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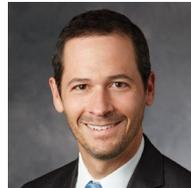
- Megan Cameron, *Princeton University*
- Michael Cartier, *U.S. Naval Postgraduate School*
- Alon Mannor, *Reichman University*
- Peter Vartanian, *GéoPoly Global*

Sincerely,



A handwritten signature in black ink, appearing to read "Scott W. Atlas".

**Scott W. Atlas**  
Robert Wesson Senior Fellow  
Hoover Institution



A handwritten signature in black ink, appearing to read "Joshua D. Rauh".

**Joshua D. Rauh**  
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# Policy Recommendations to Bolster the United States Defense Industrial Base

*Megan Cameron, Princeton University*

## The Issue

The United States Defense Industrial Base (DIB) is not prepared to support our nation's modern warfighting needs. The COVID-19 crisis and the Russian invasion of Ukraine highlighted critical weaknesses in our industrial capabilities, such as our dependence on other nations for crucial materials and products, as well as our stockpiles of weapons systems and munitions that are depleting far faster than they can be replenished.<sup>1</sup> With the United States now providing military aid on two separate fronts to both Ukraine and Israel, the DIB is stretched too thin to sufficiently mobilize in the case of a three-front war if armed conflict were to break out in Asia between China and Taiwan.

The first key obstacle that stands in the way of DIB modernization and development is budget instability. Congress's use of continuing resolutions for fifteen of the last sixteen years has created consistent uncertainty surrounding annual defense budget appropriations, which wastes time, slows the implementation of new initiatives, and strains the relationship between the Department of Defense (DOD) and its partners.<sup>2</sup> A second obstacle, convoluted and outdated regulations, also makes partnering with the DIB costly and inaccessible. This is a significant problem because many of the DOD's current initiatives to strengthen the DIB rely on the department's ability to foster and maintain these relationships. Finally, our reliance on interdependent global supply chains increases the risk of adversarial influence or interference in the form of a disruption or outright attack.

Current DOD industrial strategies have successfully identified clear, long-term priorities to guide policy development and investment in the DIB, particularly through the inaugural National Defense Industrial Strategy.<sup>3</sup> However, they focus primarily on the concept of generational change,<sup>4</sup> failing to include enough small-scale, actionable, and measurable solutions that can be accomplished immediately, making this grand vision for the future difficult to attain.<sup>5</sup> The health of the DIB plays a direct role in determining whether our military and the militaries of our allies can sustain a competitive advantage over our adversaries. As the focus of contemporary US defense strategy continues to shift toward great-power competition with China, it is crucial for the DOD to reevaluate the structure of the DIB with resiliency and adaptability in mind.<sup>6</sup> Time is of the essence, and it is imperative for the US to take aggressive action before entering another conflict.

## Background

From the 2010s to the 2020s, the strategic focus of the federal government began to shift from counterterrorism to great-power competition, bringing greater attention to the weakened state of the DIB. In 2017, President Donald Trump signed Executive Order 13806, which called for an increased investment of attention and

resources into the DIB. It also identified significant harmful changes that have led the US manufacturing sector to become “fragile,” raising concerns about the health of the DIB and its “ability to compete in the global marketplace.”<sup>7</sup> Some of these changes include increasingly “unreliable cash flow to small businesses” being “driven by a range of issues from appropriations delays to commonly used contracting practices,” as well as “regulations and business practices” that are “difficult to understand, costly to implement, and...often create barriers to doing business with the DOD.”<sup>8</sup>

Additionally, signed in February 2021, President Biden’s Executive Order 14017 “established a first-of-its-kind Supply Chain Disruptions Task Force” aimed at addressing “the challenges arising from a pandemic-affected economic recovery.”<sup>9</sup> The Task Force worked “to monitor and address near-term supply chain challenges... and prepare response and mitigation efforts” for “potential supply chain constraints and bottlenecks.”<sup>10</sup> The Executive Order also called for “a comprehensive review of supply chains in critical sectors, including the defense industrial base,”<sup>11</sup> which led to the publishing of a *100-Day Supply Chain Review Report* in June 2021.

These Executive Orders helped guide the development of the DOD’s first-ever National Defense Industrial Strategy (NDIS), which was released in 2023 under President Biden and served as a culmination of the previous six years of Pentagon efforts to address DIB vulnerabilities. The document identifies four long-term priorities or areas for achievement to better coordinate a whole-of-government approach to DIB modernization, which include Resilient Supply Chains, Workforce Readiness, Flexible Acquisition, and Economic Deterrence.<sup>12</sup> It also details the risks posed to the US if those priorities are not fulfilled.

### **Available Course of Action**

Based on the challenges outlined above, the recommended course of action for the federal government is to streamline and accelerate NDIS implementation to make partnering with the DOD more accessible for our allies and DIB companies. This would allow for incremental progress to be made toward the DOD’s ambitious goals of maximizing US capabilities and readiness for a potential three-front conflict by increasing the DIB’s surge capacity in the long term. Additionally, by opening the door for new DOD partnerships and strengthening current ones, the recommended course of action would allow for the successful implementation of changes that would help the US to reduce its reliance on adversarial nations for crucial products and materials, as well as increase visibility of critical supply chains.

