value activities that helps maximize and improve existing resources to directly advance the agency's mission.

¹ Pursuant to M-25-21, the Chief Executive Officer has designated the Chief Information Officer as the CAIO.

- **Volunteer Expansion:** By acquiring and deploying AI responsibly, the agency will be better positioned to streamline operations and reduce administrative overhead, improve data analysis of program impact data and optimize resource allocation. This AI Plan helps support the Peace Corps' efforts to scale toward its strategic target of supporting 8,000 Volunteers in service across all posts by September 30, 2030.
- **Improved Service Delivery:** AI tools can help strengthen Volunteer well-being support—from health and safety monitoring to program coordination—to improve the overall Volunteer experience and effectiveness of Peace Corps' service.
- **Data Rights and Privacy:** The Peace Corps has developed policies and procedures, including contractual terms and conditions, that ensure compliance with privacy requirements whenever the agency acquires an AI system or service that will create, collect, use, process, store, maintain, disseminate, disclose, or dispose of federal information containing personally identifiable information.

AI USE SUPPORTS ADVANCEMENT OF OCIO'S STRATEGIC GOALS

The AI Plan is structured to drive progress toward the agency's stated objectives:

- **Security and Privacy Controls:** The AI Plan is consistent with OCIO's compliance practice to embed continuous security monitoring, privacy safeguards, and is in alignment with federal cybersecurity and to evaluate the performance, risk management, and effectiveness of an AI system or service. This ensures that the agency's AI adoption enhances agency's operations without introducing unacceptable risks to government data.
- **Enhanced Efficiency:** The agency's AI adoption is guided by governance and inventory processes that prevent redundancy, reduce costs, and promote best practices and reuse of shared solutions, supporting the OCIO's portfolio rationalization objectives.
- **Effectiveness:** By establishing clear AI policies and practices, use case reviews, and accountability mechanisms, the agency ensures that AI investments deliver measurable improvements in program delivery and mission outcomes.

DRIVING TRUST AND INNOVATION

The AI Plan reinforces the agency's commitment to transparency and public trust by publicly publishing annually on its website its AI use cases, inventories, and AI policies.

SCOPE & APPLICABILITY

The AI Plan is mandatory and applies agency-wide; it applies to all AI activities including the development, acquisition, and usage, without exemptions.

AUTHORITIES & ALIGNMENT

The Peace Corps' AI Plan is primarily guided by federal mandates from OMB memos and guidance, executive orders, and other federal statutory and regulatory requirements that include but are not limited to the following:

- *OMB M-25-21 Accelerating Federal Use of AI Through Innovation, Governance, and Public Trust (April 3, 2025)*
- *OMB M-25-22 Driving Efficient Acquisition of Artificial Intelligence in Governance (April 3, 2025)*
- *Advancing American AI Act of 2022*
- *AI in Government Act of 2020*
- *OMB Circular A-130 Managing Information as a Strategic Resource (July 28, 2016)*
- *Executive Order 14179 Removing Barriers to American Leadership in Artificial Intelligence (January 23, 2025)*
- *Executive Order 13960 Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government (December 3, 2020)*
- *FAR 52.212-4 Contract Terms and Conditions- Commercial Products and Commercial Services*
- *Peace Corps Policy Manual Section 547 Use of Government Technology Services and Equipment (December 16, 2024)*
- *Peace Corps Manual Section 544 Information Technology Management (July 17, 2025)*

POSITIONING THE AGENCY FOR AI ROBUSTNESS AND EXCELLENCE

GENERATIVE AI POLICY

The Peace Corps integrated its generative AI requirements into existing policies *Manual Section 544 Information Technology Management* and *MS 547 Use of Government Technology Services and Equipment*. These policies, posted on the agency's intranet, outline the safeguards for data, privacy, ethics, and oversight. Additionally, the policy codifies additionally mandatory governance review of AI use cases through the agency's existing solution delivery lifecycle. The agency uses continuous monitoring tools and other security methods and processes to support AI use cases and is under review.

GOVERNANCE BODIES AND ROLES

The AI Plan outlines a clear governance structure, detailing the AI groups and key personnel responsible for its implementation:

- **AI Working Group:** Explores, evaluates, and guides the responsible acquisition, integration of AI to drive innovation, enhance operational efficiency and empower the agency the agency's institutional effectiveness, all while managing risk and ethical standards, and help coordinate cross-functional oversight across federal agencies. Members include subject matter experts from: IT governance, IT enterprise architect, cybersecurity, general counsel, privacy, budget and records, and data management.
- **AI Innovation Group:** Explores and reviews AI pilots and innovative AI use cases; members from the Office of the Chief Information Officer (OCIO), Office of Strategic Information, Research, and Planning (OSIRP), and select program offices when necessary.

