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Fast Following = CSO + OTA

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Abstract

Acquisition and technology professionals are rushing to understand the Commercial Solutions Opening (CSO). Forward thinking policy makers have handed us 10 USC 3458: Authority to Acquire Innovative Commercial Products and Commercial Services Using General Solicitation Competitive Procedures; a broadly worded acquisition authority that, if used to its fullest potential, can shift the current contracting paradigm. With this shift in the contracting paradigm comes disruption. With that disruption comes better, faster, and stronger capabilities, and at a lower cost to the taxpayer. The lack of official guidance and data need not scare the acquisition community. In fact, this works in our favor. Having designed and implemented a CSO for innovative technologies utilized by the Joint Artificial Intelligence Center (JAIC) now Chief Digital and Artificial Intelligence Office (CDAO), we aim to demystify the CSO. We will discuss concepts and tactics of the TryAI Commercial Solutions Opening model for rapid, low-cost demonstrations of innovative commercial products. This paper outlines the mechanics of designing and executing a Commercial Solutions Opening that impacts your organization.

Introduction

"Acquiring defense technology is not simply a matter of buying things, it is a matter of creating and sustaining capabilities that keep pace with the threat and maintain our military superiority. Unfortunately, the Department of Defense's acquisition process has become an impediment to our ability to maintain that edge."

—John McCain, former U.S. Senator, and Chairman of the Senate Armed Services Committee.

As members of the Defense department, we are acutely aware of the challenges facing the DoD's technology acquisition process. The acquisition process can be complex and bureaucratic, leading to significant delays and cost overruns. These challenges can hinder our ability to acquire critical technologies on time and within budget, which can impact our combat readiness and ability to maintain our military edge.

One of the primary challenges we face is the inflexibility of the acquisition process. The process can be overly prescriptive, making it difficult for industry to innovate and resulting in over-engineered systems that are expensive to build and maintain. Furthermore, the DoD's reliance on legacy systems and outdated technologies can limit our ability to integrate new systems and expose us to modern threats.

To address these challenges, we are continually exploring ways to improve our technology acquisition process. We are working to reduce bureaucratic hurdles, increase competition among contractors, and adopt more agile development processes. Additionally, we are exploring emerging technologies such as artificial intelligence and machine learning to improve our capabilities and stay ahead of emerging threats.

We understand that improving our technology acquisition process is critical to maintaining our military superiority and keeping our nation safe. By embracing innovation and streamlining the acquisition process, we can ensure that we have the technologies we need to defend our nation, protect our interests, and maintain our position as a global military leader.

Background

*"The first recommendation is to create a cohort of warfighting exercises resourced by innovation funds. The goal should be operationalizing prototypes and validating requirements. **A merit-based selection process such as commercial solutions opening should be used by chief technology officers to allocate component-specific funds of roughly $100 million each**. Congress could create 'boards of advisors' to monitor use of the funds in the year of execution."*

The Department of Defense (DoD) took a risk when it designed and authorized the Commercial Solutions Opening Pilot Program (CSOP) in 2017. The CSO's regulations are a loose set of guidelines that quickly allows acquisition professionals to "learn the rules like a pro, so you can break them like an artist." This is because the rules are straight forward, and easily understandable. Operating as a General Solicitation, like a Broad Agency Announcement, the CSO is new, but feels familiar. It is being used by creative acquisition professionals to solve some of the Department's most difficult problems. It does not yet have an entrenched set of unwritten rules and local business policies that begin to slowly erode its appeal.

Acquisition professionals are complimenting the CSO (solicitation) by executing agreements (contract) under other transaction authority (OTA). Simple, straightforward agreements help bring the CSO's robust market research capability to life. Some say the CSO is the ultimate market research tool. Adding to the CSO's appeal, it allows the Department to turn market research into a contract with minimal additional justification. This concept of merit-based decision making puts the decision power where it should be, in the technologist's hands. The CSO + OTA acquisition model allows acquisition professionals to be trusted advisors and business enablers for our technical counterparts.

This paper describes the TryAI project, its innovations, and its unique acquisition approach in a way that enables other programs to emulate TryAI. After describing the basics of the TryAI CSO and its key concepts, the author will walk through the steps associated with executing this acquisition strategy. The paper then provides recommendations for successful implementation and actions that can be taken to promote low-cost demonstrations of highly innovative technologies.

