

Commodity Futures Trading Commission Compliance Plan for OMB Memorandum M-25-21 – September 2025

Prepared by Janaka Perera, Chief AI Officer

1. Driving AI Innovation

Removing Barriers to the Responsible Use of AI

- The CFTC has not identified any appreciable barriers to CFTC's responsible use of AI. The agency will monitor for emerging barriers and will take steps to mitigate or remove them. The CFTC plans to leverage all available sources of viable AI applications, such as reputable U.S.-based technology companies specializing in AI tools, as well as the vetted sources developed by GSA for federal consumers. The CFTC has developed test plans for the thorough evaluation of AI tools.

Sharing and Reuse

- The CFTC is well poised to promote the sharing and reuse of AI code, models, and data assets due to well established communications channels within the agency. The Chief AI Officer will lead the coordination between developers and users of AI to make reusable material such as proven prompts easily accessible by all.

AI Talent

- The CFTC plans to leverage all available government wide training opportunities to train its staff on AI skills. As the use of AI and the need for expanded support grows, the agency will seek to identify the AI skill sets needed and the areas where individuals with technical talent could have the most impact. The agency plans to take appropriate actions to retrain current trained staff, and expand AI-enabling roles with a view to strategically hire new AI talent, as necessary.

2. Improving AI Governance

AI Governance Board

- The CFTC does not have an AI governance board. At this time, AI related actions will be briefed by the Chief AI Officer to agency leadership through the established reporting chains. The agency will consult with external federal and partner resources whenever appropriate and feasible to provide our staff with the best of breed AI tools.

Agency Policies

- The CFTC does not currently have internal AI principles, guidelines, or policy that are inconsistent with M-25-21. The CFTC will ensure any future policies or guidelines will adhere to M-25-21.
- The CFTC is in the process of developing internal guidance for the use of generative AI. The agency follows best practices established by the CAIO council, GSA's AI working group, and industry partners to set safeguards and oversight mechanisms that allow generative AI to be used in the agency without posing undue risk.

AI Use Case Inventory

- In FY 2025, the CFTC conducted a user survey and technology inventory to identify use cases. The agency will apply its mature change control process to identify, control and manage future infusion of AI with risk mitigation best practices.

3. Fostering Public Trust in Federal Use of AI

Determinations of Presumed High-Impact AI

- The CFTC does not currently use or have any immediate plans to use any high impact AI per the definition of such technology as defined in as defined in Section 5 of the Appendix to M-25-21.
- Any future use of high impact AI would follow the best practices and risk mitigation actions identified by CAIO council and other federal sources.