U.S. International Trade Commission Compliance Plan for OMB Memoranda M-24-10 — September 2024

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1. STRENGTHENING AI GOVERNANCE

General

The U.S. International Trade Commission (USITC) has convened an AI Governance Board (AIGB) to develop and update enterprise-wide AI-governance standards, policies, and strategies.

AI Governance Bodies

USITC recognizes the potential of using AI technology and established an AIGB to oversee the development, implementation, and updating of internal AI principles, guidelines, and policy.

The following offices are represented on the USITC AIGB: Chief Administrative Officer, Chief Financial Officer, Chief Information Officer, Chief Operating Officer, General Counsel, Internal Control and Risk Management, and Equal Employment Opportunity.

The AIGB has the authority to develop and implement a standardized, programmatic approach to managing AI use cases; develop and implement agency-wide AI processes and standards; develop and maintain an enterprise-wide inventory of AI assets and use cases; develop and coordinate the implementation of the USITC AI Strategy; conduct strategic reviews of AI-governance activities; and issue an AI Governance Manual.

The AIGB does not have plans to consult with external experts. The AIGB will re-examine this need if necessary.

AI Use Case Inventories

The USITC will use input from working groups subordinate to its AIGB to create and maintain an empirical inventory of AI use cases throughout the Commission. AI asset owners will be required to certify use cases associated with their offices, with final approval and oversight carried out by the AIGB.

Reporting on AI Use Cases Not Subject to Inventory

The Commission does not have any AI use cases not subject to inventory, as described in Section 3(a)(v) of M-24-10, nor does it expect to have such use cases in the future.

2. ADVANCING RESPONSIBLE AI INNOVATION

AI Strategy

While not required, the USITC plans to develop an enterprise strategy to advance the responsible use of AI to provide for the integration of AI where appropriate, identify and remove barriers to AI use, and establish operational and governance processes to manage AI-related risks.

3. MANAGING RISKS FROM THE USE OF ARTIFICIAL INTELLIGENCE

Determining Which Artificial Intelligence Is Presumed to Be Safety-Impacting or Rights-Impacting

The USITC will implement a thorough risk and impact assessment throughout the life cycle of all AI assets. For each proposed AI application, the potential AI asset owner is required to indicate any potential impact on rights and safety. The CAIO and AIGB will conduct an independent review and evaluation of each proposed use case before recommending its use in the Commission's operation. AI asset owners are required to monitor AI applications' performance and impact throughout their life cycle.

The USITC is not currently using, and does not anticipate using, any AI that impacts safety or rights. The USITC does not allow waivers of the minimum risk management practice and has no plans to develop criteria for such waivers.

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

Although the USITC is not currently and does not anticipate using any AI that impacts safety or rights, all proposed AI use cases will receive screening and review by the AIGB before deployment to ensure they do not impact safety or rights.

Minimum Risk Management Practices

Minimum risk management practices, including completing an AI impact assessment, testing AI performance, and independently evaluating AI, among other practices, will be codified in the processes developed by the AIGB.