



# Realignment of DOD's Chief Digital and AI Officer (CDAO)

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On August 14, 2025, Deputy Secretary of Defense Steve Feinberg, who is now using "Deputy Secretary of War" as a "secondary title" under Executive Order 14347 dated September 5, 2025, issued a memo "[directing] the strategic realignment of the Chief Digital and Artificial Intelligence [AI] Officer (CDAO) under the Under Secretary of Defense for Research and Engineering (USD(R&E))." This realignment, the memo stated, was intended to "directly [implement] the White House AI Action Plan's directive to drive AI adoption within the Department of Defense [DOD]." (DOD is now "using a secondary Department of War designation," under Executive Order 1437 dated September 5, 2025.) Prior to the August 14, 2025, memo, CDAO, the DOD senior official responsible for AI, reported directly to the Deputy Secretary of Defense. Some analysts have argued that such an organizational change could signal a diminution of focus on AI and "create new bureaucratic barriers" to fielding AI solutions. Congress has previously passed legislation related to DOD's management of AI programs and may conduct oversight of this change.

## **Background and Function**

Over the years, DOD has managed AI through a number of organizational structures. Pursuant to the FY2019 National Defense Authorization Act (NDAA; P.L. 115-232, §238), DOD established the Joint Artificial Intelligence Center (JAIC, pronounced "jake") to "develop, mature, and transition artificial intelligence technologies into operational use." In a June 27, 2018, memo, DOD established the JAIC under the department's Chief Information Officer (CIO) and directed the JAIC to coordinate DOD AI projects of more than \$15 million annually. According to the memo, the JAIC was to undertake a number of National Mission Initiatives (NMIs)—"large-scale efforts to apply AI to a cluster of closely related, urgent, joint challenges"—including NMIs related to predictive maintenance, humanitarian aid and disaster relief, warfighter health, and business process transformation.

In a December 8, 2021, memo, then-Deputy Secretary of Defense Kathleen Hicks directed the establishment of the Office of the CDAO, which was to "serve as the successor organization to the JAIC, reporting directly to the Deputy Secretary of Defense, pursuant to Section 238 of the [FY 2019 NDAA], as amended." This change in the office's reporting structure—from DOD's CIO to the Deputy Secretary of Defense, directly—was, Hicks later said, intended to produce an "empowered" CDAO and reflected an

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elevation in the prioritization of CDAO's work within the department. Per the 2021 memo, CDAO was to "serve as the Department's senior official responsible for strengthening and integrating data, artificial intelligence, and digital solutions in the Department." To this end, the memo stated, CDAO was to "serve as an intervening supervisor between [the Defense Digital Service] and the Immediate Office of the Secretary of Defense and the Deputy Secretary of Defense." According to the memo, the Chief Data Officer (CDO) was directed to "be operationally aligned" to CDAO, "while continuing to report to the Secretary of Defense and the Deputy Secretary of Defense through the [DOD CIO], as required by Section 903(b)(3) of the NDAA for FY 2020 [P.L. 116-92]." (Section 903 of P.L. 116-92 states in part that the DOD CDO is to be the DOD official "with principal responsibility for providing for the availability of common, usable, Defense-wide data sets.")

The role of CDAO was further outlined in a February 1, 2022, memo, which noted that CDAO was to have responsibility over the following functions:

lead and oversee DoD's strategy development and policy formulation for data, analytics, and AI; work to break down barriers to data and AI adoption within appropriate DoD institutional processes; and create enabling digital infrastructure and services that support Components' development and deployment of data, analytics, AI, and digital-enabled solutions. Moreover, CDAO will selectively scale proven digital and Al-enabled solutions for enterprise and joint use cases as well as surge digital services for rapid response to crises and emergent challenges.

A second February 1, 2022, memo additionally clarified the role of CDAO in contrast to other senior DOD officials with responsibilities for AI, data, and related capabilities.

Deputy Secretary Feinberg's August 14, 2025, memo realigning CDAO to USD(R&E), an effective demotion, notes that the realignment is intended to "[unify] AI strategy, development, and implementation under the [USD(R&E)] to accelerate capability delivery"; [ensure] tighter integration between AI research, engineering, and operational deployment"; "[clarify] long-term stewardship and resourcing for critical enterprise AI platforms"; and "[streamline] management and oversight while preserving statutory responsibilities." In response to this realignment, retired Air Force Lieutenant General Jack Shanahan, the inaugural director of the JAIC stated, "When you pull an organization that was a direct report to the deputy secretary or secretary and move it somewhere else in the Pentagon, no matter what the intent might be, the message to the force is loud and clear: This isn't a priority." In contrast, proponents of the move assert that "this realignment is the next step in making a uniform, AI-first push for [DOD].... By aligning the CDAO under the USD(R&E), [the department creates] a powerful innovation engine that can deliver AI superiority from laboratory to battlefield."

## **Issue for Congress**

As discussed above, Congress has previously passed legislation related to DOD's management of AI programs and may conduct oversight of the realignment of CDAO. Congress may direct the Comptroller General—the head of the Government Accountability Office—to conduct an independent analysis of DOD's management of AI and assess the impact of different reporting structures on DOD's ability to field AI safely, efficiently, and at the speed of relevance.

Congress may also examine similar case studies and, if desired, direct DOD to adopt a particular reporting structure for CDAO. For example, the Defense Innovation Unit (DIU), like CDAO, has been subject to a number of reporting structures throughout its history, with senior defense officials reportedly describing the structure in which DIU reported to USD(R&E) as one that "impeded its influence." Congress directed in Section 913 of the FY2024 NDAA (P.L. 118-31) that the DIU director "report directly to the Secretary without intervening authority." Congress may consider whether a similar reporting structure would be appropriate for CDAO.

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