- **Enterprise Architecture Working Group:** AI use case undergoes an initial review by OCIO's enterprise architecture team.
- **Senior Policy Committee (SPC):** Manages and coordinates the development of Peace Corps policies and procedures, makes recommendations to the Director on new AI policies and revisions to AI existing policies in the *Peace Corps Manual*, and approves the adoption of procedures to implement policies in the *Peace Corps Manual*.
- **Compliance and Risk Team:** Oversees the Peace Corps' Office of the CIO's compliance and enterprise risk management (ERM) programs and risk management practices for "high-impact" AI use cases.
- **Chief AI Officer (CAIO):** Promotes AI innovation, adoption, and governance, in coordination with appropriate agency officials. Leads the AI working group, development of AI related policy, inventory management, compliance reviews, and agency reporting.

DEVELOPING AI TALENT, TRAINING AND AI COLLABORATION

Due to the current Federal hiring freeze and staff streamlining objectives, the Peace Corps has made a strategic decision to focus on internal talent development rather than external hiring for the agency's artificial intelligence initiatives. The agency's current investment is centered on upskilling our technical staff to build and implement AI solutions that align directly with our mission.

Hiring

- Use direct hire authority, and government pathways programs
- Targeted AI positions: data scientist (1560), IT specialist (2210, AI focus), program analyst (0343, AI)

Training

To encourage workforce readiness, the Peace Corps' mandatory AI training teaches fundamental AI principles, ethical considerations, mitigates risks and ensures compliance with federal mandates and agency policies while fostering a culture of innovation, productivity and efficiency. The agency's AI training includes:

- Mandatory introductory training covering policy and very basic large language model (LLM) use (target – 100 percent of staff by December 2025).
- Online role-based training (foundation, intermediate, advanced).
- AI community of practice participation.
- Controlled use of public AI tools for professional development.

AI Code and Model Sharing

In accordance with OMB Memo M-25-21, the Peace Corps will reuse and share AI code and models by releasing and maintaining AI code as open-source software in a public

repository to the extent permitted by law. At present the organization has neither custom AI code or models. The agency intends to share through the following means:

- Custom Code: Shared per M-25-21 Section 4(b); reviewed by OCIO prior to release and use. If developed, this code would be published to an agency Github-type web site.
- Where applicable, models would be made available to the public as prescribed with the Open, Public, Electronic and Necessary (OPEN) Government Data Act.
- Public Engagement: Hackathons, external collaborations.

REMOVING BARRIERS TO RESPONSIBLE AI USE

AI adoption challenges to ensure transformative and successful implementation generally include limited: scalable infrastructure, AI acquisition resources, procurement expertise and in-house expertise, and privacy and security. These hurdles can prevent agencies from integrating AI into their operations at scale. The AI Plan identifies ways the agency can remove barriers for responsible AI use. The table below explains various mitigation strategies to improve agency scalability.

Table 1. Removing Barriers to Responsible AI Use

Barrier	Mitigation Strategy
Limited scalable infrastructure	<ul style="list-style-type: none"> • Employ vendor/federal cloud pre-trained AI, using Peace Corps data sources for data grounding. • Provide enterprise data platform with sandbox environments.
Security and Privacy Concerns	<ul style="list-style-type: none"> • Peace Corps will rely on its cybersecurity and privacy programs to review all AI solutions to ensure that the implementation is consistent with its cybersecurity and privacy strategies. • Formal and informal education will be provided to educate users on their responsibilities, agency policies, and best practices.
Limited AI acquisition resources	<ul style="list-style-type: none"> • Utilize vendor hosted LLMs integrated with existing technology stack, offsetting cost where possible by rationalizing IT portfolio. • Prioritize utilizing federal shared AI tools at reduced cost will be prioritized (e.g. USAi).
Limited AI procurement expertise	<ul style="list-style-type: none"> • Inter-agency agreements (AA)/memoranda of understanding (MOUs) to deploy pilot projects and sandbox testing allow the Peace Corps to gain experience with AI offerings at low/no cost.
Limited AI experience and expertise	<ul style="list-style-type: none"> • Provide self-paced AI training. • Provide vendor-led training. • Conduct brown-bag sessions to address FAQs.

