



Farm Credit Administration Artificial Intelligence Compliance Plan for OMB Memorandum M- 25-21

September 2025

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REVISION HISTORY

Date	Description of Change	Version
09/24/2024	FCA AI Compliance Plan	1.0
09/30/2025	Revised for M-25-21	2.0



PURPOSE

The AI in Government Act of 2020 (AI Act) and OMB Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*, direct each agency to submit to OMB and post publicly on the agency's website either a plan to achieve consistency with M-25-21 or a written determination that the agency does not use and does not anticipate using covered AI.

The Farm Credit Administration (FCA) is committed to ensuring the agency's use of Artificial Intelligence (AI) is designed, deployed, and used responsibly in advancing our mission to ensure that Farm Credit System institutions, including Farmer Mac, are safe, sound, and dependable sources of credit and related services for all creditworthy and eligible persons in agriculture and rural America. This document outlines how FCA plans to satisfy those requirements of M-25-21 and the AI Act applicable to a non-CFO Act¹ Federal agency.

DRIVING AI INNOVATION

Over the past years, FCA has made strategic modernization efforts including establishing scalable Information Technology infrastructure and building a knowledgeable base in AI techniques. These investments along with existing policies for identifying and deploying additional software tools will facilitate developing, testing, and maintaining AI applications.

Sharing and Reuse

FCA engages in collaboration and knowledge sharing within the agency to drive innovation and idea generation. We continue to promote the sharing and reuse of AI code, models, and data assets through the use of available development platforms and repositories designed for this purpose. To date, FCA has not identified additional resources that are required to support sharing and reuse activities.

AI Talent

Building and maintaining a skilled workforce is a key priority for the agency and crucial for advancing our AI priorities and overall innovation efforts. The agency has supported a coordinated effort across various offices to review, consider and curate training and professional development opportunities for our workforce. Understanding there is no "one-size-fits-all" approach, the agency aims to offer highly relevant AI training with curriculum designed to fit all AI experience levels within the agency. This will aid in ensuring we have an AI learning journey that is contextualized with examples for individual roles and levels.

¹ OMB memo M-25-21 and AI Act contain special provisions for agencies listed in the Chief Financial Officers Act (CFO Act) at 31 U.S.C. 901(b), of which FCA is not one.



FCA is committed to maintaining our consistently high ranking among employees when it comes to offering training opportunities on new topics such as AI, as well as ensuring employees have time to engage in AI learning.

IMPROVING AI GOVERNANCE

Agency Policies

FCA is committed to developing and updating internal AI principles, guidelines, and policies to reflect the evolving AI landscape and regulatory requirements. Currently, the agency is in the process of establishing formal internal guidance for the use of AI which will include generative AI. The agency guidance will reflect FCA's mission and ensure consistency with M-25-21 through a whole-of-government approach, elimination of innovation inhibiting practices, responsible AI adoption and training guidance, and fulfilling our obligations to secure and protect FCA's data and systems.

Key principles that will guide agency policies:

- **Accountability:** FCA will develop and implement AI in a safe and secure manner in accordance with M-25-21.
- **Data Security and Privacy:** FCA will implement appropriate safeguards when deploying AI technology and ensure that we have evaluated applicable risks and controls in accordance with internal agency guidelines.
- **Transparency:** FCA will provide visibility into AI systems we deploy.
- **Human Review:** Human review will be conducted for AI outputs in accordance with agency policies.

AI Use Case Inventory

FCA embraces transparency and right-sizing risk in how the agency is using AI. The creation and maintenance of AI use case inventories are essential to ensuring that we understand how AI technologies are being used to enable our mission and operations. Correspondingly, FCA will publish a public version of applicable AI use cases on FCA's website in accordance with the guidance outlined in M-25-21.

AI use cases may be identified from across FCA at all levels from individual users to the executive team. Identified use cases are considered through existing FCA processes, evaluated by existing advisory or decisioning bodies, and will be entered into FCA's AI use case inventory as appropriate. FCA's approach to maintaining a comprehensive, complete, and accurate inventory leverages input from cross-agency stakeholders and agency processes involving business capability implementation practices where technology and data serve key enabling roles. Where applicable, FCA plans to update these processes to reflect areas where AI use cases introduce new and unique considerations.



FOSTERING PUBLIC TRUST IN FEDERAL USE OF AI

Determinations of Presumed High-Impact AI

FCA is committed to the responsible use of AI that has been identified as high-impact AI. Currently, the agency is establishing a process for determining which AI use cases meet the definition of high-impact AI as defined in Section 5 of the Appendix to M-25-21.

- **Review Process:** Proposed AI use cases are evaluated against the definition of high-impact AI as part of FCA's AI use case implementation process.
- **Criteria for Assessment:** To date, the agency has not defined additional criteria.
- **Waivers:** Where applicable, FCA will consider waivers for minimum risk management practices. Consideration actions include issuing, denying, revoking, certifying, and tracking waivers.

To date, the agency does not have and does not anticipate any AI use cases that meet the definition of high-impact AI.

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

As the agency moves forward, minimum risk management practices for AI uses, including controls to prevent non-compliant high-impact AI from being deployed, are being defined as part of the agency's process for evaluating and deploying covered AI capabilities. This process will include documenting and validating implementation of those practices.

- **Risk Assessments:** Conduct risk assessments for AI applications.
- **Risk Management Practices:** Document and validate the implementation of risk management practices.
- **Risk Management Framework:** Outline procedures for assessing and addressing AI-related risks. If non-compliant high-impact AI systems are discovered, adhere to agency procedures for termination.

At this time, FCA has not identified any non-compliant AI use that would require termination.

The agency CAIOs provide oversight of risk management, while designated agency AI leads are accountable for implementing those requirements.