

MARCH 2026

# A Pre-Mortem on OPM's HR 2.0 Initiative

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## Introduction. Imagining Failure in Order to Support Success

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Large-scale IT modernization project implementations fail with remarkable regularity. They fail in private companies with strong profit incentives and unified leadership. They fail in state and local governments with narrower missions and simpler workforces. And they fail—often spectacularly—in the federal government. Entire multi-billion-dollar industries exist precisely because implementing enterprise resource planning (ERP) systems is hard: technically complex, organizationally disruptive, politically fraught, and culturally destabilizing.

The U.S. Office of Personnel Management (OPM)'s new HR 2.0 initiative is therefore entering hostile terrain by default. The initiative aspires to rationalize, consolidate, and modernize a sprawling ecosystem of federal human resources systems that has grown organically over half a century. It seeks to replace dozens of agency-specific systems, hundreds of interfaces, and innumerable manual workarounds with a standardized, interoperable, enterprise-wide platform capable of supporting modern workforce management.

Those of us who have followed federal HR modernization for years desperately want this effort to succeed. The current HR IT landscape is costly, brittle, opaque, insecure, and increasingly misaligned with how the federal government needs to recruit, manage, pay, and deploy its workforce. As OPM has documented and independent research shows, the federal government probably wastes billions of dollars maintaining hundreds of systems that slow agencies down, force them to duplicate effort, and obfuscate rather than clarify the data required to make business and workforce decisions. Some of these systems are decades old and have been assessed as a high risk to government operations, if they should fail. Modernization is no longer optional. It is a prerequisite for addressing mission delivery, workforce planning, and public trust.

But optimism is not a plan, and aspiration is not execution. History suggests that the greatest danger to large federal IT programs is not a lack of good intentions, but a failure to fully internalize how hard it is to succeed and avoid the missteps of the past. In that spirit, this paper adopts an intentionally uncomfortable posture.

This paper is a *pre-mortem*. Rather than waiting until a future GAO report, Inspector General audit, or congressional hearing explains why this effort underperformed, we imagine that future now. We assume—purely for analytical purposes—that the initiative did not achieve its intended outcomes. From that hypothetical vantage point, we ask:

- What were the most likely failure modes that doomed the effort?
- What could OPM, Office of Management Budget (OMB), Congress, and agencies have done earlier to materially reduce those risks?

OPM, agencies, and OMB have already invested substantial time and energy in planning this effort. This paper is intended to complement that work by surfacing structural vulnerabilities early, when they can still be addressed; to give voice to concerns that, in some cases, government staff are probably already grappling with either privately or in their existing teams; and to guide implementation teams' emphasis today under the presumption that success, with care and forethought, is possible despite all the barriers.

## A Pre-Mortem for Risk Management Planning

OPM's HR 2.0 Initiative addresses an often-neglected part of the federal business enterprise that has long needed attention from senior leadership, and those of us who have followed federal HR modernization for years want this effort to succeed. That is why we have created this pre-mortem, to imagine potential failures, their causes, and actions OPM can take now to mitigate or avoid them. We have also included, as an appendix, a summary in the form of a Risk Management Framework that OPM, OMB, and others may find more conducive to operationalizing the discussion contained herein.

Briefly, this pre-mortem is organized around seven key potential Failure Modes:

**Failure Mode 1. The Single-Award Strategy Backfires.** Actions OPM can take to mitigate the threat of vendor lock-in, ensure continued innovation, and protect against or prepare for the ramifications of a post-award contract protest.

**Failure Mode 2. An OPM-Led, OPM-Managed Effort Becomes a Bottleneck.** Recommendations concerning capacity, governance, and stakeholder engagement that can help OPM succeed in managing a program of nearly unprecedented complexity.

**Failure Mode 3. Contracting Directly with OEMs Goes Awry.** Strategies for working within a novel supply chain strategy to ensure delivery of a massive, multifaceted implementation effort.

**Failure Mode 4. Configuration Management Becomes Unmanageable.** Aspects of governance, including most prominently around tailoring of the solution to meet individual agencies' needs.

**Failure Mode 5. Funding Is Insufficient, Unreliable, or Unsustainable.** Among other suggestions, a recommendation to examine the possibility of appropriating implementation funding directly to OPM while reverting to revolving funds for operations and maintenance.

**Failure Mode 6. Agencies Are Not Ready When Their Turn Comes.** Strategies for remaining agile and responding to the likelihood that not all agencies will be equally well-prepared when they begin their implementation.

**Failure Mode 7. Executive Sponsorship Wanes Over Time.** Steps that OPM and OMB can take to institutionalize the HR 2.0 effort before changes in political leadership or priorities inevitably begin to take their toll.

# A Brief History of HR IT Modernization and Consolidation in the Federal Government

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## Early Agency-Built HR Systems

Federal agencies, like their private sector counterparts, began building enterprise HR and payroll systems in the 1970s. These systems were typically bespoke, homegrown solutions designed to meet the specific needs of individual agencies. They were written in at-the-time-modern programming languages such as COBOL and Natural, languages that are now considered archaic, despite the fact that they continue to underpin mission-critical systems across banking and government.

At the time, this approach made sense. Commercial HR software barely existed and the federal government was one of the largest employers in the world. Computing helped them manage complex, routine tasks like payroll and were therefore highly customized to specific needs. There was little expectation that systems would interoperate across agencies as the internet was years off. Each organization optimized for its own statutory authorities, workforce composition, and operational needs.

Over time, however, these systems accreted complexity. New laws, pay plans, labor agreements, and reporting requirements were layered on top of old code. Documentation decayed. Original developers retired with little documentation left over about what they did. Institutional knowledge became increasingly fragile. What remained were systems that worked—until they didn't—and that were extraordinarily difficult to modify, integrate, or retire.

## The Commercial ERP Wave

In the 1990s, commercial ERP systems—led by vendors such as SAP and PeopleSoft—rose to prominence in the private sector. Initially focused on manufacturing and finance, these platforms gradually expanded to include HR, payroll, and talent management functionality for almost all large enterprises.

By the late 1990s, federal agencies began adopting commercial HR systems, overwhelmingly selecting PeopleSoft. These implementations promised modernization, vendor support, and alignment with private-sector best practices. In practice, agencies often customized these systems extensively to replicate legacy processes and accommodate federal- and agency-specific requirements inherent in the custom solutions they replaced. While modernization occurred, standardization largely did not.

## Payroll Consolidation: A Rare Success

By the early 2000s, the federal government operated more than twenty largely bespoke payroll systems, each of which effectively did the same thing: calculate payroll and send instructions to Treasury to process. This level of duplication was expensive and untenable, leading the Bush administration to adopt payroll consolidation as a pillar of their newly-minted e-Government agenda and the newly established HR Line of Business.

This effort is notable for both its sponsorship and its execution. The initiative was driven directly by OMB Director Mitch Daniels, with strong leadership from OPM Director Kay Coles James. OPM conducted a formal internal competition among federal payroll providers, resulting in the designation of four agencies—The General Services Administration (GSA), Defense Finance and Acquisition Service (DFAS), Department of Agriculture's National Finance Center (NFC), and the Department of the Interior's National (now Interior) Business Center (IBC)—as payroll shared service providers, responsible for processing not only their own agency's payroll but also that of several customer agencies. USDA, for example, processes payroll for both DHS and DOJ, while DFAS processes payroll for VA and DOE, among other arrangements.

Despite early skepticism and schedule slippage, payroll consolidation largely succeeded. By 2006–2007, most civilian agencies had migrated payroll operations to one of these providers. OPM later estimated that the effort produced roughly \$1 billion in savings and cost avoidance, with continued benefits accruing over time, including better standardization and control over the data supply chain from agency systems to OPM.

Crucially, this payroll consolidation was not explicitly authorized by statute or executive order. It succeeded because senior leaders treated it as a management imperative, and they enforced compliance and sustained attention long enough to overcome institutional resistance.

## **The Long Plateau: 2007–2024**

After payroll consolidation, OMB sought to extend the shared services model to broader HR functionality. Beginning in 2007, OMB issued a series of memoranda requiring agencies to migrate to approved HR shared service centers when modernizing. This policy trajectory culminated in OMB Memorandum M-19-16, which established Quality Service Management Offices for HR, financial management, grants management, and cybersecurity.

Despite these directives, progress was uneven. Some agencies modernized successfully; many did not. Fragmentation persisted. A defining feature of this period was the absence of sustained, senior-level executive sponsorship comparable to that seen during payroll consolidation. HR IT modernization became a perennial priority—but rarely the top priority.

## **The DOD Tried & Failed to Consolidate**

The high-profile failure of the Defense Civilian Human Resources Management System (DCHRMS) offers a sobering example of how HR IT Modernization efforts can go awry in a complex Federal Government environment. The project started as a \$36M, one-year proof of concept in 2018 and then morphed into a years-long effort to consolidate at least six separate DOD systems based on Oracle's E-Business Suite software onto a single, DOD-wide Oracle Cloud human capital management (HCM) platform. By the time Secretary of War Pete Hegseth announced the cancellation of the program in March 2025, the department had reportedly spent \$316M and claimed the project was 780 percent over budget.

