

U.S. Department of the Interior

Compliance Plan for OMB Memoranda M-24-10

September 2024

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1. Strengthening AI Governance

1.1 General

The Department of the Interior (The Department; Interior; or DOI) is committed to establishing an open, innovative approach to expanding the safe, secure, and responsible use of Artificial Intelligence (AI), consistent with the principles laid out in [EO 14110](#) on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence and [with OMB Memorandum M-24-10](#). The Department previously provided guidelines on Risk Managed Use of Generative AI (August 2023); these guidelines will remain in effect as the Department refines additional guidance in alignment with M-24-10. The Department does not have existing policies or guidelines regarding the use of other forms of AI, including machine and deep learning applications. To date, Interior does not have any safety or rights impacting use cases. As the Department's AI maturity continues to develop, Interior, through the leadership of the Chief Artificial Intelligence Officer (CAIO), will consistently review guidelines, policy, and principles and update as needed to ensure the application of AI tools enhance our mission and serve the American people.

1.2 AI Governance Bodies

The Department of the Interior's Management Initiatives Team (MIT) Executive Council serves as the Department's AI Governance Board. The Board is chaired by the Deputy Secretary (Acting) and Vice-Chaired by the CAIO. Offices represented on the Board include: Solicitor; Assistant Secretary – Fish, Wildlife and Parks; Assistant Secretary – Water and Science; Assistant Secretary – Indian Affairs; Assistant Secretary – Land and Minerals Management; Assistant Secretary – Policy, Management and Budget; Office of the Chief Information Officer (including the Chief Information Officer (CIO) / Privacy Official and Chief Data Officer), and Office of Diversity, Inclusion and Civil Rights.

The AI Governance Board will carry out Interior's regulatory responsibilities related to AI including how to incorporate transparency with partners; integrate Indigenous Knowledge into systems and models; the importance of accurate, relevant data – and the public's perception of the accuracy of that data – to inform decision-making; and how to support the Department's workforce and our partners. At the initial meeting in May 2024, the Governance Board agreed to remain coordinated on implementation activities and create an approach that ensures appropriate structure is in place to govern AI while encouraging innovation. The Department will look to partner with the federal family, academia, and Congress on best practices and sharing knowledge.

In addition to the AI Governance Board, the MIT has chartered a sub-group representing Interior's Bureaus and relevant operations portfolios, including science, information management and technology, human capital, budget, public safety and emergency management, the Office of Diversity, Inclusion and Civil Rights, and the Solicitor. The sub-group will guide the development of AI policies, establish best practices, consult external experts as

needed, and serve as a venue to exchange information to enable coordination of research, development, and deployment of use cases.

The Department is committed to taking an open and transparent approach to accelerating the responsible use of AI by consulting with external experts and stakeholders, as appropriate, to enhance the development and use of AI tools. DOI will continue to work with research partners across the government and in academic institutions to develop AI-enabled tools that enhance Interior's science and research mission areas. Additionally, the Department is actively collaborating with other Federal agencies to develop tools to increase efficiencies in processes, including ongoing initiatives to enhance processing of public comments, environmental assessments, and reduce burdens in grant reporting.

1.3 AI Use Case Inventories

Interior has launched an AI use case collection and intake process to allow all employees to submit potential uses of AI. The application is integrated with the review and approval processes: the AI use case system will track AI use cases through the entirety of the AI lifecycle, from conception to production to retirement.

To ensure the Department's AI inventory is comprehensive, accurate, complete and encompasses updates to existing use cases, the AI use case inventory will be verified against additional knowledge maintained by the Office of the Chief Information Officer (OCIO) and the Chief Data Officer. Bureau and Office Directors will be held accountable for the accuracy and completeness of the AI Inventory. Any discovered or reported use of covered AI by the Department that is not included in the AI Inventory will be stopped until all necessary reviews and approvals have been completed.

1.4 Reporting on AI Use Cases Not Subject to Inventory

The Department anticipates limited use cases will meet the exclusion criteria based upon current mission objectives. However, the AI use case intake process will be the same for use cases that may be excluded from being individually inventoried. If, in consultation with the AI Governance Board, the CAIO determines that a use case meets the requirements for exclusion, the information will not be reported on the public DOI use case inventory. The Department will still have record and tracking of these exceptions and will perform periodic audits to ensure that the designations are still valid.

The CAIO and AI Governance Board will review new use cases on a routine basis. If any use case potentially meets the criteria for exclusions from the public inventory, additional information will be collected from the requestor and the Board will determine if the criteria are met and if the use case should be excluded. The CAIO will review the inventory of existing use cases at least annually to determine if those already reviewed should be brought to the AI Board's attention for further consideration.

