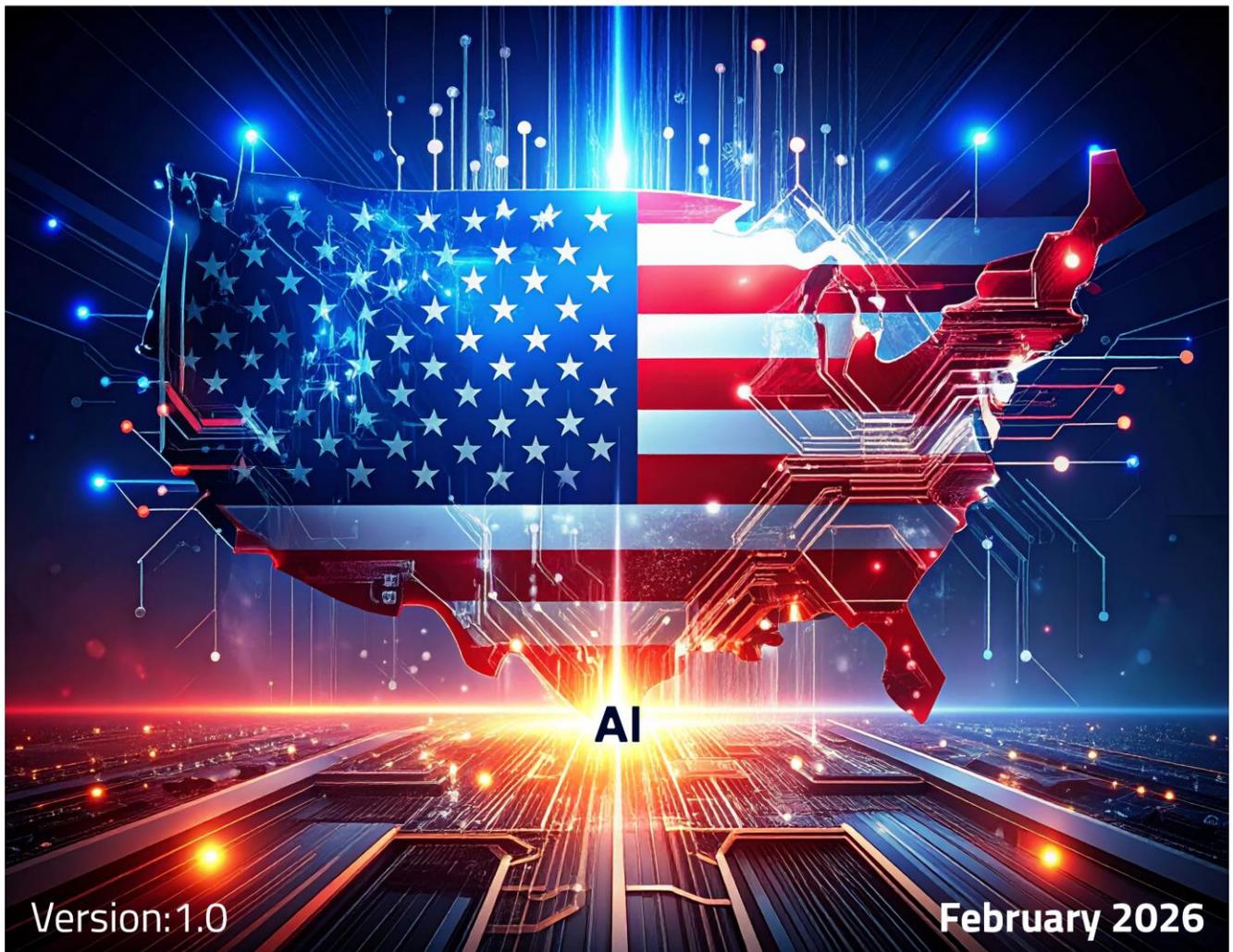




EXIM AI Strategy *for* OMB Memorandum M-25-21

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PURPOSE

The Artificial Intelligence (AI) in Government Act of 2020¹ and OMB Memorandum M-25-21², *Accelerating Federal Use of AI through Innovation, Governance and Public Trust*, directs each CFO Act agency to submit to the Office of Management and Budget (OMB) and post publicly on its website an agency strategy for removing barriers to the use of AI and advancing agency AI maturity.

While EXIM is not a CFO Act Agency, AI is critical to its capabilities as it moves forward with its broader Agency and technology strategy. EXIM is pleased to share the role of AI at EXIM and EXIM's strategy regarding this transformative technology.

AUTHORITY

The establishment of an AI strategy within EXIM is primarily guided by best practice, mandates from OMB, Presidential Directives, and other federal regulations. OMB mandates, such as the Federal Data Strategy, the Cloud Smart Strategy, and *Accelerating Federal Use of AI through Innovation, Governance and Public Trust*, provide a framework for leveraging data as a strategic asset and adopting modern technology practices, including AI. In addition, M-25-21 requires CFO Act agencies to prepare and publish their strategic approach to AI. These authorities collectively empower federal agencies to develop and implement AI Strategies and resultant policies that align with national priorities, promote innovation, and maintain the public trust in the use of AI technologies.

SCOPE

This strategy covers EXIM's entire operations and technology portfolio³.

