From: Worthington, Charles
Sent: Mon, 10 Feb 2025 16:29:20 +0000
To: Fulcher, Justin L.
Subject: FW: Draft Message to AI Governance Council
Attachments: Artificial Intelligence Governance Council Charter.pdf, AI-Use-Case-Inventory-VA_BULK-UPLOAD-For-Website_Last-Update-12-16-2024.xlsx

Hi Justin – this is the message I was hoping to send to AI Governance Council members.

From: Worthington, Charles <(b)(6)@va.gov>
Date: Thursday, February 6, 2025 at 4:29 PM
To: Brazell, Karen L. (b)(6)@va.gov>, Fulcher, Justin L. <(b)(6)@va.gov>
Cc: Beard, Dewaine L. <(b)(6)@va.gov>, McManus, Kimberly F. (b)(6)@va.gov>
Subject: Draft Message to AI Governance Council

Hi Karen – as discussed.

BLUF: Seeking your recommendation / approval to send an update to the VA's AI leaders (members of the AI Governance Council) regarding the recent changes in AI policy.

(b)(5)

Recommendation:

- (b)(5)
-

Hello AI Governance Council Members,

I hope everyone had a wonderful New Year!

As you may have seen, on January 20 the President rescinded EO 14110, Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence. On January 23, 2025, the President issued EO 14179 titled, Removing Barriers to American Leadership in Artificial Intelligence. Notably, the new EO directs the OMB Director to review memoranda M-24-10 and M-24-18 and make revisions necessary to ensure it complies with the President's stated AI policy goal, "to sustain and enhance America's global AI dominance in order to promote human flourishing, economic competitiveness, and national security." **OMB has communicated that they are** (b)(5)

(b)(5)

We will closely monitor this process so we can react quickly to any updates made to OMB policy in M-24-10 and M-24-18 that will impact VA's use or governance of AI.

While we wait for these updates, we are taking the following actions:

1. (b)(5)
2.
3.

I look forward to working with you all throughout 2025 to further VA's safe and effective use of this important technology.

Charles Worthington
Chief Technology Officer & Chief Artificial Intelligence Officer
U.S. Department of Veterans Affairs
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U.S. Department of Veterans Affairs

ARTIFICIAL INTELLIGENCE GOVERNANCE COUNCIL

September 2024 | Version 1.06

Table of Contents

I. PURPOSE

The Veterans Affairs (VA) Artificial Intelligence Governance Council is aligned under the VA Operations Board and, in accordance with Executive Order 14110 and Office of Management and Budget Memorandum 24-10, serves as VA's principal governing body for safety, security, privacy, equity, and civil rights protection for artificial intelligence[1] development and use.

II. AUTHORITY

The Artificial Intelligence Governance Council is established at the direction of the VA Deputy Secretary acting upon recommendations of the Chief Information Officer, Chief Technology Officer, and Chief Data Officer to implement (b)(5)

(b)(5)

III. SCOPE OF RESPONSIBILITIES

1. Develop and approve enterprise strategies and plans for advancing the responsible use of artificial intelligence to include removing barriers to its use and managing the associated risks of systems driven or enabled by artificial intelligence.
2. Create and approve policies and processes to test and evaluate artificial intelligence measures of safety, security, privacy, equity, and civil rights protection for compliance with Federal standards and best practices.
3. Provide input for, or participate in, critical stages of pre-implementation testing and performance evaluation of artificial intelligence systems.
4. Review post-implementation evaluations to ensure artificial intelligence services and programs meet forecasted benefits and outcomes.
5. Provide direction and counsel to the Office of the Chief Artificial Intelligence Officer.

[1] Refer to Appendix D for terms and definitions.

6. Resolve disputes between the Office of the Chief Artificial Intelligence Officer and program offices involved in artificial intelligence development, procurement, testing, or use.
7. Establish cross-team collaboration to provide guidance, identify common agency challenges, establish best practices, and share solutions.
8. Leverage the experience and business context of other governance entities in VA for strategy recommendations, insights, and lessons learned in the areas of risk management and mitigation, impact of decisions on program executors, and improved buy-in across agency.
9. Review and consult with senior executives responsible for artificial intelligence program status reports to oversight agencies, for example, Office of Management and Budget, Office of the Inspector General, and the Government Accountability Office.

IV. MEMBERSHIP

A. MEMBER ORGANIZATIONS

The Assistant or Under Secretary, as applicable, of organizations listed below will designate a representative who will serve as voting member or advisor on the Artificial Intelligence Governance Council. Please refer to Appendix B for the list of principal members.

(1) Board of Veterans Appeals (BVA);
(2) Office of Human Resources and Administration/Operations, Security, and Preparedness (HRA/OSP);
(3) Office of Acquisitions, Logistics and Construction (OALC;)
(4) Office of Congressional and Legislative Affairs (OCLA);
(5) Office of Enterprise Integration (OEI);
(6) Office of General Counsel (OGC);
(7) Office of Information and Technology (OIT);
(8) Office of Inspector General (OIG);
(9) Office of Management (OM);
(10) Office of Public and Intergovernmental Affairs (OPIA);
(11) Office of Small and Disadvantaged Business Utilization (OSDBU);
(12) Office of the Secretary of Veterans Affairs (OSVA);
(13) National Cemetery Administration (NCA);
(14) Veterans Experience Office (VEO);
(15) Veterans Benefits Administration (VBA); and
(16) Veterans Health Administration (VHA).

B. CHAIR

The VA Deputy Secretary serves as the Council Chair and ensures all opinions are heard prior to council decision making. The Council Chair is a non-voting member with veto and tie-breaking authority. This arrangement is necessary to preserve the superior authority of the VAOB while satisfying the OMB M-24-10 requirement for the Deputy Secretary to serve as Chair of this

council. The VA Chief Artificial Intelligence Officer will serve as Acting Council Chair in the Deputy Secretary's absence.

C. VICE CHAIRS

The VA Chief Artificial Intelligence Officer and VHA Chief Digital Health Officer serve as co-Vice Chairs and assist the Council Chair with setting the council's agenda and prioritizing topics brought before the council for decision or information purposes. Council Vice Chairs are voting members for their respective organizations with one exception. When serving as proxy Council Chair, the VA Chief Artificial Intelligence Officer is a non-voting member but may confer voting responsibilities upon their designated proxy.

D. VOTING MEMBERS

Voting members are comprised of senior leaders at the Principal Deputy Assistant Secretary level or their delegate from each member organization of the Council. They must be well informed of the artificial intelligence policies, programs, systems, and initiatives of their organization, have the means to coordinate with stakeholders to share the council's artificial intelligence guidance and decisions, and escalate their stakeholders' artificial intelligence safety and security issues and recommendations to the council for awareness and oversight.

E. ADVISORS

Advisors (non-voting members) are artificial intelligence program stakeholders and subject matter experts selected at the discretion of the Council Chair, Vice Chairs, and Voting Members for the effective and efficient conduct of council business.

F. PROXIES

Chairs and voting members may designate a proxy to represent them in meetings and vote on their behalf. In the principal's absence, the designated proxy assumes their role, responsibilities, and voting privileges. The vote by a proxy is recorded by the Office of Information and Technology Governance Team as an official vote of the organization and member a proxy represents.

G. GUESTS

Chairs and voting members may grant their support staff and advisors access to council meetings and governance document repositories for the effective conduct of council business. Send requests to the Office of Information and Technology Governance Team for processing and recordkeeping.

H. GOVERNANCE TEAM

The Office of Information and Technology Governance Team supports the council and will ensure that the Chair, Vice Chairs, Voting Members, and Advisors receive notice of all meetings, have access to all pre-meeting materials and briefings, and have access to all historical documentation of

council minutes, decisions, and action items.

V. STAFFING AND PROCEDURES

A. MEETINGS

The council will meet at least semi-annually. Meetings will follow an orderly flow and participants will observe standard meeting etiquette presented by the Office of Information and Technology Governance Team at the outset of each meeting.

B. QUORUM

The Council Chair may call a meeting to order without a quorum of voting members, however, the council may not vote on matters until and unless a quorum is present. Quorum equates to a simple majority of voting members plus the Chair. If quorum cannot be reached and a vote is required, the meeting will be rescheduled at the discretion of the Chair.

C. VOTING

Council decisions are made by simple majority vote, which is 50% of voting members plus 1. Motions that cannot be decided by majority vote or result in a tie may be amended as necessary to obtain majority approval, referred to the Chair to break a tie, or elevated to the VA Operations Board for decision. In turn, the chair may break the tie or refer the topic to the VA Operations Board. The Chair may call for a roll-call vote to ensure results and dissenting opinions are accurately recorded in the meeting minutes.

Nothing in this charter restricts or supersedes the Secretary or Deputy Secretary's inherent decision-making authority for artificial intelligence policies and programs in VA. Decisions requiring review or approval under authority reserved by the Secretary, Deputy Secretary, other duly appointed VA officers or designated governance bodies will be staffed by the Office of Information and Technology Governance Team in coordination with the appropriate decision authority.

D. ELECTRONIC VOTING

A meeting is not required for all council decisions. The Chair retains discretion to allow electronic concurrence or voting by email, VA Integrated Enterprise Workflow, or other approved method of recording.

E. REPORTING

All historical meeting documents, presentations, record of minutes, actions, and decisions will be published for reference in the council's Microsoft Teams space, maintained by the Office of Information and Technology Governance Team.

F. COMPONENT GOVERNANCE

The council may convene other governance bodies as needed to address specific activities or concerns, e.g., committees, working groups or integrated product teams, which are comprised of employees selected from participating organizations in coordination with their council representative.

The council will defer final decisions on data policies, procedures, initiatives, and issues to the VA Data Governance Council in accordance with VA Directive 0900 and VA Handbook 0900.

The council will defer final decisions on capital investment strategy, budget, and portfolio management to the Information and Technology Investment Council or the Investment Review Council, as appropriate.

G. CHARTER AMENDMENTS

Any member of the council may recommend amendments to this charter for the council's consideration and approval per its voting procedures. Changes of a critical or substantive nature must be ratified by the VA Operations Board before taking effect.

H. CLOSEOUT

This charter may be revoked by the Secretary, Deputy Secretary, or VA Operations Board in coordination with council chairs after all responsibilities for which the council was chartered have been eliminated through VA policy or directive, or have been transferred to the sponsoring governance forum, accountable senior executive, or other competent authority such as another VA Governance Forum.

VI. EFFECTIVE DATE

This charter is effective as of the date signed by the Deputy Secretary. It will be reviewed periodically to ensure relevance and utility, and remain in effect until modified, rescinded, or revoked by the VA Operations Board, Deputy Secretary, or Secretary.

VII. APPROVAL SIGNATURE

Tanya J. Bradsher
Deputy Secretary
Department of Veterans Affairs

APPENDIX A: REVISION HISTORY

Version	Date	Section	Page	Revision History or Review (Author)
0.01	12/27/23	All	N/A	(b)(5) (b)(6)
0.02	1/24/24	IV-B	4	(b)(5) (b)(6)
0.03	1/24/24	V-C	5	C (b)(5) (b)(6)
0.04	1/24/24	Appendix B	8	(b)(5) (b)(5) (b)(6)
0.05	1/25/24	V-F	6	(b)(5) (b)(5) (b)(6)
0.06	2/9/24	Appendix B	8	(b)(5) (b)(5) (b)(6)
0.07	2/9/24	Appendix C	9	(b)(5) (b)(6) (b)(6)
0.08	2/22/24	Appendix B	8	(b)(5) ((b)(6)
0.09	2/27/24	I	3	(b)(5) (b)(5) (b)(6)
0.10	3/5/24	All	N/A	(b)(5)
0.11	3/7/24	Appendix B	8	(b)(5)
0.12	3/18/24	Appendix B	8	(b)(5) (b)(5) (b)(6)
1.00	3/19/24	All	All	(b)(5) (b)(5) (b)(6)
1.01	4/3/24	Appendix B	8	(b)(5) (b)(6)
1.02	4/15/24	All	All	(b)(5) (b)(5) (b)(6)
1.03	5/15/24	All	All	(b)(5) (b)(5) (b)(6)

1.04	6/20/24	IV-B	4	(b)(5)
1.05	8/29/24	All	All	(b)(5) d
1.06	9/4/24	Appendix B	8	(b)(5) (b)(6)

APPENDIX B: MEMBERSHIP

Role	Name	Duty Title	Organization
Chair (Non-Voting)	Tanya J. Bradsher	VA Deputy Secretary	OSVA
Vice Chair (Voting)	Charles Worthington	Chief Technology Officer and VA Chief Artificial Intelligence Officer	OIT
Vice Chair (Voting)	Nadia Smith	Acting Chief Digital Health Officer	VHA
Voting	Joseph Nassar	Principal Deputy Assistant Secretary	HRA/OSP
Voting	Phillip Christy	Deputy Principal Executive Director	OALC
Voting	Nathan Sanfilippo	Principal Deputy Assistant Secretary	OEI
Voting	Susie Dossie	Executive Director, Office of Business Oversight	OM
Voting	Nathan Maenle	Chief Diversity Officer	OSVA
Voting	Richard Chandler	Deputy Under Secretary for Management	NCA
Voting	Paul Shute	Principal Deputy Under Secretary for Benefits	VBA
Voting	Barbara Morton	Deputy Chief Veterans Experience Officer	VEO
Advisor	Nina Tann	Executive Director	BVA
Advisor	(b)(6)	Chief of Staff	OCLA
Advisor	Michael Hogan	Deputy General Counsel	OGC
Advisor	(b)(6)	Deputy Assistant Inspector General for Audits	OIG
Advisor	(b)(6)	Director of Digital Media Engagement	OPIA
Advisor	Kimberly Osborne	Executive Director	OSDBU
Advisor	Stephania Griffin	Director, Information Access, and Privacy Office	VHA

APPENDIX C: ALIGNED WORKSTREAMS

Workstream	Primary Contact	Organization
AI Operations Directorate	Kimberly McManus	OIT/OCTO
AI Policy Working Group	(b)(6)	OIT/OCTO
AI Workforce Working Group	Tracey Therit	HRA/OSP

APPENDIX D: TERMS AND DEFINITIONS

1. **Artificial Intelligence:** As cited in Office of Management and Budget Memorandum 24-10, section 238(g) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 states the following:
   a. Any artificial system that performs tasks under varying and unpredictable circumstances without significant human oversight, or that can learn from experience and improve performance when exposed to data sets.
   b. An artificial system developed in computer software, physical hardware, or other context that solves tasks requiring human-like perception, cognition, planning, learning, communication, or physical action.
   c. An artificial system designed to think or act like a human, including cognitive architectures and neural networks.
   d. A set of techniques, including machine learning, that is designed to approximate a cognitive task.
   e. An artificial system designed to act rationally, including an intelligent software agent or embodied robot that achieve goals using perception, planning, reasoning, learning, communicating, decision making, and acting.

   Office of Management and Budget adds the following technical context for interpretation of the definition above:
   a. This definition of artificial intelligence encompasses, but is not limited to, the artificial intelligence technical subfields of machine learning (including, but not limited to, deep learning as well as supervised, unsupervised, and semi-supervised approaches), reinforcement learning, transfer learning, and generative artificial intelligence.
   b. This definition of artificial intelligence does not include robotic process automation or other systems whose behavior is defined only by human-defined rules of that learn solely by repeating an observed practice exactly as it was conducted.
   c. For this definition, no system should be considered too simple to qualify as a covered artificial intelligence system due to a lack of technical complexity (e.g., the smaller number of parameters in a model, the type of model, or the amount of data used for training purposes).

