

Forty Claims, Checked: A Pentagon Inspector General Report, Traced Sentence By Sentence To The Documents It Cites

Prepared for public release

SAMPLE REPORT. This report demonstrates the RSC Standard's verification method on a real, published federal document: no client engagement, no privileged access. RSC did not write the report under check and has no relationship to its authors. Every figure traces to the DoD Inspector General's published report or to one of the eight primary DoD records it cites, each archived and fingerprinted. Interest disclosure: RSC is an evaluation and verification firm; this is a demonstration of our checking method, not a comment on the Inspector General's competence or on the CDAO's performance. A real engagement applies this same check to any published report, brief, or claim a client needs to trust before acting on it.

TARGET

DoD OIG Report DODIG-2025-039, "Evaluation of the Effectiveness of the Chief Digital and Artificial Intelligence Office's Artificial Intelligence Governance and Acquisition Process" (CDAO), released November 14, 2024

CHECKED AGAINST

8 primary DoD records, archived and fingerprinted

METHOD

sentence pull, written selection rule, two-reader check, program-verified quotations

PREPARED BY

Rojas Strategic Consulting LLC

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Published by RSC as a public sample. Every claim, count and page reference in this report is drawn from the DoD Inspector General's published report and the eight primary DoD records it cites, archived and fingerprinted; the format, the checks and the standard are the ones a real engagement receives.

BOTTOM LINE

RSC FOR PUBLIC RELEASE

THE QUESTION YOU ASKED

Can you trust what a government report says, and how would you check for yourself?

OUR ANSWER

Yes, mostly, with two limits. 13 of the 40 checked claims are exactly right, 6 were right when written and have since changed, 12 are right in general but wrong on one detail, and 9 can only be settled by paperwork that isn't public. The same check works on any report, so a reader never has to find the gap the hard way.

WHAT WE RECOMMEND YOU DO

1. **Put a date on every status claim, then recheck it in 30 days.**

The signing office runs it; one re-read, about 30 minutes on a typical report.

2. **Name the source document and its date next to every fact.**

The drafting author writes the citation into the sentence; the editor holds the line.

3. **Label any claim that only internal records can settle.**

The drafting author applies the label at the sentence or footnote level.

THE FINDINGS, IN PLAIN TERMS

Most of the report's claims hold up; the rest need a caveat, not a rewrite. HIGH

13 of the 40 claims check out exactly as written, 6 changed since, 12 are right in general but wrong on one detail, and 9 rest on paperwork that isn't public. The chart and the detail: page 3

The rule this report called overdue took effect four days after it went out. HIGH

DoD's chartering directive was more than two years overdue when checked in June 2024. It took effect four days after the report published, closing the very gap it reported. The chart and the detail: page 4

A dozen claims are right in general and wrong in a detail. MODERATE

12 of the 40 claims are right in general but wrong on one detail, like a memo date the report gets wrong about itself. The chart and the detail: page 5

9 claims can't be checked, and this report says so instead of guessing. HIGH

9 of the 40 claims trace only to an interview or an internal record that was never made public, so the honest answer is "can't tell," not a guess. The chart and the detail: page 6

Grade and verdict are two different questions, and both matter. HIGH

Every claim carries two ratings: whether it holds up, and how sure the check is. 15 rate HIGH, 15 MODERATE, 10 LOW, and three verified claims still land in the middle. The chart and the detail: page 7

The rest of the file: recommendations, page 23 · data tables, page 8 · analytic basis, page 25 · how we did this, page 27 · the assumptions this report leans on, page 28.

Most of the report's claims hold up; the rest need a caveat, not a rewrite

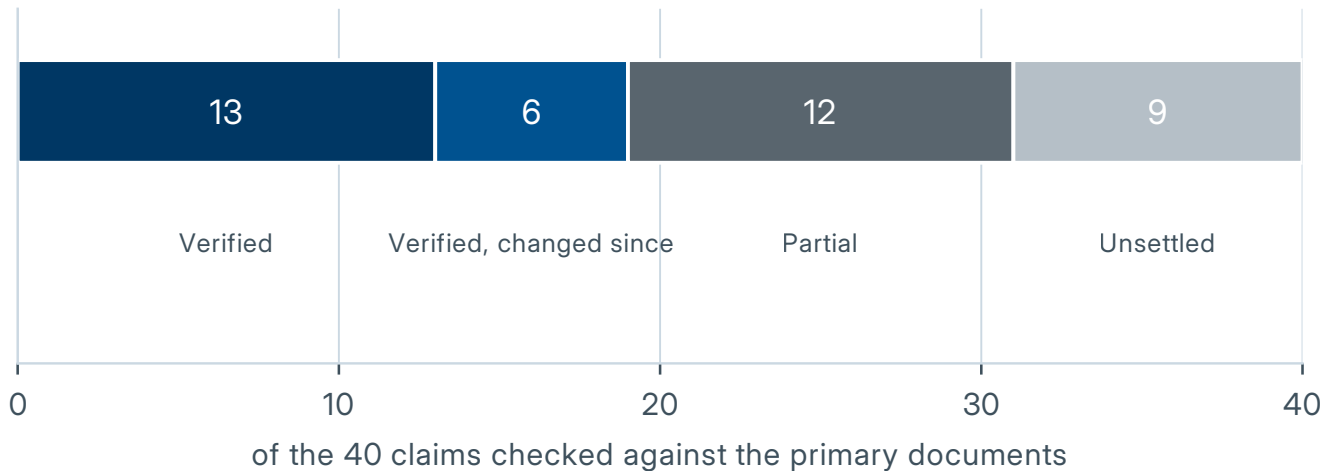


Figure 1. Forty claims checked against the primary documents, in four groups: 13 verified outright, 6 verified as stated but changed since, 12 partial, 9 unsettled. This build re-derives every one of these four counts from the verdict record.

The failures here are mostly small, named details, not large, fabricated claims.

Where the record and the report disagree, it is almost never that the report states something with no basis in the source: it is a fourth name a memo never lists, a word like "plan" where the strategy asks for "guidance," a status the audited office formally disputed in its own printed reply. The numbers: 30 of the 40 claims (75 percent) stand as stated in some form, and the 12 that do not (Finding 03) are each wrong in one named detail, never in the whole claim.

The full breakdown behind this is in the data tables on page 8.

Analytic basis for this finding (alternatives considered, and what would change it): page 25.

The rule this report called overdue took effect four days after it went out



Figure 2. Five dated events from three of the primary records: the February 1, 2022 memo setting a chartering-directive deadline; the June 1, 2022 deadline itself; the report's own June 2024 checkpoint; the report's November 14, 2024 release; and the directive's November 18, 2024 effective date, four days later.

A finding can be true when it is written and out of date when it is read.

The report's own status claim was accurate on the day it was checked: the directive genuinely was not yet in force in June 2024. The gap is not an error in the report; it is the ordinary distance between when a fact is checked and when a reader opens the document. The numbers: the deadline was June 1, 2022; the report's checkpoint was June 2024, over two years later; the report published November 14, 2024; the directive took effect November 18, 2024, four calendar days after that.