AI is a machine-based system that can make predictions, recommendations, or decisions influencing real or virtual environments for a given set of human-defined objectives. AI systems use machine and human-based inputs to perceive environments, abstract perceptions into models through automated analysis, and utilize model inference to formulate options for information or action. The definition includes systems using machine learning, large language models, natural language processing, computer vision technologies, and generative AI. It excludes basic calculations, basic automation, or pre-recorded "if this, then that" response systems.

¹ [H.R.2575 - 116th Congress \(2019-2020\): AI in Government Act of 2020 | Congress.gov | Library of Congress](#)

² [M-25-21-Accelerating-Federal-Use-of-AI-through-Innovation-Governance-and-Public-Trust.pdf](#)

³ The scope of this strategy is the internal use of AI at EXIM and does not include the program role of EXIM in the context of the American AI Action plan or other EXIM financing initiatives.

This Strategy guides all new and existing AI systems developed, used, or procured by EXIM, which could directly impact the mission or security of EXIM.

CONTEXT RELEVANT TO EXIM'S AI STRATEGY

EXIM's AI Strategy, as well as its broader IT strategy, exists in the context of its unique mission and characteristics that shape what problems are important to EXIM in pursuing its goals and what opportunities and constraints EXIM considers as it works to take advantage of AI. The purpose of this section is to give readers a high-level overview of important contexts that shape how EXIM approaches its AI strategy.

About EXIM

The Export-Import Bank of the United States traces its origins to 1934, when President Franklin D. Roosevelt established the agency by Executive Order to aid in financing and facilitate exports and imports during the Great Depression. Roosevelt envisioned EXIM as a tool to support U.S. employment and strengthen international trade relationships, ensuring American businesses could access the same financial facilities available to foreign competitors. In its early years, EXIM supported landmark projects such as the Burma Road, the Pan American Highway and post-World War II reconstruction in Europe, Asia and Africa, reflecting its foundational purpose of promoting economic stability and global engagement through trade.

Today, EXIM operates as an independent, self-sustaining federal agency under the Export-Import Bank Act of 1945 and provides financing solutions including loan guarantees, direct loans, working capital guarantees, and export credit insurance. Backed by the full faith and credit of the United States, EXIM assumes credit and country risks that the private sector is unable or unwilling to accept as well as leveling the playing field for U.S. exporters facing foreign government-backed competition. Guided by statutory mandates, EXIM prioritizes small businesses and sectors critical to national security and economic resilience, while advancing U.S. economic competitiveness, strengthening domestic supply chains, and promoting job creation across all 50 states.

What does EXIM do?

EXIM is a commercial finance entity focusing on providing finance and risk management solutions. The agency, though a federal entity, operates in a commercial context with revenue from fees and interest on underwritten risk, risk-related losses, and general administrative expenses leading to a bottom-line profit and loss for the US Taxpayers. No entity is required to do business with EXIM. It is not a regulatory entity. Parties do not transact with EXIM unless they see value in the services EXIM offers for the fees charged.

Unlike other government agencies, EXIM's Charter requires the agency to actively pursue transactions that generate returns from fees, interest, and other sources to the best of its

ability. To achieve self-financing status, EXIM must offset administrative and program funds appropriated by Congress with revenues generated from its transactions. Achieving self-financing status is essential to maintaining public trust and demonstrating that EXIM delivers measurable results for American workers while protecting taxpayer resources. EXIM, over its life, has returned more than 9 billion dollars to the US Treasury. EXIM is a business serving entity; it does not transact with individuals in their personal capacity.

The Bank's most common products can be broken down broadly into short-term/small 'commoditized' transactions and larger, tailored products.

The small/short-term commoditized trade insurance product is typically focused on small- and medium-sized businesses and allows them to insure their foreign export shipments with EXIM for a risk-based fee, relieving them of foreign counterparty credit risk. This 'high-volume' activity for EXIM has approximately 1,600 transactions per year on average for the last five years. The preponderance of these transactions are in the hundreds of thousands to millions of dollars in size.

The longer-term, large, structured side of EXIM's business focuses on tailored loans and guarantees related to more complex transactions. These transactions are often years in the making, and, from a size perspective, are typically in the hundreds of millions and occasionally in the billion-dollar range.

While the general structure of products is as described above, EXIM more recently has been involved in domestic finance transactions and transactions specifically focused on leveling the playing field and bringing supply chains back to the United States. These transactions tend to be large and complex similar to the long-term transactions above but not necessarily involving traditional exports.

Most recently, EXIM was named in the administration's AI Action Plan of July 2025 as one of the key agencies in the Executive Branch to support the export of the American AI stack.

EXIM size, structure, budget:

EXIM is an independent agency. The agency's staff numbers approximately 350 federal team members and 150 contract staff based mainly in Washington DC.

From an organizational perspective, EXIM has two specialized customer-facing divisions: The Office of Small Business – which focuses on the short-term credit insurance product utilized by the preponderance of the agency's small and medium sized enterprise customers and the Office of Board Authorized Finance – which focuses on the larger, structured loans and guarantees utilized by the agency's largest customers. EXIM also has a specialized business

development function – which focuses on bringing transactions into the bank and is highly integrated into the banking function and a specialized risk function – the Office of the Chief Risk Officer – which is unique to the mission and focused on various risk and economic analysis.