While that accusation may be somewhat misleading, the facts are sobering. The project moved from proof of concept into full execution without a formal acquisition or rigorous planning, leaving the systems integrator that managed the legacy systems also in charge of implementing the new system. The department tried mightily to standardize business processes across DOD services, but people familiar with the project say that middle managers and subject matter experts across the department added requirements that led to scope creep as the project wore on. As the project timeline began slipping, Oracle introduced new technologies and features that required further slippage in order to incorporate them into the program baseline. By the time the program was cancelled, it was not clear what DOD's measures of success were. That the integrator responsible for deploying the new system was simultaneously profiting from operating the legacy systems also presented an obvious conflict of interest.

The DCHRMS saga highlights several pitfalls associated with large-scale enterprise IT modernization programs. One may be the failure to maintain a rigorous convergence baseline and guard against scope creep. That seems to have been compounded by a business model and accountability structure that was either not well thought through and/or did not adhere to best practices. And ultimately, when the program was unable to deliver concrete, measurable outcomes in a reasonable and well-defined timeframe, the state of technology evolved, rendering the program's initial targets irrelevant and forcing the program to rebaseline.

## HR 2.0 Is a Good Idea, but It Has Risks

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At its core, OPM's HR 2.0 initiative is a good one and addresses an often-neglected part of the federal business enterprise that has long needed attention from senior leadership. It is also perhaps the most ambitious attempt ever made to solve this problem once and for all. In fact, OPM has made a thoughtful series of choices related to how it has structured the program that demonstrate the administration's seriousness and commitment, such as:

- **Single Award.** Currently, several different vendors service the federal government, including Oracle, SAP, Workday, and others. This creates interoperability and data standards challenges, as upgrades need to be made in each proprietary code-base when policies or direction changes. OPM's approach in HR 2.0 solves for this by mandating a move to one, single software company, which can tightly integrate the entire federal enterprise into a standard solution that is easier and cheaper to maintain.
- **Direct Contracting with Software OEM.** Historically, when agencies moved to new systems, they contracted with a large system integration (SI) that served as something of a middle-man between the agency and the company that actually built the software. These SIs served to translate between the two groups: business requirements from agency to vendor, technical specifications from vendor to agency. However, this creates additional cost and management complexity as the agency is reliant on a third party to act in their interests. OPM's approach in HR 2.0 solves for this by establishing a direct contracting relationship between OPM and the eventual software vendor so that OPM control vendor behavior and changes to the underlying single code-base.
- **Recoup Costs from Agencies.** There are a variety of models for funding mandatory government-wide services, including both specific appropriations and also pooling funds from agencies to a central account. For HR 2.0, OPM appears to be electing the latter path, which gives agencies some "skin in the game" and ownership over the resulting solution—they're paying for it, so they are true customers rather than simply takers of OPM's direction.
- **Explicit Direction to Agencies.** There are various ways to drive adoption of single solutions and OPM has elected to pursue a top-down, mandatory, whole-of-government approach which establishes a schedule and requires adoption. This solves many common collective action problems across government—no agency wants to go first and everyone would prefer to push the timeline out as far as possible.

The current initiative carries forward insights and strategies that formed the basis of much of OPM's recent HR Line of Business (HR LOB) and Human Resources Quality Services Management Office (HR QSMO) work—but in a far more directed and muscular fashion, and with a much higher level of executive sponsorship. Rather than coordinating agency-led modernization through a marketplace model, OPM is pursuing a single, government-wide core human capital management (HCM) solution.

HR IT modernization has ascended to a level of visibility and priority not seen since the early 2000s. This heightened attention brings clear advantages. It also raises the stakes. Funding remains unresolved. Timelines appear aggressive relative to historical experience. Sustainability beyond the current administration is uncertain.

## Predicting Failure Modes & Mitigating the Risks

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These tensions frame the risk landscape that follows, as we explore seven key potential “Failure Modes” that explain why an initiative like this one might fail, and discuss what OPM, OMB, and other key actors in the Federal ecosystem can do now to prevent that from happening.

### Failure Mode 1. The Single-Award Strategy Backfires

| “Industry Doth Protest Too Much”

One of the most consequential—and controversial—design choices in OPM’s Federal HR IT Modernization initiative is the decision to pursue a single-award contract for the government’s core human capital management (HCM) system. This approach represents a clear departure from the standards-based, marketplace-oriented strategy that characterized earlier HR QSMO and HRLOB efforts, which emphasized multiple providers, modular offerings, and competition at the margin.

Under prior HR QSMO and HRLOB efforts, OPM and OMB emphasized the creation of a standards-based marketplace. The theory of the case was straightforward: by defining common data standards, interfaces, and business rules, the federal government could allow agencies to choose among multiple shared service providers and commercial products while still driving convergence over time. Competition would reduce vendor lock-in, preserve agency autonomy, and apply ongoing pressure to improve price and performance.

The current initiative moves decisively away from that model. Instead of coordinating agency-led migrations to a small number of approved platforms, OPM is working with GSA to procure and implement a single, government-wide core HCM system through a single-award contract. Agencies will not be “shopping” in a marketplace for their core system; they will be onboarding to a centrally selected platform.

#### The Case for a Single Award

From a governance and execution standpoint, the single-award approach has real and defensible advantages.

**First, it is simpler to manage.** Large-scale ERP implementations are inherently complex. Managing multiple vendors, platforms, and integration paths adds layers of coordination risk. A single core system reduces the number of moving parts and creates a clear line of responsibility for delivery, performance, and outcomes.

**Second, it may improve speed to results.** Marketplace approaches often devolve into protracted planning exercises, with agencies delaying decisions while waiting for better options or negotiating exceptions. A single-award strategy forces convergence earlier and reduces the opportunity for agencies to linger indefinitely in analysis paralysis.

**Third, it can improve accountability.** When multiple vendors and service providers are involved, failure often produces finger-pointing: the system vendor blames the integrator; the integrator blames agency requirements; the agency blames governance. A single-award approach increases the likelihood that all parties are, in effect, “stuck with each other,” creating stronger incentives to solve problems collaboratively rather than litigate responsibility.

**Fourth, it acknowledges the reality of vendor lock-in.** For systems of this scale and complexity, true vendor portability is often more theoretical than real. Data models, business logic, configuration decisions, and user training all embed deeply into organizational processes. From this perspective, pretending that robust competition will persist post-implementation may be more misleading than helpful. A strategy focused on building a constructive long-term partnership may be more honest—and more effective—than maintaining a nominal threat of competition that is unlikely to materialize.

These arguments are not naïve. They reflect hard-earned lessons from prior federal modernization efforts, align with broader “OneGov” principles emphasizing enterprise solutions over agency-by-agency optimization, and are consistent with the choices that large corporations in the private sector often make, for similar reasons.

## Why This Could Still Go Wrong

Despite these advantages, the single-award strategy carries substantial risks—many of which could independently derail the initiative if not actively managed.

**Vendor lock-in remains the most obvious concern.** A single-award approach concentrates technical, financial, and institutional power in one vendor relationship. If costs rise, performance lags, or the product roadmap diverges from government needs, the government’s leverage may be limited. Even if exit is theoretically possible, the practical and political barriers to switching systems are enormous and would be exacerbated by the possibility that no other vendor would have fine-tuned its product for operation in the federal environment.

**The protest risk is real and potentially existential.** High-dollar, high-visibility, single-award procurements are magnets for bid protests. A sustained protest could delay implementation by years, eroding momentum, weakening executive sponsorship, and potentially forcing OPM to compromise into a less coherent outcome—such as reverting to a duopoly or marketplace model under duress. Even if OPM ultimately prevails, time lost to protest is time not spent modernizing.

**Perceptions of politicization may linger even after award.** In an environment of heightened skepticism toward federal procurement, a single-award decision may be perceived—fairly or unfairly—as political, ideological, or captured by vendor influence. These perceptions matter. They can undermine congressional support, agency buy-in, and public confidence, even if the procurement itself was conducted rigorously and impartially.

**Fixed-price contracting can mask future risk.** Single-award strategies often rely on firm, fixed-price task orders to create cost discipline. But ERP history suggests that complexity emerges during implementation, not before it. When requirements evolve or unanticipated needs surface—new pay plans, statutory changes, security requirements—the result is often a cascade of change orders. Costs rise, transparency declines, and adversarial dynamics emerge.

**Innovation pressure may dissipate.** Competition is not just about price; it is about ideas. A single-award environment risks stagnation if incentives are not carefully designed. Vendors may rationally prioritize contractual compliance over experimentation, particularly when innovation introduces delivery risk.

**Standards still matter—and can be neglected.** Selecting a single core system does not eliminate the need for rigorous data standards, interoperability requirements, and enterprise architecture discipline. If attention shifts prematurely from standards to implementation, the government may end up with a centralized system that nonetheless fails to deliver enterprise-wide visibility or interoperability.

**A marketplace is still required around the core.** Even the most robust HCM platforms do not solve every problem. Agencies will continue to need complementary tools for analytics, case management, learning, identity, and mission-specific workflows. Without a healthy ecosystem of “wrap-around” solutions, the core system risks becoming a bottleneck rather than an enabler.

**Cost opacity can increase over time.** As implementation progresses and change requests accumulate, costs can become harder for agencies and policymakers to track. Without deliberate transparency mechanisms, the single-award model may obscure—not clarify—the true cost of modernization.

