

FEDERAL FRAMEWORK ALIGNMENT MATRIX

# How the EFAIRA 30-point methodology maps to federal AI procurement frameworks.

A reference matrix showing how each of the thirty EFAIRA evaluation points maps to GAO, OMB, NIST, FedRAMP, and FAR / DFARS guidance. Designed for inclusion in agency RFI and RFP scoping, AI acquisition workforce training, and contractor proposal cross-reference.

LIBRARY REFERENCE	ISSUED	VERSION	DISTRIBUTION
<b>EFAIRA-MATRIX-V1</b>	<b>May 2026</b>	<b>1.0</b>	<b>Public Reference</b>

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## A. How to Read This Matrix

Each row in this matrix is one of the thirty EFAIRA evaluation points. Each column is a published federal framework or regulatory authority. The cell where a row and column intersect identifies the section of that framework most directly applicable to the EFAIRA point.

A dot in a cell indicates that the framework does not contain a directly mapped requirement for that point. The point may still apply through general acquisition policy or agency-specific guidance not represented in this matrix. Citations are summarized for reference and are not a substitute for the full text of the underlying framework.

**Suggested use.** An agency program office building an RFI or RFP for an AI-enabled software acquisition may use this matrix to identify the framework authorities behind specific technical evaluation requirements. A contractor preparing a proposal may use the matrix to map its compliance evidence to the federal frameworks most relevant to the source selection.

## B. The Alignment Matrix

POINT	EFAIRA EVALUATION POINT	GAO-26-107859	OMB M-25-22	OMB M-24-10	NIST AI RMF	FEDRAMP	FAR / DFARS
1.1	Model Provenance and Composition	Pg. 14-18	Sec. 5(a)	Sec. III(C)	Map 1.1, 2.1	.	.
1.2	Architecture Documentation	Pg. 22-25	.	Sec. III(B)	Map 1.2	SSP §10	.
1.3	Performance Under Federal-Scale Load	Pg. 30-33	Sec. 5(c)	.	Measure 2.5	.	.
1.4	Failure Modes and Graceful Degradation	.	Sec. 5(c)	Sec. IV(B)	Measure 2.7	.	.
1.5	Third-Party AI Dependency Disclosure	Pg. 41-44	Sec. 5(d)	Sec. III(D)	Map 3.2	Supply Chain Risk	FAR 4.23
2.1	FedRAMP Authorization Status	.	Sec. 6(a)	.	.	Authorization	.
2.2	Data Residency and Sovereignty	.	Sec. 6(b)	.	Manage 3.2	SSP §3	DFARS 252.239
2.3	Identity, Access, and Auditability	.	Sec. 6(c)	.	.	AC, AU controls	.
2.4	Vulnerability Management and Patch Cadence	.	Sec. 6(d)	.	Manage 2.4	RA, SI controls	FAR 52.204-21