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| | <ul style="list-style-type: none"> • Peace Corps AI community of practice. • Engage with Federal community of practice groups and commercial executive leadership offerings. |
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COLLABORATION INTERNALLY AND WITH OTHER AGENCIES AND BEST PRACTICES

The Peace Corps shares its AI uses internally and with other agencies by creating shared tools for efficiency, data analysis, and informed decision-making which lowers costs and improves outcomes within and across the government. This kind of collaboration fosters innovation, avoids duplicated effort, and allows for the creation of more robust systems for public services and security, and contributes to a shared federal repository of best practices.

The Peace Corps’ AI governance and risk management best practices are documented and shared internally on the Peace Corps’ Intranet. The CAIO shares agency’s AI compliance messaging in weekly agency newsletters, during senior leadership meetings and discussions, and through agency town hall meetings. The CAIO also disseminates the agency’s AI compliance with M-25-21 and M-25-22 externally through federal government-wide CAIO meetings and official engagements like the CAIO Council, CDO Council, Small Agency CIOs, and the Partnership for Public Progress.

DEVELOPING AI USE CASE INVENTORY

HIGH LEVEL SUMMARY OF AI REVIEW PROCESS

To ensure a unified procedural framework to assess AI use cases, the Peace Corps developed standard operating procedures (SOPs) to ensure its AI acquisition and innovation is pursued responsibly, ethically, and in alignment with executive orders, statutory and regulatory requirements, and OMB and agency policies and guidance. The agency’s SOP framework provides a foundation for the agency to assess risks, promote transparency, and build public trust in its acquisition and deployment of its AI technologies. A summary of the AI SOP requires the following:

- Employees must complete a standardized questionnaire template that the AI Workgroup and Innovation Group reviews using specific federal statutory and regulatory requirements and guidelines.
- OCIO maintains a centralized submission system for requests.
- AI use case requests are subjected to additional review analysis and requirements to address specific AI use concerns (process described below).
- Use case requests are integrated into the OCIO Authorization to Operate (ATO) review and AI acquisition and contract review process.
- Authorized AI use cases are added to the agency inventory and published where necessary.
- Authorized AI applications and systems are subject to continuous monitoring of security controls, privacy requirements, use identified incident management, and CAIO audits for continued compliance.

EXEMPTION REPORTING

The Peace Corps inventory's all its authorized use cases and has not approved any exempt use cases. If exemptions become necessary, the Peace Corps will evaluate it through OMB's prescribed process and will post notification of the exemption on its website.

RISK MANAGEMENT

Identifying Safety or Rights Impacting AI

To identify potential security and privacy risks, assess their impact, and to help prevent small problems from escalating to larger issues, the Peace Corps has implemented an enterprise-wide AI policy and corresponding assessment and review process to determine which current or planned AI use cases may present safety- or rights-impacting issues.

- **Enterprise Architecture Review process.** Each current or planned AI use case is required to undergo an initial review by the OCIO's enterprise architecture team. During this initial review, if the solution is determined to employ artificial intelligence, the solution is flagged and forwarded to the AI working group for analysis.
- **AI Working Group review.** Determines whether the use case meets the definition of safety- or rights-impacting AI as defined in *section 6 of OMB M-24-10 and Appendix I*, respectively. These criteria include whether the AI output would serve as a principal basis for a decision or action and real-world considerations of potential harm to protected or otherwise critical populations, entities, and resources. This review can impose restrictions or new requirements on the solution to ensure the mitigation or reduction of identified risks.

Establishing Minimum Risk-Management Practices

- **Impact assessment.** Every AI use case that is presumed to be safety- or rights-impacting shall undergo an AI risk impact assessment, which includes a security and privacy controls review that meet or exceed the minimum risk-management principles that are required pursuant to *Executive Orders 13960 and 14179*. The review process assesses the quality and appropriateness of AI use cases, all data considered for those use cases, purpose of use, and potential harms to health, safety, privacy, security, and rights.
- **Determination process.** The CAIO, in conjunction with the AI Working Group will review whether the AI use case, along with its impact assessment, satisfies the definitions of safety- or rights-impacting in *section 6 of OMB M-24-10*. The CAIO shall determine whether the AI use case complies with the definition of safety- or rights-impacting after considering the conditions and context of the use case and whether the AI is serving as the principal basis for a decision or action.
- **Waiver process.** In limited circumstances, waivers of minimum risk-managements practices may be granted in accordance with OMB M-24-10 section 5(c)(iii). The CAIO will establish standard procedures to waive risk-management practices, to ensure that waivers are granted only when necessary. Any decisions to grant or revoke a waiver will

require documentation of the scope, justification, and supporting evidence. The AI Working Group shall establish procedures for issuing, denying, and revoking waivers, with oversight by the CAIO and the AI enablement working group.