A key component of this course of action would be for the president and Congress to fully utilize and expand the authorities granted by Title III of the Defense Production Act (DPA) to increase supply chain resilience, foster American innovation, and avoid further “appropriations-related delays.”<sup>13</sup> Title III allows the president to provide “loan guarantees, loans, purchases, and purchase commitments, grants, and other financial assistance directly to private businesses.”<sup>14</sup>

With these powers, the DPA possesses contemporary applications and several relevant avenues for change, as demonstrated by the significant increase in the “number and variety of DPA actions” used in 2020 after both President Trump and President Biden invoked its powers to respond to the COVID-19 crisis.<sup>15</sup>

In order to support this full execution of DPA authorities, Dr. Laura Taylor-Kale, the former assistant secretary for industrial base policy, outlined specific areas for reform within the act at a House Financial Services Committee hearing in May 2024. One example of the proposed reform is increasing the period of availability for DPA funds from a limit of five years to nonexpiring so the DOD can provide more robust financial assistance to DIB companies. According to Dr. Taylor-Kale, “purchase commitments, in particular, would help spur advanced material procurement and make DOD demand more predictable” for these partners.<sup>16</sup> Promptly recognizing this valuable potential in the DPA is particularly important as all but four of its provisions are set to expire on September 30, 2025, if congressional action is not soon taken to reauthorize it.<sup>17</sup>

Another key component of this course of action is for Congress to renew its commitment to return to regular order and pass on-time annual defense appropriations bills. As highlighted previously, budget instability is one of the biggest obstacles that prevents full cooperation between DIB companies and the DOD due to Congress’s repeated use of continuing resolutions over the last sixteen years, including the “full-year” continuing resolution that was enacted on March 14, 2025, through September 30 to avoid a government shutdown.<sup>18</sup> A continuing resolution is needed any time Congress and the president do not reach an agreement on spending levels, so their use has become very common with the increasing partisanship and divisiveness that has been plaguing our country. Since fiscal year 1998, 138 continuing resolutions have been enacted by policymakers, which comes to an average of around five per year.<sup>19</sup>

Third, the DOD should adopt a tiered manufacturing system to establish a spectrum of procurement preferences that would help encourage coproduction among trusted allies. This system could be organized into three categories. The first, Highest Security, would prioritize US production of the most sensitive defense products like critical minerals and semiconductors through onshoring. The second, Moderate Security, would encourage competition for contracts among trusted allies to increase arrangements with partners in crucial areas like munitions production and shipbuilding that do not necessarily require highest-security-level protections. By implementing this system and easing restrictions, such as those outlined in International Traffic in Arms Regulations that control the manufacture, sale, and distribution of defense- and space-related products and services, would reduce confusion, delays, and unpredictability for foreign allies during the US technology transfer process and the export of other defense materials.

Finally, Congress and the DOD should cooperate to expand the use of multiyear procurement contracts. DIB companies and partners are generally unwilling to take financial risks without contracts because of the necessary capital investment and personnel requirements. Producers benefit from steady and predictable orders that are enabled by contracts, especially over the long term, so expanding the use of multiyear procurement would assist in incentivizing participation in DIB expansion efforts. According to the NDIS, this expansion must take into account the shifting nature of today's "evolving threat environment," which causes "priorities to shift." Traditional contract policies that "involve funding adjustments, competitive procurement principles, compliance, reporting, and oversight" can fortunately "be applied to mitigate risks" while ensuring that they are adapted "to meet speed and agility priorities." This adaptation can be modeled after the pathway for software acquisition, which uses "modern development practices" and "existing contracting authorities" to "execute rapid and iterative delivery of software capabilities."<sup>20</sup>

One of the primary weaknesses of the recommended course of action is the heavy short-term cost, which would easily demand a financial investment from the DOD with a magnitude in the billions of dollars, not millions.<sup>21</sup> The DOD would require more than a \$38 billion increase to the federal defense budget for the 2025 fiscal year alone, followed by years of consistent, sustained investments of similar or greater magnitude.<sup>22</sup> This increase could potentially create a higher risk of financial waste, abuse, and price gouging at the hands of defense contractors. While instances of these abuses are reprehensible and deserving of full punishment under the law, cases of major fraud and price gouging are the exceptions, and cannot be accepted as an excuse for failing to invest in strengthening and modernizing the DIB.<sup>23</sup>

An alternative to this course of action would be to adopt a strategy of retrenchment similar to President Trump's current "America First" foreign policy framework, which has called for drastic reductions in US diplomatic and military commitments abroad. A potential strength associated with this strategy is the temporary alleviation of pressure on the DIB, which could reduce some of the immediate need for a large increase in the defense budget and allow for reductions in defense spending that would help to save taxpayer money and better mitigate the increased risk of fraud and abuse. Across both of his terms, President Trump has issued a series of Executive Orders that demonstrate his own commitment to modernizing the DIB in this way,<sup>24</sup> but the US "cannot address its supply chain vulnerabilities alone," and it is virtually impossible for the US to attempt to immediately "manufacture all needed products at home" without the assistance of allies.<sup>25</sup> This is why fully retreating from the world stage is not a viable course of action.

As the former Chairman of the Joint Chiefs of Staff Retired US General Mark A. Milley stated during a DOD appropriations Senate hearing in May 2023, "preventing great power war through readiness and deterrence is very expensive, but not as expensive as fighting a war and the only thing more expensive than fighting a war is losing a war."<sup>26</sup>

## Actionable Recommendations

1. President and Congress: Reauthorize the DPA to fully utilize and expand the authorities granted by Title III through statute amendments and by increasing the period of availability for DPA funds.
2. Congress: Renew the commitment to return to regular order and pass on-time annual defense appropriations bills, avoiding the use of continuing resolutions
3. DOD: Adopt a tiered manufacturing system to establish a spectrum of procurement preferences that will combine onshoring for highest-security items, friend-shoring for medium-security items, and offshoring for lower-security items.
4. Congress and DOD: Expand the use of multiyear procurement contracts for the production of additional types of munitions to replenish depleting stockpiles

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# A Republic of Volunteers: A Modern Model for Voluntary National Service

Michael Cartier, U.S. Naval Postgraduate School

*The health of a democratic society may be measured by the quality of functions performed by private citizens. —Alexis de Tocqueville, Democracy in America*

In 1831, Alexis de Tocqueville traveled across the United States and described a society defined by citizens who freely shouldered common burdens. He depicted a restless, egalitarian nation empowered by voluntary associations and a sense of civic duty. Nearly two centuries later, the same question remains: What binds Americans together as citizens if not a common respect for democratic ideals and the willingness to serve them?

