PARTNERSHIP
FOR PUBLIC SERVICE

January 17, 2024

The Honorable Nancy Mace
Chairwoman
Subcommittee on Cybersecurity, Information Technology, and Government Innovation
House Committee on Oversight and Accountability
2157 Rayburn House Office Building
Washington, DC 20515

The Honorable Gerry Connolly
Ranking Member
Subcommittee on Cybersecurity, Information Technology, and Government Innovation
House Committee on Oversight and Accountability
2105 Rayburn House Office Building
Washington, DC 20515

Dear Chairwoman Mace and Ranking Member Connolly:

On behalf of the Partnership for Public Service, a nonpartisan, nonprofit organization dedicated to better government and stronger democracy, I am writing to submit this letter for the record in connection with the Cybersecurity, Information Technology, and Government Innovation Subcommittee's hearing "Toward an AI-Ready Workforce."

Thank you for the opportunity to share our perspective on building an AI-ready workforce. As you know through the hearings you've been conducting on AI, it is a powerful tool that federal agencies can and should leverage to make their work more efficient and improve customer service. However, there is much baseline work to be done – both to establish internal frameworks and processes needed to utilize AI (governance structures, data sharing, privacy, risk management) as well as to ensure that agencies have the right skills throughout the workforce to assess and deploy AI tools. We encourage the subcommittee to consider the following areas of focus to build an AI-ready workforce to deploy and scale federal AI applications.

## Recruiting and hiring top talent

In order to leverage AI across agencies, it is necessary to have both the technical talent to deploy AI and also ensure that all employees understand the basics of working with AI. The following are recommendations to assist Congress and agencies in preparing for the federal government's AI hiring journey. These recommendations combine hiring tools, best practices and congressional action to help build the AI workforce. Federal AI will be dependent on the human capital behind it, so Congress and agencies should focus on the necessary talent capacity from the start.

### Expand skills-based hiring to identify qualified talent

Congress and the federal government should expand the use of skills-based hiring. Unnecessary degree requirements can create barriers for job seekers, particularly in technology-focused occupations. Progress has been made on this front in recent years (e.g., the 2020 Executive Order 13932 on Modernizing and Reforming the Assessment and Hiring of Federal Job Candidates emphasizing skills over degree requirements)[i] but government can still strengthen its talent pipelines for jobs that do not require a four-year degree—such as those in IT, cyber and AI—by demystifying the hiring process, using rigorous technical assessments to identify qualified talent, building relationships with community colleges and workforce development organizations and removing barriers to professional development and

advancement. Doing so would benefit federal agencies by connecting them with potential applicants who too often are overlooked and talent within underserved communities.[ii]

**Develop easier-to-understand position descriptions and make them shareable government-wide**

Rather than using antiquated job titles and descriptions heavy on government vernacular, agencies should use titles comparable with industry and modernize position descriptions to clearly outline expected responsibilities. The Office of Personnel Management (OPM) issued guidance on the skills and competencies needed for federal AI positions in July 2023,[iii] offering a list of general and technical competencies that can serve as a starting point for agency job analysis efforts. To help agencies effectively recruit tech and AI talent, it would be useful to require OPM, in coordination with the CHCO Council, to develop a set of common job titles and position descriptions, make those shareable government-wide and undertake pooled hiring actions for those roles.

**Support HR capacity for an AI hiring surge**

We recommend that Congress fully fund and support agency hiring efforts, with specific attention given to bolstering agency HR offices so they have the capacity to take on an AI hiring surge. There are a host of positions needed to deploy AI applications, including not just technologists, but data analysts, data scientists and other enabling roles. This talent must be recruited, assessed and onboarded in rapid succession for the federal government to reach its AI goals. Recruiting the vast talent needed for these positions will be spearheaded by agency HR offices, but they need the capacity to do so. Congress can support this effort by fully funding agency HR offices and working with OPM and agencies to ensure they have the resources in hand to successfully hire AI talent.