Determination of High-Impact AI

The Peace Corps does not currently use or plan to develop any “high impact” AI systems. All potential AI use cases are reviewed by the AI Working Group to assess their potential safety and rights impact, and prescriptive action before being approved. The organization will revise its policies, MS 544 and MS 547, to codify that high-impact AI use cases will be prohibited for agency use.

AI Waivers and Pilot Projects

The Peace Corps does not currently require any waivers and are not expected to be necessary for the agency’s AI initiatives. As part of the agency’s normal policy review process, as its AI policy and associated risk management practices mature, they will be updated in accordance with the standard policy review process. Specifically, the organization will implement the following:

- **Criteria for Waivers:** Develop criteria to guide the decision to waive risk management practices, ensuring that waivers are granted only when necessary and justified.
- **Issuance and Revocation:** Establish procedures for issuing, denying, revoking, tracking, and certifying waivers, with oversight from the CAIO and the AI governance body.
- **Documentation and Transparency:** Maintain detailed records of all waiver decisions to ensure transparency and accountability.
 - **Documentation and validation.** The CAIO is responsible for overseeing the documentation and validation of current and planned risk-management practices for all AI uses cases that impact safety and rights ensuring they are designed, implemented and operating effectively. The AI Working Group is required to maintain detailed records of all use cases and extensions, waivers, and determination decisions to support consistent reviews, enable effective compliance and reporting, and promote transparency and accountability.
 - **Publication and annual certification of waiver and determination actions.** All materials and documents related to a waiver or determination action will be reported to OMB within 30 days. An annual certification process of the ongoing validity of waivers and determinations will be conducted by the CAIO, the AI Working Group, and the owners of relevant AI use cases. The AI Working Group will develop procedures for certifying all waivers and determinations. A summary of the outcome of the annual certification process, detailing individual waivers and determinations along with justification, will be shared with OMB and the public in accordance with *OMB M-24-10 section 5(a)(ii)*. If there are no active determinations or waivers, that information will be shared with the public and reported to OMB.
- **Implementation and oversight.** The AI Working Group has implemented a dedicated workstream with responsibility for the implementation and oversight of the AI risk-management practices. The workstream includes members specializing in relevant

mission and compliance functions, including but not limited to technology, security, privacy, legal, data, contract acquisition and enterprise risk management, and represents a diversity of enterprise perspectives. The group is responsible for promoting consistent and comprehensive AI risk management through the use case review and impact assessment processes. This workstream is also responsible for maintaining a register of enterprise AI risks and associated mitigations to promote active management and accountability across the board.

Non-Compliance and Termination

- Non-compliant systems, or those producing biased, or inaccurate outputs are subject to revocation of their authority to operate. The severity of issue may result in the permanent termination of their use.

AI ACQUISITION & VENDOR PERFORMANCE MANAGEMENT

The Peace Corps shall implement acquisition practices consistent with *OMB Memorandum M-25-22* to ensure that AI solutions are procured efficiently, securely, and in ways that (1) scope licensing and other IP rights based on the intended use of AI to avoid vendor lock-in; (2) ensure components necessary to operate and monitor an AI system or service remain available for as long as necessary; (3) provide guidance on handling, accessing, and using agency data or information to ensure that such information is only collected and retained by a vendor when necessary to perform the contract; (4) prohibit the use of non-public inputted agency data and outputted results to train publicly or commercially available AI algorithms without express agency consent; and (5) prioritize obtaining documentation from contractors that facilitates transparency and ensures the ability to track the performance and effectiveness of procured AI.

The Peace Corps shall ensure that contractors providing AI services to the government will receive notice that they should anticipate data rights negotiations (at least where the AI is not a commercially available solution governed by FAR 52.212-4) and that they have strict parameters around the contractor's ability to use government data for non-contractual purposes (restrictions that will likely be similar to those applicable to controlled unclassified information). The agency shall employ a quality assurance surveillance plan throughout the lifecycle of all AI systems to help the agency monitor performance effectiveness, mitigate new risks or correct changes and contract incentives, including those tied to achieving quality assurance surveillance plan metrics.

This will help maximize value to the agency and the public. These practices align with the OCIO's goals of a secure, efficient, and effective IT portfolio and help support the agency's broader objective of achieving operational efficiency to sustain up to 8,000 Volunteers worldwide.

Market Research and Due Diligence

- Prior to acquisition, program and contracting staff shall conduct market research to evaluate commercial AI offerings, shared service options, and government-wide acquisition vehicles with a domestic American preference for AI solutions.

