

Surface Transportation Board

Compliance Plan for OMB Memorandum M-25-21



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Revision History

Version Number	Date	Description	Primary Author(s)
1.0	09/30/2025	Approved	Prepared by Rachel Campbell (Managing Director), Marquis Toson (Deputy Managing Director), Usha Naik (CIO/Chief AI Officer (CAIO)), Philip Maynard (Acting CDO), Neeraj Koul (Data Scientist), Paul Hough (ISSM).

Surface Transportation Board (STB) directives are reviewed, at minimum, every three years and revisions are made as necessary to ensure that the strategy is still applicable to the STB environment and compliant with applicable federal laws, directives, policies, regulations, standards, and guidance. The revision history records dates of approval, recertification, and cancellation, as well as major and minor revisions to this directive. A brief summary of revisions will be noted. In the event this directive is cancelled, superseded, or supersedes another directive, that will also be noted in the revision history.

Approved by: _____
Managing Director

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1 DRIVING AI INNOVATION

Removing Barriers to the Responsible Use of AI

The greatest barrier to the Board's use of AI is a lack of resources. Given the Board's size (114 FTEs), the Board does not have a dedicated Chief AI Officer and team to implement AI solutions. AI capabilities are being developed as part of the Board's IT and Data efforts. Steps taken to date have been to focus on using AI capabilities available in existing toolsets and leveraging AI in those solutions. As resource availability allows, additional AI capabilities will be implemented

Sharing and Reuse

Currently the Board has not developed any AI related code and models. The Board is in the process of finalizing data architecture, maturing data governance, and developing AI governance. Currently the CDO and CAIO roles are assigned to staff as additional responsibilities. A dedicated Chief Data Officer and Chief AI Officer would be able to further promote the sharing and reuse of AI code, models and data assets.

AI Talent

The initial rollout of AI capabilities at the STB is focused on the use of AI for productivity applications. Training users and administrators of these applications is being prioritized and planned for FY26. The Board will develop a plan for training as a component of an AI roadmap in FY26. Following the development of the roadmap, an assessment of available skills and gaps will be completed.

2 IMPROVING AI GOVERNANCE

AI Governance Board

As the Board develops its internal policies for AI, it will also consider whether to establish an AI governance body.

Agency Policies

The Board is in the process of developing internal policies for AI. The Board will also review all current/draft policies for data, cybersecurity and privacy, and will update those to ensure consistency with M-25-21. The policies will include guidance for the use of generative AI.

AI Use Case Inventory

The implementation of AI capabilities was initiated at the Board in FY 2025. A catalog of approved AI solutions and a survey were developed to obtain feedback from the Offices at the Board. Each Office prioritized the solutions based on three key criteria: business value, time criticality, and risk reduction. Additionally, the Acting CDO and the case management development team have also

developed a listing of AI use cases that could support the Board's mission. Initial efforts, once fully implemented, will be focused on productivity solutions, streamlining case management processes, and the cleanup and preprocessing of documents. The Board will update the AI Use Case inventory as applicable.

3 FOSTERING PUBLIC TRUST IN FEDERAL USE OF AI

Determinations of Presumed High-Impact AI

The process to determine which AI use cases will be considered high impact will be developed once the STB finalizes its internal policies for AI. The Board has not yet developed any criteria to guide a decision to waive one or more of the minimum risk management practices for a particular use case as the Board has not yet deployed any AI. Similarly, the Board has not yet developed a process for issuing, denying, revoking, certifying and tracking waivers for one or more of the minimum risk management practices.

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

The process to implement Risk Management Practices and Termination of Non-Compliant AI cases will be included in the Board's internal policies for AI. Once established, the controls to prevent non-compliance high impact AI from being deployed to the public will be implemented.