

Agencies Should Collect and Apply Lessons Learned to Improve Future Procurements

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A report to congressional requesters

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What GAO Found

Federal agencies reportedly more than doubled their use of artificial intelligence (AI) from 2023 to 2024, and they used a range of approaches to acquire additional AI capabilities through fiscal year 2025. GAO identified trade-offs facing agencies as they acquire AI, and some associated challenges and benefits. For example:

- **Agency-directed vs. vendor-driven approaches.** Some agencies awarded new contracts in pursuit of AI solutions. In other instances, industry introduced capabilities to agencies in the absence of specific AI requirements.
- **Contracts vs. other agreements.** Agencies used different types of contracts to acquire AI capabilities. In some instances, agencies also leveraged other agreements not governed by federal acquisition regulations to develop more advanced AI capabilities.
- **AI as a service vs. a product.** Some agencies bought AI as a product, such as software. However, agency officials told GAO they acquire AI as a service where the vendor provides AI capabilities and outputs on an ongoing basis.

GAO identified several strategic and programmatic challenges agencies faced when acquiring AI capabilities.

Key Procurement Challenge Areas Identified by Selected Agencies

Strategic	Programmatic
Access to subject matter experts	Requirements definition and contract terms
Protections for government data and intellectual property rights	Early testing and continuous evaluation
Traditional acquisition timeframes and contract approaches	Artificial intelligence pricing and overall cost

Source: GAO analysis of interviews with agency officials from the General Services Administration and Departments of Commerce, Defense, Homeland Security, and Veterans Affairs. | GAO-26-107859

In April 2025, the Office of Management and Budget (OMB) issued guidance to help agencies acquire AI responsibly. OMB directed agencies to update their AI policies to comply with OMB’s requirements. GAO previously reported that agency-level implementation is critical to achieving acquisition goals directed by OMB (GAO-25-107398).

In this review, GAO found the selected agencies were not yet systematically collecting lessons learned from AI acquisitions—a necessary first step to share knowledge about AI acquisitions in accordance with OMB guidance. OMB has stated that agencies should share knowledge about AI acquisitions through a web-based repository developed by the General Services Administration (GSA). However, officials at four agencies—GSA and the Departments of Defense (DOD), Homeland Security (DHS), and Veterans Affairs (VA)—told GAO they were not prepared to do so because their agency policies did not require them to collect lessons learned. As a result, the agencies are missing opportunities to identify and apply best practices—such as contract terms related to data rights or testing requirements—or to avoid mistakes as agencies increasingly acquire AI.

Why GAO Did This Study

Industry leads AI development, reportedly investing over \$250 billion in 2024 alone. Federal agencies are finding many opportunities to use AI to execute their missions. They already use AI for veteran services, enhancements to weapon systems, and administrative tasks. To realize the benefits of AI, federal agencies often contract with companies to acquire solutions. Members of Congress and others have raised concerns about federal AI acquisitions. These concerns include long-standing acquisition issues, such as fostering competition, as well as issues specific to AI, such as training AI models on flawed data.

GAO was asked to review federal AI acquisitions. This report addresses (1) acquisition approaches agencies are using to adopt AI, (2) types of challenges agencies face when acquiring AI capabilities, and (3) the extent to which selected agencies are prepared to share knowledge related to acquiring AI solutions.

GAO conducted in-depth reviews of 13 AI acquisitions at four federal agencies—DOD, DHS, GSA, and VA. GAO selected these agencies based on maturity of AI acquisition efforts and approaches to acquiring AI capabilities, among other factors. GAO reviewed the agencies’ relevant policies, and interviewed senior AI acquisition leaders at the selected agencies. GAO also analyzed OMB guidance.

What GAO Recommends

GAO is making a total of four recommendations. Specifically, GAO is recommending that DOD, DHS, GSA, and VA update their policies to require officials to systematically collect lessons learned from AI acquisitions to enable sharing and application by other agencies. The agencies concurred with all of the recommendations.