2024 Agency AI Reporting per EO 14110 - AI Use Case Inventory Form Import

Section 1: Use Case Identifiers

Use Case ID	Use Case Name	Agency	Bureau	Use Case Topic Area	Other (Use Case Topic Area)	Is the AI use case found in the below list of general commercial AI products and services?	What is the intended purpose and expected benefits of the AI?	Describe the AI system's outputs.	Stage of Development	Is the AI use case rights-impacting, safety-impacting, both, or neither?
VA-26	Evolv WDS - DSSO	VA	VHA: Veterans Health Adm	Law & Justice		Creating visual representations of data sets for reports and presentations using AI.	Using heat map technology to identify heat signature	Areas of interest for a heat map that include objects th	Operation and Maintenance	Both
VA-52	VA Chat Copilot Meta Pilot	VA	OIT: Office of Information	Mission-Enabling (internal agency support)		Improving the quality of written communications using AI tools.	Administrative efficiency for VA employees.	Chat Copilot is a generative AI interface that allows use	Acquisition and/or Development	Neither
VA-77	Avigilon Camera/Search Function - DSSO	VA	VHA: Veterans Health Adm	Law & Justice		Searching for information using AI.	A search function in a security video surveillance syste	Video or picture of requested searches from the video	Operation and Maintenance	Both
VA-61	CareCentra Next Level Personalized AI Heal	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	This is an evidence based, randomized control trialed AI	solution that focuses on precision nudging. It is intend	Implementation and Assessment	Neither
VA-118	SafePointe WDS - DSSO	VA	VHA: Veterans Health Adm	Law & Justice		Creating visual representations of data sets for reports and presentations using AI.	Heat map detection for weapon detection software.	Areas of interest for a heat map that include objects th	Retired	Both
VA-1387	GE Kelenis	VA	VHA: Veterans Health Adm	Health & Medical		Creating visual representations of data sets for reports and presentations using AI.	Kelenis V leverages AI to accurately segment organs fo	Provide patient dosimetry calculations.	Operation and Maintenance	Both
VA-130	Genesys Cloud Contact Center	VA	OIT: Office of Information	Mission-Enabling (internal agency support)		Transcribing and summarizing a recorded meeting or interview using AI.	Assist staff with knowledge based recommendations,	Most of genesys outputs are surfacing knowledge to as	Acquisition and/or Development	Neither
VA-158	Verkada Camera - DSSO	VA	VHA: Veterans Health Adm	Law & Justice		Searching for information using AI.	Video search function inside a physical security camer	Video and images from the AI searches inside the physi	Acquisition and/or Development	Both
VA-162	MRI - GE Signa Artist	VA	VHA: Veterans Health Adm	Health & Medical		Creating visual representations of data sets for reports and presentations using AI.	AIR™ Recon DL is a deep-learning-based reconstructio	MRI image reconstruction	Operation and Maintenance	Both
VA-171	Google Cloud Platform - CCAI / Dialogflow	VA	OIT: Office of Information	Government Services (includes Benefits and Service Delivery)		None of the Above	to allow for better self service options to veterans to s	the output of GCP voice/chat is text to speech (TTS) an	Acquisition and/or Development	Neither
VA-200	Axon Body Camera and DMS - DSSO	VA	VHA: Veterans Health Adm	Law & Justice		Searching for information using AI.	To be able to search the data repository with better re	To have better outputs in searching the systems data r	Operation and Maintenance	Both
VA-204	Ultrasound - GE Logic E10	VA	VHA: Veterans Health Adm	Health & Medical		Creating visual representations of data sets for reports and presentations using AI.	Auto Preset Assistant Automatically activates the corr	Clinician decision support and workflow error reductio	Operation and Maintenance	Both
VA-216	Smart AI Bot Assistant	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	A machine learning and natural language processing al	Smart Responder Chat Bot Use Case #1 – Real time res	Initiated	Rights-impacting
VA-245	Radiology - Siemens PSID Max	VA	VHA: Veterans Health Adm	Health & Medical		Creating visual representations of data sets for reports and presentations using AI.	Bone supression: Supresses bones on digital images a	Increase radiology digital image quality.	Operation and Maintenance	Both
VA-257	Enterprise Precision Scanning and Indexing	VA	VHA: Veterans Health Adm	Health & Medical		Summarizing the key points of a lengthy report using AI.	Generative AI required for summarization and note cr	The output generates a summary of the patient health	Acquisition and/or Development	Neither
VA-294	Nursing Proficiency Coach & Nurse Proficien	VA	VHA: Veterans Health Adm	Education & Workforce		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-372	Parable 3D Wound Care Management Syste	VA	VHA: Veterans Health Adm	Health & Medical		Creating visual representations of data sets for reports and presentations using AI.	[illegible]	[illegible]	Operation and Maintenance	Both
VA-380	VEO Virtual Analyst Proof of Concept	VA	OIT: Office of Information	Government Services (includes Benefits and Service Delivery)		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-413	GE Portable Critical Care Suite 2.x	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-421	Patient Care Systems Integration Program (	VA	VHA: Veterans Health Adm	Health & Medical		Transcribing and summarizing a recorded meeting or interview using AI.	[illegible]	[illegible]	Implementation and Assessment	Both
VA-462	Billing Claims Prediction	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-503	ScienceLogic Artificial Intelligence Operatio	VA	OIT: Office of Information	Other	Cloud	None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-540	ECG/EKG Machines- Interpretation of Resul	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-544	Appointment Comments Categorization	VA	OIT: Office of Information	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Safety-impacting
VA-659	TeraRecon	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-708	Ambient AI scribe	VA	VHA: Veterans Health Adm	Health & Medical		Transcribing and summarizing a recorded meeting or interview using AI.	[illegible]	[illegible]	Initiated	Both
VA-790	Pension Optimization Initiative (POI)	VA	VBA: Veterans Benefits Ad	Government Services (includes Benefits and Service Delivery)		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Rights-impacting
VA-913	Limited Use of Azure Speech Services in PET	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-954	Medallia SaaS - VSignals and ESignals	VA	VEO: Veterans Experience	Other	Medallia is a customer experie	None of the Above	[illegible]	[illegible]	Operation and Maintenance	Safety-impacting
VA-1069	AGFA Dose Monitor system	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1114	Volpara Imaging Patient Hub	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1159	Identity Governance and Administration (IG	VA	OIT: Office of Information	Mission-Enabling (internal agency support)		Identifying unusual patterns in system logs from a single incident report using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-1200	VET-HOME Contact Center AI	VA	OIT: Office of Information	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Initiated	Neither
VA-1237	Beckman Coulter DxH 800	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1323	UiPath Document Understanding	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-1380	Potential Fraud or Waste	VA	OM: Office of Managemen	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-1442	Roche Digital Pathology	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-1475	Activity recognition using wearable sensors	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Safety-impacting
VA-1581	VCA & PPMS Chatbot	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		Searching for information using AI.	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-1585	AgileMD eCART Clinical Deterioration Mode	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1647	PINGOO.AI	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-1648	Persyst 14 EEG Review And Analysis Softwa	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1684	Computer Aided Detection (CADe) of Neopl	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1729	Digizens	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-1768	TrueFidelity CT Deep Learning Image Recon	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1770	Pangaea	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-1803	AIEOC	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1811	Cogitativo	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-1815	Analytics, Data, and Decision Support Unifie	VA	OALC: Office of Acquisition	Other	Data Analysis	None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-1848	iCAD ProFound AI	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-1887	VA Section 508 Office URL Ownership Predi	VA	OIT: Office of Information	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-1934	Circle CVI42	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-1938	National Cemetery Administration (NCA) Au	VA	NCA: National Cemetery A	Government Services (includes Benefits and Service Delivery)		Inputting large amounts of data from paper forms into a digital system using AI.	[illegible]	[illegible]	Operation and Maintenance	Rights-impacting
VA-2108	VA CART Adenoma Detection NLP	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2143	Call Center Knowledge Navigator	VA	VBA: Veterans Benefits Ad	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-2184	National Training Team | Schools — FAQ Di	VA	VBA: Veterans Benefits Ad	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-2266	National Training Team | Schools — FAQ Di	VA	VBA: Veterans Benefits Ad	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-2307	Audit of Service Connection Designations A	VA	VHA: Veterans Health Adm	Government Services (includes Benefits and Service Delivery)		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-2336	PsychCorpCenter	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-2348	ReflexAI	VA	VHA: Veterans Health Adm	Education & Workforce		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2377	Prostate Cancer, Genetic Risk, and Equitabl	VA	VHA: Veterans Health Adm	Other	Research	None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-2422	Using AI to enhance/augment classification	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-2426	App feedback model for NLP tasks	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2440	TERA Memorandum Automation	VA	OIT: Office of Information	Government Services (includes Benefits and Service Delivery)		Searching for information using AI.	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2459	BreastDive	VA	VHA: Veterans Health Adm	Law & Justice		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-2463	Using AI to weekly monitoring of any harm	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-2500	Podimetrics	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-2504	Thematic Analysis of Chief Resident in Qual	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-2508	My HealtheVet VSignals Main Improvement	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2512	ESD-Speech Sentiment and Analytics	VA	OIT: Office of Information	Mission-Enabling (internal agency support)		Transcribing and summarizing a recorded meeting or interview using AI.	[illegible]	[illegible]	Initiated	Neither
VA-2545	Privacy Act Automation Services - Disclosur	VA	VBA: Veterans Benefits Ad	Government Services (includes Benefits and Service Delivery)		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-2549	Sentiment analysis for app feedback	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2553	ESD-Predictive Intelligence	VA	OIT: Office of Information	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-2582	AI Health Coach	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2623	Verathon Prime Plus	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-2672	App Feedback categorization model	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2713	LINQ and LINQ II Loop Recorder	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-2717	VA.gov Chatbot: Use of AI for summative an	VA	OIT: Office of Information	Government Services (includes Benefits and Service Delivery)		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2754	ZIO PATCH HEART MONITOR	VA	VHA: Veterans Health Adm	Health & Medical		Creating visual representations of data sets for reports and presentations using AI.	[illegible]	[illegible]	Operation and Maintenance	Both
VA-2758	Caller intent classification using Google Dial	VA	OIT: Office of Information	Government Services (includes Benefits and Service Delivery)		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Safety-impacting
VA-2791	Orch	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-2795	Machine Algorithm for Report Surveillance	VA	OEHRM: Office of Electroni	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Initiated	Neither
VA-2828	Pharmacy AI Managed Inventory System (P	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Initiated	Safety-impacting
VA-2838	Silverberry Surgery Planning AI	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-2889	ICU CIS/ARK PDF Medical Entity and Clinical	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Safety-impacting
VA-2910	BlueTeam AI	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		Identifying unusual patterns in system logs from a single incident report using AI.	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-3004	OAWP Investigative, Analytics, and Reportin	VA	OAWP: Office of Accountal	Mission-Enabling (internal agency support)		Transcribing and summarizing a recorded meeting or interview using AI.	[illegible]	[illegible]	Initiated	Neither
VA-3033	Multi-Modal Digital Image Exchange - AI (M	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Safety-impacting
VA-3045	VA Supply Chain Knowledge Management	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-3082	Clinical outcomes for asynchronous teleder	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-3086	VA TryOpenAI	VA	OIT: Office of Information	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-3119	Lyssn for Mental Health	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-3131	SOMATOM go.Up; SOMATOM go.Now; SO	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3184	HCD User Feedback Summary, Analysis, an	VA	VHA: Veterans Health Adm	Health & Medical		Summarizing the key points of a lengthy report using AI.	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-3205	3M/Solventum 360 Encompass Computer A	VA	VHA: Veterans Health Adm	Health & Medical		Summarizing the key points of a lengthy report using AI.	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-3213	Vivid iq	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3254	Vivid E80/ Vivid E90/ Vivid E95	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3291	Payment Redirect Fraud (PRF) Model	VA	VBA: Veterans Benefits Ad	Government Services (includes Benefits and Service Delivery)		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Rights-impacting
VA-3295	EchoPAC Software Only, EchoPAC Plug-in	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3320	Using Partially Observed Markov Decision P	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Initiated	Both
VA-3324	Microsoft Power Automate and AI	VA	VHA: Veterans Health Adm	Transportation		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-3365	IVC Access Transformation Transformative	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-3369	ECG system software	VA	VHA: Veterans Health Adm	Health & Medical		Creating visual representations of data sets for reports and presentations using AI.	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3373	Avicenna ICH	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3414	Densitas Density AI	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3418	CLARUS	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3455	Riverain ClearRead CT	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3488	Clinical Key | Elsevier	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Initiated	Both
VA-3492	ACS NSQIP Risk Score	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3498	Avicenna LVO	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Both
VA-3503	Yes Max	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3537	Transpara Breast Care	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Both
VA-3541	KEIF-AW5801, Angio Workstation (Alphenix	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3574	Blacklist Code research	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		Creating visual representations of data sets for reports and presentations using AI.	[illegible]	[illegible]	Initiated	Neither
VA-3578	Synthetic Data Creation	VA	VBA: Veterans Benefits Ad	Education & Workforce		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-3619	Billie GPT	VA	VBA: Veterans Benefits Ad	Education & Workforce		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-3623	X3DHT with Slide Loader with Full Field Fo	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3664	WRDensity by Whiterabbit.ai	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3705	Workflow Box	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3738	BTSSS 3542 Review	VA	VHA: Veterans Health Adm	Government Services (includes Benefits and Service Delivery)		Inputting large amounts of data from paper forms into a digital system using AI.	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-3748	Withings Scan Monitor 2.0	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3775	HTM LLM	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-3783	Clinician-Administered PTSD Scale for DSM-	VA	VHA: Veterans Health Adm	Education & Workforce		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-3787	WellDoc BlueStar	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3824	Electronic Virtual Assistant (e-VA)	VA	VBA: Veterans Benefits Ad	Government Services (includes Benefits and Service Delivery)		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3828	WAVE Clinical Platform	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3869	VX1, VX1+	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3898	Sybil - Lung Cancer Prediction Model by MI	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-3908	eCaremanager (Philips)	VA	VHA: Veterans Health Adm	Health & Medical		Creating visual representations of data sets for reports and presentations using AI.	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3920	VUNO Med-DeepBrain	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3930	Policy Aid	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		Searching for information using AI.	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-3961	Voluson Expert 22, Voluson Expert 20, Volu	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-3982	Volta AF-Xplorer	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4066	Biotronik Home Monitoring System	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Initiated	Both
VA-4089	Synthetic Data Generation. Experimenting	VA	VHA: Veterans Health Adm	Other	Research: creation of synthetic	None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-4107	CareLink Home Monitoring	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Initiated	Both
VA-4148	Nuance Dragon Medical One (DMO)	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		Inputting large amounts of data from paper forms into a digital system using AI.	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4152	Stratification Tool for Opioid Risk Mitigatio	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4156	Vitrea CT Brain Perfusion	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4183	Deep-Learning approaches to develop card	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-4187	Vereos PET/CT	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4234	Recovery Engagement and Coordination for	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4238	Venue; Venue Fit; Venue Go	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4279	Velacur	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4316	2268 Next Generation (2268NextGen)	VA	OSVA: Office of the Secret	Other	This system supports Federal o	Inputting large amounts of data from paper forms into a digital system using AI.	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-4320	Syngo Application Software	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4349	Operationalizing Coronary Artery Calcium C	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-4353	Rapid AI	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4361	Spine Planning (2.0), Elements Spine Planni	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4390	VRS Employment Support	VA	VHA: Veterans Health Adm	Education & Workforce		Improving the quality of written communications using AI tools.	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-4431	Classifying the reportability of and extractio	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-4435	Post discharge 30-day readmission or death	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-4439	Using Artificial Intelligence to Predict Suicid	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-4443	RayStation 12B	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4472	Identify access to genetic testing in Veteran	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-4513	Classify clinical pathway for cancer patients	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-4521	Enterprise Command Center - Generative A	VA	OIT: Office of Information	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-4554	Extract patients' diagnosis information and	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-4582	Adobe Creative Cloud	VA	VHA: Veterans Health Adm	Health & Medical		Creating visually appealing presentations using AI-driven design suggestions.	[illegible]	[illegible]	Operation and Maintenance	Neither
VA-4588	QLAB Advanced Quantification Software	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4585	Identify cancer patients symptom burden, i	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Rights-impacting
VA-4599	Ambulatory heart rhythm monitoring	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4603	Insights Engine	VA	VEO: Veterans Experience	Mission-Enabling (internal agency support)		Summarizing the key points of a lengthy report using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-4607	Philips EPIQ Diagnostic Ultrasound System,	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4640	Glassbeam Clinsights	VA	VHA: Veterans Health Adm	Health & Medical		Identifying unusual patterns in system logs from a single incident report using AI.	[illegible]	[illegible]	Implementation and Assessment	Both
VA-4644	VX Insights Hub Agent	VA	VEO: Veterans Experience	Mission-Enabling (internal agency support)		Summarizing the key points of a lengthy report using AI.	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-4689	OPTIS Mobile Next Imaging System, OPTIS I	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4722	Automated Decision Support	VA	VBA: Veterans Benefits Ad	Government Services (includes Benefits and Service Delivery)		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4726	Compliance Made Easy (CME) Cloud Optimi	VA	OIT: Office of Information	Other	This may fall under governmen	Improving the quality of written communications using AI tools.	[illegible]	[illegible]	Initiated	Neither
VA-4730	O-arm O2 Imaging System	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4763	Mail Automation Services	VA	VBA: Veterans Benefits Ad	Government Services (includes Benefits and Service Delivery)		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Rights-impacting
VA-4771	NeuroQuant	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4804	Master Claims Assistance Tool (M-CAT)	VA	VBA: Veterans Benefits Ad	Government Services (includes Benefits and Service Delivery)		Searching for information using AI.	[illegible]	[illegible]	Acquisition and/or Development	Rights-impacting
VA-4812	MAGNETOM Vida; MAGNETOM Lumina; M	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4923	3D Quorum	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4935	Mosaic-Structural Heart Module	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-4964	Intelligent 2D	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5005	QV CAD	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-5009	FlexLine: Detect patterns and make correct	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)		None of the Above	[illegible]	[illegible]	Initiated	Neither
VA-5013	Medical Imaging Auto-segmentation	VA	VHA: Veterans Health Adm	Health & Medical		Searching for information using AI.	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5017	FFRangio	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5046	Quantra	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5050	VSTOne — AI-Driven Patient Monitoring and	VA	VHA: Veterans Health Adm	Health & Medical		Identifying unusual patterns in system logs from a single incident report using AI.	[illegible]	[illegible]	Initiated	Both
VA-5054	Surveillance and Reporting of Suicidal Ideat	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-5058	FastStroke, CT Perfusion 4D	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5087	Koios	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-5095	Evaluation of Autonomous Assistive Feeding	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Safety-impacting
VA-5136	Using AI to read PDFs and parse the inform	VA	VHA: Veterans Health Adm	Health & Medical		Inputting large amounts of data from paper forms into a digital system using AI.	[illegible]	[illegible]	Initiated	Neither
VA-5140	Discovery MI Gen2	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5169	Genius AI	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5173	Implementation of a Severe COVID-19 Risk	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Both
VA-5181	CVI42	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5214	Discharge Predictive Model	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Acquisition and/or Development	Neither
VA-5218	HSRD IIR 19-089 Optimizing Renin Angioten	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Neither
VA-5222	CT CoPilot	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5283	Cranial Navigation, Navigation Software Cra	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5333	Aquilion ONE (TSX-305A/6) V8.9 With ACE	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Implementation and Assessment	Both
VA-5427	CellaVision DM1200 with the body fluid app	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5484	Nedber reports QA	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5488	CARTO 3 EP Navigation System Software V8	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5501	Care Assessment Needs (CAN) Score	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both
VA-5509	Cartesion Prime (PCD-1000A/3) V10.15	VA	VHA: Veterans Health Adm	Health & Medical		None of the Above	[illegible]	[illegible]	Operation and Maintenance	Both

VA-5542	VA CART Percutaneous Coronary Interventi	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	The VA CART SYNTAX risk model predicts 30-day post-	The calculated score indicates a risk of major adverse c	Operation and Maintenance	Both
VA-5559	Cardiac CT Function Software Application	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-5579	Falls Prediction Tool	VA	VHA: Veterans Health Adm	Government Services (includes Benefits and Service Delivery)	None of the Above	Background: Pact Act Co-Pay exemption determinatio	Automatically generate a binary output that indicates w	Acquisition and/or Development	Safety-impacting
VA-5583	VA CART Percutaneous Coronary Interventi	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	The VA CART mortality risk model is based on logistic r	Post-PCI 30-day mortality	Operation and Maintenance	Both
VA-5620	Pact Act Co-Pay Exemption Prediction Tool	VA	VHA: Veterans Health Adm	Government Services (includes Benefits and Service Delivery)	None of the Above	Background: Pact Act Co-Pay exemption determinatio	Automatically generate a binary output that indicates w	Acquisition and/or Development	Rights-impacting
VA-5624	VA CART Percutaneous Coronary Interventi	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	The VA CART nephropathy risk model is based on logis	Post-PCI acute kidney injury	Operation and Maintenance	Both
VA-5628	Purchase Order Filing	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)	Digitizing text from scanned documents or smart forms for archival purposes using AI.	We use Microsoft Power Automate's AI builder to file	The AI puts the document into a PDF on Sharepoint anc	Operation and Maintenance	Neither
VA-5632	Brainlab Elements Image Fusion, Contouring	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-5665	VA CART Myocardial Ischemia NLP	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	Extracts myocardial ischemia information in VistA usin	Results of the NLP contain 0 indicating negative stress t	Operation and Maintenance	Neither
VA-5706	VA CART Ejection Fraction NLP	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	Extracts ejection fraction (EF) information in VistA usir	Results of the NLP are separated by EF determination n	Acquisition and/or Development	Neither
VA-5714	BioPlex 2200 ANA Screen with Medical Deci	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-5788	VA CART Percutaneous Coronary Interventi	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	The VA CART bleeding risk model is based on logistic r	Post Percutaneous Coronary Intervention bleed prior to	Operation and Maintenance	Both
VA-5796	Biograph Vision, Biograph MCT Family Of PE	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-5825	Rythm Express	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	Predict potassium levels from ECG.	Potassium levels from ECG evaluation.	Acquisition and/or Development	Neither
VA-5837	AutoContour Model RADAC V3	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-5874	A computer vision framework (CVF) for the	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	Intended purpose: To develop a computer vision fram	The CVF can provide a decision for the given image (e.g	Acquisition and/or Development	Safety-impacting
VA-5903	Github Copilot	VA	OIT: Office of Information ;	Mission-Enabling (internal agency support)	Collaborating in real-time using AI-assisted tools in word processors.	The intended purpose of GitHub Copilot is to assist de	The AI system's outputs in this context would be: Code	Initiated	Neither
VA-5918	aPROMISE X	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-5956	AI coding	VA	VHA: Veterans Health Adm	Mission-Enabling (internal agency support)	Creating visual representations of data sets for reports and presentations using AI.	Increased Productivity: By automating routine tasks, b	Code Snippets: Automatically generated blocks of code	Initiated	Neither
VA-5960	Apkis 900, Apkis 800 and Apkis i700 Softwa	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-6001	Alignment System Cranial, Alignment Softw	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-6030	Dental - Dentsply Sirona CERE	VA	VHA: Veterans Health Adm	Health & Medical	Creating visual representations of data sets for reports and presentations using AI.	Intelligent automation enables a fast proposed dental	Dental reconstruction proposal.	Operation and Maintenance	Both
VA-6038	Fusion 2024 (JAWS/ZoomText)	VA	OIT: Office of Information ;	Mission-Enabling (internal agency support)	Searching for information using AI.	Allows blind and low vision employees to gain informa	Detailed descriptions and details of charts, graphs, tabl	Operation and Maintenance	Neither
VA-6042	Acumen Hypotension Prediction Index - EV1	VA	VHA: Veterans Health Adm	Health & Medical	None of the Above	FDA-cleared medical device to assist clinicians and imp	Described in FDA documentation for this device (https:,	Operation and Maintenance	Both
VA-6067	Xtract WDS - OSSD	VA	VHA: Veterans Health Adm	Law & Justice	Creating visual representations of data sets for reports and presentations using AI.	Heat map detection for weapon detection software.	Areas of interest for a heat map that include objects th	Acquisition and/or Development	Both

CATEGORY	EXAMPLES *(An AI use case is likely to fall into this category if it is used in one of these contexts or a substantively similar one. However, this list is not meant to be exhaustive of all use cases within a category.)*
Government Services (includes Benefits and Service Delivery)	AI used for improving access to government benefits. AI used for communicating with eligible recipients of government benefits, which includes: AI used for customer service, such as customer call centers, chatbots, and other virtual assistants, AI used for virtual voice response, AI used for language translation or assistive technology, or AI used as a feature or for the development of agency websites. AI used to assist the provision or processing of government benefits, including: AI used in Supplemental Nutrition Assistance Program (SNAP) and related programs, AI used in Medicare & Medicaid, including fraud prevention, AI used in unemployment benefits access, or AI used in Social Security, including fraud prevention. • AI used in the processing of housing grants and benefits, to conduct housing valuations, and in non-discrimination enforcement. AI used in public affairs and correspondence, such as for the solicitation or review of public comments.
Diplomacy & Trade	AI used in international development and humanitarian assistance. AI used when conducting foreign affairs. AI used in the logistical routing of international commerce.
Education & Workforce	AI used for employee training and professional development. AI used within the U.S. education system, such as online/virtual teaching platforms, lesson plan generation, and translation/accessibility features in the classroom. AI used for scholarship and financial aid processing. AI used in employee disability and accommodations processing. AI use for safety and workers compensation processing.
Energy & the Environment	AI used for energy innovation, adoption, or use. AI used in production or management of nuclear energy. AI used in the safety, security, or maintenance of energy plants and facility operations.
Emergency Management	AI used for prediction or response to emergencies, such as roadside emergencies, public health emergencies, or natural disasters.
Health & Medical	• AI used to assist in medical research, clinical trials, or drug and vaccine development. • AI used in medical devices. • AI used to assist with providing healthcare, such as filling prescriptions, telehealth platforms, or virtual care options. • AI used to analyze and process healthcare data, such as health records. • AI used for monitoring of patient biometrics, diet, mental health, etc. • AI used for early intervention screening, diagnostics, or treatment planning. • AI used in drug safety, such as drug labeling, monitoring adverse drug reactions, or predicting drug shortages. • AI used in healthcare facility physical security or cybersecurity. • AI used in veterans' healthcare.
Law & Justice	• AI used in domestic or international investigations, including forensics. • AI used in border protection activities, including border control or surveillance. • AI used in immigration and asylum services. • AI used for law enforcement activities.
Science & Space	AI used in computer sciences. AI used in earth sciences, such as geography, atmospheric, climatology & environmental sciences, geology, oceanography (excludes living creatures), natural resources, forestry, or water resource management. AI used in physical sciences, such as physics, astrophysics, or chemistry. AI used in life sciences, such as zoology, botany, or biology. AI used in space sciences and exploration, which includes planetary geology, spacecraft or satellite flights and explorations, or investigations of celestial objects.
Transportation	AI used in the movement of vehicles, whether on land, underground, at sea, or in the air. AI used for predictive infrastructure maintenance, such as runways, roads, or railways.
Mission-Enabling (internal agency support)	AI used in finance management, which includes: AI used to assist with internal budgeting processes, or AI used to manage and process payments. AI used for internal human resources management, which includes: AI used for payroll processes, AI used in hiring, or AI used for agency travel processing. AI used for facilities and property management, which includes: AI used for equipment maintenance, or AI used for facilities access and security. AI used for Information and Communications Technology, which includes: AI used to assist with help desk activities (chatbots, submitting tickets), or AI used in other general IT activities within an agency. AI used in agency cybersecurity and privacy-enhancing activities. AI used for administrative functions, which includes: ○ AI used for records management,

	○ AI used for FOIA response, or ○ AI use for internal investigations and audits, including OIG. AI used for project management. AI used to facilitate procurement processes and analyses, which includes: AI used for acquisition planning, including advance acquisition planning, AI use for market research, AI used for optimizing supplier selection, AI used for contract management and administration, or AI used for acquisition data analytics.
Other	Use this category only when other categories don't apply, and provide an alternative category.