## Recommendations: Making a Single Award Work

If OPM is committed to a single-award strategy—and there are sound reasons to be—it must be executed with unusual discipline and foresight. Several mitigation strategies follow directly from the risks outlined above.

**Build innovation incentives directly into task orders.** Rather than assuming innovation will emerge organically, OPM should explicitly reward it. This could include incentive fees tied to measurable improvements in usability, automation, or data quality, as well as structured mechanisms for piloting and scaling new capabilities.

**Pre-negotiate cost escalation and change categories.** Some changes are foreseeable: new pay plans, statutory updates, security requirements, and routine maintenance. Where possible, OPM should negotiate pricing for these scenarios upfront, reducing the likelihood that every change becomes a bespoke—and contentious—negotiation.

**Define clear performance requirements with real consequences.** Service level agreements should be precise, measurable, and enforceable. Penalties for missed milestones or degraded performance should be credible, not symbolic, and balanced with incentives for exceeding expectations.

**Protect government ownership of data and derivative code.** Data portability is not a theoretical concern; it is a core safeguard. The government should require that data be maintained in non-proprietary formats and that any code developed outside the vendor's core product be owned by the government or licensed for unrestricted federal reuse.

**Provide an unusually detailed public award justification.** Beyond the legally required debriefings to vendors, OPM should proactively explain its decision to policymakers and the public. Transparency here is not a procedural nicety; it is a strategic investment in legitimacy and durability.

**Do not abandon standards or ecosystems.** A single core system does not obviate the need for enterprise standards or a marketplace of ancillary solutions. These are not “nice to haves.” They are essential to avoiding over-customization, enabling reuse, and ensuring that implementation translates into real operational outcomes.

**Expect friction—and plan for it.** None of these challenges should come as a surprise. Protests, change requests, and ecosystem complexity are predictable features of efforts at this scale. The real risk is not encountering them, but being unprepared when they arrive.

In a future where the Federal HR IT Modernization initiative has failed, critics will likely point to the single-award strategy as evidence of overreach or hubris. That outcome is not inevitable. But avoiding it requires acknowledging, up front, that a single-award approach is not a shortcut around complexity—it is a tradeoff.

Handled with rigor, transparency, and sustained attention to incentives and standards, a single-award strategy could accelerate convergence and deliver long-delayed benefits. Handled casually, it could concentrate risk, magnify failure, and set back federal HR modernization for another generation.

## Failure Mode 2. An OPM-Led, OPM-Managed Effort Becomes a Bottleneck

| “Herding Cats Is Too Hard”

One of the most consequential structural choices in OPM's Federal HR IT Modernization initiative is not technical, contractual, or vendor-related, but institutional: OPM has chosen to lead and manage the effort directly, positioning itself as the central authority for design, procurement, implementation, and ongoing governance. This represents a significant departure from prior federal HR modernization efforts, which largely relied on “anchor-point” agencies—such as USDA's National Finance Center (NFC), the Department of Veterans Affairs, or DOI's Interior Business Center—to drive modernization within a loosely coordinated framework.

The current initiative flips that model. OPM is no longer merely setting policy, certifying providers, or coordinating standards; it is assuming primary responsibility for delivering the core system itself. In theory, this aligns with OPM's statutory role as the federal government's central human capital agency. In practice, it represents a dramatic expansion of OPM's operational remit.

### The Case for an OPM-Led Model

There are strong arguments in favor of centralizing authority at OPM.

**First, it enables greater standardization and consistency.** Agency-led modernization has historically produced uneven results, with agencies interpreting “standards” through the lens of their own legacy systems and mission-specific preferences. A centrally managed effort increases the likelihood that common processes, data definitions, and configurations are actually enforced rather than merely encouraged.

**Second, centralization promises tighter governance.** When authority is diffuse, accountability is as well. An OPM-led model creates clearer lines of decision-making, escalation, and responsibility—particularly important when difficult tradeoffs must be made between agency preferences and enterprise goals.

**Third, it allows OPM to play the role it was intended to play.** For decades, OPM has been criticized for lacking the tools and authority to meaningfully shape federal workforce management. Leading HR IT modernization offers an opportunity to translate policy leadership into operational impact.

**Fourth, it may improve the odds of reaching the intended end state.** Enterprise convergence rarely emerges organically from federated decision-making. A central authority is often required to force alignment, absorb political friction, and maintain focus on outcomes rather than process.

**Finally, this model could work—if OPM engages stakeholder agencies effectively.** Centralization does not have to mean unilateralism. With robust engagement, transparency, and shared governance, an OPM-led approach could combine decisiveness with legitimacy.

These benefits explain why OPM and OMB may reasonably view centralization as a necessary corrective to decades of fragmentation.

### Why This Could Still Go Wrong

The risks, however, are substantial—and familiar to anyone who has watched federal shared services initiatives struggle.

**Does OPM have the programmatic capacity to deliver?** This is the most fundamental question. Managing a government-wide ERP implementation requires deep expertise in program management, systems integration, contracting, change management, and financial operations. Historically, OPM has not operated at this scale. Capacity gaps may manifest in several ways:

- **Resources.** OPM will need significantly more staff—and different kinds of staff—than it has traditionally employed. Specifically, OPM will need people who cannot simply manage technology implementation but who can manage the complexities associated with a multi-agency ERP implementation.
- **Institutional knowledge.** Large ERP programs rely on hard-earned, experiential knowledge that cannot be acquired quickly. And much of this experience is not technology-oriented, but rather focused on program management, communication, and governance.
- **Transparency and credibility.** OPM's track record in managing complex systems transformations is mixed – for instance, OPM's recent implementation of the Postal Service Health Benefits system has been generally successful, while OPM's years-long struggle to modernize its retirements systems has been less so – and skepticism among agencies is real.

**Centralization can become a bottleneck.** If governance processes are not carefully designed, OPM risks becoming the choke point for decisions large and small. Excessive approval layers, unclear escalation paths, or risk-averse decision-making could slow implementation and frustrate agencies accustomed to greater autonomy.

**Agency “skin in the game” is unclear.** When agencies lead their own modernizations, they bear visible responsibility for outcomes. In a centrally managed model, accountability shifts. If the program stumbles, agencies may distance themselves, leaving OPM politically and operationally “holding the bag.” This dynamic can erode buy-in and weaken incentives for agencies to invest time, talent, and political capital in success.

**Contracting capacity is a serious concern.** OPM will be required to manage complex, high-dollar contracts and interagency agreements (IAAs) at a scale far beyond its historical experience. These IAAs will involve intricate service-level agreements, cost allocation mechanisms, and dispute resolution processes. The flow of funds—often described as straightforward in theory—is anything but simple in practice.

Absent deliberate investment, contracting and financial management weaknesses could become systemic vulnerabilities.

## Recommendations: Making Centralization Work

If OPM is to succeed as the central manager of federal HR IT modernization, three interdependent areas demand sustained attention: capacity, governance, and stakeholder engagement.

### Capacity: Building an Organization Fit for Purpose

OPM must treat capacity-building as a first-order priority, not an afterthought.

This will require **significant investment in new staff profiles**—including senior program executives, contracting specialists, financial managers, and enterprise architects—roles that OPM has not historically staffed in large numbers. Borrowing talent through details or temporary assignments may help initially, but long-term success will require durable institutional capability.

OPM should also develop **detailed, model interagency agreements** that clearly anticipate service-level expectations between OPM and its contractor(s), as well as between OPM and customer agencies. These agreements must address not only performance metrics, but escalation procedures, cost transparency, and dispute resolution.

### Governance: Sharing Authority Without Surrendering Control

Centralization does not preclude shared governance. Indeed, it requires it.

OPM should establish **formal partnerships with OMB and other central management offices** to oversee cost, scope, and schedule. In some cases, third-party verification—particularly by OMB—may be necessary to maintain confidence in cost controls and tradeoff decisions.

Bringing **GAO and relevant congressional staff in early** can also be an asset rather than a liability. Early engagement reduces the risk of surprise oversight interventions later and can help align expectations about timelines and risks.

OPM should also leverage **interlocking governance bodies**—such as the CIO Council, CFO Council, and a dedicated President's Management Council (PMC) Deputy Secretary subgroup—to ensure that enterprise perspectives are integrated into decision-making.

Finally, OPM must learn from cautionary tales such as **Interior Business Center's Working Capital Fund governance challenges**, where conflicts of interest and opaque decision-making undermined trust. Transparency and community governance are not optional; they are prerequisites for legitimacy.

### Stakeholder Engagement: Making Agencies Partners, Not Passengers

No amount of central authority can compensate for disengaged agencies.

OPM must place **heavy emphasis on stakeholder engagement and change management**, recognizing that HR systems touch every employee and manager in government. The Chief Human Capital Officers (CHCO) Council should be leveraged aggressively—not merely as a communication channel, but as a genuine forum for surfacing concerns, testing assumptions, and shaping implementation strategy.

OPM may also need something akin to a **"MAESC on steroids"**—a standing, empowered body representing agencies' operational perspectives, capable of providing structured input and feedback throughout the lifecycle of the program. Engagement must be continuous, not episodic. Agencies need to see that their expertise matters, even when their preferences do not prevail.

And finally, OPM should take care to **treat HR 2.0 as a product, not as a project**. The difference lies in realizing that HR 2.0's success relies not simply on the implementation of a new IT system, but on the ongoing evolution of that system in terms of features and functionality that will enable the system to increasingly respond to and meet the needs of agency users. Fortunately, OPM – and its HR Solutions organization in particular – has experience with this model and mindset. Hopefully OPM will apply this with rigor to this initiative.

