

RMF PRACTICE · RISK REGISTERS

A Diagnostic for AI Risk Registers in Government: Three Questions Most Agencies Cannot Answer

Most agencies have an AI risk register. Few can answer these three questions about it:

- Who updates the register when the model is retrained?
- Who updates it when the deployment scope expands?
- Who has standing to halt a deployment if the register triggers a threshold?

If those answers are not in writing and tied to named individuals, the register is functioning as a compliance exhibit, not a governance instrument.

Accountability without a named owner is a policy intention. It is not governance.

The pattern emerging through GIAG research: the register gets built during assessment, NIST AI RMF categories get populated, and leadership approves it. Then the model goes into production and the register stops moving. Not because anyone decided to neglect it — because nobody was ever assigned to own it.

This is one of the structural gaps Stream One of the Government IT and AI Governance Initiative is designed to document: where implementation fidelity breaks down between framework adoption and operational practice.

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