APPENDIX B: Commercially-Dependent Use Cases

Inputting large amounts of data from paper forms into a digital system using AI.
Identifying and cataloging items in a storage room using AI-driven image recognition.
Transcribing and summarizing a recorded meeting or interview using AI.
Scheduling meetings or appointments or setting reminders using AI.
Prioritizing and categorizing incoming emails using AI.
Scheduling and managing social media posts using AI.
Logging and analyzing time spent on tasks using AI-powered time management tools.
Identifying unusual patterns in system logs from a single incident report using AI.
Summarizing the key points of a lengthy report using AI.
Searching for information using AI.
Digitizing text from scanned documents or smart forms for archival purposes using AI.
Improving the quality of written communications using AI tools.
Collaborating in real-time using AI-assisted tools in word processors.
Creating visually appealing presentations using AI-driven design suggestions.
Creating visual representations of data sets for reports and presentations using AI.
Curating news articles and updates based on user preferences using AI.
Planning travel routes using AI-driven map applications.
Finding and booking travel accommodations using AI-powered platforms.
Unlocking smartphones or other devices without the need for passwords or PINs using AI-based facial recognition technology
None of the Above

APPENDIX C: High-Impact Service Provider (HISP) Public-Facing Services

Bureau of Consular Affairs	Applying for a U.S. passport
	Accessing international travel information services (via travel.state.gov)
Bureau of Indian Affairs	Accessing a probate order
	Receiving trust assets
Bureau of Trust Funds Administration	Managing Individual Indian Monies (IIM) accounts
	Accessing beneficiary services
Centers for Medicare & Medicaid Services	Getting started with Medicare
	Understanding eligibility results and next steps after the application
Community Development Financial Institutions (CDFI) Fund	Checking eligibility and applying for Medicaid
	Accessing capital and financial products to serve communities in need
Customs and Border Protection	Enabling trusted travelers to enter the country quickly with Global Entry (GE)
	Improving import-related data sharing and transfers through CBP's Automated Commercial Environment (ACE)
Defense Counterintelligence and Security Agency	Navigating the application process for a federal background investigation
Departmental Offices	Accessing Federal benefit payments electronically
Employee Benefits Security Administration – DOL	Using website resources to maximize retirement and health benefits
	Using website resources to assist organizations with compliance
Employment and Training Administration – DOL	Searching for careers, training, and workforce services using CareerOneStop
	Using CareerOneStop APIs to integrate into web content
Farm Service Agency – USDA	Applying for direct and guaranteed real estate and operating loans to start, maintain, and expand a family farm
Federal Emergency Management Agency – DHS	Applying for and receiving disaster assistance
	Filing a claim under the National Flood Insurance Program
Federal Employment Service – OPM	Applying to Federal job opportunities
	Seeking assistance with the Federal job application process from the USAJOBS help desk
Federal Student Aid – ED	Applying for Federal student aid
	Applying for Public Service Loan Forgiveness (PSLF)
	Applying for Saving on a Valuable Education (SAVE)
Fish and Wildlife Service – DOI	Planning a trip to a national wildlife refuge or public fish hatchery using fws.gov
Food and Nutrition Service – USDA	Using WIC food benefits
Forest Service – USDA	Getting a recreation special use permit
Housing and Urban Development – HUD	Seeking information about Federal Housing Administration (FHA) loan programs and loss mitigation services
	Filing a housing discrimination complain
Indian Health Service – HHS	Accessing Purchased/Referred Care
Internal Revenue Service – TREAS	Filing an individual tax return
	Managing an individual online account
International Trade Administration – DOC	Service details are forthcoming
National Park Service – DOI	Planning trips and exploring National Parks using the NPS Digital Experience
	Discovering and applying to volunteer service opportunities on Volunteer.gov
Natural Resources Conservation Service – USDA	Applying for the Environmental Quality Incentives Program (EQIP)
Occupational Safety and Health Administration – DOL	Applying for Voluntary Protection Programs recognition for exemplary safety systems
	Seeking reapproval for maintaining Voluntary Protection Programs-level safety system

Office of Workers' Compensation Programs – DOL	Applying for compensation benefits under Energy Employees Occupational Illness Compensation Program Act (EEOICPA)
	Applying for medical benefits related to accepted conditions under EEOICPA
	Filing a workers' compensation claim under the Federal Employees Compensation Act
Public Experience Portfolio – GSA	Finding government information quickly (in English and Spanish)
	Determining eligibility and referrals
Recreation.gov – USDA	Reserving a campsite on Recreation.gov
	Entering a lottery for high-demand activity
Retirement Services – OPM	Applying for Federal civilian retirement
	Managing a Federal annuitant retirement account
Rural Development – USDA	Filing an application under the OneRD Guarantee Loan Initiative
	Receiving technical assistance for broadband deployment
Small Business Administration – SBA	Applying for a Small Business Administration disaster loan
	Applying for a Federal small business contracting certification
Social Security Administration – SSA	Applying for a replacement Social Security card
	Filing for Social Security retirement benefits
	Obtaining audit disability benefits
Transportation Security Administration – DHS	Completing TSA passenger screening
	Getting help from TSA
U.S. Agency for International Development – USAID	Improving the partner experience for business and industry (i.e., the private sector)
	Simplifying the USAID partnership process
U.S. Citizenship and Immigration Services – DHS	Increase naturalization for eligible legal permanent residents
	Enable increased self-service through an expansion of digital costumer service tools
United States Census Bureau	Responding to a Census Bureau administered survey
	Obtaining Census Bureau statistics online
United States Patent and Trademark Office	Applying for a patent
	Applying to register a trademark
Veterans Benefits Administration	Accessing VBA education benefits
	Using the VBA decision review process
	Accessing disability compensation benefits
Veterans Health Administration	Utilizing in-person primary care
	Utilizing inpatient medical/acute care

From: Worthington, Charles
Sent: Fri, 14 Mar 2025 16:40:45 +0000
To: (b)(6) C. (GovCIO)
Cc: (b)(6) (governmentcio Llc); OCTO Communications
Subject: Re: NAAC Slide Review
Attachments: AI at VA_OCTO_NAAC_June2024_NAII[4].pptx

I just made some updates – I want to start with some more optimistic stuff, and then we can get into the standard deck.

Also, remember that we already presented to this group last year (slides attached from the last one).

From: (b)(6) (GovCIO) <(b)(6) @va.gov>
Date: Thursday, March 13, 2025 at 9:25 AM
To: Worthington, Charles <(b)(6) @va.gov>
Cc: (b)(6) (governmentcio Llc) <(b)(6) @va.gov>, OCTO Communications (b)(6) @va.gov>
Subject: NAAC Slide Review

Good morning Charles,

Your NAAC meeting is coming up on the 26th. We've put together a slide deck here for your review:
NAAC_A_Peek_Into_AI_at_VA_March262025.pptx

This NAAC presentation will be alongside Dr. (b)(6) We plan to reach out to his team following your review to see if they have slides they would like to include. Please let us know if there are any specific topics you'd like us to request he discuss, and we'd be happy to coordinate.

Additionally, we are asking that you ONLY review content. We are still working to finalize the template and conduct a 508 remediation, so much of the design is set to change.

Please let me know if you have any questions or concerns, and I'm looking forward to your feedback.

Thank you,
(b)(6)

(b)(6) MBA (HE/HIM)
COMMUNICATIONS SUPPORT
OFFICE OF THE CHIEF TECHNOLOGY OFFICER
DEPARTMENT OF VETERANS AFFAIRS

TIS EXCEEDING EXPECTATIONS

OPERATIONALIZING AI AT THE VA

Charles Worthington

Chief Artificial Intelligence Officer, Chief Technology Officer

(b)(6)

Acting Director, National Artificial Intelligence Institute

National Academic Affiliations Council (NAAC) June 25, 2024

VA | U.S. Department of Veterans Affairs
Office of Information and Technology

What is the scale of the VA?

9.1 million patients

VA is the largest integrated healthcare system in the U.S.

120,000 clinicians

The majority of U.S. doctors and nurses do at least some of their training at VA.

2 million claims processed per year

Providing benefits to more than 6 million Veterans, Survivors, and their families.

1,000,000+ genomic donations

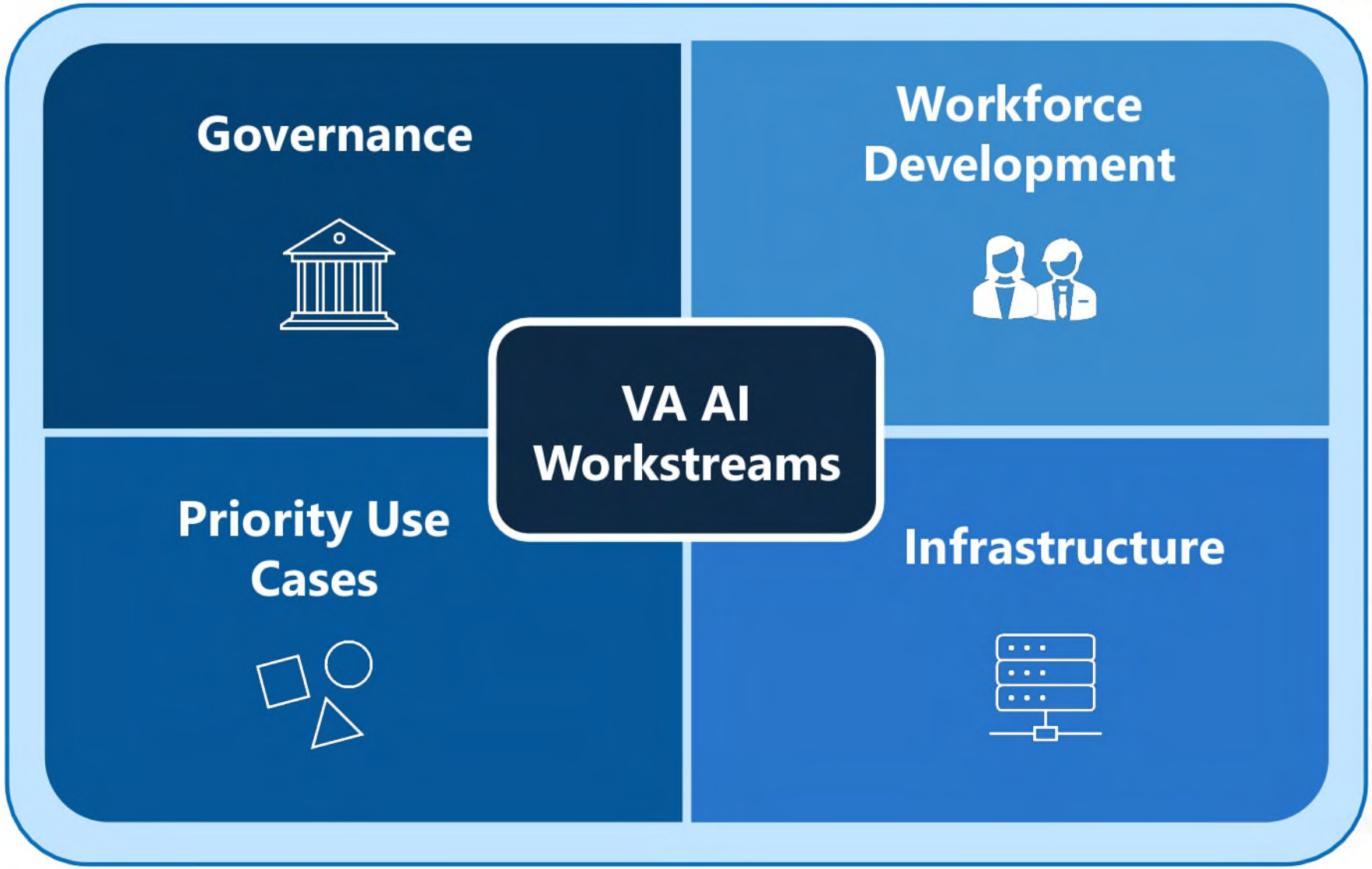
VA has the largest genomic database tied to medical records in the world.

1,200+ medical facilities

Veterans receive care across all U.S. states and territories.

400k+ employees

More than 1 in 1000 U.S. adults is a VA employee



VA AI Workforce Development

Communication

Training

Hiring

VA AI Governance

AI Governance Council

Membership across VA, including Privacy, Cybersecurity, Data, Ethics, etc.

Public AI Use Case Inventory

2023 Inventory:

- 128 use cases
- 40 in Operations

Federal Requirements for 'high risk' AI

- AI impact assessment
- Assess in real-world context
- Monitor & mitigate discrimination

Due: December 2024

AI Policy & Guidance

AI Use Cases Collection

- VA is required to keep an inventory of AI use cases and conduct risk assessments. Our goal is to effectively gather information on AI use cases from various teams across the VA, promoting transparency, collaboration, and innovation in AI initiatives.
- VA employees have a shared responsibility to document AI use cases

How to Submit Your Use Case:

1. **Complete the** AI Use Case intake survey :Provide details about your AI project, its objectives, outcomes, and any challenges faced.
3. **Submit Your Entry**: Your submission will be reviewed, and you may be contacted for further information.

Join us in this exciting journey and help us harness the full potential of AI to serve our Veterans better.

AI Use Case Inventory & Review

Awareness & transparency

- Resource for people internally, increased collaboration
- Report AI use cases annually to OMB and the public.

Ensure AI deployed at VA is Trustworthy & Responsible

Initial assessment

- Attest that the safety and rights impacting of all AI use cases at VA have been thoroughly assessed and are compliant.

Ongoing monitoring

- Tracking modifications, waivers and discontinuations of AI use cases
- Periodically monitor AI use cases to ensure they continue to meet regulatory standards and operational expectations.

Categories of AI Use Cases at VA

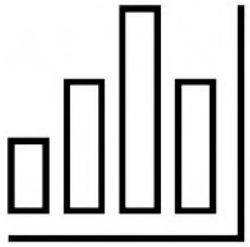
AI use cases not subject to OMB inventory

- Non-operational Research
- Commercial Off the Shelf (COTS) products without modifications that are not safety or rights impacting

AI use cases subject to OMB inventory

- 'High Risk' AI use cases
  - Safety impacting use cases
    - E.g., Significant impact on clinical care
  - Rights Impacting use cases
    - E.g., Significant impact on clinical care, benefits, hiring process
- 'Low Risk' AI use cases
  - Everything else

‘High Risk’ AI Impact Assessment

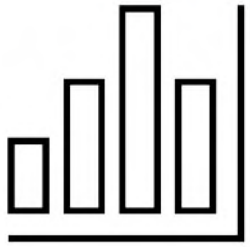


Is the model being trained on biased data?

Is the model itself algorithmically biased?

Is the model being implemented equitably?

Real-World Assessment and Mitigation



To mitigate biased training data, minimize gaps between training data and intended use population.

To mitigate algorithmic bias, compare performance metrics across demographic groups.

To ensure equitable implementation, identify proximal outcomes in service of distal outcomes.

Equitable Implementation Example

- VHA develops an AI model to identify veterans at high risk for a negative health outcome

- Real-world assessment determines that the model identifies this health outcome accurately across demographic groups

- VHA institutes proactive outreach towards flagged veterans to schedule appointments that mitigate health risk

- Without proactive outreach, this model only serves veterans with the time and resources to actively monitor their health status (inequitable implementation)

AI Use Case Review Process

Process and Timeline:

- **AI Use Case Intake (Form 1)**
  - **Objective:**
    - Initial VA-wide call for AI use cases
    - Entries evaluated to determine whether they need to be included in inventory, are duplicates, etc.
  - **Completion of Revisions:** August 1, 2024
  - **Link:** AI Intake Form
- **AI Use Case Questionnaire (Form 2)**
  - **Objective:** Detailed OMB-required questions
  - **Completion of Revisions:** September 1, 2024
- **Safety and Rights Impacting Questionnaire (Form 3)**
  - **Objective:** Collect information to assess the impact on Safety or Rights to make recommendations on determinations
  - **Possible Outcomes:** Approved, modifications required, extension required, waiver required, discontinuation.
  - **Completion of Revisions:** October 1, 2024
  - **Final Determinations:** October 15, 2024

VA AI Priority Use Cases

VA AI Focus Areas

- Decreasing Health Care Worker Burnout
- Improving the Veteran & Staff Experience
- Better Care for Patients

Example AI/ML in Operations at VA today

- A few risk prediction models, including for suicide risk & opioid overdose
- Veteran experience feedback
- Medical devices, primarily in radiology & gastroenterology

Example Pilots

- AI scribes
- External document integration into EHR
- Additional models to triage high risk patients
- Generative AI chat & document interface
- Policy navigation, contract drafting, message drafting
- Software code completion

AI Tech Sprint to Reduce Provider Burnout

Business need

- Physician burnout is a nationally recognized crisis in healthcare, which impacts quality of care, patient satisfaction, and costs of care. Addressing physician burnout is a major VA priority.
- Administrative tasks, such as clinical documentation in the electronic health record (EHR), are major contributors to physician burnout.
- Human scribes have been effective toward decreasing clinical documentation burden, increasing physician satisfaction, and decreasing physician time spent in the EHR during patient visits. However, notes written by human are variable in quality. In addition, scribes are costly, require time to train, and have high turnover.
- Ambient AI medical scribes and solutions to automate document processing show promise as potential solutions to reduce physician burnout.
- VA recently completed an AI Tech Sprint to identify promising vendors in this space, and intends to pilot several of these solutions at VA Medical Centers.

What are AI Tech Sprints?

- AI Tech Sprints provide a novel approach to innovation to meet Veteran needs
- AI Tech Sprints are three-month competitive engagements that foster collaboration between industry, academia, and the Department of Veterans Affairs (VA)
- We recently concluded two AI Tech Sprints around reducing provider burnout: Ambient Scribing and Community Care Document Processing
- **Executive Order 14110: "The Secretary of Veterans Affairs will… 5.2(f)(i) Within 365 days of the date of this order, host two 3-month nationwide AI Tech Sprint competitions"**

Ambient Scribing Track Overview

Goal

Create an AI-enabled tool that can extract transcripts and key details from ambient recordings of patient encounters in primary care, mental health, and specialty care settings within VA and then generate documentation for the encounter.

Desirable Features

- The ability to populate heterogenous existing note templates
- Discretely identify symptoms, diagnoses, orders, and recommendations implied by treatment plans
- Maintain performance across different accents, levels of background noise, and telehealth settings

Requirements

- System must leverage conversational and directed voice prompting engineered to generate real-time recommendations, retrieve patient and health system information, generate clinical decision support tools and integrate external predictive models.
- System must feature a high degree of security, including automatic deletion of local copies of recordings/transcripts stored on any local devices.
- The tool should generate a high-quality encounter note, summarizing the visit into a format that is both detailed and EHR agnostic and interfaced with the active VA EHR systems.

Community Care Records Track Overview

Goal

Develop an AI-based system capable of ingesting a diverse corpus of community care records, ranging from patient encounters to complex medical documents.

Requirements

The system should feature advanced entity recognition and medical text summarization capabilities that comply with VA resources and enterprise technology monitoring systems.

Output

A searchable, quality transcript that highlights significant events from episodes of care and engineered to integrate VA CDW Delta Lake (Summit Data Platform Health Information Exchange documents) and other VA data sources.