2. Advancing Responsible AI Innovation

2.1 Removing Barriers to the Responsible Use of AI

To adopt responsible AI, the Department must utilize data of documented quality and ensure equitable access to tools and data.

Findable, Accessible, Interoperable, and Reusable (FAIR) Data

Interior will continue to implement the Department's Data Strategy expressed as Goal 5 in the Department's [Information Management and Technology Strategic Plan, 2024-2029](#), to "create a data-centric ecosystem that allows the DOI workforce, people, community, organizations, and the public appropriate access to data on our land, water, cultural, and natural resources." The Data Strategy highlights that "establishing Findable, Accessible, Interoperable, and Reusable (FAIR) and OPEN data as a strategic asset for DOI will enable reliable and traceable AI solutions." The Data Strategy also calls on DOI to "strengthen data protection and support evidence-based decisions through data analytics, artificial intelligence, and data science to increase transparency, improve government operations, and build public trust." Achieving this goal will provide a foundation of high-quality data that can be used for development, training, and use of AI tools by Interior and external partners. DOI will continue to align resources to improving the management and stewardship of priority data assets necessary to inform evidence-based decisions.

Equitable Access

A critical challenge in Interior's adoption of AI is overcoming barriers such as access to high-performance computing and network bandwidth for remote users to have responsive access to AI tools and the underlying data. The Department is mitigating the bandwidth challenges through its Zero Trust architecture program - remote offices and field stations can increase their bandwidth securely at lower costs through commodity internet. The Department is also exploring partnerships with federal agencies such as the National Science Foundation, the Department of Energy and the National Oceanic and Atmospheric Administration (NOAA) to access their existing high performance computing infrastructures.

As Interior expands adoption of AI-enabled tools, the Department will continue to remove barriers to ensure necessary IT infrastructure, reliable data, and training is available. This will be accomplished by working together across Bureaus and Offices to identify efficiencies, share knowledge, leverage existing tools, support training, and provide access to AI resources which meet the dynamic needs and expectations of the federal community in a rapidly evolving market. Interior is securely making both open source and commercial AI resources available to everyone across the Department through offering open and equitable access to AI tools and training. In doing so, DOI is advancing and promoting opportunities for all employees to benefit from the use of AI. The CAIO, in partnership with the Office of Human Capital and DOI's expanding evidence and science communities, will continue to promote and develop a culture of learning.

Access to tools

Interior provides multiple avenues for staff to securely access open source and commercial off-the-shelf software and the computing resources necessary to safely harness the power of AI. DOI has test and development environments on the major commercial cloud platforms for staff to experiment with AI technology. In addition, the U.S. Geological Survey (USGS) maintains a high-performance computing environment and a team of AI practitioners who assist USGS scientists in using the environment. The OCIO is safely deploying Fedramp approved Generative AI in internal applications in collaboration with mission partners. In addition, the CIO's office is establishing a hands-on Generative AI training program to share knowledge and build capacity across the Department. These applications, and the code that supports them, are subjected to the same enterprise privacy, security, and monitoring as other applications in DOI's enterprise cloud environment. Data and access controls to these applications, when applicable, leverage Interior's existing access and identity systems.

In August 2024, the OCIO issued guidelines on Risk Managed Use of Generative AI for the Department, which set forth how to use generative AI tools in the workplace safely and securely. Interior is currently developing internal reference guides for the use of generative AI to expand and refine this initial guidance. The reference guides will allow Bureaus and Offices flexibility to experiment and innovate new AI applications while continuing to leverage existing enterprise role-based security and privacy practices. As Interior's AI maturity increases, additional guidelines or policies may be developed. Additionally, some components of Interior may choose to provide additional guidance regarding the use of generative AI such as in external communications, scientific integrity, and human resources. The Department has also provided access to "DOI ChatGPT" a pre-trained commercial large language model that provides the necessary security and controls to protect DOI data from traveling over the public internet and is not retained or used to train commercial AI products.

2.2 AI Talent

A diverse AI-ready workforce – through both training of current employees and the hiring of an AI-enabling workforce – is essential for the long-term implementation of AI across Interior.

On March 15, 2024, the Department of Interior issued Personnel Bulletin 24-02, authorizing the use of the Direct Hiring Authority and Schedule A hiring authority for positions with major duties and responsibilities supporting the integration of AI. This includes positions in the occupations of Information Technology Specialist, Computer Scientist, Computer Engineer, and Management and Program Analyst. The different Bureaus and Offices of the Department are currently implementing different recruitment strategies for the development of AI programs. There are plans to recruit AI positions in upcoming hiring events "Back to Business Career Fair hosted by the VA", "Military Spouse Cyber Workforce Virtual Hiring Fair", and "Historically Black College and Universities (HBCU) Week Career Fair and Hiring Event".

