



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL
WASHINGTON, DC 20420



**Department of Veterans Affairs (VA) Office of Inspector General (OIG) Compliance Plan
for the Office of Management and Budget (OMB)
Memorandum M-25-21 – September 2025**

Issued by Kate Doyle Feingold, Acting Assistant Inspector General

1. Driving AI Innovation

Removing Barriers to the Responsible Use of AI

The VA OIG continues to seek out opportunities to provide high-quality training to its authorized employees to master the skills and resources needed to develop, test, implement, and oversee AI use cases.

Sharing and Reuse

Internally, the OIG has three established groups—an AI community of practice, an AI development working group, and an AI subcommittee—that hold recurring meetings to encourage collaboration among personnel and to share AI-related resources such as data, technical infrastructure, algorithms, and prebuilt models.

AI Talent

Some employees with technical expertise develop algorithms and models for AI use cases. Employee developers are also empowered to leverage AI tools to support authorized programming activities. To further strengthen internal capabilities, high-caliber development opportunities are actively sought to keep pace with evolving needs.

2. Improving AI Governance

AI Governance Board

The VA OIG's AI subcommittee is composed of senior leaders and specialists in IT, the relevant law, and privacy concerns, as well as stakeholders from across the enterprise. This subcommittee is tasked with reviewing, discussing, and monitoring AI use cases across the office. The subcommittee regularly consults with external experts and sources to ensure VA OIG guidance, and the related framework reflect the latest guidance on AI implementation.

Agency Policies

AI guidance was issued in 2024 with multiple updates over the past eight months that are responsive to executive orders. The guidance also reflects the policy and requirements from OMB M-25-21. Additional updates are expected to remain current with future mandates and developments.

AI Use Case Inventory

The VA OIG maintains an internal AI webpage that provides employees with access to the use case submission questionnaire, guidance materials, and training opportunities. All VA OIG employees are required to complete the questionnaire as the initial step in obtaining approval for any new AI use case. This process ensures the use case inventory remains comprehensive and up to date.

3. Fostering Public Trust in Federal Use of AI

Determinations of Presumed High-Impact AI

The VA OIG currently does not have any AI use cases that are considered high-impact as defined in OMB M-25-21. The AI subcommittee's senior leaders and subject matter experts oversee the process for reviewing and assessing use cases. They discuss proposed use cases in detail and assess whether they meet the definition of high-impact. The OIG does not have a waiver process and does not plan to waive the minimum risk management practices for AI use cases.

Implementation of Risk Management Practices and Termination of Noncompliant AI

The VA OIG does not have AI use cases that are deployed to the public. The process for implementing risk management practices is to test before deployment and to conduct AI assessments for all potential high-impact AI use cases. The process includes ensuring there are effective plans for ongoing monitoring that are clearly outlined prior to implementation. These steps are completed by the AI subcommittee, which also has the authority to rescind approval for any noncompliant AI use cases.