



Pension Benefit
Guaranty Corporation

Policy Guidance on Generative Artificial Intelligence (AI)

December 2025

Prepared by PBGC's Chief Artificial Intelligence Officer (CAIO) and PBGC's Artificial Intelligence Working Group

Approval

PBGC's AI Compliance Plan is approved according to the undersigned.

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Version History

Revision	Date	Author(s)	Description
1.0	11/2025	PBGC's AI Working Group	Initial iteration of PBGC's Generative Artificial Intelligence Policy Guidance

Purpose and Background

In accordance with Executive Order 14179 and the Office of Management and Budget (OMB) Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*, the Pension Benefit Guaranty Corporation (“PBGC” or the “Agency”) was charged with “developing a policy that sets the terms for acceptable use of generative [artificial intelligence] for their missions and establishes adequate safeguards and oversight mechanisms that allow generative [artificial intelligence] to be used in the Agency without posing undue risk.” Agencies were directed to develop such a policy within 270 days. This Policy-Guidance describes PBGC’s terms of permissible use of Generative Artificial Intelligence (GenAI) (the “PBGC GenAI Policy-Guidance”).

The PBGC GenAI Policy-Guidance enables the Agency, via utilization of GenAI, to innovate, responsibly apply, and empower Agency personnel to effectively navigate their workloads and prioritize efficiencies to enhance PBGC’s operational excellence. The PBGC GenAI Policy-Guidance also ensures Agency personnel mitigate risks while engaging with GenAI, particularly those affecting the privacy and rights of individuals and PBGC’s Information Technology (IT) and data security.

To balance the ever-increasing utility of GenAI across all facets of life and throughout the Federal Government, while noting GenAI’s inherent potential risks and limitations, this Policy-Guidance will outline the code of conduct of permissible uses of GenAI at PBGC.

In addition to the permissible uses of GenAI, this Policy-Guidance will also outline the ownership, attribution, verification, and validation responsibilities for PBGC employees and contractors engaging with GenAI-created content within their professional duties.

Scope and Applicability

PBGC defines GenAI as technology that can create content, including text, images, audio, or video, when prompted by a user. GenAI systems create responses using algorithms that are trained often on open-source information, such as text and images from the Internet. However, GenAI systems are not cognitive and lack human judgment. GenAI output will require human review.

This PBGC GenAI Policy-Guidance is designed to work in concert with all other existing PBGC policies, including those related to IT security, privacy, and Controlled Unclassified Information (CUI). The PBGC GenAI Policy applies to all PBGC Federal and contractor users, affiliates that have access to PBGC network or data, and automated technologies that access PBGC content and data (collectively, the “PBGC Users”). This PBGC GenAI Policy-Guidance covers all use of GenAI at PBGC, including intentional and incidental uses. This PBGC GenAI Policy-Guidance also responds to the Office of Management and Budget (OMB) Memorandum M-25-22, *Driving Efficient Acquisition of Artificial Intelligence in Government* and supersedes PBGC’s existing authorities, but does not apply to PBGC’s Office of the Inspector General. This GenAI Policy-Guidance does not address acquisition of technologies/solutions; acquisition is governed by the Federal Acquisition Regulation, the PBGC FAR, Directive 15-1, and all other applicable laws, regulations and policies. [GenAI at PBGC](#)

I. Generative AI

Authorities

All PBGC Users that have access to PBGC’s network or data, and automated technologies that access PBGC content and data are subject to the following authorities during intentional and incidental uses of GenAI:

- a. Advancing American AI Act, Pub. L. No. 117-263, div. G, title LXXII, subtitle B, § 7224(d)(1) (2022)
- b. Executive Order 13960- Promoting the Use of Trustworthy Artificial Intelligence in the Federal Government; December 3, 2020
- c. Executive Order 14179 - Removing Barriers to American Leadership in Artificial Intelligence; January 12, 2025
- d. Office of Management and Budget (OMB) Memorandum M-25-21 - Accelerating Federal Use of AI through Innovation, Governance, and Public Trust; April 3, 2025
- e. M-25-22 (Acquisition one)
- f. Privacy Act, 5 U.S.C. § 552a
- g. Executive Order 13556, 75 Fed. Reg. 68675, Controlled Unclassified Information (CUI)
- h. 32 C.F.R. Part 2002, Controlled Unclassified Information
- i. OMB Memorandum M-19-15, *Improving Implementation of the Information Quality Act*
- j. PBGC Directive *PBGC Information Security Policy*, IM 05-02 (May 8, 2023)
- k. PBGC Directive *PBGC Privacy Program*, IM 05-09 (May 21, 2024)
- l. PBGC Directive *Protecting Personally Identifiable Information*, IM 10-03 (Sept. 25, 2025)
- m. PBGC Directive *Controlled Unclassified Information Program*, IM 10-07 (Oct. 27, 2025)
- n. PBGC Directive *Use of Information Technology Resources*, IM 05-04 (Oct. 25, 2021)
- o. PBGC Directive *Use of Information Technology Resources*, IM 05-07 (Oct. 20, 2023)