The full breakdown behind this is in the data tables on page 8.

Analytic basis for this finding (alternatives considered, and what would change it): page 25.

FINDING 03

WHERE THEY DISAGREE · RSC FOR PUBLIC RELEASE

MODERATE CONFIDENCE

A dozen claims are right in general and wrong in a detail

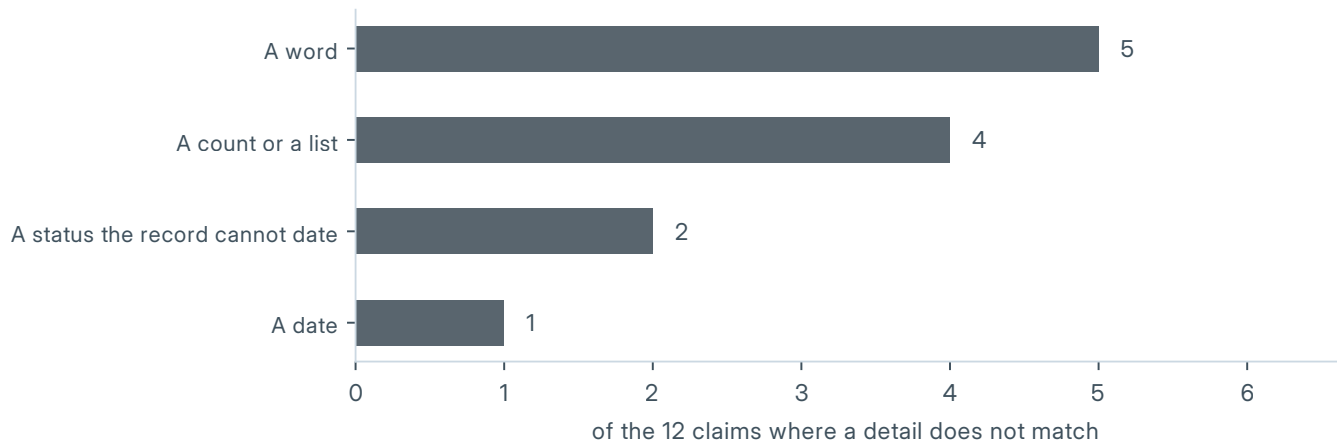


Figure 3. The 12 disagreements, grouped by the kind of detail that does not match: 5 turn on a single word, 4 on a count or a list, 2 on a status no readable document can place in time, and 1 on a date. Two examples: the report's own appendix dates the founding memo December 1, 2021, three separate times elsewhere in the same report (and the memo itself) it is dated December 8; and the report counts four merged offices where the memo it cites names three.

One of the twelve is the report disagreeing with itself.

The clearest case needs no outside source at all: the report's own appendix states the founding CDAO memo is dated December 1, 2021, while the report's Highlights section, its Background section, and the memo it is citing all say December 8. Most of the other eleven follow the same shape: a specific number, name, or word that a cited document does not carry, sitting inside an otherwise accurate sentence.

The full breakdown behind this is in the data tables on page 9.

Analytic basis for this finding (alternatives considered, and what would change it): page 26.

FINDING 04

WHAT CAN'T BE SETTLED · RSC FOR PUBLIC RELEASE

HIGH CONFIDENCE

9 claims can't be checked, and this report says so instead of guessing

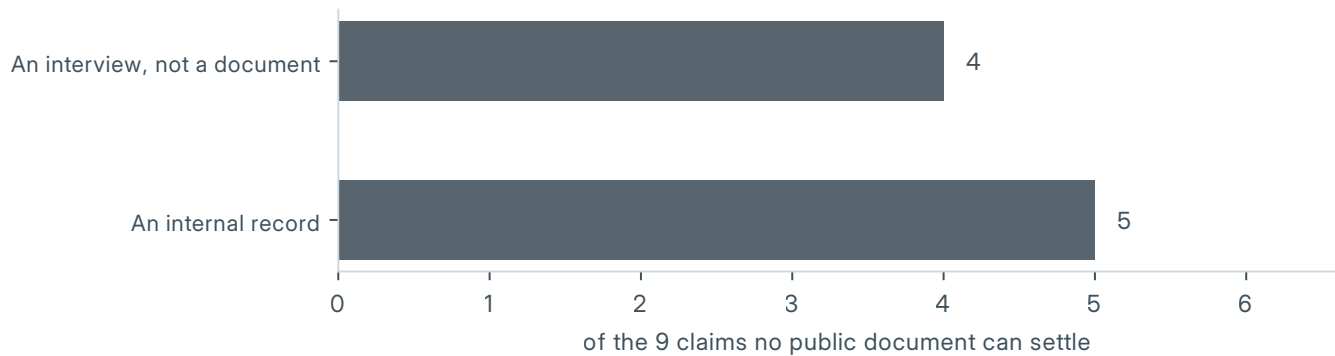


Figure 4. The 9 unsettled claims, by reason: 4 rest on an interview rather than a document, and 5 rest on an internal record outside the public set.

"We can't tell" is a finding, not a gap in the finding.

Every one of these nine claims is genuinely checkable in principle; the documents that would settle them are simply not public. Two examples: the report states a transfer memorandum moved two DoD data-sharing instructions to the CDAO on a specific date, and that memorandum is not in this document set; the report states CDAO officials told auditors a draft plan had been internally reviewed by a specific month, and that statement traces only to the interview itself. Marking these unsettled rather than guessing at a verdict is the discipline this method is built to enforce.

The full breakdown behind this is in the data tables on page 10.

Analytic basis for this finding (alternatives considered, and what would change it): page 26.

Grade and verdict are two different questions, and both matter

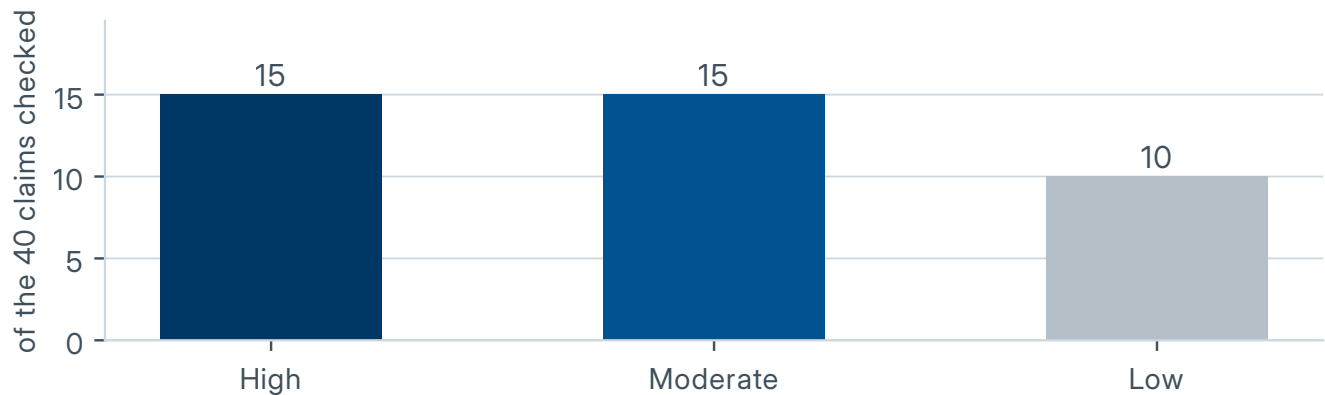


Figure 5. Confidence grade across the 40 claims checked: 15 High, 15 Moderate, 10 Low. Grade describes the strength of the evidence behind the verdict, never the size of the finding: a verified claim can carry the middle grade, and an unsettled claim can still carry the top grade as a statement about what the record does not contain.