Outside of these mission specialized groups, EXIM has administrative functions tailored to support EXIM including groups like the front-office, general counsel, finance, IT, human capital, and other foundational capabilities. Approximately 50% of the EXIM headcount is associated with these mission-unique divisions, and the remaining 50% and most contract staff operate in the tailored corporate/administrative functions enabling product teams and processing.

EXIM's budgetary resources are approximately 140 million dollars. Payroll is the largest agency expense at approximately 75 million dollars. After payroll, the largest expense group at the agency is information technology with annual IT operations and investments trending from approximately 35 to 40 million dollars per annum.

What do our people do? How do they spend their time?

In addition to the corporate processes, our mission teams operate within a high-level process framework of originating, underwriting, asset management, and servicing/reporting activities. Given the low volume and customized nature of a substantial part of the work at EXIM, most staff spend the preponderance of their time in the agency's general office automation environment (e-mail, Word, Excel, PowerPoint, collaboration, document storage etc.) and after that, in specialized applications for their function (e.g., originations, finance/insurance application processing, servicing, accounting, payroll administration, data warehouse, etc.). General office automation supports collaboration, communications, reading and writing, research and discovery and creative processes such as deal-structuring and strategy work as well as content-development oriented activities (memo's, presentations, reports, etc.).

Enterprise IT, stack, security and size

EXIM IT is organized into four broad portfolios: 1) mission systems, 2) personal productivity systems, 3) corporate systems, and 4) underlying infrastructure. Other than specialized mission systems where the agency maintains custom-built application systems, the other systems are generally state-of-the-market commercial offerings, the preponderance of which are SaaS offerings. Almost all agency systems are now in commercial cloud environments.

EXIM, from a security perspective, operates in the moderate security space. It maintains no high systems. Most of the data that needs to be protected is focused on various forms of confidential unclassified information (CUI) relating to customer information, personnel information and routine confidential administrative activities performed by counsel.

The total corpus of EXIM technology and data occupies less than one petabyte of storage. While the agency has relatively few custom applications, they consume almost 40% of the agency IT budget. The federal IT staff is approximately 30 team members, and contract IT staff range from 70 to 120, depending on the amount of new development work being done.

What are EXIM's opportunities relevant to AI?

- High dependence on people – EXIM's fundamental engine of productivity and revenue generation is its professional staff. Unlike retail (a.k.a. consumer finance) where customers often interact exclusively with a technology platform, in most EXIMs business, the customer works with a banker to structure or select and apply for the offerings at the Bank. Given that AI is fundamentally focused on solving problems that here-to-fore were considered only solvable by people, EXIM has significant opportunities with this new technology that were not feasible before the new AI capabilities.
- Ability to inherit AI capabilities in our commercial portfolio – EXIM's broad adoption of state-of-the-market commercial capabilities means EXIM can inherit significant AI use cases and capabilities being rapidly developed and implemented by its commercial providers. EXIM, without making explicit investments in AI, is already inheriting significant AI capabilities and AI-driven use cases and outcomes through its commercial software partners.
- EXIM can move fast – EXIM's teams are nimble and can drive decisions and behaviors without the inertia of a larger, more complex organization.

AGENCY STRATEGIC PLAN

EXIM's strategic plan for FY26 thru FY30 builds on and continues a consistent path of supporting American jobs, fueling American energy dominance, fortifying supply chain security, financing the industries of the future and winning through excellence. AI technology, over the course of the next strategy cycle, is expected to be a significant ingredient in the processes and programs for the technology enablement in each of these objectives. An outline of the agency's strategic plan and the outcomes associated with each part of the plan is provided below. EXIM's AI strategy is in support of the Agency Strategic Plan.

Strategic Goal 1: Support American Jobs

Return EXIM to its founding mission of putting American made equipment, technology, molecules, and services first—all to create and support American jobs.

- *Return EXIM to its founding mission by increasing financing capacity to empower U.S. businesses to compete globally and drive job creation at home.*
- *Expand both first-time and repeat small business participation by improving access to EXIM solutions and fostering long-term relationships.*

- *Enhance external-facing systems to deliver a seamless customer experience and improve service delivery.*
- *Lead America's export strategy by positioning EXIM as a trusted leader and key partner in advancing national priorities.*

Strategic Goal 2: Fuel American Energy Dominance

Unleash an era of energy dominance where U.S. energy molecules and technologies reach every corner of the globe.

- *Foster global stability and prosperity by making American energy accessible to the countries in need, while creating jobs and reinforcing U.S. industry at home.*
- *Support the export and financing of energy infrastructure, including pipelines, power generation equipment, and advanced technologies, using American-made products and expertise.*

Strategic Goal 3: Fortify Supply Chain Security

Fortify our vital supply chains so Americans and our allies can depend on them for what they need when they need it most.

- *Advance U.S. economic security by strengthening supply chain security and ensuring that Americans and companies both large and small have reliable access to the goods essential to our economy and national strength.*
- *Leverage our full set of authorities, including SCRI and MMIA, to support American businesses, strengthen manufacturing capacity, and revitalize critical infrastructure.*

Strategic Goal 4: Finance the Industries of the Future

Unlock capital flows to finance the industries of the future from artificial intelligence to advanced mobility.

