



Federal Maritime Commission

AI Compliance Plan (FY 2026–2028)

Change Log

Date	Description of Changes	Initials
August 2025	Initial Draft Release	JB
TBD	Plan Approved	

Table of Contents

Executive Summary	4
Purpose & Scope	4
Strategic Vision and Goal	4
1. Driving AI Innovation.....	5
1.1 Removing Barriers to Responsible AI Use	5
1.2 Sharing and Reuse of AI Assets and Data	5
1.3 AI Talent Development.....	5
2. Improving AI Governance	6
2.1 AI Governance Body	6
2.2 Agency AI Policies	6
2.3 AI Use Case Inventory.....	6
3. Fostering Public Trust	7
3.1 Determinations and Waivers for High-Impact AI	7
3.2 Implementation of Minimum Practices and Termination of Non-Compliant AI	7
4. Workforce and Culture	7
Appendix A. Milestones	8

Executive Summary

Artificial Intelligence (AI) is reshaping the ocean shipping industry. To comply with OMB Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*, the Federal Maritime Commission (FMC or Commission) will adopt AI responsibly, transparently, and cost-effectively. This plan establishes governance and oversight mechanisms, sets out processes for AI determinations, waivers, inventories, and public reporting, aligns acquisitions with OMB M-25-22 requirements, and aligns principles of truth-seeking and ideological neutrality with OMB M-26-04 requirements. All AI-related materials for public posting will be located at fmc.gov/ai.

Consistent with the Commission's mission to foster a fair, efficient, and competitive ocean transportation system, AI adoption will strengthen oversight, improve data-driven analysis, and enhance protections for the shipping public. By responsibly leveraging AI, the FMC will be better positioned to identify market trends, detect potential misconduct, and provide timely and transparent information that advances the agency's statutory responsibilities.

Purpose & Scope

This compliance plan fulfills § 104(c)-(d) of the AI in Government Act of 2020 and § 3 (b)(ii) of OMB M-25-21, which require every federal agency either to publish an AI plan or to declare that it has no covered AI use. This plan sets out the Commission's policy for adopting, acquiring, and overseeing AI, including generative AI, across all mission and business functions.

The scope extends to all employees, contractors, information systems, and procurements that develop, purchase, or operate AI capabilities. Any AI application used to inform regulatory, enforcement, financial, or workforce decisions is subject to the governance and risk management processes described herein.

The compliance plan will be reviewed every two years or as needed to keep pace with technology and policy. Updates will draw on lessons from pilots, audits, and the interagency Chief Artificial Intelligence Officer Council (CAIO Council or Council).

Strategic Vision and Goal

The Federal Maritime Commission will adopt proven, reliable AI tools to strengthen oversight of ocean-shipping markets while steadfastly protecting privacy, security,

and civil liberties. AI capabilities will be introduced through a phased, risk-informed rollout, so that workforce readiness, mission value, and oversight safeguards advance together. All AI-enabled data flows and decisions will comply fully with applicable federal laws, Office of Management and Budget guidance, and Commission directives.

1. Driving AI Innovation

1.1 Removing Barriers to Responsible AI Use

The Commission recognizes that responsible adoption of AI can be slowed by challenges such as fragmented data, limited secure testing environments, gaps in staff expertise, and existing policy constraints. To mitigate these barriers, the Commission will expand approved cloud sandboxes for piloting AI tools, standardize data within agency data systems, catalog datasets in a metadata governance platform, and update internal policies on IT, cybersecurity, privacy, and records management. Targeted training will build staff expertise in applied machine learning, prompt engineering, and model evaluation.

1.2 Sharing and Reuse of AI Assets and Data

The Commission will promote the reuse of AI models, prompts, and code by cataloging them internally and sharing them through appropriate outlets, including the Commission's internal Azure DevOps instance and OMB's MAX AI Hub. The Chief Artificial Intelligence Officer (CAIO), working with the Chief Data Officer, Privacy Officer, and Records Management Officer, will oversee the release of reusable datasets while ensuring that Personally Identifiable Information and other sensitive information remain protected. To coordinate this work, the Commission will conduct regular reviews that bring together multiple offices and bureaus to assess reuse opportunities and needs.

1.3 AI Talent Development

All Commission employees will receive baseline AI awareness training and be given role-specific instruction in AI testing, evaluation, and oversight. Senior executives will receive briefings on waiver decisions and determinations involving high-impact systems. The Commission will also rely on communities of practice such as the Small Agency CIO Council and the U.S. General Services Administration's AI Community of Practice to supplement training and provide access to shared tools.

