

U.S. AbilityOne Commission

Compliance Plan for OMB Memorandum M-25-21

“Accelerating Federal Use of AI through Innovation, Governance, and Public Trust”



September 29, 2025

I. Purpose

This compliance plan fulfills requirements of the April 3, 2025, Office of Management and Budget (OMB) Memorandum M-25-21, “Accelerating Federal Use of AI through Innovation, Governance, and Public Trust.”

II. Background

On January 23, 2025, President Trump signed Executive Order 14179, “Removing Barriers to American Leadership in Artificial Intelligence,” to advance the United States’ global AI dominance and to promote responsible AI innovation.

OMB subsequently issued Memorandum M-25-21, “Accelerating Federal Use of AI through Innovation, Governance, and Public Trust,” which directs Federal agencies to provide improved services to the public, while maintaining strong safeguards for civil rights, civil liberties, and privacy. The memorandum provides guidance to agencies on ways to promote human flourishing, economic competitiveness, and national security.

The U.S. AbilityOne Commission is the independent Federal agency that oversees the AbilityOne Program, which creates private sector jobs for people who are blind or have significant disabilities, while providing quality products and services to Federal customers at a fair market price. The U.S. AbilityOne Commission is the operating name for the agency, whose statutory name is the Committee for Purchase From People Who Are Blind or Severely Disabled.

The Commission administers the AbilityOne Program in accordance with the Javits-Wagner-O’Day (JWOD) Act.

III. Plan

1. Driving AI Innovation

Removing Barriers to the Responsible Use of AI

To mitigate or remove any barriers to the responsible use of AI, the Commission is planning to utilize Federal Risk and Authorization Management Program (FedRAMP) approved cloud-based services, thereby leveraging a standardized, reusable approach to security assessment and authorization for AI cloud service offerings and expediting Authority to Operate (ATO) approvals.

Additionally, the agency is planning to utilize Security, Development and Operations (SecDevOps) methodology during AI tool software development and management to maximize and integrate cybersecurity throughout the software system lifecycle.

Furthermore, in support of software development and management, the agency is planning to use Agile/Scrum methodology to expedite product delivery, allow for requirements adjustment, and incorporate continuous quality assurance and stakeholder feedback based on incremental development cycles.

Sharing and Reuse

The Commission is a micro-agency with a very small Information Technology (IT) department. Considering the agency's size and the limited resources/staffing of its IT department, which must develop and maintain most of its AI capabilities, the Commission plans to leverage a combined Data/AI Governance Body to internally coordinate and promote the sharing and reuse of AI code, models, and data assets. The "AI Governance Body" section below contains further details.

AI Talent

The Commission intends to incorporate AI understanding and expertise as one of the qualification requirements for its Chief Information Officer (CIO) position.

Additionally, based on funding availability and to expedite AI implementation, the Commission is planning to acquire necessary AI skillsets via existing IT contracts.

The agency is also planning to leverage the existing USDA AgLearn training and workforce development system, AI Community of Practice (CoP) training offerings, and publicly available training resources to cultivate internal AI talent.

2. Improving AI Governance

AI Governance Body

The Commission is planning to establish an internal Data/AI Governance Body that will oversee both Data and AI efforts and will, at a minimum, consist of the following members:

- Chief Information Officer (CIO)
- Chief Data Officer (CDO)
- Chief AI Officer (CAIO)
- Chief Information Security Officer (CISO)
- Chief of Staff (CoS)
- Office of General Counsel (OGC) representative
- AI Project Manager

To leverage existing IT infrastructure and services, the Data/AI Governance Body will consult regularly with current and other software vendors to understand available solutions that could be used in support of AI efforts.

Additionally, to coordinate and collaborate across the Federal Government, the Data/AI Governance Body will leverage, on an as-needed basis, the following councils, as well as relevant communities of practice and working groups:

- Federal Chief Artificial Intelligence Officers Council (CAIOC)
 - AI Community of Practice (CoP)
- Federal Chief Information Officers (CIO) Council
- The Small Agency Chief Information Officer Council (SACC)
- Federal Chief Data Officers' (CDO) Council
- The Small and Micro Agency CISO (SMAC) Council
- The Small Agency Council (SAC)

Agency Policies

By December 29, 2025, and in compliance with OMB Memorandum M-25-21, the Commission will review and, if deemed necessary, update internal policies (e.g., Enterprise Security Architecture Policy, Risk Assessment Policy, Vulnerability Disclosure Policy, Incident Response Policy, etc.) to include AI guidance.

Also by December 29, 2025, the Commission, as part of its Data/AI Governance Body tasker, will develop a Generative AI Policy. As part of Generative AI Policy development, the agency will develop a risk assessment plan, leveraging an existing Enterprise Risk Management (ERM) program, in alignment with OMB Memorandum M-25-21, Section 7, "Methods of Understanding AI Risk Management," to identify any potential risks relevant to generative AI use and develop corresponding adequate safeguards and mitigation plans.

AI Use Case Inventory

The agency is planning to utilize its Data/AI Governance Body to collect and inventory potential AI use cases from agency departments. The AI use cases inventory, and corresponding risk management activities, will be tracked within the agency's internal AI Use Cases dashboard, which will be reviewed and (if necessary) updated on a regular basis by the Data/AI Governance Body.

3. Fostering Public Trust in Federal Use of AI

Determinations of Presumed High-Impact AI

The Commission is planning to utilize its Data/AI Governance Body to determine which AI use cases are high-impact, using the definition of high-impact AI and list of high-impact categories in OMB Memorandum M-25-21, Section 5, “Definitions,” and Section 6, “Purposes for which AI is Presumed to be High-Impact.”

Furthermore, in compliance with OMB Memorandum M-25-21, Section 4, Sub-sections a.ii-a.iv (“Authorizing Waivers from Minimum Practices for High-Impact AI,” “Tracking Waivers from Minimum Practices for High-Impact AI,” and “Publicly Reporting Determinations and Waivers”), the Commission is planning to leverage its Data/AI Governance Body and establish a procedure to review, process, reassess on annual basis, track, and report any waivers for minimum risk management practices.

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

The Commission is planning to leverage an existing Enterprise Risk Management (ERM) program to identify, evaluate, mitigate and manage AI-relevant risks.

In accordance with OMB Memorandum M-25-21, Section 4, Sub-section b, “Implementing Minimum Risk Management Practices for High-Impact AI,” the Commission is planning to leverage its Data/AI Governance Body to designate a Project Manager for each of the High-Impact AI projects. The Project Manager will be responsible for implementation and oversight, conducting pre-deployment testing, and preparing risk mitigation plans.

To prevent non-compliant high-impact AI from being deployed to the public, the Commission is planning to complete pre-deployment initial AI impact assessments and periodically update those assessments throughout the AI’s lifecycle. Additionally, the Commission is planning to conduct continuous AI monitoring for performance and potential adverse impacts.

If any adverse impacts are found, or non-compliant AI determination is made, the Commission’s Data/AI Governance Body will review the findings and make the final termination decision.