## Introduction

Early twenty-first-century America is marked by civic fragmentation. In a nation of immense wealth and power, too many Americans live as strangers. Online discourse has splintered into echo chambers, while geographic and social mobility has stagnated. Rebuilding the civic fabric Tocqueville admired requires bringing Americans together in common purpose, regardless of age, race, gender, income, or religious beliefs. Mandatory service has been perennially proposed as a way to create unity through common public service. Yet inducing service by coercion undercuts the spirit such a program intends to cultivate, and is broadly unpopular, is difficult to enforce, and risks generating resentment rather than civic renewal.<sup>1</sup> Moreover, with approximately 3.5 million Americans reaching adulthood each year, compelling millions to serve absent a national emergency would overwhelm existing programs with unwilling participants.<sup>2</sup>

In contrast, the United States sustains a constellation of voluntary opportunities, including the armed forces, Peace Corps, and AmeriCorps. However, those programs are fragmented, underfunded, and too small to meet national needs. If the goal is to inspire broad participation and strengthen civic bonds, then the path forward is clear: a voluntary system with a unified framework, stronger incentives, and billets sufficient to welcome all who wish to serve. By incentivizing rather than mandating national **service**, the US can strengthen civic unity, fill critical workforce shortages, and cultivate a generation united by shared experiences.

## Contemporary Challenges

America faces a civic cohesion deficit, including political polarization, declining trust, and weakening social bonds. In 1984, 49 percent of Americans agreed that “most people can be trusted,” a statistic that declined to 29 percent by 2014.<sup>3</sup> Public trust in government plummeted from over 75 percent during the Kennedy administration to 22 percent in 2024.<sup>4</sup> Polarization has deepened as well, with 58 percent of Americans

holding negative views of the opposing party, up from 19 percent in 1994.<sup>5</sup> This lack of trust has tangible effects beyond incivility, including the election of more-radical candidates and a measurable increase in political violence.<sup>6</sup>

At the same time, the US struggles with persistent personnel shortages in public service. The military has experienced particularly devastating shortfalls in manning, with the Army missing its recruiting goal by 25 percent in fiscal year 2022.<sup>7</sup> As of 2025, the Peace Corps could fill only 45 percent of its billets.<sup>8</sup> Likewise, AmeriCorps' nationwide volunteer programs remain chronically underfilled.<sup>9</sup> One in eight K–12 teaching positions is vacant or staffed by an uncertified teacher.<sup>10</sup> America's open labor market is one of its greatest economic strengths, but careers in fields such as finance and law consistently outbid public service salaries, leaving educators, aid workers, and military servicemembers at a disadvantage.<sup>11</sup> Civic roles thus expand or contract according to private market fluctuations rather than public need.<sup>12</sup>

### **National Service as a Solution**

Declining public trust and cohesion has multiple causes, including political polarization, social media fragmentation, scandals, and economic inequality. There have been a range of proposed solutions to these problems, including ranked-choice voting, digital literacy campaigns, increased transparency in government, and a plethora of proposals to deal with wealth inequality. Likewise, personnel shortages in the public sector have been linked with low compensation, a lack of prestige, and fear of physical harm. Efforts to improve compensation programs, promote service as a prestigious career option, and increase awareness of the realities of public service careers are just a few options to address these challenges. However, none of these solutions can address the deep erosion of civic unity alone.

A program of national service can be a crucial part of the solution, offering a proven means of fostering civic trust and building durable habits of public engagement. Studies show that 72 percent of AmeriCorps alumni continue volunteering in their communities, a 25 percentage point difference with those who considered service but did not join.<sup>13</sup> Similarly, 70 percent report more positive views of people with different backgrounds.<sup>14</sup> Veterans also consistently report higher rates of civic involvement than non-veterans.<sup>15</sup> Moreover, as the RAND Corporation found, new military benefits between 2004 and 2008 boosted recruitment by 20 percent, while a third of Army recruits in 2018 cited healthcare, tuition assistance, and the GI Bill as decisive incentives for service.<sup>16</sup>

### **Volunteer Programs in 2025: What Is Missing?**

The US hosts a patchwork of volunteer programs, but funding and management are inconsistent and billets too limited. Without stronger incentives and expanded billets, they cannot meet the needs they were designed to serve. A reformed program must provide a unified framework for service, improved incentives for participation, and a larger number of positions for eligible volunteers.

A modern Voluntary National Service Program would establish a two-year track with optional four-year tracks, consolidating existing programs under a single framework. Two-year tracks would include Peace Corps assignments and AmeriCorps initiatives such as Teach for America, conservation, disaster response, and elder support. Four-year tracks would include the armed forces, emergency medical technician (EMT) and healthcare apprenticeships, community policing volunteer initiatives, firefighting training programs, and infrastructure programs. Applicants would undergo standardized assessments and then select their track and program preferences, which managers would match to national needs.

