



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

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1. DRIVING AI INNOVATION

1A. REMOVING BARRIERS TO THE RESPONSIBLE USE OF AI

The new USDA AI Strategy includes 5 strategic goals and 16 objectives focused on removing key barriers to trusted and scalable AI at USDA. While these barriers are not all-inclusive, they represent challenges across multiple domains that require sufficient investment to overcome.

Development of Mature AI Testing Environment

USDA has established the AI Lab, currently in its early adoption phase. The CAIO and Chief Technology Officer (CTO) partnered to build this shared environment where USDA Mission Areas and Staff Offices can collaborate, share code and lessons learned, and utilize common cloud infrastructure. When fully operational, this environment will assist USDA in rapid capability deployment and provide justified confidence to executives and practitioners regarding the business value of AI products.

Commercial Software Review Challenges

USDA faces numerous challenges reviewing commercial software containing Generative AI, including:

- Limited resources to review terms of service
- Inadequate assessment of guardrails
- Insufficient testing of software limitations
- Difficulty gathering technical information such as foundation models used

These challenges have been exacerbated by the rapid pace of vendor adoption of Generative AI. USDA has expressed interest in collaborating with NIST and other Federal agencies to establish standards guiding vendors toward minimum standard feature sets to accelerate adoption across all agencies.

The CAIO, in partnership with the CTO and Chief Information Security Officer (CISO), developed a process to review Generative AI in commercial software in Fiscal Year 2025. In Fiscal Year 2026, USDA will work to identify systems with an Authority to Operate that contain Artificial Intelligence.

Funding and Resource Limitations

Limited dedicated funding and resources for AI make effective implementation difficult in an austere budget environment, increasing the risk of improper deployments. The FY26-27 USDA AI Strategy helps optimize limited resources by aligning capacity building and barrier-reducing activities to strategic goals and objectives. In September 2025, USDA conducted an Agency-wide assessment of AI programs and funding to document current state and understand future funding requirements.

Data Readiness for AI Initiatives

While USDA has made strides in improving data readiness, opportunities remain to enhance data preparation for AI. USDA continues implementing Title II of the Evidence Act requirements. The [USDA Data Strategy for FY2024-FY2026](#) identifies improvement areas to increase maturity for analytics and AI initiatives, while the FY26-27 USDA AI Strategy identifies additional objectives to close the data readiness gap.

AI Literacy and Talent Development

Like most federal agencies, USDA needs to develop AI literacy and talent further. Without significant investment to increase workforce AI literacy and attract AI talent, our ability to execute the FY26-27 USDA AI Strategy will be limited. Additional details are outlined in the AI Talent section below.

1B. SHARING AND REUSE

The CAIO has partnered with the Chief Technology Officer to leverage existing work encouraging code sharing within USDA and ultimately with the public, providing a consistent experience for internal and external code sharing.

Enterprise Data Platform

USDA has made significant progress establishing an enterprise data platform for common use. In Fiscal Year 2025, the CAIO (dual-hatted as CDO) strengthened USDA's enterprise data platform by migrating from third-party to in-house hosting, concluding successfully at the end of FY25. This effort is expected to:

- Lower long-term costs
- Expand availability of AI tools within the enterprise data platform
- Facilitate data and model sharing
- Enable USDA to leverage curated datasets for AI use cases by positioning data closer to models and compute

Code and Data Sharing

In addition to promoting internal sharing and reuse of AI code, models, and data assets, USDA continues leveraging platforms like data.gov for public data sharing. In partnership with the CTO and Assistant Chief Data Officers, the CAIO fosters a culture of code sharing within USDA and with the public. The CAIO coordinates with the USDA Public Access and Open Science forum implementing research results sharing. USDA's implementation of the SHARE IT Act will increase code sharing between agencies and with the public.

1C. AI TALENT

USDA requires foundational and advanced AI skillsets, including governance and risk management, data and AI engineering, data science and machine learning, user experience, change management, cybersecurity, and procurement. Individuals with technical talents could have the most impact streamlining back-end operations and improving mission delivery.

The CAIO has partnered with the Office of Human Resources Management (OHRM) and USDA Digital Service to enhance AI talent at USDA. USDA's AI Talent Lead is housed in OHRM.

