EMBERION DIGITAL LLC

AI GOVERNANCE READINESS ROADMAP

Gap to Action Plan
Aligned to NIST AI RMF

GOVERN ♦ MAP ♦ MEASURE ♦ MANAGE

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Citations & References

This roadmap is grounded in authoritative federal AI governance standards and frameworks. All assessment criteria, maturity definitions, and risk management language are aligned to the sources below. Citations have been verified and updated as of July 2026.

Important — Regulatory Updates Federal AI policy has changed significantly since 2024. EO 14110 was rescinded January 20, 2025 and replaced by EO 14179. OMB M-24-10 was superseded by OMB M-25-21 in April 2025. The NIST AI RMF 1.0 is under active revision. The four core functions (GOVERN, MAP, MEASURE, MANAGE) remain current and are the foundation of this roadmap. Always verify regulatory status at airc.nist.gov and whitehouse.gov/omb before using this document for compliance reporting.

[1] NIST AI Risk Management Framework (AI RMF 1.0)

National Institute of Standards and Technology. (2023). Artificial Intelligence Risk Management Framework (AI RMF 1.0). NIST AI 100-1. Note: The AI RMF 1.0 is currently under active revision (2025–2026) per the White House AI Action Plan. The four core functions — GOVERN, MAP, MEASURE, MANAGE — remain the authoritative framework. Check airc.nist.gov for the latest version.

https://airc.nist.gov/airmf-resources/airmf/

The primary framework this roadmap is built on. Defines the four core functions: GOVERN, MAP, MEASURE, MANAGE. All scoring criteria and subcategories in this roadmap are aligned to AI RMF 1.0.

[2] NIST AI RMF Playbook

National Institute of Standards and Technology. AI RMF Playbook — Suggested Actions for Each AI RMF Core Function and Subcategory. Note: The Playbook will be updated following the AI RMF revision currently in progress. Current version remains applicable.

https://airc.nist.gov/airmf-resources/playbook/

Provides suggested actions for operationalizing each AI RMF function. Referenced for subcategory criteria and maturity guidance used throughout this roadmap.

[3] Executive Order 14179 — Removing Barriers to American Leadership in Artificial Intelligence

The White House. (January 23, 2025). Executive Order on Removing Barriers to American Leadership in Artificial Intelligence. EO 14179. This order replaced Executive Order 14110 (rescinded January 20, 2025) and establishes the current federal AI policy framework emphasizing innovation, competitiveness, and responsible adoption.

https://www.whitehouse.gov/presidential-actions/2025/01/removing-barriers-to-american-leadership-in-artificial-intelligence/

Current governing executive order on federal AI. Note: EO 14110 was rescinded January 20, 2025. Downstream NIST publications, agency AI inventories, and contract-level requirements established under EO 14110 continue to bind contractors unless separately rescinded by their issuing authority.

[4] NIST Trustworthy and Responsible AI Resource Center

National Institute of Standards and Technology. NIST AI Resource Center (AIRC) — central repository for AI RMF, Playbook, AI 600-1, and all supporting AI governance documentation.

https://airc.nist.gov

Official NIST hub for all AI governance resources. Recommended as the primary source for monitoring AI RMF updates, new profiles, and playbook revisions as they are released.

[5] NIST AI 600-1 — Generative AI Profile

National Institute of Standards and Technology. (2024). Artificial Intelligence Risk Management Framework: Generative Artificial Intelligence Profile. NIST AI 600-1. Produced with input from a public working group of 2,500 participants. Covers 13 generative AI risks and 400+ recommended actions.
https://airc.nist.gov/technical-reports/
Extends the AI RMF for generative AI systems. Referenced for bias, transparency, and security assessment criteria in the MEASURE function of this roadmap

[6] IAPP AI Governance Professional (AIGP) Certification

International Association of Privacy Professionals. (2024). AI Governance Professional (AIGP) Certification — Body of Knowledge. The AIGP is the leading professional certification for AI governance practitioners.
hhttps://iapp.org/certify/aigp
Professional certification framework for AI governance practitioners. Informs governance role definitions, competency areas, and accountability structures referenced in the GOVERN function.

How to Use This Roadmap

This Remediation Roadmap is designed to be used alongside the AI Governance Readiness Assessment Scoring. Tool (Excel) and the Readiness Assessment Report (PDF). Complete the scoring tool first, then use your results to populate this roadmap with targeted gap-to-action plans for each NIST AI RMF function. This document is intended to be used as a tool to develop your own compliance as it relates to your business environment.

Before You Begin
Complete the AI Governance Readiness Assessment Scoring Tool and note your maturity tier and function scores before working through this document. Replace all bracketed placeholders [like this] with your organization's specific information.

Roadmap Structure

- Section 1: Organization & Assessment Summary — transfer key details from the AI Governance Readiness Assessment Scoring Tool
- Section 2: Function-by-Function Gap Analysis — document gaps and actions for each NIST AI RMF function
- Section 3: Master Action Plan — consolidated prioritized action table with owners and timelines
- Section 4: 90-Day Quick Win Plan — immediate actions for the first 90 days
- Section 5: Progress Tracking — milestone check-ins at 30, 60, and 90 days

1. Organization & Assessment Summary

Organization Name: _____

Contract / Agreement Type: *Prime / Subcontractor / IDIQ Task Order*

CAGE Code: _____

Assessment Date: _____

Assessor Name: _____

Overall Maturity Tier: *INITIAL / DEVELOPING / DEFINED / MANAGED / OPTIMIZED*

Overall Score: ___ */ 250*

Function Scores

NIST FUNCTION	SCORE	MAX	% ACHIEVED	TIER
GOVERN		65		
MAP		65		
MEASURE		60		
MANAGE		60		
TOTAL		250		

Maturity Tier Reference

INITIAL (0–39%) — Ad hoc. No formal governance. High compliance risk.

