

ODA3 INSTITUTE

ADOPTION GUIDE

Mapping GAISSF™ to **NIST AI RMF**

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Executive Summary

Organizations already working from the NIST AI Risk Management Framework (AI RMF) often ask the same question before adopting GAISSF™: does this mean starting over? This guide answers that directly. It is not a control-by-control crosswalk — it is a structural orientation showing where NIST AI RMF and GAISSF™ address related concerns differently, where GAISSF™ may add control or evidence granularity, and what should be examined through a formal crosswalk.

METHODOLOGY NOTE

This guide is introductory and conceptual. It contains no client outcome data, no proprietary telemetry, and no incident statistics. It does not constitute a formal conformance mapping or certification determination. Reference baseline: NIST AI RMF 1.0 (NIST AI 100-1, January 2023). As verified on 12 August 2026, NIST states that AI RMF 1.0 is under revision. This guide should be revalidated against any superseding release.

1. Why This Comparison Matters

NIST AI RMF is a voluntary AI risk-management framework organized around four functions: Govern, Map, Measure, and Manage. NIST AI RMF is organized around risk-management functions, categories, subcategories, outcomes, and actions rather than a prescriptive control catalogue; its Playbook adds suggested tactical actions and documentation practices. GAISSF™ uses a control-based architecture: 9 domains and a published architecture comprising 52 foundational controls, with explicit evidence expectations, designed to complement and be mapped against frameworks like NIST AI RMF rather than replace them.

The objective of this guide is to identify where existing governance and risk-management work already provides coverage, where the two frameworks address related concerns differently, and where a formal crosswalk should examine correspondence, gaps, and reuse — rather than assuming them.

2. Structural Comparison

Aspect	NIST AI RMF	GAISSF™
Structure	4 functions (Govern, Map, Measure, Manage), with categories/subcategories	9 domains, 52 foundational controls
Orientation	Risk-management outcomes and actions	Control requirements, implementation, assurance evidence
Evidence model	Documentation, measurement, TEVV integral; format context-dependent	Explicit control-linked evidence expectations
Flexible/lightweight adoption	Selected Core outcomes; AI RMF Profiles for specific settings	Appendix P.1 SMB Quick-Start profile, where appropriate to documented scope

3. What Your NIST AI RMF Work May Provide → Where There Is Clear Conceptual Correspondence → Where GAISSF™ May Add Depth

What your existing NIST AI RMF work may provide

Existing NIST AI RMF implementation may provide relevant risk-management processes, context-mapping work under Map, governance and accountability practices under Govern, measurement activities, and associated documentation. The extent to which these support GAISSF™ requirements must be verified for the system and scope being examined.

Where there is clear conceptual correspondence

GAISSF™ D6 (Governance, Accountability & Human Oversight) and NIST AI RMF's Govern function both address governance, accountability, policy, and oversight concerns. Aspects of NIST's Map function relate conceptually to GAISSF™'s scoping and applicability approach. These relationships are directional and do not establish one-to-one control equivalence — correspondence at the category/subcategory-to-control level requires a formal crosswalk.

Where GAISSF™ may add depth

- GAISSF™ organizes model integrity, runtime security, agentic risk, and AI supply-chain security into dedicated control domains (D1–D4). NIST AI RMF addresses related risk-management outcomes across its functions and supporting Playbook; a formal crosswalk is required to determine the degree of coverage for any specific GAISSF™ control.
- GAISSF™ links its control architecture to identifiable implementation evidence and assurance expectations. NIST AI RMF also emphasizes documentation, measurement, and evaluation, but structures these around risk-management outcomes rather than a fixed control catalogue.
- Appendix P.1 SMB Quick-Start, a defined GAISSF™ conformance-profile entry point, where applicable — distinct from, and not directly equivalent to, NIST's AI RMF Profiles.

KEY PRINCIPLE

Assurance is demonstrated, not asserted. A control claim is only as credible as the evidence supporting its implementation and operation. GAISSF™ applies that principle through a control-and-evidence architecture that can complement an organization's existing NIST AI RMF risk-management practices.

4. Areas to Examine in a Formal Crosswalk

A formal crosswalk should examine, rather than assume, the degree to which existing NIST AI RMF practices support GAISSF™ requirements. The examination should include, where applicable: control-level technical evidence; model and runtime security; agentic-system controls; AI supply-chain controls; and the traceability of implementation evidence to specific GAISSF™ requirements.

5. Recommended Next Action

1. Identify one AI system already managed using NIST AI RMF.
2. Document which AI RMF functions, categories, and subcategories are actively implemented for that system.

- 3. Determine the appropriate GAISSF™ scope or profile independently, using GAISSF™ scoping rules.
- 4. Compare existing NIST-derived practices and evidence against the applicable GAISSF™ requirements.
- 5. Record supported correspondence, partial correspondence, gaps, and unknowns — rather than assuming equivalence.
- 6. Use the eventual formal GAISSF™–NIST AI RMF crosswalk when available.

NOTABLY ABSENT

This guide does not establish control equivalence, coverage percentage, conformance inheritance, regulatory equivalence, or certification credit between NIST AI RMF and GAISSF™. It is not a control-by-control crosswalk or formal assessment methodology. Any claimed correspondence must be verified at the applicable NIST category/subcategory and GAISSF™ control level.

The Relationship at a Glance

- NIST AI RMF — Govern · Map · Measure · Manage → risk-management outcomes, actions, documentation, measurement, and TEVV.
- GAISSF™ — applicable domain/control scope → control requirements, implementation evidence, and assurance expectations.

Correspondence between the two must be established at the category/subcategory-to-control level — it is tested, not declared.

Next Reading

- The 10-Minute Introduction to GAISSF™
- GAISSF™ Appendix P.1 SMB Quick-Start Guide
- Mapping GAISSF to ISO/IEC 42001
- Mapping GAISSF to SOC 2

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