Innovation Concept

The concept for solving the problem is the design of a Commercial Solutions Opening (CSO) focused specifically on artificial intelligence capabilities. The hypothesis is that a CSO can be paired with Other Transaction Authority (OTA) to facilitate rapid demonstrations of advanced capabilities.

A key feature of this innovation concept is merit-based decision making; a process that involves evaluating proposals and selecting the best solution based on a set of predetermined criteria. In the context of commercial solutions openings (CSO), merit-based decision making is used to evaluate proposals from private companies and select the solution that best meets the government's needs.

The merit-based decision-making process involves evaluating proposals based on a set of predetermined criteria and allows avoidance of time-consuming down selects or source selection panels.

Project Results

Following 24 months of research and implementation, TryAI has proven the CSO + OTA model is well adapted for demonstrations of innovative commercial technologies, to include artificial intelligence and machine learning.

TryAI has seen the most interest in the Data Readiness AI Focus Area. We've concluded that Data Readiness is the most broadly defined focus area, which is likely a contributing factor. It is also indicative of a data centric focus.
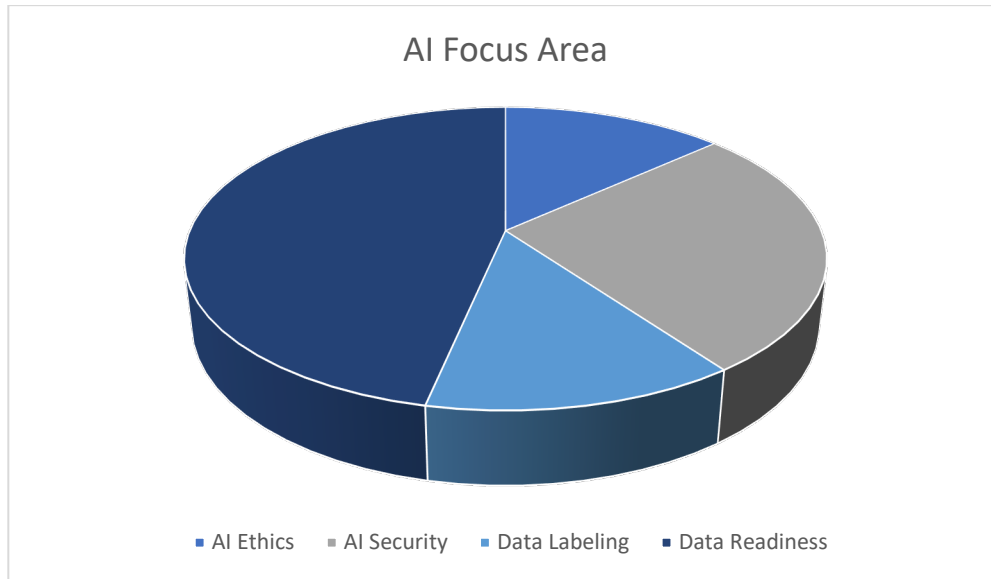

Figure 1. AI Focus Area

Demonstrations have varied in length from 30 to 365 days, with 90 days being the most common.
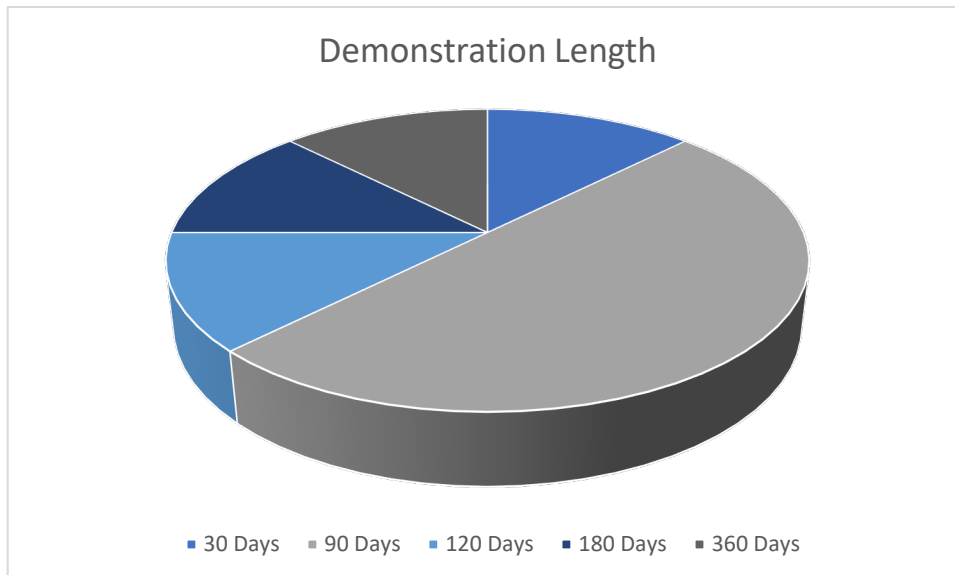