**Utilize surge hiring best practices and available hiring flexibilities**

To accomplish the called-for AI talent surge and make government competitive for top talent, there needs to be a government-wide recruitment effort bolstered by streamlined hiring processes and use of best practices. The hiring surge should include the use of candidate assessments, pooled hiring efforts, shared position descriptions and other hiring flexibilities. OPM has already issued information on AI competencies[iv] and streamlined some hiring processes[v] to assist in talent surge efforts, but agencies need more guidance at the hiring manager level to make this work. We urge Congress and agencies to carefully craft a hiring surge plan that incorporates best practices learned from recent talent buildups as detailed in our “Rapid Reinforcements” report.[vi]

**Encourage and update recruitment incentives**

On November 15, 2023, OPM proposed the Recruitment and Relocation Incentive Waivers rule[vii] to authorize recruitment incentives for up to 50% of annual basic pay per year to fill critical agency needs. When finalized, agencies should use this new authority to help compete against the private sector for AI workforce talent. However, agencies could more effectively use recruitment incentives if Congress amended the law to allow for occupation-specific payments based on market conditions for similar positions in the private sector. Congress should encourage the use of recruitment incentives to compete for AI talent, authorize occupation-based payments and instruct agencies to streamline their incentive initiation and approval processes so they can be used quickly to provide competitive offers.

**Update the federal pay system**

As we lean into emerging fields like AI, the federal government must urgently update its antiquated pay system. The government's 1949 pay and classification system was designed for clerical workers, not today's highly professional, specialized civil service. To meet today's hiring and retention needs, Congress should create a modern, occupation-based, market-sensitive pay system. While the government, in most cases, will not be able to match private sector salaries, it will be better positioned to fill critical skill gaps in AI under a system that allows agencies more flexibility in setting pay and by establishing standard job series for roles in these fields.

**Use workplace flexibility as a recruitment tool**

The pandemic forced a reimagining of work across all sectors and industries. Employees, particularly in the tech field, demanded greater flexibility and employers offered ample hybrid and remote opportunities in response. To recruit and retain top talent, the government must think strategically about how to infuse such flexibility into federal roles, track data on productivity and provide training to managers who oversee remote workers, as suggested in Representative Gerald Connolly's 2022 bill, the Telework Metrics and Cost Savings Act.[viii] Another example of a measured approach is the Telework Reform Act introduced last year by Senators Lankford and Sinema,[ix] which would update the 2010 telework law to codify the definition of telework and add a definition for remote work. This may be a potential starting point for continued discussions on hybrid and remote work in the federal government.

## Developing an AI ready workforce

While all employees will eventually need basic training on the use of AI tools to help them better understand appropriate AI use cases, separate subcategories of employees will need training on procurement, risk assessment, bias and privacy. Agencies in turn will need leaders capable of overseeing these efforts. Specific focus on training and leadership development, along with resourcing these efforts in a budget-constrained environment, will be crucial to more robust scaling of AI tools. The Partnership offers the following recommendations on developing the federal government's AI workforce.

**Train employees to understand AI**

Whether agencies are building their own AI systems or acquiring them from outside vendors, they should ensure that federal employees have sufficient expertise to evaluate and operate them. Agencies should also explore ways to develop technical and non-technical staff capacity to understand the risks, benefits and implications of using AI for service delivery. Some current efforts recognize this need and aim to assist agencies in developing expertise, such as the AI Training Act signed into law in October 2022,[x] which charges OMB with developing a training program to help acquisition professionals better understand AI and its potential risks and benefits. Congress should work with OMB to evaluate the effectiveness of the program and consider whether this framework can be applied to other training opportunities.

**Empower, train and develop modern government leaders**

Leaders across government, from every discipline and practice, should apply modern ways of working to their programs and organizations. It is critical that agency leadership be prepared to respond to the ongoing evolution of AI and its broad impacts, along with other emerging technologies and tools. To this end, the federal government should invest in hiring and training government leaders who integrate modern ways of working into their organizations. We recommend that Congress work with OMB, OPM

and agencies to update Executive Core Qualifications (ECQs) with AI, technology and modern leadership in mind. We need federal leaders equipped to lead AI decision-making effectively and responsibly. Regardless of their technical background, leaders should make a concerted effort to learn new technologies and see how they can be used in service to the public. Responsibly evaluating, implementing and using AI requires successful collaboration between technical and non-technical leaders. The data scientists building AI tools, the Chief AI Officers (CAIOs) or Chief Information Officers (CIOs) operating them, the general counsels reviewing their privacy implications, the program managers interpreting their results and many others must all collaborate to ensure responsible use of AI.