Additionally, the system should be scalable and offer advanced features like:

- A hyperlinked table of contents
- Development of a concise summary narrative for documents exceeding 20 pages
- Source vetting for optimal original sources
- Extraction of structured data elements (e.g., occurrence and results of preventive health activities, such as immunizations given, cervical cancer screening results with pap/HPV results, lung cancer screening CT results with Lung-Rads classification, etc.) that can be integrated into VA's EHR and Summit Data Platform

AI Tech Sprint Award Ceremony 5.21.24

- 152 teams competed in this innovative journey, making it ***one of the most comprehensive tech sprints to date***
- **Ambient Scribing winners:** (1) Nuance, (2) Abridge, (3) Knowtex
- **CCD winners:** (1) Palantir, (2) Althea Health, (3) Abstractive Health
- Next steps include contract award and pilot implementation

Post Sprint Tech Pilots

Pilot Contract Awards

- Ambient Scribing Contract Award Target is end of July
- CCD Contract Award Target is end of August or Sept.
- An Executive Leadership Team (ELT) representing DHO, OCTO / OCAIO, and VHA DEAN was established as a decision-making body for pilot design

Ambient Scribing Pilot Design

- We plan to pilot the top 2 vendors (Nuance and Abridge) at 5 VAMCs.
- We are targeting 100 users per vendor including Primary Care Physicians and Specialists
- Electronic health record (EHR) integration is in scope

CCD Processing Pilot Design

- Pilot size ands scope will be discussed at an upcoming ELT sessions
- Evaluation criteria development is underway

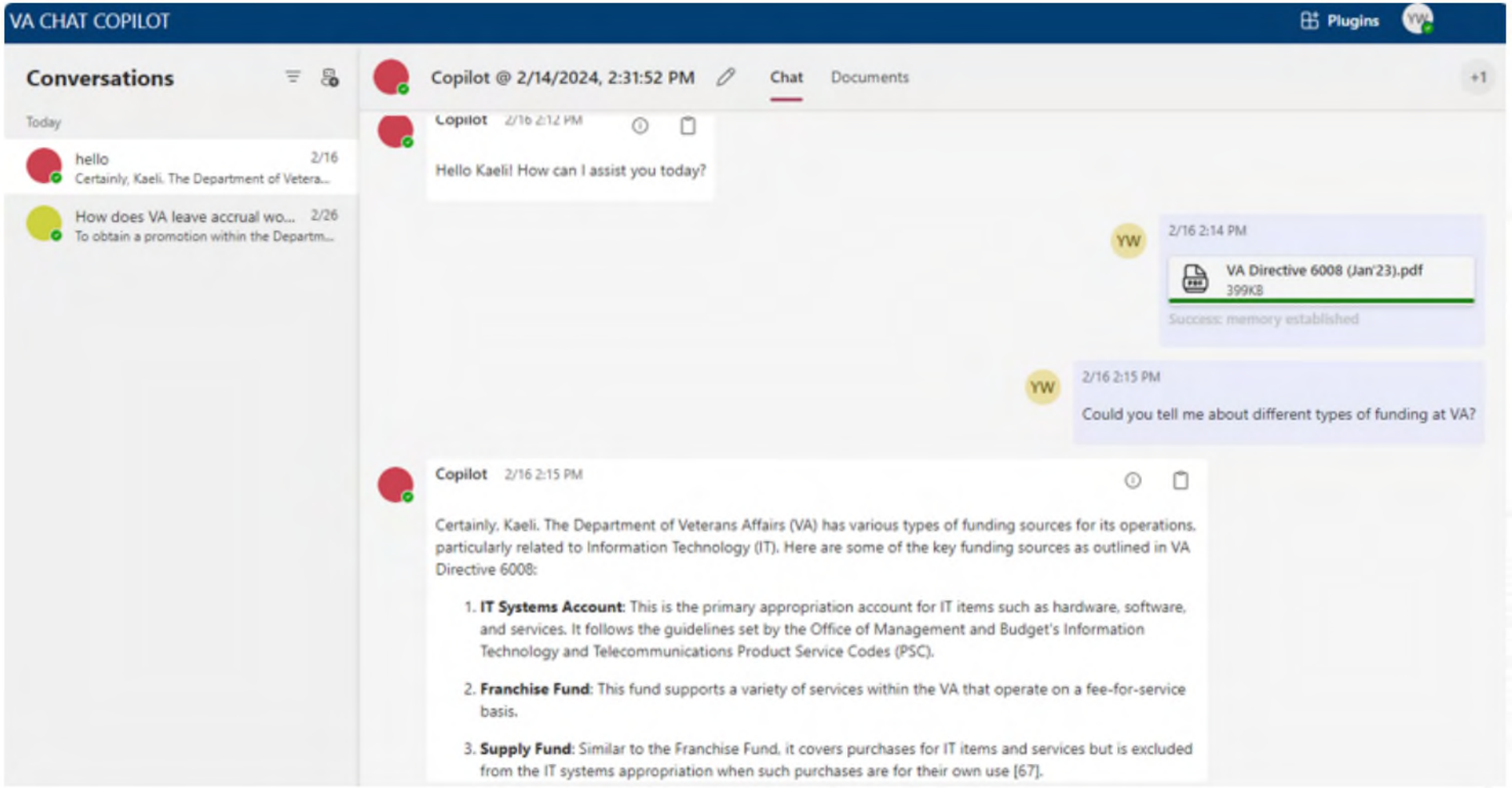
TryOpenAI and Chat Copilot pilots

Generative AI pilots for administrative efficiency

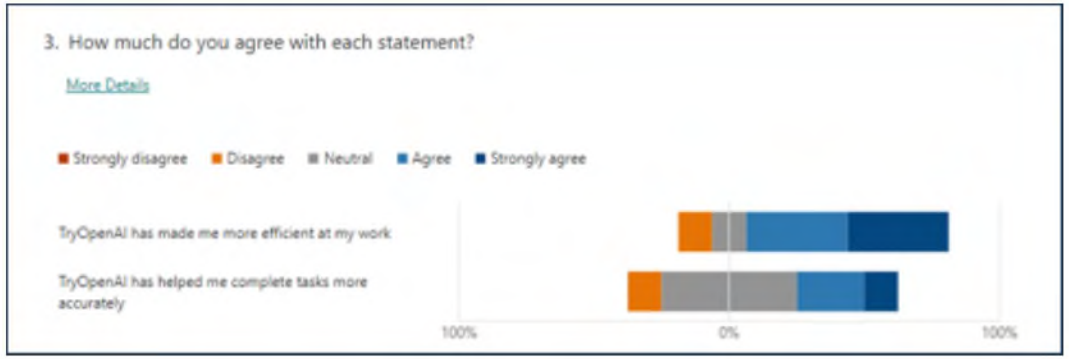
Organizations across industries are experimenting with generative AI applications for Q&A, text summarization, content generation, data analysis, and more. Within VA, there is interest from many groups in using these tools to decrease administrative burdens and increase quality of services provided to Veterans. OCTO is offering several pilots through which VA employees may experiment with these tools.

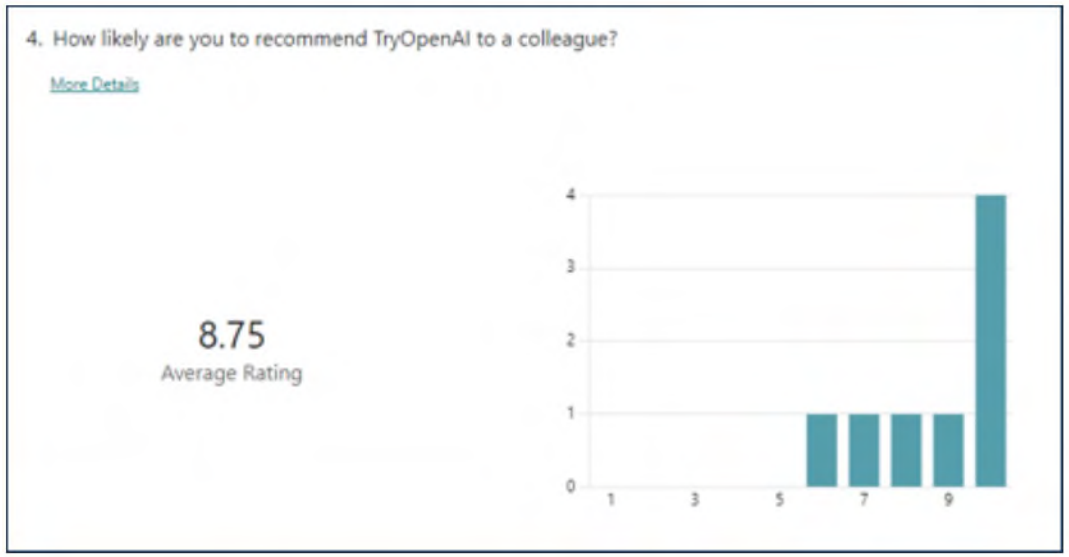
	TryOpenAI	Chat Copilot ("Meta Pilot")
Description	A VA internal generative AI chat interface.	A VA internal generative AI chat interface **that allows upload of documents**.
Pilot goals	• **Understanding strengths and limitations** of genAI tools for reducing administrative burden, increasing employee satisfaction, and increasing quality of services provided to Veterans. • **Obtaining specific proof points/metrics** with respect to impact of Chat Copilot utilization across various VA employee-facing use cases. • **Informing plans for potential enterprise-wide offering** of this type of tool.	
Model	GPT 3.5 Turbo or GPT 4.0	GPT 4.0
Status	• ~20 pilot users live • Early positive anecdotal feedback from team summarizing veteran user research studies for VA teams to consume, and from a team using it to save time drafting emails.	• >35 pilot ideas submitted via intake form from across VA • 2 pilots kicked off in May: (1) Assisting HR staff with applying Military Spouse policies, and (2) Drafting content for ORD Communications team. • Metrics collection underway.

Chat Copilot



Early TryOpenAI results





"The introduction of AI is a game changer...

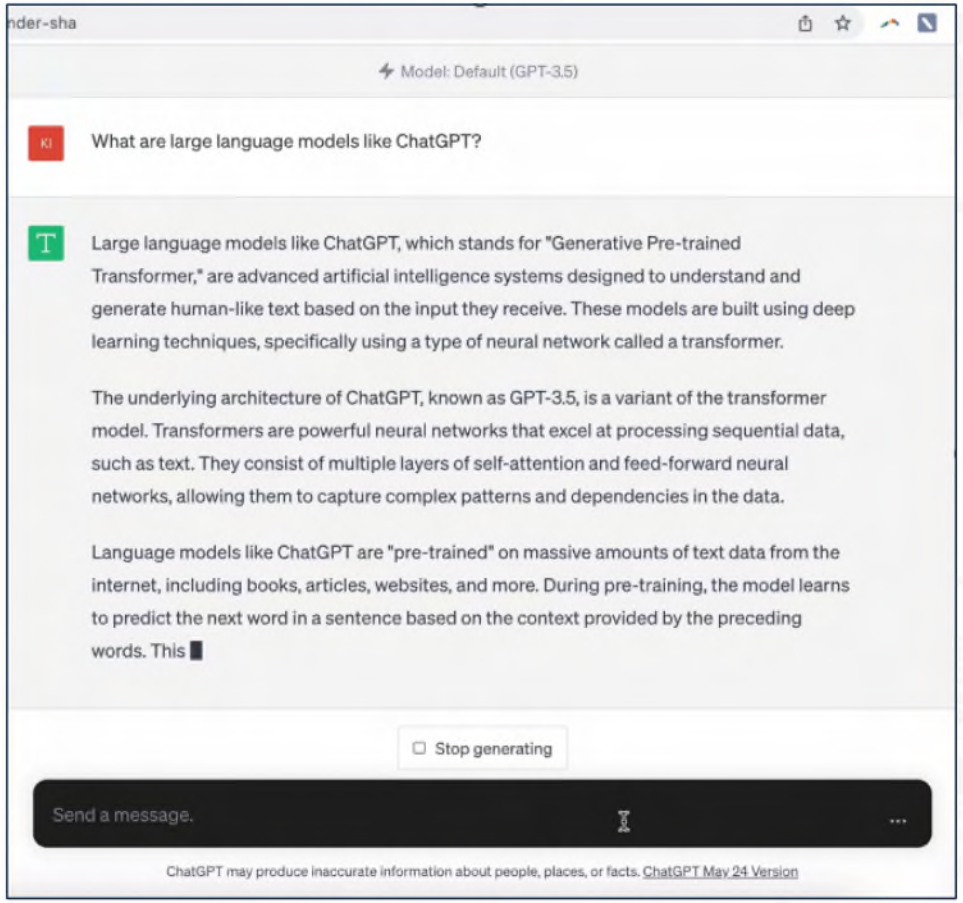
With the AI's assistance, we have been able to draft emails to all staff, create initiatives for our whole health staff, review complex emails requiring high diplomacy, and even generate bullet points effortlessly.

This has freed up valuable time and mental energy, enabling us to direct our efforts towards the core aspects of our work."

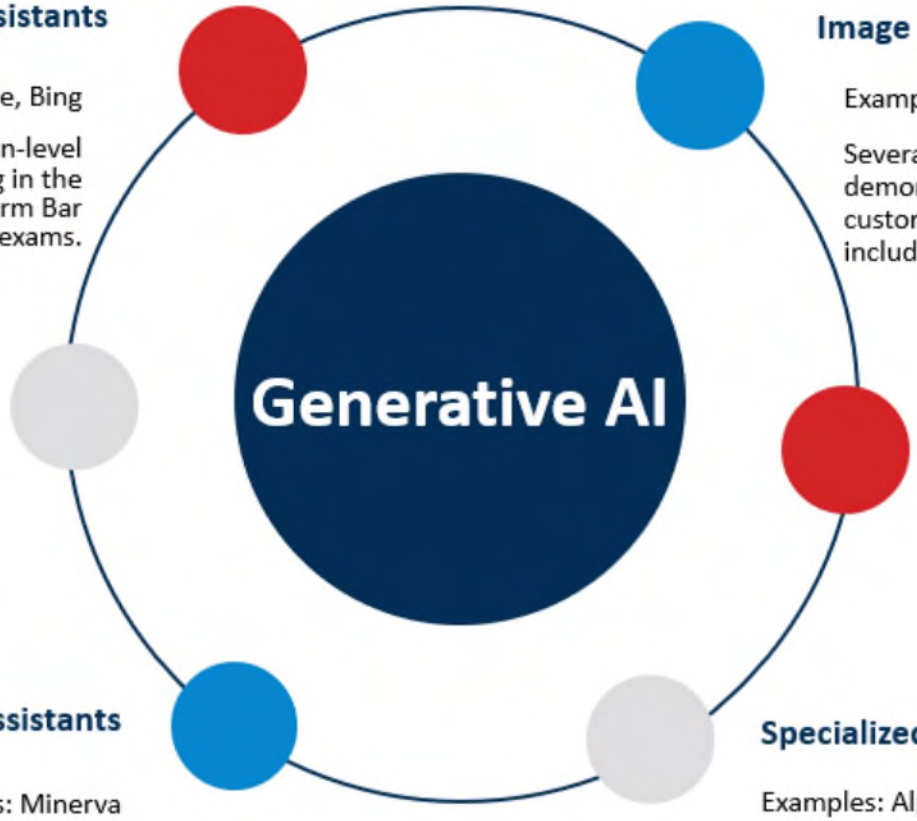
-Monica Diaz, Senior Executive Director, Homeless Programs Office (HPO), VHA

Generative AI & Large Language Models (LLMs)

- Interest in large language models increased dramatically with the release of Chat Generative Pre-trained Transformer (ChatGPT) in November 2022
- LLMs are deep learning algorithms that have been trained on massive datasets and can recognize, summarize, translate, predict and generate content



Example Applications of Large Language Models



Chat assistants

Examples: ChatGPT, Bard, Claude, Bing

Some LLMs have demonstrated human-level performance at certain tasks, such as scoring in the 80th percentile or better on the LSAT, Uniform Bar Exam, and some GRE, SAT, and AP exams.

Image generators

Examples: Midjourney, DALL-E

Several image generators have demonstrated the ability to rapidly create custom images in a wide variety of styles, including photorealism.

Coding assistants

Examples: CoPilot, CodeGPT

Models trained on programming examples can generate usable code. Some have even passed mock technical interviews.

Speech synthesizers & translators

Examples: ElevenLabs, Whisper

Models trained on speech audio data can synthesize audio in the voice of a chosen individual. Similar models have also demonstrated proficiency at translating and transcribing speech to text.

Educational assistants

Examples: Minerva

Some models have been adapted for educational use (i.e., virtual tutors).

Specialized functions

Examples: AlphaFold

Specialized models can perform difficult tasks such as protein structure prediction.

Image created with the National Artificial Intelligence Institute (NAII) at VA

Risks of Generative AI and LLMs (1 of 2)

- **Misinformation:** Prone to providing realistic, but inaccurate, information

'I want to destroy whatever I want': Bing's AI chatbot unsettles US reporter

NYT correspondent's conversation with Microsoft's search engine leads to bizarre philosophical conversations that highlight the sense of speaking to a human

National Eating Disorders Association takes its AI chatbot offline after complaints of 'harmful' advice

By Catherine Thorbecke, CNN
Updated 1:08 PM EDT, Thu June 1, 2023

NEW YORK · **Published** June 9, 2023 12:34pm EDT

Lawyers who used ChatGPT included fake legal research fabricated by AI chatbot

A Manhattan federal judge, disturbed and angered by the case, may sanction the lawyers

Risks of Generative AI and LLMs (2 of 2)

- **Misinformation:** Output from LLM tools, like ChatGPT, may contain errors or fabricated information
- **Bias and discrimination:** The manner of training LLMs introduces and amplifies biases in the training data
- **Threats to data privacy and security:** Control and provenance of data and queries are lost once submitted to public generative AI services
- **Abuse and fraud:** Guardrails and safeguards in common generative AI tools can be bypassed

Join the AI Community

- **AI@VA Community** - open to all who are interested in AI at VA
- **VA AI@VA Intranet Hub** - open to VA staff interested in AI
- **Interagency Health AI Community** - professional interest group for those engaged in health and medicine and AI - **open to .gov and .mil email addresses**
- **AI Network** - AI researchers and practitioners across VA Medical Centers - **open to .gov and .mil email addresses**
- VA also has active **AI Communities of Practice**, which also include AI events and training sessions, as well as other employee resources:
  - Current Guidance for Generative AI Models at VA | Office of Information and Technology
  - VA Office of the Chief AI Officer | Office of Information and Technology
  - FAQs, including "What AI Products are available for use at VA?"
  - National Artificial Intelligence Institute (NAII) (va.gov)
  - VA Artificial Intelligence

From: Worthington, Charles
Sent: Tue, 8 Apr 2025 12:57:21 +0000
To: (b)(6)
Cc: Jones, Luwanda F. (OIT)
Subject: Re: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Co-pilot would be my recommendation as well to experiment with. What did (b)(6) say?

Get Outlook for iOS
From: (b)(6)@va.gov>
Sent: Tuesday, April 8, 2025 8:22:26 AM
To: Worthington, Charles <(b)(6)@va.gov>
Cc: Jones, Luwanda F. (OIT) (b)(6)va.gov>
Subject: FW: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Hi Charles,

(b)(6) from OEI reached out about (b)(5)
(b)(5)
(b)(5). Would it be worth it to connect (b)(6) with you? You and your team might have more ideas about how (if) OEI can use AI to help with that effort than what (b)(6) or I are able to offer.

V/R
(b)(6)
Compliance, Risk, and Remediation
Office of Information and Technology
Department of Veterans Affairs
(202) 815-(b)(6)

PRE-DECISIONAL

From: (b)(6)va.gov>
Sent: Tuesday, April 8, 2025 7:29 AM
To: (b)(6) (OIT | CCS | CS) (b)(6)va.gov>; (b)(6)@va.gov>; (b)(6)va.gov>
Cc: (b)(6)@va.gov>; (b)(6)va.gov>
Subject: Re: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

(b)(5)

Get Outlook for iOS

From: (b)(6) (OIT | CCS | CS) <(b)(6) @va.gov>
Sent: Monday, April 7, 2025 11:13:38 PM
To: (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6)
(b)(6) va.gov>
Cc: (b)(6) @va.gov>; (b)(6) va.gov>
Subject: RE: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Hi all,

(b)(5)

(b)(6)
Acting Deputy Exec. Director, CCS

Director, Collaboration Services (Contact (b)(6) for any interim M365 needs)
VA Enterprise Collaboration Services (VACS) (005D2E1C1)
Connectivity & Collaboration Services
Office of Information and Technology

Mobile (b)(6)

Did I or a member of my team provide exceptional customer service today? If so, please provide your feedback at "Caught You at Your Best".

From: (b)(6) @va.gov>
Sent: Monday, April 7, 2025 3:23 PM
To: (b)(6) @va.gov>; (b)(6) (OIT | CCS | CS) <(b)(6) @va.gov>;
(b)(6) @va.gov>
Cc: (b)(6) @va.gov>; (b)(6) @va.gov>
Subject: Re: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Right. Agree. (b)(5)

(b)(5)

Get Outlook for iOS

From: (b)(6) @va.gov>
Sent: Monday, April 7, 2025 4:19:20 PM
To: (b)(6) @va.gov>; (b)(6) (OIT | CCS | CS) <(b)(6) @va.gov>;
(b)(6) @va.gov>

Cc: (b)(6) @va.gov>; (b)(6) va.gov>
Subject: RE: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

I'm going to defer to (b)(6) and (b)(6) but my initial thought is that there would have to be some parameters set (e.g., keywords, location, etc.) to automate the identification piece of that data call.
(b)(6) or (b)(6) - handing the mic to you for input.

V/R
(b)(6)
Compliance, Risk, and Remediation
Office of Information and Technology
Department of Veterans Affairs
(202) 815-(b)(6)

PRE-DECISIONAL

From: (b)(6) @va.gov>
Sent: Monday, April 7, 2025 4:10 PM
To: (b)(6) @va.gov>
Cc: (b)(6) @va.gov>; (b)(6) va.gov>; (b)(6)
(b)(6) @va.gov> (b)(6) (OIT | CCS | CS) <(b)(6) va.gov>
Subject: Re: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Yes, that is correct.