Roles and Responsibilities:

- A. PBGC Chief Artificial Intelligence Officer (PBGC CAIO):
 - a. The CAIO, in coordination with other Agency officials, shall (per OMB M-25-21):
 - i. Maintain the AI use case inventory in accordance with OMB requirements;
 - ii. Ensure that PBGC identifies which use cases meet the definition of high-impact AI and implements the minimum risk management practices identified in OMB guidance;
 - iii. Provide oversight of testing/evaluation of AI
 - iv. Proactively share custom-developed models/code across Federal Government
 - v. Report waivers and determinations as required by OMB guidance
 - vi. Oversee Compliance with this policy
 - vii. Execute Risk Acceptances, as necessary, related to the implementation and use of GenAI.
- B. PBGC Privacy Office:
 - a. Ensure compliance with the Privacy Act, OMB privacy guidance, and NIST requirements
 - b. Provide guidance on requirements under the Privacy Act and regulations;
 - c. Review PBGC's Data Impact Analysis and other documentation, when required, when use cases will process PII.
- C. PBGC Users:
 - a. Utilize GenAI for the benefit of PBGC and its stakeholders (internal and external)
 - b. Adhere to this Policy-Guidance
 - c. Safeguard PBGC data and information in accordance with relevant laws, regulations, and PBGC Directives
 - d. Steward and ensure ethical usage of GenAI
 - e. Review all output from GenAI to guard against hallucinations, bias, and other errors.
 - f. Cite to GenAI when used to create content

II. Generative AI Use Code of Conduct by PBGC Users

PBGC uses GenAI to fulfill and advance the mission of the Agency in accordance with the applicable law, regulations, and policies. PBGC's use of GenAI is safe, secure, responsible, and human-centered. PBGC ensures such use of GenAI has undergone evaluation, accessing only appropriate data, adhering to information management policies, and in compliance with this PBGC GenAI Policy-Guidance and applicable laws and government policies. PBGC Users shall utilize GenAI that has been procured and/or approved by the Agency.

Use Case Documentation and Evaluation

GenAI use cases will follow the PBGC AI Use Case reporting and evaluation processes and procedures. All AI (including GenAI) uses cases must be submitted to CAIO (or delegated personnel)

1. CAIO (or delegated personnel) will facilitate use case activities
 - a. Internal documentation
 - b. External Reporting
2. PBGC Users will inform CAIO (or delegated personnel) of AI (including GenAI) use cases (via established process/medium)
3. CAIO (or delegated personnel) will ensure execution of High-Impact AI¹ use case practices per OMB M-25-21

Content Generation

1. Prompts (GenAI questions and searches) or inputs by PBGC Users to generate and further refine output(s) from GenAI models shall be lawful and mission appropriate²
 - a. PBGC Users shall review prompts and documents for PII and CUI prior to submitting the prompt or upload of document(s) into GenAI.
 - b. PBGC Users shall ensure that they are only using PII for the purpose for which it was collected, per the Privacy Act.
2. PBGC Users utilizing GenAI will be accountable for the output(s) of the model(s), ensuring the accuracy, usefulness, and validity of all content generated for official PBGC work.
3. Ownership of generated content will be attributed to the person(s) that initiates the creation of content, and such content will be subject to all relevant PBGC policies and rules of behavior.
4. PBGC Users utilizing GenAI generated content for official PBGC work shall include citations.
5. Generated content will not be inappropriate, discriminatory, or harmful.
6. Any content generated by GenAI models by PBGC Users shall not impersonate real individuals (likeness of image, voice, signature, etc.) without written consent, and approval of such mission-specific use by such individual(s) and the appropriate Manager of the PBGC User of created content.