**Developing the framework and internal processes necessary to AI deployment**

An AI-ready workforce is an important component of building AI capacity across government. But the workforce alone isn't sufficient for successful deployment and scaling of AI tools. More foundational work on governance, data sharing and customer experience is necessary, as well as encouraging OPM and OMB to provide additional guidance to agencies so that they have a consistent framework to benchmark against.

**Enable data-sharing to allow AI to work across agencies**

The executive branch and Congress must enable agencies to share common customer data in a secure environment in the data-driven AI age. This demands a new approach to customer data that prioritizes enterprise solutions, not temporary workarounds.

Some agencies have made strides in adopting best practices, including the Small Business Administration (SBA), the Federal Emergency Management Agency (FEMA) and the Department of Housing and Urban Development (HUD), which coordinate to provide disaster assistance. But more often than not, agencies face barriers in sharing data across and within agencies. Overcoming these challenges will require strategic planning and enterprise data-sharing agreements.

We recommend the following actions:

- Agencies should invest in application program interfaces or APIs—software that enables two computer programs to communicate–or other emerging technology tools that enable secure data verification.
- Agencies should explore and, where feasible, implement cloud storage and computing solutions to make their data more secure, manageable and usable. The interoperability and computing power of modern cloud solutions are critical to leveraging the value of government data and expanding the government's capacity to train and operationalize AI.
- The federal government should work with entities like the Chief Data Officers Council and the Federal Privacy Council to establish government-wide approaches for research and data protection laws and regulations relevant to customer experience missions, such as the Privacy Act. They should also create standard parameters for conducting customer research, collecting customer feedback and data and research compensation.
- OMB and other federal agencies should conduct an audit of customer experience data collection, data protection and data-sharing statutes and regulations, building on recent life experience projects to understand where these policies prevent seamless and secure customer experiences.[xi] With these findings, they should seek regulatory or congressional support as needed.

- Federal agencies should explore proposals to give customers the opportunity to opt in or out of allowing agencies to share their data across programs or agencies, or explore pursuing an "ask once" goal for data collection, subject to legal requirements.
- When integrating AI into their operations, agencies must first ensure that data inputs are accessible, high-quality and machine-readable. Agencies should define and maintain internal data standards to ensure readiness for AI applications. Most importantly, agencies should maintain and communicate data in non-PDF formats. Wherever possible, agencies working with similar data should align their standards to increase the value of each data set and reduce duplicative work.

Finally, in customer experience and service delivery applications, personally identifiable information (PII) can be used to customize AI systems, optimizing them for the individual needs. However, these opportunities come with a host of privacy-related risks. Congress and agencies must address these harms with robust data governance policies and powerful privacy-enhancing technologies (PETs). To save time, reduce costs, and protect customers, we recommend agencies audit their data intake practices and align them with modern best practices for data minimization. Additionally, agencies should publicly define permitted uses for PII and provide a simple and prompt means for customers to delete, change or control access to their information. To prevent malicious use of PII, agencies should prioritize security in the design of their data infrastructure and adopt cutting-edge PETs. Combining architectures like Zero-Trust with technologies like Secure Multi-Party Computing creates overlapping protections against unauthorized access and extraction. These recommendations simultaneously promote individual liberty and personal privacy for the customer and responsible stewardship by the government.

**Developing an AI governance framework and synergy with customer experience work**

AI represents an opportunity to fundamentally alter the way the public interacts with the federal government from a customer experience (CX) perspective. Given this, AI and CX roles cannot operate in silos – simply designating a "chief" only scratches the surface of the cross-organizational leadership necessary to meet this moment head on. Ultimately, if a person in a chief customer experience, AI, data, or information officer position or related role isn't empowered to lead and work collaboratively across the enterprise, there will be little progress on these issues. A recent survey of federal chief data officers (CDOs) reflected this inconsistency, with respondents indicating that CDO functions are organized differently across agencies.[xii] For example, 33% of CDOs said they report to chief information officers, 15% report to agency heads and 52% wrote in a variety of other reporting structures (such as reporting to the COO, CFO or other positions).