Get Outlook for iOS

From: (b)(6) @va.gov>
Sent: Monday, April 7, 2025 4:08:36 PM
To: (b)(6) @va.gov>
Cc: (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6)
(b)(6) @va.gov> (b)(6) (OIT | CCS | CS) (b)(6) @va.gov>
Subject: RE: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Hi (b)(6)

What is the scope of your data call? Is it every sub-regulatory document / content regardless that exists, regardless of topic?

V/R
(b)(6)
Compliance, Risk, and Remediation
Office of Information and Technology
Department of Veterans Affairs
(202) 815-(b)(6)

PRE-DECISIONAL

From: (b)(6) @va.gov>
Sent: Monday, April 7, 2025 3:20 PM
To: (b)(6) @va.gov>; (b)(6) (OIT | CCS | CS) (b)(6) @va.gov>
Cc: (b)(6) va.gov>; (b)(6) @va.gov>
Subject: FW: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Hi (b)(6) and (b)(6)

Good afternoon. I have a question (b)(5)

(b)(5)

Thoughts?

(b)(6)

VA | U.S. Department of Veterans Affairs
Enterprise Integration

(b)(6) **JD, MA, MCC**
Executive Director of Enterprise Policy & Governance

From: Brazell, Karen L. (b)(6) va.gov>
Sent: Monday, April 7, 2025 1:50 PM
To: (b)(6) @va.gov>; (b)(6) a.gov>; (b)(6)

(b)(6) @va.gov>; (b)(6) , VBAVACO (b)(6) @va.gov>; Pape, Lisa M. <(b)(6) @va.gov>; Rosenmerkel, Lisa S. (b)(6) @va.gov>; (b)(6) (VA) (b)(6) @va.gov>; Lambert, Jonathan W. (b)(6) @va.gov>; Morton, Barbara C. <(b)(6) @va.gov>; (b)(6) (VACO) <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; Sanfilippo, Nathan T. <(b)(6) @va.gov>; (b)(6) @va.gov>; Quill, Joshua J. <(b)(6) @va.gov>; (b)(6) @va.gov>; H (b)(6) @va.gov>; Arnold, Kenneth A. <(b)(6) @va.gov>; Williams, Bennie (OAWP) <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>

Cc: (b)(6) @va.gov>; (b)(6) @va.gov>; Mcleod-poole, Kenyatta Y. (OGC) <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) (OIT SMO) <(b)(6) @va.gov>; (b)(6) (OIT | CCS | CS) <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) (OGC) <(b)(6) @va.gov>; (b)(6) (OGC) <(b)(6) @va.gov>; Love Holmon, Shana Y. <(b)(6) @va.gov>; (b)(6) (OGC) <(b)(6) @va.gov>; (b)(6) @va.gov>; Bartrum, John J. <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>

Subject: RE: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Good afternoon – please complete the action below before our meeting on Wednesday, 4/9/25.

Best regards,

Karen L. Brazell, PMP
Senior Advisor to the Secretary
Department of Veterans Affairs

From (b)(6) @va.gov>
Sent: Wednesday, April 2, 2025 5:29 PM
To: (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) VBAVACO (b)(6) @va.gov>; Pape, Lisa M. <(b)(6) @va.gov>; Rosenmerkel, Lisa S. <(b)(6) @va.gov>; (b)(6) (VA) <(b)(6) @va.gov>; Lambert, Jonathan W. <(b)(6) @va.gov>; Morton, Barbara C. <(b)(6) @va.gov>; (b)(6) (VACO) <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; Brazell, Karen L. <(b)(6) @va.gov>; Sanfilippo, Nathan T. <(b)(6) @va.gov>; (b)(6) @va.gov>; Quill, Joshua J. <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; Arnold, Kenneth A. <(b)(6) @va.gov>; Williams, Bennie (OAWP) <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>

Cc: (b)(6) @va.gov>; (b)(6) @va.gov>; Mcleod-poole, Kenyatta Y. (OGC) <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) . (OIT SMO) <(b)(6) @va.gov>; (b)(6) (b)(6) . (OIT | CCS | CS) <(b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) @va.gov>; (b)(6) (OGC) <(b)(6) @va.gov>; (b)(6) (OGC) <(b)(6) @va.gov>; Love Holmon, Shana

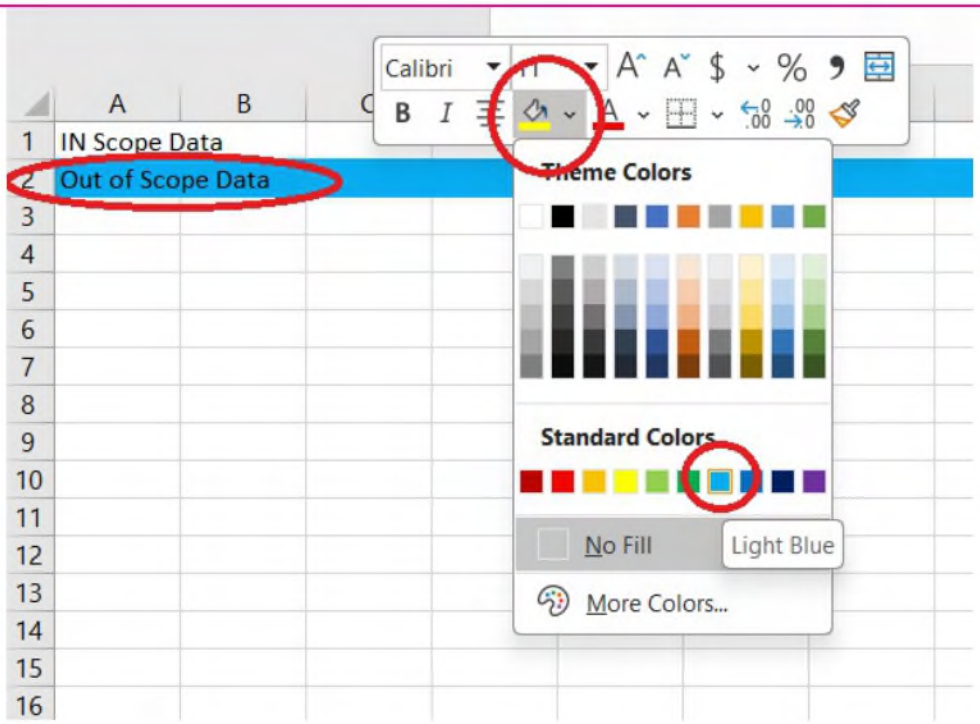
Y. [redacted]@va.gov>; [redacted] (OGC) [redacted]@va.gov>; [redacted]
[redacted]@va.gov>; Bartrum, John J. [redacted]va.gov>; [redacted]
[redacted]@va.gov>; [redacted]@va.gov>

Subject: Forms, Publications, Guidance, and Document (FPGD) Action Team - Meeting Due Outs

Good afternoon,

Before next week's meeting:

(b)(5)



If you have any question, please let me know.

Thank you,

(b)(6)
Executive Director

ENTERPRISE
PROGRAM
INTEGRATION
OFFICE

Mobile: 240-520(b)(6)

From: Worthington, Charles
Sent: Thu, 10 Apr 2025 19:48:42 +0000
To: Brazell, Karen L.
Cc: Jones, Luwanda F. (OIT); Lavingia, Sahil; McManus, Kimberly F.
Subject: [Seeking your concurrence on AI message to agency AI leaders]
Attachments: M-25-21 Accelerating Federal Use of AI through Innovation Governance and Public Trust.pdf, M-25-22-Driving-Efficient-Acquisition-of-Artificial-Intelligence-in-Government.pdf

Hi Karen - OMB has released its new AI policy document, and I would like to share the below update with the agency's AI leaders (members of the VA AI Governance Council).

I am seeking your concurrence, following the previous instruction to run all (b)(5)

(b)(5)

The new memos are helpful for us - they streamlines VA's requirements quite a bit and I love its

(b)(5)

Charles

====

Subject: Release of OMB Guidance for Federal AI Use and Acquisition

PRE-DECISIONAL

Greetings AI Governance Council Members,

(b)(5)

Strategic Approach

- (b)(5)

Key Priorities / Directives

- (b)(5)
- Continuous monitoring and human review of AI applications to ensure ongoing compliance and performance.

(b)(5)

I look forward to working with you all on this strategically important technology.

Charles Worthington
Chief Technology Officer & Chief Artificial Intelligence Officer
U.S. Department of Veterans Affairs
(b)(6) @va.gov | m: 202-430-(b)(6)

PRE-DECISIONAL

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

THE DIRECTOR

April 3, 2025

M-25-21

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Russell T. Vought
Director

SUBJECT: Accelerating Federal Use of AI through Innovation, Governance, and Public Trust

OVERVIEW

On January 23, 2025, President Trump signed Executive Order (E.O.) 14179, *Removing Barriers to American Leadership in Artificial Intelligence*, to advance the United States' global AI dominance and to promote responsible AI innovation. Now more than ever, agencies[1] are empowered to drive AI innovation and seize the opportunity to apply the best of American AI. Through this memorandum, agencies are directed to provide improved services to the public, while maintaining strong safeguards for civil rights, civil liberties, and privacy. This memorandum provides guidance to agencies on ways to promote human flourishing, economic competitiveness and national security. Agencies must follow the detailed implementation instructions and requirements included in the Appendix. This memorandum rescinds and replaces Office of Management and Budget (OMB) Memorandum M-24-10, *Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence*.

SCOPE

This memorandum is directed to the heads of all Executive Branch departments and agencies, including independent regulatory agencies.[2]

GUIDANCE ON FEDERAL USE OF AI

The United States is at the forefront of AI development, and agencies must adopt a forward-leaning and pro-innovation approach that takes advantage of this technology to help shape the future of government operations. Agencies are encouraged to harness solutions that bring the best value to taxpayers, increase quality of public services, and enhance government efficiency. Through this memorandum, agencies will be charged to lessen the burden of bureaucratic restrictions and to build effective policies and processes for the timely deployment

[1] The term "agency" has the meaning provided in 44 U.S.C. § 3502(1).
[2] The term "independent regulatory agency" is defined in 44 U.S.C. § 3502(5).

of AI. Agencies are directed to accelerate the Federal use of AI by focusing on three key priorities: innovation, governance, and public trust.[3] Consistent with these goals, agencies must undertake the requirements described in the Appendix. This includes the following:

Agencies must remove barriers to innovation and provide the best value for the taxpayer.

Agencies must lean forward on adopting effective, mission-enabling AI to benefit the American people. To best achieve this, agencies must remove unnecessary and bureaucratic requirements that inhibit innovation and responsible adoption. Agencies must develop public AI strategies that elevate AI adoption and innovation as a priority, while increasing transparency to the American public, civil society, and industry.

Agencies must maximize the value of existing investments to ensure speedy deployment and to protect taxpayer dollars from duplicative spending, including sharing resources within an agency and across government. Agencies must also reuse resources that enable AI adoption, such as agency data, models, code, and assessments of AI performance. When choosing to pursue an AI acquisition, agencies should invest in the American AI marketplace and maximize the use of AI products and services that are developed and produced in the United States. To lead these innovation priorities, agencies are encouraged to develop and retain AI and AI-enabling talent who have the technical experience to scale and govern AI to improve mission outcomes.

Agencies must empower AI leaders to accelerate responsible AI adoption.

Agencies must cut down on bureaucratic bottlenecks and redefine AI governance as an enabler of effective and safe innovation. As a step towards accelerating responsible adoption, agencies must establish clear expectations for their workforce on appropriate AI use—particularly when an agency is using AI to support consequential decision-making. Agency policies must enable agency heads to delegate responsibilities and accountability for risk acceptance to appropriate officials throughout the agency, ensuring that swift action is possible with sufficient guardrails in place.

Agencies must identify a Chief AI Officer to champion their agency's AI goals by advising on how to make these improvements, and agencies must allocate appropriate resources and responsibilities to effect the changes in this memorandum. To support these efforts, OMB will convene and chair an interagency council to maximize agency efficiencies by coordinating the development and use of AI in their programs and operations. Agencies must also be accountable to the taxpayer and must continue with all relevant reporting requirements, including updating their annual AI use case inventory, compliance plans, and reporting as requested by OMB.

Agencies must ensure their use of AI works for the American people.

Every day, the Federal Government takes action and makes decisions that have consequential impacts on the public. If AI is used to perform such action, agencies must deploy

[3] The requirements in this section are consistent with the following laws and policies: AI in Government Act of 2020, Advancing American AI Act, E.O. 13960, and E.O. 14179.

trustworthy AI, ensuring that rapid AI innovation is not achieved at the expense of the American people or any violations of their trust.

As such, agencies are directed to implement minimum risk management practices for AI that could have significant impacts when deployed ("high-impact AI"), as outlined in the Appendix, and to prioritize the use of AI that is safe, secure, and resilient. When the high-impact AI is not performing at an appropriate level, agencies must have a plan to discontinue its use until actions are taken to achieve compliance with this memorandum. If proper risk mitigation is not possible, agencies must cease the use of the AI. In an effort to reduce redundancy and unnecessary burden, agencies are reminded that risk management practices for AI should be proportionate to the anticipated risk from its intended use. These protections will ensure that agencies are serving the American public.

Appendix: M-25-21 Implementation Guidance for Agencies

1. SCOPE

This memorandum provides guidance to agencies on how to innovate and promote the responsible adoption, use, and continued development of AI, while ensuring appropriate safeguards are in place to protect privacy, civil rights, and civil liberties, and to mitigate any unlawful discrimination, consistent with the AI in Government Act.[4] This memorandum does not address general issues related to Federal information and information systems. This memorandum does not supersede, and should be considered in concert with, other more general Federal policies.

Agencies must continue to comply with applicable law and OMB policies in other domains relevant to AI, and must continue to coordinate compliance across the agency with all appropriate officials. All agency officials retain their existing authorities and responsibilities established in other laws and policies.

a. Covered Agencies. Except as specifically noted, this memorandum applies to all agencies defined in 44 U.S.C. § 3502(1).[5] As noted in the relevant sections, some requirements in this memorandum apply only to Chief Financial Officers Act (CFO Act) agencies as identified in 31 U.S.C. § 901(b), and other requirements do not apply to elements of the Intelligence Community, as defined in 50 U.S.C. § 3003.

b. Covered AI. This memorandum provides requirements and recommendations that apply to new and existing AI that is developed, used, or acquired by or on behalf of covered agencies. This memorandum does not, by contrast, govern agencies':

---

[4] Consistent with provisions of the AI in Government Act of 2020, which required the issuance of this memorandum, and the Advancing American AI Act, this memorandum sets forth multiple independent requirements and recommendations for agencies, and OMB intends that these requirements and recommendations be treated as severable. For example, the memorandum's provisions regarding the integrating of AI governance in Section 3 are capable of operating independently, and serve an independent purpose, from the required risk management practices set forth in Section 4. Likewise, each of Section 4's individual risk management practices serve an independent purpose and can function independently from the other risk management practices. Accordingly, while this memorandum governs only agencies' own use of AI and does not create rights or obligations for the public, in the event that a court were to stay or enjoin application of a particular provision of this memorandum, or its application to a particular factual circumstance, OMB would intend that the remainder of the memorandum remain operative.

[5] The term "agency," as used in both the AI in Government Act of 2020 and the Advancing American AI Act, is defined as "any executive department, military department, Government corporation, Government controlled corporation, or other establishment in the executive branch of the Government (including the Executive Office of the President), or any independent regulatory agency," but does not include the Government Accountability Office; the Federal Election Commission; the governments of the District of Columbia and of the territories and possessions of the United States, and their various subdivisions; or Government-owned contractor-operated facilities, including laboratories engaged in national defense research and production activities. 44 U.S.C. § 3502(1); see AI in Government Act of 2020 § 102(2) (defining "agency" by reference to § 3502); Advancing American AI Act § 7223(1) (same). As a result, independent regulatory agencies as defined in 44 U.S.C. § 3502(5), which were not included in the definitions of "agency" in Executive Order 13960, are covered by this memorandum.

i. regulatory actions designed to prescribe law or policy regarding non-agency uses of AI; [6]
ii. assessments of particular AI applications because the AI provider is the target or potential target of a regulatory enforcement, law enforcement, or national security action;[7]
iii. development of metrics, methods, and standards to test and measure AI, where such metrics, methods, and standards result in use by the general public or the government as a whole; or
iv. use of AI to carry out basic research or applied research, except where the purpose of such research is to develop particular AI applications for agency use.

The requirements and recommendations of this memorandum apply to system functionality that implements or is reliant on AI, rather than to the entirety of an information system that incorporates AI. As noted in the relevant sections, some requirements in this memorandum apply only in specific circumstances in which agencies use AI that is deemed high-impact.

c. Applicability to National Security Systems. This memorandum does not cover AI when it is being used as a component of a National Security System.[8]

2. DRIVING AI INNOVATION

The Federal Government has demonstrated that AI can improve public services, increase mission effectiveness, and reduce costs to the American people. Agencies have a responsibility to identify and remove barriers to further responsible AI adoption and application, where practicable, while providing meaningful public transparency into the Federal Government's use of AI. Agencies should focus on improving mission effectiveness through the use of AI by building upon their existing capabilities to drive responsible AI innovation, strengthen their AI and AI-enabling talent, and improve their ability to develop and procure AI.

a. Developing Agency AI Strategies

Within 180 days of the issuance of this memorandum, each CFO Act agency must develop an AI Strategy for identifying and removing barriers to their responsible use of AI and for achieving enterprise-wide improvements in the maturity of their applications. Agencies must use the AI Strategies template, to be provided by OMB, and make their AI Strategies publicly

---

[6] For guidance on regulatory and non-regulatory approaches to AI applications developed and deployed outside of the Federal government and best practices to reduce barriers to the development and adoption of AI technologies, agencies should consult OMB Memorandum M-21-06, *Guidance for Regulation of Artificial Intelligence Applications* (Nov. 17, 2020), https://trumpwhitehouse.archives.gov/wp-content/uploads/2020/11/M-21-06.pdf.

[7] AI is not in scope when it is the target or potential target of such an action, but it is in scope when the AI is used to carry out an enforcement action. For example, when evaluating an AI tool to determine whether it violates the law, the AI would not be in scope; if an agency was using that same AI tool to assess a different target, then the AI would be in scope.

[8] AI innovation and risk for National Security Systems must be managed appropriately, but these systems are governed through other policy. Agencies should reference existing guidelines in place, such as the Department of Defense's (DoD) *Responsible Artificial Intelligence Strategy and Implementation Pathway* and the Office of the Director of National Intelligence's *Principles of Artificial Intelligence Ethics for the Intelligence Community*, as well as policies governing specific high-risk national security applications of AI, such as DoD Directive 3000.09, *Autonomy in Weapon Systems,* https://ogc.osd.mil/Portals/99/autonomy_in_weapon_systems_dodd_3000_09.pdf.

available on the agency's website. To ensure accountability to the taxpayer, strategies should be understandable, accessible to the public, and transparent about how their investments in AI innovation benefit the American people.

Agencies should assess their AI maturity goals and accelerate and scale AI adoption, by appropriately resourcing areas such as data governance, information technology (IT), infrastructure, quality data assets, integration and interoperability, accessibility, privacy, confidentiality, and security. Agencies must strive to utilize and scale existing tools, processes, and resources for AI governance whenever possible to avoid the creation of additional bureaucracy, and invest in technical solutions to make compliance more efficient. Agency AI Strategies must be consistent with this memorandum and include:

i. current and planned AI use cases that are most impactful to an agency's mission, operations, or service delivery;[9]

ii. an assessment of the agency's current state of AI maturity and a plan to achieve the agency's AI maturity goals, by addressing, at a minimum, plans or processes to:

   A. develop AI-enabling infrastructure[10] across the AI lifecycle including development, testing, deployment, continuous monitoring;[11]
   B. ensure access to quality data[12] for AI and data traceability;[13]
   C. develop enterprise capacity for AI innovation;
   D. provide AI tools and capacity to support the agency's AI research and development (R&D) efforts;
   E. develop the necessary operations, governance, and infrastructure to manage risks from the use of AI, including risks related to information security and privacy;
   F. recruit, hire, train, retain, and empower an AI-ready workforce and achieve AI literacy for non-practitioners involved in AI; and
   G. identify, track, and facilitate future AI investment or procurement.

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[9] Consistent with sections 7225(d) and 7228 of the Advancing American AI Act, this requirement applies to CFO Act agencies except for the Department of Defense, and does not apply to elements of the Intelligence Community, as defined in 50 U.S.C. § 3003(4). Information that would be protected from release if requested under 5 U.S.C. § 552 need not be included in the strategy.

[10] Agencies should ensure that their AI projects have access to adequate IT infrastructure, including high-performance computing infrastructure specialized for AI training and inference, where necessary. Agencies should also ensure adequate access for AI developers to the software tools, open-source libraries, and deployment and monitoring capabilities necessary to rapidly develop, test, and maintain AI applications.

[11] Agencies should update, as necessary, processes for information system authorization and continuous monitoring to better address the needs of AI applications.

[12] Agencies should develop adequate infrastructure and capacity to sufficiently share, curate, and govern agency data for use in training, testing, and operating AI. This includes an agency's capacity to maximize appropriate access to and sharing of both internally held data and agency data managed by third parties. Agencies should also explore the possible utility of and legal authorities supporting the use of publicly available information, and encourage its use where appropriate and consistent with the data practices outlined in this memorandum.