- *Advance U.S. innovation and technological standards in artificial intelligence by supporting the export of U.S.-developed AI infrastructure, hardware, and software.*
- *Promote American leadership in frontier technologies through direct exports and transactions in ten Transformational Export Areas.*

Strategic Goal 5: Win through Excellence

Drive operational excellence across EXIM by embedding best-in-class practices, disciplined stewardship, and a high-performing workforce at every level of the agency.

- *Foster a culture of excellence by attracting, developing, and retaining top talent through strategic hiring, collaboration, and professional development.*
- *Advance stakeholder understanding of EXIM reauthorization and opportunities that prioritize U.S. strategic interests.*
- *Implement AI-enabled systems and tools to enhance data management and operational efficiency.*

- *Ensure EXIM programs are fiscally responsible, performance-driven, and transparent to the public and Congress.*
- *Achieve self-financing status by generating sufficient revenue to cover operating costs, reinforcing EXIM's role as a budget-neutral federal asset.*

IT Strategic Plan and Its Intersection with AI.

In addition to the agency's strategic plan, EXIM also maintains an IT strategy to support the agency's strategic plan. This AI strategy details elements of our IT Plan relevant to AI. EXIM's overall IT strategic planks that are most relevant to EXIM's AI strategy include:

- Tie IT Investments to business outcomes – AI is not an outcome, and while we have a focus on exploring and leveraging this transformative technology, it's because of the impact it can have on business outcomes that AI is relevant to EXIM. All EXIM AI initiatives need to be tied to relevant use cases and outcomes that align with our strategic plan.
- Leverage Commercial Product/Platforms -- Given the size and focus required to keep up with the rapid rate of development in the AI space, EXIM will leverage the size, specialization and investment capacity its key commercial providers to keep it moving at the speed of AI.
- Focus on Adoption and Utilization – not construction. Given its mission, size and budget capacity, EXIM will focus its resources on learning to use and adopt AI and not towards 'developing' AI. As an example, based on current technology, EXIM will focus on curation of data to become accessible through RAG or RAG-like technologies for commercially trained models. EXIM does not expect to engage in training AI.
- Make all Agency Data/Information AI Addressable – All EXIM data, will by default, be enabled in or have a strategy to move that data to AI addressable platforms to be able to take advantage of AI capabilities. For EXIM, this location, to meet AI capabilities where they are, is in commercial cloud environments. This means that EXIM's systems and Data should be in the cloud.
- Reengineer/reimagine processes, don't just automate – when looking at AI use cases, EXIM will continue to focus on process re-engineering to simplify and take out unnecessary activities and frictions. Even if AI can help us reduce the cost of friction, eliminating friction from the start is the preferred path.
- Use agile methods - Bunts and singles vs swinging for the fence -- Our approach to AI will be agile and focus on minimum viable product/process concepts. If we have a ten-step process and one out of the ten steps can easily be improved by AI, we will take one step. We will avoid the trap of letting perfection become the enemy of the good.

- Ensure Data Quality – for many advanced capabilities, clean and well curated data is critical to AI success. EXIM will continue its data clean-up activities as foundational to AI success.
- Learning Mindset -- Our staff and leadership will commit to an appropriate level of understanding of AI relative to their position and responsibilities. All staff have a commitment to becoming AI literate and skilled relative to their position.
- Strong Governance – while a transformative technology, AI is a form of IT and will be managed as a part of the IT portfolio under the auspices of the office of the Chief Information Officer and subject to laws, regulations, controls and safeguards promulgated for federal and Agency technology plus relevant new regulations and best practices that address the unique risks involved in AI.

EXIM’s AI STRATEGIC VISION

EXIM envisions a future where Artificial Intelligence (AI) becomes a natural extension of all bank processes while maintaining the highest standards of safety, accountability, and public trust. This vision aligns with Executive Order (EO) 14179, “Removing Barriers to American Leadership in Artificial Intelligence and Office of Management and Budget Memorandum M-25-21 “Accelerating Federal Use of AI through Innovation, Governance, and Public Trust,” among other applicable authorities governing AI use in the federal government. Together, these directives guide federal agencies to adopt AI responsibly by removing unnecessary barriers to innovation, ensuring appropriate safeguards, and leading with transparency.

EXIM is focusing on AI as part of its broader technology portfolio because the rapid rate of technological change in AI is reshaping what customers, staff and our stakeholders expect from a modern entity in all aspects of its operations.

By harnessing the power of AI, EXIM will enhance the execution of its goals to Support American Jobs, Fuel American Energy Dominance, Fortify Supply Chain Security, Finance the Industries of the Future, and Win Through Excellence.

AI will be integrated into EXIM operations to generate insights, automate business processes and operations, and improve decision-making. This will allow us to use our agency experience, customer-provided information, and market data more effectively in service to our mission. EXIM will direct resources to areas with the highest mission benefit and support our workforce with tools that increase effectiveness and efficiency.

AI STRATEGIC GOALS

To achieve EXIM’s vision, we will pursue three enterprise-wide goals that guide all arms of EXIM in adopting Artificial Intelligence.

