Artificial Intelligence OMB M-24-10 Compliance Plan

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U.S. AGENCY FOR GLOBAL MEDIA

Purpose

The AI in Government Act of 2020 and the Office of Management and Budget (OMB) Memorandum M-24-10, *Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence,* direct each agency to submit to OMB and post publicly on its website either a plan to achieve consistency with M-24-10 or a written determination that the agency does not use and does not anticipate using covered AI.

This document outlines the minimum information required for the U.S. Agency for Global Media's (USAGM) compliance plans that will satisfy the requirements of Section 3(a)(iii) of M-24-10 and Section 104(c) of the AI in Government Act. USAGM will report compliance with the individual use-case-specific practices mandated in Section 5(c)(iv) and (v) of M-24-10 separately through the annual AI use case inventory.

Authority

The establishment of AI policies within USAGM is primarily guided by mandates from OMB, Presidential Directives, and other federal regulations. In particular, OMB mandates, such as the Federal Data Strategy, the Cloud Smart Strategy, and OMB's draft memo for *Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence,* provide a framework for leveraging data as a strategic asset and adopting modern technology practices, including AI. Presidential directives and national strategies, such as the Executive Order on the *Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence* (October 20, 2023), further outline the government's commitment to advancing AI technology for the public good while ensuring ethical, secure, and transparent use. These authorities collectively empower federal agencies to develop and implement AI policies that align with national priorities, promote innovation, and uphold the principles of accountability and fairness in the use of AI technologies.

Scope

This AI Compliance plan applies to all organizational units of the USAGM to include all federal components and grantees who connect to the USAGM information technology equipment, computer resources, information technology systems, applications, data, storage, and networks ("Agency Information Technology") owned by the agency or operated on behalf of the agency. This encompasses systems managed or hosted by third parties on behalf of the agency. While an organizational unit may adopt a different standard operating procedure, or tailor the journalistic AI usage guidelines, it must abide by the overall agency AI compliance plan outlined in this document.

This plan covers all technology systems that deploy AI technology, hereinafter called "AI systems." AI is a machine-based system that can make predictions, recommendations, or decisions influencing real or virtual environments for a given set of human-defined objectives. AI systems use machine- and human-based inputs to perceive environments, abstract perceptions into models through automated analysis, and use model inference to formulate options f or information or action. The definition includes systems using machine learning, large language models, natural language processing, computer vision technologies, and generative AI. Still, it excludes basic calculations, basic automation, or pre-recorded "if this, then that" response systems.

This plan applies to all new and existing AI systems developed, used, or procured by USAGM, which could directly impact the mission or security of the USAGM. It does not govern regulatory or other actions regarding non-agency uses of AI.

Strengthening AI Governance

Presently USAGM is in its initial stages of creating its overarching AI implementation strategy and thus plans to develop a strategy consistent with Executive Order 14110 and OMB's M-24-10.

As part of this effort USAGM will establish AI Governance Committees, develop AI Policy, develop AI Use Case inventories, and establish AI Budget and Implementation working groups, so that AI is part of the agency budget formulation and execution processes. USAGM leaders and AI POCs are contributing to plans for AI governance and adoption. This includes creating a clearance process for new AI tool ideas that bolsters, rather than deters, the responsible use of AI through proofs of concepts validating responsible use and real world value add scenarios. Additionally, USAGM is identifying critical workforce development focus areas in AI literacy and developing training programs, resources, for broadcast specific content in support of the journalistic needs for content creation, management and archiving. These training programs will enhance AI skills within the agency's existing workforce and cover several topics, from basic AI literacy to advanced machine learning techniques.

AI Governance Bodies

Establishing AI Governance Bodies within USAGM is a critical component of its commitment to ensuring AI technologies' responsible and ethical use. The agency is creating one overarching USAGM AI governance committee and two supporting working groups (one for AI policy development and one for budget formulation and implementation of AI use cases). These bodies are designed to oversee the implementation and operation of AI systems and ensure compliance with relevant laws, regulations, and internal policies.