Figure 2. Demonstration Length

We've seen an almost even split between monetary and non-monetary compensation, with an average monetary compensation of approximately $50,000.
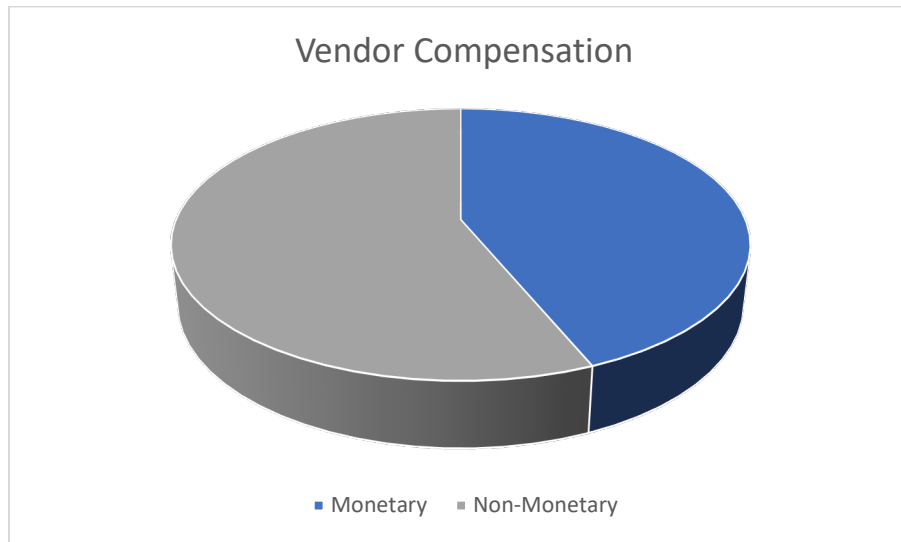

Figure 3. Vendor Compensation

Acquisition Model

To successfully execute this acquisition model, it is critical to understand the distinction between CSO and OTA. As depicted in Figure 4, the CSO and OTA are complimentary, as the CSO is a solicitation, more specifically, it is a general solicitation. You cannot award a CSO. You solicit via CSO, and you award a contract based on your CSO's competitive procedure. Let's dig deeper into the distinction.
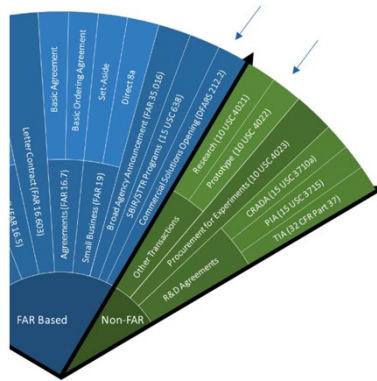
Figure 4. Acquisition Model

Commercial Solutions Opening

The Department of Defense (DoD) Commercial Solutions Opening Pilot (CSOP) program was established in 2016 as a new procurement approach to help the DoD acquire cutting-edge technology solutions more efficiently. The program is designed to promote innovation and open the field to non-traditional defense contractors, including start-ups, small businesses, and commercial firms that might not have considered doing business with the government before.

Before the creation of the CSO program, the DoD faced significant challenges in acquiring emerging technologies quickly and efficiently. The CSO program aims to solve this problem by streamlining the procurement process and creating a platform for non-traditional defense contractors to offer their solutions to the DoD.

One of the key features of the CSO program is the use of a competitive evaluation process to select the most promising solutions. The process is designed to be transparent, objective, and fair. It begins with an initial screening of proposals, followed by a detailed evaluation of the technical and business aspects of the proposals, and ends with a final selection of the most promising solutions. This process ensures that the DoD selects the best solutions from a wide range of non-traditional defense contractors.