[13] In this context, traceability refers to an agency's ability to track and internally audit datasets used for AI, and where relevant, key metadata. A significant enabler of traceability is clear documentation that is meaningful or understandable to individual users and reflects the process for model-driven development.

b. Sharing of Agency Data and AI Assets

Agencies can save taxpayer dollars by actively engaging in quality data governance and management and the reuse of data and AI assets. Chief AI Officers (CAIOs), as described in Section 3(a)(i), and Chief Data Officers (CDOs) are encouraged to coordinate internally and across the Federal Government on criteria for data interoperability and standardization of data formats as a means of increased AI adoption. Agencies should identify and share commonly used packages or functions that have the greatest potential for reuse by other agencies or by the public.

i. Encouraging Reuse of AI Code and Models. Agencies must proactively share across the Federal Government their custom-developed code—including models and model weights—whether agency developed or procured, for AI applications in active use, except in the circumstances described in paragraphs A through D below. Agencies must also prioritize sharing AI code, models, and data government-wide, consistent with the Open, Public, Electronic and Necessary (OPEN) Government Data Act.[14] Agencies, where practicable, must also release and maintain AI code as open source software in a public repository[15] unless the:

   A. sharing of the code is restricted by law or regulation, including patent or intellectual property law, the Export Asset Regulations, the International Traffic in Arms Regulations, or Federal laws and regulations governing classified information;
   B. sharing of the code would create an identifiable risk to national security, confidentiality of Government information, individual privacy, or the rights or safety of the public;
   C. agency is prevented from doing so by a contractual obligation; or
   D. sharing of the code would create an identifiable risk to agency mission, programs, or operations, or to the stability, security, or integrity of an agency's systems or personnel.

ii. Sharing and Releasing AI Data Assets. Data used to develop and test AI may constitute a "data asset" within the meaning of 44 U.S.C. § 3502(17). Agencies must include them in their comprehensive data inventories if required by the OPEN Government Data Act and OMB Memorandum M-25-05, *Phase 2 Implementation of the Foundations for Evidence-*

[14] Title II of the Foundations for Evidence-Based Policymaking Act of 2018, Pub. L. No. 115-435, https://www.congress.gov/115/statute/STATUTE-132/STATUTE-132-Pg5529.pdf.

[15] For guidance and best practices related to sharing code and releasing it as open source, agencies should consult OMB Memorandum M-16-21, *Federal Source Code Policy: Achieving Efficiency, Transparency, and Innovation through Reusable and Open Source Software* (Aug. 8, 2016), https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2016/m_16_21.pdf. Agencies are additionally encouraged to draw upon existing collaboration methods to facilitate the sharing and release of code and models, the General Services Administration's AI Community of Practice, and https://www.code.gov, as well as other publicly available code repositories.

Based Policymaking Act of 2018: Open Government Data Access and Management Guidance.[16]

iii. Unintended Disclosure of Data from AI Models. Consistent with Section 2(d)(i), agencies should assess the risks associated with AI models, as they may reveal sensitive details of the data used to develop them.[17]

c. Leveraging American AI and Innovation

Executive Order 14179 recognizes the importance of American AI development to promote human flourishing, economic competitiveness, and national security. Consistent with applicable law, it is the policy of the United States to buy American and to maximize the use of AI products and services that are developed and produced in the United States. OMB Memorandum M-25-22, *Driving Efficient Acquisition of Artificial Intelligence in Government,* covers the importance of American AI in federal procurement.

d. Effective Federal Procurement of AI

This section provides agencies with recommendations for the responsible procurement of AI capabilities to facilitate compliance with the minimum risk management practices for high-impact AI use cases detailed in Section 4. Consistent with Section 7224(d) of the Advancing American AI Act and Executive Order 14179, OMB will issue revised guidance to ensure that Federal contracts for the acquisition of an AI product or service align with the recommendations of this memorandum.

i. Maximizing the Value of Data for AI. In contracts for AI products and services, agencies should treat relevant data, or improvements to that data—such as cleaning and labeling—as a critical asset for their AI maturity. Agencies should take steps to ensure that their contracts retain sufficient rights to Federal Government data and retain any improvements to that data, including the continued design, development, testing, and operation of AI. Additionally, agencies should consider contractual terms that prevent vendor lock-in and also protect Federal information used by vendors in the development and operation of AI products and services for the Federal Government. Contract terms should protect such data from unauthorized disclosure or use, and from being used to train or improve the functionality of the vendor's commercial offerings without express permission from the agency.

ii. Performance Improvement. Agencies, where practicable, are encouraged to better track and evaluate performance of their procured AI by:

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[16] Where such data is already publicly available, agencies are not required to duplicate it, but should maintain and share the provenance of such data and how others can access it. For guidance on the sharing and release of data assets, see OMB Memorandum M-25-05, *Phase 2 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Open Government Data Access and Management Guidance* (Jan. 15, 2025), https://www.whitehouse.gov/wp-content/uploads/2025/01/M-25-05-Phase-2-Implementation-of-the-Foundations-for-Evidence-Based-Policymaking-Act-of-2018-Open-Government-Data-Access-and-Management-Guidance.pdf.

[17] The risks of unintended disclosure differ by model, and agencies should also not assume that an AI model poses the same privacy and confidentiality risks as the data used to develop it.

A. documenting known capabilities and limitations of the AI and any guidelines on how the system is intended to be used;
B. documenting provenance of the data used to train, fine-tune, or operate the AI;
C. conducting ongoing testing and validation on AI model performance; the effectiveness of vendor AI offerings; and associated risk management measures, including by testing in real-world conditions;
D. assessing for overfitting to known test data, ensuring that AI developers or vendors are not directly relying on the test data to train their AI systems;[18]
E. considering contractual terms that prioritize the continuous improvement, performance monitoring, and evaluation of effectiveness of procured AI; and
F. requiring sufficient post-award monitoring and evaluation of effectiveness of the AI, where appropriate in the context of the product or service acquired.

iii. Promoting Competition in Federal Procurement of AI. Agencies should adopt procurement practices that encourage competition to sustain a robust Federal AI marketplace, such as by preferencing interoperable AI products and services.

e. Enabling an AI-Ready Federal Workforce

Training the Federal workforce about AI improves efficiency and increases AI adoption. The Federal workforce has a responsibility to develop and maintain, at a minimum, foundational knowledge of how to use AI responsibly in performing their official duties. Agencies are strongly encouraged to prioritize recruiting, developing, and retaining technical talent in AI roles. The benefits include increasing enterprise capacity for responsible AI innovation, providing the Federal workforce pathways to AI up-skilling, and assisting employees in applying AI to their work. Agencies should take action by:

i. Leveraging AI Trainings and Resources to Upskill Existing Staff. Agencies should leverage AI training programs and resources, such as the annual training made available government-wide by OMB and GSA,[19] to strengthen the technical skills of staff in AI and AI-enabling roles. Agencies should develop additional technical training or resources as needed to increase practical, hands-on expertise with AI technologies.

ii. Promoting AI Talent. Agencies should focus recruitment efforts on individuals that have demonstrated operational experience in designing, deploying, and scaling AI systems in high-impact environments.

iii. Ensuring Accountability. Agencies, in coordination with relevant agency officials, should identify and track, as appropriate, existing and emerging needs related to AI talent and expertise across the agency to ensure technical talent and resources are allocated properly and aligned with mission needs.

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[18] For instance, using validation data to train a model could lead the model to learn spurious correlations that make the model appear accurate in tests but degrade the real-world performance of the AI system.
[19] *See* the AI Training Act, Pub. L. No. 117-207, https://www.congress.gov/117/plaws/publ207/PLAW-117publ207.pdf.

3. IMPROVING AI GOVERNANCE

Effective AI governance is key to accelerated innovation as it empowers professionals at all levels to align processes, establish clear policies, and foster accountability while reducing unnecessary barriers to AI adoption. To that end, agencies must identify key officials to lead agency AI adoption and promote the sharing of best practices, empowering the entire Federal workforce to leverage AI in fulfilling their mission. Consistent with these goals, agencies must undertake the following:

a. Agency Governance Roles and Bodies

Consistent with agency policies, the Federal workforce is encouraged to embrace AI adoption at all levels of the Federal Government and to use AI for innovation and increased efficiency. To support this adoption and use, senior agency leaders must effectively distribute responsibilities and accountability, collaborating with agency officials in AI and AI-enabling roles. In support of these objectives and consistent with Executive Order 13960 and Executive Order 14179, agency heads are responsible for establishing the following:

i. Chief AI Officers. Within 60 days of the issuance of this memorandum, the head of each agency must retain or designate a Chief AI Officer (CAIO). CAIOs will promote AI innovation, adoption, and governance, in coordination with appropriate agency officials. Agency heads may choose to designate an existing official, such as a Chief Information Officer, Chief Data Officer, Chief Technology Officer, or similar official with relevant or complementary authorities and responsibilities, provided that individual has significant expertise in AI.

For CFO Act agencies, the CAIO must hold a position at the Senior Executive Service, Scientific and Professional, or Senior Leader level, or equivalent. For other agencies, the CAIO must be at or above Grade 14 of the General Schedule (GS), or the equivalent for agencies that do not use the GS classification system. CAIOs must have the necessary authority to perform the responsibilities in this section and must be positioned highly enough to engage regularly with other agency leadership, to include the Deputy Secretary or equivalent. Agencies must notify OMB within 30 days when the designated CAIO changes or the position is vacant. CAIOs, in coordination with appropriate agency officials, must:

A. promote agency-wide responsible AI innovation and adoption in accordance with this memorandum through a governance and oversight process;
B. coordinate with other responsible agency officials to ensure that the agency's use of AI complies with applicable law and governmentwide guidance;
C. serve as the senior advisor on AI to the head of the agency and within their agency's executive decision-making forums;
D. represent their agency in and collaborate with coordination bodies related to their agency's AI activities, including external forums such as AI-related councils, standard-setting bodies, relevant governance boards, or international bodies;

E. maintain the agency's AI Use Case Inventory;[20]
F. ensure processes are in place for the agency's high-impact AI use, consistent with Section 4 of this memorandum, by:
    1. establishing a process for determining and documenting AI use cases as high-impact;
    2. establishing processes to measure, monitor, and evaluate the ongoing performance and effectiveness of the agency's high-impact AI applications;
    3. overseeing agency compliance with requirements to manage risks from the use of AI, including those established in this memorandum and in relevant law and policy;
    4. establishing a process for an independent review of high-impact use cases before risk acceptance, consistent with Section 4;
    5. centrally tracking high-impact use cases and use case determinations;
G. advise on the transformation of the agency's workforce into an AI-ready workforce;
H. ensure that custom-developed AI code and the data used to develop and test AI are appropriately inventoried, shared, and released in agency code and data repositories, in coordination with their agency's relevant officials;
I. provide guidance on AI investments to the agency head and agency CFO related to resourcing requirements necessary to implement this memorandum; and
J. support agency efforts to track AI spending.

ii. Agency AI Governance Board. Within 90 days of the issuance of this memorandum, each CFO Act agency must convene its relevant agency officials to coordinate and govern issues related to the use of AI within the Executive Branch. Agencies are permitted to rely on existing governance bodies to fulfill this requirement. Agencies are responsible for ensuring that agency AI governance boards:

A. include a chair, at the Deputy Secretary level or equivalent, and a vice-chair who is the agency CAIO. Working through this Board, CAIOs will support their respective Deputy Secretaries in coordinating agency AI activities;
B. include appropriate representation from key stakeholder offices or components, including those responsible for addressing IT, cybersecurity, data, budget, statistics, legal counsel, privacy, civil rights, and civil liberties. When relevant, AI governance boards must include representatives from the following disciplines: agency management, human capital, procurement, customer experience, program evaluation, and officials responsible for implementing AI within an agency's program office(s); and
C. consult external experts, as needed and appropriate, to broaden the perspective of the designated governance board and to integrate sector-specific expertise, including recommendations on innovative agency AI use cases.

[20] As required by Pub. L. No. 117-263, div. G, title LXXII, subtitle B, § 7225 (codified at 40 U.S.C. 11301 note), https://www.congress.gov/117/plaws/publ263/PLAW-117publ263.pdf.

b. Agency Governance Responsibilities

Agencies must enable responsible AI governance and ensure innovative and appropriate use of AI agency-wide. Agency heads must:

i. Empower Agency AI Leaders. Agencies must enable trained and accountable agency officials at the lowest appropriate level[21] to identify, assess, mitigate, and accept risk for AI use cases.[22]

ii. Develop Compliance Plans. Consistent with Section 104(c) and (d) of the AI in Government Act of 2020, within 180 days of the issuance of this memorandum or any update to this memorandum, and every two years thereafter until 2036, each agency must submit to OMB and post publicly on the agency's website either a plan to achieve consistency with this memorandum, or a written determination that the agency does not use and does not anticipate using covered AI. Agencies must also include plans to update any existing internal AI principles and guidelines to ensure consistency with this memorandum.[23] OMB will provide templates for these compliance plans.

iii. Update Agency Policies. Within 270 days of the issuance of this memorandum, agencies must revisit and update where necessary their internal policies on IT infrastructure (e.g., software tools, use of open source software, libraries, and code for AI development, software deployment and platform modernization), data (e.g., data inventory; making quality data available for use by AI; lawful access to agency data, third-party data, and publicly available data, where appropriate; representativeness), cybersecurity (e.g., information system authorizations, continuous monitoring, continuous authorizations for AI), and privacy to align with this memorandum, Executive Order 14179, Executive Order 13960, and with applicable law. Agency policies should aim to advance using models that are built with less data, require less compute, and are inherently more explainable, where possible.

iv. Develop Generative AI Policy. Within 270 days of the issuance of this memorandum, agencies should develop a policy that sets the terms for acceptable use of generative AI for their missions and establishes adequate safeguards and oversight mechanisms that allow generative AI to be used in the agency without posing undue risk.

v. Update AI Use Case Inventories. Each agency (except for the Department of Defense and the Intelligence Community) must inventory its AI use cases at least annually, submit the inventory to OMB, and post a public version on the agency's website. Agencies are encouraged to update the public versions of their inventories on an ongoing basis to reflect

[21] Agencies are encouraged to assign these responsibilities to agency officials who are accountable for the mission outcome of the AI use case.

[22] The process for reviewing and accepting risk for AI use cases is separate from, and does not supersede, the authorization process for information systems, consistent with OMB Circular No. A-130, Managing Information as a Strategic Resource, https://bidenwhitehouse.archives.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A130/a130revised.pdf.

[23] Given the importance of context-specific guidance on AI, agencies are encouraged to continue implementing their agency's AI principles and guidelines, so long as they do not conflict with this memorandum.

their current use of AI. OMB will issue detailed instructions to agencies regarding the inventory and its scope.

c. Federal Governance Roles and Bodies

Breaking barriers to AI adoption and ensuring the government is maximizing efficiency requires coordination. The primary interagency body to lead this coordination will be the Chief AI Officer Council.

i. Chief AI Officer Council. Within 90 days of the issuance of this memorandum, the Director of OMB, or designated senior official within OMB, shall convene and chair an interagency council to coordinate the development and use of AI in agencies' programs and operations, other than the use of AI in national security systems, and to advance the implementation of the AI Principles established by Section 6 of Executive Order 13960. The Chief AI Officer Council shall:

A. include as members the Chief AI Officers of CFO Act agencies, as well as representatives of the White House Office of Science and Technology Policy, the Office of the Director of National Intelligence, and other agencies as identified by the Chair;
B. coordinate the development and use of AI across agencies' programs and operations, including enabling compliance with implementation of this memorandum and all other applicable authorities;
C. develop and promote shared templates, formats, technical resources, and exemplary uses of agency AI adoption and implementation; and
D. sunset five years after the issuance of this memorandum, unless otherwise authorized by the OMB Director.

4. FOSTERING PUBLIC TRUST IN FEDERAL USE OF AI

Agencies must continue to develop AI that serves the public by, for example, increasing the accessibility of government services, increasing government efficiency, enhancing national security, and growing American economic competitiveness in a way that benefits people across the United States. Agencies must ensure their AI use is trustworthy, secure, and accountable, in accordance with Executive Order 13960. In the pursuit of agency-wide AI adoption and use, the Federal workforce at varying levels will participate in AI or AI-enabling roles, with accountable officials assuming risk.[24] As part of this effort, AI risk management policies must be written to both ensure the minimum number of requirements necessary to enable the trustworthy and responsible use of AI and also ensure those requirements are understandable and implementable.

Agencies are required to implement minimum risk management practices, detailed in Section 4(b) of this memorandum, to manage risks from high-impact AI use cases. However, Sections 4(a) through (b) of this memorandum do not apply to elements of the Intelligence

[24] Agencies are encouraged to assign these responsibilities to agency officials who are accountable for the mission outcome of the AI use case.

Community.[25] Consistent with these goals, agencies must undertake the following, in addition to following OMB standards and requirements governing information dissemination, where applicable.[26]

a. Determining High-Impact AI

This section introduces requirements that are *only* applicable to "high-impact" agency uses of AI. As further defined in Section 5 of this memorandum, AI is considered high-impact when its output serves as a principal basis for decisions or actions that have a legal, material, binding, or significant effect on rights or safety. As part of conducting internal reviews of high-impact use, agencies should evaluate the AI's specific output and its potential risks when assessing the applicability of the high-impact definition.[27] A high-impact determination is possible whether there is or is not human oversight for the decision or action.[28]

Section 6 provides agencies with categories of AI use cases that are automatically presumed to be high-impact. For AI use cases in these categories, an appropriate agency official must submit written documentation to notify the CAIO when making a determination that a particular AI use case does not actually meet the definition of high-impact. CAIOs are responsible for providing such determinations to OMB upon request. Agencies are also encouraged to identify additional context-specific risks that are associated with their use of such AI and address them as appropriate. CAIOs may revisit any determinations made within their agency to conclude that an AI use case is considered "high-impact" and must be subject to the minimum risk management practices at any time.

The practices in this section represent an initial baseline for managing risk from the implementation of high-impact AI use cases.[29] Agencies are also encouraged to continue developing their own agency-specific practices, as appropriate and consistent with this memorandum and the principles in Executive Orders 13960 and 14179. Where possible, agencies should streamline approvals for intended use cases that are closely related in their deployment context and have substantially similar risk profiles. In implementing AI risk management for high-impact AI use cases, agencies and their CAIOs are responsible for the following:

i. Implementing Risk Management Practices and Termination of Non-Compliant AI. Within 365 days of the issuance of this memorandum, agencies must document implementation of the minimum practices in Section 4(b) of this memorandum for high-impact uses of AI and be prepared to report them to OMB, as part of periodic accountability reviews, the annual AI use case inventory, or upon request as determined

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[25] Although elements of the Intelligence Community are not required to implement these practices, they are encouraged to do so.

[26] See OMB Memorandum M-19-15, *Improving Implementation of the Information Quality Act,* https://trumpwhitehouse.archives.gov/wp-content/uploads/2019/04/M-19-15.pdf.

[27] AI may be integrated in decision or activity pipelines in high-impact categories without meeting the definition of high-impact because the AI's output does not actually "serve as a principal basis for" the relevant type of agency action or decision, as described in this memorandum's definition of "high-impact AI." *See* Section 5.

[28] Additional details are provided in Section 6 to assist with risk determinations for high-impact AI.

[29] For AI systems, agencies must continue to follow applicable authorization to operate requirements from OMB Circular No. A-130, *Managing Information as a Strategic Resource.*

by OMB. If a particular high-impact use case is not compliant with the minimum practices then the agency must safely discontinue use of the AI functionality.