University Engagements

USDA sponsored several external university engagements to increase brand awareness and attract talent. In Fiscal Year 2025, the CAIO partnered with Colorado State University, University of Florida, University of Texas at Dallas, and University of Maryland, Baltimore County to use data and AI solving real problem statements. USDA pursues other university engagements including embedding problem statements in classroom settings as course capstones, giving students opportunities to experience USDA Data Scientist work. In Fiscal Year 2026, USDA will continue sponsoring university engagements to build brand awareness and increase readiness to leverage Direct Hire Authorities.

Empowering America's Youth with AI

USDA commits to fostering AI talent by prioritizing AI in the 4-H Youth Development Program and Cooperative Extension System, including integrating AI-based tools and processes into curriculum, responding to [Executive Order 14277 on Advancing AI Education for American Youth](#). The Secretary of Agriculture serves on the White House Task Force on AI Education supporting cross-government efforts promoting American AI literacy and proficiency. The CAIO supports the Presidential AI Challenge in 2026.

AI Center of Excellence

The AI Center of Excellence (CoE), open to data and AI practitioners across USDA, meets monthly to share best practices and showcase AI use cases. The CoE connects practitioners across Mission Areas and Staff Offices to accelerate pilot timelines and technology learning. The AI CoE built and maintains an internal site linking to the Inventory, providing USDA-specific guidance and definitions from relevant policies and executive orders, answering FAQs, and launching an interactive internal dashboard helping users identify and track AI use.

AI Direct Hire Authority

In partnership with USDA's Chief Human Capital Officer (CHCO) and USDA Digital Service, USDA issued internal guidance leveraging the Office of Personnel Management (OPM) AI and AI-enabling Direct Hire Authority (DHA) across the Department, including reporting instructions and internal controls. Since this guidance, USDA has posted several positions leveraging the AI DHA, reducing hiring time and making USDA AI positions more competitive.

Shared Certificates

USDA's CHCO issued policy and procedural guidance on shared certificates within USDA and between USDA and other Federal Agencies. This policy normalizes a scaled hiring approach, allowing multiple hiring managers across agencies with similar needs to unlock economies of scale and create efficiencies. Routine consideration of applicants through shared certificates has significantly simplified and expedited the Department's hiring process.

Inter-Agency Partnerships

USDA actively engages in multiple inter-agency working groups building AI workforce capabilities across government in compliance with recent Executive Orders and OMB guidance. Notable working groups where USDA has contributed include OMB AI Training and Talent working groups, OPM's Tech-2-Gov working group, OPM's AI Playbook, MITRE-facilitated NSF Scholarship for Service in AI program, the GSA AI Community of Practice, and the AI Education Task Force, to name a few.

US Digital Corps Fellows

USDA strategically focuses on early career and internship programs to recruit AI talent. In partnership with GSA, USDA expanded its US Digital Corps Fellows footprint for AI and AI-enabling work from two Fellows in Fiscal Year 2024 to eight in Fiscal Year 2025. These Fellows support the Assistant Chief Data Officer for the U.S. Forest Service, the Chief AI Officer, and the CISO on data and AI efforts.

Student Intern Programs

In partnership with USDA Digital Service, the CAIO encourages use of Pathways intern programs and other programs such as Virtual Student Federal Service and Coding It Forward to contribute to the AI mission while building internal talent and creating a "talent acquisition bench." Since starting this initiative in Fiscal Year 2024, the CAIO has brought in over 30 interns through various programs. In Fiscal Year 2025, the CAIO continued partnering with USDA Digital Service and other groups to increase USDA's awareness and participation in early career programs for data and AI talent.

Training

In partnership with USDA Digital Service, the CAIO worked with Assistant Chief Data Officers (ACDOs), who additionally serve as USDA's Assistant Chief AI Officers, to determine data and AI training needs and implementation barriers requiring Departmental assistance.

USDA Data Science Training Program

USDA is improving and maturing its Data Science Training Program to handle additional AI topics such as machine learning, natural language processing, and generative AI. This 9-month program provides USDA staff an environment to learn data science skills through curated learning tracks, monthly exercises and review sessions, guest lectures and workshops, facilitator support, mentorship, and capstone projects. In Fiscal Year 2026, USDA will continue improving the program by partnering with other Federal organizations to share best practices.