Another key feature of the CSO program is that it offers non-traditional defense contractors a way to get involved in government procurement opportunities. This approach promotes innovation and opens the field to new perspectives and ideas. The CSO program seeks to build partnerships with non-traditional defense contractors, with the aim of developing and deploying emerging technologies that will provide significant benefits to the DoD. The program represents a significant shift in the way the DoD acquires emerging technologies.

Other Transaction Authority

The Department of Defense (DoD) Other Transaction Authority (OTA) was first authorized by Congress in the 1958 Space Act. The OTA allows the DoD to enter into agreements with private companies and other non-traditional contractors to develop prototypes, conduct research, and carry out production activities for new technologies or services. The OTA was created to enable the DoD to work with private industry to develop advanced technology solutions that could be quickly deployed to meet national defense needs.

One of the key features of the OTA is that it allows the DoD to enter into agreements with non-traditional defense contractors who may not have the resources or experience to navigate the traditional procurement process. This approach has been particularly useful in the development of emerging technologies, such as artificial intelligence and cybersecurity, where the expertise and innovation of private industry are crucial to success.

Another feature of the OTA is its flexibility. Unlike traditional procurement contracts, which are subject to a wide range of federal regulations and guidelines, the OTA allows the DoD to negotiate terms and conditions that are tailored to the needs of a specific project or initiative. This flexibility enables the DoD to move quickly and efficiently in response to changing national defense needs, and it allows non-traditional defense contractors to bring their innovative ideas to the table.

The OTA also offers a streamlined process for the development and deployment of new technology solutions. Because the agreements are negotiated directly between the DoD and the non-traditional defense contractor, there are fewer bureaucratic hurdles to overcome. This means that projects can be developed and deployed more quickly, allowing the DoD to stay ahead of emerging threats and challenges.

The OTA has been successful in promoting innovation and collaboration between the DoD and private industry. By working together, the DoD and non-traditional defense contractors have been able to develop and deploy advanced technology solutions that might not have been possible through traditional procurement processes. This collaboration has helped the DoD in its attempt to remain at the forefront of technological innovation and meet national defense needs now and in the future.

Fast Following

Mike Brown, the former director of the Defense Innovation Unit (DIU), coined the term "fast-following" to describe a strategy for acquiring emerging technologies. The concept of fast-following is based on the idea that the DoD cannot always be at the forefront of innovation and may not be able to develop new technologies as quickly as the commercial sector. Instead, the DoD should focus on quickly acquiring and adapting existing commercial technologies that have already been proven successful.

Fast-following involves identifying emerging technologies that are commercially available and have already been tested and proven successful in the market. The DoD can then quickly acquire these technologies, adapt them to meet military requirements, and rapidly field them to the warfighter. By adopting a fast-following approach, the DoD can save time and resources, reduce development costs, and get the latest technologies into the hands of the warfighter faster.

This approach also enables the DoD to leverage the commercial sector's research and development efforts, which often have greater resources than the DoD. By acquiring commercially developed technologies, the DoD can capitalize on the private sector's investment in innovation and quickly adopt the latest advancements.

Overall, the concept of fast-following offers a practical solution to the DoD's technology acquisition challenges. By leveraging existing commercial technologies and adapting them to meet military requirements, the DoD can quickly field new capabilities and stay ahead of emerging threats. The question is, how do you design an acquisition model that allows the DoD to fast follow?

Sharing Spectrum: JAIC's Unique Need

The Joint Artificial Intelligence Center (JAIC) was established in 2018 as a result of growing recognition that artificial intelligence (AI) would play a significant role in the future of national defense. The JAIC was created under the direction of the DoD's Chief Information Officer (CIO) to serve as the DoD's focal point for accelerating the adoption of AI across the department.

The JAIC was established to centralize the DoD's AI efforts and provide leadership, guidance, and resources to ensure that the department is effectively leveraging AI to support its mission. The JAIC merged with several other DoD organizations to become the Chief Digital and Artificial Intelligence Office (CDAO) and is responsible for several key tasks, including developing AI strategy and policy, identifying, and executing AI initiatives, and promoting collaboration and coordination across the DoD.

The early JAIC uncovered a need for a rapid, low-cost acquisition vehicle to *try before they buy* innovative technologies. The JAIC needed to quickly move from solution identification to product demonstration in under 30 days, and at price points that were sometimes below industry standards. In many instances the JAIC did not have funding to pay the vendor for their technology demonstration but had alternate "non-monetary" means of compensation. The JAIC was determined to avoid paying for a software license or product that never led to a scalable capability. The team was determined to be good stewards of the taxpayers' dollars and provide mission impact for the warfighter.