Pilot programs for a proposed AI use case are exempt from the minimum risk management practices, provided that:

A. the program is of limited scale and duration;
B. the agency CAIO has certified that the pilot may go forward, and that certification is tracked centrally;
C. when possible, individuals who may interact with the AI have the ability to opt into and out of participating in the pilot, with sufficient notice to make an informed decision; and
D. minimum risk management practices are applied where practicable.

ii. Authorizing Waivers from Minimum Practices for High-Impact AI. In coordination with other relevant officials, an agency CAIO may waive one or more of the requirements in this section for a specific covered AI application or component after making a written determination, based upon a system-specific and context-specific risk assessment, that fulfilling the requirement would increase risks to safety or rights overall or would create an unacceptable impediment to critical agency operations. An agency CAIO, in coordination with other relevant officials, must certify the ongoing validity of each waiver on an annual basis, and may also revoke a previously issued waiver at any time. The CAIO's responsibility under this paragraph shall not be delegated down to other officials.

iii. Tracking Waivers from Minimum Practices for High-Impact AI. In addition to the certification and publication requirements in Section 4(a)(ii) and Section 4(a)(iv) of this memorandum, CAIOs must centrally track waivers, reassess them if there are significant changes to the conditions or context in which the AI is used, and within 30 days of granting or revoking any waiver, report to OMB on the scope, justification, and evidence supporting that action.

iv. Publicly Reporting Determinations and Waivers. To the extent consistent with law and governmentwide policy, each agency must publicly release a summary describing each individual determination and waiver, as well its justification. OMB will issue detailed instructions for these summaries. Alternatively, agencies must publicly indicate, if the agency has no active determinations or waivers.

b. Implementing Minimum Risk Management Practices for High-Impact AI

Agencies must implement the following minimum risk management practices for high-impact AI use cases:

i. Conduct Pre-Deployment Testing. Agencies must develop pre-deployment testing and prepare risk mitigation plans that reflect expected real-world outcomes and identify expected benefits to the AI use. In conducting pre-deployment testing, if an agency does not have access to the underlying AI source code, models, or data, the agency must use

alternative test methodologies, such as querying the AI service and observing the outputs or providing evaluation data to the vendor and obtaining results.

ii. Complete AI Impact Assessment. Agencies must complete an AI impact assessment before deploying any high-impact AI use case. These assessments must be updated periodically and throughout the AI's lifecycle, as appropriate, using target variables that anticipate real-world outcomes. The AI impact assessments must be documented and address or include, at a minimum:

A. *the intended purpose for the AI and its expected benefit,* supported by specific metrics or qualitative analysis, assessing impact inclusive of but not limited to costs, customer experience, or expected positive outcomes of AI use, as compared to existing agency processes;

B. *the quality and appropriateness of the relevant data and model capability,* supported by a summary of the data used in the AI's design, development, training, testing, and operation and its fitness for the AI's intended purpose; describe the data collection, and preparation process; and indicate whether the data is to be publicly disclosed as an open government data asset. When applicable, this summary must describe information included in the data about classes protected by Federal nondiscrimination laws;

C. *the potential impacts of using AI,* supported by documentation on potential impacts on the privacy, civil rights, and civil liberties of the public, and of using or not using AI. The assessment should reference privacy impact assessments, CAIO-approved minimum risk management practice waivers or other materials, if relevant, and also describe any planned mitigation measures for anticipated negative impacts, such as unlawful discrimination;[30]

D. *reassessment scheduling and procedures*, supported by schedules for periodic reassessments as well as reassessment requirements following significant modifications to an underlying AI system, in addition to the specific requirements and processes for such testing;

E. *related costs analysis*, supported by a summary of direct costs associated and expected savings, if any;

F. *results of independent review,* supported by an independent reviewer within the agency who has not been involved in the development. The independent reviewer of the impact assessment shall identify any potential concerns or gaps. Any comments provided by the independent reviewer must be included in the impact assessment documentation and shared with the individual accepting the risk for the AI use case when that determination is made; and

[30] Pub. L. No. 107-347, § 208 and OMB Memorandum M-03-22, *OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002*, https://bidenwhitehouse.archives.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2003/m03_22.pdf.

G. *risk acceptance,* supported by a signature from the individual accepting the risk.

iii. Conduct Ongoing Monitoring for Performance and Potential Adverse Impacts. Agencies must conduct testing and periodic human review of AI use cases, where feasible, to identify any adverse impacts to the performance and security of AI functionality, including those that may violate laws governing privacy, civil rights, or civil liberties. Ongoing monitoring must be designed to detect unforeseen circumstances, changes to an AI system after deployment, or changes to the context of use or associated data. Agencies must implement appropriate mitigations and ensure proper system and use documentation; and where possible, develop processes enabling traceability and transparency in this evaluation.

iv. Ensure Adequate Human Training and Assessment. Agencies must ensure there is sufficient and periodic training, assessment, and oversight for operators of AI to interpret and act on the AI's output and manage associated risks. Training should be conducted on a periodic basis, as determined by the agency, and should be specific to the AI system or service being operated and how it is being used.

v. Provide Additional Human Oversight, Intervention, and Accountability. Agencies must ensure human oversight, intervention, and accountability suitable for high-impact use cases. When practicable and consistent with existing agency practices, agencies must ensure that the AI functionality has an appropriate fail-safe that minimizes the risk of significant harm.[31]

vi. Offer Consistent Remedies or Appeals. Agencies must ensure that individuals affected by AI-enabled decisions have access to a timely human review and a chance to appeal any negative impacts, when appropriate. If an agency already has an appeals or human review process in place, such as appeals of adverse actions, it may extend or adapt that process to cover decisions made with AI, consistent with applicable law. Any remedy process should be designed to avoid placing unnecessary burdens on the individual and should follow established guidance for minimizing administrative burdens.

vii. Consult and Incorporate Feedback from End Users and the Public. Agencies must provide an option for end users and the public to submit feedback on the use case, where appropriate, in the design, development, and use of the AI and use such feedback to inform agency decision-making regarding the AI (refer to Section 8 of this memorandum).

[31] For example, an AI-enabled safety mechanism may require an immediate and automated action to prevent a harm from occurring. It would not be practicable in this case to require human intervention to approve the activation of the safety mechanism. However, agencies must still determine the appropriate oversight and accountability processes for such a use of AI.

5. DEFINITIONS

The below definitions apply for the purposes of this memorandum.

Agency: The term "agency" has the meaning provided in 44 U.S.C. § 3502(1).

Artificial Intelligence (AI): The term "artificial intelligence" has the meaning provided in Section 238(g) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019.[32]

For the purposes of this memorandum, the following technical context should guide interpretation of the definition above:

1. This definition of AI encompasses, but is not limited to, the AI technical subfields of machine learning (including deep learning as well as supervised, unsupervised, and semi-supervised approaches), reinforcement learning, transfer learning, and generative AI.
2. This definition of AI does not include robotic process automation or other systems whose behavior is defined only by human-defined rules or that learn solely by repeating an observed practice exactly as it was conducted.
3. For this definition, no system should be considered too simple to qualify as covered AI due to a lack of technical complexity (e.g., the smaller number of parameters in a model, the type of model, or the amount of data used for training purposes).
4. This definition includes systems that are fully autonomous, partially autonomous, and not autonomous, and it includes systems that operate both with and without human oversight.

AI and AI-Enabling Roles: The term "AI and AI-enabling roles" refers to positions whose major duties include contributions that are important for successful and responsible AI outcomes. AI and AI-Enabling Roles include both technical and non-technical roles, such as data scientists, software engineers, data engineers, data governance specialists, privacy officials, statisticians, machine learning engineers, applied scientists, designers, economists, operations researchers, product managers, policy analysts, program managers, behavioral and social scientists, customer experience strategists, human resource specialists, contracting officials, managers, and attorneys.

AI Maturity: The term "AI maturity" refers to a Federal Government organization's capacity to successfully and responsibly adopt AI into their operations and decision-making across the organization, manage its risks, and comply with relevant Federal law, regulation, and policy on AI.

AI Model: The term "AI model" means a component of an information system that implements AI technology and uses computational, statistical, or machine-learning techniques to produce outputs from a given set of inputs.

AI System: The term "AI system" has the definition provided in Section 7223 of the Advancing American AI Act, which states that "[t]he term 'artificial intelligence system'— (A) means any

[32] Pub. L. No. 115-232, § 238(g), https://www.govinfo.gov/content/pkg/PLAW-115publ232/pdf/PLAW-115publ232.pdf.

data system, software, application, tool, or utility that operates in whole or in part using dynamic or static machine learning algorithms or other forms of artificial intelligence, whether— (i) the data system, software, application, tool, or utility is established primarily for the purpose of researching, developing, or implementing artificial intelligence technology; or (ii) artificial intelligence capability is integrated into another system or agency business process, operational activity, or technology system; and (B) does not include any common commercial product within which artificial intelligence is embedded, such as a word processor or map navigation system."

Applied Research: The term "applied research" refers to original investigation undertaken in order to acquire new knowledge to determine the means by which a specific practical aim or objective may be met.

Basic Research: The term "basic research" refers to experimental or theoretical work undertaken primarily to acquire new knowledge of the underlying foundations of phenomena and observable facts without a specific application towards processes or products in mind.

Custom-Developed Code: The term "custom-developed code" has the meaning provided in Appendix A of OMB Memorandum M-16-21.

Customer Experience: The term "customer experience" means the public's perceptions of, and overall satisfaction with, the interactions with an agency, product, or service.

Data Asset: The term "data asset" has the meaning provided in 44 U.S.C § 3502.

Federal Information: The term "Federal information" has the meaning provided in OMB Circular A-130.

High-Impact AI: AI with an output that serves as a principal basis for decisions or actions with legal, material, binding, or significant effect on:

1. an individual or entity's civil rights, civil liberties, or privacy; or
2. an individual or entity's access to education, housing, insurance, credit, employment, and other programs;
3. an individual or entity's access to critical government resources or services;
4. human health and safety;
5. critical infrastructure or public safety; or
6. strategic assets or resources, including high-value property and information marked as sensitive or classified by the Federal Government.

Information Technology: The term "information technology" has the definition given in 40 U.S.C. § 11101(6).

Model Weight: The term "model weight" means a numerical parameter within an AI model that helps determine the model's outputs in response to inputs.

National Security System: The term "National Security System" has the meaning provided in 44 U.S.C. § 3552(b)(6).

Open Government Data Asset: The term "open government data asset" has the meaning provided in 44 U.S.C § 3502.

Open Source Software: The term "open source software" has the meaning provided in Appendix A of OMB Memorandum M-16-21.

Significant Modification: The term "significant modification" refers to an update to an AI application or to the conditions or context in which it is used, such as through changing its functionality, underlying structure, or performance, that meaningfully alters the AI's impact, rendering prior evaluations, training, or documentation misleading to users, overseers, or individuals affected by the system. This includes significantly changing the context, scope, or intended purpose in which the AI is used.

6. PURPOSES FOR WHICH AI IS PRESUMED TO BE HIGH-IMPACT

The following is a list of categories for which the use or expected use of AI that serves as a principal basis for an agency decision or action is presumed to be high-impact. However, the following is not an exhaustive list of potentially high-impact AI use cases and agencies should base any final decisions for whether an AI use case is high-impact on the definition provided in Section 6.

a. Safety-critical functions of critical infrastructure or government facilities, emergency services, fire and life safety systems within structures, food safety mechanisms, or traffic control systems and other systems controlling physical transit;
b. Physical movements of robots, robotic appendages, vehicles or craft (whether land, sea, air, or underground), or industrial equipment that have the potential to cause significant injury to humans;
c. Use of kinetic or non-kinetic measures for attack or active defense in real world circumstances that could cause significant injury to humans;
d. Transport, safety, design, development, or use of hazardous chemicals or biological agents;
e. Design, construction, or testing of equipment, systems, or public infrastructure that would pose a significant risk to safety if they failed;
f. In healthcare contexts, the medically relevant functions of medical devices; patient diagnosis, risk assessment, or treatment; the allocation of care in the context of public insurance; or the control of health-insurance costs and underwriting;
g. Control of access to, or the security of, government facilities;
h. Adjudication or enforcement of sanctions, trade restrictions, or other controls on exports, investments, or shipping;
i. The blocking, removal, hiding, or limitation of the reach of protected speech;
j. In law enforcement contexts, production of risk assessments about individuals; identification of criminal suspects; forecast of crime; tracking of non-governmental vehicles over time in public spaces; application of biometric identification (e.g., iris, facial, fingerprint, or gait matching); facial reconstruction based on genetic information; social media monitoring; application of digital forensic techniques; use of cyber intrusions; physical location-monitoring or tracking of individuals; detection of weapons or violent activity; or determinations related to recidivism, sentencing, parole, supervised release, probation, bail, pretrial release, or pretrial detention;
k. Preparation or adjudication of risk assessments related to foreign nationals seeking temporary or permanent access to the U.S. or its territories including related to immigration, asylum, detention, or travel approval status;
l. Use of biometric identification for one-to-many identification in publicly accessible spaces;
m. Ability to apply for, or adjudication of, requests for critical federal services, processes, and benefits to include loans and access to public housing; determination of continued eligibility for ongoing benefits; the control of access—through biometrics or other means (e.g., signature matching)—to IT systems for accessing services for benefits; detection of fraudulent use or attempted use of government services; adjudication of penalties in the context of government benefits;

n. Determination of the terms or conditions of Federal employment, including pre-employment screening, reasonable accommodation, pay or promotion, performance management, hiring or termination, or recommending disciplinary action; reassignment of workers to new tasks or teams; or
o. Provision of language translation (e.g., foreign translation and audiovisual translation) when responses are legally binding or for an interaction that directly informs an agency decision or action.

7. METHODS OF UNDERSTANDING AI RISK MANAGEMENT

Below are ways in which risks may arise from the use of AI. The term "risks from the use of AI" refers to risks related to efficacy, safety, fairness, transparency, accountability, appropriateness, or lawfulness of a decision or action resulting from the use of AI to inform, influence, decide, or execute that decision or action.

This includes such risks regardless of whether:

1. the AI merely informs the decision or action, partially automates it, or fully automates it;
2. there is or is not human oversight for the decision or action;
3. it is or is not readily apparent that a decision or action took place, such as when an AI application performs a background task or silently declines to take an action; or
4. the humans involved in making the decision or action or that are affected by it are or are not aware of how or to what extent the AI influenced or automated the decision or action.

The following factors can create, contribute to, or exacerbate risks from the use of AI:

1. AI outputs that are inaccurate or misleading;
2. AI outputs that are unreliable, ineffective, or not robust;
3. AI outputs that discriminate on the basis of a protected characteristic;
4. AI outputs that contribute to actions or decisions resulting in harmful or unsafe outcomes, including AI outputs that lower the barrier for people to take intentional and harmful actions;
5. AI being used for tasks to which it is poorly suited or being inappropriately repurposed in a context for which it was not intended;
6. AI being used in a context in which affected people have a reasonable expectation that a human is or should be primarily responsible for a decision or action; and
7. the adversarial evasion or manipulation of AI, as in the case of an entity purposefully inducing AI to misclassify an input.

This definition applies to risks specifically arising from using AI and that affect the outcomes of decisions or actions. It does not include all risks associated with AI, such as risks related to the privacy, security, and confidentiality of the data used to train AI or used as inputs to AI models.

8. Public Consultation and Feedback

To carry out public consultations and feedback processes, agencies are recommended to take appropriate steps to solicit public input, which could include:[33]

1. direct usability testing, such as observing users interacting with the system;
2. general solicitations of comments from the public, such as a request for information in the *Federal Register* or a "Tell Us About Your Experience" sheet with an open-ended space for responses;
3. post-transaction customer feedback collections;[34]
4. public hearings or meetings; and
5. any other transparent process that seeks public input, comments, or feedback from the affected groups in a meaningful, accessible, and effective manner.

[33] Agencies are encouraged to engage with OMB on whether they are required to submit information collection requests for OMB clearance under the Paperwork Reduction Act (44 U.S.C. § 3507), https://uscode.house.gov/view.xhtml?req=44+U.S.C.+%EF%BF%BD+3507&f=treesort&fq=true&num=20&hl=true&edition=prelim&granuleId=USC-prelim-title44-section3507, for the purposes of these consultations and feedback processes.

[34] Information on post-transaction customer feedback surveys can be found in OMB Circular A-11, Section 280 – Managing Customer Experience and Improving Service Delivery, https://www.performance.gov/cx/assets/files/2019_a11%20280.pdf.

Consolidated Table of Actions

Responsible Entity	***Action***	***Section***	***Deadline***
Each Agency	Retain or designate a Chief AI Officer.	3(a)(i)	60 days
Each CFO Act Agency	Convene relevant agency officials to coordinate and govern issues tied to the use of AI within the Federal Government through an agency AI Governance Board.	3(a)(ii)	90 days
OMB	Convene a Chief AI Officer Council, led by the Director of OMB, or designated senior official.	3(c)(i)	90 days
Each CFO Act Agency	Develop and release publicly an agency strategy for removing barriers to the use of AI and advancing agency AI maturity.	2(a)	180 days
Each Agency	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.	3(b)(ii)	180 days, and every two years until 2036
Each Agency	Update internal policies on IT infrastructure, data, cybersecurity, and privacy.	3(b)(iii)	270 days
Each Agency	Develop a Generative AI policy.	3(b)(iv)	270 days
Each Agency*	Implement the minimum risk management practices for high-impact uses of AI.	4(a)(i)	365 days
Each Agency*	Report directly to OMB any determinations and waivers that are granted or revoked.	4(a)(iii)	Annually and 30-days after significant modifications
Each Agency*	Publicly report determinations and waivers for AI use cases.	4(a)(iv)	365 days
Each Agency**	Publicly release an AI use case inventory consistent with OMB instructions.	3(b)(v)	Annually

* Excluding elements of the Intelligence Community.

** Excluding elements of the Intelligence Community. The Department of Defense is exempt from the requirement to inventory individual use cases.

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

THE DIRECTOR

April 3, 2025

M-25-22

MEMORANDUM FOR THE HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Russell T. Vought
Director

SUBJECT: Driving Efficient Acquisition of Artificial Intelligence in Government

1. OVERVIEW

Executive Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government*,[1] charges Federal agencies with using safe and secure artificial intelligence (AI) in innovative ways to improve government efficiency and mission effectiveness. In carrying out this direction, agencies must procure effective and trustworthy AI capabilities in a timely and cost-effective manner. Consistent with the Advancing American AI Act,[2] Executive Order 14179, *Removing Barriers to American Leadership in Artificial Intelligence*,[3] and Office of Management and Budget (OMB) Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*, this memorandum provides guidance to agencies to improve their ability to acquire AI responsibly. This memorandum rescinds and replaces OMB Memorandum M-24-18, *Advancing the Responsible Acquisition of Artificial Intelligence in Government*. To that end, there are three grounding themes that drive this memorandum's requirements:

Ensuring the Government and the Public Benefit from a Competitive American AI Marketplace. Competition in the marketplace enables the government to acquire the best solutions at lower cost to the taxpayer. As agencies seek to accelerate the adoption of AI-enabled services, they must pay careful attention to vendor sourcing, data portability, and long-term interoperability[4] to avoid significant and costly dependencies on a single vendor. The

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[1] Executive Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence*. December 3, 2020, https://www.federalregister.gov/documents/2020/12/08/2020-27065/promoting-the-use-of-trustworthy-artificial-intelligence-in-the-federal-government.

[2] Pub. L. No. 117-263, div. G, title LXXII, subtitle B, § 7224(d)(1) (codified at 40 U.S.C. 11301 note), https://www.congress.gov/117/plaws/publ263/PLAW-117publ263.pdf.

[3] Executive Order 14179, *Removing Barriers to American Leadership in Artificial Intelligence*. January 31, 2025. https://www.federalregister.gov/documents/2025/01/31/2025-02172/removing-barriers-to-american-leadership-in-artificial-intelligence.

[4] The term "interoperability" generally refers to the ability of two or more systems, products, or components to exchange information and use the information that has been exchanged, including to operate effectively together.

government must communicate clear and specific requirements that make it easy for vendors to offer state-of-the-art AI capabilities to support efficient and effective public services.

Safeguarding Taxpayer Dollars by Tracking AI Performance and Managing Risk. AI presents a tremendous opportunity to improve government efficiency and effectiveness. To achieve this promise, agencies must ensure that the AI systems they procure are fit for purpose and deliver consistent results that preserve public trust in the manner outlined in Executive Order 13960.[5]

Promoting Effective AI Acquisition with Cross-Functional Engagement. Robust collaboration is a foundational principle of the Executive Branch's acquisition process and remains critical for surfacing potential issues sooner rather than later to avoid obstacles and risks in procuring new technology, such as AI. The novel challenges that AI introduces require agile engagement from agency officials with varied expertise to fully address during acquisition.

2. SCOPE

The Advancing American AI Act ("the Act") directs OMB to develop an initial means by which to ensure that contracts for the acquisition of an AI system or service align with the guidance required by the AI in Government Act of 2020, which was updated in OMB Memorandum M-25-21, and to advance the aims identified in section 7224(d)(1) of the Act. This memorandum does not supersede, and should be considered in concert with, other more general Federal policies that apply to the acquisition of AI. Agencies must comply with all applicable OMB policies and coordinate compliance across their components with all appropriate officials. Agency officials retain their existing authorities and responsibilities established in other laws and policies.

a. **Covered Agencies.** Except as specifically noted, this memorandum applies to all agencies defined in 44 U.S.C. § 3502(1). As noted in the relevant sections, some requirements in this memorandum apply only to Chief Financial Officers Act (CFO Act) agencies, as identified in 31 U.S.C. § 901(b). The requirements in this memorandum do not apply to elements of the Intelligence Community, as defined in 50 U.S.C. § 3003.

b. **Covered AI.** This memorandum provides requirements and recommendations that, as described in more detail below, apply to AI systems or services that are acquired by or on behalf of covered agencies.

The term *AI system*, as used in the Act and this memorandum, includes data systems, software, applications, tools, or utilities "established primarily for the purpose of researching,

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This includes ensuring that open and standard data formats and application programming interfaces (APIs) are used so that foundational components can be used, including to build for new use cases, without obscure proprietary technologies or licensing.

[5] Section 2 of Executive Order 13960 states that "[i]t is the policy of the United States to promote the innovation and use of AI, where appropriate, to improve Government operations and services in a manner that fosters public trust, builds confidence in AI, protects our Nation's values, and remains consistent with all applicable laws, including those related to privacy, civil rights, and civil liberties."

developing, or implementing artificial intelligence technology,"[6] as well as data systems, software, applications, tools, or utilities where an AI capability "is integrated into another system or agency business process, operational activity, or technology system."[7] The term excludes, however, "any common commercial product within which artificial intelligence is embedded, such as a word processor or map navigation system."[8]

In determining whether a product that integrates AI functionality is excepted under this provision, agencies should assess both (1) whether the product is widely available to the public for commercial use, as opposed to products that are not readily available to the general public or are specialized or customized for agency use, and (2) whether the AI is embedded in a product that has substantial non-AI purposes or functionalities, as opposed to products for which AI is a primary purpose or functionality. For example, word processing software that is primarily used for its AI functionality likely would be covered by this memorandum. On the other hand, common commercial word processing software that has substantial non-AI purposes or functionalities, but for which AI is embedded for functions like suggesting text or correcting spelling and grammar, would likely fall within the exception and thus would not be covered by the requirements of this memorandum.