- The program and contract acquisition staff shall conduct broad market research, including seeking out novel AI capabilities from new market entrants by providing opportunities for product demonstrations and participating in the GSA's OneGov initiative. The agency will explicitly consider cost, performance, vendor viability, data rights, and interoperability with the Peace Corps' existing IT enterprise systems.

Data Rights and Ownership

- The Peace Corps' contracting language shall ensure the Peace Corps AI policies and procedures retains agency's rights to use and ownership of government data, model outputs, and includes appropriate contractual terms that clearly delineate the respective ownership and IP rights of the government and the contractor agency, and to prevent vendor lock-in and lock-out
- Vendors will be required to document data provenance, training data sources, and usage rights that are consistent with *OMB M-25-21 Section 6* and *M-25-22* guidance.

Performance Monitoring and Evaluation

- The agency shall include in its solicitation, when appropriate a provision requiring disclosure of AI use as part of contract performance. Solicitations shall also include requirements for post-award performance monitoring, including technical performance metrics, fairness testing, and explainability reporting. The agency shall require contractors to closely examine their solicitations and contracts to determine whether there are any restrictions on the use of AI performance. Even where no restriction exists, contractors will ultimately be responsible for whatever AI outputs they rely on for performance.
- The CAIO, in coordination with the OCIO acquisition staff, shall maintain oversight of contractor performance to ensure AI systems remain secure, effective, and aligned with agency mission outcomes.

Risk and Security Considerations

- All AI acquisitions must undergo governance review by the AI Working Group and IT governance bodies to ensure compliance with Peace Corps privacy, cybersecurity, and records management policies.
 - Contractors will be held accountable for compliance with Federal information security and privacy standards, including *OMB Circular A-130* and National Institute of Standards and Technology (NIST) guidance.

Collaboration and Shared Solutions

- To reduce costs and promote reuse, the Peace Corps shall explore interagency collaboration opportunities and leverage government-wide solutions when available.

- AI tools or code developed through Peace Corps contracts that are appropriate for public release will be shared through open.peacecorps.gov and [Data.gov](https://data.gov) in compliance with *M-25-21 Section 4(d)*.

Continuous Improvement

- AI acquisition practices shall be reviewed biannually by the CAIO, OCIO acquisition staff, and the senior procurement executive to identify opportunities for improvement, update standard contract language, and incorporate evolving best practices.

TRANSPARENCY & PUBLIC ENGAGEMENT

- Pursuant to Executive Order 13960 *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government*, Federal agencies are required to create and make publicly available an inventory of non-classified and non-sensitive Artificial Intelligence (AI) use cases, to the extent practicable and in accordance with applicable law and policy. The Peace Corps publishes on an annual basis its non-classified and non-sensitive AI use case inventory at <https://www.peacecorps.gov/AI>.
- The Peace Corps provides plain-language descriptions of use cases.
- Internally, staff are directed to contact the Service Desk if they see suspicious information or adverse AI conditions. For public users, should send their concerns to <https://www.peacecorps.gov/AI>. OCIO shall provide contact information to Peace Corps staff to report suspicious activity or adverse AI conditions.

REQUIRED SUBMISSIONS AND DEADLINES

Table 2. Required Submission & Deadlines*

Action	Deadline	Memorandum	Status
Retain or designate a Chief AI Officer.	60 days	M-25-21, 3(a)(i)	Complete
Submit to OMB and release publicly an agency compliance plan to achieve consistency with this memorandum, or a written determination that the agency does not use and does not anticipate using covered AI.	180 days, and every two years until 2036	M-25-21, 3(b)(ii)	9/30/25 Submission in process
Update internal policies on IT infrastructure, 3(b)(iii) data, cybersecurity, and privacy.	270 days	M-25-21, 3(b)(iii)	Complete – July 2025
Develop a Generative AI policy.	270 days	M-25-21, 3(b)(iv)	Complete – July 2025
Implement the minimum risk management practices for high-impact uses of AI.	365 days	M-25-21, 4(a)(i)	In process
Report directly to OMB any determinations and waivers that are granted or revoked.	Annually	M-25-21, 4(a)(iii)	N/A
Publicly report determinations and waivers for AI use cases.	365 days	M-25-21, 4(a)(iv)	N/A
Publicly release an AI use case inventory consistent with OMB instructions.	Annually	M-51-21, 3(b)(v)	In compliance
Achieve full compliance with the Guidance of this memorandum	180 days	M-25-22, 2(c)	In Compliance
Include the process by which the agency will standardize the treatment of data	200 days	M-25-22, 3(d)	Under development

ownership and IP rights in procurements for AI systems or services as part of policy and process updates.			
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**List does not include CFO Act agency only requirements.*