AI Training

USDA has launched a "USDA Generative Artificial Intelligence Learning Journey" in partnership with Skillsoft through its AgLearn learning management system. This journey consists of 5 tracks with 15 courses, with completion earning badges and certificates. The Agricultural Research Service's (ARS) scientific computing program, SCINet, along with the AI Center of Excellence, develops and provides various AI-related training opportunities including live workshops and online tutorials covering data science fundamentals to advanced machine learning applications. SCINet provides account holders access to AI and machine learning courses on Coursera. In Fiscal Year 2025, USDA piloted free trainings through InnovateUS, offering fundamental Generative AI

skills for the workforce and leadership courses for scaling AI. In Fiscal Year 2026, USDA will continue expanding training across the Department.

Hands-on Experience

USDA leverages hackathons and rapid prototyping events to provide workforce opportunities with latest tools focusing on real-world problems. The CAIO has sponsored internal hackathons at events like the USDA Innovation Symposium to attract and develop internal talent. The AI CoE ran several cross-agency pilots as learning experiences, and National Agricultural Statistics Service (NASS) held several Machine Learning hackathons. In Fiscal Year 2026, the CAIO will sponsor more rotational details and assignments to give current employees opportunities to hone skills and return to their agencies with new relationships and skillsets.

Hands-on Opportunities with USDA AI Lab – Rotational Details

In partnership with the CAIO, CTO, and Mission Areas, USDA continuously provides opportunities for existing workforce to leverage training and on-the-job training to increase familiarity with AI and AI infrastructure services. Rotational details focus on AI-enabling capabilities aligned to current IT services architectures, responsible AI, security, and data readiness for common AI applications. In Fiscal Year 2026, the CAIO and CTO will expand rotational details to provide more hands-on AI and AI-enabling work opportunities.

2. IMPROVING AI GOVERNANCE

2A. AI GOVERNANCE BOARD

AI governance at USDA is led by the USDA AI Council and the Generative AI Review Board (GAIRB). The USDA AI Council provides the Secretary of Agriculture with recommendations on strategic approaches to AI needed to achieve the Department's mission and business requirements, including definition and implementation of the FY26-27 USDA AI Strategy. This executive group is complemented by the GAIRB, which governs generative AI.

The USDA AI Council includes the following offices and positions as voting members:

- The Deputy Secretary (Chief Operating Officer), Chair
- The Chief Artificial Intelligence Officer (CAIO), Vice-Chair
- Deputy Chief Data Officer, Secretary
- The Chief Information Officer
- The Chief Technology Officer
- The Chief Financial Officer
- The Assistant Secretary for Administration
- Assistant Secretary for Civil Rights
- Office of the General Counsel
- Director of the Office of Information Affairs
- Senior Advisor to the Secretary

In FY25, USDA built on foundational work with external partners conducted during FY24 related to Generative AI training, third-party AI product testing, and cross-government sharing of best practices. Work with external experts in FY25 included: working with the Federal CAIO Council on Generative AI Rules of Behavior; working with other federal partners on AI adoption best practices; leading an interagency AI Community of Practice presentation on AI red teaming; and working with several academic partners on innovative approaches to AI exploration and development. We expect the list of external partnerships to grow with time and experience.

2B. AGENCY POLICIES

In FY25, USDA drafted a Departmental Regulation (DR) on AI to ensure consistency with M-25-21, expected to be published Fall 2025. This DR outlines roles and responsibilities, including for Assistant Chief Data Officers, the USDA AI Council, and other key data and AI stakeholders. Additionally, this DR establishes policy covering the full AI lifecycle, including pre-development, development, testing, deployment, post-deployment, and procurement.

Generative AI Guidance

The DR on AI includes an appendix regarding Generative AI. This DR updates the previously published interim Generative AI guidance from October 2023. A key component of our internal guidance for Generative AI use is the Generative AI Review Board (GAIRB) that reports to the CAIO and makes recommendations on whether to move forward with Generative AI use cases. The GAIRB includes Departmental and Mission Area representation, including our Civil Rights office, the Chief Information Security Officer, the Chief Technology Officer, and our General Counsel's office. To date, the GAIRB has reviewed over 30 proposals, approving over two dozen to move forward into an exploration phase.

2C. AI USE CASE INVENTORY

USDA maintains a centralized repository to track its AI Inventory, ensuring a comprehensive record of AI initiatives across the agency. This repository includes essential resources such as latest guidance for submission, definitions of AI according to relevant policies, and pertinent executive orders. The repository's structured fields align with OMB requirements, capturing necessary information for submission, plus additional context and historical data to inform public disclosure decisions.