Composition of AI Governance Bodies

The AI governance body at USAGM comprises representatives from our senior agency leadership including the Deputy CEO, USAGM's Chief AI Officer (CAIO), leadership of USAGM's entities, and various key offices performing mission support and broadcast content creation, ensuring a comprehensive and multidisciplinary approach to AI oversight. The offices represented include:

- Office of the Chief Executive Officer (OCEO)

- Office of Chief Information Officer (OCIO)

- Office of Technology, Services and Innovation (TSI)

- Office of Civil Rights and the Chief Diversity Officer

- Office of General Counsel (OGC)

- Office of Human Resources (OHR)

- Office of Risk Management (ORM)

- Office of Policy and Research (OPR)

- Office of Contracts

- Office of Chief Financial Officer

- Office of External Affairs

- Office of Security (SEC)

- Voice of America (VOA)

- Office of Cuba Broadcasting (OCB)

- Radio Free Europe/Radio Liberty (RFE/RL)

- Radio Free Asia (RFA)

- Middle East Broadcasting Networks (MBN)

- Office of Technology Freedom (OTF)

- Frontline Media Fund (FMF) and Global News Service (GNS)

Expected Outcomes

The AI governance body aims to achieve the following outcomes:

- **Ethical AI Deployment**: Ensure all AI systems are developed and deployed consistently with ethical standards and organizational values.

- **Risk Mitigation**: Identify and mitigate potential risks associated with AI, including biases, unfair outcomes, and other harms. Monitor USAGM compliance with Federal guidelines.

- **Transparency and Accountability**: Maintain transparency in AI operations and hold stakeholders accountable for their roles in AI governance.

- **Continuous Improvement**: Foster a culture of constant improvement in AI governance practices, keeping pace with technological advancements and emerging best practices.

Consultation with External Experts

The AI governance body will consult with external experts as appropriate and consistent with applicable laws to enhance the robustness of the agency's AI governance framework. These consultations may include:

- **International Media Organizations**: USAGM will consult and collaborate with members of the DG8 group of international public service media (*comprising France Médias Monde, Deutsche Welle, BBC World Service, USAGM, NHK World, CBC/Radio-Canada, ABC Australia, and Switzerland (Swissinfo)*).

- **Media Industry Leaders**: Engaging with US based commercial broadcasting and print media industry experts to gain insights into how they are applying cutting-edge AI technologies and practices, while maintaining appropriate control over their internal process.

- **Civil Society Organizations**: Consulting with NGOs and other civil society organizations to understand the societal impact of AI and incorporate diverse perspectives.

- **Interagency Collaboration**: Coordinating with other federal agencies to share knowledge and align on best practices for AI governance.

Operational Framework

The AI governance body will operate under a defined framework that includes regular meetings, a structured review process for AI projects, and transparent reporting lines to senior leadership. Key activities include:

- **Review and Approval**: Evaluating AI projects and use cases to ensure they meet ethical, legal, and policy requirements before deployment.

- **Monitoring and Oversight**: Continuously monitoring AI systems for compliance and performance, with mechanisms in place for regular reviews and audits.

- **Policy Development**: Developing and updating internal AI principles, guidelines, and policies to reflect the evolving AI landscape and regulatory requirements.

- **Stakeholder Engagement**: Ensuring active engagement with internal and external stakeholders to foster a collaborative approach to AI governance.

AI Use Case Inventories

The creation and maintenance of AI use case inventories are essential to ensuring that USAGM comprehensively understands how AI technologies are utilized across the agency. This inventory process allows us to manage AI deployments effectively, ensuring alignment

with the agency's ethical standards and regulatory requirements. USAGM will individually inventory each of its AI use cases at least annually for submission to OMB and will post a public version on the USAGM's website. For AI use cases that are not required to be individually inventoried, USAGM will still report and release aggregate metrics about such use cases.

Process for Soliciting and Collecting AI Use Cases

USAGM will establish a systematic process for soliciting and collecting AI use cases across all sub-agencies, components, and bureaus. This process includes:

- **Organization-wide Surveys**: Conducting periodic surveys to gather information about existing and proposed AI applications from various departments.

- **Idea Collection Sessions**: Organizing workshops and brainstorming sessions to encourage staff at all levels to submit AI use case ideas.

- **Technology Review Intake Process**: Integrating AI use case collection into the existing technology review process to capture new AI initiatives at the proposal stage.

