

Federal Brief — Cross-Vendor Governance for Agentic Payments

MNNR LLC · TOHID NAEEM, Founder · 2026-06-08

For: GSA · DoD · DIU · AFWERX · VA · GSA TTS · Treasury · Federal Program Managers · Contracting Officers

Executive Summary

NSPM-11, signed 2026-06-05, puts national-security guardrails on every federal agentic AI deployment. mnnr is the cross-vendor governance layer that lets your program ship agents without rebuilding compliance from scratch.

Problem. Two changes inside seven days reset the federal agentic-payment landscape. **National Security Presidential Memorandum 11 (NSPM-11)** was signed 2026-06-05 establishing agentic-AI national-security guardrails for federal deployers. In parallel, the commercial agentic-payment rails consolidated — Visa Agentic Ready, Mastercard Agent Suite, Stripe Link for Agents, PayPal x Hey Savi, Crossmint Agentic Cards, AWS Bedrock AgentCore Payments, Google Universal Commerce Protocol — each picking different network postures. Federal programs are now obligated to deploy agentic capabilities under NSPM-11 guardrails on top of whichever commercial rail the procurement vehicle delivered.

The unresolved layer is cross-vendor governance. NSPM-11 disfavors single-vendor lock-in on the audit layer. The audit trail must be portable across vendor changes. The cryptography must be on the **CNSA 2.0** post-quantum trajectory. The mandate boundary must be enforceable and reportable. The fallback to human-in-the-loop must be testable. No commercial rail ships this layer cross-vendor by design — each ships its own native audit trail tied to its own rail.

Solution. mnnr is a rail-neutral, policy-opinionated governance layer above whatever commercial rail your program selected. Three pillars: cross-vendor mandate enforcement and NSPM-11 audit overlay; policy-portable controls aligned to Treasury / OCC / FDIC posture; post-quantum signed audit on the NIST FIPS 203 / FIPS 204 standards and CNSA 2.0 trajectory.

Pilot. USD 5,000 / month, 90 days, white-glove. SDVOSB-track entity. Direct founder access to TOHID NAEEM (decorated disabled veteran, 100% service-connected). Deliverables include cross-vendor audit overlay, post-quantum signed event log, mandate-scope enforcement, human-in-the-loop fallback integration, and a documented NSPM-11 §3 cross-vendor audit posture suitable for program supervisory review.

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1. NSPM-11 plain English

National Security Presidential Memorandum 11 (NSPM-11) was signed 2026-06-05 (whitehouse.gov primary). It establishes national-security guardrails for the deployment of agentic AI systems by U.S. federal agencies. The plain-English read for a federal agentic-payment program manager or contracting officer:

1.1 Scope

NSPM-11 covers agentic AI systems procured by, deployed by, or operated on behalf of federal departments and agencies. Agentic AI is treated as AI that takes actions in the world — including financial actions — under a defined mandate. The memorandum is not limited to defense or intelligence community deployments; the obligations attach wherever federal funds, federal data, or federal payment instruments touch the agent.

1.2 Agency obligations (operational reading)

- **Mandate scoping.** Every agentic deployment must operate within a **cryptographically bound mandate boundary**. The mandate must specify scope, counterparty constraints, dollar thresholds, frequency, geography, and expiry. Out-of-mandate action is a reportable event for the deploying agency.
- **Cross-vendor auditability.** Federal deployers must maintain audit trails that are **portable across vendor changes**. The memorandum explicitly disfavors single-vendor lock-in on the audit layer. Where a commercial rail's native audit format does not export cleanly to a cross-vendor format, the deployer is responsible for the overlay.
- **Post-quantum migration alignment.** Agentic-system cryptography must be on the **CNSA 2.0** trajectory. For critical national-security functions, ML-KEM and ML-DSA (or equivalents on the CNSA 2.0 advisory list) are the day-one defaults. Classical-only deployments are time-limited.
- **Human-in-the-loop fallback.** Every agentic financial action must have a **human-approval fallback path** that is documented, tested, and exercisable on demand by the supervisory program manager.
- **Supply-chain transparency.** Vendors supplying agentic capabilities to federal deployers must disclose **model provenance, training-data lineage, and policy-enforcement architecture** to the deploying agency at procurement and on material change.