Grade and verdict are two different questions.

A claim's grade answers how sure the check is, not whether the claim held up. All 3 of the verified-but-Moderate claims illustrate this directly: one is verified against a memo that survives only as a scanned image, read by eye rather than machine-checked text, so the match is certain but the reading carries a person's transcription in the middle; the others were verified only after a first reading was challenged and revised. Every one of the nine unsettled claims carries the lowest grade by construction, since "no document settles this" is itself the least certain thing a check can report.

The full breakdown behind this is in the data tables on page 10.

Analytic basis for this finding (alternatives considered, and what would change it): page 26.

The numbers behind the findings

EXHIBIT 1

Claims checked, by primary record

RECORD	CLAIMS CHECKED	VERIFIED	VERIFIED, CHANGED SINCE	PARTIAL	UNSETTLED
The December 2021 CDAO memo	6	2	0	3	1
The February 2022 CDAO memo	10	0	4	4	2
The Responsible AI strategy	1	0	0	1	0
The 2023 AI Adoption Strategy	13	6	1	3	3
DoD Instructions 8320.02 and 8320.07	3	2	0	0	1
The OIG's own report page	5	3	0	0	2
DoD Directive 5105.89	2	0	1	1	0
All eight primary records	40	13	6	12	9

Source and notes: the sources page, page 20.

EXHIBIT 2

The five-date record

DATE	EVENT	PRIMARY RECORD
Feb 1, 2022	CDAO memo sets a chartering-directive deadline	The Feb 2022 memo
Jun 1, 2022	That deadline arrives	The Feb 2022 memo
Jun 2024	The report's own checkpoint: the directive still undone	The report itself
Nov 14, 2024	The report is released	The OIG's report page
Nov 18, 2024	DoD Directive 5105.89 takes effect	DoD Directive 5105.89

Source and notes: the sources page, page 20.

EXHIBIT 3

The 12 claims where a detail does not match

CLAIM	THE REPORT SAYS	WHAT THE SOURCE SAYS
The four organizations merged and the CDAO reached initial...	reaching initial operational status by February 1, 2022	Dec 8 memo: JAIC = "successor" (absorbed); DDS kept separate under CDAO...
The DoD's 2023 Data, Analytics, and AI Adoption Strategy required the...	as of June 2024, the implementation plan was still in draft...	Strategy requires "implementation guidance," not a "plan"; CDAO's own...
Recommendation 1a directs the CDAO to finalize and publish an...	Finalize and publish an implementation plan as required by...	a. Complete and publish an implementation plan as required by the DoD's
Standing up the CDAO consolidated four previously separate...	consolidated the roles and responsibilities of four...	Memo lists exactly three related offices (JAIC, DDS, CDO); ADVANA appears...
The CDAO declared it reached initial operational capability on this...	The CDAO declared that it had reached initial operational...	DepSecDef directed CDAO have IOC "by" Feb 1, 2022; IOC was conferred...
The CDAO issued its...	In June 2022, the CDAO issued the...	Title page dates the strategy June 2022; body pages are image-only...
CDAO is developing DoD AI strategy through two documents: the AI...	AI Adoption Strategy (published November 2023)	(a read receipt of the DoD/war.gov news release page for the strategy) states...
A February 1, 2022 DepSecDef memorandum required the CDAO and...	The February 1, 2022 DepSecDef memorandum required that the...	will prepare by June 1, 2022, a chartering directive for my approval, based...
The February 1, 2022 DepSecDef memorandum stated the CDAO is...	the February 1, 2022 DepSecDef memorandum stated that the...	create enabling digital infrastructure and
CDAO was formed in February 2022 by consolidating four prior...	consolidation of the four prior organizations (ADVANA, CDO...	CDAO effective Feb 1, 2022; related to JAIC, DDS, CDO only , ADVANA absent.
The current draft DoDD 5105.UW ("Chief Digital and AI Officer") and...	in their current draft form only incorporate or cancel 6 of...	Final DoDD 5105.89 lists 5 incorporated/ canceled documents; DoDI 8410.dd is...
The OIG evaluated the December 1, 2021 and February 1, 2022 DepSecDef...	We evaluated the December 1, 2021 and February 1, 2022...	We evaluated the December 1, 2021 and February 1, 2022 DepSecDef memorandums...

Source and notes: the sources page, page 20.

EXHIBIT 4

The 9 claims and why they can't be settled

CLAIM	WHY
The AI policy is being developed as a DoD chartering directive numbered DoD...	An internal record
The Implementation Guidance was distributed by email on March 12, 2023 to a...	An internal record
As of June 2024 the AI Adoption Strategy implementation plan was still in...	An interview, not a document
The chartering directive was delayed because of the significant amount of...	An interview, not a document
The Chief Digital and AI Officer approved the AI Adoption Strategy in 2023.	An interview, not a document
As of March 2024, a draft version of the implementation plan had been...	An interview, not a document
The CDAO has coordinated with the DoD Chief Information Office (CIO) to...	An internal record
On March 13, 2024, during the evaluation, the CDAO took ownership of two...	An internal record
The evaluation identified over 60 authoritative documents (legal issuances...	An internal record

Source and notes: the sources page, page 20.

EXHIBIT 5

Confidence grade, by verdict

VERDICT	HIGH	MODERATE	LOW
Verified	10	3	0
Verified, changed since	5	1	0
Partial	0	11	1
Unsettled	0	0	9
All 40	15	15	10

Source and notes: the sources page, page 20.

