

Social Security Administration Compliance Plan for OMB Memorandum M-25-21 – September 2025



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1. Driving AI Innovation

Removing Barriers to the Responsible Use of AI

- Describe any barriers to your agency’s responsible use of AI, and any steps your agency has taken (or plans to take) to mitigate or remove these identified barriers.

The Social Security Administration (SSA) is addressing barriers to responsible AI use by focusing on five strategic areas: business value realization, workforce capacity, technical infrastructure, data quality, and governance. These efforts are documented in the agency AI Strategy. As a part of this strategy the agency developed a Responsible AI Implementation Framework to guide teams through ethical and compliant AI development. The Responsible AI Core Team supports use case teams and ensures alignment with federal guidance. To build trust and understanding, SSA will provide role-based training and engages staff through an internal AI communication hub. SSA is actively adding access to secure, scalable AI platforms, open-source tools, and monitoring capabilities integrated into the agency enterprise architecture, to enable rapid development and deployment. These efforts collectively enable SSA to responsibly scale AI innovation while safeguarding data, ensuring transparency, and advancing the agency’s mission.

Sharing and Reuse

- Explain how your agency coordinates internally to promote the sharing and reuse of AI code, models, and data assets. Describe the resources needed to further enable this type of activity.

SSA is exploring the centralization of SSA code sharing and shared AI platforms to provide a common set of tools and jump start AI development. Additionally, SSA maintains an internal AI Community of Interest that fosters collaboration and knowledge sharing.

In accordance with open data policies, SSA will share data with parties that require it for business purposes in accordance with respective laws and confidentiality standards. The Chief Data Officer, in coordination with other agency senior officials, ensures the public sharing of data through the Social Security Data Page, in accordance with the Office of Management and Budget (OMB) M-13-13 Open Data Policy. This initiative promotes accessibility and facilitates the use of SSA’s data by the public, to the extent permitted by applicable law.

Similarly, SSA upholds its commitment to transparency and open government by making code publicly available to the extent permitted by applicable law through the SSA Open Source Code Site. This practice aligns with the SSA Open Government Plan.

Resources needed to continue this work include an expanded AI workforce capacity, expanded infrastructure, improved AI ready data, and expanded risk mitigations for High-Impact use cases. SSA remains committed to fostering a culture of collaboration and transparency in its AI efforts, ensuring that AI innovations are responsibly shared and reused to advance the agency's mission and serve the public effectively.

AI Talent

- Describe any planned or in-progress initiatives from your agency to enhance AI talent. In particular, identify the AI skillsets needed at your agency and where individuals with technical talent could have the most impact.

SSA is actively developing internal AI talent through a combination of online, role-based training, instructor-led courses, and an internal AI Community of Interest that fosters collaboration and knowledge sharing. These efforts are designed to build both technical and non-technical competencies across the agency. Key skillsets needed include executive awareness of AI's strategic value, technical expertise in areas like machine learning and data science, and a broad understanding of AI risks such as bias and data privacy. SSA's approach ensures that staff are equipped to responsibly develop, manage, and apply AI to support high-priority mission needs, while cultivating a culture of innovation and ethical AI use.

2. Improving AI Governance

AI Governance Board

- Describe your agency's AI governance body and the plan to achieve its expected outcomes. In particular, identify the offices that are represented on your agency's AI governance board and describe how, if at all, your agency's AI governance board plans to consult with external experts or across the Federal Government.

SSA's AI governance board, chaired by the Chief AI Officer, includes senior leaders from key offices such as IT, data, legal, privacy, and operations. The board provides strategic oversight to ensure AI is used in alignment with agency priorities and developed responsibly and ethically. The board reviews high-risk use cases and supports risk management. The board and the Responsible AI Core Team will leverage integrators and external partners as necessary to stay at the forefront of AI advancements that benefit our unique mission while maintaining rigorous oversight and data protection. By actively seeking input and collaboration, the AI governance body within the agency ensures that its decision-making processes are well-informed, consistent with applicable law, and benefit from a diverse range of perspectives.

Agency Policies

- Describe any planned or current efforts within your agency to update any existing internal AI principles, guidelines, or policy to ensure consistency with M-25-21.

SSA has updated its internal AI policies to align with OMB M-25-21, including the issuance of enterprise-wide guidance emphasizing responsible AI use. The Responsible AI Core Team oversees the implementation of SSA's Responsible AI Framework, which ensures AI initiatives meet federal standards across the lifecycle. The Responsible AI Core Team works in collaboration with legal, data, and cyber security to align policy and official guidance and reduce compliance burden and potential overlap. These efforts are supported by updates to IT, data, privacy, and cybersecurity policies to facilitate secure, ethical, and mission-aligned AI adoption.