Clear and improved incentives would be a critical part of expanding participation in the Voluntary National Service Program. Amidst debates over universal college tuition assistance and loan forgiveness, applying the GI Bill model to the two-year track program would be an ideal compromise, offering two years of paid college tuition in exchange for a two-year term of public service. Other financial incentives for the two-year track could include counting the term of service toward Public Service Loan Forgiveness (PSLF) eligibility, exempting service stipends from taxation, providing childcare assistance to eligible volunteers, and even establishing a permanent public service tax credit for those who complete their service. While financial incentives can broaden the applicant pool, they are less compelling for higher-income families for whom cost is not a primary concern. To ensure participation across all socioeconomic groups, the program must also support pathways to prestigious professional careers. Incentives could include preferential admission to public and participating private undergraduate and graduate schools, as well as preferential or noncompetitive eligibility for judicial clerkships, government fellowships, foreign service officer programs, congressional staff roles, and other positions across the government. Four-year track participants would qualify for all two-year track benefits plus GI Bill and equivalent tuition programs, more extensive salary and benefits packages, professional certifications, and direct career on-ramps.

Mass participation in public service requires expanding the number of positions available. If the stronger incentives program induces even 5 percent of those reaching adulthood each year to serve, approximately 180,000 new participants would join these programs annually. While the military has no shortage of positions to fill, nonmilitary public service programs are too small to accommodate a significant influx of volunteers. In 1966, the Peace Corps had over fifteen thousand volunteers in active service, a number that had plummeted to only twenty-six hundred as of April 2024.<sup>17</sup> Expanding the number of billets can be accomplished at relatively low cost, even with the expanded incentives outlined above. With a \$1 billion budget (only 0.014 percent of federal outlays), AmeriCorps supports approximately two hundred thousand volunteers in its participating programs.<sup>18</sup> These programs should be exponentially enlarged, building upon initiatives like the Service for America Act and former Senator John McCain's proposal for a new Civilian Conservation Corps to allow every willing and eligible American an opportunity to serve.

## Conclusion

The US has no shortage of economic wealth or military power but suffers from a cohesion deficit. Expanding voluntary service offers a direct remedy. For the cost of a fraction of one percent of the federal budget, Washington could build an institution that broadens opportunity and unites citizens across lines of class, race, and ideology while providing for the public good. Tocqueville's observed spirit of civic responsibility was rooted in voluntary association rather than compulsion. A Voluntary National Service Program can renew that tradition, bringing Americans together across lines of division, restoring trust in institutions, and channeling America's dynamism and restlessness into schools, hospitals, forests, communities, and national defense, proving that freely chosen public service remains at the core of American democracy.

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# FOIA Accelerate: A Governance-First NLP Pilot to Cut the Federal FOIA Backlog

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The Freedom of Information Act (FOIA) is the legal mechanism by which citizens, journalists, businesses, and civil society groups gain access to records held by the federal government. FOIA underpins democratic accountability by ensuring that government actions cannot remain opaque to those they govern. Yet FOIA is straining under unprecedented demand. In Fiscal Year (FY) 2024, federal agencies received more than 1.5 million FOIA requests, a record high, while backlogs rose substantially across departments.<sup>1</sup> Agencies such as the Department of Homeland Security (DHS) process very large caseloads and contribute a sizable share of the backlog.<sup>2</sup>

This problem brings serious consequences: Requesters wait months or years for responses; litigation over delays drains agency resources; and public trust is weakened when transparency mechanisms falter.

Even though investments in portals and hiring have increased, the upward trend has not been reversed. The bottleneck is not only staffing but also the absence of modern, auditable tools to triage, route, redact, and summarize records at scale.<sup>3</sup>

This proposal recommends FOIA Accelerate, a governance-first pilot that deploys conservative natural language processing (NLP) in four targeted applications:

1. An intake routing classifier
2. Personally identifiable information (PII)-aware redaction suggestions for human review
3. Near-duplicate request and record clustering
4. Plain-language summaries for complex documents

The pilot mandates human sign-off on every automated suggestion, publishes model cards and evaluation results, and aligns with National Institute of Standards and Technology Artificial Intelligence Risk Management Framework (NIST AI RMF) and Office of Management and Budget (OMB) Circular A-130. If successful, FOIA Accelerate should reduce backlogs by at least 25 percent and improve mean time to first response by roughly 20 percent in pilot components, while preserving legal safeguards (for explanation on metrics, see Appendix A).<sup>4</sup>

## **Problem and Evidence**

FOIA is a cornerstone of governmental transparency, but the system is under strain. The federal government's FOIA ecosystem received well over one million requests in recent years. FY2024 marked a new record, and agencies reported larger backlogs compared with previous years.<sup>1</sup> Many agencies report increasing volumes of complex, cross-component requests and documents stored across emails, chat logs, cloud stores, and other distributed repositories, which increase search and review costs.

Moreover, coordinated requester campaigns and duplicative submissions multiply workload without commensurate informational benefit. Some agencies report that a relatively small set of high-volume components account for a large fraction of pending requests, stressing centralized FOIA teams.<sup>2</sup>

Even though staffing increases and better intake portals improved marginally, it did not alter the structural problem: FOIA processing remains labor-intensive and repetitious.<sup>3</sup>

Private vendors and state agencies have begun experimenting with AI-assisted processing; industry blog posts and practitioner reports describe redaction and search automation tools in the wild.<sup>5</sup>

Investigative outlets (e.g., MuckRock) have documented that federal agencies are testing AI in FOIA processing and that transparency about these pilots is uneven.<sup>5 6</sup> Independent reporting and program materials from records professionals also document both potential and risks, including overredaction, privacy exposure, and accountability gaps if proprietary systems are adopted without auditability.<sup>7</sup>

The net result is predictable: slower response times, higher litigation exposure, and diminished public trust.