EXHIBIT 6

Claims checked against the December 2021 CDAO memo

THE CLAIM CHECKED	WHAT THE RECORD SAYS
On December 8, 2021 the Deputy Secretary of Defense issued the memorandum establishing the Chief Digital and AI Officer position Status: Verified · Confidence: Moderate	The report says: On December 8, 2021, the Deputy Secretary of Defense issued a memorandum titled "Establishment of the Chief Digital and Artificial Intelligence Officer" The source says: Memo dateline "DEC - 8 2021" and subject line name the CDAO's establishment.
Standing up the CDAO consolidated four previously separate organizations: ADVANA, the DoD Chief Data Officer, Defense Digital Service, and the Joint AI Center. Status: Partial · Confidence: Moderate	The report says: consolidated the roles and responsibilities of four previously distinct organizations: • Office of Advancing Analytics (ADVANA), • DoD Chief Data Officer (CDO), • Defense Digital Service (DDS), and • Joint AI Center (JAIC). The source says: Memo lists exactly three related offices (JAIC, DDS, CDO); ADVANA appears nowhere in it.
That FY2019 NDAA section assigned the JAIC to develop a detailed strategic plan and roadmap for transitioning AI technologies into operational use, and to continuously evaluate and adapt relevant AI capabilities. Status: Verified · Confidence: Moderate	The report says: The National Defense Authorization Act for FY 2019 assigned the JAIC as the organization responsible for developing a detailed strategic plan and roadmap to transition AI technologies into operational use and mandating the... The source says: Section 238 requires a detailed strategic plan, a roadmap, and continuous evaluation/adaptation of AI capabilities.
CDAO was formed in February 2022 by consolidating four prior organizations: ADVANA, CDO, DDS, and JAIC. Status: Partial · Confidence: Moderate	The report says: consolidation of the four prior organizations (ADVANA, CDO, DDS, and JAIC) into the CDAO in February 2022 The source says: CDAO effective Feb 1, 2022; related to JAIC, DDS, CDO only , ADVANA absent.
The evaluation identified over 60 authoritative documents (legal issuances, directives, directive-type memorandums, strategic guidance) still assigned to the four prior organizations as current owner. Status: Unsettled · Confidence: Low	The report says: We identified over 60 authoritative documents still assigned to these four organizations The source says: Only the OIG report's own fieldwork/review produced this "over 60 documents" figure.
The OIG evaluated the December 1, 2021 and February 1, 2022 DepSecDef memorandums assigning responsibilities to the CDAO. Status: Partial · Confidence: Moderate	The report says: We evaluated the December 1, 2021 and February 1, 2022 DepSecDef memorandums assigning responsibilities to the CDAO The source says: We evaluated the December 1, 2021 and February 1, 2022 DepSecDef memorandums assigning responsibilities to the CDAO.

Source and notes: the sources page, page 20.

EXHIBIT 7

Claims checked against the February 2022 CDAO memo (1 of 2)

THE CLAIM CHECKED	WHAT THE RECORD SAYS
The four organizations merged and the CDAO reached initial operational status by February 1, 2022 Status: Partial · Confidence: Moderate	The report says: reaching initial operational status by February 1, 2022 The source says: Dec 8 memo: JAIC = "successor" (absorbed); DDS kept separate under CDAO supervision; CDO stays operationally aligned but reports elsewhere , not a merger of all four.
The AI policy is being developed as a DoD chartering directive numbered DoD Directive 5105.UW with an accompanying DoD Instruction 8410.dd Status: Unsettled · Confidence: Low	The report says: a DoD chartering directive (DoD Directive 5105.UW) and accompanying DoD Instruction (DoD Instruction 8410.dd) The source says: Only the OIG report's own fieldwork/interviews carry these specific draft numbers; no primary document does.
The CDAO declared it reached initial operational capability on this date. Status: Partial · Confidence: Moderate	The report says: The CDAO declared that it had reached initial operational capability on February 1, 2022. The source says: DepSecDef directed CDAO have IOC "by" Feb 1, 2022; IOC was conferred automatically upon stand-up, not by a CDAO declaration.
The DoD chartering directive and DoDI meant to define CDAO's roles are overdue, so the CDAO's roles and, as a result, responsibilities are not clearly defined to DoD stakeholders. Status: Verified, changed since · Confidence: Moderate	The report says: however, these are overdue and the CDAO's roles and, as a result, responsibilities are not clearly defined to DoD stakeholders. The source says: DepSecDef's Feb 2022 memo set a June 1, 2022 deadline for the CDAO chartering directive; not issued until Nov 2024.
A February 1, 2022 DepSecDef memorandum required the CDAO and ODA&M to coordinate and issue a chartering directive by June 1, 2022. Status: Partial · Confidence: Moderate	The report says: The February 1, 2022 DepSecDef memorandum required that the CDAO and the Office of the Director of Administration and Management (ODA&M) coordinate to issue a chartering directive by June 1, 2022. The source says: will prepare by June 1, 2022, a chartering directive for my approval, based upon the results of

Source: the sources page, page 21.

EXHIBIT 8

Claims checked against the February 2022 CDAO memo (2 of 2)

THE CLAIM CHECKED	WHAT THE RECORD SAYS
Despite the June 1, 2022 deadline, as of June 2024 the DoD chartering directive and DoDI were still in draft form, over two years overdue. Status: Verified, changed since · Confidence: High	The report says: as of June 2024, the DoD chartering directive and DoDI were still in draft form. The source says: line 10 states "Effective: November 18, 2024" for DoD Directive 5105.89 (the CDAO chartering directive), meaning it was not officially in force before that date. line 75 states the Director of Administration and Management, with the CDAO, "will prepare by June 1, 2022, a..."
The chartering directive was delayed because of the significant amount of DoD-wide coordination needed and a shortage of personnel responsible for policy publication within ODA&M. Status: Unsettled · Confidence: Low	The report says: the delay in issuing the chartering directive occurred because of the significant amount of DoD-wide coordination needed, as well as a shortage of personnel responsible for policy publication within ODA&M. The source says: According to CDAO and ODA&M officials, the delay
As of June 2024, neither the chartering directive DoDD 5105.UW nor its implementing instruction DoDI 8410.dd had been approved. Status: Verified, changed since · Confidence: High	The report says: neither the chartering directive, DoD Directive (DoDD) 5105.UW, nor its implementing instruction, DoDI 8410.dd, had been approved The source says: DoDD 5105.89 (the CDAO chartering directive) became effective November 18, 2024.
The February 1, 2022 DepSecDef memorandum stated the CDAO is responsible for creating enabling digital infrastructure and services supporting development and deployment of data, analytics, AI, and digitally-enabled solutions. Status: Partial · Confidence: Moderate	The report says: the February 1, 2022 DepSecDef memorandum stated that the CDAO is "responsible for creating enabling digital infrastructure and services The source says: create enabling digital infrastructure and
As of June 2024, neither the CDAO chartering directive nor its implementing instruction had been approved. Status: Verified, changed since · Confidence: High	The report says: As of June 2024, neither the chartering directive nor its implementing instruction had been approved. The source says: DoDD 5105.89 (the chartering directive) became effective November 18, 2024, months after June 2024.

Source: the sources page, page 21.

EXHIBIT 9

Claims checked against the Responsible AI strategy

THE CLAIM CHECKED	WHAT THE RECORD SAYS
The CDAO issued its "Responsible Artificial Intelligence Strategy and Implementation Pathway" document in June 2022, focused on integrating and optimizing AI capabilities across DoD. Status: Partial · Confidence: Low	The report says: In June 2022, the CDAO issued the "Responsible Artificial Intelligence Strategy and Implementation Pathway," outlining the CDAO's primary focus of integrating and optimizing AI capabilities across the DoD. The source says: Title page dates the strategy June 2022; body pages are image-only, unreadable.