POINT	EFAIRA EVALUATION POINT	GAO-26-107859	OMB M-25-22	OMB M-24-10	NIST AI RMF	FEDRAMP	FAR / DFARS
3.1	<b>Govern Function Coverage</b>	Pg. 52-55	Sec. 4(a)	Sec. II(A)	Govern 1.1-6.2	.	.
3.2	<b>Map Function Coverage</b>	Pg. 56-59	Sec. 4(b)	Sec. II(B)	Map 1.1-5.2	.	.
3.3	<b>Measure Function Coverage</b>	Pg. 60-63	Sec. 4(c)	Sec. II(C)	Measure 1.1-4.3	.	.
3.4	<b>Manage Function Coverage</b>	Pg. 64-67	Sec. 4(d)	Sec. II(D)	Manage 1.1-4.3	.	.
4.1	<b>Bias Testing Methodology</b>	Pg. 72-74	Sec. 7(a)	Sec. V(A)	Measure 2.11	.	.
4.2	<b>Disparate Impact Analysis</b>	Pg. 75-78	Sec. 7(b)	Sec. V(B)	Measure 2.11	.	.
4.3	<b>Human Oversight and Adjudication Path</b>	Pg. 79-82	Sec. 7(c)	Sec. V(C)	Govern 2.2	.	.
5.1	<b>Explainability Capability</b>	.	Sec. 8(a)	Sec. VI(A)	Measure 2.8	.	.
5.2	<b>Decision Log Capture</b>	.	Sec. 8(b)	Sec. VI(B)	Manage 2.2	AU-2, AU-12	.
5.3	<b>Model Update Disclosure</b>	.	Sec. 8(c)	Sec. VI(C)	Manage 4.1	.	.
6.1	<b>Vehicle Availability</b>	Pg. 90-92	.	.	.	.	FAR Part 8, 12, 13
6.2	<b>Socioeconomic Set-Aside Eligibility</b>	.	.	.	.	.	FAR Part 19
6.3	<b>Pricing Defensibility</b>	.	.	.	.	.	FAR Part 15.4
7.1	<b>Vendor Financial Viability</b>	.	.	.	.	.	FAR 9.104-1
7.2	<b>Customer Support Coverage</b>	.	.	.	.	.	FAR Part 39
7.3	<b>Source Code and Continuity Protections</b>	.	.	.	.	.	FAR 27.4
8.1	<b>Evidence Package Completeness</b>	Pg. 100-104	Sec. 9(a)	Sec. VII(A)	Govern 4.1	.	.
8.2	<b>Scope Boundary Documentation</b>	Pg. 105-107	.	Sec. VII(B)	Map 5.1	.	.

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8.3	Receipt Hash and Verification Path	.	.	.	.	.	.
8.4	Citation Language and Limitations	.	.	.	.	.	FAR 52.215-1

## C. Framework Reference Notes

**GAO-26-107859.** Government Accountability Office report on federal AI procurement practices, identifying gaps in cross-agency lessons-learned sharing and recommending improved assessment practices for AI software acquisition. Citations in this matrix refer to page ranges within the report.

**OMB M-25-22.** Office of Management and Budget memorandum establishing minimum risk management practices for federal use of artificial intelligence. Citations refer to section numbers within the memorandum.

**OMB M-24-10.** Office of Management and Budget memorandum on advancing governance, innovation, and risk management for agency use of artificial intelligence. Citations refer to section numbers within the memorandum.

**NIST AI RMF.** National Institute of Standards and Technology Artificial Intelligence Risk Management Framework, version 1.0, organized into Govern, Map, Measure, and Manage functions. Citations refer to function categories.

**FedRAMP.** Federal Risk and Authorization Management Program. Citations refer to specific control families within the FedRAMP control baseline applicable to the EFAIRA point.

**FAR / DFARS.** Federal Acquisition Regulation and Defense Federal Acquisition Regulation Supplement. Citations refer to specific Parts, Subparts, or clauses applicable to the EFAIRA point.

**Scope of this matrix.** This matrix is a reference summary intended to support acquisition planning and proposal preparation. It does not substitute for full review of the underlying frameworks, agency-specific supplements, or counsel review for any specific acquisition. EFAIRA scoring depends on evidence at each point, not on framework citation alone.

### ABOUT ENCORE SERVICES LLC

Encore Services LLC is a federal contracting firm focused on AI software readiness assessment for federal agencies and the contractors serving them. The EFAIRA methodology and this library are published as a public reference for the federal acquisition workforce. The methodology itself is free to reference and cite. Encore charges only for the application of the methodology to specific contractor or software assessments under defined commercial engagements.

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## **CURRENCY AND VERIFICATION**

This material reflects the federal AI policy, regulatory, and acquisition landscape as of the date shown on the cover page. Federal AI policy and guidance change continuously. New executive orders, OMB memoranda, NIST framework revisions, agency-specific implementation guidance, GAO and Inspector General reports, FedRAMP and CMMC updates, and judicial decisions can supersede or materially alter the references in this document. Before applying any cited authority to a live procurement, contractor proposal, or agency acquisition decision, verify the current text of the authority against the original publishing body and confirm that no superseding guidance has been issued. Encore updates this library on a published cadence; consult the current version at [encoresvcslc.com/methodology](https://encoresvcslc.com/methodology) before relying on any specific reference.

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