Government Use of AI/SI in Federal Contracting: What to Ask and How

Federal contractors should be asking the Government more questions about its use of artificial intelligence (AI/SI)/Super Intelligence (SI), particularly when AI/SI may influence how requirements are developed, how proposals are evaluated, and how award decisions are documented.

From the Contracting Officer's chair, I would encourage industry to approach these questions as matters of transparency, fairness, evaluation integrity, and accountability, rather than simply asking whether the Government uses AI/SI.

Here are the questions I would recommend contractors consider asking during the presolicitation and solicitation Q&A periods, industry days, exchanges, RFIs, and other market research and marketing activities.

1. AI/SI in Solicitation Preparation

Is AI/SI influencing what the Government asks contractors to propose?

- Was generative AI/SI used to develop or refine the statement of work (SOW), performance work statement (PWS), specifications, or other solicitation requirements?
- If AI/SI was used, how did the Government validate the resulting requirements for accuracy, feasibility, and consistency with its actual mission needs?
- Was AI/SI used to develop evaluation factors, subfactors, or rating criteria? If so, how were those criteria reviewed to ensure they are relevant to the requirement?
- Was AI/SI used to develop the Independent Government Cost Estimate (IGCE), pricing assumptions, or labor estimates? What independent validation was performed?
- What steps were taken to identify and eliminate potentially restrictive, contradictory, or technically inaccurate requirements introduced through AI/SI-generated content?

2. AI/SI in Proposal Evaluation

As a former Contracting Officer, I suggest paying close attention to how the evaluation will be conducted.

- Will the Government use AI/SI tools to assist in reviewing, analyzing, summarizing, comparing, or evaluating proposals?
- **If AI is used to review or compare SF 330 submissions, how will the Government ensure that the evaluation considers the substance of each firm's professional qualifications, relevant experience, key personnel, and demonstrated capabilities rather than relying on keyword matching, document structure, or AI-generated rankings?**
- If AI/SI will be used, which evaluation activities will involve AI/SI assistance, and which will be performed exclusively by Government evaluators?

© Federal Subcontract Solutions LLC 2026

- Will AI/SI-generated analyses or summaries be used to identify proposal strengths, weaknesses, deficiencies, or risks?
- How will the Government verify that AI/SI-generated summaries accurately reflect the complete proposal and do not omit material information?
- What safeguards are in place to prevent AI/SI from introducing evaluation considerations that are not disclosed in the solicitation?
- Will AI/SI be used to compare competing proposals, identify discriminators, or support best-value tradeoff analyses?
- Will Government evaluators independently review the underlying proposal content before adopting findings or conclusions generated with AI/SI assistance?
- How will the Government ensure that AI/SI does not disadvantage proposals because of their formatting, writing style, document structure, or terminology when those characteristics are not evaluation criteria?

3. AI/SI in Source Selection and Award Decisions

Who is exercising judgment, and how is that judgment documented?

- Will AI/SI-generated analyses, recommendations, or comparisons be used to support the Source Selection Authority's award decision?
- What procedures ensure that the Source Selection Authority independently exercises the judgment required for the award decision?
- Will AI/SI-generated material be incorporated into evaluation reports, consensus findings, source selection documentation, or the award decision?
- How will the Government distinguish between conclusions independently reached by acquisition personnel and those initially suggested by AI/SI?
- What independent human review procedures are in place to identify and correct inaccurate or unsupported AI/SI-generated conclusions by the evaluation board or any other selection authority before an award decision is finalized?
- Will the Government retain AI/SI-generated analyses that materially influenced evaluation findings or the source selection decision as part of the acquisition record, consistent with applicable records requirements?

4. Protection of Contractor Information

What happens to the information we submit?

- Will contractor proposals, technical approaches, pricing information, or proprietary data be entered into or processed by AI/SI systems?
- What safeguards prevent contractor information from being retained, used to train Government or commercial AI/SI models, or disclosed to unauthorized parties?
- How will the Government protect proprietary proposal information processed through AI/SI systems?
- Are the AI/SI tools authorized for the types of sensitive information contained in contractor submissions?

© Federal Subcontract Solutions LLC 2026

- How does the Government prevent information from one offeror's proposal from influencing the AI/SI-assisted evaluation of another offeror?
- What procedures govern access to, retention of, and disposition of contractor information processed through AI/SI systems?

5. AI/SI Transparency, Accountability, and Post-Award Debriefings

How can a contractor understand whether AI/SI affected the outcome?

- Will the Government disclose whether AI/SI was used in the evaluation process and describe the nature of that use?
- If AI/SI-assisted analysis materially contributed to an evaluation finding, will the specific finding and AI/SI tool being used be disclosed in the debriefing?
- During a post-award debriefing, will offerors be able to ask whether AI/SI was used to analyze or summarize their proposals?
- What process is available to address an apparent factual error in an evaluation finding that may have originated from AI/SI-generated analysis?

These are questions contractors can ask, not assurances that agencies must disclose every AI/SI tool, prompt, or internal evaluation procedure.

The central issue isn't whether the Government uses AI. It's whether the Government can demonstrate that its requirements are valid, its evaluations are fair, and its award decisions remain the product of accountable human acquisition judgment.

References:

- FAR 15.304 and 15.305: Evaluation factors must be identified in the solicitation, and proposals must be evaluated against the specified factors and subfactors.
- FAR 15.308: The Source Selection Authority's decision must represent independent judgment and be documented.
- FAR 3.104-4: Contractor bid or proposal information and source selection information must be protected against unauthorized disclosure.

NOTE: These citations reflect the FAR provisions shown on Acquisition.gov; individual acquisitions may operate under applicable RFO class deviations or other agency-specific procedures.

© Federal Subcontract Solutions LLC 2026