This need sparked the design, implementation, and execution of an Artificial Intelligence focused Commercial Solutions Opening later named TryAI.

Tactically Executing the Acquisition Model

1a: Design / Marketing

Designing a CSO has some of the same challenges as designing any complex requirement with the Department of Defense. It often requires various stakeholders to come together and agree on the problem they are trying to solve. To decrease the complexity, we asked stakeholders to think of this as market research, which is a primary advantage of the CSO. We didn't need to know exactly what we were looking for, rather we needed to articulate the broader field of study in which we were interested. We didn't know if industry had a brute force mathematics solution to solve our computer vision problems, but we knew we needed the market to understand that we were looking for computer vision solutions.

As a team, we determined that an 80% solution was acceptable, and we could refine our CSO announcement as we received feedback from the market and our government stakeholders. The goal is to get a "line into the water" and not suffer analysis paralysis to the point of inaction. When we designed TryAI, there simply weren't a lot of CSOs in the ecosystem that we could reference, which added to the challenge. No one we knew was using a CSO + OTA model for no-cost demonstrations of advanced technologies, which increased the complexity and opportunity. We essentially had a blank slate to design exactly what we wanted and needed, and then had the flexibility to iterate on that idea.

One thing I'd like to point out; I stated no one we knew was using a CSO + OTA model for no-cost demonstrations of advanced technologies, and I cannot conclude that no one truly was. DoD acquisition professionals are innovative and forward thinking, and our organization has many pockets of great ideas transpiring concurrently, so I don't want to imply that we did it first. On that note, we continue to refine our CSO and update the focus areas as the needs of our organization change.
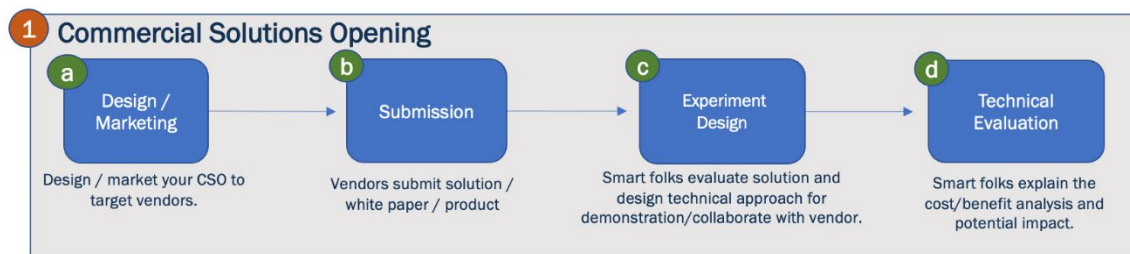

Figure 5. Commercial Solutions Opening

During the design phase, I'd encourage program leads to socialize the idea to the maximum extent practicable but be aware that personalities will need to be managed. I'd also encourage having "buy-in" at a high-level and a champion who can step-in and be the final authority, should stakeholders find themselves gridlocked. I'd encourage not trying to "boil the ocean" and ensure your focus areas are sending the correct message to industry. Pursue focus areas that are relevant to your need and ensure you have qualified personnel to evaluate submissions that propose within those focus areas.

We found that finding the right partners was critical to our success. This included the commercial vendor, but also the government requirement owner. Level setting expectations via candid conversation was critical in forming a common understanding that this process was going to be clunky, at least at first. We found motivated government program leads, with a problem they were eager to solve, and then had to sell industry vendors on the concept of not being paid for their efforts. he concept of non-monetary compensation didn't

resonate with every vendor, but it did with many of them, and that's who we chose to work with.

Starting small and finding strategic partnerships to ensure we worked through major hurdles in our CSO process was critical. We deliberately did not market TryAI to the DoD, as we feared a spike in the use of a half-baked acquisition vehicle would lead to a poor user experience, poor feedback, and a failed initiative. We made a tactical decision to start small and try to get a few early wins, before marketing the CSO more broadly.

Once we decided to increase the marketing, we found that vendors had issues navigating Sam.gov to find our announcement, so we did two things that paid dividends in the long run. First, we named the CSO, TryAI, so it could be searched. Then we built an inexpensive landing page (www.tryai.tech) with a 1-click redirect to the TryAI CSO announcement on Sam.gov. These small ideas had a major impact on the user experience and overall success of the program.

