U.S. Chemical Safety and Hazard Investigation Board
Compliance Plan for OMB Memorandum M-25-21
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Executive Summary

This plan describes how the U.S. Chemical Safety and Hazard Investigation Board (CSB) is aligning its operation with the requirements of OMB M-25-21, M-25-22 and the AI in Government Act of 2020. While CSB is a small independent federal agency with limited resources (financial and human capital), we recognize AI as a strategic capability for advancing the mission of the agency. The CSB is exploring opportunities to implement AI technologies consistent with the limitations imposed upon the data collected in the execution of the agency's mission.

This plan is organized into the three areas of focus identified in the memorandum: Driving Innovation, Strengthening Governance, and Fostering Public Trust. The CSB is committed to adopting artificial intelligence (AI) technologies in a responsible, transparent, and tailored manner, consistent with the agency's limited staffing and financial resources and the controlled use of acquired data.

1. **Driving AI Innovation**

   Removing Barriers to the Responsible Use of AI

   - The CSB has not identified any significant barriers to the responsible use of AI regarding the administrative functions performed at the agency. The agency will continue to monitor potential barriers and will take steps to mitigate or remove them. When sufficient resources are available, the CSB plans to leverage all available sources of viable AI applications, such as reputable U.S. based technology companies specializing in AI tools, as well as the vetted sources developed by GSA for federal consumers.

   - Currently, the CSB does not have the resources to develop an AI application for the processing of data and work product classified as For Official Use Only (FOUO), restricted due to the terms of a Non-Disclosure Agreement, and/or confidential business information. As resources become available, the CSB will explore opportunities to apply AI technology to maximize its capability.

   Sharing and Reuse

   - The CSB will promote the sharing and reuse of AI code, models, and data assets within the agency consistent with the classification of the data. The Chief AI Officer will lead the coordination between developers and users of AI to make applications and

unrestricted data sources accessible by all.

AI Talent

- The CSB will leverage all available government-wide training opportunities to develop the technical competency of its staff related to AI skills. As the use of AI and the need for expanded support grows, the agency will assess and identify the specific technical needs for skills development and seek opportunities to provide the AI skill sets needed to advance the implementation of AI technology at the agency. The agency plans to take appropriate actions to retrain current staff and expand AI-enabling roles. The agency will also strategically recruit and select new AI talent as necessary.

2. Improving AI Governance

AI Governance Board

- The CSB does not currently have an AI governance board. The CSB's Chief AI Officer is responsible for engaging with agency leadership on issues related to the utilization and implementation of AI applications. The CSB will consult with other Federal and AI resources when appropriate to provide our staff with AI tools to maximize their use in the attainment of the agency's mission.

Agency Policies

- The CSB does not currently have internal AI principles, guidelines, or policy that are inconsistent with M-25-21. The agency will ensure any policies or guidelines developed are consistent with the requirement of M-25-21.

- The CSB is in the process of developing internal guidance for the use of generative AI. The agency will follow the best practices established by the CAIO council, GSA's AI working group, and industry partners to set safeguards and control mechanisms that allow generative AI to be used in the agency without presenting an unacceptable risk.

AI Use Case Inventory

- In FY 2025, the CSB conducted a technology inventory to identify AI use cases.

- Use case identification begins with CSB's Office of the Chief Information Officer (OCIO) and the Chief AI Officer. Applications, other than those provided by the Department of the Interior and the Department of the Treasury through an Interagency Agreement (IAA) are reviewed utilizing the criteria established in M-25-21. All AI applications must meet the requirements specified in M25-21 and be FedRAMP-compliant to mitigate the risk of data leakage into non-approved clouds.

- Any AI application that is not FedRAMP compliant is immediately removed from service.

- New IT applications under consideration or for applications where the requestor explicitly requires an AI application, the Chief AI Officer and the Chief Information Officer will evaluate the request to ensure all cybersecurity, data governance, and risk management issues are identified and addressed. The evaluation criteria include a review of potential impact (organization- wide vs. office/division-level), level of effort, cost, technical feasibility, performance risk, and anticipated time savings. Priority is determined based on these factors.

- At this time, the CSB has not implemented an AI application deemed high-impact under M-25-21 criteria. Should the agency consider the implementation of a high-impact AI application, the agency will conduct a formal risk assessment, develop an appropriate mitigation plan, and develop post-deployment monitoring procedures.

3. Fostering Public Trust in Federal Use of AI

Determinations of Presumed High-Impact AI

- The CSB does not currently use or have any immediate plans to use any high-impact AI as defined in Section 5 of the Appendix to M-25-21.

- Any future use of high-impact AI would follow the requirements specified in M-25-21, best practices and risk mitigation actions identified by CAIO council and other federal sources.

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