Source and notes: the sources page, page 21.

EXHIBIT 10

Claims checked against the 2023 AI Adoption Strategy (1 of 3)

THE CLAIM CHECKED	WHAT THE RECORD SAYS
The DoD's 2023 Data, Analytics, and AI Adoption Strategy required the CDAO to develop an implementation plan, and as of June 2024 that plan was still in draft form Status: Partial · Confidence: Moderate	The report says: as of June 2024, the implementation plan was still in draft form The source says: Strategy requires "implementation guidance," not a "plan"; CDAO's own comments call "still in draft"/no approval inaccurate.
The original report language said the AI Adoption Strategy builds on and supersedes seven named prior strategies dated 2018 to 2022. Status: Verified · Confidence: High	The report says: The AI Adoption Strategy builds on and supersedes the "DoD AI Strategy" (2018), "DoD Digital Modernization Strategy" (2019), "DoD Data Strategy" (2020) The source says: The AI Adoption Strategy builds on and supersedes the
Recommendation 1a directs the CDAO to finalize and publish an implementation plan as required by DoD's 2023 Data, Analytics, and AI Adoption Strategy that defines key foundational terms and outlines how the CDAO Council and DoD... Status: Partial · Confidence: Moderate	The report says: Finalize and publish an implementation plan as required by the DoD The source says: a. Complete and publish an implementation plan as required by the DoD's
On November 2, 2023 the DepSecDef published the 2023 DoD Data, Analytics, and Artificial Intelligence Adoption Strategy, called the AI Adoption Strategy in the report. Status: Verified · Confidence: High	The report says: On November 2, 2023, the DepSecDef published the The source says: The DoD news release page for the 2023 DoD Data, Analytics, and AI Adoption Strategy shows a release date of Nov. 2, 2023, and links the strategy PDF whose foreword is signed by Kathleen H. Hicks, Deputy Secretary of Defense. The PDF's own June 27, 2023 stamp is explicitly noted...
The AI Adoption Strategy builds upon and supersedes the DoD AI Strategy (2018) and DoD Data Strategy (2020). Status: Verified · Confidence: High	The report says: The AI Adoption Strategy builds upon and supersedes the The source says: The strategy says it builds upon and supersedes the 2018 AI Strategy and 2020 Data Strategy.

Source: the sources page, page 21.

EXHIBIT 11

Claims checked against the 2023 AI Adoption Strategy (2 of 3)

THE CLAIM CHECKED	WHAT THE RECORD SAYS
The AI Adoption Strategy also builds on the DoD Digital Modernization Strategy (2019), the DoD Enterprise DevSecOps Strategy Guide (2021), the DoD Software Modernization Strategy (2022), the DoD Trusted AI and Autonomy Critical... Status: Verified · Confidence: High	The report says: DoD Digital Modernization Strategy The source says: Footnote 1 lists DoD Digital Modernization Strategy (2019) among the guidance the Adoption Strategy builds on.
CDAO is developing DoD AI strategy through two documents: the AI Adoption Strategy, published November 2023, and the AI Adoption Strategy Implementation Plan, still in draft. Status: Partial · Confidence: Moderate	The report says: AI Adoption Strategy (published November 2023) The source says: (a read receipt of the DoD/war.gov news release page for the strategy) states the release date shown on the page is Nov. 2, 2023, and separately notes the PDF's cover carries a "Cleared for open publication, June 27, 2023" security-review stamp, explicitly characterized as "a..."
As of June 2024 the AI Adoption Strategy implementation plan was still in draft form, not yet issued. Status: Unsettled · Confidence: Low	The report says: as of June 2024, the implementation plan was still in draft form. The source says: The Nov 2023 Strategy requires an implementation plan but says nothing about a June 2024 status.
The Chief Digital and AI Officer approved the AI Adoption Strategy in 2023. Status: Unsettled · Confidence: Low	The report says: the Chief Digital and AI Officer approved it in 2023 The source says: The Strategy's only signatory is DepSecDef Kathleen Hicks (foreword); the document never uses the word "approved."

Source: the sources page, page 21.

EXHIBIT 12

Claims checked against the 2023 AI Adoption Strategy (3 of 3)

THE CLAIM CHECKED	WHAT THE RECORD SAYS
As of March 2024, a draft version of the implementation plan had been reviewed by the Chief Digital and AI Officer. Status: Unsettled · Confidence: Low	The report says: as of March 2024, a draft version of the implementation plan was reviewed by the Chief Digital and AI Officer The source says: The CDAO officials stated that, as of March 2024, a draft version of the
As of June 2024, the implementation plan was still only in draft form, not finalized. Status: Verified, changed since · Confidence: High	The report says: as of June 2024, the implementation plan was still in draft form The source says: The directive's effective date (Nov 18, 2024) postdates the June 2024 draft status.
CDAO's second comment argued that lacking an approved implementation plan does not impact their ability to manage and oversee the AI Adoption Strategy because they are following implementation guidance distributed in March 2023... Status: Verified · Confidence: Moderate	The report says: because they are following implementation guidance distributed in March 2023 and carried out by the CDAO Council and Strategy Implementation Working Group The source says: CDAO's own letter: guidance emailed March 12, 2023; CDAO Council/SIWG carries it through; plan's lack of formal approval doesn't limit CDAO's authority.
CDAO personnel gave the OIG the finalized Implementation Guidance required under the DoD's 2023 Data, Analytics, and AI Adoption Strategy. Status: Verified · Confidence: High	The report says: CDAO personnel provided us with the finalized version of the Implementation Guidance as required by the DoD The source says: Additionally, CDAO personnel provided us with the finalized version of the Implementation Guidance as required by the DoD's 2023 Data, Analytics, and AI Adoption Strategy.

Source: the sources page, page 21.

EXHIBIT 13

Claims checked against DoD Instructions 8320.02 and 8320.07

THE CLAIM CHECKED	WHAT THE RECORD SAYS
On March 13, 2024, during the evaluation, the CDAO took ownership of two existing DoD data, analytics, and AI policies (DoDI 8320.02 and DoDI 8320.07). Status: Unsettled · Confidence: Low	The report says: On March 13, 2024, during our evaluation, the CDAO took ownership of two existing DoD data, analytics, and AI policies The source says: DoDI 8320.02/8320.07 texts show no CDAO mention; the report cites a "Transfer of Proponency Memorandum" not in the source set.
DoDI 8320.02, "Sharing Data, Information, and Information Technology Services in the Department of Defense," was issued August 5, 2013 and incorporated Change 1 on June 24, 2020. Status: Verified · Confidence: High	The report says: DoDI 8320.02, "Sharing Data, Information, and Information Technology Services in the Department of Defense," August 5, 2013 (Incorporating Change 1, June 24, 2020). The source says: Incorporating Change 1, Effective June 24, 2020
DoDI 8320.07, "Implementing the Sharing of Data, Information and Information Technology (IT) Services in the Department of Defense," was issued August 3, 2015 and incorporated Change 1 on December 5, 2017. Status: Verified · Confidence: High	The report says: DoDI 8320.07, "Implementing the Sharing of Data, Information and Information Technology (IT) Services in the Department of Defense," August 3, 2015 (Incorporating Change 1, December 5, 2017). The source says: Incorporating Change 1, December 5, 2017

Source: the sources page, page 21.