Guidance for the Future

- Start small and find trusted stakeholders invested in your success
- Socialize design ideas and focus areas with key leadership stakeholders
- Find creative marketing strategies to increase digital footprint when scaling

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1b: Submission

As acquisition professionals, it seems we're always trying to find the balance of not overwhelming the vendor into not responding to a solicitation, while also trying to obtain the appropriate level of information. We are also trying to balance response flexibility with response standardization. Our white paper instructions consisted of answering three questions about the product or solution by submitting:

Page 1: Cover Page

Page 2: Answers to Proposal Questions

Page 3: Answers to Proposal Questions

Page 4: Rough Order of Magnitude (as needed)

We found that our technical leads could quickly determine if something was innovative, and worth taking a deeper look. This balance has worked well from an evaluation perspective, but it may be different for the needs of individual organizations.

In the previous section on Design/Marketing, we discussed starting small and then scaling your marketing efforts. With scaling comes more submissions and a likely need for process automation. Once the process was defined, we utilized a cloud-based platform to receive submissions, catalogue them appropriately, and provide an easier review process for technical leads. Depending on our organization and anticipated number of submissions, you may want to consider automated processes at the onset of the project.

Like many organizations, we relied heavily on human oversight and organization in the early days of TryAI. The upside to this strategy is our process was well defined when we began moving towards automation, leading to a smoother implementation. We also were not sure the acquisition model would succeed, candidly.

1c: Experiment Design

As an acquisition professional who enjoys technology discussions, the experiment design phase is a favorite. Due to the open nature of the Commercial Solutions Opening, the design phase is an honest discussion between government and vendor. It's the government program lead's chance to ask questions and gain a better understanding. Going back to our reason for designing TryAI, we're trying to avoid the pursuit of technologies that do not lead to mission impact.

With respect to timeline, I've seen design sessions last 30 minutes and I've seen them span several weeks of back-and-forth discussions. What's great about this phase of the process is the empowerment of the technical leads, and the ability for the vendor to get clarity on expectations. When operating with buy-in on both sides, we see higher quality outcomes in success and in failure. If the experiment design phase lasts hours and the demonstration never kicks-off, that can be success. IF the experiment does not set the vendor and government up for accomplishment, it's best to not pursue the opportunity. We believe what we choose to *not* pursue is as important as what we choose to pursue.

1d: Technical Evaluation

The technical evaluation, called a Peer Evaluation, is designed to allow technical leads to make decisions and take calculated risks. The critical concept behind this is merit-based review, meaning the technical lead has discretion to determine if this product / platform merits a demonstration. This is important for several reasons, not the least of which is the ability for technical leads to make technical decisions without being hindered by the acquisition process. They are empowered to find innovative technical solutions that solve their problems, and begin a demonstration, or experiment, to test their theories and hypothesis.

It is also important, from an evaluation perspective, because when dealing with advanced technologies, it is often difficult to compare products and platforms. In the merit-based construct, there is an understanding that the innovative capability has been deemed by the technical lead to show promise in solving a problem. Here is an example: a technical lead is trying to pursue a platform that enhances computer vision for the warfighter. The platforms have similar outputs, but very different means of achieving those outcomes (see Figures 6 and 7).

Figure 6. Vendor A Capability—GPU-Accelerated Multifilter Image Processing

Figure 7. Vendor B Capability—Brute Force Mathematical Scoring and Adjusting of Pixel Values

Advanced technologies are complex and nuanced, and often to not provide an "apples to apples" comparison. The merit-based evaluation concept allows technical leads increased flexibility and opportunity to accept calculated risks based on their technical judgement. We find that when government program managers find an exciting new technology and *own* the experiment via merit-based evaluation, they feel empowered and able to make an impact, which ultimately leads to better outcomes.