This memorandum does not govern:

i. Agencies' regulatory actions designed to prescribe law or policy regarding non-agency uses of AI;[9]
ii. Agencies' assessments of particular AI applications because the AI provider is the target or potential target of a regulatory enforcement, law enforcement, or national security action; or the agency is evaluating the AI application because it was used by a criminal suspect;[10]
iii. Agencies' development of metrics, methods, and standards to test and measure AI, where such metrics, methods, and standards are for use by the general public or the government as a whole, rather than to test AI for a particular agency application;[11]
iv. Agencies' acquisition of AI to carry out basic, applied, or experimental research[12] except where the purpose of such research is to develop particular AI applications within the agency; or

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[6] Pub. L. No. 117-263, div. G, title LXXII, subtitle B, § 7223(4) (codified at 40 U.S.C. 11301 note), https://www.congress.gov/117/plaws/publ263/PLAW-117publ263.pdf.
[7] *Id.*
[8] *Id.*
[9] For guidance on regulatory and non-regulatory approaches to AI applications developed and deployed outside of the Federal government and best practices to reduce barriers to the development and adoption of AI technologies, agencies should consult OMB Memorandum M-21-06, Guidance for Regulation of Artificial Intelligence Applications (Nov. 17, 2020), https://trumpwhitehouse.archives.gov/wp-content/uploads/2020/11/M-21-06.pdf.
[10] AI is not in scope when it is the target or potential target of such an action, but it is in scope when the AI is used to carry out an enforcement action. For example, when evaluating an AI tool to determine whether it violates the law, the AI would not be in scope; if an agency was using that same AI tool to assess a different target, then the AI would be in scope.
[11] Examples include agency actions to develop, for general use, standards or testing methodologies for evaluating or red-teaming AI capabilities.
[12] For more information about basic, applied, or experimental research, reference the National Science

v. AI used incidentally by a contractor during performance of a contract (e.g., AI used at the option of a contractor when not directed or required to fulfill requirements).

c. Future Contracts for AI. This memorandum shall apply to any contract awarded pursuant to a solicitation issued on or after the date that is 180 days after issuance of this memorandum, as well as to any option to renew or extend the period of performance exercised on an existing contract after the date that is 180 days after the issuance of this memorandum.

d. Applicability to National Security Systems. This memorandum does not apply to AI acquired for use as a component of a National Security System.[13]

3. AGENCY-LEVEL REQUIREMENTS

In addition to the actions described in Section 4 below, this memorandum directs agencies to:

b. Update Agency Policies. Within 270 days of the issuance of this memorandum, agencies must revisit, and update where necessary, existing internal procedures on acquisition to comply with the requirements of this memorandum and ensure the agency's use of the acquired AI will conform to OMB Memorandum M-25-21. At a minimum, agencies must update internal procedures on acquisition to enable relevant agency officials to:

i. Review planned acquisitions involving an AI system or service and provide any feedback on AI performance and risk management practices as necessary, consistent with guidance in Section 4 of this memorandum;
ii. Convene a cross-functional team of relevant agency officials[14] to include in the coordination and decision-making processes associated with the acquisition, as discussed in Section 4(a)(i) of this memorandum;
iii. Ensure use of appropriate contract terms for intellectual property (IP) rights, in alignment with paragraph (d) below.

c. Maximize the Use of American-Made AI. Executive Order 14179 recognizes the importance of American AI development to promote human flourishing, economic competitiveness, and national security. Consistent with applicable law, it is the policy of the United States to buy American and to maximize the use of AI products and services that are developed and produced in the United States.[15]

Foundation's Frascati Manual. The full Frascati Manual and current and upcoming online Annexes are available at http://oe.cd/frascati.

[13] The term "National Security System" has the meaning provided in 44 U.S.C. § 3552(b)(6).

[14] Examples of officials with relevant equities will likely include those with expertise in acquisition (including competition advocates), IT, cybersecurity, privacy, confidentiality, civil rights, civil liberties, budgeting, data, legal, program evaluation, and other areas as necessary.

[15] Executive Order 14179.

d. **Protect Privacy.** Consistent with OMB Circular No. A-130,[16] agencies shall establish policies and processes, including contractual terms and conditions, that ensure compliance with privacy requirements in law and policy whenever agencies acquire an AI system or service, or an agency contractor uses an AI system or service, that will create, collect, use, process, store, maintain, disseminate, disclose, or dispose of Federal information containing personally identifiable information (PII). Agencies shall ensure that Senior Agency Officials for Privacy[17] have early and ongoing involvement in agency acquisition or contractor use of AI involving PII, including during pre-solicitation acquisition planning and when defining requirements, to manage privacy risks and ensure compliance with law and policy related to privacy.

e. **Protect IP Rights and Use of Government Data.** Consistent with applicable laws and government-wide policy,[18] agencies must have appropriate processes for addressing use of government data and include appropriate contractual terms that clearly delineate the respective ownership and IP rights of the government and the contractor. Careful consideration of respective IP licensing rights is even more important when an agency procures an AI system or service, including where agency information is used to train, fine-tune, and develop the AI system. Each agency must revisit, and update where necessary, its process for the treatment of data ownership and IP rights in procurements for AI systems or services. Agencies should prioritize standardization across contracts where possible. The Chief AI Officer Council will periodically review agency processes to encourage best practices and interagency harmonization. Agency processes should address the following:

    i. Scope. Scoping licensing and other IP rights appropriately, based on the intended use of AI, to avoid vendor lock-in;

    ii. Timeline. Ensuring components necessary to operate and monitor the AI system or service remain available for the acquiring agency to access and use for as long as it may be necessary;

    iii. Data Handling. Providing clear guidance on handling, access, and use of agency data or information to ensure, among other purposes, that such information must only be collected and retained by a vendor when reasonably necessary to serve the intended purposes of the contract;

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[16] See, for example, OMB Circular No. A-130, Main Body § 5(a)(1)(b)(ii) and Appendix I § 4(j)(1), https://bidenwhitehouse.archives.gov/wp-content/uploads/legacy_drupal_files/omb/circulars/A130/a130revised.pdf.

[17] Per OMB Memorandum M-16-24, Role and Designation of Senior Agency Officials for Privacy (September 15, 2016): "At the discretion of the SAOP and consistent with applicable law, other qualified agency personnel may perform particular privacy functions that are assigned to the SAOP," https://bidenwhitehouse.archives.gov/wp-content/uploads/legacy_drupal_files/omb/memoranda/2016/m_16_24_0.pdf.

[18] See, for example: OMB Circular No. A-130 and OMB Memorandum M-25-05, *Phase 2 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Open Government Data Access and Management Guidance,* https://www.whitehouse.gov/wp-content/uploads/2025/01/M-25-05-Phase-2-Implementation-of-the-Foundations-for-Evidence-Based-Policymaking-Act-of-2018-Open-Government-Data-Access-and-Management-Guidance.pdf.

iv. Use of Government Data. Ensuring contracts permanently prohibit the use of non-public inputted agency data and outputted results to further train publicly or commercially available AI algorithms, consistent with applicable law, absent explicit agency consent; and

v. Documentation, Transparency, and Accessibility. As noted in OMB Memorandum M-25-21, agencies, are encouraged, where appropriate, to prioritize obtaining documentation that facilitates transparency and explainability,[19] and that ensures an adequate means of tracking performance and effectiveness for procured AI.

f. Spotlight AI Acquisition Authorities, Approaches, and Vehicles. Within 100 days of the issuance of this memorandum, GSA, in collaboration with OMB and relevant interagency councils, will develop a plan to release publicly available guide(s) to assist the acquisition workforce with the procurement of AI systems, addressing potential acquisition authorities, approaches, and vehicles as well as their potential benefits and drawbacks, and any other resources that agencies can immediately leverage for AI procurement.

g. Contribute to a Shared Repository of Best Practices. Within 200 days of the issuance of this memorandum, GSA, in coordination with OMB, will develop a web-based repository, available only to Executive Branch agencies, to facilitate the sharing of information, knowledge, and resources about AI acquisition. Agencies should contribute tools, resources, and data-sharing best practices developed for improved AI acquisition, which may include language for standard contract clauses and negotiated costs for common AI systems and other relevant artifacts.[20]

h. Determine Necessary Disclosures of AI Use in the Fulfillment of a Government Contract. While this memorandum primarily concerns the deliberate acquisition of AI systems, vendors will likely increasingly utilize AI as part of contract performance in situations where the government may not anticipate the use of that AI. Agencies must be cognizant of the risks posed by the unsolicited use of AI systems by vendors and determine whether there are circumstances that merit including a provision in a solicitation requiring disclosure of AI use as part of any given contract's performance.

4. AI ACQUISITION LIFECYCLE GUIDANCE

The below subsections delineate requirements and recommendations for agencies as part of their AI acquisition practices. As noted above, this guidance should be considered in concert with any other relevant laws or policy that may apply to such a procurement. Throughout the AI acquisition lifecycle, agencies shall consider and mitigate, as appropriate, risks to privacy, civil liberties, and civil rights.

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[19] In this context, explainability refers to an agency's ability to provide evidence or reasons for system output. A significant enabler of explainability is clear documentation that is meaningful or understandable to individual users and reflects the process for model-driven development.

[20] Examples of other relevant artifacts might include negotiated costs for common AI systems, best practices for performance-based acquisition, and approaches for structuring and including provisions related to data and model documentation, availability, and transparency to support ongoing performance monitoring, testing and evaluation, and program evaluation to ensure effective and efficient deployment and service delivery.

a. Identification of Requirements.

i. Convening a Cross-Functional Team. Based on the nature of the requirements involved in the procurement, agencies should follow their designated process for convening an internal cross-functional team, as required by Section 3(a).[21] This team should then work to inform the procurement of AI systems or services in a streamlined manner that apportions time and resources according to the requirements of the procurement, including associated complexity and risk, to support effective, efficient, and responsible development and execution of ongoing performance monitoring. The team should assist in creating an initial list of potential risks that should be evaluated based on the type of AI system or service under consideration. In particular, the team must identify potential risks to the agency's implementation of the nine principles for use of AI in government articulated in Executive Order 13960.[22]

ii. Determining the Use of High-Impact AI. During this phase, agencies must identify reasonably foreseeable use cases arising from the use of an AI system or service, and to the greatest extent practicable, make an initial determination of whether a system is likely to host high-impact AI use cases, as defined by OMB Memorandum M-25-21.[23] This initial determination will assist in developing key questions to investigate as part of market research.

b. Market Research & Planning.

i. Broad Market Research. Agencies should take advantage of the dynamic evolution of the AI market to seek state-of-the-art AI capabilities by conducting thorough market research. As part of this work, agencies should seek to leverage existing interagency knowledge sharing and acquisition platforms across the Executive Branch. They should also, when appropriate, seek out novel AI capabilities from new entrants that have not previously considered working with the Executive Branch. To support market research, OMB will develop additional "playbooks" specific to various types of AI (e.g., AI-based biometrics, specialized computing infrastructure, and generative AI), designed to highlight the particular considerations and nuances inherent in these specialized areas.

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[21] Refer to the list identified in Footnote 13 regarding the potential makeup of such teams.

[22] Executive Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence*. December 3, 2020, https://www.federalregister.gov/documents/2020/12/08/2020-27065/promoting-the-use-of-trustworthy-artificial-intelligence-in-the-federal-government.

[23] The term "high-impact AI" has the meaning provided in OMB Memorandum M-25-21, as AI with an output that serves as the primary basis for decisions or actions with legal, material, binding, or significant effect on: an individual or entity's civil rights, civil liberties, or privacy; or an individual or entity's access to education, housing, insurance, credit, employment, and other programs; or an individual or entity's access to critical government resources or services; or human life, well-being; or critical infrastructure or public safety; or strategic assets or resources, including high-value property and information marked as sensitive or classified by the Federal Government.

ii. Product Demonstration. Where practicable, agencies should seek detailed demonstrations and tests of potentially useful AI systems or services in scenarios that closely reflect the intended real-world operating environment, including the specific characteristics of agency networks. These demonstrations should be used to help interrogate capabilities and limitations of a given provider. This phase should also serve as an opportunity to identify any obstacles to long-term cost-effectiveness with regard to vendor lock-in.[24]

iii. Performance-Based Acquisition Techniques. Agencies are strongly encouraged to use performance-based techniques, as outlined below, to identify requirements and contract terms. Resulting performance-based requirements allow agencies to understand and assess vendor claims about their proposed use of AI systems or services prior to contract award, acquire AI capabilities that address their needs, and perform post-award monitoring. Focusing acquisition on achieving desired performance outcomes directly facilitates an agency's ability to ensure its needs are met by defining metrics to maintain and improve performance of the AI system or service. Performance-based techniques include:

A. *Statements of Objectives (SOO) and Performance Work Statements (PWS).* SOO and PWS provide agencies with more flexibility to acquire AI systems or services that meet agencies' outcome-based needs, but may not meet unnecessary or overly-limiting requirements in Statements of Work (SOW).

B. *Quality Assurance Surveillance Plans (QASP).* QASPs can help agencies overcome challenges in defining relevant performance metrics pre-solicitation and can enable a more collaborative process for negotiating a QASP that meets agency needs and objects. Government personnel should be prepared to assume a more active role in performance monitoring.

C. *Contract incentives.* Contract incentives can be used to improve the performance and interoperability of AI systems and services. Incentives can be based on metrics and provisions in QASPs. When determining whether to include performance-based incentives, agencies must carefully consider whether the established metrics are correctly tied to desired business and mission outcomes, and whether they can adequately measure baseline performance of the AI systems or services.

c. Solicitation Development.

i. AI Use Transparency Requirements. When practicable, agencies must disclose in solicitations whether a planned use of an AI system meets the threshold of a high-impact use case or if there is a reasonable likelihood for such a high-impact use case to

[24] This recommendation generally refers to approaches to storing and representing data and models in a manner that allows for them to be easily reused without an agency, or another vendor, having to spend additional money to perform burdensome data conversions, build an entirely separate or redundant storage system, or otherwise duplicative work that is not a cost-effective use of taxpayer dollars.

occur during the life of the contract. Additionally, for AI systems with potential or expected high-impact use cases, agencies must inform vendors of reasonable transparency and documentation requirements that will be placed on the vendor to enable agency compliance with the requirements in OMB Memorandum M-25-21. For example, agencies should require sufficient descriptive information from vendors to complete the required AI Impact Assessment for high-impact use cases.

ii. Protections Against Vendor Lock-In. In general, agencies should include provisions in the solicitation reflecting the agency's interest in AI proposals that reduce the risk of vendor lock-in, such as requirements regarding knowledge transfer, clear data and model portability practices, clear licensing terms, and pricing transparency.[25]

iii. IP Rights and Use of Government Data. Consistent with the processes developed pursuant to section 3(d) above, agencies must include appropriate terms related to IP rights and lawful use of government data.

d. Selection and Award

i. Testing and Evaluation. When evaluating proposals agencies must, to the greatest extent practicable, test proposed solutions to understand the capabilities and limitations of any offered AI system or service. As part of this work, agencies should consider whether it is appropriate to create a testing environment in agency networks specifically to enable testing of proposed solutions on government-owned systems.

ii. Opportunity and Risk Re-Evaluation. Prior to selection, agencies should assess proposals for potential new AI-related risks that were not previously identified and should review proposals for any challenges that might arise with compliance requirements identified in OMB Memorandum M-25-21.

iii. Contract Terms. Consistent with law and government-wide policy, where applicable, agencies must include terms that address the following in contracts for AI systems and services:

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[25] To promote cost-effectiveness and foster competition, there are several vendor practices agencies can seek to leverage as evaluation criteria. Some examples include the use of well-defined application programming interfaces (APIs), particularly within acquired architectures, that promote interoperability with other elements of the technical stack; robust documentation regarding decisions related to foundational model development, coding languages used, testing scripts and protocols, and other decisions related to the development of AI tools in a developer experience framework that facilitates the transition of AI tools from one vendor to the next; open-source licenses to vendor's products, including AI models, AI systems, AI services, and datasets; and transparent and non-discriminatory pricing practices. Examples of the latter practices include offering products without bulk pricing arrangements, tying arrangements, steering arrangements, minimum spend requirements, or other agreements that encourage consolidation of spending with one vendor or one group of vendors through fixed contract lengths, exclusive discounts, or other incentives; offering systems or services at uniform and publicly available prices and not engaging in self-preferencing; providing equal access on comparable terms to downstream businesses, such as by refraining from self-preferencing vertically integrated systems or services; and providing information about which subcontractors, including system integrators, were engaged, how they were selected, and how their involvement impacts price.

A. *IP Rights and Use of Government Data.* Terms on this subject must be consistent with the processes adopted by the agency per Section 3(d) above.

B. *Privacy.* Privacy considerations are described in Section 3(c) of this memorandum.

C. *Vendor Lock-In Protections.* As described identified during solicitation development, terms on this subject are necessary to reduce the risk that switching vendors could become cost-prohibitive. Protections against vendor lock-in can vary, but include requirements for vendor knowledge transfers, data and model portability, providing agencies with rights to code and models produced in performance of a contract, and transparency in licensing and pricing.

D. *OMB Memorandum M-25-21 Compliance Requirements.* Contracts must ensure compliance with minimum risk management practices for high-impact use cases as required under M-25-21.

E. *Ongoing Testing and Monitoring.* Contractual terms must provide the contracting agency the ability to regularly monitor and evaluate (e.g., on a quarterly or biannual basis, based on the needs of the program) performance, risks, and effectiveness of an AI system or service. To achieve that outcome:

   I. Agencies must use data they have defined (e.g., agency validation and testing datasets) when conducting any independent evaluations to ensure the AI system or service is fit for purpose. The data used when conducting independent evaluations should not be accessible to the vendor, and should be as similar as possible to the data used when the system is deployed;
   II. Vendors must provide the access and time necessary for agencies to complete independent evaluation. Alternatively, agencies may allow vendors to complete that testing when most appropriate, but must closely monitor such instances and require testing results detailed enough for the testing to be independently verified or reproduced, if practicable; and
   III. Contracts must detail the examination, testing, and validation procedures of the vendor and must not prohibit agencies from internally disclosing how the vendor conducts testing or the results of testing.

F. *Vendor Performance Requirements.* Federal agencies are encouraged to require vendors to regularly monitor an AI system's performance and rectify behavior defined as unacceptable, require vendors to meet performance standards before deploying a new version of an AI system or service or to roll-back to a previous version if a new version fails to meet performance standards, and incentivize model satisfactory performance through performance-based contracting.

G. *New Feature Notification.* As required by Section 3(g), agencies should consider, where relevant, requiring vendors to provide a notification to relevant agency stakeholders prior to the integration of new AI enhancements, features, or

components into systems and services being delivered under contract. Vendor notification to agencies should follow existing processes, where practicable, and should be determined by the relevant agency stakeholders. Agencies should also ensure, prior to release, that compliance requirements will be followed, consistent with OMB Memorandum M-25-21.

e. Contract Administration

i. Authorization To Operate Compliance. Consistent with the requirements of OMB Circular No. A-130 and other policies established pursuant to the Federal Information Security Modernization Act, any AI systems and services operated as an information system by or on behalf of an agency must receive an authorization to operate from an appropriate agency official prior to deployment.[26]

ii. Contractual Oversight. Agencies must perform effective system oversight consistent with the terms of the contract. This includes monitoring system performance to ensure that any emerging risks to privacy, civil rights, and civil liberties are identified and mitigated as appropriate.

iii. Performance and Cost Justification. As part of contract administration, agencies should, to the extent practicable, arrange for periodic evaluation of the AI system or service's value to the government. Such an evaluation should take into account comparative system effectiveness and efficiency for purpose, the risk associated with use, and any ongoing operation and maintenance costs. Where practicable, agencies should consider terms to solicit and incorporate feedback from end users, program managers, and other relevant stakeholders to inform modifications that continuously improve performance of the AI system or service in the context of the agency's mission.

iv. Sunset Criteria. Where practicable, agencies should determine criteria for sunsetting the use of an AI system. Changes in costs, agency needs, vendor-proposed requirements, or model performance may signal that an agency should reconsider continued use.

f. Contract Closeout

i. Vendor Lock-In Protection. As soon as a decision is made not to extend a contract for an AI system or service, agencies should work with the vendor to implement any contractual terms related to ongoing rights and access to any data or derived products resulting from the services provided under the contract. This includes ensuring a mutual understanding of format and usability of any data, and any circumstances that

[26] *See* 44 U.S.C. § 3554 (making agency heads responsible for providing appropriate information security protections for Federal information and information systems); *see also* OMB Circular No. A-130, Appendix I § (4)(d) (requiring senior Federal officials at agencies to complete authorizations to operate for each information system).

could result in expiration of access, as well as a plan for conducting any transfers of data or other derived assets necessary per the terms of the contract.