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Report to Congressional Addressees

September 2024

ARTIFICIAL INTELLIGENCE

Agencies Are Implementing Management and Personnel Requirements

GAO-24-107332

GAO Highlights

Highlights of GAO-24-107332, a report to congressional addressees

September 2024

ARTIFICIAL INTELLIGENCE

Agencies Are Implementing Management and Personnel Requirements

Why GAO Did This Study

AI is rapidly changing the world and has significant potential to transform society and people's lives. According to the Administration, agencies are already using AI operationally in various areas. Further, agencies have requested $1.9 billion for research and development investment in AI for fiscal year 2024. Given the rapid growth in capabilities and widespread adoption of AI, the federal government must responsibly manage its use.

To help guide a coordinated, government-wide approach to the development and safe and responsible use of AI, the President issued an Executive Order in October 2023. Among other things, the order requires agencies to provide guidance for AI management and to increase AI talent in the government.

GAO's objective was to evaluate the extent to which agencies have implemented selected AI management and talent requirements from Executive Order 14110. GAO selected 13 requirements from the order that (1) were due by the end of March 2024, (2) had government-wide implications for AI management and talent, and (3) had clear deliverables. For these 13 requirements, GAO assessed agency documentation and interviewed relevant officials.

GAO provided a draft of this report to EOP, OMB, OPM, OSTP, and GSA for review. OMB and OSTP provided technical comments, which we incorporated as appropriate. EOP, OPM, and GSA did not have any comments on the report.

View GAO-24-107332. For more information, contact Kevin Walsh at (202) 512-6151 or walshk@gao.gov.

What GAO Found

Federal agencies have taken actions to implement selected artificial intelligence (AI) management and talent requirements that were due by the end of March 2024. Specifically, all 13 of the selected AI management and talent requirements contained in the relevant Executive Order were fully implemented (see table).

Extent to Which Agencies Implemented Selected Artificial Intelligence (AI) Management and Talent Requirements from Executive Order (EO) 14110, as of June 2024

Responsible agency(ies)	GAO assessment of selected requirements
Executive Office of the President	● Organize the AI and Technology Talent Task Force ● Establish the White House AI Council
Office of Management and Budget (OMB)	● Convene the interagency Chief AI Officer council ● Issue AI guidance to agencies ● Issue instructions on agencies' AI use cases
Office of Science and Technology Policy and OMB	● Identify priority mission areas for increasing AI talent, establish highest-priority types of talent, and identify pathways for an accelerated hiring process
General Services Administration (GSA)	● Publish a Federal Risk and Authorization Management Program framework ● The Technology Modernization Board should consider prioritizing AI projects
Office of Personnel Management (OPM)	● Review hiring and workplace flexibilities ● Consider excepted service appointments ● Coordinate AI hiring action across agencies ● Issue guidance on AI-related pay
OMB/ U.S. Digital Service, OPM, GSA/ U.S. Digital Corps and Presidential Innovation Fellows	● Establish initial plans for recruiting AI talent

Legend: ● Fully implemented = agency evidence fully satisfied the requirement.

Source: GAO analysis of agency efforts to implement key AI requirements. | GAO-24-107332

As required by the order, the Executive Office of the President (EOP) organized the AI and Technology Talent Task Force and established the White House AI Council. The Office of Management and Budget (OMB) has convened and chaired the Chief AI Officer council, issued AI guidance and use case instructions to agencies, and established initial plans for AI talent recruitment. The Office of Personnel Management (OPM) has reviewed hiring and workplace flexibility, considered excepted service appointments, coordinated AI hiring action across federal agencies, and issued related pay guidance. In addition, the Office of Science and Technology Policy (OSTP) and OMB have identified priority mission areas for increasing AI talent, established the types of talent that are the highest priority to recruit and develop, and identified accelerated hiring pathways.

Regarding AI and emerging technologies, the General Services Administration (GSA) finalized and issued its framework on June 27, 2024. The framework is to enable consistent prioritization of the most critical emerging technologies in a secure cloud environment. As discussed in this report, GSA's initial priority list has three generative AI capabilities: chat interfaces, code-generation and debugging tools, and prompt-based image generators.

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Abbreviations

AI	artificial intelligence
CFO	Chief Financial Officer
CDO	Chief Data Officer
CIO	Chief Information Officer
EOP	Executive Office of the President
EO	executive order
GSA	General Services Administration
NAII	National Artificial Intelligence Initiative
NITRD	Networking and Information Technology Research and Development
NSTC	National Science and Technology Council
OMB	Office of Management and Budget
OPM	Office of Personnel Management
OSTP	Office of Science and Technology Policy
PIF	Presidential Innovation Fellows
R&D	research and development
USDS	U.S. Digital Service

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE
441 G St. N.W.
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September 9, 2024

Congressional Addressees

Artificial intelligence (AI) is rapidly changing our world and has significant potential to transform society and people's lives.[1] According to the Executive Office of the President (EOP), responsible use of AI has the potential to help solve urgent challenges while making our world more prosperous, productive, innovative, and secure. In addition, AI holds substantial promise for improving the operations of government agencies. However, irresponsible use could exacerbate societal harms such as fraud, discrimination, bias, and disinformation; displace and disempower workers; stifle competition; and pose risks to national security.[2]

According to the Administration, agencies are already using AI operationally in various areas, including analyzing weather hazards, processing veteran feedback, searching for patent documentation, delivering benefits, combating fraud, identifying information security threats, and facilitating the review of large datasets.[3] Agencies have requested $1.9 billion for research and development investment in AI for fiscal year 2024.[4]

Given the rapid growth in capabilities and widespread adoption of AI, the federal government must manage its use of AI in a responsible way to minimize risk, achieve intended outcomes, and avoid unintended consequences. To help guide a coordinated government-wide approach

[1]The White House, Office of Science and Technology Policy (OSTP), *American Artificial Intelligence Initiative: Year One Annual Report*, (Washington, D.C.: Feb. 2020) and GAO, *Artificial Intelligence: Status of Developing and Acquiring Capabilities for Weapon* Systems, GAO-22-104765 (Washington, D.C.: Feb. 17, 2022).

[2]Exec. Order 14110, *Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence* (Oct. 30, 2023).

[3]"AI.gov," The White House, accessed 6/27/2024, https://ai.gov/ai-use-cases/; and Exec. Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government* (Dec. 3, 2020).

[4]National Science and Technology Council, The Networking & Information Technology R&D Program and the National Artificial Intelligence Initiative Office, *Supplement to the President's FY 2024 Budget: A Report by the Subcommittee on Networking and Information Technology Research and Development and the Machine Learning and Artificial Intelligence Subcommittee of the National Science and Technology Council*, (Washington, D.C.: Nov. 16, 2023).

to the development and safe and responsible use of AI, the President issued Executive Order (EO) 14110 in October 2023.[5] Among other things, the EO requires certain agencies to provide guidance for AI management and increase AI talent in the government.

We performed this work under the statutory authority of the Comptroller General to initiate work to assist Congress with its evaluation of programs and activities of the government under existing law, in this case the implementation of government-wide AI requirements.[6] Our objective was to evaluate the extent to which agencies have implemented selected AI management and talent requirements from EO 14110.

To address the objective, we identified key AI requirements in EO 14110, *Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence*.[7] We selected requirements that (1) were due within 150 days of the issuance of the EO (by the end of March 2024), (2) had government-wide implications for AI management and talent, and (3) had clear deliverables. Based on our review of this information, we identified 13 requirements from the following sections of EO 14110:

- §10.1 Providing Guidance for AI Management,
- §10.2 Increasing AI Talent in Government, and
- §12 Implementation.

The requirements assigned various responsibilities to the EOP, Office of Management and Budget (OMB), Office of Personnel Management (OPM), Office of Science and Technology Policy (OSTP), General Services Administration (GSA), U.S. Digital Corps, U.S. Digital Service (USDS), and Presidential Innovation Fellows (PIF).[8]

We assessed documentation from these offices and agencies (agencies), such as draft guidance for AI inventory reporting, memorandums, and presidential fact sheets. We then compared the documentation against

[5]Exec. Order 14110, *Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence* (Oct. 30, 2023).

[6]31 U.S.C. § 717(b)(1).

[7]Exec. Order 14110, *Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence* (Oct. 30, 2023).

[8]OMB and OSTP are offices within the EOP. USDS is an office within OMB. The U.S. Digital Corps and Presidential Innovation Fellows are program offices within GSA.

the selected requirements to determine the extent to which agencies are meeting the requirements. For each selected requirement, we considered a requirement to be fully implemented if an agency provided evidence that fully satisfied the requirement. We considered a requirement to be partially implemented if an agency provided evidence that satisfied some, but not all, of the requirement. Lastly, we considered a requirement to not be implemented if an agency did not provide evidence that satisfied any of the requirement.

In addition, we met with relevant officials at the agencies to obtain additional information on agency efforts to comply with AI federal policy. Additional details about our objective, scope, and methodology are discussed in appendix I.

We conducted this performance audit from January 2024 to September 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

AI involves computing systems that "learn" how to improve their performance; it is a rapidly growing transformative technology with applications found in every aspect of modern life. AI is used in day-to-day technologies such as video games, web searching, facial recognition technology, spam filtering, and voice recognition. It has applications in business and commerce, agriculture, transportation, and medicine, among other societal areas.

AI Definitions Vary

AI capabilities are rapidly evolving, but neither the scientific community nor industry agree on a common definition for these technologies. Even within the government, definitions vary. For example, two separate federal statutes enacted in the last few years have different definitions of AI. Specifically, Congress included one definition of AI in the John S. McCain National Defense Authorization Act for Fiscal Year 2019 and a

different definition in the National Artificial Intelligence Initiative Act of 2020.[9]

Legislative and Executive Actions Guide AI Implementation and Responsibilities

Federal agencies' efforts to implement AI have been guided by a variety of legislative and executive actions, as well as federal guidance. The President has issued EOs and Congress has enacted legislation to assist agencies in implementing AI in the federal government. For example,

- In February 2019, the President issued EO 13859, establishing the American AI Initiative, which promoted AI research and development investment and coordination, among other things.[10]
- In December 2020, the President issued EO 13960, promoting the use of trustworthy AI, which focused on operational AI and established a common set of principles for the design, development, acquisition, and use of AI in the federal government.[11]
- In December 2020, the AI in Government Act of 2020 was enacted as part of the Consolidated Appropriations Act, 2021 to ensure that the use of AI across the federal government is effective, ethical, and accountable by providing resources and guidance to federal agencies.[12]
- In October 2023, the President issued EO 14110 which aims to advance a coordinated, federal government-wide approach to the development and safe and responsible use of AI.[13] More details on this EO are provided in the next section.
- In December 2022, the Advancing American AI Act was enacted as part of the James M. Inhofe National Defense Authorization Act for

[9]EO 14110 uses the definition of AI provided in the National Artificial Intelligence Initiative Act of 2020. National Artificial Intelligence Initiative Act of 2020, Division E of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-283, Div. E, § 5002(3), 134 Stat. 3388, 4524 (2021) (codified in relevant part at 15 U.S.C. § 9401(3)).

