

Updated: September 2024

# A CDAO Perspective: Safe, Secure, and Trustworthy AI

On October 30, 2023, President Joe Biden signed [an Executive Order \(EO\)](#) on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence. The EO built on the administration's work that led to voluntary commitments from leading companies to drive safe, secure, and trustworthy development of AI and directed federal agencies to take certain actions to incorporate and govern AI in their missions. Federal agencies have reported completing all the 150-day actions required by the EO since completing the 90-day actions. On March 28, 2024, the [Office of Management and Budget \(OMB\)](#) produced its first government-wide policy for managing AI risks and harnessing AI's benefits. For key tenants, refer to the [EO Fact Sheet](#) and the [OMB Guidance Fact Sheet](#). On August 14, 2024, [final guidance](#) was released requiring agencies to submit their AI use case inventories to OMB for public reporting.

Government Chief Data Officers (CDO) and data leaders play a critical role preparing their organizations for the safe, secure, and trustworthy application for AI. **Government CDOs may face challenges and opportunities to improve their organization's data and operations for enhanced, equitable, and innovative applications of AI.**

The **following key themes for CDOs** exist in an evolving landscape of federal guidance on AI adoption and do not capture the extent of the data-specific requirements within the EO and accompanying OMB Guidance.

## DESIGNATING A CHIEF ARTIFICIAL INTELLIGENCE OFFICER (CAIO)

### OMB POLICY REVIEW

"Within **60 days** of the issuance of the [October 2023 memorandum](#), the head of each **agency must designate a Chief Artificial Intelligence Officer (CAIO).**" ([OMB M-24-10 Section 3.b.i](#))

The **primary responsibility for CAIOs** is "coordinating their agency's use of AI, promoting AI innovation, managing risks from the use of AI, and carrying out the agency responsibilities..." ([OMB M-24-10 Section 3.b.ii](#))

### WHAT TO DO NEXT

The formal introduction of the CAIO prompts an immediate step to ensure the careful coordination between the responsibilities designated for CDOs, CDAOs and those required for CAIOs and to make the proper designations for the relevant department. This will differ based on the agency's current designations and considerations and may involve designating the existing CDO as the CAIO.

Expanded or new notable CAIO responsibilities include a) ensure AI code and data used for AI are "appropriately inventoried, shared, and released in agency code and data repositories", b) developing AI risk management guidance, c) instituting governance to remain compliant, working on resourcing requirements and recommending investment areas to build enterprise capacity, and d) sharing relevant information with agency officials involved in agency AI policymaking initiatives.

**Action:** Evaluate existing responsibilities and coordinate the role of CDOs, CDAOs, and CAIOs to use, promote, and manage risks for the agency's use of AI

## HIRING AI TALENT AND PROVIDING AI TRAINING

### POLICY REVIEW

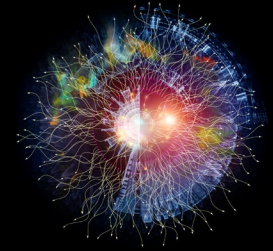
"...agencies are strongly encouraged to prioritize recruiting, hiring, developing, and retaining **talent in AI and AI-enabling roles** to increase enterprise capacity for responsible AI innovation." ([OMB M-24-10 4.c](#))

### WHAT TO DO NEXT

CDOs can take advantage of this focus on hiring AI talent and AI-enabling talent to energize existing efforts towards building data fluency and upskilling their workforce for the use of AI. Data fluency is a foundational element to prepare an organization's workforce and data for the effective use of AI solutions. CDOs can use OMB's forthcoming AI and Tech Hiring Playbook as a resource and coordinate with the newly required AI Talent lead for the AI Talent Task Force.

**Action:** CDOs can focus on incorporating AI fluency into existing data literacy training programs to upskill their workforce and prepare to engage new AI talent.

