

Artificial Intelligence (AI) Governance—An Imperative for Future Success

Helping Federal Agencies Navigate OMB M-24-10



Generative AI is making waves in the Federal government, helping agencies optimize operations and improve service delivery. How can government agencies effectively integrate Gen AI to enhance efficiency while maintaining robust governance, transparency, and public trust?

The release of the Office of Management and Budget (OMB) Memorandum M-24-10 outlines new requirements for AI governance, innovation, and risk management within Federal Government agencies. The memorandum emphasizes the need to manage AI risks while promoting innovation, ensuring transparency, and engaging the public.

Key Requirements



Al Governance Enhancement

Agencies are instructed to strengthen Al governance frameworks by appointing a Chief Al Officer (CAIO) who will ensure comprehensive oversight of Al applications across different departments. This includes convening Al governance bodies and maintaining an inventory of Al use cases.



Responsible Al Innovation and Risk Management:

Agencies are encouraged to adopt AI technologies, including generative AI, responsibly to improve operations and service delivery while managing the associated risks.



Actions and Deadlines

Agencies have specific actions to work towards, such as developing Al strategies, submitting compliance plans, and ceasing the use of non-compliant Al by December 1, 2024, unless an exception is granted.



Public Engagement

Agencies are required to publicly release Al use case inventories, strategies, and seek public feedback—emphasizing the importance of transparency and public involvement.

Implementation Timeline

As part of the guidance, the OMB required agencies to meet certain deadlines and criteria—some at very rapid paces.

OMB M-24-10 Requirements Implementation Timeline

2024

May 27 (within 60 days)

- Designate a Chief Al Officer (CAIO)
- Convene Al Governance Bodies

September 24 (within 180 days)

Submit a Compliance Plan to OMB or determination that agency will not use covered AI (and every two years until 2036)

October 15

Minimum practice extension request due

December 1 📿



- Implement the minimum practices for safety and rights impacting AI or stop using any AI in their operations
- Certify the ongoing validity of prior determination or waiver for use of Al (annually)

2025

March & (within 365 days and/or annually)

- Submit Inventory of each AI use cases to OMB and post on the agency's website annually
- Within 365 days develop and release on the agency's website a strategy for identifying/ removing barriers to responsible use of Al
- Publicly release an expanded Al use case inventory and report metrics on use cases not included in public inventories
- Conduct periodic risk reviews of any safety-impacting and right-impacting Al in use annually and after significant modifications.

Legend:



Recurring activity

On an ongoing basis, share and release Al code, modes, and data assets, as appropriate, and report to OMB any determinations made or waivers granted.

The Path to Gen Al Implementation

OMB M-24-10 aims to create a robust governance and risk management framework for Al. Without the compliance in place, Federal agencies open the door for unethical uses of Al systems, exacerbating biases, and perpetuating inquiries, ultimately eroding public trust. Moreover, insufficient oversight and fragmented efforts would hinder innovation, resulting in missed opportunities to modernize and enhance public services.

Now that the major deadlines have passed, what steps can agencies take to remain compliant? To help strengthen their Al governance structures and comply with OMB M-24-10 requirements, Federal agencies should consider:

Strengthening Al Governance:

Establish Al governance boards, develop policies and procedures, and participate in training programs.

Managing Risks from Al Use:

Perform AI impact assessments that are aligned with risk mitigation strategies and monitor AI systems for emerging risks.

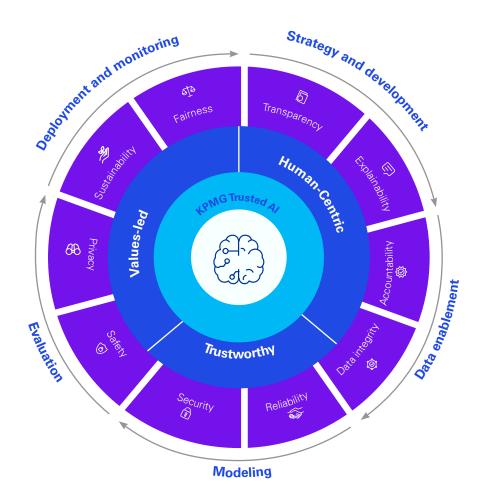
Advancing Responsible Al Innovation:

Develop innovative strategies, creating compliance plans, and establishing governance structures.

Our Firm's Trusted Al Framework Accelerates the Value of Al with Confidence

The KPMG Trusted AI framework is designed to help Federal agencies deploy and manage the use of AI in a trustworthy and ethical manner, focusing on strategy, data enablement, evaluation, deployment, monitoring, and the management of emerging risks. Leveraging our comprehensive framework and KPMG professional's knowledge in regulation, risk, security, and privacy, we come ready with a toolkit of human-centric services to expedite government agencies' trustworthy AI journey. As shown below, the KPMG Trusted AI Framework can help agencies implement structured AI governance and risk management practices more efficiently, as well as remain compliant with guidelines set in OMB Memorandum M-24-10.

Examples of our services include:





Strategy and development

Guiding agencies on Al governance board setup, talent acquisition strategies, and compliance plans.



Data enablement & Modelling

Supporting IT infrastructure access, cybersecurity, and collaborative sharing of Al data and models.



Evaluation

Conducting Al impact assessments and ensuring ethical standards are met.



Deployment and monitoring

Piloting Al solutions, verifying performance, and incorporating risk mitigation techniques.

Contact us

For more information on how KPMG LLP can assist your agency in navigating OMB M-24-10 requirements, please contact:



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