[10]Exec. Order 13859, *Maintaining American Leadership in Artificial Intelligence* (Feb. 11, 2019).

[11]Exec. Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government* (Dec. 3, 2020).

[12]AI in Government Act of 2020, Division U, Title I of the Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, Div. U, Title I, 134 Stat. 1182, 2286-89 (2020) (40 U.S.C. § 11301 note).

[13]Exec. Order 14110, *Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence* (Oct. 30, 2023).

Fiscal Year 2023 to encourage agency AI-related programs and initiatives; promote adoption of modernized business practices and advanced technologies across the federal government; and test and harness applied AI to enhance mission effectiveness, among other things.[14]

- In March 2024, OMB issued a memorandum that directs federal agencies to advance AI governance and innovation while managing risks from the use of AI in the federal government.[15] We discuss this guidance in more detail later in the report.
- Most recently, in May 2024, the Bipartisan Senate AI Working Group issued a Senate AI policy roadmap, Driving U.S. Innovation in Artificial Intelligence, which was developed to serve as a roadmap for AI policy in the U.S. Senate.[16]

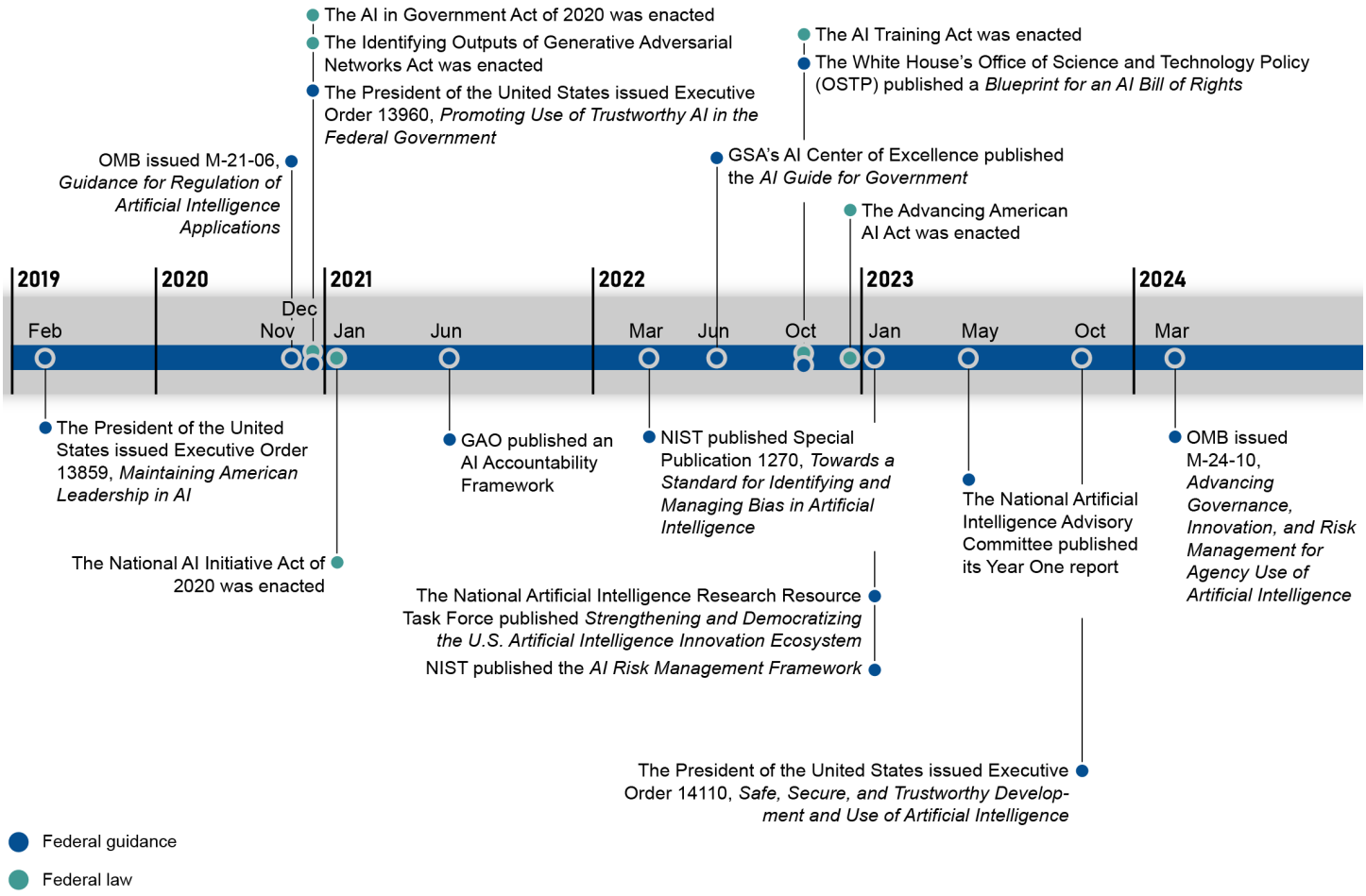
Figure 1 provides a timeline of key federal laws, EOs, and federal guidance released over the past 4 years to advance and manage AI.

[14]James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, div. G, title LXXII, subtitle B, §§7221-7228, 136 Stat. 3668-3676 (2022) (codified at 40 U.S.C. § 11301 note).

[15]OMB, *Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence*, M-24-10 (Washington, D.C.: Mar. 28, 2024).

[16]The Bipartisan Senate AI Working Group, *Driving U.S. Innovation in Artificial Intelligence: A Roadmap for Artificial Intelligence Policy in the United States Senate* (Washington, D.C.: May 15, 2024).

Figure 1: Timeline of Federal Efforts to Advance Artificial Intelligence



(AI) artificial intelligence, OMB (Office of Management and Budget), NIST (National Institute of Standards and Technology), GSA (General Services Administration)

Source: GAO analysis of federal guidance and legislation on AI. | GAO-24-107332

EO 14110 Includes Over 100 Requirements for Federal Agencies

As previously stated, EO 14110, issued in October 2023, is intended to advance and govern the development and use of AI in accordance with eight guiding principles and priorities. These principles and priorities are:

1. Ensuring the Safety and Security of AI Technology
2. Promoting Innovation and Competition
3. Supporting Workers
4. Advancing Equity and Civil Rights

5. Protecting Consumers, Patients, Passengers, and Students
6. Protecting Privacy
7. Advancing Federal Government Use of AI
8. Strengthening American Leadership Abroad

The EO includes more than 100 requirements for federal agencies to address these principles and priorities. Many requirements, but not all, include due dates for completion, ranging from 30 days to 540 days after the issuance of the EO. In particular, sections 10 and 12 of the EO describe requirements for agencies that are to assist in providing guidance for AI management, increasing AI talent in the government, and implementing the EO. Six offices and agencies (hereafter called agencies) are responsible for implementing these requirements. The agencies include EOP, OMB, OPM, OSTP, GSA, and USDS. Table 1 describes selected AI requirements identified within EO 14110 that were due within 150 days after the issuance of the EO and have government-wide implications for AI management and talent.

Table 1: Selected Artificial Intelligence (AI) Management and Talent Requirements within Executive Order (EO) 14110

Section title	Requirement summary	Responsible agency	Due date
§10.1 Providing Guidance for AI Management	Convene and chair an interagency council to coordinate the development and use of AI in agencies' programs and operations (excluding the use of AI in national security systems).	Office of Management and Budget (OMB)	December 2023
	Issue guidance to agencies to strengthen the effective and appropriate use of AI, advance AI innovation, and manage risks from AI in the federal government.	OMB	March 2024
	Issue instructions for the tracking and public reporting of AI use cases.	OMB	N/A
	Develop and issue a framework for prioritizing critical and emerging technology in the Federal Risk and Authorization Management Program (FedRAMP).	General Services Administration (GSA)	January 2024
	Consider prioritizing funding for AI projects for at least 1 year.	GSA/ Technology Modernization Board	November 2023
§10.2 Increasing AI Talent in Government	Identify priority mission areas for increased government AI talent, the types of talent that are highest priority to recruit and develop, and accelerated hiring pathways.	Office of Science and Technology Policy (OSTP) and OMB	December 2023
	Convene an AI and Technology Talent Task Force.	Assistant to the President and Deputy Chief of Staff for Policy	December 2023

Section title	Requirement summary	Responsible agency	Due date
	Develop and implement plans to support rapid recruitment of AI talent.	OMB/ U.S. Digital Service, Office of Personnel Management (OPM), and GSA/ U.S. Digital Corps and Presidential Innovation Fellows	December 2023
	Review the need for hiring and workplace flexibilities.	OPM	December 2023
	Consider authorizing the use of excepted service appointments.	OPM	December 2023
	Coordinate a pooled-hiring action to recruit AI talent across agencies.	OPM	January 2024
	Issue guidance related to pay flexibilities and incentives for AI.	OPM	February 2024
§12 Implementation	Establish, within the Executive Office of the President, the White House AI Council.	Executive Office of the President	N/A

Source: GAO analysis of key requirements from EO 14110. | GAO-24-107332

Multiple Oversight and Advisory Bodies Coordinate Federal AI Efforts

Seven oversight and advisory bodies have a major role in the implementation and oversight of AI that were established through EOs, federal laws, and White House charters. Table 2 describes how each body was established, its position within the federal government, membership, and the role(s) it has in the implementation of AI in the federal government.