If the Federal HR IT Modernization initiative fails, it will be tempting to conclude that OPM simply should not have attempted to lead it. That conclusion would be too easy—and likely wrong.

Centralization is not the problem. Under-investment in capacity, governance, and engagement is. An OPM-led, OPM-managed model can succeed—but only if it is treated as the creation of a new enterprise delivery capability, not an incremental extension of existing roles. Herding cats is hard. Pretending that cats will herd themselves is harder still.

## Failure Mode 3. Contracting Directly with OEMs Goes Awry

| “Integrators Were Integral After All”

Among the most structurally ambitious design choices in OPM's Federal HR IT Modernization initiative is the decision to contract directly with an original equipment manufacturer (OEM) for the core human capital management (HCM) system, relegating systems integrators to subcontractor roles. This approach inverts the traditional federal ERP supply chain, in which a prime integrator manages delivery while OEMs provide software licenses, product roadmaps, and limited implementation support.

This shift is consistent with the administration's broader “OneGov” philosophy being led by GSA: simplify vendor relationships, reduce layers of accountability, and align authority with responsibility. It is also a direct response to long-standing frustrations with integrator-led ERP programs, in which product limitations, customization decisions, and delivery failures are often blamed on opaque interactions between vendors and subcontractors.

Under the proposed model, the OEM becomes the prime contractor, responsible not only for the product but for orchestrating delivery across a network of integrator subcontractors. Authority and accountability are meant to flow directly between OPM and the OEM, reducing ambiguity about who owns outcomes.

This model is attractive in theory, but rare in practice at the scale and complexity contemplated here.

### The Case for an OEM-Led Model

The rationale for contracting directly with an OEM is grounded in several legitimate observations about past federal ERP failures.

**First, only the OEM can make binding product commitments.** Integrators can configure systems and build extensions, but they cannot change core product behavior or guarantee future roadmap decisions. When implementation challenges arise from product limitations, integrators are often powerless to resolve them. An OEM-led model aligns responsibility for product evolution with authority over delivery.

**Second, OEM leadership may improve governance of add-on solutions.** Large ERP implementations inevitably require extensions to cover functional gaps. If OEMs are responsible for overall delivery, they may be better positioned—and better incentivized—to govern integrator-built add-ons, ensuring alignment with product standards and long-term maintainability.

**Third, integrators are poorly positioned to enforce enterprise standards.** Systems integrators are responsive to client demands and contractual incentives. They are not natural arbiters of enterprise-wide consistency, particularly when different agencies or program offices pull in different directions. An OEM-led model could, in theory, strengthen adherence to centralized standards.

**Fourth, this approach clarifies lines of authority and accountability.** By establishing a direct OPM–OEM relationship, the government reduces the risk of triangular blame-shifting. If something goes wrong, there is no ambiguity about who is responsible for delivery.

Taken together, these arguments explain why an OEM-led model is appealing—not just ideologically, but operationally.

### Why This Could Still Go Wrong

Despite its appeal, this contracting model introduces a distinct and potentially destabilizing set of risks.

**Are OEMs equipped to play this role?** Most commercial ERP vendors are product companies, not delivery organizations. Their internal structures, incentives, and cultures are optimized for software development and subscription revenue, not for managing sprawling, multi-year, politically sensitive federal implementations. Asking OEMs to serve as primes may stretch them beyond their institutional comfort zone.

In many cases, OEMs may **underestimate the complexity of federal requirements**. Federal HR is not simply “commercial HR plus a few tweaks.” It involves intricate statutory authorities, unique pay systems, labor relations constraints, security requirements, and oversight dynamics. OEMs that overcommit early may struggle to “stick the landing” once implementation realities emerge.

**Capacity is a serious concern.** Even large OEMs may lack sufficient cleared staff, federal acquisition expertise, or program management depth to manage dozens of agencies, multiple integrators, and constant stakeholder engagement simultaneously. Scaling up quickly enough—without sacrificing quality—may prove difficult.

**OEMs have historically avoided direct federal prime contracts for a reason.** Many view direct contracting as entailing disproportionate risk: exposure to protests, congressional scrutiny, shifting requirements, and reputational damage. If OEMs are forced into this role, they may price that risk aggressively. The result could be a significant price premium that is difficult to justify or unwind later.

**Risk may be compounded, not reduced.** By aligning OPM's institutional weaknesses with those of the OEM, this model risks creating a fragile center. OPM may lack deep delivery capacity; OEMs may lack deep federal operational expertise. If both struggle simultaneously, there may be no clear “adult in the room” to stabilize the program.

**The specter of finger-pointing does not disappear—it moves.** Instead of disputes between agencies and integrators, conflicts may arise between OPM and the OEM, or between OEMs and their integrator subs. Without careful governance, the very dynamic this model seeks to avoid could re-emerge in a new form.

## Recommendations: Making the OEM-Led Model Viable

If OPM is committed to this supply chain inversion, several mitigation strategies are essential.

### Rigorous OPM Due Diligence

OPM must go beyond traditional source selection criteria and conduct deep due diligence on OEM readiness. This includes assessing not just product maturity, but delivery capacity, governance models, subcontractor management experience, and willingness to invest in federal-specific capabilities.

Past performance should be evaluated through the lens of **organizational behavior**, not just technical success. How does the OEM handle failure? How does it resolve disputes? How does it balance product purity against client needs?

### Designing OEM Governance as a “Team of Teams”

OEM governance structures must be deliberately designed, not improvised. A useful model is the “team of teams” concept: a networked structure in which multiple integrators, OEM staff, and government stakeholders operate within a shared framework of objectives, standards, and transparency.

In this model, the OEM acts as an orchestrator, not a micromanager. Integrators retain autonomy within defined boundaries. Decision rights are explicit, documented, and enforced. And information flows laterally, not just hierarchically.

This approach requires investment in collaboration tooling, shared metrics, and joint problem-solving forums. Without it, coordination costs will overwhelm any theoretical benefits of centralization.

### Proactively Managing Blame Avoidance

OPM should anticipate conflict and design mechanisms to resolve it constructively. This includes the use of tools and methods such as clear responsibility matrices distinguishing product issues from configuration or data issues, joint risk registers owned by OPM and the OEM, and escalation paths that prioritize resolution over fault-finding.

### Preserving a Curated Marketplace Around the Core

Even with an OEM-led core system, a healthy ecosystem of integrator-built applications and extensions will be necessary. OPM should maintain a marketplace concept—not for core HCM replacement, but for complementary solutions.

Critically, this marketplace should be curated. OPM and the OEM should jointly define certification or validation processes to ensure that extensions align with enterprise standards, security requirements, and architectural principles. This preserves innovation without sacrificing coherence.

In a future where the Federal HR IT Modernization initiative has failed, critics may argue that contracting directly with OEMs was a bridge too far—a well-meaning but impractical experiment in supply chain reform. That outcome is possible, but not inevitable.

An OEM-led model can work. But it requires treating the OEM not as a traditional vendor, but as a quasi-partner embedded in a complex, politically sensitive transformation. It demands unusually strong governance, humility about capacity limits, and constant attention to incentive alignment.

Integrators were integral before for a reason. The challenge now is not to discard their value, but to integrate it differently—without assuming that structural inversion alone solves the hard problems of federal modernization.

## Failure Mode 4. Configuration Management Becomes Unmanageable

| “The Christmas Tree Collapses Under Its Own Weight”

Of all the risks facing OPM's Federal HR IT Modernization initiative, none is more technically subtle—or more existential—than configuration management. If this effort fails, it is entirely plausible that no single procurement decision, vendor choice, or governance body will be blamed. Instead, the postmortem will likely point to something more diffuse and familiar: an enterprise system that slowly accreted so many exceptions, configurations, extensions, and accommodations that it ceased to function as an enterprise system at all.

This is the “Christmas tree” failure mode. The core system begins as something simple and elegant. Over time, ornaments are added—each justified, defensible in isolation. Eventually, the branches sag under their collective weight. Complexity overwhelms coherence. What remains is neither standardized nor flexible, but brittle, expensive, and opaque.

Federal HR is uniquely susceptible to this outcome. The question is not whether configuration pressure will arise, but whether OPM has the governance discipline to withstand it.

### Core Configuration Questions That Must Be Answered

At the heart of this risk lies a deceptively simple problem: **how will configuration decisions be made, by whom, and according to what principles?** Until these questions are answered clearly and consistently, every subsequent decision compounds risk.

#### What Is the Baseline?

The initiative presupposes the existence of a “baseline” or “standard” set of HR processes. But this concept is more slippery than it appears. Federal HR is governed by multiple statutory regimes. Title 5 applies broadly, but Titles 10, 38, 42, and others carve out significant exceptions for specific workforces.

This raises unavoidable questions: Is there a single baseline with overlays, or multiple baselines by title? At what point does a “variant” become a de facto separate implementation? Who arbitrates conflicts between enterprise standardization and statutory uniqueness?

#### When Must Agencies Converge?

One particularly difficult question is, when should agencies be required to abandon unique features or legacy subroutines and converge on the standard—even if doing so is painful?