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## CONNECTING NEW AI STRATEGIES TO DATA STRATEGY

### POLICY REVIEW

"Within 365 days of the issuance of the [October 2023 memorandum](#), each CFO Act agency **must develop and release publicly...a strategy for identifying and removing barriers to the responsible use of AI...**" ([OMB M-24-10 Section 4.a](#)).

**"Any data** used to help develop, test, or maintain AI applications, regardless of source, **should be assessed for quality, representativeness, and bias.**" ([OMB M-24-10 Section 4.a.ii](#))

### WHAT TO DO NEXT

To develop AI strategies and pursue high-impact AI use cases, CDOs should review existing data strategies with a focus on data infrastructure for AI and workforce readiness. Strategies should connect on the agency's top opportunities for AI, plans to increase AI capacities and AI maturity, improvements for practitioner AI and data literacy, and effective governance of AI usage.

To advance responsible AI innovation, the EO and accompanying OMB guidance focus on several data actions CDOs can take to remove barriers, including **developing adequate infrastructure and curated agency data sets, maximizing access to internal data, and encouraging public access datasets.**

**Action:** Assess current data strategies and implementation efforts to identify AI strategies and AI use cases, with attention to organizational AI maturity, data literacy, and governance.

## MANAGING RISKS FOR RIGHTS-IMPACTING AND SAFETY-IMPACTING AI

### POLICY REVIEW

"Within 60 days of the issuance of the [October 2023 memorandum](#), each CFO Act agency **must convene an agency AI Governance board**" ([OMB M-24-10 Section 3.a.ii](#))

**"...all agencies are required to implement minimum practices...to manage risks** from safety-impacting AI and rights impacting AI." ([OMB M-24-10 Section 5](#))

This includes specific actions, for example on terminating non-compliant AI, determining which AI is safety-impacting or rights impacting, and minimum practices for safety or rights-impacting AI.

**"Agencies must assess the quality of the data** used in the AI's design, development, training, testing, and operation and its fitness to the AI's intended purpose." ([OMB M-24-10 Section 5.c.iv.A.3](#))

### WHAT TO DO NEXT

CDOs may participate in AI Governance Boards (with senior officials to govern the use of AI) as a representative responsible for data's role as a key enabler and risk factor in AI adoption.

Agencies must review current or planned AI use to assess whether it meets the definition of safety or rights-impacting AI, part of which asks if the AI output "serves as a principal basis for a decision or action." While it is ultimately the determination of the CAIO, the CDO may support determining which AI is safety-impacting or rights-impacting.

**By December 1, 2024,** Organizations will be required to document data assessments and other data-related activities in an **AI Impact Assessment, required to be updated and leveraged throughout the AI's lifecycle.** As part of the minimum practices prescribed for safety-impacting or rights-impacting AI, policy continues to focus on properly documenting the agency's data use for AI, the use of AI **adequately representing communities** and including activities such as monitoring for **improper bias and AI-enabled discrimination.**

**Action:** CDOs can recognize their critical role in the AI impact assessment, ensuring the organization is prepared with the appropriate data infrastructure and data quality needed for trustworthy AI.

## FEDERAL CDO INSIGHTS

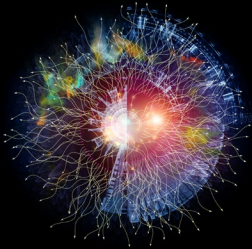
For or agencies that are already utilizing AI as an accelerator or preparing for its use, CDOs play a unique role across innovating with AI and managing the potential barriers and risks tied to the safe, secure, equitable and trustworthy utilization of AI. For more insights on the CDO role and CDO community needs, check out "[The Mission-Driven CDO: Insights from the 2023 Survey of Federal Chief Data Officers](#)".