1.3 AI safety and national-security guardrails

NSPM-11 inherits the AI safety posture established under prior administration-level AI directives and tightens the national-security-specific obligations for agentic deployments. The operative posture: agentic capability is a force multiplier, and the supervisory layer must scale with it — not lag it.

1.4 Applicability to procured AI systems

NSPM-11 reaches procurement. A federal program that procures an agentic AI system inherits the agency obligations under §1.2 above. The vendor's contractual deliverables must allow the deploying agency to satisfy those obligations. Where the vendor's native architecture does not — for instance, where the rail's audit trail is single-vendor and non-portable — the deploying agency or a

governance-layer vendor must supply the overlay.

That overlay is the layer mnnr supplies.

2. Federal agentic-payments landscape

2.1 GSA SmartPay and agentic AI procurement signals

The GSA SmartPay program is the U.S. federal government's purchase-, travel-, and fleet-card payments framework. As agentic procurement expands inside civilian agencies, SmartPay-adjacent vehicles will see agentic-actor flows initiated against federal payment instruments. The supervisory question — who attested that the agent was authorized to make this purchase, against this mandate, with this card — is the question mnnr's pillar 1 answers.

2.2 DoD DIU agentic AI pilots

The Defense Innovation Unit (DIU) has stood up commercial-agentic-AI prototyping vehicles inside the DoD acquisition ecosystem. DIU's posture is "rapid prototyping at commercial speed under defense rigor." Agentic payment capability inside a DIU prototype inherits NSPM-11 obligations; the deployer needs a governance layer that fits a DIU prototype timeline, not an enterprise rollout timeline.

2.3 VA Office of Information and Technology (OI&T) modernization

The Department of Veterans Affairs Office of Information and Technology runs the modernization stack for VA's IT estate. Agentic capability inside the VA estate touches **veteran data** and **veteran-facing financial flows** — Veteran Readiness and Employment payments, Caregiver Support Program disbursements, Compensation and Pension, and others. The supervisory bar is high; the audit-trail bar is higher. VA OI&T procurement carries a **veteran-owned-business preference**; SDVOSB set-aside vehicles are routine.

2.4 AFWERX 26.1 cycle

AFWERX is the Air Force innovation arm running the SBIR / STTR Phase I-II-III cycle for Air Force adjacent technology. The 26.1 solicitation cycle window is the current cycle as of 2026-06-08. AFWERX 26.1 includes agentic-payments-adjacent topic areas around autonomous logistics, supply-chain financial coordination, and contracting officer support tooling. SDVOSB primes are scoring eligible.

2.5 Treasury — OCC and FDIC posture

The Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) supervise national banks and insured depositories — many of which are the issuing banks behind the federal payment rails. Both regulators have surfaced agentic-banking attention in 2026 supervisory publications. The cross-vendor governance layer satisfies the supervisory chain from the federal deploying agency through the issuing bank to the network rail.

2.6 FedRAMP for AI / agentic vendors

The Federal Risk and Authorization Management Program (FedRAMP) is the standardized cloud security authorization for federal vendors. FedRAMP **Moderate** is the typical baseline; **High** is required for higher-impact systems. mnr's FedRAMP path is in scoping with Moderate as the first target; High follows the design-partner cohort under a federal sponsor.

3. The mnr governance stack

3.1 Three pillars, federal framing

mnr's three pillars apply unchanged from the EU governance posture; the federal framing differs in audit-export destination, accreditation path, and procurement vehicle.

Pillar 1 — Cross-vendor mandate enforcement and NSPM-11 audit overlay. Mandate scoping (counterparty, amount, frequency, geography, expiry), cryptographic binding of mandate to every transaction, out-of-mandate event flagging, human-in-the-loop fallback hooks, supply-chain transparency documentation surface. Audit-overlay export is portable across whichever commercial rail the program selected — Visa Agentive Ready, Mastercard Agent Suite, Stripe Link for Agents, PayPal Hey Savi, Crossmint Agentive Cards, AgentCore Payments, UCP.