The Department launched the “DOI ChatGPT” program to keep developing the DOI workforce into one that is “AI-ready.” Showing support for the use of AI spurs greater interest from the Interior workforce in the development of AI tools, and more employees are interested in AI-related positions.

Additionally, the Department will implement comprehensive skill development and other training programs aimed at equipping employees with the expertise and knowledge needed to leverage AI ethically and effectively. Training will support employees in developing an AI competency that includes knowledge of available tools, understanding the role of quality data, responsible use of AI, and mitigation for anticipated risks associated with AI tools, including bias. To date, the Department has made over 500 AI focused trainings available to the workforce to assist in building skills related to the future needs of the Department.

Interior, through DOI University, has developed an AI Framework for upskilling the workforce. The first Foundational level courses were rolled out in July 2024 and included participants from both DOI and other Federal agencies. This training supports employees in developing an AI competency that includes knowledge of available tools, understanding the role of quality data, responsible use of AI, and mitigation for anticipated risks associated with AI tools, including bias. Additional courses will be added in Fiscal Year 2025 (FY25) that continue to build on more advanced AI topics, allowing different kinds of AI users the ability to adapt to this rapidly evolving issue area. Information about external AI training resources is also promoted to employees, such as those offered by the Office of Personnel Management (OPM) and the Senior Executive Service (SES) AI Leadership Program sponsored by the Partnership for Public Service.

The Department will also continue to support employee-driven knowledge sharing through communities of practice, providing venues for sharing and discussion, and providing access to information on the Department’s use of AI. To date, there have been efforts through the Interior Training Directors Council (ITDC) to build awareness around the topic and the importance for the training community to be actively involved in leading workforce upskilling. The Department also has an active group of over 630 individuals who come together through MS Teams to share information about AI trainings, safety, machine learning and data analysis, and Generative AI prompts and use cases. In FY25, the Department will look to leverage the expertise of this growing AI community to host regular learning events such as brown bag sessions to share expertise more broadly across the Department’s workforce.

2.3 AI Sharing and Collaboration

The Department continues to support transparency and collaboration and serves as a leader in the sharing of open data and open code, inclusive of code used to develop government funded AI. Open data used to train AI models and applications will be shared through the Department’s Enterprise Data Inventory and be made available and accessible to the public.

The Department’s CDO and CIO will continue efforts to incentivize the publication and documentation of open data and open code through the respective governance boards and

reiterate existing policies related to open data and open code with regards to AI. The CDO and CIO, in messaging the value of open data and open code, will continue to highlight the benefits to enabling mission outcomes, including opportunities to increase mission efficiency and effectiveness, and improving transparency. Additionally, The Department also remains committed to the philosophy and practice of Open Science through the leadership of USGS Director and Science Advisors. A key component of open science is making sure the scientific results are valid and reproducible, enabled by sharing the underlying methods, data and code.

The DOI GitHub Enterprise Community (DGEC) provides a central environment where DOI developers, technologists, and data scientists can develop, interact with contributors and collaborators, and safely store, share, and access software code and projects. The DGEC environment fosters a ‘community first’ philosophy by focusing on mission enablement (e.g., cost avoidance, increased velocity, quality, and risk management) through exceptional customer service values. This platform will be used to document and share code used in the development and deployment of AI across the Department.

DOI is also planning to launch an internal Department-wide AI seminar series highlighting innovative applications of AI aligned to key mission objectives. These seminars will provide opportunities for employees to show case positive examples of the responsible uses of AI across mission areas while educating the workforce on new and exciting possibilities for applying AI. Through this series, Interior hopes to incentivize knowledge sharing and best practices by lifting up and acknowledging the innovative AI use cases happening across the entirety of the organization.

2.4 Harmonization of AI Requirements

Interior’s AI Governance Board, MIT, and AI Sub-Group includes representatives from across the Department to ensure consistency and foster sharing and collaboration in development of Department-wide policies and guidelines. The CAIO will collaborate with other executive leaders to leverage their statutory and executive authorities to the extent possible to manage risk associated with AI. Existing management bodies and governance boards for components impacted by AI will work with the AI Sub-group to review and make recommendations to update existing policies to account for any gaps or additional policies that are needed. For example, the CIO will ensure that CIO authorities and existing Departmental policies with regards to cybersecurity, privacy, IT procurement, records management, and IT management apply to AI use cases.

