

IMPLEMENTATION FIDELITY · NIST AI RMF

## Federal AI Governance Produces Two Kinds of Records. Most Agencies Cannot Tell Them Apart.

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Federal AI governance currently produces two kinds of records. Most agencies cannot tell them apart.

**The first kind** documents that a governance process ran. Artifacts were produced. Reviews were completed. Authorization was granted. The record is accurate and auditable.

**The second kind** documents that a governance process worked. Risk characterizations were updated as the system evolved. Scope changes triggered reviews. Oversight mechanisms caught something and changed a decision that would otherwise have gone through.

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*The first kind of record is what almost every current federal AI audit mechanism is designed to verify.  
The second kind is what governance is supposed to produce.*

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No standard methodology exists for distinguishing between them — which means agencies generating the first kind can report the same compliance score as agencies generating the second.

That measurement gap is the central research question for GIAG Stream One. If documentation of governance activity and evidence of governance outcomes are indistinguishable at the audit level, the measurement system is not measuring governance. It is measuring paperwork.

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