

## GOVERNANCE TIMING · IMPLEMENTATION FIDELITY

# Three Governance Clocks, and All of Them Are Running Behind

Government AI governance has a timing problem. Not one, but three distinct clocks, running at different speeds. And none of them are synchronized with how AI systems actually function.

## The Assessment Clock

AI systems get assessed before deployment. After that, assessment cadences typically align with audit cycles, budget cycles, or annual review schedules. These cycles were designed for systems that change slowly. AI deployments change quickly, particularly agentic systems in live workflows. By the time the next assessment occurs, the system being assessed is often not the system currently running. The documentation describes a prior state.

## The Policy Clock

OMB guidance, agency-level AI use policies, and RMF implementation plans are drafted and approved on bureaucratic timelines. The policy governing a deployment was often written before the deployment existed, or before the capability it addresses was understood. M-25-21 and M-25-22 are currently driving agency compliance activity. The agentic deployment patterns those memos were designed to govern are already more advanced than the policy architecture that describes them.

## The Accountability Clock

When something goes wrong, the accountability mechanism engages: incident review, inspector general inquiry, GAO audit, congressional attention. This clock runs slowest of all, often by years. It operates on the documentation that existed at authorization, not at the time of the incident. The gap between what was authorized and what was operating at the time of the failure is rarely the first question asked.

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*All three clocks are asynchronous with each other and with AI operational tempo.*

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NIST AI RMF implementation fidelity and human oversight quality in agentic systems are both expressions of the same underlying timing misalignment. The governance structures agencies are building were designed for a slower clock than the systems they are governing.

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