

5 Signs Your AI Governance Is Already Failing

And how to fix it...

Ben Brendle
Collibra Public Sector

Agenda

- 01 The GAO wake-up call: what's now on the record

- 02 Five documented failure modes behind federal AI governance breakdowns

- 03 Findings and dates you can bring back to your leadership

- 04 Practical framework connecting governance to real risk reduction

- 05 Language for the leadership conversation

- 06 How to get ahead of the next audit



The GAO Wake-Up Call...



Adoption Is Outpacing Governance

What GAO documented across federal agencies, 2023–2026

1,110

AI use cases reported by 11 selected agencies in 2024, nearly double 2023's 571

9x

Growth in generative AI use cases, 2023 to 2024 (32 to 282)

445

High-impact AI use cases among 3,611 reported across 41 agencies, as of April 2026

Sources: GAO-25-107653; Atlantic Council / OMB data (April 2026)



The Public Already Distrusts AI

How Americans rate their own comfort with AI

>50%

Of U.S. adults say the increased use of AI in daily life
makes them feel more concerned than excited

*Source: Pew Research Center, "Key findings about how Americans view artificial intelligence"
(March 2026)*

The 5 Warning Signs

WHERE GAO IS ALREADY FINDING THE GAPS



Sign #1: Adoption Is Outpacing Policy

Deployment is moving faster than the policy meant to govern it



The Finding

GAO found that federal use of generative AI increased ninefold from 2023 to 2024, and agencies still reported struggling to keep policies current with how fast the technology was being deployed. Executive guidance has itself been a moving target: EO 14110 was rescinded in January 2025, replaced by OMB M-25-21 and M-25-22 that April, then updated again by M-26-04 in December 2025.

Source: GAO-25-107653 (Jul 29, 2025)



What It Means

Federal AI use cases nearly doubled — 571 to 1,110 — across 11 selected agencies in one year, while generative AI use cases grew ninefold in that same window. Result: governance policy is chasing a moving target instead of setting the pace.



Sign #2: Oversight Is Fragmented

No single owner sees the whole picture



The Finding

GAO identified 94 AI-related requirements that are government-wide or have government-wide implications, spanning federal laws, executive orders, and guidance.

Source: GAO-25-107933 (Sep 9, 2025)



What It Means

Ten separate executive branch oversight and advisory groups share a role in implementing and overseeing federal AI use, with no single body accountable for the whole picture. Result: gaps fall through the cracks between bodies, not within them.



Sign #3: The Workforce Gap Is Showing

Frameworks exist on paper — capacity to run them often doesn't



The Finding

GAO's AI Accountability Framework lays out key practices for governance, data, performance, and monitoring across the AI lifecycle.



What It Means

GAO has also testified that a severe shortage of federal staff with AI expertise limits how well agencies can actually apply that framework in practice. Result: governance becomes a document on a shelf, not a practice in production.

Source: GAO-23-106811 (May 16, 2023 testimony); GAO-21-519SP



Sign #4: Risk assessment lags deployment

Risk assessment is being retrofitted onto systems already in production



The Finding

GAO reviews have found agencies moving high-impact AI into production faster than they can assess its risks.



What It Means

DHS, for example, has been found to need improved risk-assessment guidance for AI used in critical infrastructure, and to better address risk and privacy protections in AI-enabled technologies. Result: risk assessment happens after deployment, not before it.

Source: GAO-25-107435 (Dec 18, 2024); GAO-25-107302



Sign #5: Procurement Outpaces Policy

Agencies are buying AI capability faster than they're building the muscle to govern it



The Finding

GAO found agencies more than doubled use of AI from 2023 to 2024 and used a mix of agency-directed and vendor-driven approaches to acquire it, sometimes with industry introducing capabilities before agencies had set requirements.

Source: GAO-26-107859 (Apr 13, 2026)



What It Means

GAO recommended agencies systematically collect and apply lessons learned across procurements. Result: contracts close faster than governance can catch up.



