Summit AI Governance
Privacy by Design Program Build

Operationalizing DPIA + ROPA for Federal AI Systems

Aligned to OMB M-24-10, EO 14110, and NIST AI RMF.

Designed for agencies deploying AI that processes personal data.

Federal AI Governance Is Operational

OMB M-24-10 requires:
- AI inventory & impact classification
- Pre-deployment risk review
- Ongoing oversight documentation

EO 14110 emphasizes privacy, civil rights, and transparency.

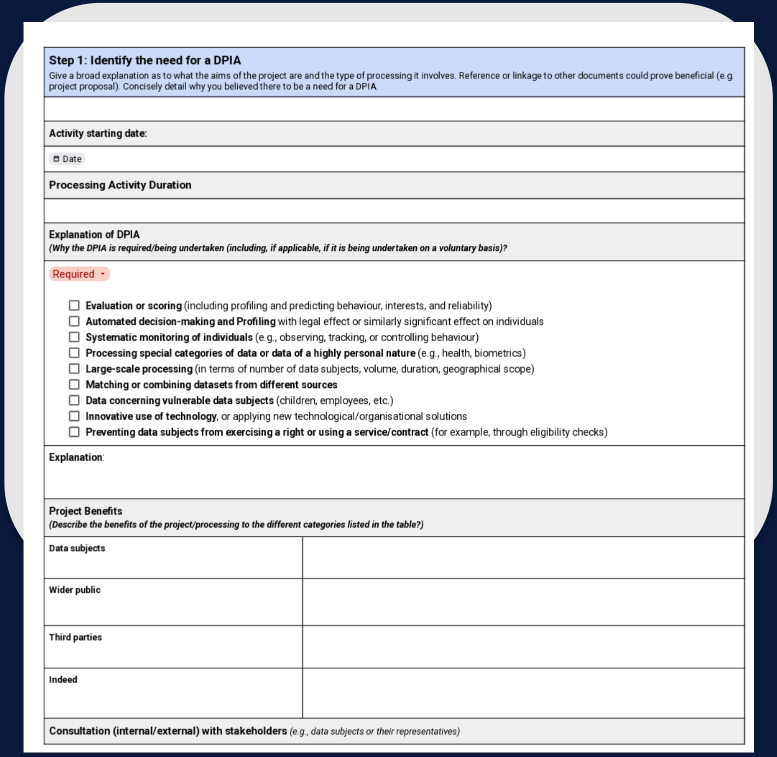
AI systems touching personal data require formal privacy artifacts.

DPIA / PIA: Structured Risk Assessment

DPIA evaluates:

- Purpose and legal authority
- Data subject categories
- Automated decision-making risk
- Mitigation controls

Mandatory for high-impact AI under OMB guidance.



Step 1: Identify the need for a DPIA

Give a broad explanation as to what the aims of the project are and the type of processing it involves. Reference or linkage to other documents could prove beneficial (e.g. project proposal). Concisely detail why you believed there to be a need for a DPIA.

Activity starting date:

Date

Processing Activity Duration

Explanation of DPIA
(Why the DPIA is required/being undertaken (including, if applicable, if it is being undertaken on a voluntary basis)?

Required

- □ **Evaluation or scoring** (including profiling and predicting behaviour, interests, and reliability)
- □ **Automated decision-making and Profiling** with legal effect or similarly significant effect on individuals
- □ **Systematic monitoring of individuals** (e.g., observing, tracking, or controlling behaviour)
- □ **Processing special categories of data or data of a highly personal nature** (e.g., health, biometrics)
- □ **Large-scale processing** (in terms of number of data subjects, volume, duration, geographical scope)
- □ **Matching or combining datasets from different sources**
- □ **Data concerning vulnerable data subjects** (children, employees, etc.)
- □ **Innovative use of technology**, or applying new technological/organisational solutions
- □ **Preventing data subjects from exercising a right or using a service/contract** (for example, through eligibility checks)

Explanation:

Project Benefits
(Describe the benefits of the project/processing to the different categories listed in the table?)

Data subjects	
Wider public	
Third parties	
Indeed	

Consultation (internal/external) with stakeholders *(e.g., data subjects or their representatives)*

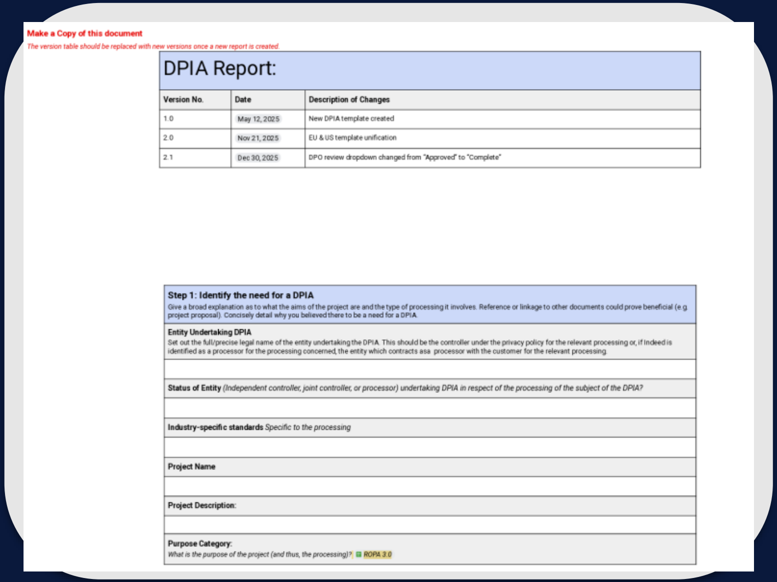
ROPA: Operational System-of-Record

ROPA documents:

- Data categories & subjects
- Retention & deletion
- Third-party sharing
- Purpose limitation

DPIA = Risk evaluation

ROPA = Inventory & governance record.



Make a Copy of this document

The version table should be replaced with new versions once a new report is created.

DPIA Report:

Version No.	Date	Description of Changes
1.0	May 12, 2025	New DPIA template created
2.0	Nov 21, 2025	EU & US template unification
2.1	Dec 30, 2025	DPO review dropdown changed from "Approved" to "Complete"

Step 1: Identify the need for a DPIA Give a broad explanation as to what the aims of the project are and the type of processing it involves. Reference or linkage to other documents could prove beneficial (e.g project proposal). Concisely detail why you believed there to be a need for a DPIA.
Entity Undertaking DPIA Set out the full/precise legal name of the entity undertaking the DPIA. This should be the controller under the privacy policy for the relevant processing or, if Indeed is identified as a processor for the processing concerned, the entity which contracts asa processor with the customer for the relevant processing.
Status of Entity *(Independent controller, joint controller, or processor) undertaking DPIA in respect of the processing of the subject of the DPIA?*
Industry-specific standards *Specific to the processing*
Project Name
Project Description:
Purpose Category: *What is the purpose of the project (and thus, the processing)?* 🟩 *ROPA 3.0*

Operational Model for Agencies

Phase 1: AI Use Case Inventory
Phase 2: Risk Triage & DPIA Execution
Phase 3: ROPA Documentation
Phase 4: Control Mapping to NIST & OMB

Outcome: Audit-ready evidence pack.

Why This Is Critical for AI Deployment

Without DPIA + ROPA:

- Undefined accountability
- Civil rights exposure
- Procurement delays

With structured artifacts:

- Defensible governance
- Reduced approval friction
- Scalable oversight framework