1) Transform Mission Operations

Strategic Goal: Integrate AI into mission delivery to improve decision-making, increase efficiency, and support both enterprise and frontline operations. EXIM will apply AI across its operations to Support American Jobs, Fuel American Energy Dominance, Fortify Supply Chain Security, Finance the Industries of the Future, and Win Through Excellence. Harnessing AI for EXIM's operations will enable faster, data-driven decision-making, reduce toil, and streamline workflows. This transformation extends across our Originations, Underwriting, Asset Management and Servicing processes as well as our personal productivity and corporate/administrative portfolios.

2) Internally Invest in AI Capabilities

Strategic Goal: Acquire trustworthy, and transparent AI capabilities that deliver measurable value to the mission. EXIM will internally invest either directly and/or indirectly in AI capabilities that are secure and transparent. Every internal investment will be assessed against mission outcomes. Systems will be designed to protect data and privacy while maintaining accountability in how AI is applied. These safeguards will strengthen trust with employees, customers, and other agency stakeholders

3) Cultivate and Develop the Workforce

Strategic Goal: Establish an AI-ready workforce through training, collaboration, and continuous learning so employees at every level can use AI responsibly to advance the mission. EXIM will provide appropriate training and professional development opportunities to ensure staff at every level can use AI responsibly and effectively. Training will address topics such as AI capabilities and limitations, identifying potential adverse impacts within results, legal requirements, and the critical importance of human oversight in AI-assisted or influenced decision-making. To ensure employees keep pace with AI technologies as they develop, continuous learning and training will be critical, with particular attention given to emerging AI capabilities, evolving risks, changing regulatory requirements, and best practices learned from AI implementation across the federal government.

USE CASES

EXIM is already applying Artificial Intelligence to improve mission delivery, increase efficiency, and improve service to customers and stakeholders. These applications support Administration priorities and demonstrate EXIM's commitment to responsible innovation. EXIM will maintain an annual inventory of AI use cases, consistent with OMB Memorandum M-25-21. This inventory will be published at www.exim.gov/ai to provide transparency and accountability. Each published use case will document how AI is used, its mission impact, and the safeguards in place to ensure compliance with law, policy, and other standards. An overview of EXIM use cases based on current activities and explorations is provided below:

- General Personal Productivity – as mentioned in our strategic overview, the preponderance of staff spends significant time in our general personal productivity tools that are rapidly being transformed by new AI capabilities that focus precisely on the types of use cases that are prevalent at the bank. Even before the agency deployed tools, the agency took a permissive policy to general AI tools on the internet for non-sensitive use cases and staff were using these tools for discovery, summarization, analysis, copy development, editing assistance, inquiry, note taking, un-official translations and other useful and time-saving use cases.

In 2025, EXIM enabled its first internal AI Assistants for all staff through AI extensions from our platform office automation provider. Further in 2025, approximately 20% of the staff were enabled with advanced personal productivity AI operating in the context of each office automation tool which now allowed for the processing of internal and sensitive documents through this productivity enhancing technology. At the beginning of FY 2026, advanced AI general personal productivity tools were deployed as the ‘baseline’ personal productivity suite for every staff member at the bank.

- Expert Productivity -- expert productivity, to distinguish from general productivity, are tools sanctioned for use within a particular complex functional domain. We see particular opportunities in the case of legal research and other specialized domains such as credit analysis, contracting/procurement, marketing and communications as well as HR activities where productivity gains are dependent on verified, curation of the data and prompt response quality. In many cases, our existing curated research vendors are supplying these AI overlays to improve the usability of their tools and handling, through their own advanced AI investments, the expensive and challenging controls that needs to be brought to bear on these expert domains.
- Business Process/Agentic AI – agentic AI refers to AI systems that don’t just respond to instructions — but can take initiative, set sub-goals, and act autonomously to accomplish tasks. Agentic AI begins to demonstrate one or more of the following features, instead of waiting for a prompt:
 - Plan
 - Make decisions
 - Take actions in a sequence
 - Adapt to feedback
 - Pursue objectives over time

EXIM’s current tool sets support basic agentic AI capabilities within specific platform domains and are currently focused on the personal productivity technology capabilities. This capability allows EXIM to string together steps into more useful and formalized business process tasks/steps. EXIM expects to begin pilots of more complex cross-platform agentic capabilities later in 2026

- Customer Experience – the latest development of AI is particularly useful in the human/machine interface by handling natural language (voice, text) interactions with machines. We see broad opportunities to enhance our customers (and staff) facing applications with AI-enabled features to smooth the customer experience and take toil out of interacting with EXIM. In some cases, the private sector is already solving some of these customer experience use cases at no explicit cost to EXIM. For example, by orienting our public website to be consumable by commercial AI, we have seen customers are able to learn about EXIM’s products and services with a natural human interaction with public chatbots without EXIM having to spend funds on a proprietary solution. We see some potential for enhancing customer experience with non-public information interactions with stakeholders, but this exploration, so far, is emergent and heavily dependent on cost relative to the small interaction base we have in this area.
- Automated Underwriting - underwriting, from a mission perspective, is the most important decision that the bank makes on a routine basis and a high-impact use case. The bank currently employs statistical techniques to auto-underwrite, and these techniques are fundamentally deterministic and not self-learning. Advances in AI in this space are being watched carefully for potential opportunities to improve this key process. Given the nature of underwriting decisions, this high-impact use case will require significant testing and controls to be applied. It should be noted that while the underwriting decision itself is high-impact, if underwriting is decomposed into all of its steps, there are a number of low-risk elements that align with the personal productivity and expert productivity space that can be substantially improved and sped up with AI.
- Software Development – while EXIM does not spend significant money for software development in absolute dollars, within the IT budget, custom software development and support for our mission applications consume almost 40% of the IT budget. We see substantial opportunities in the application of AI in the software development process that will allow us to speed up application development and/or reduce the costs per unit of development activity. In 2026, we expect that as part of any software development solicitation we will be focusing on vendor responses to how they will be using AI to enhance their development efficiency.
- The Emergent Customer Interface – like single sign on, which simplified logging into the various application at an agency, AI as the interface, while related to customer experience, is also something that needs to be technically planned for both internally and externally. Users, through natural language interaction and embedded credentials, will seamlessly transit applications without needing to navigate within dissimilar or clunky interfaces. Those legacy interfaces will be addressed by a user’s agent and delivered to the user in a consistent digestible manner. EXIM is already seeing this trend within software suites such as Microsoft where Copilot can be used as the front end to move between Word,