What Best-in-Class Governance Looks Like

FROM FRAMEWORK ON PAPER TO PRACTICE



The Practical Framework

GAO's four-principle accountability model, applied



1. Governance

Set clear goals, ownership, and accountability for every AI use case



2. Data

Ensure the quality, lineage, and representativeness of what feeds the model



3. Performance

Test for bias, accuracy, and impact before and after deployment



4. Monitoring

Keep watching after go-live — systems drift, and so does risk



**Data governance is the control point
for everything downstream:
breaches, compliance, and public
trust.**

The Leadership Conversation

Three reframes for briefing leadership

FROM: IT Problem

TO: Risk control point — the same governance gaps GAO documents show up as bias, breach, and compliance findings

FROM: Compliance Checkbox

TO: Trust enabler — the public and oversight bodies judge agencies on outcomes, not intentions

FROM: Cost Center

TO: Audit-readiness investment — the agencies GAO cites favorably are the ones that governed before they were asked to



Thank you

Get ahead of the next audit

Ben Brendle

Collibra, Public Sector



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Practical framework
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Language for the
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The GAO Wake-Up Call...

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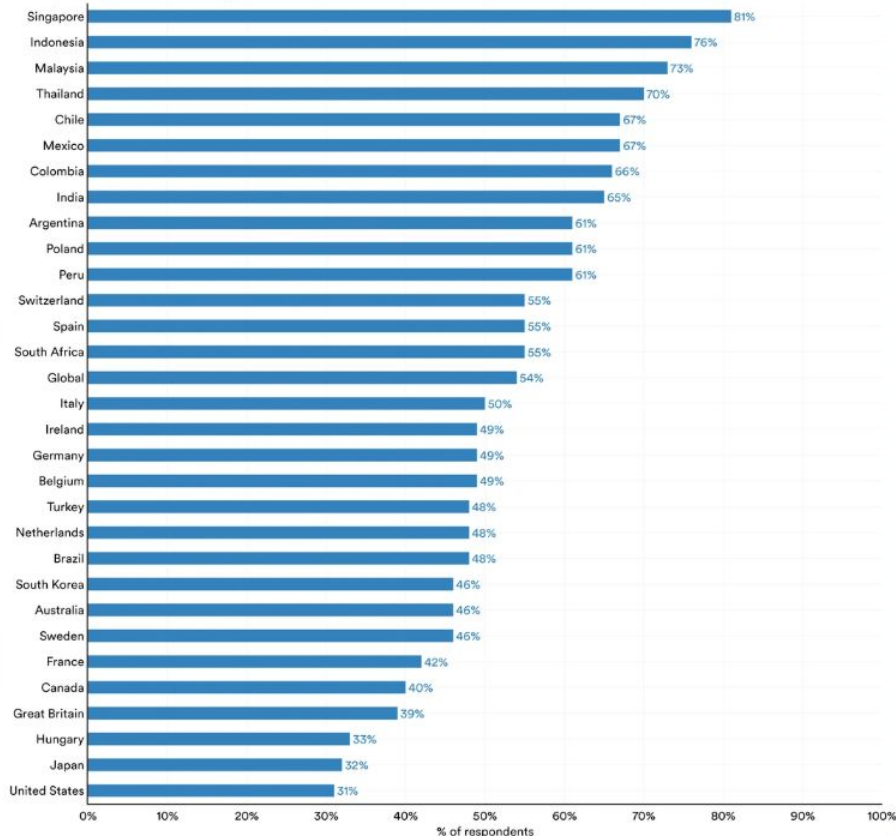
The U.S. public is already short on trust...

The US ranks DEAD LAST in Trust in government regulation of AI by country at

31%

Trust in government regulation of AI by country (% of total), 2025

Source: Ipsos, 2025 | Chart: 2026 AI Index report



Source: [Stanford University Human-Centered Artificial Intelligence Survey](#)

WHERE GAO IS ALREADY FINDING THE GAPS

What are the 5 Signs Your AI Governance Is Already Failing?