Table 2: Key Oversight and Advisory Bodies That Coordinate Artificial Intelligence (AI) Efforts

Oversight or advisory body	Description
White House AI Council	• Established in October 2023 by Executive Order (EO) 14110. • Located within the Executive Office of the President (EOP). • Consists of top officials from a wide range of federal departments and agencies. • Coordinates the activities of agencies across the federal government to ensure the effective formulation, development, communication, industry engagement related to, and timely implementation of AI-related policies.

Oversight or advisory body	Description

National AI Advisory Committee (NAIAC)	• Mandated by the National Artificial Intelligence Initiative (NAII) Act of 2020, the Secretary of Commerce, in consultation with the Director of the Office of Science and Technology Policy (OSTP); the Attorney General; the Secretaries of Defense, Energy, and State; and the Director of National Intelligence, established in April 2022.
	• Members include leaders with a broad and interdisciplinary range of AI-relevant expertise from across academia, non-profits, civil society, and the private sector.
	• Advises the President and National Artificial Intelligence Initiative Office on topics related to the initiative.
	• Directed by Congress to provide recommendations on topics including:
	  • current state of U.S. AI competitiveness,
	  • progress in implementing the initiative,
	  • the state of science around AI,
	  • issues related to AI workforce, and
	  • how to leverage initiative resources and updates to the initiative.

National Artificial Intelligence Initiative Office	• Mandated by the NAII Act of 2020 and established in January 2021.
	• Located within OSTP.
	• Staffed by an appointed director (currently held by the Principal Deputy U.S. Chief Technology Officer) and additional staff, including staff detailed from the federal departments and agencies.
	• Tasked with:
	  • providing technical and administrative support to the Select Committee on AI and the National AI Advisory Committee;
	  • overseeing interagency coordination of the National Artificial Intelligence Institute;
	  • serving as the central point of contact for technical and programmatic information exchange on activities related to the AI initiative across federal agencies, industry, academia, nonprofit organizations, professional societies, state and tribal governments, and others; and
	  • conducting regular public outreach to diverse stakeholders and promoting access to technologies, innovations, best practices, and expertise derived from initiative activities to agency missions and systems across the federal government.

Networking and Information Technology Research and Development (NITRD)'s AI R&D Interagency Working Group	• Formed in July 2018 to coordinate federal AI research and development across 32 participating agencies and support activities tasked by both the Select Committee on AI and the Machine Learning and AI subcommittee. • Located within the NITRD Program. • Through the NITRD Subcommittee, the working group coordinates AI activities to advance the mission of the National Artificial Intelligence Research and Development Strategic Plan.

Oversight or advisory body	Description

Select Committee on AI	• Established in June 2018 by the White House.
	• Located within OSTP, under National Science and Technology Council (NSTC) which advises the President on science and technology.
	• Co-chaired by the Director of OSTP, and on an annually rotating basis, a representative from the Department of Commerce, the National Science Foundation, or the Department of Energy.
	• Serves as the interagency AI body overseeing the NAII and was rechartered in 2021 in alignment with NAII Act of 2020.
	• Responsibilities include:
	  • providing interagency coordination of federal AI research and development (R&D) and education activities;
	  • developing a strategic plan for AI;
	  • encouraging agency programs and initiatives for AI R&D and education that enhances competitiveness and job creation and that address societal issues related to AI;
	  • identifying opportunities to improve access to high-quality datasets and computation infrastructure for AI R&D;
	  • facilitating the coordination of that National AI Research Institutes; and
	  • identifying opportunities to collaborate on AI with academia, industry, civil society, and international allies, and annually propose and report on a coordinated interagency budget for the initiative.
	• Includes a Machine Learning and AI subcommittee which serves as the operations and implementation arm of the Select Committee.

President's Council of Advisors on Science and Technology	• Established in January 2021 by EO 14007, *President's Council of Advisors on Science and Technology*. • Members include scientists, engineers, and health experts, among others, from outside of the federal government. • Advises the President and develops recommendations on science, technology, and innovation policy, as well as scientific and technological matters that inform policy affecting the economy, worker empowerment, education, energy, the environment, public health, national and homeland security, and racial equity.
NSTC	• Established in November 1993 by EO 12881, *Establishment of the National Science and Technology Council*. • Located within OSTP. • Members include the Vice President, the Director of OSTP, cabinet secretaries and agency heads with significant science and technology responsibilities, and heads of other White House offices. • Advises the President on science and technology and has multiple functions under six primary committees and two special committees, including the Select Committee on AI. • Oversees the Select Committee on AI and the Committee on Science and Technology Enterprise.

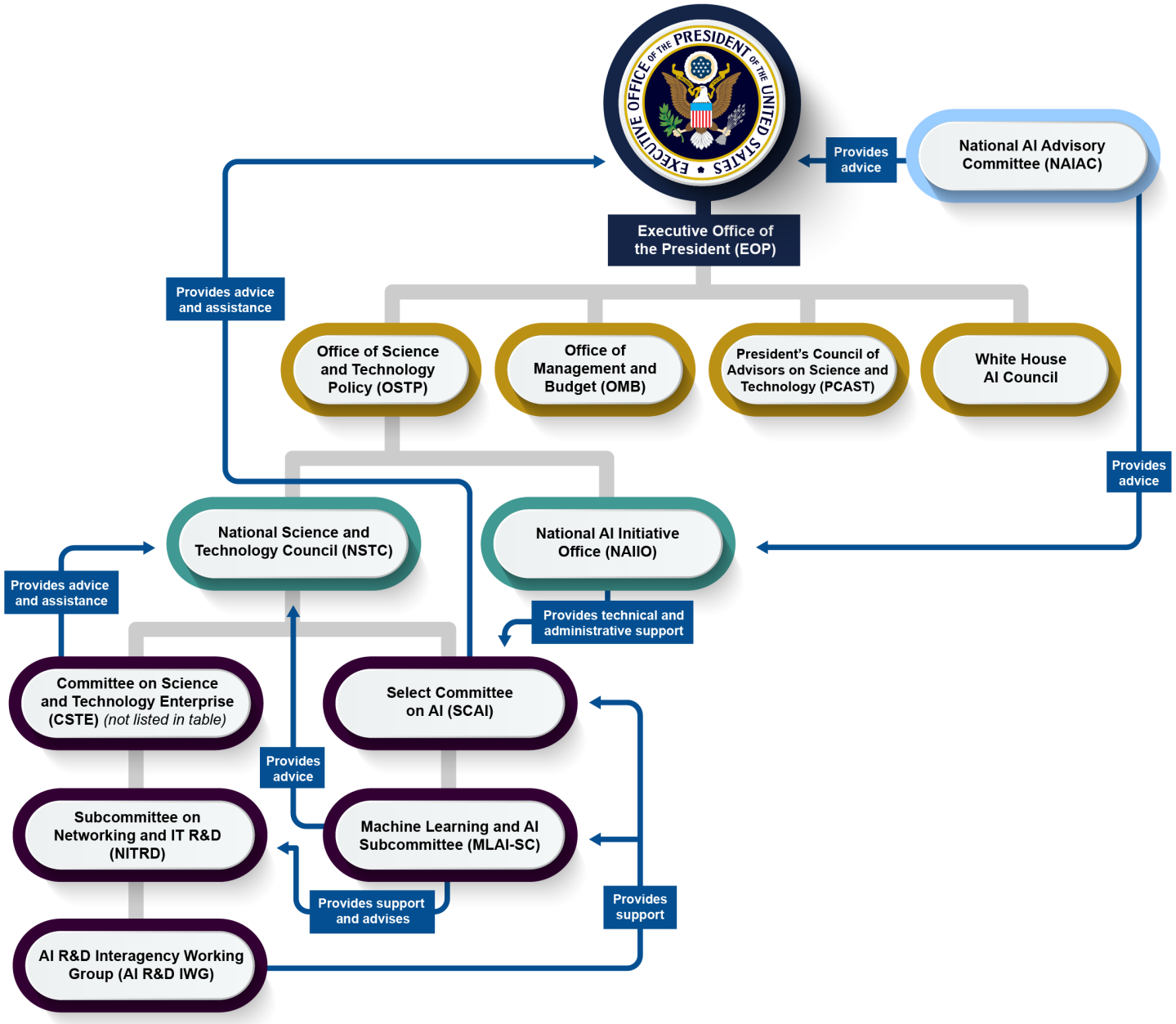
Source: GAO analysis of federal AI oversight and advisory bodies. | GAO-24-107332

The oversight and advisory bodies are to coordinate with one another to establish guidance, oversight, and support for the implementation of AI in the federal government.

- The EOP is the central point of coordination for multiple oversight bodies. The National AI Research Resource Task Force and the National AI Advisory Committee provide advice to the EOP.
- Located within the EOP, the White House AI Council, OSTP, and OMB also have roles and responsibilities regarding AI. For example, OSTP houses additional oversight and advisory bodies such as the National Artificial Intelligence Initiative Office and the National Science and Technology Council (NSTC). In addition, NSTC oversees the Select Committee on AI and the Committee on Science and Technology Enterprise.
- Several bodies provide support and assistance to other bodies. For example, the National Artificial Intelligence Initiative Office provides technical and administrative support to the NSTC's Select Committee on AI.

See figure 2 for a depiction of the oversight and advisory bodies that coordinate AI efforts.

Figure 2: Key Oversight and Advisory Bodies That Coordinate Artificial Intelligence (AI) Efforts



Sources: GAO (analysis); EOP (logo); abert84/stock.adobe.com (icons). | GAO-24-107332

GAO Issued a Framework for AI Management and Reported on Opportunities to Improve AI Governance

Recognizing the increasing importance and usage of AI, in June 2021, we published a framework to help managers ensure accountability and the responsible use of AI in government programs and processes.[17] The framework describes four principles—governance, data, performance, and monitoring—and associated key practices to consider when implementing AI systems. Each of the practices contains a set of questions and procedures for auditors and third-party assessors to consider when reviewing efforts related to AI.