- **Continuous Monitoring**: Implementing ongoing monitoring mechanisms to identify emerging AI use cases and update the inventory accordingly.

Ensuring Comprehensive and Complete Inventory

To ensure that the agency's AI use case inventory is comprehensive and complete, USAGM will employ several strategies:

- **Stakeholder Engagement**: Engaging with key stakeholders, including Chief Data Officers, Chief Information Officers, Chief Technology Officers, and program managers from all USAGM's federal and non-federal entities, to identify AI use cases.

- **Cross-functional Collaboration**: Collaborating across various departments to ensure all potential AI applications are captured and evaluated.

- **Documentation and Tracking**: Maintaining detailed documentation and track all AI use cases to ensure they are accurately represented in the inventory.

Criteria for Excluding Use Cases from Inventory

While USAGM aims to maintain a transparent inventory of AI use cases, certain use cases may be excluded based on specific criteria:

- **Mission Risk**: Use cases that, if disclosed, could negatively impact or create risks to the agency's mission, employees, customers, or the public.

- **Confidentiality Agreements**: Use cases subject to confidentiality agreements with other agencies, customers, employees, or stakeholders.

- **Security Concerns**: Use cases that involve PII sensitive or classified information that cannot be publicly disclosed.

Process for Periodic Review and Validation

USAGM is committed to periodically revisiting and validating the AI use cases in the agency's inventory to ensure accuracy and relevance. This process includes:

- **Quarterly Reviews**: Conducting quarterly reviews of the AI use case inventory to identify any changes or updates needed.

- **Validation Criteria**: Predefined criteria are used to reassess use cases and determine whether previously excluded cases should be included or whether any new cases meet the exclusion criteria.

- **Approval and Oversight**: The CAIO, AI governance body, and senior leadership should be involved in the review and validation process to ensure accountability and transparency.

Advancing Responsible AI Innovation

USAGM is committed to fostering an environment where AI technologies can be developed and deployed responsibly. Leveraging AI's potential to enhance agency operations and ensuring that such advancements align with ethical standards and regulatory requirements is one way of advancing responsible AI innovation.

AI Strategy

The development of a robust AI strategy is essential for USAGM to leverage artificial intelligence's full potential while ensuring alignment with the agency's mission, values, and regulatory requirements. This AI strategy will focus on integrating AI into the agency's operations responsibly and effectively, driving innovation, and managing associated risks.

AI Strategy Document

The Agency does not currently have an AI strategy. As part of the AI governance process, USAGM will create and publish a strategy document that addresses all required areas in Section 4.a of OMB Memo M-24-10 by March 2025. This document will:

- **Articulate the Vision**: Clearly articulate the agency's vision for AI and how it aligns with the agency's mission.

- **Detail the Goals and Pillars**: Provide detailed descriptions of the agency's strategic goals and the three main pillars of the AI strategy.

- **Outline the Implementation Plan**: Present the roadmap, resource allocation, stakeholder engagement strategies, and performance metrics for implementing the AI strategy.

- **Public Availability**: Make the AI strategy document publicly available on the agency's website to ensure transparency and accountability.

Vision and Goals

USAGM's AI strategy will be guided by a clear vision and specific goals that align with the agency's mission:

- **Vision**: Harness AI's transformative power to enhance operational efficiency, improve decision-making, and deliver better outcomes for the public.

- **Goals**:

  - **Innovation**: Foster a culture of innovation by integrating AI into critical areas of agency operations.

  - **Responsibility**: Ensure the ethical and responsible use of AI in all applications.

  - **Efficiency**: Improve operational efficiency and effectiveness through AI-driven solutions.

  - **Transparency**: Maintain transparency in AI development and deployment processes.

Strategic Pillars

The AI strategy of USAGM will be built on three main pillars, as outlined in OMB Memorandum M-24-10:

1. **Strengthening AI Governance**

   - **Governance Framework**: Establish a robust governance framework to oversee AI initiatives, ensuring compliance with ethical standards and regulatory requirements.

   - **AI Principles and Policies**: Develop and update internal AI principles, guidelines, and policies to guide the responsible use of AI.