2. Improving AI Governance

2.1 AI Governance Body

The AI Governance Board (Board), chaired by the CAIO, serves as the FMC senior leadership team that provides recommendations to the Chairman for use of AI at the Commission. Membership consists of the members of the Commission's Senior Executive Service. The Board will review and assess the agency's AI use cases, sets risk thresholds, and reviews waiver requests. The Board will meet on a regular basis. Ultimately, the Board will make recommendations to the Chairman, who will retain final decision-making authority on all AI matters, ensuring accountability at the highest level.

To support the Board, the Commission will leverage the Data Governance Committee (DGC) as the AI Working Group. The DGC will evaluate AI-related initiatives and risks and develop recommendations for consideration by the Board.

2.2 Agency AI Policies

By March 31, 2026, the Commission will align its IT, data, cyber, and privacy policies with AI-specific risks. A standalone Generative AI Policy will also be issued by March 31, 2026, to govern staff use of large language models and related AI tools. This will provide the Commission with time to incorporate the several OMB memos issued in FY 2025 and FY 2026, including M-26-04, Increasing Public Trust in Artificial Intelligence Through Unbiased AI Principles, issued December 11, 2025.

Consistent with M-25-21 §2(d) and M-25-22, the Commission will ensure that AI acquisition and contracting activities incorporate risk-management practices, including requirements for documentation, security, privacy, explainability, and termination of non-compliant systems. In alignment with M-26-04, the Commission will incorporate unbiased AI principles, including truth-seeking and ideological neutrality, into AI governance, acquisition, and oversight activities.

2.3 AI Use Case Inventory

Each office and bureau will provide regular updates to the CAIO describing any AI use. The CAIO will maintain the internal inventory and ensure that the public-facing version at fmc.gov/ai is updated within 60 calendar days of any changes. The inventory will be refreshed annually, with additional updates made following material changes to high-impact use cases.

3. Fostering Public Trust

3.1 Determinations and Waivers for High-Impact AI

Any AI system that informs regulatory, enforcement, financial, or workforce decisions is presumed to be high-impact. Waivers of one or more of the requirements for high-impact AI may only be granted where there is an urgent, mission-critical need and compensating controls are in place. The CAIO will maintain a register of all determinations and waivers, report them directly to OMB within 30 days, and publish public summaries at fmc.gov/ai, with redactions made when required. Waivers will be subject to annual re-review. The issuing, denying, revoking, and certifying of waivers will be reviewed by the DGC, followed by review by the Board, before final decision is rendered by the Chairman. The CAIO will maintain a database to track the foregoing, report them directly to OMB within 30 days, and publish public summaries at fmc.gov/ai, with redactions made when required.

3.2 Implementation of Minimum Practices and Termination of Non-Compliant AI

High-impact AI must meet the minimum risk management practices set out in M-25-21 Section 4(b). These practices include pre-deployment testing, impact assessments, continuous monitoring, human review and appeal mechanisms, public summaries, and documented termination plans. Non-compliant systems will be suspended within five business days of discovery. The CAIO will issue a termination order. The termination process involves revoking system access, ceasing operations, and ensuring that data processed by the AI system is secured, maintained, or destroyed as required.

4. Workforce and Culture

The Commission's workforce strategy emphasizes equipping staff with the knowledge, skills, and training needed to responsibly use AI. Training modules will cover AI ethics, bias mitigation, and privacy safeguards, while an internal community of practice will provide a forum to share lessons learned from pilot projects. The organizational culture will emphasize the principle of governing first and experimenting second to build public trust and staff confidence. The DGC, when serving as the AI Working Group, will play a central role in fostering awareness and promoting cross-bureau learning.

Appendix A. Milestones

FMC Issue Date	Required Action (M-25-21)	Lead Office at FMC
Mar 31, 2026	Update internal IT, data, cyber, and privacy policies	OIT with offices as appropriate
Mar 31, 2026	Submit and publish FMC AI Compliance Plan	CAIO/OIT (with DGC and Board)
Mar 31, 2026	Issue FMC Generative AI Policy	CAIO/OIT (with DGC and Board)
Apr 3, 2026	Document implementation of minimum practices for high-impact AI	CAIO with Board, DGC
Within 30 days of waiver	Report determinations/waivers to OMB; post public summaries	CAIO with Board, DGC
Quarterly	Inventory intake and review via DGC Working Group and AI Governance Board	CAIO; Program Sponsors