

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



Preventing Conflicts of Interest
in the Executive Branch

U.S. Office of Government Ethics (OGE) Artificial Intelligence Compliance Plan

Prepared by the
Chief Artificial Intelligence Officer

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I. INTRODUCTION AND AUTHORITY

In accordance with the Office of Management and Budget's (OMB) Memorandum [M-25-21, Accelerating Federal Use of AI through Innovation, Governance, and Public Trust](#), the U.S. Office of Government Ethics (OGE) is pleased to share its plan to achieve consistency with the requirements of M-25-21.

II. COMPLIANCE PLAN

Scope:

OGE is not currently using covered AI. However, OGE is actively evaluating commercial-off-the-shelf (COTS) products, such as Microsoft's Copilot Chat and GSA's USAI (www.USAI.gov), a shared service. OGE has not developed and does not anticipate creating custom AI code, large language models, or data sets. OGE is convening a cross-functional team of OGE staff to form an AI working group. This team will be tasked with creating/reviewing/developing policies, governance needs, training needs, and potential AI uses cases for OGE and the executive branch ethics program.

Driving AI Innovation:

Developing an Agency AI Strategy – this requirement is only applicable to CFO Act agencies.

Sharing of Agency Data and AI Assets – OGE not anticipate creating custom-developed code but would take steps to proactively share across the federal government. OGE's CAIO and CDO will work together to add any "data assets" that meet the threshold for the data inventories required by M-25-02. OGE's CAIO is also a member of OGE's Data Governance Board. To review risks with privacy, OGE's privacy team will be part of OGE's AI Working Group.

Effective Federal Procurement of AI - OGE will follow M-25-21 directives to drive AI implementation by maximizing reuse, avoiding duplication, and favoring **American-made AI in procurement**. OGE commits to participating in Federal coordination bodies, such as the Chief AI Officer Council, to share best practices and advance responsible AI adoption across the government. OGE is currently evaluating commercial-off-the-shelf (COTS) products, such as Microsoft's Copilot Chat and GSA's USAI (www.USAI.gov), a shared service. OGE has not developed and does not anticipate creating custom AI code, large language models, or data sets.

Enabling an AI-Ready Federal Workforce - OGE recognizes that building and maintaining a skilled AI workforce is crucial for advancing responsible AI innovation. To develop and maintain, at a minimum, foundational knowledge of how to use AI responsibly in performing their official duties OGE will leverage its AI Working Group to research, identify and recommend targeted training for OGE employees. OGE will also leverage its existing Employee Development plan which enables employees time to work toward professional development goals that support the agency's mission. Lastly, OGE will share and recommend staff training provided by OMB and GSA to strengthen the technical skills of staff in AI and AI-enabling roles.

As appropriate, OGE will enhance its recruitment efforts on individuals that have demonstrated operational experience in designing, deploying, and scaling AI systems in high-impact environments.

To ensure accountability, the AI working group will identify a process for tracking existing and emerging needs related to AI talent.

Improving AI Governance:

Agency Governance Roles and Bodies - OGE met the deadline for retaining a Chief AI Officer (CAIO).

Agency Governance Responsibilities:

Update Agency Policies and Develop Generative AI Policy - OGE is forming an internal working group to include representatives from cybersecurity, privacy, legal, data, and records to recommend updates to OGE's internal policies on IT infrastructure, data, and cybersecurity to OGE's Chief Artificial Intelligence Officer. This group will also develop a generative AI policy to set the terms of acceptable use of generative AI for OGE's mission and establish adequate safeguards and oversight mechanisms that allow generative AI to be used in the agency without posing undue risk. The working group will commence in October 2025 to help ensure OGE meets the deadlines established by M-25-21. The working group will seek guidance from agencies who have already drafted these policies.

Update AI Use Case Inventories - Prior to the procurement, development, or implementation of any covered AI, OGE will develop, maintain, and publish an **AI Use-Case Inventory annually** and post a public version on the agency's website. OGE's working group will include two sub-groups with a specific focus on developing potential use cases for OGE and the executive branch ethics program. The adoption of any use case include a structured solicitation, a formal evaluation and prioritization system based on feasibility, impact, and risk profile, and continuous monitoring. OGE's working group will identify and evaluate use cases for OGE's use and for the Executive branch wide ethics program.

Fostering Public Trust in Federal Use of AI:

High-Impact AI Determination - AI is considered "**high-impact AI**" when its output serves as a principal basis for decisions or actions that have a legal, material, binding, or significant effect on rights or safety. The CAIO and the AI working group will evaluate each potential use case to determine the applicability of this definition.

Minimum Risk Practices and Termination - OGE has no high-impact AI use cases and does not plan to pursue uses of AI that would qualify as "high-impact" under M-25-21. Since OGE is not currently pursuing high-impact AI, the agency complies with M-25-21's requirement to safely discontinue any non-compliant high-impact AI use cases by simply not adopting them. To ensure future compliance with the requirements of M-25-21 (Section 4), OGE will develop and implement agency-specific minimum risk management practices (including pre-deployment testing, ongoing monitoring, and human oversight) and waiver procedures by the **April 2, 2026**, deadline, ensuring readiness should OGE adopt high-impact AI in the future.

Conclusion

As demonstrated by the description of OGE's ongoing and planned activities, the Agency is committed to achieving consistency with OMB Memorandum M-25-21 and accelerating the responsible use of AI.