In addition, we have reported on agencies' use of AI and provided recommendations to improve AI oversight. For example:

- In March 2022, we reported that the Department of Defense's (DOD) AI strategy and plans included some characteristics of a comprehensive strategy.[18] We noted that the department lacked a high-level plan or roadmap to address limitations in developing a comprehensive AI inventory. We also noted that while DOD collaborated on AI activities, the department did not fully incorporate leading collaboration practices in its AI activities. We made seven recommendations to the department, including to develop a high-level plan for its AI inventory processes, issue guidance to include all characteristics of a comprehensive strategy, and finalize guidance and agreements that define roles and responsibilities for AI collaboration. DOD concurred with each of the recommendations and had implemented one of them as of August 2024. In particular, DOD developed and issued a memorandum to establish common terminology for DOD AI related activities.[19]
- In June 2023, we reported that although numerous entities across DOD were acquiring, developing, or already using AI, the department had not issued department-wide guidance for how its components should approach acquiring AI.[20] We noted that various DOD components had individually developed or planned to develop their own informal AI acquisition resources, some of which reflected key

[17]GAO, *Artificial Intelligence: An Accountability Framework for Federal Agencies and Other Entities,* GAO-21-519SP (Washington, D.C.: June 30, 2021).

[18]GAO, *Artificial Intelligence: DOD Should Improve Strategies, Inventory Process, and Collaboration Guidance,* GAO-22-105834 (Washington, D.C.: Mar. 30, 2022).

[19]DOD, *Data Analytics and Artificial Intelligence Lexicon Memorandum* (Washington, D.C.: Sept. 1, 2023).

[20]GAO, *Artificial Intelligence: DOD Needs Department-Wide Guidance to Inform Acquisitions,* GAO-23-105850 (Washington, D.C.: June 29, 2023).

factors identified by private companies for AI acquisition. At the time, the department was in the process of planning to develop such guidance, but it had not defined concrete plans and had no timeline to do so. We made one recommendation to the department and three additional recommendations to the military services (Army, Navy, and Air Force) to develop guidance on acquiring AI capabilities, leveraging private company factors. DOD concurred with each of the recommendations; however, as of August 2024, it had not yet implemented the recommendations.

- In December 2023, we reported that agency AI inventories included about 1,200 current and planned AI use cases.[21] In addition, we reported that although most agencies developed an AI inventory, there were instances of incomplete and inaccurate data. We also noted that federal agencies had taken initial steps to comply with AI requirements in executive orders and federal law; however, more work remained to fully implement those requirements. For example, OMB had not developed the required guidance for the agencies' acquisition and use of AI technologies. In addition, we found that although many agencies utilized AI, several had not developed a plan for AI inventory updates and compliance with an EO promoting the use of trustworthy AI in the federal government.[22] Further, agencies were unable to implement a requirement to develop plans to achieve consistency with OMB's guidance on the acquisition and use of AI, since OMB had not yet issued that guidance.

  We made 35 recommendations to 19 agencies, including OMB, to fully implement federal AI requirements. Ten agencies agreed with their recommendations, three agencies partially agreed with one or more recommendations, four agencies neither agreed nor disagreed, and two agencies did not agree with one of their recommendations. As of August 2024, three agencies (OMB, OPM, and the Department of Transportation) had implemented four recommendations. In particular, EO 14110 included a public roadmap for OMB's March 2024 guidance that supports the use of AI.[23] OPM created an inventory of federal rotational programs and determined how the

[21]GAO, *Artificial Intelligence: Agencies Have Begun Implementation but Need to Complete Key Requirements*, GAO-24-105980 (Washington, D.C.: Dec. 12, 2023). According to GSA, an AI use case is a specific challenge or opportunity that AI may solve.

[22]Exec. Order 13960, *Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government* (Dec. 3, 2020).

[23]OMB, *Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence*, M-24-10 (Washington, D.C.: Mar. 28, 2024).

programs could help expand the number of employees with AI expertise. OPM also issued a related report with recommendations on expanding AI expertise and shared it with interagency coordination bodies. In addition, the Department of Transportation developed and submitted to OMB its plans to achieve consistency with OMB guidance. The remaining 16 agencies have not yet implemented their recommendations.

- In December 2023, we reported that DOD used a variety of tools to recruit AI personnel including direct hiring, special pay, and direct commissioning authorities.[24] We noted that DOD had taken steps to begin to identify its AI workforce, but had not assigned responsibility and did not have a timeline for completing additional steps to fully define and identify this workforce. Further, we reported that DOD had published plans and strategies intended to support the department's strategic goals and objectives, including those that addressed AI workforce issues. However, those plans were not consistent with one another. We made three recommendations for the department to (1) assign responsibility for completing the additional steps to define and identify its AI workforce; (2) establish a timeline for completing the additional steps to define and identify its AI workforce; and (3) update its Human Capital Operating Plan to be consistent with key department strategic documents related to AI workforce issues. DOD partially concurred with the recommendations. As of August 2024, it had not yet implemented the recommendations.
- In February 2024, we reported that DHS's inventory of AI use cases for cybersecurity was not accurate and that the agency had not taken steps to verify that all items listed in the inventory as use cases were AI.[25] In addition, we noted that DHS had implemented four of 11 key practices from our AI Accountability Framework. We made eight recommendations to DHS related to ensuring accurate reporting of its AI inventory and to fully implement key AI Accountability Framework practices. DHS concurred with the recommendations and has plans to address them.

[24]GAO, *Artificial Intelligence: Actions Needed to Improve DOD's Workforce Management*, GAO-24-105645 (Washington, D.C.: Dec. 14, 2023).

[25]GAO, *Artificial Intelligence: Fully Implementing Key Practices Could Help DHS Ensure Responsible Use for Cybersecurity*, GAO-24-106246 (Washington, D.C.: Feb. 7, 2024).

Agencies Have Implemented AI Management and Talent Requirements

Federal agencies have taken actions to implement the selected management and talent requirements outlined in EO 14110 that were due by the end of March 2024. Table 3 shows the extent to which agencies had implemented selected AI management and talent requirements from EO 14110, as of June 2024.

Table 3: Extent to Which Agencies Implemented Selected Artificial Intelligence (AI) Management and Talent Requirements from Executive Order 14110, as of June 2024

Responsible agency(ies)	GAO assessment of selected requirements
Executive Office of the President (EOP)	Fully implemented. ● Organize the AI and Technology Talent Task Force ● Establish the White House AI Council
Office of Management and Budget (OMB)	Fully implemented. ● Convene the interagency Chief AI Officer council ● Issue AI guidance to agencies ● Issue instructions on agencies' AI use cases
Office of Science and Technology Policy (OSTP) and OMB	Fully implemented. ● Identify priority mission areas for increasing AI talent, establish highest-priority types of talent, and identify pathways for an accelerated hiring process
General Services Administration (GSA)	Fully implemented. ● Publish a Federal Risk and Authorization Management Program (FedRAMP) framework ● The Technology Modernization Board should consider prioritizing AI projects
Office of Personnel Management (OPM)	Fully implemented. ● Review hiring and workplace flexibilities ● Consider excepted service appointments ● Coordinate AI hiring action across agencies ● Issue guidance on AI-related pay
OMB/ U.S. Digital Service, OPM, GSA/ U.S. Digital Corps and Presidential Innovation Fellows	Fully implemented. ● Establish initial plans for recruiting AI talent

Legend: ● Fully implemented = agency evidence fully satisfied the requirement.

Source: GAO analysis of EOP, OMB, OSTP, GSA, and OPM efforts to implement key AI requirements. | GAO-24-107332

EOP Organized a Task Force for AI and Technology Talent and Established a White House AI Council

EOP and its Office of the White House Chief of Staff are responsible for coordinating the implementation of EO 14110 requirements, among other things. EOP fully implemented the two selected requirements for organizing the AI and Technology Talent Task Force and establishing the White House AI Council. Table 4 shows the extent to which EOP had implemented key AI management and talent requirements from EO 14110, as of June 2024.

Table 4: Extent to Which the Executive Office of the President (EOP) Implemented Key Artificial Intelligence (AI) Management and Talent Requirements from Executive Order (EO) 14110, as of June 2024

Requirement	GAO assessment of selected requirements
Convene an AI and Technology Talent Task Force that is to accelerate and track the hiring of AI and AI-enabling talent across the federal government.	● Fully implemented. On November 17, 2023, EOP/ the White House Deputy Chief of Staff convened the AI and Technology Talent Task Force with leaders of various federal agencies and councils to expedite and track the hiring of AI talent.
Establish, within the EOP, the White House AI Council. The function of the White House AI Council is to coordinate the activities of agencies across the federal government to ensure the effective formulation, development, communication, industry engagement related to, and timely implementation of AI-related policies, including policies set forth in this order.	● Fully implemented. With the issuance of the EO, EOP/ the White House Deputy Chief of Staff established the White House AI Council within the EOP to coordinate agencies' activities across the federal government as required.

Legend: ● Fully implemented = agency evidence fully satisfied the requirement.

Source: GAO analysis of EOP efforts to implement key AI requirements. | GAO-24-107332

According to EOP, OMB, and OSTP officials, the Assistant to the President organized the AI and Technology Talent Task Force and held the first meeting in November 2023. Officials stated that the task force initially met on a weekly basis and has met monthly since February 2024. According to OMB, the task force includes leadership from OSTP, OMB, the Office of the National Cyber Director, Office of Presidential Personnel, GSA Technology Transformation Services, and representatives from the Chief Human Capital Officer Council and Chief Data Officer Council. Officials also stated that the task force played a significant role in streamlining hiring procedures, which officials attributed to a substantial increase in federal AI job applicants. EOP expects at least 100 new federal AI staff to be hired by summer 2024.

Similarly, EOP officials stated that the White House AI Council was established in October 2023, concurrent with the issuance of EO 14110. Those officials stated that the council has met approximately every 4 to 6 weeks since then.

As a result of EOP organizing the AI and Technology Talent Task Force and establishing the White House AI Council, the federal government is better positioned to increase its AI workforce, effectively coordinate AI activities across agencies, and implement consistent and timely AI-related policies.

OMB Organized the Chief AI Officer Council and Issued AI Guidance and Instructions to Agencies

The EO gives OMB the responsibility to issue critical guidance on federal agencies' management and use of AI. OMB implemented three selected requirements on convening the interagency Chief AI Officer Council, issuing AI guidance to agencies, and issuing instructions on agencies' AI use cases. Table 5 shows the extent to which OMB had implemented key AI management requirements from EO 14110, as of June 2024.

