

**American Battle Monuments Commission
Compliance Plan for OMB Memoranda M-24-10
September 2024**

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1. STRENGTHENING AI GOVERNANCE

General

- Describe any planned or current efforts within your agency to update any existing internal AI principles, guidelines, or policy to ensure consistency with M-24-10.

The American Battle Monuments Commission (ABMC) does not currently have new AI policy or guidelines in place. Prior to the release of M-24-10, ABMC had related policies, such as:

- Privacy policy & assessments
- Authority to Operate guidance (pending review and updates)
- Authority to Use guidance (pending review and updates)

ABMC has conducted AI research (but not yet implemented), such as a MITRE rover for headstone maintenance and analysis, and historical records summarization and translation. While these early efforts are out of scope of permitted use cases, ABMC's OCIO is conducting market research and feasibility studies and gathering requirements.

Many existing ABMC policies will require review and update as they are impacted by new AI initiatives within ABMC and the government at large. We will review and develop additional policy guidelines for implementation on an on-going basis.

AI Governance Bodies

- Identify the offices that are represented on your agency's AI governance body.

The ABMC AI governance body will be established effective October 1, 2024, with the following membership—

- Executive Director for Management (will serve as CAIO / Chair when position filled)
- Executive Director for Operations
- Executive Director for Education and Public Engagement
- General Counsel
- Chief Information Officer (Vice Chair) and Deputy Chief Information Officer

- Chief Financial Officer
 - Chief of Public Affairs
 - Chief Acquisitions Officer
 - Security Manager
- Describe the expected outcomes for the AI governance body and your agency’s plan to achieve them.

ABMC’s AI Governance Board shall serve as the principal governing body for all agency AI initiatives. ABMC has no AI systems in place or in development at this time. However, as we explore opportunities to enhance mission performance with AI, our governance body will analyze ABMC operations, services, and processes to determine where AI tools and practices have the potential to improve performance and/or delivery of public services. The expected outcome of this analysis will be identification of AI use cases to develop for implementation.

ABMC’s AI Governance board will establish governance framework and coordinate internal and external stakeholders collaboration and engagement.

Key responsibilities of the AI Board will include—

- Spearheading and approving ABMC enterprise strategy on advancing the responsible use of AI tools and processes.
- Creating and approving policies and processes to review AI safety, privacy, security, and success/test measures for compliance with Federal requirements.
- Providing inputs and change management leadership in critical stages of AI development, operations and maintenance, and devolution of AI tools and procedures.
- Continuously evaluating AI implementation and investments for mission fitness.
- Resolving potential conflicts between AI stakeholders, such as mission and program offices involved in procurement, development, testing, use, and support of AI tools and processes.
- Scaling AI based on experience, lessons learned, business context, etc. in the areas of risk management and return on investment.
- Sponsoring and ensuring the buy-in across ABMC’s community of stakeholders of approved AI tools and processes.
- Reviewing and consulting with Agency executives responsible for AI program status, reporting requirements, and stakeholder management to oversight agencies such as OMB, DNS, and GAO, etc.
- Other duties as designed by OMB, GAO, DHS, etc.

ABMC’s AI plan ultimately will include deliberate investments in turn-key market-leading tools, success factors for each AI use case, and pilot programs to test the use cases in ABMC’s real-world scenarios, ensuring that AI applications and practices adhere to the Administration guidance on appropriate AI use cases, such as proactively addressing potential biases and ethical concerns within each AI use case.

- Describe how, if at all, your agency’s AI governance body plans to consult with external experts as appropriate and consistent with applicable law. External experts are characterized as individuals outside your agency, which may include individuals from other agencies, federally funded research and development centers, academic institutions, think tanks, industry, civil society, or labor unions.

Initially, ABMC governance body analysis and deliberations will be internally focused. We will reach out to external experts as required to assist in developing specific targeted AI uses.

ABMC has several existing partnerships with AI leading institutions and organizations such as MITRE and Microsoft to share ideas and learn from best practices in implementing AI tools within the public sector.

ABMC will implement a risk management program to include assessment protocols, ensuring that controls are proactively put in place to reduce and mitigate known AI biases and ethical concerns. Secondly, ABMC will provide or cite AI algorithms, data sources, and decision-making processes in each AI use case. We will continuously monitor and establish evaluation criteria for performance to ensure the chosen AI applications, approaches, or tools continuously meet Federal regulations and guidance.

ABMC staff will be trained to use AI in support of ABMC’s sacred mission honoring and preserving America’s military legacy of service and sacrifice.

AI Use Case Inventories

- Describe your agency’s process for soliciting and collecting AI use cases across all sub-agencies, components, or bureaus for the inventory. *In particular, address how your agency plans to ensure your inventory is comprehensive, complete, and encompasses updates to existing use cases.*

N/A – ABMC currently has no written and approved AI use cases.

Reporting on AI Use Cases Not Subject to Inventory

- Describe your agency’s process for soliciting and collecting AI use cases that meet the criteria for exclusion from being individually inventoried, as required by Section 3(a)(v) of M-24-10. *In particular, explain the process by which your agency determines whether a use case should be excluded from being individually inventoried and the criteria involved for such a determination.*

N/A – ABMC currently has no written and approved AI use cases.