Pillar 2 — Policy-portable controls. Treasury-, OCC-, FDIC-aligned controls overlay for federal agentic flows touching the U.S. banking system. Includes AML/CFT signal surfaces, anomalous-counterparty detection hooks, dispute-evidence packets in the format the rail's dispute pipeline consumes.

Pillar 3 — Post-quantum + bank-grade audit on the CNSA 2.0 trajectory. ML-KEM-768 (NIST FIPS 203, August 2024) for transport; ML-DSA (NIST FIPS 204, August 2024) for signatures. Audit log is append-only, content-addressed, signed end-to-end. Export adapters for Treasury supervisory consumption, OCC examination workflows, FDIC IT exam workpapers, and standard federal data-warehouse destinations.

3.2 Cross-vendor avoids commercial-rail lock-in

The commercial agentic-payment rails picked by GSA, DoD, VA, AFWERX, and similar programs vary by procurement vehicle and program. Some are on Stripe. Some are on Visa Agentive Ready via their issuing bank. Some are on AWS Bedrock AgentCore Payments via their cloud contract. Some will be on Crossmint, on Mastercard Agent Suite, or on Google UCP-endorsing PSPs.

NSPM-11 §1.2 (cross-vendor auditability) makes it operationally untenable for a federal deployer to accept an audit trail that lives inside any one of those rails. The audit trail must be portable across vendor changes — the policy enforcement and the verifiable record must sit **above** the rail, not inside it.

mnr is the policy layer above all of them. The program keeps whatever commercial rail it has already selected; mnr supplies the cross-vendor governance NSPM-11 requires. When a future program migrates from one rail to another, the audit history migrates with the program — not with the prior rail.

3.3 Post-quantum positioning ties to CNSA 2.0

For federal agentic-payment audit trails — which must remain cryptographically verifiable for ten years or longer under standard federal records-retention obligations — building on classical RSA or ECDSA today is the riskier decision. The NSA's CNSA 2.0 advisory sets the migration trajectory; mnnr's audit layer is post-quantum by default, NIST-standardized, and CNSA 2.0-aligned. No retrofit required by the deploying agency.

3.4 Integration surface

- **REST API** — primary integration. OpenAPI 3.1 specification. Idempotency keys aligned to mandate identifiers.
- **Webhooks** — signed event delivery (ML-DSA signatures) for mandate lifecycle, dispute lifecycle, supervisory-export events.
- **SDKs** — TypeScript and Python ship first; Java and Go in the design-partner cohort backlog. Federal design partners integrate REST-first.
- **Rail adapters** — Visa Agentic Ready, Mastercard Agent Suite, Stripe Link for Agents, PayPal Hey Savi, Crossmint Agentic Cards, AgentCore Payments, UCP. Adapter coverage is staged across the design-partner cohort.
- **Supervisory export adapters** — Treasury supervisory format, OCC examination workpaper format, FDIC IT exam workpaper format, FedRAMP continuous-monitoring feed.

4. SDVOSB and SBIR positioning

4.1 Tier-1 federal targets for the design-partner cohort

- **VA Office of Information and Technology (OI&T)** — agentic-payment governance touching veteran-facing financial flows; SDVOSB preference applies; VA T4NG2 task-order vehicle is a procurement path.
- **GSA Technology Transformation Services (TTS)** — civilian-agency agentic-AI policy-layer pilots; 18F engagement model is a procurement path.
- **DoD Defense Innovation Unit (DIU)** — commercial-agentic-AI prototyping vehicles; CSO (Commercial Solutions Opening) is a typical entry path.
- **AFWERX 26.1 cycle** — agentic-payments-adjacent SBIR/STTR topic areas; Phase I → Phase II → Phase III progression with sole-source Phase III as the target.
- **Treasury, OCC, FDIC** — supervisory-tooling adjacency where the supervisor itself is the buyer for cross-vendor governance evidence intake.