- **Identify whether your agency has developed (or is in the process of developing) internal guidance for the use of generative AI.**

SSA is actively developing internal guidance for the responsible use of generative AI, with a strong focus on safeguarding sensitive data and minimizing risk. Due to the potential severe consequences that could arise from unauthorized data disclosure, protecting SSA's data assets is of utmost importance. As a data-centric organization, SSA places a high priority on the security, integrity, and privacy of its systems and data.

SSA aims to strike a balance between leveraging the benefits of generative AI and protecting the security and privacy of its data assets. The agency remains committed to ensuring that generative AI is used responsibly and without posing undue risk.

AI Use Case Inventory

- **Describe your agency's process for soliciting and collecting AI use cases across all subagencies, components, or bureaus for the inventory. In particular, address how your agency plans to ensure your inventory is comprehensive, complete, and encompasses updates to existing use cases.**

SSA maintains a comprehensive AI use case inventory through a structured, agency-wide process led by the Responsible AI Core Team on behalf of the Chief AI Officer. The team solicits input from all components using standard communication channels, ensuring broad awareness and accountability. Responses are reviewed and refined through follow-up to confirm completeness and accuracy, including updates to existing use cases. Each use case is validated at least annually, and the final inventory is reviewed by the Chief AI Officer and AI Governance Board prior to publication. This process ensures the inventory remains current, complete, and aligned with federal reporting requirements.

3. Fostering Public Trust in Federal Use of AI

Determinations of Presumed High-Impact AI

- **Explain your agency's process to determine which AI use cases are high-impact.**

SSA determines whether an AI use case is high-impact through a structured evaluation process led by the Chief AI Officer and the Responsible AI Core Team. Each use case is reviewed in consultation with its owners and relevant experts to assess whether it meets the criteria outlined in OMB M-25-21. Specifically, SSA evaluates whether the AI output is a principal basis for a decision, whether it affects specific individuals or entities, and whether it has a legally or materially significant impact on civil rights, privacy, or access to critical services. This process ensures consistent, risk-informed determinations aligned with federal definitions and agency priorities.

- **If your agency has developed its own distinct criteria to guide a decision to waive one or more of the minimum risk management practices for a particular use case, describe the criteria.**

SSA has not developed its own criteria to waive one or more of the minimum risk management practices provided by OMB. SSA follows the criteria outlined in OMB M-25-21.

- **Describe your agency's process for issuing, denying, revoking, certifying, and tracking waivers for one or more of the minimum risk management practices.**

The Chief AI Officer, in collaboration with the Responsible AI Core Team, will conduct evaluations and make determinations based on the requirements set forth in OMB M-25-21. These evaluations will consider the specific circumstances and needs of each system or use case.

Based on these evaluations, the Chief AI Officer, supported by the Responsible AI Core Team, will determine whether to issue, deny, or certify waivers for each use case's minimum risk management practices. This decision-making process ensures that appropriate considerations are made to balance the need for flexibility with the importance of risk management.

Any waivers that are granted will be properly tracked and documented and reported to OMB and the public. This tracking mechanism ensures that waivers are accounted for and can be monitored for compliance and ongoing evaluation.

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

- **Identify how your agency plans to document and validate implementation of the minimum risk management practices.**

SSA assigns responsibility for implementing and documenting minimum risk management practices to AI use case owners, who follow the agency's Responsible AI Framework and enterprise risk management standards. Use case owners are required to produce governance artifacts that demonstrate compliance and risk mitigation throughout the AI lifecycle. The Responsible AI Core Team monitors adherence to these practices and validates their effectiveness.

- **Elaborate on the controls your agency has put in place to prevent non-compliant high-impact AI from being deployed to the public.**

SSA has established safeguards to prevent the deployment of non-compliant high-impact AI. The Responsible AI Framework embeds compliance checkpoints and risk assessments, requiring documentation and review of risk artifacts before deployment. Additionally, SSA enforces its Authority to Operate (ATO) process, which ensures that only systems meeting strict standards for security, privacy, legality, and alignment with federal values are approved for public use.

- **Describe your agency's intended process to terminate, and effectuate that termination of, any non-compliant AI.**

SSA's Chief AI Officer, in coordination with relevant stakeholders, is responsible for assessing and executing the termination of any non-compliant AI system. The process includes evaluating operational impacts, determining an appropriate timeline, and ensuring minimal disruption to agency services. Once a decision is made, the AI system is disabled or removed, and any related data or dependencies are handled securely. This approach ensures timely, effective termination while maintaining compliance and operational integrity.