PowerPoint, Excel and e-mail without going to each of those applications independently. Similarly, within the smartphone ecosystem, we are seeing similar advancements rapidly taking the toil out of interacting with the suite of capabilities available on the device.

- Other specialized use cases – as EXIM is a significant user of enterprise platform and SAAS products, we have seen a rapid introduction of AI into our key platforms oriented around important functions and use cases at the bank. In 2024 and 2025 we saw rapid AI-fueled innovations coming at us from HR Systems, Sales and Marketing tools, cyber security (which has been our most mature user of AI capabilities in their tooling) as well as in the Marketing and Communications space. We expect this trend to continue in 2026 and 2027.

AI MATURITY GOALS

EXIM is building the foundation for enterprise-wide use of Artificial Intelligence. The objective is to mature capabilities that support EXIM’s goal to transform mission operations. EXIM’s AI Strategy directly contributes to and is integrated with the FY 2026–2030 Strategic Plan.

Where we are today:

- AI is in use across EXIM, with in-production capabilities through our platform providers in the areas of personal productivity and specialized marketing and CRM software, and cyber-security.
- Early applications are showing great promise in taking toil out of many work processes performed by EXIM staff, making staff more efficient and producing faster turnarounds on work products, but utilization is not uniform across EXIM.
- Initial workforce training has begun with a focus on personal productivity, simple agentic capabilities, and emerging communities of practice are forming, but more opportunities are being planned.

Where are we going:

- Infrastructure: To effectively support AI development and deployment, EXIM will adopt an infrastructure strategy that leverages secure, FedRAMP-authorized commercial services that will enable responsible, scalable adoption of AI and allow EXIM to capitalize on market driven innovations.
- Data: EXIM will implement data governance practices within all systems to ensure data quality and make EXIM data AI accessible. In addition, EXIM will focus its data infrastructure to ensure data used in conjunction with AI capabilities is traceable, shareable, and reusable; and maintain appropriate privacy protections consistent with applicable law. A modernized data architecture that will manage structured and unstructured data will enable faster innovation.
- Agentic: EXIM will explore and implement, as appropriate, more complex agentic capabilities that move beyond the simple capabilities that are limited to single platforms. While EXIM minimizes the number of platforms, our most complex processes do cut across multiple systems, and Agentic AI is an important element of EXIM’s future.

- **Culture:** EXIM will focus on agency culture as a critical component in driving AI maturity. Culture involves tone-at-the-top, the willingness for responsible risk taking, and other key factors cited by industry to facilitate the ability to thrive in a rapidly changing environment.
- **Workforce:** Training will be tailored to roles and skill levels. AI champions will be identified across offices.
- **Research and Partnerships:** EXIM will participate in AI research and development through partnerships with industry, academia, and other agencies to accelerate learning and expand mission impact in alignment with its strategy. Due to its size and mission, EXIM's research will likely be focused on utilization-oriented practices vs fundamental AI, development-oriented research.
- **Governance and Risk Management:** Oversight will align with minimum risk-management practices required by OMB M-25-21, and will be informed by best-practice frameworks such as the National Institute of Standards and Technology (NIST) AI Risk Management Framework 1.0 (NIST AI 100-1) and NIST Generative AI Profile (NIST AI 600-1), embedding transparency, accountability, and safety into every stage of development and deployment. By linking AI maturity directly to the FY 2026–2030 Strategic Plan, EXIM will demonstrate how AI enhances operational efficiency and strengthens mission outcomes.

AI-ENABLING INFRASTRUCTURE

EXIM is laying the foundation for a robust AI infrastructure that supports the full lifecycle of AI—from development and testing to deployment and continuous monitoring. This infrastructure will provide flexible platforms, secure data environments, and automated monitoring systems that evolve alongside emerging technologies. While EXIM's AI-enabling infrastructure is evolving - key tenants of EXIM's AI infrastructure are:

- *Evolve our infrastructure so that data is physically, easily addressable by commercial AI capabilities*
- *Data, while it may congregate on commercial platforms, must be pushed to platforms that are 'open' and not proprietary*
- *User interfaces of applications must support emergent AI access*

Development and Testing - EXIM is investing in AI platforms that provide developers with specialized resources for rapid prototyping and development. As required, Pre-deployment testing protocols, including validation, benchmarking, and risk assessments, will confirm that AI tools are accurate, reliable, and ready for mission use.