4.2 Set-aside opportunities for SDVOSB

The Service-Disabled Veteran-Owned Small Business program (SDVOSB) carries a federal-wide set-aside preference under 13 CFR Part 128 and FAR Subpart 19.14. Veterans Affairs operates the most aggressive SDVOSB preference under the Vets First Contracting Program (38 U.S.C. § 8127). MNNR LLC, founded by TOHID NAEEM (decorated disabled veteran, 100% service-connected), is on

the SDVOSB certification path; design-partner engagements precede formal certification but are structured to convert cleanly into SDVOSB set-aside vehicles as certification completes.

4.3 SBIR Phase I / II / III alignment

The Small Business Innovation Research (SBIR) program supports Phase I feasibility (typical six months, six-figure award), Phase II prototyping (typical two years, seven-figure award), and Phase III commercialization (no SBIR funding ceiling; sole-source authority for follow-on contracts derived from Phase I/II). mnnr's federal posture is to enter the SBIR pipeline at AFWERX 26.1 (Phase I) and at DIU CSO (parallel path), then mature to Phase III commercialization across multiple agencies via the cross-vendor governance value proposition.

5. Procurement vehicle reference

The procurement vehicle determines the contracting officer's authorities, the small-business set-aside path, and the timeline. The most relevant vehicles for an mnnr federal pilot:

5.1 GSA Multiple Award Schedule (MAS) — IT Category

The GSA MAS IT Category (formerly Schedule 70) is the workhorse civilian-agency IT procurement vehicle. SINs (Special Item Numbers) relevant to mnnr include 54151S (IT Professional Services), 54151HACS (Highly Adaptive Cybersecurity Services), and SIN 518210C (Cloud Computing). A GSA MAS holding is a pre-priced, pre-competed shortcut for ordering activities; the path to schedule listing for MNNR LLC is sequenced after the design-partner cohort matures the production pricing band.

5.2 SBIR Phase I, II, III

The Small Business Innovation Research program is a federal R&D set-aside. Phase I funds feasibility (typically six months, sub-USD 300,000). Phase II funds prototype development (typically two years, sub-USD 2,000,000). Phase III funds commercialization with **no SBIR funding ceiling and sole-source authority** for follow-on contracts that derive from Phase I/II work. The Phase III sole-source authority is the structural lever mnnr's federal pipeline anchors on — a Phase I AFWERX engagement that matures to Phase III sole-source procurement across multiple agencies is the canonical path.

5.3 Other Transaction Authority (OTA)

OTAs are non-FAR contracting vehicles available to specific agencies (DoD, DHS, DoT, NASA, others). They allow rapid prototyping at commercial speed and accept commercial accounting practices. DoD DIU's Commercial Solutions Opening (CSO) is the most commonly used OTA on-ramp for commercial agentic-AI vendors. An OTA prototype that succeeds at scope can transition to a follow-on production OTA without re-competing.

5.4 Cooperative Research and Development Agreement (CRADA)

CRADAs are partnership instruments between federal laboratories or FFRDCs and non-federal parties. Useful where the deploying agency wants joint development with a lab partner (for instance, an FFRDC

with deep expertise in supervisory tooling for federal banking flows). No funds flow from the federal partner to the non-federal party under a CRADA; the value exchange is in shared development, access to facilities, and co-published technical artifacts.

5.5 VA T4NG2 task-order vehicle

The Department of Veterans Affairs Transformation Twenty-One Total Technology Next Generation 2 (T4NG2) is VA's primary IDIQ for IT services. SDVOSB primes are prominently represented in T4NG2 awards. A pilot delivered under a T4NG2 task order is the cleanest path into the VA estate for an SDVOSB vendor.

5.6 GSA Polaris (GWAC)

Polaris is the GSA Governmentwide Acquisition Contract for IT services with small-business set-aside pools (SDVOSB, WOSB, HUBZone, 8(a)). Polaris is multi-agency by design; a prime contract holding allows direct task-order work for any federal customer.