A policy intervention that couples modest, auditable NLP with human oversight can address the mechanical workload and free FOIA officers to focus on legal judgments and exemptions.

### **Policy Recommendation**

This proposal recommends the Department of Justice's (DOJ) Office of Information Policy (OIP), in coordination with OMB and a small set of pilot agencies, authorize a twelve-month FOIA Accelerate pilot focusing on four narrowly scoped NLP applications:

1. Routing classifier: a lightweight, supervised classifier trained on historical intake logs to suggest the correct component or to flag multicomponent requests at intake. Correct routing on day one reduces handoffs and idle time.
2. PII-aware redaction suggestions: a conservative PII detector composed of pattern matchers and named-entity recognition (NER) that surfaces candidate spans and justification text for human reviewers. The system should favor recall (see glossary for recall definition) for sensitive identifiers and require human approval for every redaction.
3. Deduplication clustering: semantic clustering of requests and candidate-responsive records to collapse redundant effort where many near-duplicate requests target the same records.
4. Plain-language summaries: Retrieval-grounded, citation-preserving extractive summaries of technical documents to reduce clarification rounds and help FOIA officers triage long documents.<sup>7</sup>

### **Key governance features:**

Every automated suggestion is advisory and must be approved by a human; systems must publish machine-readable model cards and a risk registry; output and reviewer actions are immutable-logged for audit; the pilot aligns with NIST AI RMF and the Generative AI profile; and OMB Circular A-130 requirements for privacy and records management are observed.<sup>8</sup> These safeguards respond directly to practitioner concerns reported in news and professional outlets.

In line with GAO's findings on tech-driven backlog reduction and DOJ/OIP FY2024 statistics showing record-high demand, the pilot aims to cut participating offices' backlogs by at least 25 percent and reduce mean time to first response by ~20 percent over twelve months, focusing on intake/routing, deduplication, and evidence-preserving redaction (see Appendix A).<sup>3 4</sup>

This proposal recommends launching, with DHS, Veterans Affairs, Health and Human Services, and the Department of State, four high-volume departments with diverse record types and measurable backlogs, which together provide rigorous test beds for first-party identity records, health/regulatory records, and complex historical correspondence (see Appendix B).<sup>9</sup>

### **Implementation Plan**

The pilot proceeds in four phases.

- Phase 0 (Month 0–1): Governance. DOJ OIP issues a pilot charter; convenes an ethics/FOIA+AI board with agency FOIA officers, privacy counsel, and civil liberties advisors; and completes privacy impact assessments.
- Phase 1 (Month 1–3): Data and Baselines. Agencies provide sanitized, anonymized intake logs and example responsive documents where feasible; the team builds labeled routing sets (5–10K items) and constructs synthetic PII corpora and gold-standard redaction samples for evaluation.
- Phase 2 (Month 3–6): A Minimum Viable Product (i.e. the most basic version with just enough core features to be usable) Development: Engineers ship baseline modules (term frequency–inverse document frequency (TF-IDF)/logistic routing, regular expressions–named-entity recognition (regex+NER) redaction, TF-IDF deduplication clustering, extractive summarizer). Models are kept small and auditable (e.g., DistilBERT only where necessary) and deployed in Federal Risk and Authorization Management Program (FedRAMP) environments or agency graphic processing unit (GPU) clusters.

To ensure transparency and replicability, we provide a public-facing prototype repository ("FOIA Accelerate Repo") with modular code for routing, redaction, deduplication, and summarization, along with synthetic sample data and a demo notebook. This resource illustrates feasibility without using any sensitive government data.<sup>10</sup>

- Phase 3 (Month 6–12): Live Pilot and quality assurance (QA). Roll out the systems internally with A/B sampling, require human review for every case, run weekly QA sampling, and publish anonymized metrics on a public dashboard. An independent third-party reviewer (e.g., NARA/OGIS or GAO) conducts quarterly audits.
- Exit (Month 12): Independent evaluation determines whether to scale, pivot, or sunset the program.

Procurement can leverage small business set-asides or other transaction authority to speed implementation.

### **Costs and Benefits**

Estimated cost (twelve months): \$1.0–\$2.0 million across three agencies. Major line items: engineering and integration (\$600K), secure compute and hosting (\$300K), annotation/labeling (\$200K), privacy and legal compliance (\$200K), program management and evaluator fees (\$200K).

Benefits include measurable backlog reduction (even a 25 percent decline translates to tens of thousands of cases), fewer FOIA lawsuit filings and associated costs, improved processing time, and a public demonstration of responsible AI adoption. The open-source evaluation artifacts and model cards reduce vendor lock-in and enable state/local replication. Intangible benefits include improved public trust and a lower risk of errant disclosures through human oversight.

### **Evaluation Metrics**

Success metrics should be both quantitative and qualitative.

Quantitative:

- Backlog reduction  $\geq 25\%$  in pilot components within twelve months
- Mean time-to-first-response reduced  $\geq 20\%$
- Routing top-1 accuracy  $\geq 90\%$  on labeled test sets
- PII redaction audit: precision  $\geq 95\%$ , recall  $\geq 90\%$  on gold samples
- Deduplication collapse ratio: percent of redundant effort eliminated  $\geq 30\%$

Qualitative:

- FOIA officer and requester satisfaction surveys
- Independent auditor (OGIS/GAO) report on process fidelity, error rates, and fairness checks

Quarterly anonymized dashboards should be published, subject to privacy constraints, to ensure public accountability.

### **Conclusion**

FOIA Accelerate is a conservative, governance-first application of NLP to a pressing administrative problem.

