FΛS FEDERATION OF AMERICAN SCIENTISTS

FAS@FAS.ORG
FAS.ORG

FEDERATION OF AMERICAN SCIENTISTS
1150 18TH STREET NW, SUITE 1000
WASHINGTON, DC 20036

Mr. Russell Vought
Director of the Office of Management and Budget
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Mr. Michael Kratsios
Assistant to the President for Science and Technology
The Office of Science and Technology Policy
1650 Pennsylvania Avenue NW
Washington, DC 20502

March 6, 2025

Dear Mr. Vought and Mr. Kratsios,

As you work to review current Office of Management and Budget (OMB) policies on artificial intelligence (AI), we, the undersigned organizations, urge you to uphold the guidance outlined in OMB Memorandum M-24-10, ensuring that federal agencies maintain and update their AI Use Case Inventories at their current level of detail. This initiative, which was started under the first Trump administration, is key in promoting transparent, efficient, and trustworthy AI adoption across the federal government and encouraging a robust and competitive ecosystem of public innovation.

The federal government's approach to deploying AI systems is a defining force in shaping industry standards, academic research, and public perception of these technologies. Public sentiment toward AI remains mixed, with many Americans expressing a lack of trust in AI systems.[1] To derive benefits from AI systems, the public must have confidence that these systems are deployed safely and benefit their lives and livelihoods. While there is general support for AI governance and management, trust in both tech companies and government agencies to use AI safely remains low.[2] This underscores the need for clear policies, robust training, and transparency mechanisms to ensure AI is used in a way that aligns with public expectations and American values.

The first Trump Administration's AI policies clearly recognized the opportunity to promote AI adoption through transparency and public trust. President Trump's Executive Order 13859 explicitly stated that agencies must design, develop, acquire, and use "AI in a manner that fosters public trust and confidence while protecting privacy, civil rights, civil liberties, and American values,"[3] while OMB guidance M-21-06, also issued during the first Trump administration, highlighted that "transparency and disclosure can increase public trust and confidence in AI applications."[4] A pillar of those policies was the federal agency AI Use Case Inventories, established by President Trump's Executive Order 13960[5] and

---

[1] Grossman, G. (2024, March 28). Rebuilding trust to reach AI's potential. Edelman. https://www.edelman.com/insights/rebuilding-trust-reach-ai-potential

[2] Edelman. (2025). *2025 Edelman Trust Barometer: Trust and the Crisis of Grievance*. Edelman. https://www.edelman.com/trust/2025/trust-barometer/report-tech-sector

[3] Executive Office of the President. (2019, February 11). *Executive order on maintaining American leadership in artificial intelligence (Executive Order No. 13859).* Federal Register. https://www.federalregister.gov/documents/2019/02/14/2019-02544/maintaining-american-leadership-in-artificial-intelligence

[4] Office of Management and Budget. (2020, November 17). Guidance for regulation of artificial intelligence applications (M-21-06). Executive Office of the President. https://trumpwhitehouse.archives.gov/wp-content/uploads/2020/11/M-21-06.pdf

[5] Executive Office of the President. (2020, December 3). *Executive order on promoting the use of trustworthy artificial intelligence in the federal government (Executive Order No. 13960).* Federal Register.

FAS FEDERATION OF AMERICAN SCIENTISTS

FAS@FAS.ORG
FAS.ORG

FEDERATION OF AMERICAN SCIENTISTS
1150 18TH STREET NW, SUITE 1000
WASHINGTON, DC 20036

codified through the Advancing American AI Act, which passed into law in 2023 as part of the National Defense Authorization Act.[6] Recognizing the importance of the inventory approach, OMB Guidance M-24-10 and the related August 2024 additional reporting guidance expanded these inventories by aligning the definition of AI with Section 238(g) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 and introducing critical distinctions between different types of AI systems: basic AI, AI in development, and high-impact AI systems.[7,8,9] The end of 2024 marked a major leap in government transparency regarding AI use. Agency reporting on AI systems saw dramatic improvements, with federal AI Use Case Inventories capturing more than 1,700 AI use cases—a 200% increase in reported use cases from the previous year.[10] These inventories are also essential to ensuring that OMB can fulfill its mandate under the AI in Government Act of 2020 of improving the cohesion and competency of AI adoption in the federal government and facilitating the adoption of best practices to mitigate unintended consequences of AI.[11]

