



U.S. Environmental Protection Agency Compliance Plan for OMB Memorandum M-25-21

U.S. Environmental Protection Agency

Compliance Plan for OMB Memorandum M-25-21 October 2025

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In response to the Office of Management and Budget Memorandum M-25-21: Accelerating Federal Use of AI through Innovation, Governance, and Public Trust, the U.S. Environmental Protection Agency is establishing organizational structures and methods to evaluate artificial intelligence projects to meet the requirements of this memorandum. This document serves as EPA’s compliance plan required under Section 104(c) of the AI in Government Act of 2020,¹ which established the AI Center of Excellence, and Section 3(b)(ii) of the Appendix of the OMB Memorandum M-25-21.²

1. Driving AI Innovation

EPA’s Office of Mission Support, which houses EPA’s Chief AI Officer and Responsible AI Official, leads the effort to update EPA AI principles, guidelines, and policies to ensure consistency with OMB Memo M-25-21. Since the release of M-25-21, EPA leadership has prioritized leveraging new AI technologies to streamline business processes and reduce overhead costs benefiting the American public.

Several efforts to improve EPA’s AI principles, guidelines, and policies as well as to provide agency-wide AI tools are ongoing. The sections below describe the actions that the EPA AI governance groups are taking to move forward with these initiatives. The following sections also elaborate on efforts of management and the workforce across EPA involved with exploring potential AI uses and governance for streamlined development and deployment.

1.1 Removing Barriers to the Responsible Use of AI

In 2022, EPA performed an AI maturity assessment, rating the agency at a maturity level of 2 out of 5. This corresponds to an “active” or “experimental” level of usage, where AI benefits are realized in specific areas, but not widespread across the agency. The primary exception is pockets of EPA researchers routinely using AI at expert levels.

EPA’s goal is to approach a level 3 and 4 in other areas of its business lines, creating better results while being more efficient in the process. This aligns with EPA’s continuous improvement program, which looks for processes that can be improved.

¹ Pub. L. No. 116-260, div. U, title 1, § 104, available at <https://www.congress.gov/116/plaws/publ260/PLAW-116publ260.pdf>.

² 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-ofAI-through-Innovation-Governance-and-Public-Trust.pdf>.

The most significant barriers identified were a general lack of AI tools, difficulty in planning and integrating complex data architectures required for AI, and shortage of federal and contracted workers skilled in AI development and use. To address these barriers, EPA is investing in its overall architecture to deploy more robust AI tools. These investments include data fabric, cloud infrastructure, network infrastructure, and additional security, operational, financial, and post deployment monitoring tools.

In 2025, EPA deployed a secure, internal agency-wide Generative AI tool. Ultimately, EPA will provide additional tools designed for a specific purpose, i.e. embedded in existing software, as well as providing general purpose AI tools that can assist with day-to-day tasks and queries.

EPA has three projects in place to support GenAI:

- Internal GenAI Tool – In May of 2025, EPA released its first secure, internal GenAI chat tool to enable employees to learn how to use GenAI in a safe environment within the EPA boundaries.
- Rules of Behavior guidance and analysis – EPA released a video and document for employees which outlines the rules for appropriate use of GenAI tools. EPA personnel are responsible for following these rules to ensure safe and appropriate use of GenAI at the EPA. They include guidelines for approved and unapproved uses of this technology.
- Other GenAI Technologies – EPA is exploring making available to personnel other existing GenAI tools to support AI use cases to improve the workforce or business processes. Examples include AWS Bedrock, Meta Llama, Anthropic, and Microsoft 365 Copilot.

Using the active EPA AI community of practice, the annual information technology portfolio review, and the inventory of AI use cases, EPA's Office of Mission Support monitors the tools, technologies, open-source libraries, or AI resources needed, continually updating its project plans to reflect the latest EPA priorities.

The EPA AI community of practice also serves as a conduit for sharing knowledge in the application and development of AI at the agency. This includes training and support for staff with challenges in planning and integrating complex data architectures required for AI.

1.2 Sharing and Reuse

EPA has fully embraced Government initiatives for sharing code, embracing collaborative development, and re-using technologies. For example, EPA has a large open-source presence with source code publicly posted on Science Hub on data.gov

(<https://catalog.data.gov/dataset/epa-sciencehub>), GitHub (<https://github.com/usepa>), and on digital.gov. The EPA's GitHub site is one of the more popular federal government GitHub repositories for staff development, collaboration, and code sharing. EPA's Office of Mission Support is responsible for maintaining our various code repositories.

In terms of AI use case development, one of the actions in our governance process is to guide developers of AI models towards more sharing of code, models, and the data when appropriate and in line with M-25-21.

EPA has a large Data Science community of practice, which spans EPA's program offices and regions. This community has a robust culture of code sharing, so we do not expect any difficulty in making new AI specific code available when possible.

1.3 AI Talent

EPA has initiated several efforts to enhance its workforce's familiarity with AI:

- Offering AI training and development opportunities for existing staff to enhance the quality, productivity and efficiency of their work and business processes.
- Leveraging AI specific competencies to augment recruitment actions across the wide range of disciplines and positions involved in AI adoption, application, and integration. Additionally, providing webinars and showcases to share successful AI implementations as they are rolled out.
- Exploring available extramural resource channels that can be easily accessed and broadly applied to provide hands-on training or focus on specific use cases in the agency.