By restricting automation to clearly delimited tasks, requiring human review at every step, publishing open evaluations, and aligning with existing governance frameworks, the federal government can reduce backlog, improve timeliness, and preserve legal safeguards.

The accompanying FOIA Accelerate repository (see endnote 10) provides a proof-of-concept baseline, enabling agencies, researchers, and auditors to examine the approach and replicate tests on synthetic data.

The pilot emphasizes auditability and replicability rather than speculative performance claims. Success would demonstrate that AI could strengthen democratic transparency without ceding human accountability.

### **Appendix A: Assumptions, Targets, and Cost Model (Pilot Year) Baselines**

- Government-wide demand reached ~1.5M FOIA requests in FY2024, with major departments experiencing 30%+ increases over FY2023. Large requesters such as DHS and VA reported substantial increases and sizable backlogs.<sup>2,9</sup>
- Target 1: Backlog reduction  $\geq 25\%$ . Evidence from document-processing automation shows productivity gains above 100% in classification and redaction tasks; GAO attributes persistent FOIA backlogs partly to technology gaps. To be conservative, this paper targets a 25% reduction.<sup>3,5</sup>
- Target 2: Mean time to first response improvement ~20%. Automated routing and deduplication reduce time in queue. DOJ reports ongoing timeliness challenges despite improvements, so a 20% average improvement is ambitious but grounded.
- Cost model. Peer agency reports (e.g., FDIC FY2023: 13 FTE, \$2.48M cost) illustrate typical FOIA cost scales. Pilot budget line items include engineering and integration (~\$600K), secure compute and hosting (~\$300K), annotation/labeling (~\$200K), compliance (~\$200K), program management (~\$200K).
- Total: \$1–\$2M across three agencies, well within reported program costs.<sup>8</sup>

### **Appendix B: Pilot Agency Selection Rationale**

- Criteria: high volume, diverse record types, multiple components, measurable backlogs, transparent reporting
- DHS: Highest volume; ~142,000 backlog at end of FY2024
- VA: One of the largest numeric increases in requests in FY2024; many first-party health records (e.g., under VHA)
- HHS: Complex health/regulatory records; backlog strategies reported in FY2024 report
- State: Large, complex, historically backlogged sets; steady litigation; suitable for citation-preserving review

## Glossary of Terms

- Personally Identifiable Information (PII): Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual
- Regex (regular expression): Pattern-matching rules for text, used here for detecting PII
- TF-IDF: Term frequency–inverse document frequency, a statistical way to weigh word importance
- NER: Named-entity recognition, an NLP method to detect people, dates, IDs
- Recall: The fraction of true positives found; prioritized to avoid missing sensitive information. A recall-first stance (find everything that might be responsive/sensitive, then filter) aligns with FOIA's exemptions and harm tests. See OIP guidance on backlog reduction and timeliness metrics that still preserve statutory requirements: <https://www.justice.gov/oip/oip-guidance/guidance-backlog-reduction-plans>
- Precision: The fraction of predictions that are correct; balanced against recall
- BM25: A retrieval algorithm for finding relevant documents
- NARA: National Archives and Records Administration, records steward
- OGIS: Office of Government Information Services, FOIA ombudsman
- GAO: Government Accountability Office, congressional watchdog agency
- NIST AI RMF: National Institute of Standards and Technology Artificial Intelligence Risk Management Framework. The NIST AI Risk Management Framework (AI RMF) is a voluntary, flexible guideline from the National Institute of Standards and Technology (NIST) that helps organizations identify, assess, and manage risks in artificial intelligence (AI) systems
- Natural Language Processing: is a field merging computer science and linguistics, enabling computers to understand, interpret, and generate human language (text and speech)
- DOJ: The U.S. Department of Justice
- DOJ OIP: The United States Department of Justice Office of Information Policy, the U.S. government office responsible for overseeing and guiding federal agencies on their compliance with the Freedom of Information Act and the Privacy Act
- VA: The U.S. Department of Veterans Affairs, a government agency that provides services to veterans
- VHA: The Veterans Health Administration, the largest integrated healthcare system in the U.S., responsible for providing medical and social support services to eligible American military veterans
- FDIC: Federal Deposit Insurance Corporation, is an independent government agency that maintains stability and public confidence in the nation's financial system by insuring deposits in the event of a bank failure
- FDIC FTE: refers to the Full-Time Equivalent (FTE) staffing levels at the Federal Deposit Insurance Corporation. FTE is a unit of measurement used in budgeting, human resources, and project management to count the number of employees based on total hours worked.

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# Allied Mettle, Allied Metals: A Market-Based Playbook for Critical-Mineral Supply Chains

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“We have to win this race [...] because if you think about a democracy, we have the guardrails. [...] We can[not] afford to have these transformative technologies pioneered by authoritarian regimes.” —Former Secretary of State Condoleezza Rice<sup>1</sup>

“Liberal democracy’s ability to incubate innovation, technology, culture[,] and sustainable growth [...] will determine the geopolitics of the future.” —Francis Fukuyama<sup>2</sup>

## Introduction

The United States has invented the technologies that power the modern world, but it imports over two-thirds of the critical minerals required to manufacture them from its primary strategic competitor.<sup>3</sup>

Despite pioneering the Internet,<sup>4</sup> electric vehicles,<sup>5</sup> and renewable energy systems,<sup>6</sup> the United States has ceded control of the supply chains that sustain each of them: China now commands 87 percent of global rare earth refining capacity, produces over 97 percent of anode-active material capacity,<sup>8</sup> and accounts for 99 percent of primary gallium production: not through superior innovation, but through coordinated technological policy that democratic procurement and finance have yet to counter.<sup>10</sup>