Table 5: Extent to Which the Office of Management and Budget (OMB) Implemented Key Artificial Intelligence (AI) Management Requirements from Executive Order (EO) 14110, as of June 2024

Requirement	GAO assessment of selected requirements
Convene and chair an interagency council to coordinate the development and use of AI in agencies' programs and operations, other than the use of AI in national security systems. The Director of the Office of Science and Technology Policy shall serve as Vice Chair for the interagency council. The interagency council's membership shall include, at minimum, the heads of major agencies covered by the Chief Financial Officers (CFO) Act of 1990,[a] the Director of National Intelligence, and other agencies as identified by the chair.[b]	● Fully implemented. On December 12, 2023, OMB convened and chaired the Chief AI Officer Council to coordinate the development and use of AI in agencies' programs and operations. According to OMB, this interagency council's membership includes the appropriate leadership and representatives from CFO Act agencies, as required.
Issue guidance to agencies to strengthen the effective and appropriate use of AI, advance AI innovation, and manage risks from AI in the federal government. The Director of OMB's guidance shall specify: (1) the requirement to designate at each agency a Chief AI Officer; (2) the Chief AI Officers' roles, responsibilities, seniority, position, and reporting structures; (3) the creation of internal AI governance boards at agencies covered by the CFO Act of 1990; (4) required minimum risk management practices for government uses of AI that impact people's rights or safety; (5) specific federal government uses of AI that are presumed by default to impact rights or safety; (6) recommendations to agencies to reduce barriers to the responsible use of AI, including barriers related to IT infrastructure, data, workforce, budgetary restrictions, and cybersecurity processes; (7) requirements that agencies covered by the CFO Act of 1990 develop AI strategies and pursue high-impact AI use cases; (8) recommendations to agencies regarding external testing, safeguards, watermarking, application of the mandatory minimum risk management practices, independent evaluation, documentation and oversight, among other things; and (9) requirements for public reporting on compliance with this guidance.	● Fully implemented. On March 28, 2024, OMB issued its M-24-10 memorandum to the heads of executive departments and agencies to strengthen AI governance, advance responsible AI innovation, and manage risks from the use of AI.[c] The memorandum includes the nine requirements established in the EO.
Issue instructions to agencies for the collection, reporting, and publication of agency AI use cases on an annual basis. Through these instructions, the Director shall, as appropriate, expand agencies' reporting on how they are managing risks from their AI use cases and update or replace the guidance originally established in EO 13960.	● Fully implemented. In early 2023, OMB issued instructions to guide agencies' collection, reporting, and publication of their AI use cases. OMB later updated and released draft guidance on March 28, 2024. Consistent with the EO's annual requirement, OMB expects to issue finalized instructions by the end of this calendar year.

Legend: ● Fully implemented = agency evidence fully satisfied the requirement.

Source: GAO analysis of OMB efforts to implement key AI requirements. | GAO-24-107332

[a]The 24 major agencies covered by the Chief Financial Officers Act of 1990 are the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State, Transportation, the Treasury, and Veterans Affairs; the Environmental Protection Agency; General Services Administration; National Aeronautics and Space Administration; National Science Foundation; Nuclear Regulatory Commission; Office of Personnel Management; Small Business Administration;

Social Security Administration; and the U.S. Agency for International Development (31 U.S.C. § 901(b)).

[b]According to the EO, until agencies designate their permanent Chief AI Officers consistent with the guidance described in subsection 10.1(b) of this section, they shall be represented on the interagency council by an appropriate official at the Assistant Secretary level or equivalent, as determined by the head of each agency.

[c]OMB, *Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence*, M-24-10 (Washington, D.C.: Mar. 28, 2024).

In response to the EO, OMB stated that it convened and chaired the Chief AI Officer Council. According to the OMB AI Policy Advisor, the interagency council is comprised of federal officials that are responsible for coordinating the development and use of AI at their agencies. According to a meeting invitation that OMB provided, the initial meeting was held in December 2023, and primarily focused on the agencies covered by the Chief Financial Officers (CFO) Act of 1990.[26]

OMB also issued its March 2024 memorandum, M-24-10, to guide federal agencies on the effective and appropriate use of AI, AI innovation, and managing risks from AI.[27] The guidance incorporated the requirements of the EO, such as the designation of a Chief AI Officer at each agency; the Chief AI Officers' roles, responsibilities, seniority, position, and reporting structures; and requirements for public reporting on compliance with the guidance.

Additionally, as we previously reported, OMB issued instructions to agencies to guide the collection, reporting, and publication of their AI use cases in early 2023.[28] In March 2024, OMB released a draft update to its instructions to agencies. The agency expects to complete this annual EO requirement no later than the end of calendar year 2024.

[26]The 24 major agencies covered by the Chief Financial Officers Act of 1990 are the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State, Transportation, the Treasury, and Veterans Affairs; the Environmental Protection Agency; General Services Administration; National Aeronautics and Space Administration; National Science Foundation; Nuclear Regulatory Commission; Office of Personnel Management; Small Business Administration; Social Security Administration; and the U.S. Agency for International Development (31 U.S.C. § 901(b)).

[27]OMB, *Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence*, M-24-10 (Washington, D.C.: Mar. 28, 2024).

[28]GAO, *Artificial Intelligence: Agencies Have Begun Implementation but Need to Complete Key Requirements*, GAO-24-105980 (Washington, D.C.: Dec. 12, 2023).

By organizing the interagency council of Chief AI Officers, issuing guidance to federal agencies on the effective use and risk management of AI, and reporting and publishing their AI use cases, OMB is better positioned to oversee federal agencies' AI programs and operations.

OSTP and OMB Implemented Requirements Intended to Increase AI Talent

EO 14110 requires OSTP and OMB to identify (1) priority mission areas for increased federal government AI talent, (2) the types of talent that are highest priority to recruit and develop, and (3) accelerated hiring pathways. OSTP and OMB implemented all three aspects of this requirement. Table 6 shows the extent to which OSTP and OMB had implemented one selected AI talent requirement from EO 14110, as of June 2024.

Table 6: Extent to Which the Office of Science and Technology Policy (OSTP) and the Office of Management and Budget (OMB) Implemented a Selected Artificial Intelligence (AI) Talent Requirement from Executive Order 14110, as of June 2024

Requirement	GAO assessment of selected requirements
Identify priority mission areas for increased federal government AI talent, the types of talent that are highest priority to recruit and develop to ensure adequate implementation of this order and use of relevant enforcement and regulatory authorities to address AI risks, and accelerated hiring pathways.	● Fully implemented. OSTP and OMB have identified priority mission areas for increased AI talent, established the types of talent that are the highest priority to recruit and develop, and identified accelerated hiring pathways.

Legend: ● Fully implemented = agency evidence fully satisfied the requirement.

Source: GAO analysis of OSTP efforts to implement key AI requirements. | GAO-24-107332

OSTP and OMB identified priority mission areas for increased AI talent, the types of talent that are the highest priority to recruit and develop, and accelerated hiring pathways. Specifically, regarding establishing priority mission areas, OSTP and OMB officials stated that the Directors of OSTP and OMB had identified three priority areas for increased talent:

- *Leveraging AI in Government:* Assess, pilot, and launch use cases for federal agencies to responsibly leverage AI to improve government services and programs.
- *Building AI Regulatory* Capacity: Ensure that the government develops and enforces policies around AI to protect rights, safety, and privacy.
- *Strengthening the AI Research and Development Ecosystem:* Build and invest in infrastructure and oversee federal research and development to enable the next generation of cutting-edge AI systems in the U.S.

OSTP and OMB also reported that, in December 2023, the agencies coordinated efforts to define categories for specific mission activities that

should be prioritized for hiring increased AI talent. These categories include:

- tasks identified by the President in EO 14110 and necessary adjuncts to those tasks;
- preparation for and execution of OMB's memorandum for Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence;[29] and
- regulation of AI consistent with priorities in EO 14110, the OMB memorandum, and the AI Bill of Rights.[30]

In July 2024, we verified that the agencies further identified specific mission activities within one or more of the categories, including:

- AI Safety and Security (including research and development (R&D));
- AI Equity, Civil Rights, and Privacy (including R&D); and
- Responsible and Effective Government Use of AI (including R&D).

The agencies reported that components named in the EO had reviewed and approved the mission-related categories and activities by December 12, 2023.

Regarding the types of highest priority types of talent, OSTP stated that it and OMB initially identified a list of competencies that are critical to supporting the outlined missions. OSTP also provided examples of the competencies to illustrate the types of talent that are highest priority to recruit. These examples include:

- expertise in the field of trust and safety,
- building prototypes of AI models and testing them,
- managing and recruiting an AI and AI-enabling workforce,
- testing and auditing internal and external AI models, and
- researching and evaluating emerging capabilities of AI models.

[29]OMB, *Advancing Governance, Innovation, and Risk Management for Agency Use of Artificial Intelligence*, M-24-10 (Washington, D.C.: Mar. 28, 2024).

[30]The White House, *Blueprint for an AI Bill of Rights; Making Automated Systems Work for the American People* (Washington, D.C.: October 2022).

In April 2024, the AI and Tech Talent Task Force released *Increasing AI Capacity Across the Federal Government: AI Talent Surge Progress and Recommendations*, which identified the AI and AI-enabling roles the National AI Talent Surge will recruit.[31] According to the report, the National AI Talent Surge is recruiting for the following AI and AI-enabling roles:

- data scientists, statisticians, and computer scientists to build and test AI models;
- operations researchers, sociologists, and economists to quantify and analyze how AI models will impact society;
- product managers to develop ideas and create success metrics for new AI models;
- software engineers to build systems to train, test, and deploy AI models;
- legal, privacy, and civil rights professionals to protect the public's rights and safety when AI is used, including attention to algorithmic bias as well as the misuse of AI systems for harmful outputs;
- AI-focused program managers to direct rollouts and change management for new AI products; and
- technical recruiters to help agencies build, develop, and retain strong and diverse AI workforces.

Regarding the identification of accelerated hiring pathways, OSTP reported that it and OMB coordinated with components named in the EO and the AI and Tech Talent Task Force to identify several pathways for an accelerated hiring process through dedicated technology talent programs. The talent programs included the U.S. Census Bureau, U.S. Digital Corps, USDS, and the PIF program to hire permanent federal AI professionals at agencies.[32] According to the AI and Tech Talent Task Force report, examples of the steps that have been taken to facilitate AI hiring across the federal government include OPM granted hiring

[31]AI and Tech Talent Task Force, *Increasing AI Capacity Across the Federal Government: AI Talent Surge Progress and Recommendations* (Washington, D.C.: April. 26, 2024); OSTP is one of the convening bodies of the AI and Tech Talent Force.