EXHIBIT 14

Claims checked against the OIG's own report page

THE CLAIM CHECKED	WHAT THE RECORD SAYS
The report is DoD OIG Report No. DODIG-2025-039, dated November 14, 2024 Status: Verified · Confidence: High	The report says: Report No. DODIG-2025-039 NOVEMBER 14, 2024 The source says: Report No. DODIG-2025-039 NOVEMBER 14, 2024
The Implementation Guidance was distributed by email on March 12, 2023 to a broad swath of data leaders and to designated SIWG members. Status: Unsettled · Confidence: Low	The report says: This Guidance was distributed via email on March 12, 2023, to a broad swath of data leaders across the Department and to the designated members of the SIWG The source says: CDAO's own management comments (inside the OIG report) assert the email was sent; no independent record verifies it.
Management Comments were due by February 13, 2025. Status: Verified · Confidence: High	The report says: Please provide Management Comments by February 13, 2025. The source says: Please provide Management Comments by February 13, 2025.
The transmittal memorandum to the CDAO and the Army, Navy, and Air Force Auditors General is dated November 14, 2024. Status: Verified · Confidence: High	The report says: November 14, 2024 MEMORANDUM FOR CHIEF DIGITAL AND AI OFFICER The source says: November 14, 2024 MEMORANDUM FOR CHIEF DIGITAL AND AI OFFICER
The CDAO has coordinated with the DoD Chief Information Office (CIO) to transfer existing policies to the CDAO, aligning DoD policy so stakeholders can effectively develop and deploy data, analytics, and AI solutions. Status: Unsettled · Confidence: Low	The report says: coordinated with the DoD Chief Information Office (CIO) to transfer existing policies to the CDAO The source says: DoDD 5105.89 assigns CDAO an ongoing duty to coordinate with the CIO on data policy; it does not verify the specific past transfer the claim describes.

Source: the sources page, page 22.

EXHIBIT 15

Claims checked against DoD Directive 5105.89

THE CLAIM CHECKED	WHAT THE RECORD SAYS
As of June 2024, DoD Directive 5105.UW and DoD Instruction 8410.dd were still in draft form Status: Verified, changed since · Confidence: High	The report says: as of June 2024, DoD Directive 5105.UW and DoD Instruction 8410.dd were still in draft form The source says: The CDAO chartering directive (5105.89) took effect November 18, 2024.
The current draft DoDD 5105.UW ("Chief Digital and AI Officer") and DoDI 8410.dd ("DoD Data, Analytics, and AI Activities") only incorporate or cancel 6 of the over 60 outstanding documents. Status: Partial · Confidence: Moderate	The report says: in their current draft form only incorporate or cancel 6 of the over 60 documents The source says: Final DoDD 5105.89 lists 5 incorporated/canceled documents; DoDI 8410.dd is absent from the source set entirely.

Source: the sources page, page 22.

EXHIBIT 16

Coverage: how the forty checked claims were chosen

STAGE	COUNT	SHARE
Sentences pulled from the report as candidate facts	200	n/a
Pulled with their exact wording checked and matched against the report's own text	196	98% of pulled
Checkable against a named public document	102	51% of pulled
Selected by a written rule and checked here	40	39% of checkable
Of the 40: Verified	13	32% of the 40 selected
Of the 40: Verified, changed since	6	15% of the 40 selected
Of the 40: Partial	12	30% of the 40 selected
Of the 40: Unsettled	9	22% of the 40 selected
Source quotations checked for an exact match by a program	31 of 32 quoted	1 normalized

Source and notes: the sources page, page 22.

Where each exhibit's numbers come from

Every table in this report carries its full provenance here, under the same exhibit number it wears in the document.

Exhibit 1 Claims checked, by primary record

This build's own count of the verdict record, by the document each claim was checked against. The last row sums the eight above it and equals the 40-claim tally in Finding 01. DoD Instructions 8320.02 and 8320.07 are one row above but count as two of the eight primary records in the total row; see "How we did this," page 27.

Exhibit 2 The five-date record

The February 2022 memo, DoD Directive 5105.89, the report itself, and the OIG's own report page. "Jun 2024" is the report's own wording; no more precise date is stated anywhere in this document set.

Exhibit 3 The 12 claims where a detail does not match

The document each claim was checked against (Exhibits 1-7 name each one). Every row here also appears once in its own document's exhibit, marked Partial there.

Exhibit 4 The 9 claims and why they can't be settled

The report's own text (the only place these nine claims appear) and the absence of any matching primary record in this document set. A claim lands here only when no document in this set, public or private, settles it either way.

Exhibit 5 Confidence grade, by verdict

This build's own cross-count of the verdict record's status and confidence fields. The last row sums the four above it and equals the 40-claim confidence tally.

Exhibit 6 Claims checked against the December 2021 CDAO memo

DepSecDef memorandum, "Establishment of the Chief Digital and Artificial Intelligence Officer," December 8, 2021. Retrieved from the DoD OIG report's own citation list; captured 2026-09-09. A scanned image with no text layer: read from its page image and transcribed by hand. Status and Confidence, used the same way in every per-document exhibit that follows: Verified means the record backs the claim as stated (some of these carry a note that the underlying fact has since changed, which is a separate axis from whether the claim was right when checked). Partial means the claim is right in general and wrong in a named detail. Unsettled means no document in this set, public or private, settles the specific detail either way (see Exhibit 4 for why). Confidence grades the evidence behind the verdict, on the rubric explained in the analytic basis: it is not a second opinion on the claim itself. A section of the FY2019 defense authorization act (Public Law 115-232, section 238, "Joint Artificial Intelligence Research, Development, and Transition Activities," August 13, 2018) is also cited against one claim checked here, as the statutory root of the office the memo stands up.

Exhibit 7 Claims checked against the February 2022 CDAO memo (1 of 2)

DepSecDef memorandum, "Initial Operating Capability of the Chief Digital and Artificial Intelligence Officer," February 1, 2022. Retrieved from the DoD OIG report's own citation list; captured 2026-09-09.

Exhibit 8 Claims checked against the February 2022 CDAO memo (2 of 2)

DepSecDef memorandum, "Initial Operating Capability of the Chief Digital and Artificial Intelligence Officer," February 1, 2022. Retrieved from the DoD OIG report's own citation list; captured 2026-09-09.