Deployment - AI tools will be deployed through agile, centralized platforms that maximize reuse and reduce duplication. EXIM will work towards rapid implementation of new and specialized models while keeping internal and sensitive information secure and not be used for commercial model training purposes. Shared platforms will manage access to internet-connected models and live data sources, ensuring that systems remain current, cost-effective, and aligned with mission requirements.

Continuous Monitoring - Trust in AI requires continuous oversight. EXIM will deploy automated tools to track model performance, and other important metrics. Monitoring will be paired with human review, periodic re-validation, and impact assessments to ensure transparency, accountability, and mission alignment. Cybersecurity protection and audit logging will provide an additional layer of safeguards. These measures will ensure AI systems remain accurate, reliable, and secure throughout their lifecycle, providing high-quality inputs into EXIM workstreams.

DATA

Trustworthy AI depends on trustworthy data. EXIM will ensure that every AI system is built on accurate, consistent, and secure data. This commitment spans the full data lifecycle—from acquisition and governance to sharing, explainability, archiving, and responsible deletion. By strengthening its data governance, EXIM reinforces the quality of data-informed decisions and safeguards public trust.

Ensuring Access to Quality Data and Traceability. EXIM will strengthen enterprise data governance to ensure accuracy, consistency, and security. Data Stewards will manage data portfolios, enforce quality standards, and apply FAIR (Findable, Accessible, Interoperable, Reusable) principles. Enterprise-wide standards and metadata practices will support consistency across structured and unstructured sources, ensuring AI output remains transparent, traceable, and defensible.

Promoting Data and AI Asset Sharing. Modernized data architecture, including shared data platforms, will enable data sharing and reuse across EXIM. Shared resources— such as catalogs, code repositories, and data-sharing agreements will be developed with standards that align with this strategy. This approach will reduce duplication, accelerate innovation, and comply with federal records management requirements.

Advancing Explainability and Traceability in AI. AI systems used or developed for the agency will be required to have strong features to support traceability and interpretability. Documentation will capture data inputs, decision processes, and outputs. Regular reviews, AI impact assessments, and independent evaluations will ensure decisions are explainable, comport with relevant laws, and are understandable to employees, stakeholders, and the public.

AI READY WORKFORCE

EXIM's AI strategy depends on a workforce equipped with the skills and confidence to use AI responsibly. Every employee will have access to training, tools, and support at the level needed for their role.

Tiered Training and AI Literacy. Training will be delivered through a tiered model. All staff will have access to foundational instruction on how to use AI responsibly. Employees in technical roles will have access to advanced training in data science, machine learning, and AI legal and regulatory matters. Training will be integrated into professional development programs and supported by digital learning platforms.

AI Champions and Communities of Practice. EXIM will build a network of AI champions across offices to connect technical expertise with mission needs. Champions will identify use cases, share lessons learned, and promote responsible adoption. Internal communities of practice will enable collaboration and knowledge sharing across bureaus.

Career Growth and Recruitment. EXIM will recognize employee contributions to AI initiatives and expand career pathways for staff to build expertise. Recruitment or new responsibilities for existing positions, as appropriate, will target skills in data science, machine learning, systems engineering, laws and regulations, aligned with evolving mission requirements.

Culture of Responsibility and Trust. EXIM is investing in its people by ensuring every employee has the tools, training, and support to use AI confidently and responsibly. These programs will build the skills needed to identify AI opportunities, manage risks appropriately without creating unnecessary barriers, and integrate AI into mission delivery for better, faster, and more informed decisions. Building this culture of responsibility will ensure AI strengthens decision-making while reinforcing the EXIM's mission.

RESEARCH AND DEVELOPMENT

EXIM does not currently conduct primary AI R&D, nor does it have AI R&D Funding. As mentioned in our strategy section above, EXIM's focus and relationship with AI Developers are primarily focused on utilization insights vs construction insights.

EXIM supports a forward-looking collaboration and experimentation to ensure AI solutions are effective, trustworthy, and meet mission needs. These efforts are grounded in EXIM's goals: to Support American Jobs, Fuel American Energy Dominance, Fortify Supply Chain Security, Finance the Industries of the Future, and Win Through Excellence.

Partnerships and External Expertise. EXIM will participate in partnerships with academia, industry, and federal agencies as appropriate. These collaborations will bring specialized expertise, co-develop mission focused solutions, and align EXIM innovation with EXIM priorities.

Accelerating Learning. Across EXIM, lessons from R&D will not remain in pilots. Prototypes, trials, and partnerships will be captured, documented, and shared across EXIM to prevent duplication, shorten deployment timelines, and ensure enterprise-wide benefit.

AI GOVERNANCE AND RISK MANAGEMENT

AI represents both a technological and organizational shift. To manage this change, EXIM has and will continue to update and evolve governance across leadership, operations, and policy. The major elements of EXIM's AI Governance and Risk management include:

Centralized Leadership and Oversight - EXIM has established an AI Governance Board chaired by the Senior Vice President and Chief Information Officer who also serves as the agency Chief AI Officer (CAIO). The agency CISO serves as the Deputy CAIO. This Governance board includes senior representatives from the Front Office, Banking, Risk, Policy, Finance, Cyber Security, Procurement, Data, Human Capital, General Counsel, and others, as appropriate. The Board will set policy direction, provide input on investment priorities, and ensure accountability across the enterprise.