While the list is available for updates year-round, the CAIO sends out a call for information semi-annually to ensure use case information is current for OMB submissions and the public website. The data call goes to Mission Area Assistant Chief Data Officers (ACDOs), who reach out to people within their Mission Area working on AI to catalog efforts and review results for accuracy and consistency. One AI Inventory question asks whether the use case should be withheld from public disclosure and requests justification. Follow-up is conducted by Mission Area ACDOs and the CAIO with use case POCs to ensure thorough and complete information. Any use case deemed inappropriate for public release receives follow-up to ensure proper exclusion reasoning. Currently, use cases are only excluded from the public inventory for national security, scientific research not intended for USDA operations, or if the use case never reached development. While not currently included in the core AI inventory, USDA policies require inventorying research and development (R&D) use cases. If R&D cases are subsequently adopted for operations, they will be added to the core AI inventory.

3. FOSTERING PUBLIC TRUST IN FEDERAL USE OF AI

3A. DETERMINATIONS OF PRESUMED HIGH-IMPACT AI

The CAIO reviews all use cases in its AI inventory for identification as high-impact. The CAIO uses OMB guidance in M-25-21 and works with the business owner of the use case to determine if a high-impact designation is appropriate.

Waiver Criteria

USDA has not developed separate waiver criteria.

Waiver Process

Currently, the CAIO reviews all requests for AI use cases requiring application of minimum risk management practices. As needed, USDA will implement a form submission to issue, accept/reject, and track waivers per AI use case.

3B. IMPLEMENTATION OF RISK MANAGEMENT PRACTICES AND TERMINATION OF NON-COMPLIANT AI

Documentation and Validation

In Fiscal Year 2026, USDA continues to explore awarding a third-party AI product testing and validation contract to assist with compliance to minimum risk management practices. In the interim, the CAIO relies on evidence and testimonials from AI product leads to determine if minimum risk management practices are being met. USDA has representation on the Federal CAIO Council Minimum Risk Working Group. Based on that working group's work, the CAIO adjusts as new information, practices, and resources are identified. Mission Area ACDOs share responsibility with the CAIO on whether AI use cases meet minimum risk management practices, but the CAIO retains ultimate responsibility and accountability.

Controls to Prevent Non-Compliant Deployment

As a large federal organization, USDA operated a federated governance model in FY25 in domains such as IT and data. USDA has delegated some CAIO oversight duties to Mission Area Assistant Chief Data Officers (ACDOs). The ACDOs, acting as program ambassadors for their Mission Areas, serve as the first line of defense for AI governance. The USDA CAIO retains ultimate authority but relies on recommendations from ACDOs and the USDA CISO.

Additionally, USDA embraces "AI Red Teaming," having a separate team focus on circumventing AI guardrails before releasing AI products. This practice, utilizing volunteers from across USDA in various occupational disciplines, has identified numerous major and minor issues overlooked by traditional IT governance and testing. These findings have strengthened development teams to address issues earlier in the process, knowing their work requires clean findings from AI Red Team assessment. In Fiscal Year 2026, USDA plans to expand its AI Red Team practice and encourage smaller AI Red Team assessments at the agency level before engaging the USDA AI Red Team.

Termination Process

USDA has awarded a multi-vendor blanket ordering agreement called STRATUS for department-wide access to cloud service providers, cloud integration and development providers, and Software-as-a-Service (SaaS) providers and resellers. STRATUS gives USDA enhanced abilities to properly monitor cloud usage and spend, and implement "policy-as-code," where policies are defined, updated, shared, and enforced across the organization. The CAIO has implemented several "policy-as-code" actions for Generative AI-specific capabilities to ensure compliance with USDA's interim generative AI procedures. These policies can be scaled beyond Generative AI and beyond the STRATUS ordering agreement to provide a more holistic view of AI usage across USDA. Furthermore, the CAIO and CISO will continue working together if termination of non-compliant AI is required, including coordination with the CIO and USDA Deputy Secretary as needed.

In Fiscal Year 2025, the CAIO worked with other USDA leaders and the Office of Contracting and Procurement (OCP) to ensure updated procurement language for AI addressed components of M-25-22 such as data and AI ownership, intellectual property, and USDA AI standards. In Fiscal Year 2026, the CAIO and OCP will work together to refine language and ensure mission continuity while safeguarding data and intellectual property.