Exhibit 9 Claims checked against the Responsible AI strategy

DoD's Responsible Artificial Intelligence Strategy and Implementation Pathway, June 2022, prepared under the May 26, 2021 Hicks memorandum. Retrieved from media.defense.gov; captured 2026-09-09. Mostly a scanned document: only the title page carries a text layer, and pages 2 through 4 were read from their page images.

Only one claim in the selected 40 checks against this record: nearly all of its body is a scanned image rather than machine-readable text (see the sources page), which limited how many of the report's claims against it could be checked with the same rigor as the other seven records.

Exhibit 10 Claims checked against the 2023 AI Adoption Strategy (1 of 3)

The 2023 DoD Data, Analytics, and Artificial Intelligence Adoption Strategy, published November 2, 2023 (the PDF's own cover carries a June 27, 2023 open-publication clearance stamp, a security-review date rather than the release date). Retrieved from media.defense.gov; captured 2026-09-09, cross-checked against a same-day read of the DoD news release page for the strategy.

Exhibit 11 Claims checked against the 2023 AI Adoption Strategy (2 of 3)

The 2023 DoD Data, Analytics, and Artificial Intelligence Adoption Strategy, published November 2, 2023 (the PDF's own cover carries a June 27, 2023 open-publication clearance stamp, a security-review date rather than the release date). Retrieved from media.defense.gov; captured 2026-09-09, cross-checked against a same-day read of the DoD news release page for the strategy.

Exhibit 12 Claims checked against the 2023 AI Adoption Strategy (3 of 3)

The 2023 DoD Data, Analytics, and Artificial Intelligence Adoption Strategy, published November 2, 2023 (the PDF's own cover carries a June 27, 2023 open-publication clearance stamp, a security-review date rather than the release date). Retrieved from media.defense.gov; captured 2026-09-09, cross-checked against a same-day read of the DoD news release page for the strategy.

Exhibit 13 Claims checked against DoD Instructions 8320.02 and 8320.07

DoD Instruction 8320.02, "Sharing Data, Information, and IT Services in the DoD," August 5, 2013 (incorporating a change effective June 24, 2020), and DoD Instruction 8320.07, "Implementing the Sharing of Data, Information and IT Services in the DoD," August 3, 2015 (incorporating a change dated December 5, 2017); ownership of both transferred to the CDAO March 13, 2024. Retrieved from the DoD issuance library; captured 2026-09-09.

Exhibit 14 Claims checked against the OIG's own report page

The DoD OIG's own report landing page for DODIG-2025-039, dodig.mil, read directly (not from a downloaded file) on 2026-09-09. Release date shown on the page: November 14, 2024.

Exhibit 15 Claims checked against DoD Directive 5105.89

DoD Directive 5105.89, Chief Digital and Artificial Intelligence Officer, effective November 18, 2024. Retrieved from the DoD issuance library; captured 2026-09-09.

Exhibit 16 Coverage: how the forty checked claims were chosen

The extraction, proving and selection pipeline applied to the DoD OIG report's own text, and this build's own count of every checked claim's status.

Sentences pulled and checkable are counted once each; the eight status rows below the line are the same forty claims broken out by verdict, and sum to the 40 selected.

One source quotation normalized whitespace to match the source's own text exactly; every other quoted excerpt matched byte for byte on the first check.

Quoted report words are printed with the text layer's own inter-character spacing normalized (a stray space the PDF extraction left inside a word or a number), never a change to the report's own wording.

RECOMMENDATIONS

RSC FOR PUBLIC RELEASE

Three habits for anyone who publishes claims, so a reader never has to run this check to find the gap.

RECOMMENDATION 01 OF 3

Date-stamp every claim that describes a status, a draft, or an in-progress state, and recheck each one inside 30 days of the report's own release date

Who and how: The signing office runs it; one re-read, about 30 minutes on a typical report.

1. Before a report ships, mark every sentence that states a status, a draft stage, or an in-progress fact ("still in draft," "as of [date]," "has not yet been approved").
2. Set a calendar reminder for 30 days after the planned release date.
3. On that date, recheck each marked sentence against the same sources used the first time.
4. If any status has changed, publish a one-line correction rather than letting the original stand uncorrected.

What we expect: Likely catches the class of claim this check found six of: true when written, false by the time a reader opens the document, because the underlying fact moved in the gap between checking and publishing.

How we will know it worked: Next release: count of status claims re-checked within 30 days of release; the target is all of them.

RECOMMENDATION 02 OF 3

Cite the primary document by its own title and date directly beside every factual sentence, not once in a source list at the back

Who and how: The drafting author writes the citation into the sentence; the editor holds the line.

1. While drafting, name the specific document and its date next to any sentence that states a fact, a count, or a quotation, not only in a bibliography.
2. Before the report is final, pull ten factual sentences at random and check each word choice against the cited document's own text.
3. Where a sentence paraphrases rather than quotes, check that the paraphrase does not add a detail the document does not contain.
4. Fix any mismatch found before publication, not after.

What we expect: Likely shrinks the class of claim this check found twelve of: a specific detail (a count, a name, a word) that drifts from what the cited document actually says, because the detail was never checked against the document's own words at the sentence level.

How we will know it worked: Next report: share of factual sentences carrying a specific document citation, checked against a random sample of ten.

RECOMMENDATION 03 OF 3

Label every claim that rests on an interview or an internal, non-public record, so a reader knows in advance which ones only the author can independently check

Who and how: The drafting author applies the label at the sentence or footnote level.

1. Adopt one label (a footnote marker, a bracketed tag) for any claim sourced only to an interview or an internal record not included in the public release.
2. Apply the label at first use of each such claim.
3. In the methods section, state plainly that labeled claims cannot be independently checked by an outside reader from the published materials alone.
4. Before release, count how many factual claims carry no public document behind them at all, and print that count once, near the front.

What we expect: Likely tells a reader in advance which claims they cannot independently check, the class this check found nine of, rather than letting a reader discover it only by trying and failing to find the source.

How we will know it worked: Next report: share of interview- or internal-record-based claims carrying a visible label.

We keep this list short on purpose: a report with ten recommendations has no priorities. None of the three below requires new data collection; each is a discipline applied to writing the report that already gets written.

ANALYTIC BASIS

RSC FOR PUBLIC RELEASE

Findings are covered in order across the pages that follow.

WHAT THE CONFIDENCE LABELS MEAN

They describe the strength of our **evidence**, not the size of the finding. A HIGH-confidence finding is not a bigger problem than a MODERATE one; it just means we are surer of it.

HIGH

Measured directly, for everyone. We would be surprised to be wrong.

MODERATE

The evidence points this way, but it has a known weakness we name below (a claim right in general but wrong in a named detail, or a source read from a scanned image rather than machine-checked text).

LOW

Suggestive only. Treat it as a question to test, not a fact to act on.

Finding 01 • The tally **HIGH**

The finding: Most of the report's claims hold up; the rest need a caveat, not a rewrite. Its page: 3

ALTERNATIVES CONSIDERED

The 12 partial verdicts could reflect an unreasonably strict reading, marking a claim wrong for a rounding difference or a reasonable paraphrase. Reading the 12 in Finding 03 argues against that: each turns on a specific, checkable detail (a named office absent from a memo, a document's own stated title), not on tone or phrasing. A second alternative is that the nine unsettled claims are really verifiable and the check simply missed the document; each was reviewed by a second reader whose only job was to find that document, and none did.