Every agency can articulate edge cases, mission idiosyncrasies, or historical reasons for divergence. Some of these claims are more legitimate than others. If convergence is always optional, standardization may never occur. If it is mandatory without a clear rationale, resistance will harden. The absence of principled criteria may lead to ad hoc decisions that are impossible to defend consistently.

#### Who Decides—and Who Pays—for Tailoring?

At some level, alterations of the baseline system to meet unique agency needs are inevitable. Agencies will have legitimate reasons to deviate from the baseline, and, as is often said about policies and programs in Washington, “one size does not fit all.” But not all customization is equal. OPM and its partnering agencies can choose different approaches for this type of tailoring, including:

- **Advanced configuration** within the core product
- **Intra-ecosystem extensions** (e.g., Workday Extend–style solutions)
- **Extra-ecosystem integrations** (e.g., ServiceNow or third-party bolt-ons)
- **Core product modifications** negotiated directly with the OEM

Each of these options implies a different profile with respect to cost and risk in the near-term, as well as maintenance and sustainability in the longer-term. OPM should devise explicit guidance on the acceptable hierarchy of tailoring options, as well as whether and/or when agencies will be expected to pay for the tailoring themselves.

### **How Is Reuse Enforced?**

Even when advanced tailoring is approved, a further question arises: **how will OPM ensure that solutions built for one agency can be, and are, reused by others?**

Without reuse requirements, configuration can devolve into another form of fragmentation. Without incentives or mandates for reuse, agencies may have little reason to invest in generalizable solutions.

### **Complexity Is Not Uniform Across Agencies**

It would also be a dangerous simplification to simply assume that agencies can be categorized neatly by size or complexity. Some “agencies” are really holding companies: Departments such as DHS and DOJ resemble federations of semi-autonomous components more than unitary organizations. Many CFO Act agencies operate similarly.

For these entities, implementation is not a single project but a series of sub-implementations—each with distinct labor agreements, authorities, and operational cultures. Configuration decisions that appear manageable at headquarters scale can explode in complexity when applied component by component.

At the same time, the existing Federal Shared Service Providers create an additional level of complexity. Organizations such as NFC, IBC, and HR Connect are components of federal agencies who will be implementing the new system, while also providing deeply intertwined services to multiple customers. Their systems and processes cannot easily be disaggregated so that one component can be swapped out while others remain intact.

Treating these providers as interchangeable “customers” of a new system misunderstands their operational reality. Configuration decisions made for them will have cascading effects across multiple agencies simultaneously.

## **Recommendations: Governing Complexity Without Denying Reality**

### **Configuration Management Is Really About Defining Success**

Many configuration debates are proxy wars over expectations. That is why configuration management cannot be separated from the question of **what success actually means, and when.**

No one likes a new HR system at launch. Early inefficiencies, usability complaints, and productivity dips are normal. Yet federal programs are often judged prematurely against aspirational promises rather than transitional realities. If early user dissatisfaction is treated as evidence that the baseline is “wrong,” pressure to customize will intensify immediately.

In the early phases of modernization, the most meaningful success metrics are not user delight or efficiency gains. They are structural—data interoperability and flow, enterprise visibility into workforce composition and costs, reduction in the number of systems, interfaces, and manual workarounds, and reduction in cyber and operational risk vectors.

These metrics should guide configuration decisions. If a requested customization undermines these outcomes, it should face a high bar—regardless of local preference.

### Sequence for Simplicity

Implementation sequencing matters. Starting with smaller or simpler agencies is not avoidance; it is risk management. Early waves should emphasize convergence, learning, and reuse before tackling complex edge cases.

### Treat Governance as a First-Class Capability

Strong configuration governance requires clear decision rights, consistent funding, and documented rationales for exceptions. This cannot be done on a volunteer basis or through ad hoc councils. It requires dedicated capacity and authority.

### Allow Tailoring—But Only After Convergence

A viable governing philosophy is to **allow agencies to tailor further, on their own dime, only after accepting and implementing the required baseline**. This preserves enterprise coherence while allowing flexibility where it is truly needed.

### Align Modernization With Civil Service Reform

Configuration complexity is not purely technical. It is the downstream effect of decades of policy accretion. Broader civil service reform that consolidates authorities, pay plans, and special titles would make standardization dramatically easier. Short of that, OPM and OMB should work proactively with Congress to explain how statutory exceptions drive cost and risk, and why future proliferation of these specializations should be treated as a tradeoff, not a free good.

### Consider Narrowing Initial Scope

One radical—but defensible—option is to narrow the initial scope to position management, deferring pay and time-and-attendance entirely. This would reduce configuration pressure dramatically and allow the enterprise backbone to mature before tackling the most volatile domains.

### Use Funding as a Governance Lever

Funding is governance. A central funding pool could give OPM leverage to enforce configuration discipline. We will cover this point more fully in the next section of this paper.

### Make Governance Transparent

Transparency is a deterrent. Publishing configuration decisions, exception rationales, and reuse opportunities helps counter the belief—widespread in government—that “everything we do is special.”

### Incentivize Early Participation

Agencies with legitimate, complex needs should be encouraged to participate in early waves. Early involvement confers influence—and responsibility. Late entry should not be a strategy for avoiding convergence.

If the Christmas tree collapses, it will not be because ornaments exist, but because no one decides when to stop adding them. If the Federal HR IT Modernization initiative fails, it will not be because federal HR is inherently too complex. It will be because complexity was accommodated indiscriminately rather than governed deliberately.

## Failure Mode 5. Funding Is Insufficient, Unreliable, or Unsustainable

| “The Passed Hat Drops”

If Federal HR IT Modernization fails, there is a strong chance that the proximate cause will not be technical, contractual, or even managerial. Instead, the failure will be explained in more familiar Washington terms: the money never showed up in the right place, at the right time, or with the right conditions attached.

This risk is the elephant in the room. No amount of sound architecture, capable vendors, or thoughtful governance can overcome a funding model that is fragmented, unpredictable, and politically brittle. In reality, **funding is governance**. The way money flows determines who has power, who bears risk, and who ultimately decides what gets built.

The current approach—effectively “passing the hat” among agencies—risks recreating the dynamics that doomed earlier federal HR modernization efforts.

### The Current Funding Concept: Distributed Responsibility, Diffuse Authority

The apparent plan for this initiative is for agencies to fund their participation individually, either by requesting new funds through the budget process or carving out resources from existing appropriations and financial management pipelines. OPM would then recover costs through its revolving fund, consistent with its shared services role.

### Why This Model Is Attractive

There are real reasons this approach is appealing to OPM, OMB, and appropriators.

First, it works cleanly within the scope of **OPM's revolving fund authority**. No new statutory constructs are required. The legal machinery already exists.

Second, it aligns neatly with the **shared services and SSC model** that has become familiar across government. Agencies “shop” for services, and providers recover costs based on usage.

Third, it preserves **budgetary fidelity and Congressional control**. Funds are still appropriated to agencies, and appropriators retain line-of-sight into how money is spent.

Taken together, these factors make the distributed funding model feel safe and orthodox. However, this approach may also carry significant and underappreciated risks.

Requiring each agency to independently identify, justify, request, and execute funding for a shared enterprise system is inherently messy. Budget cycles are misaligned. Agencies face different fiscal pressures. Internal priorities vary widely. The result could be a great deal of bureaucratic drag. Momentum will slow as agencies negotiate participation timelines, funding profiles, and scope assumptions.

A distributed funding model necessarily produces a proliferation of **interagency agreements, billing arrangements, reconciliations, and cost allocations**. These are not trivial administrative tasks. They consume staff time, invite disputes, and obscure true program costs. Ironically, an initiative intended to reduce fragmentation could create a parallel bureaucracy devoted solely to tracking who owes what to whom.

Moreover, requiring agencies to independently secure funding at the scale this program envisions all but guarantees various forms of “hand-to-hand combat” over agency funding priorities. One can imagine agencies wrangling with Hill appropriators for funding and with OPM and OMB over timelines. Results are likely to be both unpredictable and uneven.

## **An Alternative: Centralized Implementation Funding**

A plausible—and arguably more coherent—alternative would be to **appropriate funds directly to OPM for implementation**, while returning to a revolving fund or shared services model for steady-state operations and maintenance.

This approach would represent a significant departure from recent practice, and it carries its own risks. But it is worth serious consideration precisely because it re-aligns authority with responsibility.

### **Potential Advantages**

Centralized implementation funding would give OPM **real control over configuration and sequencing**. It would also **tamp down nickel-and-dime arguments**. Agencies could focus on adoption and change management rather than negotiating marginal cost shares for every feature or delay.

Importantly, this model reflects a key reality: **there is no true marketplace of choices** in this initiative. Agencies are not choosing among competing HR platforms. They are being asked to converge on a single enterprise solution. In that context, the logic of individual “shopping power” that justifies allocating funding to agencies individually breaks down.

### **Real Tradeoffs**

Centralized funding is not a panacea. It introduces its own challenges. Budget flexibility is reduced. Large appropriations require long lead times and are harder to scale up or down. If OPM becomes a monopoly provider with guaranteed funding, **accountability mechanisms must be explicit rather than market-based**. Congressional skepticism may increase, particularly given OPM's historical capacity constraints.

These are serious concerns—but they are at least visible and governable, unlike the diffuse risks of the “passed hat” model.

