

GUIDANCE ON 2025 AGENCY ARTIFICIAL INTELLIGENCE REPORTING

The Advancing American AI Act,¹ Executive Order (EO) 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government*,² and Office of Management and Budget (OMB) Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*,³ require Federal agencies⁴ to report on their use of artificial intelligence (AI). With limited exceptions, agencies must conduct an annual inventory of their AI use cases, report consolidated information on certain widely used commercial AI, and provide information about waivers granted under Section 4 of the appendix to OMB Memorandum M-25-21.

1. INVENTORY OF ARTIFICIAL INTELLIGENCE USE CASES

Federal agencies are required to conduct an annual inventory of their AI use cases. The Director of the OMB is charged with issuing instructions to agencies for the collection, reporting, and publication of information about agency AI use.

a. Agency Inventory Reporting to OMB

To streamline agency AI data calls, OMB has established two categories of reporting: Consolidated AI Use Case Reporting and Individually-Reported AI Use Cases.

- i. Consolidated AI Use Case Reporting: As AI solutions become more ubiquitous in agency enterprises and commercial software, it is impracticable to require individualized reporting for all instances of AI that rely on commercial-off-the-shelf products or services. However, to fulfill statutory obligations, these use cases cannot be omitted entirely from agency reporting and agencies must still annually certify the existence of such use cases to OMB and the public.

By December 22, 2025, each agency (except for the Department of Defense and elements of the Intelligence Community), must certify use of any AI use cases listed in this section to OMB by completing a form at <https://collect.omb.gov/site/212/home-page>. Note that agencies must still individually-report any use case that is determined to be high-impact, as defined in Section 5 of the appendix to OMB Memorandum M-25-21.

¹ Pub. L. No. 117-263, div. G, title LXXII, subtitle B, §§ 7224(a), 7224(d)(1)(B), and 7225 (40 U.S.C. 11301 note), <https://www.congress.gov/117/plaws/publ263/PLAW-117publ263.pdf>.

² Executive Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government* (Dec. 3, 2020), <https://www.federalregister.gov/documents/2020/12/08/2020-27065/promoting-the-use-of-trustworthy-artificial-intelligence-in-the-federal-government>.

³ OMB Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust* (Apr. 3, 2025), <https://www.whitehouse.gov/wp-content/uploads/2025/02/M-25-21-Accelerating-Federal-Use-of-AI-through-Innovation-Governance-and-Public-Trust.pdf>.

⁴ The term “agency” is defined in 44 U.S.C. § 3502(1); see Advancing American AI Act, § 7223(1).

Below is a list of widely used AI use cases that may be reported collectively in an agency's AI use case inventory. If a use case is present across many different offices, agencies can report it once, so long as it meets the criteria below:

- a. Scheduling internal-to-government meetings or appointments or setting reminders using AI.
 - b. Logging and analyzing time spent on tasks using AI-powered time management tools.
 - c. Transcribing, summarizing, or other efforts that improve the accessibility of a virtual meeting or interview using AI.
 - d. Prioritizing and categorizing incoming emails using AI.
 - e. Editing images, videos, or other public affairs materials using AI.
 - f. Scheduling and managing social media posts using AI.
 - g. Generating first drafts of documents, briefing, or communication materials using AI.
 - h. Improving the quality of written communications using AI tools.
 - i. Summarizing the key points of a lengthy report using AI.
 - j. Creating visual representations of data sets for reports or presentations using AI.
 - k. Using AI-assisted tools in word processors.
 - l. Generating code using AI.
 - m. Searching for agency information using a knowledge retrieval system.
 - n. Identifying and cataloging items in a storage room using AI-driven image recognition.
 - o. Managing or implementing security controls for information systems (e.g., cybersecurity) using AI.
 - p. Managing and prioritizing internal service or help desk tickets using AI.
 - q. Curating news articles and updates based on user preferences using AI.
 - r. Planning travel routes using AI-driven map applications.
 - s. Finding and booking travel accommodations using AI-powered platforms.
 - t. Unlocking smartphones or other devices without the need for passwords or PINs using AI-based facial recognition technology.
- ii. Individually-Reported AI Use Cases: By **December 22, 2025**, each agency (except for the Department of Defense and elements of the Intelligence Community), must submit an inventory of its AI use cases to OMB at <https://collect.omb.gov/site/212/home-page>.

Agencies must inventory all AI use cases in pre-deployment,⁵ pilot,⁶ deployed,⁷ or retired⁸ status regardless of whether they are implemented using standalone AI capabilities or AI that is embedded within other systems or applications. Additionally, agencies must inventory use cases regardless of whether the AI was developed or procured by the agency or developed or procured by a third party for the agency.