[32]The U.S. Census Bureau xD, USDS, and PIF are hiring senior-level technical leaders to advance the delivery of data-driven services, technologists to work on teams transforming critical, public-facing government services, and to advise, prototype, and scale solutions using industry best practices. The U.S. Digital Corps is hiring early career data scientists and AI professionals, as well as software engineers, designers, product managers, and cybersecurity analysts to address pressing technical projects in federal agencies.

authorities, such as direct hire authority and excepted service appointments; pay and workforce flexibilities, such as remote work; and empowering agency human resources and recruiting professionals.

By implementing the executive order requirement, OSTP and OMB are better positioned to accomplish their goals for rapidly increasing AI talent and allocating that talent to high priority mission areas.

GSA Published a FedRAMP Framework and the Technology Modernization Board Considered Prioritizing AI Funding

GSA is responsible for helping agencies develop AI solutions and improve the public experience with the federal government. GSA fully implemented two requirements for publishing its Federal Risk and Authorization Management Program (FedRAMP)[33] framework for prioritizing critical and emerging technologies and for the Technology Modernization Board[34] to consider prioritizing funding for AI projects. Table 7 shows the extent to which GSA had implemented key selected AI management and talent requirements from EO 14110, as of June 2024.

Table 7: Extent to Which the General Services Administration (GSA) Implemented Selected Artificial Intelligence (AI) Management and Talent Requirements from Executive Order 14110, as of June 2024

Requirement	GAO assessment of selected requirements
Develop and issue a framework for prioritizing critical and emerging technologies offerings in the Federal Risk and Authorization Management Program (FedRAMP) authorization process, starting with generative AI offerings that have the primary purpose of providing large language model-based chat interfaces, code-generation and debugging tools, and associated application programming interfaces, as well as prompt-based image generators. This framework shall apply for no less than 2 years from the date of its issuance.	● Fully implemented. On June 27, 2024, GSA issued the FedRAMP framework for prioritizing critical and emerging technologies in the authorization process.

[33]FedRAMP was established in 2011 to provide a standardized approach for authorizing the use of cloud services. Cloud computing is a means for enabling on-demand access to shared pools of configurable computing resources (e.g., networks, servers, storage applications, and services) that can be rapidly provisioned and released. Cloud services offer federal agencies a means to buy services more quickly and possibly at a lower cost than building, operating, and maintaining these computing resources themselves. FedRAMP aims to ensure that cloud services have adequate information security while also reducing operational costs.

[34]The Technology Modernization Board is responsible for providing input to the Director of OMB to develop processes for agencies to submit proposals, making recommendations to the Administrator of General Services to help agencies refine their submitted proposals, and evaluating and approving submitted proposals. The board is also responsible for recommending the funding of modernization projects to the Administrator of General Services and monitoring the progress and performance of approved projects in consultation with the Administrator of General Services. In addition, the board is tasked with monitoring the operating costs of the Technology Modernization Fund.

Requirement	GAO assessment of selected requirements
The Technology Modernization Board[a] shall consider, as it deems appropriate and consistent with applicable law, prioritizing funding for AI projects for the Technology Modernization Fund for a period of at least 1 year.	● Fully implemented. The board has called for agencies to identify AI projects for possible investment and offered multiple paths to funding. According to agency officials, the Technology Modernization Board considered prioritizing AI projects funding for its Technology Modernization Fund beginning in November 2023.

Legend: ● Fully implemented = agency evidence fully satisfied the requirement.

Source: GAO analysis of GSA efforts to implement key AI requirements. | GAO-24-107332

[a]The Technology Modernization Board is responsible for providing input to the Director of OMB to develop processes for agencies to submit funding proposals for AI projects, making recommendations to the Administrator of General Services to help agencies refine their submitted proposals, and evaluating and approving submitted proposals. The board is also responsible for recommending the funding of modernization projects to the Administrator of General Services and monitoring the progress and performance of approved projects in consultation with the Administrator of General Services. In addition, the board is tasked with monitoring the operating costs of the Technology Modernization Fund.

In response to the EO, GSA developed and released its framework for prioritizing emerging technologies for the FedRAMP authorization process on June 27, 2024. The framework is designed to facilitate rapid authorization of commercial AI capabilities for agency use. It includes an initial list of three generative AI[35] capabilities, required by EO 14110, that are to be the first emerging technologies to be prioritized:

- **Chat interfaces.** These are products that use conversational chat interfaces to ask users questions, then use a large language model—a type of AI that are trained on massive amounts of data, largely collected from public internet sites—to create text-based content based on the answers.
- **Code-generation and debugging tools.** These are tools used by software developers to help them with creating and finding errors in software.
- **Prompt-based image generators.** These are products that take text or photographic input and generate new images or videos based on the inputs.

According to the framework, FedRAMP will also prioritize a fourth area—general purpose Application Programming Interface[36] solutions that are to

[35]Generative AI is a technology that can create content, including text, images, audio, or video, when prompted by a user.

[36]An Application Programming Interface sets up machine-to-machine communication, which allows users to connect directly with the data and can allow real-time data updates.

facilitate the integration of the three prioritized capabilities into new and existing systems.

Additionally, the Technology Modernization Board verbally considered prioritizing AI projects funding for the Technology Modernization Fund during two November 2023 meetings, according to GSA officials. The board has called for agencies to identify AI projects for possible investment and offered multiple paths to funding.[37] In February 2024, the Technology Modernization Fund program management office issued an announcement for federal agencies to submit AI project funding proposals that include generative AI. According to the Technology Modernization Board, as of June 2024, six agencies have submitted their AI project funding proposals to the Technology Modernization Board. The Technology Modernization Board, Technology Modernization Fund program management office, and OMB plan to evaluate project funding proposals and related risk mitigation plans to ensure they are sound, have executive support, and that project teams are able to successfully execute them.

By issuing the FedRAMP framework, GSA should be better positioned to provide routine and consistent prioritization of the most critical cloud solutions needed for use by federal agencies. In addition, the Technology Modernization Board's efforts to prioritize funding for AI projects should allow the federal government to improve public service quality through the adoption of AI solutions.

OPM Implemented AI Workforce Requirements and Issued Guidance on Pay

Per EO 14110, OPM is responsible for leading federal AI workforce and workplace reviews and issuing related guidance, among other things. OPM implemented four selected requirements related to (1) reviewing hiring and workplace flexibility; (2) considering excepted service appointments; (3) coordinating a pooled approach for hiring AI talent across agencies; and (4) issuing guidance on AI-related pay and incentives. Table 8 shows the extent to which OPM implemented four selected AI management and talent requirements from EO 14110, as of June 2024.

[37] https://tmf.cio.gov/ai/.

Table 8: Extent to Which the Office of Personnel Management (OPM) Implemented Selected Artificial Intelligence (AI) Management and Talent Requirements from Executive Order (EO) 14110, as of June 2024

Requirement	GAO assessment of selected requirements
Conduct an evidence-based review on the need for hiring and workplace flexibility, including federal government-wide direct hire authority for AI and related data science and technical roles, and, where the Director of OPM finds such authority is appropriate, grant it; this review shall include the following job series at all General Schedule levels: IT Specialist (2210), Computer Scientist (1550), Computer Engineer (0854), and Program Analyst (0343) focused on AI, and any subsequently developed job series derived from these job series.	● Fully implemented. According to OPM, it conducted a review of hiring and workplace flexibility, to include federal government-wide direct hire authority for AI. On December 29, 2023, OPM issued a memorandum to executive departments and agencies authorizing government-wide, direct-hire authority for the AI-related job series listed in the EO.[a]
Consider authorizing the use of excepted service appointments to address the need for hiring additional staff to implement directives of this order.	● Fully implemented. OPM's December 2023 memorandum authorized the use of excepted service appointments to address hiring needs in order to implement directives of the EO.
Coordinate a pooled-hiring action informed by subject matter experts and using skills-based assessments to support the recruitment of AI talent across agencies.	● Fully implemented. OPM coordinated a pooled approach for the recruitment and hiring of AI talent across federal agencies that involved subject matter experts and used skills-based assessments.
Issue guidance for agency application of existing pay flexibilities or incentive pay programs for AI, AI-enabling, and other key technical positions to facilitate appropriate use of current pay incentives.	● Fully implemented. On February 27, 2024, OPM issued its CPM 2024-06 memorandum to executive departments and agencies on pay flexibilities and incentive pay programs for AI, AI-enabling, and other key technical positions, among other things.[b]

Legend: ● Fully implemented = agency evidence fully satisfied the requirement.

Source: GAO analysis of OPM efforts to implement key AI requirements. | GAO-24-107332

[a]OPM, *Government-wide Hiring Authorities for Advancing Federal Government Use of Artificial Intelligence (AI)* (Washington, D.C.: Dec. 29, 2023).

[b]OPM, Pay Flexibility, *Incentive Pay, and Leave and Workforce Flexibility Programs for Artificial Intelligence (AI), AI-enabling, and Other Key Technical Employees*, CPM 2024-06 (Washington, D.C.: Feb. 27, 2024).

To address the EO requirements, OPM stated that it conducted a review of hiring and workplace flexibility needs to verify the existence of a critical hiring need, to include government-wide, direct hire authority for AI. In December 2023, OPM issued a memorandum to authorize government-wide direct hire authority for positions that it identified as a critical need.[38] These positions and related job series for General Service (GS) grade levels GS-9 through GS-15 include:

- IT Specialist (2210),
- Computer Scientist-Artificial Intelligence (1550),
- Computer Engineer-Artificial Intelligence (0854), and

[38]OPM, *Government-wide Hiring Authorities for Advancing Federal Government Use of Artificial Intelligence (AI)* (Washington, D.C.: Dec. 29, 2023).

- Management and Program Analyst (0343).

OPM authorized the direct hire authority through December 31, 2028, or until OPM terminates this authority. The memorandum also includes the authorized use of temporary excepted service appointments to address hiring needs in support of the EO.

In addition, OPM coordinated a talent pool to recruit and hire AI talent across federal agencies based on subject-matter experts' involvement and skill-based assessments.[39] According to a January 2024 Chief Data Officer Council presentation for cross government hiring, OPM coordinated actions for the data scientist position at multiple agencies. Specifically, 10 subject matter experts from nine hiring agencies met to discuss the position and to identify and assess the skill requirements that would meet the agencies' needs, among other things. OPM posted the job announcement for the data scientist position to the USAJOBS website in January 2024,[40] which included duties related to AI.