Sign #1: Adoption Is Outpacing Policy

Deployment is moving faster than the policy meant to govern it

- GAO found that federal use of generative AI increased ninefold from 2023 to 2024
- Agencies still reported struggling to keep policies current with how fast the technology was being deployed.
- Executive guidance itself has been a moving target: *EO 14110 was rescinded in January 2025, replaced by OMB M-25-21 and M-25-22 that April, then updated again by M-26-04 in December 2025.*
- Federal AI use cases nearly doubled 571 to 1,110, across 11 selected agencies in one year
- Generative AI use cases grew ninefold in that same window outpacing agencies' ability to update policy
- **Result:** governance policy is chasing a moving target instead of setting the pace

Source: GAO-25-107653 (Jul 29, 2025)

Sign #2: Oversight Is Fragmented

No single owner sees the whole picture

- GAO identified 94 AI-related requirements that are government-wide or have government-wide implications, spanning federal laws, executive orders, and guidance
- Ten separate executive branch oversight and advisory groups share a role in implementing and overseeing federal AI use — with no single body accountable for the whole picture

- **94 government-wide AI-related requirements** identified across statutes and guidance
- **10 executive branch oversight and advisory groups** share a role in AI implementation and oversight
- **Result:** gaps fall through the cracks between bodies, not within them

Source: GAO-25-107933 (Sep 9, 2025)

Sign #3: The Workforce Gap Is Showing

Frameworks exist on paper — capacity to run them often doesn't

- GAO's AI Accountability Framework lays out key practices for governance, data, performance, and monitoring across the AI lifecycle.
- But GAO has also testified that a severe shortage of federal staff with AI expertise limits how well agencies can actually apply that framework in practice.
- Agencies face a severe shortage of staff with AI expertise
- The 2021 Accountability Framework sets the practices — implementation depends on people to run them
- **Result:** governance becomes a document on a shelf, not a practice in production

***Source:** GAO-23-106811 (May 16, 2023 testimony), (GAO-21-519SP)*

Sign #4: Bias Error Risk Is an Afterthought

Risk assessment is being retrofitted onto systems already in production

- GAO reviews have found agencies moving high-impact AI into production faster than they can assess its risks.
- DHS, for example, has been found to need improved risk-assessment guidance for AI used in critical infrastructure sectors, and to better address bias risk and privacy protections in AI-enabled law enforcement technologies.
- DHS needs to improve risk-assessment guidance for AI used in critical infrastructure sectors
- DHS could better address bias risk and enhance privacy protections in law enforcement technologies
- **Result:** risk assessment happens after deployment, not before it

Sign #5: Procurement Outpaces Policy

Agencies are buying AI capability faster than they're building the muscle to govern it

- GAO found agencies more than doubled use of AI from 2023 to 2024 and used a mix of agency-directed and vendor-driven approaches to acquire it — sometimes with industry introducing capabilities before agencies had set requirements.
 - GAO recommended agencies systematically collect and apply lessons learned across procurements.
- AI use more than doubled 2023 to 2024, acquired through a mix of approaches
 - Some AI capability arrived vendor-driven, ahead of agencies defining their own requirements
 - **Result:** contracts close faster than governance can catch up

Source: GAO-26-107859 (Apr 13, 2026)

FROM FRAMEWORK ON PAPER TO PRACTICE

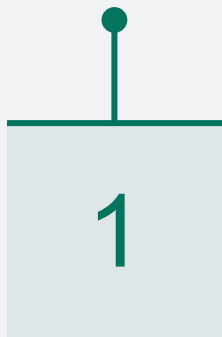
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The Practical Framework

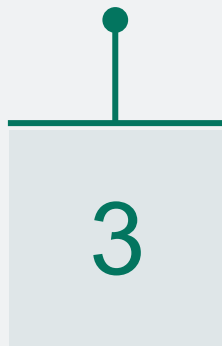
GAO's four-principle accountability model, applied



Governance: set clear goals, ownership, and accountability for every AI use case



Performance: test for bias, accuracy, and impact before and after deployment



Data: ensure the quality, lineage, and representativeness of what feeds the model



Monitoring: keep watching after go-live — systems drift, and so does risk



“Data governance is the control point for everything downstream in the future: bias, breaches, compliance, and public trust.”

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The Leadership Conversation

Three reframes for briefing leadership

- When you brief leadership, the framing matters as much as the facts.
- Support the case with data...
- These three reframes shift data governance from a back-office compliance task to the control point decision-makers already care about.

From “IT problem”

To “risk control point” — the same governance gaps GAO documents show up as bias, breach, and compliance findings

From “compliance checkbox”

To “trust enabler” — the public and oversight bodies judge agencies on outcomes, not intentions

From “cost center”

To “audit-readiness investment” — the agencies GAO cites favorably are the ones that governed before they were asked to



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