Additionally, the agency has mandatory IT training in cybersecurity, which includes AI topics. The EPA has procurements with several IT development and support vendors that offer a variety of hands-on AI training with case-based solutions for research and other business areas. The EPA also has an agency-wide developers forum that meets quarterly to showcase various applications or solutions to provide online training to staff and EPA contractors. In addition, EPA's long-standing Data Science community of practice has breakout groups that support staff on AI and other related specialties, including python, R, modeling, and statistics.

2. Improving AI Governance

EPA's Office of Mission Support has established two AI governing groups and is leveraging and refocusing one user group to promote the safe adoption of AI.

2.1 AI Governance Board

In compliance with OMB Memorandum M-25-21, EPA established an AI Governance Board to manage and monitor the roll-out of artificial intelligence at the EPA.

2.1.1 Executive-Level AI Governance Bodies

EPA created a political level AI Governance Board, which is specified by OMB Memorandum M 25-21. This board is chaired by the EPA Deputy Administrator and vice-chaired by the EPA Chief AI Officer.

The AI Governance Board assumes all responsibilities outlined in OMB Memo M-25-21, including oversight and coordination of the responsible use of AI across the agency. This group contains political leadership who sets strategic vision, with career Senior Executive Service members in the Chief Information Officer (CIO) - Senior Advisory Council aligning resources and plans accordingly. These groups decide on agency priorities and approve governance policy.

The AI Governance Board and subsequent CIO - Senior Advisory Council consists of senior executives from the following EPA offices:

- Air and Radiation
- Chemical Safety and Pollution Prevention
- Enforcement and Compliance Assurance
- Chief Financial Officer
- General Counsel
- Land and Emergency Management
- Mission Support
- Water

The AI Governance Board also includes one EPA regional representative and a representative from EPA's Scientific Integrity Committee.

This group will oversee EPA's AI activities, finalize and approve AI policy, and approve EPA's AI use case inventory. All plans and the AI strategy will be reviewed periodically.

Expected artifacts/outcomes include:

- AI compliance plan
- AI strategy
- Annual AI use case inventory
- Aligning the AI strategy with the agency's overall strategic plan

2.1.2 Data Governance Advisory Committee AI Subcommittee

The second AI group is a subcommittee of EPA's Data Governance Advisory Committee tasked with assisting the executive-level AI Governance Board. This group consists of staff with expertise in AI or other support disciplines, e.g., senior EPA management, IT development and operations, program specific expertise, and legal. The group is led by the EPA Responsible AI Official and Chief Data Officer. The planned assistance will involve collecting AI use cases, generating an AI use case inventory, updating policies to govern EPA's AI activities and developing and posting the AI strategy. These artifacts will be reviewed by the Chief AI Officer, Deputy CIO, CIO, and/or members of the Executive AI Governance Board for approval prior to release on the EPA website. The subcommittee will also work directly with groups identified with high-impact AI use cases to ensure that their activities follow the minimum practices outlined in OMB Memorandum M-25-21.

2.1.3 AI Interested Users Group

EPA's AI Interested Users Group, referred to as the AI community of practice, within the EPA Data Science community of practice, is a non-governing group with open membership. The goal of the AI community of practice is to help provide training, shared experiences, and the transfer of knowledge, ideas, best practices, and news relating to AI practitioners wanting to learn more about AI in the workplace. They strive to advance the use of responsible AI in areas ripe for collective innovation in day-to-day EPA operations, social media, legal, programmatic activities, and scientific endeavors.

2.1.4 Consulting with Outside Experts

Early on, EPA's Chief AI Officer discovered valuable resources by partnering with agencies like the US Department of Agriculture, the Department of the Interior, and the Department of Energy, as well with our contractors who already provide cloud computing and early machine learning/AI solutions both to our staff and in other government agencies. More directly, EPA participates in the following:

- The General Services Administration Inter-agency AI community of practice, inter-agency councils with AI specific topics and activities, such as CIOs Council, Chief Data Officers Council, and Chief AI Officers Council.

- Interagency AI meetings, notably with DOI, DOE, and NASA.
- Collaboration with academic institutions, such as the University of Chicago and Stanford University, on data science projects.
- Conversations with industry analysts and leveraging EPA’s technology focused contractors.
- Using research library subscriptions.
- Attending IT webinars online to learn more about AI use cases, and features and conferences which include hands on training, AI product overviews, and opportunities to exchange questions to learn more from experts.
- Working with industry partners including Microsoft and Amazon.

2.2 Agency Policies

EPA developed a Generative AI Rules of Behavior document to provide internal guidance to employees and EPA contractors on the safe and appropriate use of GenAI. Safeguards include:

- Protections built into the GenAI tooling provided (such as restrictions on types of prompts).
- Awareness of CUI, CBI, and litigation hold guidance for limited use.
- Awareness of responsibilities for records management.
- Awareness of responsibilities to authenticate and accurately represent the use of AI responses in published EPA artifacts.
- Monitoring and review of GenAI use.
- Limitations on use cases allowed.
- Training specifically designed to reduce risk.