Agencies should have the ability to assess the optimal reporting structure for their mission, but we recommend that AI and CX roles not be dual-hatted with other chief roles unless the person has specific leadership skills applicable to the position or has a technical deputy that can serve as the link between senior leaders and the AI or CX workforce. Additionally, we question whether some of the positions require a "chief" role, or should rather be embedded across existing data, IT, cyber and program offices that all play parts in enabling any emerging technology such as AI. Regardless of where these positions sit on the organizational chart, it is crucial to ensure that the people in these roles have the requisite skills and accountability mechanisms to enable successful AI adoption and thoughtful, human-centered design CX efforts.

Utilizing existing governance structures, such as IT governance boards, can be instrumental in this

regard. These boards bring together various actors and stakeholders, fostering a collaborative environment that breaks down silos and promotes good governance. This integrated approach ensures a more cohesive and effective strategy in implementing AI and CX initiatives, leveraging diverse expertise and perspectives for holistic solutions.

**Conclusion**

We appreciate the subcommittee's attention to this important issue and your efforts to foster an AI-ready workforce. The Partnership looks forward to supporting the subcommittee's efforts and working together on this important issue in the future. We would be happy to provide additional briefings for members and committee staff about AI in government based on our work with federal agencies. Please let us know if you have any questions or would like to discuss these matters in the future.

Sincerely,

Max Stier
President and CEO
Partnership for Public Service

---

[i] Executive Order 13932 "Modernizing and Reforming the Assessment and Hiring of Federal Job Candidates," June 26, 2020, https://www.federalregister.gov/documents/2020/07/01/2020-14337/modernizing-and-reforming-the-assessment-and-hiring-of-federal-job-candidates

[ii] "Opening Doors, Building Ladders: How Federal Agencies Can Hire and Retain Californians Who Do Not Have a Four-year Degree," Partnership for Public Service, February 2021, https://ourpublicservice.org/wp-content/uploads/2021/02/Opening-Doors-Building-Ladders.pdf

[iii] "The AI in Government Act of 2020 – Artificial Intelligence Competencies," Office of Personnel Management, July 2023, https://chcoc.gov/content/ai-government-act-2020-%E2%80%93-artificial-intelligence-competencies

[iv] "The AI in Government Act of 2020 – Artificial Intelligence Competencies," Office of Personnel Management, July 2023, https://www.chcoc.gov/content/ai-government-act-2020-%E2%80%93-artificial-intelligence-competencies

[v] "Government-wide Hiring Authorities for Advancing Federal Government Use of Artificial Intelligence (AI)," Office of Personnel Management, December 2023, https://www.chcoc.gov/content/government-wide-hiring-authorities-advancing-federal-government-use-artificial-intelligence

[vi] "Rapid Reinforcements: Strategies for Federal Surge Hiring," Partnership for Public Service, October 2020, https://ourpublicservice.org/wp-content/uploads/2020/10/Rapid_Reinforcements_2.pdf

[vii] "Recruitment and Relocation Incentive Waivers," Federal Register, November 2023, https://www.federalregister.gov/documents/2023/11/15/2023-25199/recruitment-and-relocation-incentive-waivers

[viii] "H.R. 7951 – Telework Metrics and Cost Savings Act," Congress.gov, https://www.congress.gov/bill/117th-congress/house-bill/7951/text?s=4&r=5

[ix] "S.3015 - Telework Reform Act of 2023," Congress.gov, https://www.congress.gov/bill/118th-congress/senate-bill/3015

[x] "S.2551 - AI Training Act," Congress.gov, https://www.congress.gov/bill/117th-congress/senate-bill/2551

[xi] "Government-wide CX Efforts," Presidential Management Agenda, https://www.performance.gov/cx/projects/

[xii] "Artificial Intelligence: Agencies Have Begun Implementation but Need to Complete Key Requirements," Government Accountability Office, December 2023, https://www.gao.gov/products/gao-24-105980