This dependency challenges a core assumption: that democratic capitalism can outcompete authoritarian state control in strategic industries. Indeed, beginning in 1945, reinforced institutionally by the National Science Foundation Act of 1950, the United States built a public-private research system that repeatedly delivered frontier (albeit general-purpose) technologies through market-driven entrepreneurship, competitive universities, and venture capital networks that reward technological breakthroughs.<sup>11</sup> By 1960, it was financing roughly 69 percent of the world’s research and development (R&D).<sup>12</sup> That dominance has, since, eroded markedly: By 2019, the U.S. share of global R&D stood near 27 percent (with China at about 22 percent), and by 2020 it was barely 28 percent on alternative international series.<sup>13</sup> And, now, in the strategic inputs that make modern systems work—the “vitamins of modern technology”<sup>14</sup>—China’s sheer advantage in coordination sets the terms of trade. When Beijing imposes licensing or export controls (as it did in December 2024 on gallium, germanium, and antimony, and in April 2025 on a tranche of medium and heavy rare earth elements), it successfully converts commercial concentration into geopolitical leverage.<sup>15</sup>

The empirical record (still) favors democracies on innovation and long-run growth:<sup>16</sup> Countries that democratize also realize large, persistent gains in income per capita over the subsequent decades, and advanced democracies continue to dominate global innovation benchmarks.<sup>17</sup> Even so, the institutions that reward discovery do

not automatically translate into capacity at scale in strategic inputs, and defense-driven demand is far too small, by itself, to reprice global materials markets.<sup>18</sup> The task is not to mimic authoritarian direction; it is to translate strategic objectives into market incentives and allied scale.

To that end, this proposal section advances four recommendations: **firstly**, to price verifiable supply chain security inside best-value source selection; **secondly**, to stand up Allied Processing Investment Supports (APIS) that pair tax credits with long-dated offtakes and price collars; **thirdly**, to adopt a single Provenance-Ownership-Audit (POA) template that turns statutory duties into auditable practice; and, **fourthly**, to designate one federal lead agency to keep a stage-specific processing list that aligns programs across agencies and with allies. Together, these steps align market incentives with security, crowd in private capital, and build a verifiable allied backbone without abandoning the guardrails that distinguish any democracy.

## Analysis

Three structural failures—namely, (i) mispriced security, (ii) insufficient demand leverage, and (iii) capital scarcity reinforced by strategic predation—explain how and why history’s most innovative democracy remains dependent on China. The PRC, in turn, has made each of these weaknesses an advantage by overbuilding processing capacity to flood markets, driving prices down with subsidies to eliminate competitors, then acquiring distressed assets and intellectual property to control entire supply chains.<sup>19</sup> In fact, China has invested more than \$16 billion annually in mining capacity since 2014 and, for several materials, now commands well over 90 percent of midstream processing.<sup>21</sup>

The problem originates in perverse incentives wherein resilience premia are treated as costs to avoid rather than as value to secure.<sup>22</sup> “We incentivize the defense primes’ performance based on cost,” explains one Pentagon official. “There [is] a mismatch between political intent and economic incentive structure.” In one documented case, a major defense contractor traced a titanium supply chain thirteen tiers down, discovering direct dependence on “Chinese mines, Chinese roads, and Chinese trucks.” When the firm disclosed these findings to the Department of Defense, officials penalized it for delays caused by the investigation itself—a perverse incentive that discouraged future transparency even as Chinese-sourced materials continued flowing into critical defense systems.<sup>23</sup>

China’s sheer overcapacity is already exemplified by a gallium collapse in Europe: As subsidized Chinese exports surged between 2014 and 2016, gallium prices fell approximately 75 percent, forcing the Germany-based Ingal Stade GmbH—the continent’s last producer—to shutter operations in 2016. After China announced licensing controls in July 2023 and subsequently banned exports to the United States in December 2024, external prices surged dramatically from \$110–\$130 per kilogram to \$687 per kilogram by May 2025: a show of “weaponized uncertainty,” according to one U.S. industrial commentator.<sup>24</sup> Once rival companies ceased operations, China raised prices again and, thus, cemented asymmetric control over a critical bottleneck.

Meanwhile, responsibility for “critical” materials disperses across a veritable “spaghetti monster”: a tangled web of overlapping authorities, inconsistent reporting standards, and fractured information-sharing protocols spanning more than forty governmental offices, with coordination remaining episodic rather than continuous.<sup>25</sup> “We need a shared map and a shared playbook,” demands one Interior Department official interviewed for Stanford University’s Gordian Knot Center for National Security Innovation. “Right now, each agency is optimizing its own corner.” Even when intent aligns, divergent federal lists and designations have blurred priorities and impeded execution.<sup>26</sup> Across the shifting categories that different missions require, no clear federal leader coordinates the response.<sup>27</sup>

These institutional failures compound as institutional investors read these signals and withdraw unless bankable demand materializes. In other words, “private capital does not [even] want to touch it,” explained one institutional investor to the Gordian Knot Center. “Permitting takes too long[,] costs more[,] and the track record is poor.” Offtake agreements remain thin, permitting proceeds slowly, and the credible threat of dumping can strand projects mid-development. The Pentagon’s consumption cannot move world markets because defense demand for rare earths and similar inputs represents less than one-tenth of one percent of global use. Scale completes the argument: “We are not in the driver’s seat in these markets,” noted a defense acquisitions team. “We make twelve fighter jets monthly while Tesla produces [nearly 5,000] electric vehicles daily.”<sup>28</sup>

The outcome is structural underinvestment in Western processing and persistent vulnerability that can be activated by policy decree. By mid-2025, China’s controls covered at least sixteen minerals and alloys, and the strategic signal had become unambiguous: Commercial concentration could be converted into geopolitical leverage at will.<sup>29</sup> As one former National Security Council member avers, “The CCP has attempted a plan of asymmetrical dominance. As a result, they will utilize this strength against the United States without hesitation.”<sup>30</sup>

## **Recommendations**

The United States can reconcile strategic intent and market behavior without abandoning competitive procurement or allied trade.

