

AGENCY TRACK • QUICK REFERENCE

OMB M-25-22 Quick Reference for Acquisition Workforce

A practical one-document map of OMB Memorandum M-25-22 minimum risk management practices and where each requirement surfaces during AI proposal evaluation. Designed for desk-side use by contracting officers, AI acquisition staffs, and program managers.

LIBRARY REFERENCE	ISSUED	VERSION	DISTRIBUTION
EFAIRA-OMB-M2522-V1	May 2026	1.0	Public Reference

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A. Purpose

OMB Memorandum M-25-22 establishes minimum risk management practices for federal use of artificial intelligence. The practices apply across agency AI use, including AI capabilities acquired through procurement. This reference maps each M-25-22 requirement to a specific point in the federal AI proposal evaluation flow: pre-solicitation market research, technical proposal volume review, source selection criteria scoring, and post-award contract administration.

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B. Mapping Table

M-25-22 requirement to evaluation surface, organized by requirement area.

M-25-22 REQUIREMENT AREA	WHAT THE CONTRACTOR MUST DEMONSTRATE	WHERE IT SHOWS UP IN EVALUATION
AI use case inventory and disclosure	Contractor identifies every AI component proposed, including third-party model dependencies and inference path data flows.	Technical proposal volume, capability description section. Cross-referenced against Section L instructions and any agency-specific AI use case disclosure requirements.
Pre-deployment risk and impact assessment	Documented assessment showing identified risks, mitigations, residual risk acceptance, and the methodology by which the assessment was conducted.	Technical proposal volume. May be evaluated under technical approach, management approach, or a dedicated risk management subfactor depending on the solicitation.
Human oversight and intervention pathways	Defined human-in-the-loop or human-on-the-loop checkpoints, escalation criteria, and override authority documentation.	Technical proposal volume, operational concept section. Also surfaces in past performance when prior contracts required documented oversight regimes.
Data quality and provenance documentation	Training and inference data lineage, quality metrics, bias screening results, and update cadence procedures.	Technical proposal volume, data management section. Procurement officers should cross-check against any agency Data Strategy alignment requirements.
Performance monitoring and drift detection	Defined performance baselines, monitoring cadence, drift detection thresholds, and remediation triggers.	Technical proposal volume, sustainment section. Also surfaces in Quality Assurance Surveillance Plan and any service-level agreement attachments.

M-25-22 REQUIREMENT AREA	WHAT THE CONTRACTOR MUST DEMONSTRATE	WHERE IT SHOWS UP IN EVALUATION
Incident response and reporting	Defined AI-specific incident categories, reporting timelines, and escalation chains, including coordination with federal cybersecurity reporting obligations.	Technical proposal volume, cybersecurity and incident management sections. Cross-references CMMC and existing CISA reporting obligations.
Bias testing and disparate impact analysis	Bias screening methodology, fairness metrics applied, populations evaluated, and findings disclosure.	Technical proposal volume, ethics and risk section. May be a dedicated evaluation subfactor for higher-impact AI use cases.
Transparency artifacts	Plain-language disclosures, model card or system card materials, and recourse pathways for affected individuals.	Technical proposal volume, user experience or stakeholder engagement section.
Periodic re-assessment and decommissioning criteria	Defined re-assessment cadence, sunset criteria, and replacement planning.	Technical proposal volume, sustainment section. Surfaces in option-year evaluation and bridge contract justifications.

How to use this reference. When drafting a Section L instruction or a Section M evaluation factor for an AI-capability acquisition, work down the table left to right: pick the M-25-22 requirement that fits the agency mission risk, write the proposal instruction that elicits the demonstration in the middle column, and align the evaluation criteria language with the surface area in the right column.

C. Crosswalk Notes

Where M-25-22 connects to other federal frameworks.

- **NIST AI RMF Govern function.** Risk management practices documented under M-25-22 satisfy multiple Govern-category control objectives. Contractors who have implemented the NIST AI RMF can often cite existing artifacts to demonstrate M-25-22 compliance.
- **FedRAMP.** M-25-22 sits alongside FedRAMP for AI services that process federal data. FedRAMP authorization addresses information security control posture; M-25-22 addresses AI-specific risk management on top of that posture.
- **FAR / DFARS supply chain provisions.** M-25-22 data provenance requirements interact with FAR supply chain risk management clauses and DFARS supply chain illumination obligations.
- **Section 508.** Transparency artifacts required under M-25-22 must also meet Section 508 accessibility standards for affected federal users.

Working reference. This document is a working reference. It is not legal advice, formal agency guidance, or an authoritative interpretation of OMB Memorandum M-25-22. Always consult agency counsel and the original memorandum text when applying these mappings to a live procurement.

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