> Guidance for the Future
> - Trust your team's technical judgement and enable a merit based evaluation
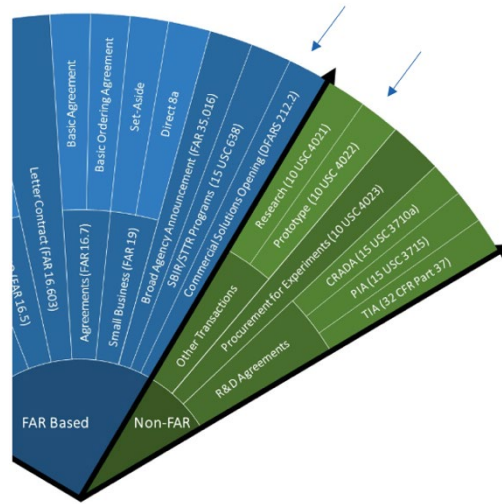> - Do not expect an "apples to apples" comparison

Figure 8. DAU Contracting Cone

Following the technical evaluation portion of the CSO process, we transition into the Other Transaction Agreement. Conceptually, we are transitioning from the solicitation (CSO) to the contract (OTA). The solicitation provided required documentation (white paper, experiment plan, peer evaluation) that is needed to execute the agreement portion of a TryAI CSO award. We will spend less time on the OTA portion of the process, as the reader is likely more familiar with Other Transaction Agreement, and how they function and operate. Given that OTAs are more broadly used across DoD and for a much longer period of time, we opted to adopt best practices from the DoD rather than try to design a new path.
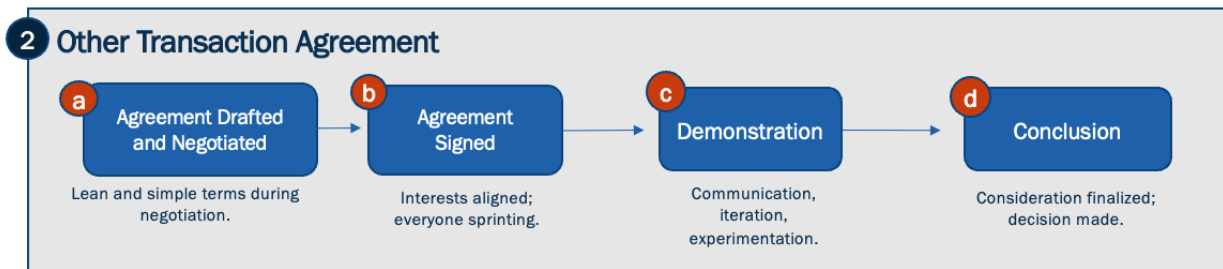

Figure 9. Other Transaction Agreement

2a: Agreement Drafted and Negotiated

We've found that simple, standard language leads to a smooth and timely negotiation process. We use a standard template and modify as needed, based on the complexity of the requirement. We also use this section of the process to think about hedging risk. The government does not always have the same leverage as private sector counterparts but can adapt its advantages for a better outcome. Our team utilizes shorter periods of performance and lower monetary compensation to hedge cost risk. We also try to make the demonstration, or experiment, an accurate representation of the longer-term project.

For example, when we ensure that our computer vision demonstration is on the same data set, in the same cloud environment, with the same constraints as the longer-term

production project, we can mitigate execution risk substantially. It allows government program managers to show the true impact of the project, rather than a proposed impact. This provides government program managers with valuable data points when asking for more funding, should they see the merit in continuing the project.

2b: Agreement Signed

This is an opportunity to align interests between vendor and government and build rapport. Both parties have invested time and effort to this point and are contractually agreeing to continue this pursuit. It's an opportunity to clarify expectations and get the team excited for the project. When all parties have a clear understanding of risks and potential outcomes, chances of success (however that is defined) increase. Ensure a proper kick-off and take time to ensure all roles and responsibilities are defined. Celebrate overcoming the challenges of the DoD acquisition process.

2c: Demonstration

Program management is the key to success once the demonstration has kicked off. Constant communication and a sprint cadence commensurate with the complexity and length of the project is important. Since the government technical lead has signed the peer evaluation and the vendor has signed the agreement (contract) there should be ample buy-in on both sides. Both parties should be owning the demonstration outcome and having candid conversations about what is, and what is not, working. Like most complex endeavors, success ultimately comes down to communication and hard work.

2d: Conclusion

At the conclusion of the TryAI demonstration period of performance, we reach a pivot or persevere decision. Essentially, the technical leads have the flexibility to see more of the demonstration, or hedge risk by concluding the demonstration and allocating resources elsewhere. We find that government technical leads appreciate the flexibility of having these options, and it allows them to make decisions in the best interest of the current mission.

Persevere

A persevere decision could extend the period of performance in the event the government wants to see more of the demonstration. We could opt to add another phase of the demonstration, which allows certain flexibilities with respect to the scope of the effort. We could award a FAR-based contract, like an IDIQ or BPA. The persevere function of this process can vary widely, and that flexibility is beneficial for ensuring the demonstration leads to an acquisition strategy for a viable solution that benefits the mission. The ability to award a follow-on contract is important to the overall structure and appeal of the CSO.