Technology

1. Use of trial and "free" GenAI tools are approved for solutions authorized by CAIO and SAOP.

¹ Per <OMB M-25-21> High-Impact AI is defined as:

AI with an output that serves as a principal basis for decisions or actions with legal, material, binding, or significant effect on: a. an individual or entity's civil rights, civil liberties, or privacy; or b. an individual or entity's access to education, housing, insurance, credit, employment, and other programs; c. an individual or entity's access to critical government resources or services; d. human health and safety; e. critical infrastructure or public safety; or f. strategic assets or resources, including high-value property and information marked as sensitive or classified by the Federal Government.

² Lawful and Mission-Appropriate: Use of GenAI at PBGC complies with the Constitution, applicable laws, and government-wide and PBGC policies, including those protecting privacy, controlled unclassified information (CUI), civil rights, and civil liberties.

2. Technology requests, acquisitions, and deployment will adhere to Directives IM 05-04 Use of Information Technology Resources and IM 05-07 Use of Information Technology Resources
 - a. Approved Standards [technologies] will be documented on the Technical Reference Model
 - b. The Technical Review Board (TRB) will evaluate technology requests
 - c. The IT Infrastructure Operations Department (ITIOD) will facilitate the Change and Release Process and the ITIOD Change and Release Standard Operating Procedures

3. Prohibited Uses (specific to GenAI capabilities):

The following uses of GenAI at PBGC and uses of associated data are prohibited:

- a. Relying on outputs of GenAI as the sole basis for an adjudication, civil, or criminal enforcement action; or denial of pension or government benefits;
- b. Providing PBGC data, or outputs from the use of GenAI at PBGC, to third parties for uses of GenAI that are prohibited by applicable laws and government-wide and PBGC policies, including this PBGC GenAI Policy-Guidance;
- c. Use of protected participant, plan sponsor, or employee/contractor data for unsanctioned functions into GenAI models, including using PII for a purpose other than what it was collected for;
- d. Personal use that exceeds permissible use detailed in PBGC's Personal Use of Office Equipment and IT Resources policy³;
- e. Other uses of GenAI or associated data that are prohibited by applicable laws and government-wide and PBGC policies;
- f. User violating this – or any other policy put forth by this document – may be subjected to discipline.

Safeguards and Oversight

PBGC cybersecurity and enterprise IT guidelines will provide approaches and tactics to ensure compliance and alignment of IT investments with mission goals and objectives. Safeguarding the utilization of GenAI will be multilayer approach.

1. The foundational technical layer is based on the security of PBGC's infrastructure.
2. All data, particularly Personally Identifiable Information and Controlled Unclassified Information, will be adequately protected including the use of Data Loss Prevention tools to safeguard against data leaks or spills.
3. Compliance will also align with other PBGC policies, including but not limited to:
 - a. Directive IM-05-04 Use of Information Technology
 - b. PBGC IT Rules of Behavior
 - c. Directive PM 30-1 Disciplinary and Adverse Actions
 - d. Directive 15-3 Suspension and Debarment Program
4. Accountability of generated content will be the responsibility of the person(s) that initiates the creation of content

Definitions

- a. Generative Artificial (GenAI). A technology that can create content, including text, images, audio, or video, when prompted by a user. Generative AI systems create responses using algorithms that are trained often on open-source information, such as text and images from the internet. However, generative AI systems are not

³ Limited Personal Use of Office Equipment and IT Resources section of Directive IM 05-04 Use of Information Technology Resources

- cognitive and lack human judgment. (Science & Tech Spotlight: Generative AI. GAO. <https://www.gao.gov/assets/830/826491.pdf>)
- b. Chief Artificial Intelligence Officer (CAIO). Agency designated representative at or above Grade 14 of the General Schedule (GS) with the necessary authority to perform the responsibilities detailed in OMB M-25-21 and must be positioned highly enough to engage regularly with other agency leadership, to include the Deputy Secretary or equivalent.
 - c. GenAI User Prompt (Prompt). The natural language text, question, command, or attachment input into a Generative AI technology/tool that instructs and requests the technology/tool perform task(s) to create/produce output(s) (text, images, code, etc.).
 - d. Personnel Identifiable Information (PII). Information that can be used to distinguish or trace an individual's identity either alone or when combined with other information that is linked or linkable to a specific individual. PII includes information relating to individual participants and beneficiaries in covered pension plans, to PBGC employees, and to PBGC contractors.
 - e. Controlled Unclassified Information. (CUI). Information that requires safeguarding and/or dissemination controls pursuant to and consistent with law, regulations, and Government-wide policies, excluding classified information.