6. Pilot structure for federal contracting officers

- **USD 5,000 / month** for a 90-day federal pilot. Direct founder access to TOHID NAEEM throughout.
- **Vehicles.** Time-and-materials with not-to-exceed cap; Other Transaction Agreements (OTAs) where the agency has OT authority; Cooperative Research and Development Agreements (CRADAs) for FFRDC- or lab-led pilots; SBIR Phase I or II contracts where the topic area aligns.
- **Onboarding milestones:**
 - Week 1 — discovery: agency, program, commercial rail in use, supervisory chain, NSPM-11 obligation map.
 - Weeks 2–3 — integration build against the rail adapter for the program's chosen commercial rail.
 - Week 4 — mandate-scope enforcement configuration; human-in-the-loop fallback wiring.
 - Weeks 5–6 — post-quantum signed audit export wired to the agency's data destination.
 - Weeks 7–8 — supervisory dry-run with the program's compliance and security functions.
 - Weeks 9–10 — NSPM-11 §1.2 cross-vendor audit documentation package.
 - Weeks 11–12 — production hardening, run-book delivery, hand-off.
- **Success metrics:**
 - NSPM-11 §1.2 cross-vendor audit coverage on agent-initiated federal transactions (target: 100% in scope).
 - Mandate-scope enforcement false-positive rate (target: under 1% at steady state).
 - Audit-log supervisory-query latency (target: under 5 seconds typical; under 60 seconds full export).
 - Human-in-the-loop fallback exercisability — demonstrated end-to-end in dry-run.
- **Pricing roadmap post-pilot.** Production pricing is volume-banded; federal design-partner cohorts receive a published discount on the first 12 months of production usage and structured conversion

into SDVOSB set-aside vehicles as certification completes.

To engage federal pilots: write directly to **design-partners@mnnr.app** with program identification and procurement vehicle in scope.

7. About MNNR LLC

- **Entity.** MNNR LLC, Wyoming domestic LLC, EIN 33-3678186, formed 2025-02-26. Operating from Silicon Hills, California.
- **Founder.** TOHID NAEEM. Decorated disabled veteran of the United States armed forces (100% service-connected disability rating). Background spans federal IT modernization, regulatory technology, and payments infrastructure.
- **NAICS coverage.** 541511 (Custom Computer Programming Services), 541512 (Computer Systems Design), 541519 (Other Computer-Related Services), 541690 (Other Scientific and Technical Consulting Services).
- **Regulatory posture.** SDVOSB registration in progress under MNNR LLC; SAM.gov registration in progress. SOC 2 Type I path in scoping. FedRAMP Moderate path in scoping with High as the follow-on target. GDPR + EU AI Act readiness for cross-Atlantic deployments.
- **IP.** 100% owned by MNNR LLC. No founder-side encumbrance.
- **Contact.** hello@mnnr.app · design-partners@mnnr.app · mnnr.app.

Sources

[1] National Security Presidential Memorandum 11 (NSPM-11), signed 2026-06-05. Primary source: [whitehouse.gov](https://www.whitehouse.gov). [2] U.S. National Security Agency, Commercial National Security Algorithm Suite 2.0 (CNSA 2.0) advisory. [3] NIST FIPS 203 — Module-Lattice-Based Key-Encapsulation Mechanism Standard (ML-KEM), August 2024. [4] NIST FIPS 204 — Module-Lattice-Based Digital Signature Standard (ML-DSA), August 2024. [5] 13 CFR Part 128 — Service-Disabled Veteran-Owned Small Business Concern Program. [6] FAR Subpart 19.14 — Service-Disabled Veteran-Owned Small Business Procurement Program. [7] 38 U.S.C. § 8127 — Veterans Affairs Vets First Contracting Program. [8] FedRAMP — Federal Risk and Authorization Management Program; Moderate and High baselines. [9] GSA SmartPay program documentation. [10] DoD Defense Innovation Unit, Commercial Solutions Opening (CSO) framework. [11] AFWERX SBIR / STTR 26.1 solicitation cycle. [12] Money20/20 Europe (Amsterdam, 2026-06-03 to 2026-06-05) press releases — agentic-payment rail consolidation.

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