



FRAMEWORK FOR AI REPORTING (FAIR)

Overview

In today's federal acquisition landscape, we are facing the very real prospect that the use of Generative Artificial Intelligence (GenAI) can draft most of the entire proposal or quote submissions on behalf of a vendor. While this presents opportunities for efficiency and innovation, it also introduces new challenges around transparency, accountability, and the integrity of the evaluation process.

The government has been increasing its use of multi-phase acquisitions, which lowers barriers to entry and often permits a short-written response in the initial phase. This has led to an overwhelming increase in low-rated quote or proposal submissions, as many entrants attempt to submit something quickly and easily, simply to be included. In a [2024 survey](#), some agencies found a 40% increase in proposals, driven by the rise of AI tools, with nearly 90% of them being non-compliant. The LAB has seen similar evidence in the many projects it has consulted on. While the government doesn't want to overly limit submissions, it must be more efficient in ensuring it spends adequate time on viable vendors.

To address this, agencies can take a proactive approach and introduce a requirement for vendors to disclose the use and extent of AI in their written submissions. Doing so ensures that evaluators understand how the content was generated, can better assess the underlying expertise and capabilities of the offeror or quoter, and can appropriately account for any risks associated with AI-assisted outputs. This concept advances modern acquisition practices by recognizing the growing role of AI in the federal procurement space. It also ensures the government retains the ability to make well-informed, transparent, and equitable decisions.

Include the language contained in the [Consider This Language](#) section below. For more about multi-phased acquisitions, please review the [Down-Select](#) technique from the [Periodic Table of Acquisition Innovations \(PTAI\)](#). [Oral Presentations](#), briefings, and [technical demonstrations](#) are another way to guard against written submissions where the originating content is not known to the government. There is currently no prohibitions or guidance in the Revolutionary FAR Overhaul or other governmentwide policy concerning this concept.

Key Considerations

Establish criteria:

- What must be disclosed?
- What is exempt?
- Will the government consider AI detection?

Communicate Submission Requirements:



- Define expectations for AI-assisted content, including how it must be disclosed, and any limitations on its use.
- Submissions must be compliant with all stated requirements, and failure to follow guidelines, including those related to AI use, may result in removal from consideration.
- Clearly state whether the government may use AI detection tools at its discretion during the compliance and evaluation processes.

Consider This Language

The vendor must disclose whether any portion of its quote/proposal, including narrative responses, technical descriptions, pricing information, or supporting documentation, was drafted, generated, or otherwise prepared using artificial intelligence (AI) tools, systems, or applications. The disclosure must identify:

The Vendor:

- The specific AI tool(s) or system(s) used and if that tool or system is proprietary.
- The nature and extent of the AI's contribution (e.g., drafting text, data analysis, summarization).
- Any human review, editing, or validation performed on AI-generated content.
- Failure to provide this disclosure may result in the proposal/quote being deemed non-compliant / non-responsive and ineligible for award.

The government reserves the right to request additional information regarding the Vendor's use of AI in quote preparation to ensure compliance with solicitation requirements and to assess potential risks related to accuracy, confidentiality, and intellectual property. For example, for a Phase 1 experience volume that is written, the government may set up a phone interview to ask questions in real time to consider in the evaluation of that factor. The government may also elect to use AI detection tools, preferably agency approved, to assist in its verification and compliance process.

By submitting a proposal/quote that includes content created, assisted, or derived from AI, the Vendor affirms that it possesses full rights to provide such content to the government and that no third party rights, licenses, or terms of use restrict the government's unlimited rights to use, reproduce, disclose, modify, or distribute the submitted information for any government purpose.

See the [FAIR Appendix](#) for a collection of samples from various solicitations, as well as language indicating various levels of restriction or allowance.

Why Is This Innovative?

Increased Transparency

AI can influence everything from pricing models to technical approaches, but without disclosure, evaluators may not understand what is driving a proposal's outcomes. Requiring vendors to explain their



AI use helps decision-makers see what is automated, what is human-driven, and where risks or dependencies exist.

Better Risk and Compliance Assessment

AI introduces new considerations like data bias, security vulnerabilities, and regulatory exposure. By asking vendors to disclose how and where AI is used, the government can more effectively assess ethical use, data handling practices, and alignment with emerging AI policies and standards.

Promotes Fair Competition and Innovation

When vendors know they must articulate their use of AI in their submission, they are incentivized to be intentional rather than superficial in their use of the technology. This leads to higher quality proposals or quotes, clearer differentiation between offerors or quoters, and solutions that are more thoughtfully designed rather than just labeled as AI.

Questions? Contact The LAB at thelab@doc.gov. The LAB is happy to connect and think through the next steps with you.

***Disclaimer:** The information contained in this document is merely an idea or opinion of The LAB and does not constitute formal legal or policy guidance of any kind.