Guidance for the Future

- The goal or a persevere decision is to "fast follow"

Pivot

A pivot decision, for the TryAI CSO, varies based on whether the consideration for the demonstration was monetary. Basically, it depends on if we paid the vendor or not. If we did not, then we typically provide a demonstration report as consideration. If we paid the vendor, then consideration was already received, and we typically conclude with a demonstration out-brief. It is important to note that this is just how TryAI has operated to this point and there are other creative ideas around vendor consideration.

Defense Innovation Unit has a Memorandum of Success, which we think is a fantastic idea and intend to incorporate into our process. We've also seen organizations use a DoD Form DD254 Contract Security Classification Specification as consideration. Understanding what is valuable to the vendor, in lieu of cash, is helpful when structuring your agreement. The goal of a pivot is to "fail fast," or "learn fast."

Dual Prototyping

One important concept that deserves mentioning is dual prototyping or conducting two or more demonstrations at the same time. The CSO + OTA process we outlined above remains the same, but now you have several vendors attacking the same problem. There are advantages to this approach, as you increase learning exponentially. You also increase competitive leverage, as you have competition between demonstrators. This can help when negotiating key attributes like pricing and intellectual property.

Dual prototyping also adds to the complexity of managing the demonstrations and will require additional technical and financial resources. There is a trade-off decision that must be made when considering this approach, and we've seen the benefits outweigh the costs in several instances.
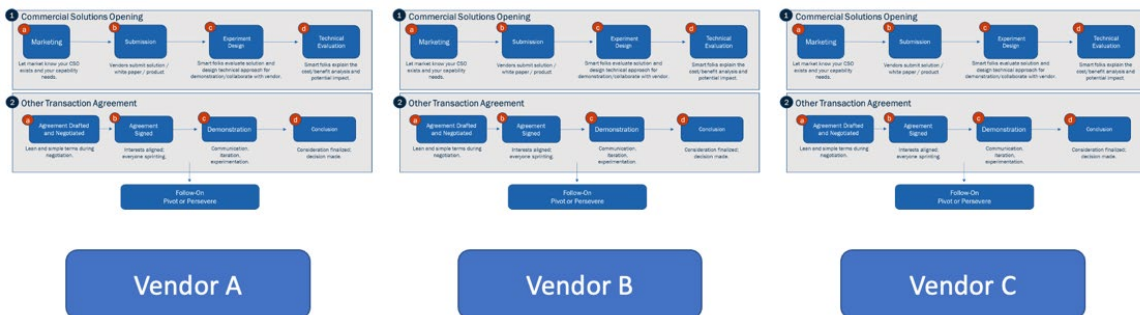

Figure 10. Dual Prototyping

Centralized Versus Decentralized CSO

We found a few critical advantages of having a centralized CSO, meaning your organization owns, operates, and administers the CSO. The main advantage is control. We found that technical leads spent countless hours fostering an environment of trustworthy collaboration and calculated risk-taking. They are often solving complex problems and need key stakeholders to understand the problem and proposed solution. When a technical lead has to reach outside of the organization for acquisition support, they can be disadvantaged. They risk losing the foundation of trust they've worked hard to establish, which is critical for risk-taking. They risk losing the influence that is essential for successful execution of complex strategies.

Decentralized models allow organizations to use another organizations CSO, allowing the user to avoid upfront costs and administrative burden associated with designing and implementing a CSO. With this cost and clerical advantage comes a tradeoff in the form of less control and oversight during the acquisition process.

This lack of oversight and influence in the decentralized model becomes apparent in the funding process. It's no secret that funding projects in the Department can be challenging and executing an inter-departmental transfer of funds can be costly and time consuming. Funding process and timeline is a key consideration in implementing the CSO

model. We would point to Defense Innovation Unit (DIU) as an example of a decentralized CSO with mature processes that impact the department at scale.

Conclusion

The TryAI CSO program, and the CSO + OTA model continues to promote innovation in the DoD with a rapid capability for demonstrations of advanced technologies. With the use case proven within CDAO, a framework is set for all DoD agencies to replicate this model and provide their CTOs with the acquisition flexibility required to achieve mission objectives. Every CTO in the DoD should have a CSO, whether centralized of decentralized, that is designed to meet their needs.

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