A centralized funding model can incentivize the program to standardize early, sequence deliberately, invest in shared infrastructure, and optimize for enterprise outcomes. On the other hand, a distributed funding model may incentivize agencies to delay participation, minimize scope, protect local exceptions, and externalize integration costs.

Neither model eliminates risk. But one may stand a better chance of aligning financial authority with the ambition of a government-wide system.

## **Recommendations: Treat Funding as a Strategic Design Decision**

### **Appropriate Implementation Funding Directly to OPM**

Congress should probably appropriate funds to OPM specifically for the implementation phase, with a clearly articulated plan to transition to a revolving fund model for operations and maintenance. This would strengthen OPM's ability to enforce configuration discipline, reduce transactional friction with agencies, and enable coherent sequencing and reuse. At the same time, safeguards must be built in to mitigate monopoly risks, including clear performance expectations and oversight mechanisms.

### **Partner Early and Aggressively With OMB and Congress**

OPM cannot do this alone. Sustained engagement with OMB and appropriators is essential—not merely to secure funding, but to **explain why traditional funding models are ill-suited to enterprise transformation**. This effort should emphasize the zero-sum nature of agency funding, the false economy of distributed cost recovery, and the long-term savings enabled by early convergence. In addition, this represents another area in which adopting a product mindset vs. a project mindset can be influential in setting this initiative up for success.

### Impose Transparency on Revolving Fund Operations

If agencies are expected to pay through OPM's revolving fund—whether during implementation or steady-state—then transparency is non-negotiable. Along these lines, OPM should commit to clear reporting on what functionality is being added, visibility into cost drivers and tradeoffs, and documentation of configuration and scope decisions. In this way, transparency serves both accountability and legitimacy.

### Secure a Special Appropriation—Even If Late

Finally, realism matters. It is almost certainly too late for FY 2026, and likely too late for FY 2027, to fully fund this effort through regular channels. That argues not for resignation, but for a **deliberate strategy to secure a special appropriation**, paired with a credible governance and accountability framework. Delay without structural change merely compounds risk.

If Federal HR IT Modernization fails, observers will say the program was underfunded. That diagnosis may be true but incomplete. The deeper failure will have been the choice to treat funding as an afterthought rather than as the central mechanism of governance. A program this ambitious cannot be sustained on passed hats and polite persuasion. In enterprise modernization, money does not just pay for outcomes. It decides them.

## Failure Mode 6. Agencies Are Not Ready When Their Turn Comes

| “Agencies Miss Their Marks”

One of the most plausible ways the Federal HR IT Modernization initiative could fail is also one of the least dramatic. There may be no protest, no catastrophic system outage, and no high-profile scandal. Instead, OPM could execute its responsibilities competently—award contracts on time, stand up governance structures, and publish wave schedules—only to discover that agencies are simply not ready to implement when their turn arrives.

This failure mode is especially dangerous because it allows responsibility to diffuse. OPM can credibly claim it “hit its marks,” while agencies can plausibly argue that expectations were unclear, timelines unrealistic, or resources insufficient. The result is not a single point of failure, but a cascading series of delays, scope reductions, and quality compromises that gradually sap confidence in the entire enterprise effort.

### Vague Guidance Produces False Readiness

To date, OPM and OMB guidance on agency preparation has been sparse and, in many cases, aspirational rather than operational. Agencies are encouraged to “prepare,” “clean up data,” and “document processes,” but are rarely told **how much, how good is good enough, or how readiness will be assessed.**

This ambiguity creates a dangerous illusion of readiness. Agencies assume they are “mostly there” until implementation teams arrive and discover otherwise. At that point, options narrow quickly: delay the wave, lower standards, or push forward and absorb the consequences.

Each of these choices has systemic implications. None is cost-free.

### Lessons From Prior Implementations: Preparation Is Not Optional

There is no shortage of empirical evidence demonstrating that readiness matters. Department of Energy’s Workday implementation, among others, illustrates that successful deployments require advance groundwork. DOE invested heavily in data standardization and cleanup well before configuration began, detailed as-is process documentation across the agency, and early organizational change management, among other things. These investments did not eliminate challenges, but they made them manageable. More importantly, they established a shared understanding of what “ready” actually meant. Absent similar clarity at the government-wide level, agencies may default to optimistic self-assessment.

### Data Readiness Is the Central Risk

Among all readiness dimensions, **data quality** is the most consequential and the least forgiving. Agencies vary widely in their HR data maturity. Some maintain relatively clean, standardized records. Others rely on heavily customized legacy systems, manual workarounds, or shadow databases.

This raises critical questions about what level of data cleanup is truly required for implementation to succeed, and which data defects can be corrected post-go-live, and which cannot. OPM will need to establish **standards, metrics, and indicators** that make it possible to distinguish between agencies that are genuinely prepared and those that are not.

These metrics and indicators might include things such as percentage of records meeting defined data quality thresholds, completion of validated as-is process documentation, and demonstrated internal capacity to support implementation.

## Sequencing Must Be Agile and Based Largely on Readiness

Wave-based implementation assumes that agencies can be slotted into a predefined sequence. But if readiness varies widely, then sequencing will need to be adjustable to swap in agencies who are in a better state of readiness for those who are not.

When an agency attempts to implement before it is ready, the consequences are predictable: Configuration decisions are made based on incomplete understanding, data defects propagate into the new system, change fatigue accelerates, and confidence in the system erodes early.

It is tempting to frame readiness as an agency problem rather than an OPM problem. But that framing is incomplete. While agencies are responsible for their own data and processes, **OPM is responsible for defining what readiness means, how it will be measured, and how it will affect program decisions.** Without that clarity, accountability can collapse into mutual recrimination.

## Recommendations: Make Readiness Real

### Define Clear, Objective Readiness Targets

Agencies need clear targets—far more specific than high-level guidance. These targets should be published early and tied explicitly to wave eligibility. Wave schedules should be **benchmarked against readiness**, with the explicit expectation that sequencing may change based on objective criteria.

### Provide Resources Now, Not Later

Readiness work requires resources—staff time, contractor support, and leadership attention. Agencies cannot simply absorb this work on top of existing demands. As soon as the core system award is made, OPM should issue a detailed readiness checklist and planning guidance, allowing agencies to align budgets and staffing immediately.

### Encourage Interim Preparation Activities

Even before award, agencies can and should begin foundational work, including as-is process documentation, current-state requirements definition, and data quality assessments. This work is valuable regardless of final system selection and should be framed as such.

### Establish a Best-in-Class Contract Vehicle

OPM and GSA can jointly establish or identify a **best-in-class contract vehicle** for readiness services, including data cleanup and mapping, functional business process reengineering, organizational change management, and training and enablement. Critically, OPM should retain the ability to review and approve task orders to ensure fidelity to enterprise needs and standards.

Readiness is not a box to be checked. It is a condition to be earned. Without treating it as such, even a well-run program can unravel one unprepared agency at a time. If agencies miss their marks, the modernization effort will not fail loudly. It will fail quietly—through delays, degraded outcomes, and eroding trust. In that scenario, OPM will be blamed for problems it could not fully control, while agencies will insist they were never given clear instructions or adequate support. The tragedy is that this outcome is entirely foreseeable.

## Failure Mode 7. Executive Sponsorship Wanes Over Time

| “Government Takes Its Eye Off the Ball”

One of the most underappreciated achievements of the Federal HR IT Modernization initiative to date has been its ability to attract and sustain unusually high levels of senior attention. In a policy environment where large-scale federal IT efforts often languish in the bureaucratic middle, this initiative has benefited from visible sponsorship at the top of OPM and OMB, and from alignment with broader management and reform priorities of the current administration.

That early success, however, creates a paradox. The initiative's reliance on elevated executive sponsorship is simultaneously one of its greatest strengths and one of its most serious vulnerabilities. If that sponsorship wanes—as it almost certainly will over time—the program risks losing momentum, coherence, and political protection long before it reaches steady state.

Large, enterprise-wide initiatives do not fail because senior leaders lose interest overnight. They fail because attention erodes gradually, often imperceptibly, as other priorities crowd the agenda. Adding to that, the stated timelines for Federal HR IT Modernization have already been widely described as unrealistic. The probability that Federal HR IT Modernization will fully conclude within a single administration is effectively zero. This is not a criticism; it is a recognition of scope and scale. That reality demands a shift in mindset. The question is no longer how to win initial buy-in, but how to engineer staying power over time, including across presidential transitions.

### Strategies for Sustaining Momentum and Sponsorship

If sustained executive sponsorship on a personal level cannot be assumed, it must be **replaced with structural substitutes**. OPM and OMB should explore what elements of this initiative can be codified through formal governance structures, required standards or milestones, and/or integration into existing management frameworks. Structural commitments outlast personal ones.

**Enlisting the Support of Congress.** No enterprise reform of this magnitude can survive without Congressional buy-in. More importantly, that buy-in must be bipartisan. This effort must be framed not as an administration priority, but as a **state-capacity investment**. That framing requires active engagement with both authorizers and appropriators across parties. Absent bipartisan support, the initiative becomes vulnerable to being labeled discretionary, ideological, or expendable.

**Transparency as a Trust-Building Tool.** Radical transparency—about progress, setbacks, costs, and tradeoffs—is essential. OPM must constantly “sell” the initiative, not through hype, but through credible reporting. Transparency reduces the likelihood that future leaders or legislators will view the program as a black box inherited from predecessors.