⁵ An AI use case is considered in pre-deployment status if it is in the development or acquisition stage.

⁶ A pilot use case has been deployed in a limited test or pilot capacity. For further context, refer to Section 4(a)(ii) of the appendix to OMB Memorandum M-25-21.

⁷ An AI use case is considered operational if it is being actively authorized or utilized to support the functions or mission of an agency.

⁸ The use case was reported in the agency's prior year's inventory, but its development and/or use has since been discontinued. Retired use cases must be reported as such in one consecutive inventory following the year in which it was operational. These use cases can be omitted from future year reporting; however, the unique use case identifier must not be repeated.

When unsure whether to report a use case, agencies should err on the side of inclusion, except for the exclusions set forth below. OMB will work with agencies to review agency submissions in line with OMB's required data fields. Section 5 of this document lists all potential data fields that a particular AI use case may be subject to.

- iii. **Excluded AI Use Cases:** Agencies must inventory all AI use cases, except for:
 - a. AI when it is being used either as a component of a National Security System or within the Intelligence Community; and
 - b. AI when it is being used to carry out basic research or applied research; however, agencies must still inventory any use cases where the purpose of such research is to develop particular AI applications for agency use, where the AI is currently being used to control or significantly influence a decision or outcome about individuals, or where the AI has an approved agreement for transition into agency operations.

Additionally, agencies may remove use cases reported in prior years' submissions that no longer meet the inclusion criteria.

b. Public-Facing Agency Inventory Reporting

In addition to the requirement in Section 1(a) to report to OMB, by **January 28, 2026**, each agency (except for the Department of Defense and elements of the Intelligence Community), must also post a consolidated, machine-readable CSV of all publicly releasable use cases from Section 1(a)(ii) of this document, as well as the list of consolidated AI use cases from Section 1(a)(i) of this document, on their agency's website at [agency.gov]/ai.

Agencies are encouraged to update their public inventories on an ongoing basis to reflect their current use of AI. Further, agencies must update their inventory, as appropriate, after December 2, 2025 to reflect necessary compliance with the April 3, 2026 deadline to implement risk management practices for high-impact AI use cases in OMB Memorandum M-25-21.

- i. **AI Use Cases That Can Be Withheld from Public Reporting:** Agencies are permitted to remove any use case from their public inventory whose sharing would be inconsistent with applicable law and governmentwide policy, such as the exemptions from public disclosure provided in 5 U.S.C. § 552. Where particular details of a use case cannot be shared or released publicly, agencies must only exclude those details, while including any fields that can be shared or released. The fact that a use case is not public-facing is not an adequate justification for withholding it from public sharing, nor is a desire to conceal inefficiency, violations of law, or administrative error, or to prevent embarrassment to an organization or agency.

In their public inventories, agencies may also remove the "Use Case ID" column, and replace the "Email Address" column with an email address designated for public inquiries.

- ii. **Responses Accessible to the General Public:** To ensure readability and transparency of agencies use case inventories to the public, agencies are directed to use plain language responses, where appropriate. As part of their efforts to use plain language, agencies should avoid or minimize the use of acronyms, and should define any acronyms when first used.

c. Agencies Not Using AI

If an agency does not utilize AI, it must notify OMB by sending an email to OFCIO_AI@omb.eop.gov and post a notice at [agency.gov]/ai with a statement indicating no current use of AI technology. Notices should be posted in HTML format.

2. REPORTING ON WAIVERS FROM SECTION 4 OF THE APPENDIX TO OMB MEMORANDUM M-25-21

The following guidance provides the mechanisms for Federal agencies to report on any waivers granted under Section 4(a)(ii) of the appendix to OMB Memorandum M-25-21.

In coordination with other relevant officials, an agency Chief AI Officer (CAIO) may waive one or more of the minimum risk management practices in Section 4(b) of the appendix to OMB Memorandum M-25-21 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, may also revoke a previously issued waiver at any time.

a. Reporting on Waivers

Within 30 days of granting or revoking a waiver, agency CAIOs must report this to OMB by completing a form at <https://collect.omb.gov/site/212/home-page> for the waived use case.

By **April 3, 2026**, agencies must also make a summary of each waiver and its corresponding justification publicly available on their websites at [agency.gov]/ai. If there are instances where an agency CAIO has issued a waiver for a use case that is withheld from public reporting, agencies must still publicly report the total number of use cases for which there is at least one waived risk management requirement and the total number of waived risk management requirements for each use case.