- Identify how your agency plans to periodically revisit and validate these use cases. *In particular, describe the criteria that your agency intends to use to determine whether an AI*

use case that previously met the exclusion criteria for individual inventorying should subsequently be added to the agency's public inventory.

N/A – ABMC currently has no written and approved AI use cases.

2. ADVANCING RESPONSIBLE AI INNOVATION

Removing Barriers to the Responsible Use of AI

- Describe any barriers to the responsible use of AI that your agency has identified, as well as any steps your agency has taken (or plans to take) to mitigate or remove these identified barriers. *In particular, elaborate on whether your agency is addressing access to the necessary software tools, open-source libraries, and deployment and monitoring capabilities to rapidly develop, test, and maintain AI applications.*

N/A – ABMC currently has no AI use cases, so no known barriers can be identified as this time. As briefly outlined above, the AI governance board will issue and implement governance and risk management frameworks to monitor all AI innovations and continuous use within the agency. This includes training and knowledge sharing with internal and external stakeholders to encourage the successful adoption of AI practices and solutions. We will, of course, commit to working to avoid or mitigate barriers if and when we implement AI systems within the agency.

- Identify whether your agency has developed (or is in the process of developing) internal guidance for the use of generative AI. *In particular, elaborate on how your agency has established adequate safeguards and oversight mechanisms that allow generative AI to be used in the agency without posing undue risk.*

N/A – internal guidance will be developed when generative AI is implemented.

AI Talent

- Describe any planned or in-progress initiatives from your agency to increase AI talent. *In particular, reference any hiring authorities that your agency is leveraging, describe any AI-focused teams that your agency is establishing or expanding, and identify the skillsets or skill-levels that your agency is looking to attract. If your agency has designated an AI Talent Lead, identify which office they are assigned to.*

N/A – when we determine potential use of AI within the agency, we will evaluate the need to recruit AI talent at that time. The Deputy Chief Human Capital Officer would be the lead for such recruitment. We also will consider upskilling current staff at fair market wages.

- If applicable, describe your agency's plans to provide any resources or training to develop AI talent internally and increase AI training opportunities for Federal employees. *In particular, reference any role-based AI training tracks that your agency is interested in, or actively*

working to develop (e.g., focusing on leadership, acquisition workforce, hiring teams, software engineers, administrative personnel or others).

N/A – this, too, will be dependent on agency identification of potential AI uses within the agency. Training will be provided for foundational AI practices, and application-specific methodologies and best practices to effectively use AI tools in support of the ABMC mission.

AI Sharing and Collaboration

- Describe your agency’s process for ensuring that custom-developed AI code—including models and model weights—for AI applications in active use is shared consistent with Section 4(d) of M-24-10.

N/A – ABMC currently has no written and approved AI use cases at this time.

- Elaborate on your agency’s efforts to encourage or incentivize the sharing of code, models, and data with the public. Include a description of the relevant offices that are responsible for coordinating this work.

N/A – ABMC currently has no AI use cases.

If and when ABMC has code, models or data appropriate to share with the public, responsibility for coordinating that effort will be shared by the Executive Director of Education and Public Engagement and the Chief Information Officer.

Harmonization of Artificial Intelligence Requirements

- Explain any steps your agency has taken to document and share best practices regarding AI governance, innovation, or risk management. *Identify how these resources are shared and maintained across the agency.*

N/A – ABMC currently has no written and approved AI use cases at this time.

3. MANAGING RISKS FROM THE USE OF ARTIFICIAL INTELLIGENCE

Determining Artificial Intelligence Presumed to be Safety-Impacting or Rights-Impacting

- Explain the process by which your agency determines which AI use cases are rights-impacting or safety-impacting. *In particular, describe how your agency is reviewing or planning to review each current and planned use of AI to assess whether it matches the definition of safety-impacting AI or rights-impacting AI, as defined in Section 6 of M-24-10. Identify whether your agency has created additional criteria for when an AI use is safety-impacting or rights-impacting and describe such supplementary criteria.*

N/A – ABMC currently has no written and approved AI use cases.

As the agency develops AI uses, we will remain conscious of the need to identify and mitigate risks to rights and safety as defined in Section 6 or M-24-10.

- If your agency has developed its own distinct criteria to guide a decision to waive one or more of the minimum risk management practices for a particular use case, describe the criteria.

N/A – ABMC currently has no written and approved AI use cases.

- Describe your agency’s process for issuing, denying, revoking, tracking, and certifying waivers for one or more of the minimum risk management practices.

N/A – ABMC currently has no written and approved AI use cases.

Such processes will be developed and evolve as AI uses are considered for implementation.

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

- Elaborate on the controls your agency has put in place to prevent non-compliant safety-impacting or rights-impacting AI from being deployed to the public.

N/A – ABMC currently has no written and approved AI use cases.

Controls will be developed as AI uses are developed.

- Describe your agency’s intended process to terminate, and effectuate that termination of, any non-compliant AI.

N/A – ABMC currently has no written and approved AI use cases.

The need for such processes should be reduced by ensuring that any AI uses developed or implemented by ABMC are compliant.

Minimum Risk Management Practices

- Identify how your agency plans to document and validate implementation of the minimum risk management practices. *In addition, discuss how your agency assigns responsibility for the implementation and oversight of these requirements.*

Documentation and validation of minimum risk management practices will be determined if and when ABMC develops and adopts AI uses.