

# EPA Data Governance Council

Meeting Summary – February 26, 2024

## General Chief Data Officer Updates

- Chief Data Officer, Richard Allen, informed the Council about a few upcoming communication projects and data calls.

## Regulated Facility Governance Subgroup

- Regulated Facility Governance Subgroup lead, Ana Greene presented an update about the creation of the subgroup.
- A survey and a series of interviews were conducted to identify the most prevalent regulated facility data management issues. The subgroup was established to address the top 6 long-standing regulated facility data management issues.
- The subgroup leads are Ana Greene, Matt Lee and Carey Johnston.
- Any EPA staff member may attend the quarterly subgroup meetings but there are voting members of the subgroup from EPA offices, EPA regions, states and tribes that make final decisions regarding the subgroup tasks.
- Task Forces have been created to address regulated facility governance for corporate data, data lifecycle roles and responsibilities, common facility data models, and sub-facilities.
- Ana provided a list of subgroup and task force leads in the slides and encouraged DGC members to reach out to those leads if they were interested in joining the subgroup or a specific task force. Alternatively, staff can contact the voting member of their office or region if they have suggestions or questions related to the Regulated Facility Governance Subgroup.

## Artificial Intelligence Updates and Discussion

- AI Subcommittee Chair, Andrew Chase, provided updates and led a discussion about EPA's current AI projects.
- The Office of Management and Budget has drafted new AI standards and instructions related to federal AI system use and inventory records, but the new guidance has not been released.
- The Office of Digital Services and Technical Architecture has several active AI projects:
  - Establishing an internal Generative AI tool.
  - Establishing a GenAI tool that uses public data.
- The first discussion topic was about changes to the EPA AI Inventory process.
  - The EPA public AI Inventory currently only includes 3 systems.
  - The annual inventory is typically completed in May but may be delayed by the release of new OMB guidance.
  - All AI system owners will be asked to complete the EPA AI Inventory form once the new OMB guidance is received, and the form has been updated. Information Management Officers will be asked to help ensure that all AI systems are included in the inventory.

- The AI Subcommittee will assess the AI Inventory form responses according to OMB standards and determine which systems need to be included in the public inventory.
- The annual data call for inventory updates will continue but additionally, there have been steps added to processes such as the Federal Information Technology Acquisition Reform Act process to direct new projects to the form as they are introduced into the EPA environment.
- The second discussion topic was about defining what research and development projects qualify for the AI Inventory submission requirements.
  - Generally, AI system owners will be responsible for completing the AI Inventory form, however, there are instances when an AI tool is created by one group but implemented for different purposes or projects.
  - The Council discussed the criteria that would determine when an AI tool or project needs to be reported independently from the original system and what reporting responsibilities would be applied to the system creators and the system users.
  - Research and development projects are currently exempt from public reporting, but they should still be captured in the internal inventory.
  - Research and development system owners and users should clearly report whether the project results are used for regulatory purposes or are used to create products that are not exempt from being reported.
- The third discussion topic was about the rules of behavior required for using GenAI at EPA.
  - ODSA has created a draft of GenAI Rules of Behavior that EPA staff would be required to learn before they can use GenAI systems at EPA.
  - GenAI training needs to reinforce the requirement that all uses of AI should be recorded clearly, even if someone just uses an AI system to validate coding or a document's content.