# A CDAO Perspective:

## Safe, Secure, and Trustworthy AI



### PUBLIC REPORTING OF AI USE CASES

#### POLICY REVIEW

“By December 16, 2024, each agency (except for the Department of Defense and agencies in the Intelligence Community) must:

1. “Annually submit an inventory of its AI use cases to OMB...”
2. “Subsequently post a consolidated, machine-readable CSV of all publicly releasable use cases on their agency’s website ...” (EO 14110, 2.a.1 and 2a.2)

#### WHAT TO DO NEXT

To support transparency, agencies must send an inventory of their use cases to OMB. These use cases will be reported publicly.

Exceptions include research and development use cases, one-time stand-alone use cases, use cases by the Department of Defense, use cases within a National Security System or within the intelligence community, and use cases for which public reporting is inconsistent with federal law or government wide policy.

**Action:** For each qualifying use case in the inventory, complete a form at <https://collect.omb.gov/site/212/home-page>. Next post a machine-readable CSV of all publicly releasable use cases on their agency’s website at [agency.gov]/ai.

For non-reportable use cases, agencies must keep an inventory and report aggregate metrics to <https://collect.omb.gov/site/212/home-page>.

### FEDERAL CDO INSIGHTS



For or agencies that are already utilizing AI as an accelerator or preparing for its use, CDOs play a unique role across innovating with AI and managing the potential barriers and risks tied to the safe, secure, equitable and trustworthy utilization of AI. For more insights on the CDO role and CDO community needs, check out “[The Mission-Driven CDO: Insights from the 2023 Survey of Federal Chief Data Officers](#)”.



## A CDAO Perspective: Safe, Secure, and Trustworthy AI



### CONNECT & INNOVATE TOGETHER



### ADDITIONAL SOLUTIONS AND ACCELERATORS



#### CDAO Services

Support Chief Data Officers and other data leaders to enable and improve data-driven organizations through services like data governance, literacy, and strategy.

**Identify:** Data requirements, data sources, insights, and value

**Discover & Prep:** Assess Risks, and develop the Data and Insights Strategy

**Design & Build:** Manage the data value chain; procure, ingest, and store

**Launch & Integrate:** Develop delivery models, governance, and operations

**Monitor & Mature:** Support, enhance, and scale data and insights services

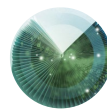
#### ► Suite of CDO, Data, and AI Labs

A one-day experience designed to—establish a common understanding of the aspirations and challenges of the CDAO's team and key stakeholders and develop a 180-day plan to drive the CDAO's priorities.



#### CDO Playbook

See the most recent thought leadership of CDOs in the government based on trends and understanding for AI priorities, AI Strategies and implementation of operating models



#### Government AI Use Case Dossier

See what's working for other agencies and consider the ways AI can advance your mission with the Government and Public Services Sector AI Use Case Dossier.



#### CAIO Transition Lab

Refine the CAIO role requirements, establish effective governance approaches, and create a transition plan to empower a new CAIO through a specialist guided experience.



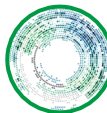
#### Trustworthy AI™

Understand seven key areas of risk for AI and keep your use of AI safe and ethical with Deloitte's Trustworthy AI™ framework in line with NIST.



#### AI and Data Strategy Services

Align on an organizational vision for AI, prioritize AI use cases, and make strategic choices about where to invest in AI, accelerated by Playbooks and immersive Labs guided by experienced facilitators.



#### AI Readiness & Management Toolkit

Apply our framework and tools to assess current state, define future state, and chart a path forward to build AI maturity across workforce, data, and technology.



#### GovConnect AI Ready Data Foundation

Suite of services designed to assist government agencies in building and managing modern, cloud integrated data ecosystems, enabling the delivery of AI at scale.

### Contacts

Deloitte supports many Federal clients in the data and AI space. With best-in-class AI advice and capabilities, We can help at each stage of the race, providing Chief Data Officers with the CDAO Services they need to navigate changing regulation and the safe, secure, and trustworthy application of AI. Reach out for a consultation or to ask about our approach to the new executive branch AI guidance.



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