The Department has also established an internal employee resource webpage to provide centralized access to policies, guidelines, tools, and training opportunities that are available. A “Frequently Asked Questions” section (in development) will include additional information regarding AI, including on governance and risk management practices. The webpage also provides links to the Department’s AI use case inventory and is an opportunity to “spotlight” use cases across DOI. The website provides links to join Interior’s AI Community of Practice and an email address for employees to submit questions or suggestions to the Department’s AI

team, which includes staff from the Office of the Chief Information Officer; Policy, Management, and Budget; and the Office of Communications.

3. Managing Risks From the Use of AI

Understanding how, where and when AI may potentially impact our employees and the American public's safety and liberties is foundational for managing and mitigating the risks associated with potential AI usage across the Department.

To date, Interior has not implemented any AI use case that are considered rights or safety impacting. The Department is committed to have the proper safeguards in place to evaluate its AI use cases and existing applications of AI to mitigate risks to safety and rights impacting AI moving forward.

3.1 Determining Which AI Is Presumed to Be Safety-Impacting or Rights-Impacting

Each potential AI use case, based on information gathered through the Department's use case intake process, is reviewed with the core values and principles of safety, and protecting civil rights and civil liberties in mind. Currently, a small group of subject matter experts – including the Chief Data Officer and attorneys from the Solicitor's Office – review use cases consistent with the definitions of "safety-impacting AI" or "rights-impacting AI" as defined in Section 6 of Executive Order 14110.

As the Department's AI maturity increases, and more use cases are developed and implemented, Interior will implement a more systematic approach to review use cases: AI uses cases will be tracked via the intake system and regularly reviewed for changes to the risk profile. If DOI identifies a use case as potentially being safety or rights impacting AI, the CAIO or the MIT AI sub-group will collect sufficient information to determine if the use case fits the definitions in Section 6. For any use-case that fits definitions in Section 6, the CAIO, in consultation with the AI Governance Board, will determine if the use case should proceed or should be terminated. For those safety or rights impacting use cases that are approved to proceed, the Department will require at least the minimum risk management practices prescribed in M-24-10 Section 5 (C) iv.

The CAIO and AI Governance Board will review Federal requirements and standards for AI, including those set by other Federal agencies, to guide risk identification, analysis, and required risk management actions. In addition, in conjunction with the Department's enterprise risk management (ERM) activities, consultations with relevant community members to ensure safety and rights-related risks are identified, documented, and incorporated into the review process for AI use cases.

The AI Subgroup, in coordination with the Enterprise Risk Management team, will establish protocols for assess the likelihood a proposed use case will be safety and/or rights impacting. The AI Governance Board will routinely review the status of the AI use cases from the inventory and, if necessary, require additional information on any use case to determine potential risk prior to approving the use case for production.

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

The AI use case inventory will be regularly reviewed, with ongoing assessment and monitoring for use cases that meet the criteria for being safety and/or rights impacting. In ensuring the completeness of the use case inventory through monitoring of additional knowledge bases, the OCIO and Chief Data Officer will identify use cases in production that have not been reviewed via the intake process and/or have been deemed non-compliant.

The Department will establish low tolerance for failure to comply with mandated risk management practices. Within programs, leaders will be accountable for ensuring AI uses meet minimum established requirements and risk management practices, if necessary. Non-compliance will result in immediate suspension of the affected activity and immediate deployment of corrective action plans. Departmental policies will be established addressing violations.

An additional mechanism for ensuring that non-compliant AI is not utilized by the Department is through robust communication and training available to all employees. The CAIO, in coordination with the AI Governance Board, will identify key messages and training needs related to AI as a tool, AI risks, complying with AI policies, and potential consequences to the public, the Government, the Department, and personally. These key messages and trainings will be shared with employees through existing internal communications channels, including the AI employee resource website, AI community of practices, and learning sessions.

3.3 Minimum Risk Management Practices

No later than December 1, 2024, the Department will issue guidance that all safety and or rights impacting AI must adhere to the risk management practices required in M-24-10 Section 5. The guidance or other management controls will also describe the Department's plans to document and validate the implementation of these minimum risk management practices.

Additionally, AI risk has been identified as a mandatory element in the Department's approach to Enterprise Risk Management (ERM) program, and – as such – will be integrated into Interior's risk register. AI risk will be managed through established protocols and at all appropriate levels within the Department and periodically reviewed by a senior level risk management council. The risk management council will ensure accountability, across all levels of the Department, in ensuring risks related to AI are known, quantified, reduced to acceptable levels, and prioritized in decision-making.