DEVELOPING (40–59%) — Some practices. Significant gaps. Remediation plan required.

DEFINED (60–79%) — Documented. Consistent application. Moderate gaps.

MANAGED (80–94%) — Measured. Controlled. Minor gaps. Audit-ready.

OPTIMIZED (95–100%) — Continuous improvement. Fully NIST AI RMF aligned.

Assessment Narrative Summary

[Transfer or summarize your overall assessment narrative from the Readiness Assessment Report. 2–3 sentences describing the organization's current AI governance posture and the most critical areas for improvement.]

2. Function-by-Function Gap Analysis

Complete this section for each subcategory where your score was below 3 (Defined). Focus on the highest-impact gaps first. You do not need to complete every subcategory — only those where gaps exist.

NIST AI RMF — GOVERN FUNCTION

NIST AI RMF — GOVERN Function
Establish organizational practices, policies, and accountability structures for responsible AI risk management. Aligned to NIST AI RMF GOVERN function and OMB M-25-21 governance requirements.

GOVERN-1: Policies & Accountability

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

GOVERN-2: Culture & Training

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

GOVERN-3: Supply Chain & Third Party

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

NIST AI RMF — MAP FUNCTION

NIST AI RMF — MAP Function
dentify and understand the organizational context, AI use cases, and potential impacts before deployment. Supports AI inventory requirements under OMB M-25-21.

MAP-1: Context Establishment

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

MAP-2: AI System Inventory

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

MAP-3: Use Case Classification

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

NIST AI RMF — MEASURE FUNCTION

NIST AI RMF — MEASURE Function
Analyze, assess, and evaluate AI risks, bias, and performance on an ongoing basis. Referenced against NIST AI RMF MEASURE function and NIST AI 600-1 Generative AI Profile.

MEASURE-1: Risk Identification

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

MEASURE-2: Bias & Fairness

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

MEASURE-3: Performance & Monitoring

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

NIST AI RMF — MANAGE FUNCTION

NIST AI RMF — MANAGE Function
Prioritize, respond to, and continuously improve AI risk treatment and governance practices.

MANAGE-1: Risk Response

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

MANAGE-2: Incident Response

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

MANAGE-3: Continuous Improvement

CurrentScore:___ */ max*

Gap Description: *[What is missing or not yet implemented?]*

Root Cause: *[Why does this gap exist? Resource? Priority? Awareness?]*

Recommended Action: *[What specific action will close this gap?]*

Owner: *[Name or Role]*

Target Date: *[MM/YYYY]*

Priority: *High / Medium / Low*

3. Master Action Plan

Transfer your highest-priority actions from Section 2 into this consolidated table. Rank them by priority and assign clear owners and deadlines. This table becomes your governance program execution document.

#	ACTION ITEM	NIST FUNCTION	PRIORITY	OWNER	TARGET DATE	STATUS
1			H/M/L			
2			H/M/L			
3			H/M/L			
4			H/M/L			
5			H/M/L			
6			H/M/L			
7			H/M/L			
8			H/M/L			
9			H/M/L			
10			H/M/L			
11			H/M/L			
12			H/M/L			
13			H/M/L			
14			H/M/L			
15			H/M/L			

4. 90-Day Quick Win Plan

Regardless of your overall maturity tier, there are actions every organization can take immediately. Use this section to commit to specific quick wins in each 30-day window.

Days 1–30: Foundation

Focus
Establish the basics. These are the non-negotiables that every federal contractor needs before anything else.

- Assign a named AI Governance Lead or Officer
- Complete or update your AI systems inventory
- Publish or update your AI acceptable use policy
- Identify your top 3 highest-risk AI systems for priority review

Day 1–30 Commitment (organization-specific action): _____

Owner: _____

Success Metric: How will you know this is done?

Days 31–60: Risk Assessment & Controls

Focus
Close the most critical gaps identified in your assessment. Start with High-risk findings.

- Complete risk assessments for all High-risk AI systems
- Assign system owners to all inventoried AI systems
- Launch AI literacy training for relevant staff
- Establish an AI incident reporting channel

Day 31–60 Commitment (organization-specific action): _____

Owner: _____

Success Metric: _____

Days 61–90: Monitoring & Documentation

Focus
Build the evidence trail. Auditors and primes want documentation, not just intentions.

- Document all existing controls and evidence for each AI system
- Conduct first internal AI governance audit or self-review
- Report governance program status to executive leadership
- Schedule the next quarterly AI governance review

Day 61–90 Commitment (organization-specific action): _____

Owner: _____

Success Metric: _____

5. Progress Tracking

Use this section to document progress at 30, 60, and 90-day milestones. Keep this document updated and share with your AI Governance Lead and executive sponsor.

30-Day Check-In

Date of Check-In: _____

Actions Completed: _____

Actions In Progress: _____

Blockers / Issues: _____

Revised Maturity Tier Estimate: *INITIAL / DEVELOPING / DEFINED / MANAGED / OPTIMIZED*

60-Day Check-In

Date of Check-In: _____

Actions Completed: _____

Actions In Progress: _____

Blockers / Issues: _____

Revised Maturity Tier Estimate: _____

90-Day Check-In

Date of Check-In: _____

Actions Completed: _____

Updated Overall Score: ___ */ 250*

Updated Maturity Tier: _____

Recommended Next Steps for Next 90 Days: _____