



March 13, 2025

Networking and Information Technology Research and Development (NITRD) National Coordination Office (NCO)  
490 L'Enfant Plaza SW  
Suite 8001  
Washington, DC 20024

**Re: Request for Information on the Development of an AI Action Plan**

Dear Acting Director Dohne,

On behalf of the Partnership for Public Service, I am writing to share comments in response to the request for information on the development of an artificial intelligence (AI) Action Plan noticed on February 6, 2025.

The Partnership is a nonprofit, nonpartisan organization committed to building a better government and a stronger democracy. Core to our mission is the belief that a merit-based, nonpartisan civil service is central to our system of government. Since the Partnership's founding over two decades ago, we have advocated across administrations for changes to federal law, regulations, policies, and programs that improve our government's ability to attract, hire and retain a talented workforce that effectively serves the public.

As the administration develops its AI Action Plan, we write with recommendations focused on federal AI workforce capacity to ensure that the federal government serves as an example of effective American AI leadership. AI can be a powerful tool, and it is important not to lose sight of the people using and enabling its functions in government. Without the appropriate workforce and human capital mechanisms in place—including recruitment, hiring, training, development, and retention efforts—the federal government won't be able to fully utilize AI for the promotion of human flourishing, economic competitiveness, and national security.

There are scores of best practices related to the federal workforce and human capital management that can, and should, be applied in the AI Action Plan. Core focus areas for strengthening the federal AI workforce include:

- Developing federal AI capacity by utilizing hiring best practices and available hiring flexibilities;
- Deploying skills-based hiring (per E.O. 13932 from the first Trump administration and subsequent SMEQA pilots) and considering AI-related job classifications;
- Creating modernized position descriptions and making them shareable government-wide; and
- Equipping leaders and supervisors with training on technology principles.

We believe these tenets and specific proposals will help ensure that the federal workforce is equipped to deploy AI and advance our nation's leadership surrounding this technology. Below we further outline recommendations for the AI Action Plan.

**Develop federal AI capacity by utilizing hiring best practices and available hiring flexibilities:**

The federal government must develop AI workforce capacity and should do so through hiring that incorporates learned best practices from recent talent buildups.<sup>i</sup> Specifically, the federal government should hire not just technologists, but data analysts, data scientists, customer experience specialists, and other AI enabling roles. Additionally, to maintain effectiveness and efficiency, it's critical that agencies focus on bringing in early-career employees to build the talent pipeline, not just experts at higher grades. We recommend that the AI Action Plan ensure agencies are focused on recruiting a variety of grade levels and skillsets – this will allow agencies to fill mission-critical skills gaps while hiring for AI talent, enabling the federal government to better leverage this emerging technology in the long run.

To that end, we recommend the Action Plan require the Office of Management and Budget (OMB) and the Office of Personnel Management (OPM) to determine which government-wide or agency-specific hiring authorities best meet the needs of hiring AI talent, develop a recruiting infrastructure that leverages data and technology, hire recruiters or train current staff on how to attract candidates and guide them through the hiring process, and apply a project management approach to streamlining hiring. These best practices can help overcome a disjointed hiring process and have been used by agencies to rapidly grow their workforces in response to various challenges and initiatives.

**Deploy skills-based hiring and consider AI-related job classifications:**

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<sup>ii</sup> emphasizing skills over degree requirements and the passage of the Chance to Compete Act<sup>iii</sup>) 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 and using rigorous technical assessments to identify qualified talent, building relationships with community colleges and workforce development organizations and by removing barriers to professional development and advancement.<sup>iv</sup>

The AI Action Plan should direct agency human capital leadership to facilitate the use of technical assessments in the hiring process, emphasize that four-year degrees should not be required, and direct Chief Human Capital Officers (CHCOs) to ensure that HR specialists understand what alternate programs and bootcamps confer the required skills absent a formal degree.

Additionally, agencies should be directed to identify which occupational series they will use to fill AI roles, as these positions encompass a range of work beyond IT Specialist (2210), Computer Scientist (1550), Computer Engineer (0854), and Program Analyst (0343) focused on AI. Depending on the job classification, there will be certain hiring flexibilities and pay considerations available to bring those candidates on board (e.g. direct hire for certain STEM occupations) that every agency must understand and have available to them – all critical elements that must be considered before ever posting a job.

**Create position descriptions and make them shareable government-wide:**

Rather than using antiquated job titles heavy on government vernacular, the AI Action plan should promote attracting prospective candidates by titling jobs in accordance with industry-wide standards. Additionally, position descriptions should be modernized and clearly outline expected responsibilities. OPM issued guidance on the skills and competencies needed for federal AI positions in July 2023,<sup>v</sup> offering a list of general and technical competencies that can serve as a starting point for agency job analysis efforts – we recommend OPM consistently update this guidance as competencies evolve with technical breakthroughs. To help agencies effectively recruit tech and AI talent, it would be useful to develop a set of common job titles and position descriptions, make those shareable government-wide, and undertake pooled hiring actions for those roles.

**Equip leaders and supervisors with training on technology principles:**

We need federal leaders who are equipped to lead AI decision-making effectively and appropriately. 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. Evaluating, implementing, and using artificial intelligence tools requires successful collaboration between technical and non-technical leaders. The data scientists building AI tools, the Chief Information Officers operating them, the general counsels reviewing their privacy implications, the program managers interpreting their results, plus many others, must collaborate to use AI most effectively.<sup>vi</sup>

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 artificial intelligence tools. 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 which charges OMB with developing a training program to help acquisition professionals better understand AI and its potential risks and benefits.<sup>vii</sup> We recommend the AI Action Plan incorporate training for federal leaders and employees to ensure they are equipped to make the most of AI.

**Conclusion**

Federal agencies will play an important role in unlocking America’s AI potential, and at the heart of these agencies are the employees who will usher in new AI capabilities for greater mission delivery. Attention must be given to federal human capital needs, and any AI Action Plan must include guidance reinforcing best practices in the areas of recruiting, hiring and training. We believe this will allow the federal government – and our country as a whole – to lead as AI technology rapidly evolves.

Thank you for the opportunity to share our thoughts and recommendations for the AI Action Plan.

Sincerely,

Jennifer S. Ives  
Vice President, Artificial Intelligence & Modernizing Government  
Partnership for Public Service

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<sup>i</sup> “Rapid Reinforcements: Strategies for Federal Surge Hiring,” Partnership for Public Service and Democracy Fund, October 2020, [https://ourpublicservice.org/wp-content/uploads/2020/10/Rapid\\_Reinforcements\\_2.pdf](https://ourpublicservice.org/wp-content/uploads/2020/10/Rapid_Reinforcements_2.pdf)

<sup>ii</sup> 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>

<sup>iii</sup> “Chance to Compete Act of 2024” [Public Law No: 118-188](#).

<sup>iv</sup> “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>

<sup>v</sup> “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>

<sup>vi</sup> “In the Public AI,” Partnership for Public Service, December 2022, <https://ourpublicservice.org/publications/in-the-public-ai/>

<sup>vii</sup> “In the Public AI,” Partnership for Public Service, December 2022, <https://ourpublicservice.org/publications/in-the-public-ai/>