At its current level of detail, federal agency AI Use Case Inventories foster public trust and innovation by:

- Enhancing Accountability: By disclosing the details of AI deployments, the inventory enables policymakers, industry, and the public to monitor government AI use and ensure taxpayer money is spent wisely and consistently with American values.
- Tracking AI Successes & Impacts: The inventory allows agencies to identify successful AI implementations and demystify the technology's use while also monitoring systems that may pose reputational, adverse, or operational impacts – giving more confidence to citizens on how AI is improving their government services.
- Supporting AI Vendors & Industry Engagement: The inventory provides visibility into the government's AI needs, thus helping businesses and technology providers tailor their solutions to government priorities and fostering innovation in public-sector AI.

To maintain these benefits, the federal government should uphold its 2024 guidance on federal agency AI Use Case Inventories and ensure agencies have the necessary resources to complete it effectively. By leveraging its deployment of AI responsibly, the government

---

https://www.federalregister.gov/documents/2020/12/08/2020-27065/promoting-the-use-of-trustworthy-artificial-intelligence-in-the-federal-government

[6] Congress of the United States. (2022). National Defense Authorization Act for fiscal year 2023. Pub. L. No. 117-263, § 7225. https://www.congress.gov/bill/117th-congress/house-bill/7776/text

[7] Office of Management and Budget. (2024, March 28). *Advancing governance, innovation, and risk management for agency use of artificial intelligence (M-24-10).* Executive Office of the President. https://bidenwhitehouse.archives.gov/wp-content/uploads/2024/03/M-24-10-Advancing-Governance-Innovation-and-Risk-Management-for-Agency-Use-of-Artificial-Intelligence.pdf

[8] CIO Council. (2024, August 14). Guidance for 2024 Agency Artificial Intelligence Reporting per EO 141110. https://www.cio.gov/assets/resources/2024-Guidance-for-AI-Use-Case-Inventories.pdf

[9] Congress of the United States. (2018). *John S. McCain National Defense Authorization Act for Fiscal Year 2019.* Pub. L. No. 115-232, § 238(g). https://www.congress.gov/bill/115th-congress/house-bill/5515

[10] Alder, M. (2024, December 18). Federal government discloses more than 1,700 AI use cases. FedScoop. https://fedscoop.com/federal-government-discloses-more-than-1700-ai-use-cases/

[11] U.S. Congress. (2020). *H.R.2575 - AI in Government Act of 2020.* 116th Congress. https://www.congress.gov/bill/116th-congress/house-bill/2575/all-actions

FΛS FEDERATION OF AMERICAN SCIENTISTS

FAS@FAS.ORG
FAS.ORG

FEDERATION OF AMERICAN SCIENTISTS
1150 18TH STREET NW, SUITE 1000
WASHINGTON, DC 20036

can encourage high-quality AI solutions that both enhance public services and establish a strong precedent for innovation, accountability, and trust.

We urge you to support the continuation of existing agency reporting guidance for federal AI Use Case Inventories. As the federal government seeks to increase its implementation of AI solutions in the coming years, these reporting practices for AI use cases are an essential tool for building trust, tracking outcomes, and informing innovation in the industry.

Sincerely,

Federation of American Scientists

Beeck Center for Social Impact + Innovation at Georgetown University

Bonner Enterprises, LLC

Center for AI and Digital Policy

Center for Democracy & Technology

Center for Inclusive Change

CUNY Public Interest Tech Lab

Electronic Frontier Foundation

Environmental Policy Innovation Center

Mozilla

National Fair Housing Alliance

NETWORK Lobby for Catholic Social Justice

New America's Open Technology Institute

POPVOX Foundation

Public Citizen

SeedAI

The Governance Lab