EPA plans to review and update existing policies to address any scenario where these policies may overlap with the use of AI. Boilerplate language such as “Please see the EPA Rules of Behavior for use of AI at the EPA for efforts related to [insert policy name] per Executive Orders OMB M-25-21 and M-25-22, respectively.” will be included as needed. Relevant policies include, but are not limited to:

- IT Infrastructure/Architecture policies
- Data policies

- Cybersecurity policies
- Privacy policies

2.3 AI Use Case Inventory

Since 2021, EPA has collected use cases in compliance with Executive Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government*,³ and subsequent authorities governing the use of AI. EPA's current published AI inventory can be found on EPA's public website at <https://www.epa.gov/data/epa-artificial-intelligence-inventory>.

EPA annually collects use cases through a data call process using an online form and a PowerBI tool for continual reporting. Information Management Officials, Senior Information Officials and Data Officers (component level chief data officers) in each EPA office and region work with staff to identify and collect known use cases. In addition, use cases are collected through EPA's IT acquisition process and through scientific research tracking system to identify all projects or tools that may contain known, ongoing, or proposed AI activities.

EPA continually collects use cases through an open submission process. The inventory is augmented through an annual data call to capture additional AI use cases. The final list of AI use cases is presented to the Data Governance Advisory Committee AI Subcommittee to identify any use cases that do not need to be reported, for example scientific use cases that are used for published research and are not an ongoing operational system. The subcommittee develops and maintains the inventory and ensures that it is delivered to AI Governance Board members for review, submission to OMB and, where applicable, published on our public-facing web site.

EPA will ensure that the inventory is complete by leveraging existing processes and positions within each EPA office and region:

- Leveraging existing officials, specifically the Information Management Officers, Senior Information Officers and Data Officers across the agency to ensure adequate coverage across the programmatic and regional level.
- Leveraging existing processes, e.g., the Federal Information Technology Acquisition Reform Act (FITARA) process and application deployment processes to capture & verify newly proposed AI use cases.

³ Exec. Order No. 13960, 85 Fed. Reg. 78939, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government*, (Dec. 3, 2020).

- Leveraging EPA officials across the agency with additional expertise when needed, to ensure use cases are analyzed to determine whether they meet the criteria for public reporting or whether they may be excluded from reporting.

Then throughout the year, EPA continues to collect new use cases through the above process to get real-time updates as work progresses.

3. Fostering Public Trust in Federal Use of AI

3.1 Determinations of Presumed High-Impact AI

Through the AI use case inventorying process described above, EPA will collect information to identify use cases that could potentially meet the definition of high-impact AI, as defined by OMB Memorandum M-25-21. The AI Governance Board and the Data Governance Advisory Committee AI Subcommittee are responsible for reviewing the AI inventory responses to determine if any use cases meet the definition of high-impact AI. The subcommittee is responsible for ensuring the potential high-impact use case(s) comply with the minimum practices outlined in M-25-21.

The AI Subcommittee will review AI use case submissions and prior submissions to ensure use cases meet exclusion criteria as defined by Executive Orders, OMB memoranda and other supporting documentation. They will rely on existing documentation from the use case inventory that follows OMB use case inventory guidance for data collection. If the documentation does not provide enough information to decide, the subcommittee will interview the use case point of contact to solicit additional information before making a determination.

EPA plans to follow the definitions and presumed high-impact use cases as outlined in OMB Memorandum M-25-21 and subsequent OMB guidance documents when making such determinations. EPA has not developed its own criteria for waiving any of the minimum risk management practices and will follow the OMB Executive Order or supporting guidance documents. EPA plans to develop a waiver process before the relevant deadline.

If a waiver is sought for any AI use case, the case would be brought to the Data Governance Advisory Committee AI Subcommittee for discussion. The committee will be responsible for making a recommendation on each use case. The recommendation would be presented to the Chief AI Officer for final disposition of the waiver request.

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

The Data Governance Advisory Committee AI Subcommittee will identify any AI risks related to the implementation of AI uses cases deployed across the agency via the AI use case review process.

The AI Subcommittee is also responsible for assisting the senior management and project management teams in documenting and validating implementation of minimum risk management practices for their offices.

- The AI Subcommittee assigns responsibilities for project implementation and oversight, depending on the AI project, as appropriate.
- The security processes in place today ensure that non-authorized systems are not shared publicly, with the AI inventorying and certification of high-impact use case analysis being part of that security review and signoff.

If any system has been determined to be non-compliant, it will be terminated or taken offline in accordance with EPA's security policies, with the Chief AI Officer having the authority for terminating any non-compliant system.

4. Conclusion

EPA is committed to ensuring that all AI applications and custom use cases are compliant with OMB Memorandum M-25-21 and remains dedicated to collaborating with the White House Office of Science and Technology Policy, the Office of Management and Budget, and the broader government AI community. EPA is also committed to maintaining our compliance plans as directed if M-25-21 is updated or replaced.