3. DEFINITIONS

Artificial Intelligence (AI): Agencies shall apply the definition of AI provided in Section 238(g) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019⁹ and refer to the technical context provided in Section 5 of the appendix to OMB Memorandum M-25-21 to further guide interpretation of that definition.

AI Use Case: For the purposes of this inventory, an AI use case refers to the specific scenario in which AI is designed, developed, procured, or used to advance the execution of agencies' missions and their delivery of programs and services, enhance decision making, or provide the public with a particular benefit.

⁹ Pub. L. No. 115-232, § 238(g), <https://www.govinfo.gov/content/pkg/PLAW-115publ232/pdf/PLAW-115publ232.pdf>.

4. CONSOLIDATED TABLE OF ACTIONS

<i>Responsible Entity</i>	<i>Action</i>	<i>Section</i>	<i>Deadline</i>
Each Agency**	Submit an inventory of AI use cases to OMB, to include individually-reported AI use cases and collective reporting on agency use of certain widely used commercial AI	1(a)(i), 1(a)(ii)	December 22, 2025
Each Agency**	Publicly release an inventory of AI use cases, to include individually-reported AI use cases and a list of agency use of certain widely used commercial AI	1(b)	January 28, 2026
Each Agency*	Report any waivers that are granted or revoked to OMB	2(a)	Within 30 days of granting/revoking
Each Agency*	Publicly release a summary of each active waiver and its corresponding justification	2(a)	April 3, 2026

* Excluding elements of the Intelligence Community.

** Excluding the Department of Defense and elements of the Intelligence Community.

5. 2025 AI USE CASE INVENTORY FIELDS

The following list represents all potential fields that a particular AI use case may be subject to. Not all AI use cases will be required to respond to every field, as required fields are dependent on the use case's maturity and risk level.

Data Type	Field
Structured Text	Use Case ID
Free Text	Use Case Name
Multiple Choice	Agency
Select all that apply.	Bureau/Component
Email	Email Address
Multiple Choice	Should this AI use case be withheld from public reporting?
Multiple Choice	Stage of Development
Multiple Choice	Is the AI use case high-impact?
Multiple Choice	Use Case Topic Area
Multiple Choice	AI Classification
Free Text	What problem is the AI intended to solve?
Free Text	What are the expected benefits and positive outcomes from the AI for an agency's mission and/or the general public?
Free Text	Describe the AI system's outputs.
Date	Date when AI use case became operational or the pilot's start date
Multiple Choice, Free Text	Was the system involved in this use case purchased from a vendor or developed under contract(s) or in-house? Vendor(s) Name, if applicable.
Multiple Choice, Free Text	Does this AI use case have an associated Authorization to Operate (ATO)? System(s) Name, if applicable.
Free Text	Describe any data used to train, fine-tune, and/or evaluate performance of the model(s) used in this use case.
Link	If the data is required to be publicly disclosed as an open government data asset, provide a link to the entry on the Federal Data Catalog.
Multiple Choice	Does this AI use case involve personally identifiable information (PII) that is maintained by the agency?
Link	If publicly available, provide the link to the AI use case's associated Privacy Impact Assessment (PIA), if any.
Select all that apply.	Which, if any, demographic variables does the AI use case explicitly use as model features?
Multiple Choice	Does this project include custom-developed code?
Link	If the code is open source, provide the link for the publicly available source code.

Fully deployed AI use cases, that are determined by the agency to be high-impact, are required to report on the following fields related to risk management.

Data Type	Field
Multiple Choice	Has pre-deployment testing been conducted for this AI use case?
Multiple Choice	Has an AI impact assessment been completed for this AI use case?
Free Text	What are the potential impacts of using the AI for this particular use case and how were they identified?
Multiple Choice	Has an independent review of the AI use case been conducted?

Multiple Choice	Is there a process to conduct ongoing monitoring to identify any adverse impacts to the performance and security of the AI functionality, as well as to privacy, civil rights, and civil liberties?
Multiple Choice	Has the agency established sufficient and periodic training for operators of the AI to interpret and act on its output and managed associated risks?
Multiple Choice	Does this AI use case have an appropriate fail-safe that minimizes the risk of significant harm?
Multiple Choice	Is there an established appeal process in the event that an impacted individual would like to appeal or contest the AI system's outcome?
Select all that apply.	What steps has the agency taken to consult and incorporate feedback from end users of this AI use case and the public?