

IMPLEMENTATION FIDELITY · NIST AI RMF

Documentation Compliance vs. Operational Compliance: The RMF Gap

NIST AI RMF implementation is accelerating. Agencies are producing documentation. Risk registers are populated. Internal review cycles are completing.

Documentation compliance and operational compliance are not the same thing. What is not being tracked is whether that documentation reflects how AI systems operate.

Documentation compliance means an agency completed the required RMF artifacts, submitted them on schedule, and received authorization. The governance process ran. The record shows compliance.

Operational compliance means the governance mechanisms built around a system are actively catching and responding to real operational behavior. Risk characterizations are being updated as systems evolve. Scope changes are triggering reviews. Human oversight checkpoints are functioning as genuine controls rather than scheduled signoffs.

The gap between these two states is not measured anywhere in current federal AI governance practice.

An agency with perfect documentation can be operationally non-compliant. If a system has changed scope since authorization, expanded its use cases, or drifted in its decision patterns, the documentation record will still show clean. Current audit mechanisms cannot distinguish between them because they assess the documentation, not the operational state.

This is the central research question for GIAG Stream One. Not whether agencies are implementing the NIST AI RMF — but whether implementation is producing governance outcomes or governance records. Those are different questions, and right now almost no one is asking the second one.

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