The CAIO will ensure AI use aligns with legal requirements and government-wide guidance, providing strategic counsel and participating in executive decision-making, including coordination with the Chief AI Officer Council. Externally, the CAIO will represent the EXIM in AI related bodies, standards of organizations, and international forums, promoting alignment of AI efforts across the federal government.

Operational Coordination - A centralized AI Program within the Office of the Chief Information Officer will serve as the technical and strategic hub. This Program will coordinate training, communications, application development, and compliance with federal mandates, while advising the Governance Board on emerging risks and opportunities.

Enterprise Risk Management for AI - EXIM will embed risk management into every stage of the AI lifecycle, aligned with the NIST AI Risk Management Framework and OMB M-25-21.

Governance, Operations, and Internal Coordination. EXIM will leverage its Office of the CIO and its existing policy and process capabilities for strategy and administrative coordination of AI activities. This will strengthen enterprise readiness by embedding risk management, operational safeguards, and internal coordination across the AI lifecycle into well-established processes with minimal additional friction to the program. AI Safety Board activities will be addressed through updates to existing policies to coordinate enterprise risk, cybersecurity, and privacy as AI is added to the portfolio. Coordination across data governance, IT, and cybersecurity functions will enforce lawful and secure integration of AI.

RESOURCE TRACKING AND PLANNING

EXIM will align AI investments with agency priorities and mission outcomes. Decisions will be data-driven, cost-conscious, and guided by shared enterprise needs.

Agile and Compliant Procurement processes will align with federal guidance, including OMB Memorandum M-25-22. The Department will prioritize open-source and American-made solutions, pursue cooperative agreements, and leverage other funding mechanisms.

Specific policies and training programs will strengthen staff awareness, promote responsible use, and ensure risks are managed effectively. Workforce readiness will be embedded into governance.

THE PATH FORWARD

Through this strategy, EXIM is laying out the path to accelerating the potential of enterprise-wide use of AI. By combining innovation with accountability, AI will strengthen decision-making, empower the workforce, and enhance mission delivery in every EXIM operation. This strategy ensures that EXIM not only keeps pace with change but delivers lasting value to its mission.

APPENDIX A: TERMS AND DEFINITIONS

Artificial Intelligence (AI) is a machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations, or decisions influencing real or virtual environments. AI systems use machine and human-based inputs to perceive real and virtual environments, abstract such perceptions into models through analysis, and use model inference to formulate options for information or action.

Chief AI Officer (CAIO): A senior executive responsible for overseeing the agency's development and implementation of AI strategies, policies, and governance. The CAIO ensures compliance with standards and regulatory requirements and coordinates AI initiatives across the organization.

Chief AI Officer Council (CAIOC): An interagency group led by OMB and comprised of Agency CAIOs to support the roll-out of M-25-21 and share best practices for the implementation of AI strategies, policies, and governance. The CAIOC also assists in coordinating AI initiatives across the Federal Government.

AI Governance is the framework, processes, and policies implemented to ensure the ethical, legal, and responsible use of AI within an organization. It includes establishing governance bodies, principles, and guidelines to oversee AI applications.

AI Governance Body: A multidisciplinary committee comprising representatives from key offices within the agency. This committee is responsible for overseeing the implementation and operation of AI systems. The governance body ensures that AI initiatives align with standards, regulatory requirements, and the agency's strategic goals.

AI Use Case Inventory: A comprehensive list of all AI applications and use cases within an organization, detailing their purpose, scope, and compliance with regulatory standards. The inventory is used to manage AI deployments effectively and ensure transparency.

Safety-Impacting AI: AI applications that have the potential to cause physical harm or pose significant safety risks. These use cases require rigorous risk assessments and compliance with stringent safety standards.

Rights-Impacting AI: AI applications that can potentially affect individuals' civil rights, privacy, or other fundamental rights. These use cases require careful consideration of their implications and compliance with legal and regulatory requirements.

Generative AI: A class of AI models that emulate the structure and characteristics of input data to generate derived synthetic content, such as images, videos, audio, text, and other digital content.

Risk Management Framework: A structured approach for identifying, assessing, mitigating, and monitoring risks associated with AI applications. The framework includes preventive controls, monitoring mechanisms, and procedures for managing incidents and non-compliance.

Transparency and Accountability: Principles ensuring that the development and deployment of AI systems are open and transparent, with clear documentation and oversight to hold stakeholders accountable for their roles in AI governance.

Responsible AI Use: The capabilities to innovate and promote the responsible adoption, use, and continued development of AI, while ensuring appropriate safeguards are in place to protect privacy, civil rights, and civil liberties, and to mitigate any unlawful discrimination, consistent with the AI in Government Act.

AI Talent Development: Initiatives and programs that aim to build and maintain a skilled AI workforce through targeted recruitment, training, and career development opportunities.

Technology Review Process: A formal procedure for evaluating technology requests, including AI applications, to ensure they meet technical, ethical, and regulatory standards before approval and implementation.