**Career Leadership Is the Only Stable Backbone.** Political leadership is transient. Career leadership is not. The best chance of survival lies in building a cadre of permanent, empowered SES leaders at OPM and participating agencies who understand the full arc of the initiative and are committed to seeing it through. This requires clear roles and authority, adequate staffing and resources, and institutional incentives aligned with long-term success.

**Funding as a Signal of Commitment.** Multi-year appropriations, where feasible, are among the strongest signals of seriousness. They reduce annual renegotiation risk and insulate the program from short-term political cycles.

**Planning for Leadership Transition and Future Program Phases.** When OPM is ready to admit that the HR 2.0 implementation will take longer than two years, it can also begin setting realistic goals for what will be accomplished in this administration and what the goals should look like in the next administration. Painting a picture of what the likely “wins” will be in future phases may increase the eagerness that future leaders at OPM and OMB show to advance the program.

Executive sponsorship is a wasting asset. Without deliberate efforts to convert attention into durable structures, today's momentum becomes tomorrow's vulnerability. In a program that must outlast administrations, sustainability is not a nice-to-have. It is a central design challenge.

## Conclusion. Governing Risk Without Paralyzing the Program

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A pre-mortem is not an indictment. It is a design tool. The purpose of examining how Federal HR IT Modernization could fail is to identify where institutional reality, rather than technical feasibility, poses the greatest threat—and to adjust course while adjustment is still possible.

Taken together, the failure modes examined in this paper point to a central conclusion: **the risks facing this initiative are not primarily technical. They are governance risks, capacity risks, and incentive-alignment risks.** Addressing them requires more than better requirements or more detailed project plans. It requires a conscious effort to design institutions, funding flows, and oversight mechanisms that help the program succeed rather than simply documenting its shortcomings.

### Rethinking Independent Verification and Validation (IV&V)

Independent Verification and Validation is often invoked reflexively when risk is high. In theory, IV&V provides an objective assessment of progress, quality, and compliance. In practice, it can either clarify decision-making—or overwhelm already strained leadership with yet another stream of findings, red flags, and recommendations.

Traditional IV&V models often emphasize **exhaustive risk identification**. That approach may be appropriate for discrete, bounded systems. It is far less helpful for multi-year, enterprise-scale transformations already operating in a high-risk environment. In this context, IV&V that “piles on” may satisfy oversight requirements while actively undermining execution.

A more useful IV&V strategy would be **selective, staged, and decision-oriented**. Rather than attempting to monitor everything at once, IV&V should focus on a small number of **high-leverage risk domains** aligned with the failure modes identified in this paper, such as configuration governance and convergence discipline, funding adequacy and sustainability, agency readiness and sequencing decisions, and executive sponsorship and institutionalization. Within these domains, IV&V should aim not merely to assess compliance, but to **inform real decisions**: whether to pause, resequence, simplify, or escalate.

Equally important is when IV&V is applied. **Early-stage IV&V** should focus on governance design, capacity, and incentives—not delivery metrics that are not yet meaningful. **Mid-stage IV&V** should assess whether early assumptions are holding and whether course correction is needed. **Later-stage IV&V** can shift toward performance, outcomes, and sustainability.

Applied thoughtfully, IV&V can be a strategic asset rather than an additional burden.

### Leveraging Congress, GAO, OMB, and Other Actors

Likewise, a theme of this paper is that OPM should think carefully about how to leverage its relationship with other actors in the Federal ecosystem, many of whom often play their roles as overseers, authorizers, and advisors. Agencies and program managers often avoid interacting with these players because such interactions seem to invite scrutiny and criticism. But this program, with its size and ambition, will not avoid scrutiny along the way. And engaging these powerful actors earnestly upfront offers OPM the best chance it will have to enlist them as allies and secure longer-term sponsorship for this important effort.

### From Federal HR to Federal Modernization More Broadly

While this paper focuses on OPM and Federal HR IT Modernization, its findings are not unique to that domain. The same failure modes recur across shared services, QSMOs, and enterprise modernization efforts throughout the federal government.

Whether the domain is HR, financial management, acquisition, or IT infrastructure, shared services efforts grapple with familiar challenges—centralization without sufficient capacity, funding models that diffuse authority, agency resistance masked as customization needs, and governance structures that exist on paper but lack teeth.

Federal HR is not an outlier. It is a case study.

## **A Final Observation**

Federal HR IT Modernization is ambitious because it must be. The status quo is unsustainable. Fragmentation, duplication, and opacity carry their own costs and risks in terms of money wasted, missions impeded, and eroded public trust. The choice, then, is not between risk and safety. It is between **managed risk and unmanaged risk**. The failure modes outlined in this paper are not predictions. They are warnings. Each represents a point at which deliberate choices can either compound fragility or build resilience.

The ultimate success of this initiative will depend less on technical execution than on whether its leaders are willing to confront these choices honestly, early, and repeatedly. That, more than any single procurement or platform decision, will determine whether Federal HR IT Modernization becomes a foundation for future reform—or another cautionary tale.

## Appendix. Turning This into an Operational Risk Management Framework

This pre-mortem provides a thoughtful discussion of potential failure modes, the pros and cons of decisions that OPM and OMB have already undertaken, and tangible recommendations for actions that can be taken now. This appendix translates this into an operational risk management framework that OPM, OMB, and agencies can use to guide near and medium-term planning decisions.

### Failure Mode 1. Single-Award Strategy Backfires

Concentrating the core HCM implementation in a single award simplifies execution but increases lock-in, political risk, and long-term rigidity if not carefully governed.

RISK (IF...THEN...)	MITIGATION ACTIONS
IF A SINGLE VENDOR BECOMES DEEPLY ENTRENCHED, THEN SWITCHING COSTS BECOME PROHIBITIVE AND LONG-TERM LEVERAGE OVER PRICE, PACE, AND QUALITY IS REDUCED.	BAKE STRONG PERFORMANCE INCENTIVES, PENALTIES, AND EXIT PROVISIONS INTO TASK ORDERS; ENFORCE DATA PORTABILITY AND IP PROTECTIONS.
IF THE AWARD DECISION IS PERCEIVED AS POLITICIZED, THEN TRUST FROM INDUSTRY, CONGRESS, AND AGENCIES ERODES.	PROVIDE UNUSUALLY DETAILED, PUBLIC AWARD JUSTIFICATION AND DEBRIEFS TO VENDORS, POLICYMAKERS, AND OVERSIGHT BODIES.
IF REQUIREMENTS ARE UNDER-SPECIFIED IN A FIRM FIXED-PRICE ENVIRONMENT, THEN CHANGE ORDERS PROLIFERATE AND COSTS ESCALATE.	PRE-NEGOTIATE AND PRICE FORESEEABLE CHANGE SCENARIOS (E.G., NEW PAY PLANS, STATUTORY CHANGES, MAINTENANCE).
IF COMPETITION PRESSURE DISAPPEARS POST-AWARD, THEN INNOVATION SLOWS AND COMPLACENCY INCREASES.	EMBED INNOVATION INCENTIVES INTO TASK ORDERS AND MAINTAIN A PARALLEL MARKETPLACE FOR ANCILLARY SOLUTIONS.
IF STANDARDS DEVELOPMENT IS DEPRIORITIZED, THEN AGENCY CONVERGENCE AND INTEROPERABILITY FAIL.	CONTINUE TO INVEST IN STANDARDS GOVERNANCE INDEPENDENT OF THE CORE SYSTEM IMPLEMENTATION.
IF "IMPLEMENTATION" IS MISTAKEN FOR "OUTCOMES," THEN MISSION VALUE IS NEVER FULLY REALIZED.	MAINTAIN A CURATED MARKETPLACE FOR WRAP-AROUND SOLUTIONS AND INTEGRATIONS ALIGNED TO ENTERPRISE STANDARDS.

## Failure Mode 2. OPM-Led / OPM-Managed Model Overreaches

Centralizing authority at OPM improves consistency but risks overwhelming OPM's institutional capacity and creating new bottlenecks.

RISK (IF...THEN...)	MITIGATION ACTIONS
IF OPM LACKS SUFFICIENT PROGRAMMATIC CAPACITY, THEN EXECUTION QUALITY AND CREDIBILITY SUFFER.	INVEST EARLY IN STAFFING, SKILLS, AND OPERATIONAL CAPACITY ALIGNED TO MANAGING A LARGE SHARED-SERVICES ENTERPRISE.
IF IAAS ARE POORLY DESIGNED OR MANAGED, THEN COST DISPUTES AND EXECUTION DELAYS MULTIPLY.	DEVELOP STANDARDIZED, MODEL IAAS WITH EXPLICIT SLAS, FINANCIAL FLOWS, AND PERFORMANCE EXPECTATIONS.
IF TRANSPARENCY IS INSUFFICIENT, THEN TRUST FROM AGENCIES, OMB, GAO, AND CONGRESS ERODES.	COMMIT TO HIGH LEVELS OF FINANCIAL, TECHNICAL, AND GOVERNANCE TRANSPARENCY FROM THE OUTSET.  ENGAGE OMB, GAO, AND OTHER STAKEHOLDERS TO SUPPORT GOVERNANCE AND BUILD ADVOCACY.
IF GOVERNANCE IS CENTRALIZED WITHOUT CLEAR DECISION RIGHTS, THEN PROCESSES SLOW, AND DISPUTES ESCALATE, AND OPM RISKS BECOMING A BOTTLENECK.	ESTABLISH CLEAR, TIERED GOVERNANCE WITH DEFINED AUTHORITIES, ESCALATION PATHS, AND DECISION TIMELINES.
IF AGENCIES LACK "SKIN IN THE GAME," THEN ADOPTION AND COOPERATION WEAKEN.	STRUCTURE FUNDING, GOVERNANCE ROLES, AND WAVE SEQUENCING TO ENSURE AGENCY ACCOUNTABILITY AND OWNERSHIP.  ENGAGE CXO COUNCILS AND AGENCY REPRESENTATIVES TO BUILT TRUST AND SUPPORT.