   - **AI Governance Bodies**: Form AI governance bodies comprising representatives from key offices to provide oversight and ensure alignment with strategic goals.

2. **Advancing Responsible AI Innovation**

   - **Removing Barriers**: Identify and mitigate barriers to AI adoption, including technical, organizational, and regulatory challenges.

   - **Talent Development**: Invest in AI talent development through targeted recruitment, training programs, and career development opportunities.

   - **Collaboration and Sharing**: Promote collaboration and knowledge sharing within the agency and with external partners to drive AI innovation.

3. **Managing Risks from the Use of AI**

- **Risk Assessment**: Implement comprehensive risk assessment processes to identify and mitigate potential risks associated with AI applications.

- **Compliance Monitoring**: Establish mechanisms for continuously monitoring and auditing AI systems to ensure compliance with ethical standards and regulatory requirements.

- **Incident Response**: Develop and maintain incident response plans to promptly address any issues arising from AI deployments.

Implementation Plan

The successful implementation of USAGM's AI strategy requires a structured plan that includes the following components:

- **Roadmap Development**: Create a detailed roadmap outlining the key milestones, timelines, and responsibilities for implementing the AI strategy.

- **Resource Allocation**: Allocate the necessary resources, including budget, personnel, and technology, to support AI initiatives.

- **Stakeholder Engagement**: Engage with internal and external stakeholders, including employees, partners, and the public, to gather input and build support for AI initiatives.

- **Performance Metrics**: Establish performance metrics to measure AI initiatives' effectiveness and ensure they deliver the desired outcomes.

- **Workforce Development**: Conduct a workforce AI skill gap assessment and establish a workforce training program focusing on multiple goals such as raising AI literacy and supporting the journalistic mission for content creation using AI tools responsibly in the process of content creation.

Removing Barriers to the Responsible Use of AI

One of USAGM's primary goals is to identify how the agency may responsibly use AI. The USAGM AI working groups will undertake several initiatives to achieve this:

- **Barrier Identification**: Conduct comprehensive reviews to identify barriers to AI adoption, including issues related to data access, technical infrastructure, and organizational readiness.

- **Mitigation Strategies**: Develop and implement strategies to address these barriers, such as enhancing data governance and management frameworks, investing in AI infrastructure, and providing targeted staff training.

- **Resource Allocation**: Ensure necessary resources, including software tools, open-source libraries, and deployment and monitoring capabilities, support responsible AI use.

AI Talent

Building and maintaining a skilled AI workforce is crucial for advancing responsible AI innovation. As part of the AI governance process, USAGM will develop the following:

- **Recruitment Strategies**: Implementing targeted recruitment strategies to attract AI talent, including participating in AI-focused job fairs and conferences.

- **Internal Training Programs**: Developing comprehensive training programs to enhance AI skills within USAGM's existing workforce. These programs cover various topics, from basic AI literacy to advanced machine learning techniques.

- **AI Talent Lead**: Designating an AI Talent Lead within USAGM to oversee AI talent development initiatives and ensure they align with the agency's strategic goals.

AI Sharing and Collaboration

USAGM recognizes the importance of collaboration and knowledge sharing in advancing responsible AI innovation. USAGM's efforts in this area include:

- **Custom-Developed AI Code**: To the extent that USAGM develops any custom AI code the agency will ensure that the custom-developed AI code, including models and model weights, is shared consistent with Section 4(d) of M-24-10.

- **Incentivizing Sharing**: Encouraging the sharing of AI code, models, and data with the public and other agencies by providing incentives and support for such initiatives.

- **Coordination Efforts**: Coordinating with relevant offices within USAGM to facilitate sharing and collaboration, ensuring that best practices are disseminated and adopted across the organization.

Harmonization of AI Requirements

To ensure a consistent and unified approach to AI governance, innovation, and risk management, USAGM will take the following steps to harmonize AI requirements across the agency as part of the AI working groups:

- **Documentation of Best Practices**: Document and share best practices regarding AI governance, innovation, and risk management to ensure they are consistently applied.

- **Interagency Coordination**: Engage in interagency coordination efforts to align USAGM's AI strategies and policies with other federal agencies, promoting a coherent and collaborative approach to AI use.