In February 2024, OPM issued a memorandum to guide federal agencies on available pay flexibilities and incentive pay programs to recruit and retain AI, AI-enabling, and other key technical employees.[41] The pay flexibilities and incentive pay programs include incentives for recruitment, relocation, and retention; a student loan repayment program; superior qualifications and special needs pay-setting authority; critical position pay; and waivers of recruitment, relocation, and retention incentive payment limits. In addition to pay flexibilities and incentive pay, the memorandum includes information on leave and workplace flexibilities, such as alternative work schedules, telework, and remote work.

By implementing the EO AI requirements, OPM is better positioned to meet critical needs for rapidly hiring qualified personnel in key technical positions to build and govern AI in line with the Administration's priorities.

[39]According to OPM, a talent pool is a list of qualified candidates who are already on an approved shared hiring certificate and ready to be hired. The candidates have opted-in to share their application with other federal agencies who are hiring for similar positions.

[40]USAJOBS is an OPM website that serves as the federal government's official employment site. USAJOBS connects job seekers with federal employment opportunities across the United States and around the world. https://www.usajobs.gov/.

[41]OPM, *Pay Flexibility, Incentive Pay, and Leave and Workforce Flexibility Programs for Artificial Intelligence (AI), AI-enabling, and Other Key Technical Employees*, CPM 2024-06 (Washington, D.C.: Feb. 27, 2024).

Agencies Implemented Initial Plans for AI Talent Recruitment

The EO gives OMB's USDS,[42] GSA's PIF and U.S. Digital Corps,[43] OPM, and technology talent programs at agencies the responsibility to develop and begin to implement plans to support the recruitment and increase of key AI talent in the workforce. The agencies implemented this selected requirement. Table 9 shows the extent to which the agencies and technology talent programs had implemented one selected AI talent requirement from EO 14110, as of June 2024.

Table 9: Extent to Which the United States Digital Service (USDS), Presidential Innovation Fellows (PIF), United States Digital Corps, Office of Personnel Management (OPM), and Agencies' Technology Talent Programs Implemented a Selected Artificial Intelligence (AI) Talent Requirement from Executive Order 14110, as of June 2024

Requirement	GAO assessment of selected requirements
The USDS, PIF, United States Digital Corps, OPM, and technology talent programs at agencies, with support from the AI and Technology Talent Task Force, shall develop and begin to implement plans to support the rapid recruitment of individuals as part of a federal government-wide AI talent surge to accelerate the placement of key AI and AI-enabling talent in high-priority areas and to advance agencies' data and technology strategies.	● Fully implemented. USDS, PIF, U.S. Digital Corps, OPM, and technology talent programs developed and implemented initial plans to support the rapid recruitment of AI talent in the government. OMB officials stated that USDS collaborated with Office of Science and Technology Policy to create and operationalize a webpage for AI-related federal positions in October 2023.[a]

Legend: ● Fully implemented = agency evidence fully satisfied the requirement.

Source: GAO analysis of the Office of Management and Budget (OMB), General Services Administration (GSA), Office of Personnel Management (OPM), and technology talent programs' efforts to implement key AI requirements. | GAO-24-107332

[a]The https://AI.gov/apply/ webpage is the federal government's site for rapidly hiring talent to build and govern AI to fulfill the priorities set forth by the Administration.

The USDS, PIF, U.S. Digital Corps, OPM, and agencies' technology talent programs implemented their requirement for developing and implementing initial plans in support of AI talent recruitment. OMB officials stated that USDS collaborated with OSTP to create the AI.gov/apply webpage, which was operationalized in October 2023. The agency officials also stated that the webpage had directed approximately 2,300 job applications to the USDS, PIF, U.S. Digital Corps, and Census xD programs, as of February 2024. OMB also reported that agencies had hired over 150 professionals into AI and AI-enabling roles since the EO

[42]As part of OMB, the USDS was founded in August 2014 and is intended to bring together the best engineering, design, and government talent to change the government's approach to technology and deliver better government services to the American people through technology and design.

[43]PIF is a program that pairs talented, diverse technologists and innovators with top civil-servants and change-makers working at the highest levels of the federal government to tackle some of our nation's biggest challenges. PIF is operated by GSA's Technology Transformation Services. The U.S. Digital Corps is a cross-government fellowship opportunity operated by GSA's Technology Transformation Services.

was signed and, as of April 2024, the government was on track to hire 94 additional professionals by summer 2024.

Since these agencies and talent programs developed and implemented plans for AI talent recruitment, the government is likely to increase AI expertise in high-priority areas quickly and more efficiently.

Agency Comments

We provided a draft of this report to EOP, OMB, OPM, OSTP, and GSA for review and comment. OMB and OSTP provided technical comments, which we incorporated as appropriate. EOP, OPM, and GSA did not have any comments on the report.

We are sending copies of this report to the appropriate congressional committees; the Executive Office of the President; the Directors of the Offices of Management and Budget, Science and Technology Policy, and Personnel Management; the Administrator of the General Services Administration; and other interested parties. In addition, the report is available at no charge on the GAO website at https://www.gao.gov. If you or your staff have any questions about this report, please contact Kevin Walsh at (202) 512-6151 or WalshK@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

Kevin Walsh
Director, Information Technology and Cybersecurity

List of Addressees

The Honorable Maria Cantwell
Chair
Committee on Commerce, Science, and Transportation
United States Senate

The Honorable Gary C. Peters
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable James Comer
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The Honorable Jamie Raskin
Ranking Member
Committee on Oversight and Accountability
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House of Representatives

The Honorable Nancy Mace
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The Honorable Bill Foster
House of Representatives

The Honorable Scott Franklin
House of Representatives

The Honorable Ted W. Lieu
House of Representatives

The Honorable Rich McCormick, M.D., M.B.A.
House of Representatives

Appendix I: Objective, Scope, and Methodology

Our objective was to evaluate the extent to which selected agencies have complied with implementation of selected artificial intelligence (AI) management and talent requirements from Executive Order (EO) 14110.

To address our objective, we identified key AI requirements in EO 14110, *Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence*.[1] We selected requirements that (1) were due within 150 days of the issuance of the EO (by the end of March 2024), (2) had government-wide implications for AI management and talent, and (3) had clear deliverables.[2] We identified 13 requirements from the following EO sections:

- §10.1 Providing Guidance for AI Management,
- §10.2 Increasing AI Talent in Government, and
- §12 Implementation.

The requirements assigned various responsibilities to the Executive Office of the President (EOP), Office of Management and Budget (OMB), Office of Personnel Management (OPM), Office of Science and Technology Policy (OSTP), General Services Administration (GSA), U.S. Digital Corps, U.S. Digital Service (USDS), and Presidential Innovation Fellows (PIF).[3] The following table 10 displays the selected requirements.

[1]Exec. Order 14110, *Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence* (Oct. 30, 2023).

[2]Stanford University's Institute for Human-Centered AI is performing similar work, using publicly available data, on the implementation of the requirements within EO 14110. See https://hai.stanford.edu/news/numbers-tracking-ai-executive-order (accessed July 8, 2024).

[3]OMB and OSTP are offices within the EOP. USDS is an office within OMB. U.S. Digital Corps and PIF are program offices within GSA.

Table 10: Selected Artificial Intelligence (AI) Requirements in Executive Order (EO) 14110

Section title	Requirement	Responsible agency(ies)
§10.1(a) Providing Guidance for AI Management	To coordinate the use of AI across the federal government, within 60 days of the date of this order and on an ongoing basis as necessary, the Director of Office of Management and Budget (OMB) shall convene and chair an interagency council to coordinate the development and use of AI in agencies' programs and operations, other than the use of AI in national security systems. The Director of Office of Science and Technology Policy (OSTP) shall serve as Vice Chair for the interagency council. The interagency council's membership shall include, at minimum, the heads of the agencies identified in 31 U.S.C. 901(b), the Director of National Intelligence, and other agencies as identified by the Chair. Until agencies designate their permanent Chief AI Officers consistent with the guidance described in subsection 10.1(b) of this section, they shall be represented on the interagency council by an appropriate official at the Assistant Secretary level or equivalent, as determined by the head of each agency.	OMB

§10.1(b) Providing Guidance for AI Management	To provide guidance on federal government use of AI, within 150 days of the date of this order and updated periodically thereafter, the Director of OMB, in coordination with the Director of OSTP, and in consultation with the interagency council established in subsection 10.1(a) of this section, shall issue guidance to agencies to strengthen the effective and appropriate use of AI, advance AI innovation, and manage risks from AI in the federal government. The Director of OMB's guidance shall specify, to the extent appropriate and consistent with applicable law: (i) the requirement to designate at each agency within 60 days of the issuance of the guidance a Chief AI Officer who shall hold primary responsibility in their agency, in coordination with other responsible officials, for coordinating their agency's use of AI, promoting AI innovation in their agency, managing risks from their agency's use of AI, and carrying out the responsibilities described in section 8(c) of Executive Order 13960 of December 3, 2020 (Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government), and section 4(b) of Executive Order 14091; (ii) the Chief AI Officers' roles, responsibilities, seniority, position, and reporting structures; (iii) for the agencies identified in 31 U.S.C. 901(b), the creation of internal AI governance boards, or other appropriate mechanisms, at each agency within 60 days of the issuance of the guidance to coordinate and govern AI issues through relevant senior leaders from across the agency; (iv) required minimum risk management practices for government uses of AI that impact people's rights or safety, including, where appropriate, the following practices derived from OSTP's Blueprint for an AI Bill of Rights and the NIST AI Risk Management Framework: conducting public consultation; assessing data quality; assessing and mitigating disparate impacts and algorithmic discrimination; providing notice of the use of AI; continuously monitoring and evaluating deployed AI; and granting human consideration and remedies for adverse decisions made using AI; (v) specific federal government uses of AI that are presumed by default to impact rights or safety; (vi) recommendations to agencies to reduce barriers to the responsible use of AI, including barriers related to IT infrastructure, data, workforce, budgetary restrictions, and cybersecurity processes; (vii) requirements that agencies identified in 31 U.S.C. 901(b) develop AI strategies and pursue high-impact AI use cases; (viii) in consultation with the Secretary of Commerce, the Secretary of Homeland Security, and the heads of other appropriate agencies as determined by the Director of OMB, recommendations to agencies regarding: (A) external testing for AI, including AI red-teaming for generative AI, to be developed in coordination with the Cybersecurity and Infrastructure Security Agency; (B) testing and safeguards against discriminatory, misleading, inflammatory, unsafe, or deceptive outputs, as well as against producing child sexual abuse material and against producing non-consensual intimate imagery of real individuals (including intimate digital depictions of the body or body parts of an identifiable individual), for generative AI; (C) reasonable steps to watermark or otherwise label output from generative AI; (D) application of the mandatory minimum risk management practices defined under subsection 10.1(b)(iv) of this section to procured AI; (E) independent evaluation of vendors' claims concerning both the effectiveness and risk mitigation of their AI offerings; (F) documentation and oversight of procured AI; (G) maximizing the value to agencies when relying on contractors to use and enrich federal government data for the purposes of AI development and operation; (H) provision of incentives for the continuous improvement of procured AI; and (I) training on AI in accordance with the principles set out in this order and in other references related to AI listed herein; and (ix) requirements for public reporting on compliance with this guidance.	OMB