## Failure Mode 3. OEM-Led Supply Chain Model Breaks Down

Contracting directly with the OEM realigns accountability but may overload vendors unaccustomed to federal-scale delivery and governance.

RISK (IF...THEN...)	MITIGATION ACTIONS
IF OEMS LACK CAPACITY TO MANAGE INTEGRATOR ECOSYSTEMS, THEN DELIVERY QUALITY DEGRADES.	CONDUCT RIGOROUS OEM DUE DILIGENCE AND REQUIRE ROBUST PARTNER-MANAGEMENT GOVERNANCE MODELS.
IF OEMS UNDERESTIMATE FEDERAL COMPLEXITY, THEN SCHEDULES SLIP AND COSTS RISE.	STRESS-TEST OEM ASSUMPTIONS AND STAFFING PLANS DURING SOURCE SELECTION AND EARLY EXECUTION.
IF OEM AND OPM WEAKNESSES COMPOUND EACH OTHER, THEN RISK IS AMPLIFIED RATHER THAN REDUCED.	ESTABLISH SHARED GOVERNANCE STRUCTURES ("TEAM OF TEAMS") WITH CLEAR ACCOUNTABILITY AND ESCALATION.
IF INTEGRATOR ROLES ARE UNCLEAR, THEN FINGER-POINTING REPLACES PROBLEM-SOLVING.	DEFINE ROLES, RESPONSIBILITIES, AND DISPUTE-RESOLUTION MECHANISMS CONTRACTUALLY AND OPERATIONALLY.
IF ADD-ON SOLUTIONS PROLIFERATE WITHOUT OVERSIGHT, THEN FRAGMENTATION REEMERGES.	MAINTAIN A CURATED, CERTIFIED MARKETPLACE FOR INTEGRATOR-BUILT EXTENSIONS ALIGNED TO STANDARDS.

## Failure Mode 4. Configuration Management Becomes Unmanageable

Unchecked tailoring and exception-handling overwhelm governance, erode standardization, and recreate legacy fragmentation.

RISK (IF...THEN...)	MITIGATION ACTIONS
IF BASELINE PROCESSES ARE POORLY DEFINED, THEN EVERY AGENCY CLAIMS UNIQUENESS.	CLEARLY DEFINE AND ENFORCE BASELINE PROCESSES, DIFFERENTIATED ONLY WHERE ABSOLUTELY NECESSARY OR LEGALLY REQUIRED.
IF ADVANCED TAILORING LACKS STRONG GOVERNANCE, THEN COSTS, COMPLEXITY, AND DIVERGENCE MAY EXPLODE.	ESTABLISH EXPLICIT THRESHOLDS, DECISION RIGHTS, APPROVAL PROCESSES, AND FUNDING RULES FOR TAILORING.
IF COMPLEX AGENCIES ARE TREATED AS SIMPLE IMPLEMENTATIONS, THEN IMPLEMENTATION FAILURES MAY OCCUR AND/OR CASCADE.	SEQUENCE IMPLEMENTATIONS STRATEGICALLY, STARTING WITH SIMPLER AGENCIES TO ESTABLISH GUARDRAILS.
IF CUSTOMIZATION DECISIONS IGNORE ENTERPRISE OUTCOMES, THEN LOCAL OPTIMIZATION UNDERMINES SYSTEM VALUE.	USE ENTERPRISE METRICS (INTEROPERABILITY, SYSTEM REDUCTION, VISIBILITY) TO GUIDE CONFIGURATION DECISIONS.  USE TRANSPARENCY TO ENSURE ALL AGENCIES HAVE LINE OF SIGHT TO CONFIGURATION DECISIONS, EXCEPTION RATIONALES, AND REUSE OPPORTUNITIES.
IF FUNDING IS FRAGMENTED, THEN GOVERNANCE AUTHORITY MAY BE DIFFICULT OR IMPOSSIBLE TO MAINTAIN.	USE CENTRALIZED FUNDING MECHANISMS TO REINFORCE CONFIGURATION DISCIPLINE.
IF CIVIL SERVICE COMPLEXITY REMAINS UNCHECKED, THEN STANDARDIZATION REMAINS ELUSIVE.	PAIR IT MODERNIZATION WITH BROADER CIVIL SERVICE REFORM DISCUSSIONS WITH OMB AND CONGRESS.

## Failure Mode 5. Funding Is Insufficient, Unreliable, or Unsustainable

“Passing the hat” among agencies creates friction, delays, and weak governance leverage.

RISK (IF...THEN...)	MITIGATION ACTIONS
IF FUNDING DEPENDS ON AGENCY-BY-AGENCY CONTRIBUTIONS, THEN IMPLEMENTATION SLOWS AND DISPUTES MULTIPLY.	SECURE A DEDICATED APPROPRIATION FOR IMPLEMENTATION, TRANSITIONING TO REVOLVING FUNDS FOR O&M.
IF FUNDING FLOWS ARE OPAQUE, THEN TRUST AND ACCOUNTABILITY ERODE.	IMPOSE STRONG TRANSPARENCY AND REPORTING REQUIREMENTS ON REVOLVING FUND USAGE.
IF OPM OPERATES AS A MONOPOLY WITHOUT OVERSIGHT, THEN ACCOUNTABILITY WEAKENS AND CUSTOMER/AGENCY SATISFACTION DECLINES.	PAIR CENTRALIZED FUNDING WITH ENHANCED OMB, GAO, AND CONGRESSIONAL OVERSIGHT.
IF BUDGETING TIMELINES LAG PROGRAM NEEDS, THEN MOMENTUM IS LOST.	PLAN MULTI-YEAR FUNDING STRATEGIES ALIGNED WITH PROGRAM MILESTONES.

## Failure Mode 6. Agencies Are Not Ready When Their Turn Comes

Agency unpreparedness quietly undermines execution even when central program management performs well.

RISK (IF...THEN...)	MITIGATION ACTIONS
IF AGENCIES LACK DATA READINESS, THEN IMPLEMENTATIONS STALL OR FAIL.	DEFINE EXPLICIT DATA QUALITY STANDARDS AND READINESS THRESHOLDS.
IF READINESS CRITERIA ARE VAGUE, THEN SEQUENCING DECISIONS BECOME POLITICAL.	ESTABLISH OBJECTIVE READINESS METRICS AND LINK THEM TO WAVE ELIGIBILITY.
IF AGENCIES IMPLEMENT BEFORE THEY ARE READY, OUTCOME QUALITY DECLINES AND CONFIDENCE IN THE SYSTEM ERODES EARLY.	ALLOW RESEQUENCING BASED ON READINESS; PRIORITIZE PREPAREDNESS OVER SCHEDULE RIGIDITY.
IF AGENCIES LACK RESOURCES TO PREPARE, THEN READINESS GAPS PERSIST.	PROVIDE EARLY FUNDING, TOOLS, AND GUIDANCE FOR AGENCY PREPARATION.
IF PREPARATION WORK IS UNCOORDINATED, THEN EFFORT IS DUPLICATED OR MISALIGNED.	CREATE MANDATORY BEST-IN-CLASS CONTRACT VEHICLES FOR DATA CLEANUP, BPR, AND OCM.

## Failure Mode 7. Executive Sponsorship Wanes Over Time

Without institutionalization, early momentum fades as leadership and priorities change.

RISK (IF...THEN...)	MITIGATION ACTIONS
IF SENIOR ATTENTION DECLINES, THEN GOVERNANCE AUTHORITY WEAKENS.	CODIFY GOVERNANCE STRUCTURES AND DECISION RIGHTS BEYOND INDIVIDUAL LEADERS.
IF LEADERSHIP TURNS OVER, THEN PRIORITIES SHIFT OR STALL.	BUILD A PERMANENT SES CADRE RESPONSIBLE FOR LONG-TERM CONTINUITY.
IF THE PROGRAM SPANS ADMINISTRATIONS WITHOUT PROTECTION, THEN IT BECOMES VULNERABLE.	SECURE BIPARTISAN CONGRESSIONAL SUPPORT AND MULTI-YEAR APPROPRIATIONS.
IF PROGRESS IS OPAQUE, THEN CREDIBILITY ERODES.	PRACTICE RADICAL TRANSPARENCY IN REPORTING PROGRESS, RISKS, AND TRADEOFFS.
IF EARLY WINS ARE NOT LOCKED IN, THEN REVERSAL BECOMES EASY.	MOVE QUICKLY TO ESTABLISH DURABLE STANDARDS, CONTRACTS, AND FUNDING MECHANISMS.



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