- **Continuous Improvement**: USAGM continuously updates its AI practices and policies to reflect emerging trends, technological advancements, and evolving regulatory requirements.

Managing Risks from the Use of Artificial Intelligence

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

To ensure the responsible deployment of AI, USAGM through the AI governance will establish a rigorous process for determining which AI use cases are considered safety-impacting or rights-impacting:

- **Review Process**: Each current and planned AI use case will undergo a thorough review to assess whether it matches the definitions of safety-impacting or rights-impacting AI defined in Section 6 of OMB Memorandum M-24-10.

- **Criteria for Assessment**: USAGM's assessment criteria include the potential for physical harm, the impact on civil rights, and the degree of automation in decision-making processes.

- **Supplementary Criteria**: USAGM may develop additional criteria tailored to its specific journalistic mission to guide safety and rights-impacting AI decisions.

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

Implementing effective risk management practices is essential to mitigate the risks associated with AI. As part of USAGM AI governance the agency will establish the following:

- **Comprehensive Risk Assessments**: Conduct comprehensive risk assessments for all AI applications, identifying potential hazards, vulnerabilities, and impact on stakeholders.

- **Minimum Risk Management Practices**: Document and validate the implementation of minimum risk management practices, including data privacy, security measures, and ethical considerations.

- **Risk Management Framework**: Develop and maintain a risk management framework that outlines the procedures for identifying, assessing, mitigating, and monitoring risks throughout the AI lifecycle.

Any existing non-compliant AI technology discovered through the agency's AI working group efforts will be terminated and removed.

Minimum Risk Management Practices

In certain circumstances, it may be necessary to issue waivers for one or more of the minimum risk management practices. As part of the USAGM AI working group's efforts, the agency will establish a straightforward process for the following:

- **Criteria for Waivers**: Develop criteria to guide the decision to waive risk management practices, ensuring that waivers are granted only when necessary and justified under the framework contained within OMB M-24-10.

- **Issuance and Revocation**: Establish procedures for issuing, denying, revoking, tracking, and certifying waivers, with oversight from the CAIO and the AI governance body.

- **Documentation and Transparency**: Maintain detailed records of all waiver decisions to ensure transparency and accountability and provide reporting on such decisions to OMB.

Implementation of Risk Management Practices

Ensuring the effective implementation of risk management practices is crucial to safeguarding against potential harms from AI. As part of the USAGM AI working group efforts, the agency plans to implement:

- **Preventive Controls**: Put in place preventive controls to ensure that non-compliant safety-impacting or rights-impacting AI systems are not deployed to the public.

- **Testing and Independent Evaluation**: Conduct adequate testing to ensure the AI, and components that rely on it, will work in its intended real-word context. Review and document completed impact assessment and results from testing AI performance in real-work context.

- **Monitoring and Auditing**: Implement continuous monitoring and auditing mechanisms to ensure ongoing compliance with risk management practices and promptly detect deviations to minimize the risk of significant harm.

- **Termination Procedures**: Develop clear procedures for terminating non-compliant AI systems, including notification of the system stakeholders, planning to minimize the impact on workforce, planning for any remediation steps necessary to contain agency data leakage or potential agency reputation damage caused by the non-compliant AI system and followed by timely deactivation of the non-compliant AI system.

Incident Response and Redress Protocols

Preparedness for potential incidents involving AI is vital to managing risks effectively. As part of the USAGM AI working group efforts, the agency plans to implement:

- **Incident Response Plans**: Develop and maintain incident response plans tailored explicitly for AI systems, outlining the roles and responsibilities, communication protocols, and remediation actions.

- **Redress Mechanisms**: Establish mechanisms for redress to address any harms caused by AI systems, ensuring that affected individuals or entities can report issues and seek resolution.

- **Continuous Improvement**: Regularly review and update incident response and redress protocols based on lessons learned from past incidents and emerging best practices.

Appendix A: Terms and Definitions

Ref. OMB Memorandum M-24-10 for definitions

U.S. AGENCY FOR
GLOBAL MEDIA

VOA
VOICE OF AMERICA ®

RadioFreeEurope
RadioLiberty

Office of
Cuba Broadcasting

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