WHAT WOULD CHANGE THIS JUDGMENT

A wider document set. This check used the eight records the report itself cites for the claims checked here; if a claim marked unsettled turns out to rest on a document the report drew on but did not name, adding that document would move it out of the unsettled group, and the tally should be re-run before anyone treats these four counts as final.

CAVEAT

Forty is the number of claims a reader could check against a public document, chosen by a written rule from 102 checkable candidates; it is not every fact the report states, and it is not a random sample of them.

Finding 02 • The world moved on **HIGH**

The finding: The rule this report called overdue took effect four days after it went out. Its page: 4

ALTERNATIVES CONSIDERED

The four-day gap could be coincidence rather than a late-stage rush tied to the report's own release; nothing in this document set states that the directive's timing responded to the report. What is checkable is only the sequence of dates themselves, which two separate primary records independently back within this check, so the sequence itself carries HIGH confidence even though its cause does not need to be known for the timeline to hold.

WHAT WOULD CHANGE THIS JUDGMENT

A dated internal record showing when the directive was actually finalized relative to the report's release. Absent that, this finding rests on public dates alone and states only the sequence, never a cause.

Finding 03 • Where they disagree

MODERATE

The finding: A dozen claims are right in general and wrong in a detail. Its page: 5

ALTERNATIVES CONSIDERED

Some of these twelve could be defensible summarizing rather than error: calling the CDAO's development work a "plan" when the strategy's own word is "guidance" is arguably a fair paraphrase, not a factual miss. Reading each case on its own wording is why this finding carries MODERATE rather than HIGH: several turn on a specific, countable detail (an office count, a document date) where the source settles the question outright, while a few turn on a word choice a careful reader could defend either way.

WHAT WOULD CHANGE THIS JUDGMENT

A later corrected edition of the report, or a published clarification from the audited office, on any of these twelve details. None exists in this document set as checked.

Finding 04 • What can't be settled

HIGH

The finding: 9 claims can't be checked, and this report says so instead of guessing. Its page: 6

ALTERNATIVES CONSIDERED

The nine could be settleable with more effort: a records request might surface the internal transfer memo, or a follow-up interview might corroborate an official's account. That possibility does not change today's verdict, because the standard applied throughout is what the current public document set can settle, not what some future record might.

WHAT WOULD CHANGE THIS JUDGMENT

Any of the nine's underlying internal records entering the public domain (a released memo, a published interview transcript) would move that claim out of this group and into a verdict based on the document.

Finding 05 • The confidence grade

HIGH

The finding: Grade and verdict are two different questions, and both matter. Its page: 7

ALTERNATIVES CONSIDERED

An alternative rubric could grade a claim's ultimate verdict (verified, partial, unsettled) as the whole signal and skip a separate confidence axis. Publishing both keeps the two questions separate on purpose, because a reader deciding whether to act on a claim needs to know both what the record shows and how sure that showing is; collapsing them would hide the difference between a claim checked against clean machine-read text and one checked against a hand-transcribed scan.

WHAT WOULD CHANGE THIS JUDGMENT

A machine-readable copy of the scanned December 2021 memo would remove the one transcription-dependent grade in this set; nothing else here is expected to move without a new document.

What we checked

One published federal report, DoD OIG Report DODIG-2025-039, released November 14, 2024, and the eight primary DoD records it cites for the facts checked here: two DepSecDef memoranda, a strategy document, a responsible-AI strategy, two DoD instructions treated as one pair, a chartering directive, and the OIG's own report page. Two of the eight survive largely or entirely as scanned images rather than machine-readable text; both are named on the sources page, and each was read from its own page image rather than skipped.

How the forty were chosen

200 candidate facts were collected from the report's own text and analyzed for whether each carried a specific, checkable claim; 196 of those 200 had their exact wording independently checked and matched against the report before anyone judged them. 102 were checkable against a named public document rather than against an internal record alone; 40 of those were selected by a written rule for a full check, choosing the claims most useful to a reader deciding whether to trust the report, not a random sample of the 200.

How you can check our work

The eight primary records this check used are archived with their own retrieval date and a digital fingerprint (a 256-bit checksum of the exact file), listed in full on the sources page. A reader can retrieve the same report and the same eight records and re-derive every verdict in this document without contacting us; nothing here was scored from memory, and the check is reproducible by anyone holding the same eight documents.

How each claim was checked

Each of the 40 selected claims was read by one checker against its assigned primary document and given a first verdict, then attacked by a second checker whose only job was to find a reason to overturn it. 21 first verdicts stood after that challenge, 13 were revised, and 6 carried no challenge at all. A claim landed Verified only when the cited document said what the report says; Partial when the document backed part of the claim and contradicted or omitted a named detail; Unsettled when no document in the set, public or private, could settle it either way. This rubric follows the RSC Standard, modeled on ICD 203 (Intelligence Community Directive 203, the U.S. intelligence community's directive on analytic standards).

What this cannot tell you

This check reads the DoD OIG's own cited documents; it does not independently investigate the CDAO's actual performance, and a claim graded Verified is a statement about what the record says, not a judgment that the underlying policy process worked well. The 40 claims checked here were chosen because they are checkable against a named document, which is not the same set a reader would choose for their own purposes; a claim outside this 40 was not checked at all, and its absence here says nothing about whether it holds up.

The assumptions this report leans on

Every report stands on assumptions. The one marked LINCHPIN carries the most weight: if it is wrong, the findings that lean on it fall with it. We list them here, in plain sight, so a skeptical reader can check them instead of taking our word.

LINCHPIN

This check covers only the documents the report itself cites: the eight primary records checked here. A fact the report drew on without naming a document for it sits outside the check entirely, and would need that document added before it could be checked.

- The report's own text layer (extracted from its published PDF) is faithful to its printed page images; where it was not, that is named on the exhibit for the claim it affects.
- A status stated "as of" a given month is judged against the cited documents' own dates, not against events after the report's release, except where a finding names that gap directly (Finding 02).
- Two of the eight primary records survive largely as scanned page images; the text read from those images is a faithful transcription, checked by a second reader, but was not independently re-scanned by a separate program the way machine-readable sources were.

Changelog

v1.0 public sample, issued 2026-09-09

v1.0 · 2026-09-09. First public issue. 200 candidate facts pulled from DoD OIG Report DODIG-2025-039 and checked word for word against its own text; 40 selected by a written rule and checked against eight primary DoD records; every verdict read by one checker and attacked by a second; every source quotation re-checked by a program for an exact match. (This entry versions the report itself; the RSC Standard/template it follows, printed in the page footer, carries its own separate version number.) (first issue)

Only the newest change is printed in full; every prior version is one line here, and the complete change log for this document is retained with the engagement record.