Section title	Requirement	Responsible agency(ies)
§10.1(e) Providing Guidance for AI Management	To improve transparency for agencies' use of AI, the Director of OMB shall, on an annual basis, issue instructions to agencies for the collection, reporting, and publication of agency AI use cases, pursuant to section 7225(a) of the Advancing American AI Act. Through these instructions, the Director shall, as appropriate, expand agencies' reporting on how they are managing risks from their AI use cases and update or replace the guidance originally established in section 5 of Executive Order 13960.	OMB
§10.1(f)(ii) Providing Guidance for AI Management	Within 90 days of the date of this order, the Administrator of General Services, in coordination with the Director of OMB, and in consultation with the Federal Secure Cloud Advisory Committee and other relevant agencies as the Administrator of General Services may deem appropriate, shall develop and issue a framework for prioritizing critical and emerging technologies offerings in the Federal Risk and Authorization Management Program authorization process, starting with generative AI offerings that have the primary purpose of providing large language model-based chat interfaces, code-generation and debugging tools, and associated application programming interfaces, as well as prompt-based image generators. This framework shall apply for no less than 2 years from the date of its issuance. Agency Chief Information Officers, Chief Information Security Officers, and authorizing officials are also encouraged to prioritize generative AI and other critical and emerging technologies in granting authorities for agency operation of IT systems and any other applicable release or oversight processes, using continuous authorizations and approvals wherever feasible.	General Services Administration (GSA)
§10.1(g) Providing Guidance for AI Management	Within 30 days of the date of this order, to increase agency investment in AI, the Technology Modernization Board shall consider, as it deems appropriate and consistent with applicable law, prioritizing funding for AI projects for the Technology Modernization Fund for a period of at least 1 year. Agencies are encouraged to submit to the Technology Modernization Fund project funding proposals that include AI—and particularly generative AI—in service of mission delivery.	GSA/ Technology Modernization Board
§10.2(a) Increasing AI Talent in Government	Within 45 days of the date of this order, to plan a national surge in AI talent in the federal government, the Director of OSTP and the Director of OMB, in consultation with the Assistant to the President for National Security Affairs, the Assistant to the President for Economic Policy, the Assistant to the President and Domestic Policy Advisor, and the Assistant to the President and Director of the Gender Policy Council, shall identify priority mission areas for increased federal government AI talent, the types of talent that are highest priority to recruit and develop to ensure adequate implementation of this order and use of relevant enforcement and regulatory authorities to address AI risks, and accelerated hiring pathways.	OSTP and OMB

Section title	Requirement	Responsible agency(ies)
§10.2(b) Increasing AI Talent in Government	Within 45 days of the date of this order, to coordinate rapid advances in the capacity of the federal AI workforce, the Assistant to the President and Deputy Chief of Staff for Policy, in coordination with the Director of OSTP and the Director of OMB, and in consultation with the National Cyber Director, shall convene an AI and Technology Talent Task Force, which shall include the Director of OPM, the Director of the General Services Administration's Technology Transformation Services, a representative from the Chief Human Capital Officers Council, the Assistant to the President for Presidential Personnel, members of appropriate agency technology talent programs, a representative of the Chief Data Officer Council, and a representative of the interagency council convened under subsection 10.1(a) of this section. The Task Force's purpose shall be to accelerate and track the hiring of AI and AI-enabling talent across the federal government, including through the following actions: (i) within 180 days of the date of this order, tracking and reporting progress to the President on increasing AI capacity across the federal government, including submitting to the President a report and recommendations for further increasing capacity; (ii) identifying and circulating best practices for agencies to attract, hire, retain, train, and empower AI talent, including diversity, inclusion, and accessibility best practices, as well as to plan and budget adequately for AI workforce needs; (iii) coordinating, in consultation with the Director of OPM, the use of fellows programs and agency technology talent programs and human capital teams to build hiring capabilities, execute hires, and place AI talent to fill staffing gaps; and (iv) convening a cross-agency forum for ongoing collaboration between AI professionals to share best practices and improve retention.	Assistant to the President and Deputy Chief of Staff for Policy
§10.2(c) Increasing AI Talent in Government	Within 45 days of the date of this order, to advance existing federal technology talent programs, the United States Digital Service (USDS), Presidential Innovation Fellows (PIF), United States Digital Corps, Office of Personnel Management (OPM), and technology talent programs at agencies, with support from the AI and Technology Talent Task Force described in subsection 10.2(b) of this section, as appropriate and permitted by law, shall develop and begin to implement plans to support the rapid recruitment of individuals as part of a federal government-wide AI talent surge to accelerate the placement of key AI and AI-enabling talent in high-priority areas and to advance agencies' data and technology strategies.	OMB/ USDS, OPM, GSA/ U.S. Digital Corps, and PIF
§10.2(d)(i) Increasing AI Talent in Government	within 60 days of the date of this order, conduct an evidence-based review on the need for hiring and workplace flexibility, including federal government-wide direct hire authority for AI and related data science and technical roles, and, where the Director of OPM finds such authority is appropriate, grant it; this review shall include the following job series at all General Schedule levels: IT Specialist (2210), Computer Scientist (1550), Computer Engineer (0854), and Program Analyst (0343) focused on AI, and any subsequently developed job series derived from these job series.	OPM
§10.2(d)(ii) Increasing AI Talent in Government	within 60 days of the date of this order, consider authorizing the use of excepted service appointments under 5 CFR 213.3102(i)(3) to address the need for hiring additional staff to implement directives of this order.	OPM
§10.2(d)(iii) Increasing AI Talent in Government	within 90 days of the date of this order, coordinate a pooled-hiring action informed by subject matter experts and using skills-based assessments to support the recruitment of AI talent across agencies.	OPM
§10.2(d)(iv) Increasing AI Talent in Government	within 120 days of the date of this order, as appropriate and permitted by law, issue guidance for agency application of existing pay flexibilities or incentive pay programs for AI, AI-enabling, and other key technical positions to facilitate appropriate use of current pay incentives	OPM

Section title	Requirement	Responsible agency(ies)
§12(a) Implementation	There is established, within the Executive Office of the President, the White House Artificial Intelligence Council (White House AI Council). The function of the White House AI Council is to coordinate the activities of agencies across the federal government to ensure the effective formulation, development, communication, industry engagement related to, and timely implementation of AI-related policies, including policies set forth in this order. (b) The Assistant to the President and Deputy Chief of Staff for Policy shall serve as Chair of the White House AI Council. (c) In addition to the Chair, the White House AI Council shall consist of the following members, or their designees: (I) the Secretary of State; (ii) the Secretary of the Treasury; (iii) the Secretary of Defense; (iv) the Attorney General; (v) the Secretary of Agriculture; (vi) the Secretary of Commerce; (vii) the Secretary of Labor; (viii) the Secretary of HHS; (ix) the Secretary of Housing and Urban Development; (x) the Secretary of Transportation; (xi) the Secretary of Energy; (xii) the Secretary of Education; (xiii) the Secretary of Veterans Affairs; (xiv) the Secretary of Homeland Security; (xv) the Administrator of the Small Business Administration; (xvi) the Administrator of the United States Agency for International Development; (xvii) the Director of National Intelligence; (xviii) the Director of NSF; (xix) the Director of OMB; (xx) the Director of OSTP; (xxi) the Assistant to the President for National Security Affairs; (xxii) the Assistant to the President for Economic Policy; (xxiii) the Assistant to the President and Domestic Policy Advisor; (xxiv) the Assistant to the President and Chief of Staff to the Vice President; (xxv) the Assistant to the President and Director of the Gender Policy Council; (xxvi) the Chairman of the Council of Economic Advisers; (xxvii) the National Cyber Director; (xxviii) the Chairman of the Joint Chiefs of Staff; and (xxix) the heads of such other agencies, independent regulatory agencies, and executive offices as the Chair may from time to time designate or invite to participate. (d) The Chair may create and coordinate subgroups consisting of White House AI Council members or their designees, as appropriate.	Executive Office of the President

Source: GAO analysis of EO 14110. | GAO-24-107332

We compared agency documentation, such as draft guidance for AI inventory reporting, memorandums, and presidential fact sheets against the selected requirements to determine the extent to which agencies are meeting the requirements identified in table 10.

For each selected requirement, we considered a requirement to be fully implemented if an agency provided evidence that fully satisfies it. We considered a requirement to be partially implemented if an agency provided evidence that satisfied some, but not all, of it. Lastly, we considered a practice to not be implemented if an agency did not provide evidence that satisfied any of the requirement.

For each of our objectives, we interviewed relevant officials at the EOP, OMB, OPM, OSTP, GSA, and USDS to obtain additional information on agency efforts to comply with AI federal policy. These officials included the Assistant to the President, OMB's AI Policy Advisor, and GSA's Chief Data Officer.

We conducted this performance audit from January 2024 to September 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to

obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: GAO Contact and Staff Acknowledgments

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Staff Acknowledgments

In addition to the individual named above, principal contributors to this report were Jessica Steele (Assistant Director), Paris Hall (Analyst-in-Charge), Andrew Avery, Sharhonda Deloach, Rebecca Eyler, and Smith Julmisse.

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