To that end, one recommendation is to price supply-chain security inside best-value source selection rather than relying on waivers. Existing law already permits trade-offs among cost, schedule, and other factors when it serves the government’s interest, and Defense Department guidance discourages lowest-price-technically-acceptable methods for complex or mission-critical buys.<sup>31</sup> Making a clearly weighted “security” factor part of each evaluation—scoring verified allied processing, stage-specific provenance from mine to magnet, and beneficial ownership—aligns practice with statute: Beginning January 1, 2027, the restriction applies across the entire U.S. chain for covered magnets, including those containing neodymium.<sup>32</sup> These rules justify awarding to chains that can prove origin and ownership even when they are not the absolute lowest price.

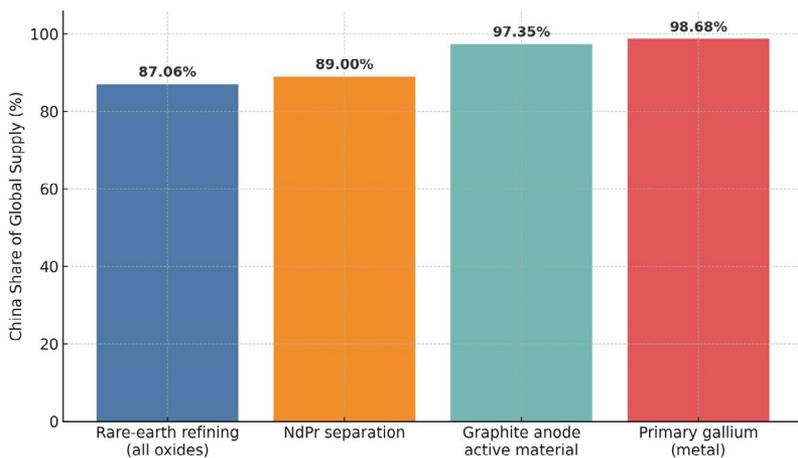
Another recommendation is to make Allied Processing Investment Supports the financing template that operationalizes the “three-pillar strategy” of Interior Secretary (and Chairman of the National Energy Dominance Council [NEDC]) Doug Burgum for critical-mineral security: first, strategic stockpiling during price wars; second, sovereign risk insurance through loan guarantees; third, direct equity investment backing. Specifically, APIS pairs the Defense Production Act’s (DPA) Title III offtakes and calibrated price collars with the Inflation Reduction Act’s (IRA) Section 45X production credit.<sup>33</sup> That credit lowers unit costs once plants are producing, which is particularly effective given that the Treasury Department’s October 2024 final rules now include mining and extraction costs in production cost calculations.<sup>34</sup> APIS covers projects across the expanded 2025 draft list (especially copper, silver, potash, silicon, rhenium, and lead), providing the much-needed, science-based roadmap for reducing dependence on foreign adversaries that Secretary Burgum has championed.<sup>35</sup>

The third recommendation is to enforce a single Provenance-Ownership-Audit standard across grants, tax credits, stockpiling, and procurement. The template should require lot-level identifiers; smelters’ and refiners’ IDs and addresses; stage-by-stage attestations from mine through separation and refining to metals and alloys, as well as finished parts; and beneficial-ownership disclosures, with risk-based third-party audits. The Government Accountability Office has shown that fragmented lists, uneven reporting, and inconsistent verification blur priorities and drive costs higher; a single evidentiary standard remedies that defect and gives the 2027 magnet rule practical effect.<sup>36</sup>

The fourth and final recommendation is to designate the Interior Department, under NEDC coordination, as the lead coordinator for critical materials strategy, leveraging Secretary Burgum’s leadership of both bodies to maintain one stage-specific processing list and align procurement, Section 45X, Title III, stockpiling, and trade tools to that framework.<sup>37</sup> The NEDC should work through the Minerals Security Partnership (MSP), the Australia-U.S. Ministerial Consultations (AUSMIN), and the U.S.-Australia Critical Minerals Compact to publish shared commissioning schedules and joint financing targets.<sup>38</sup>

## **Methods and Metrics**

Evaluation should be quarterly, public, and tied to automatic course correction. The greatest exposure lies in midstream stages: As Figure 1 below illustrates, China’s control of key processing stages ranges from 87 percent of rare earth refining to over 98 percent of primary gallium production, with similarly dominant positions in neodymium-praseodymium (NdPr) oxide separation and graphite anode active material.<sup>39</sup>



**Figure 1. China's concentration in key midstream stages (2024–2025)**

Shares use the latest year available and are shown to two decimals: (i) 87.06 percent for rare earth refining is calculated from Natural Resources Canada's 2022 refined output (175,000 divided by 201,000); (ii) 89.00 percent for rare-earth-oxide separation (including neodymium and praseodymium) is reported by the U.S. Department of Energy; (iii) 97.35 percent for anode-active-material capacity is an author's point estimate derived as follows: The International Energy Agency states that China holds "over 97 percent" of installed capacity; public 2024 shipment data indicate that producers outside China shipped roughly forty thousand to sixty thousand metric tons out of about 2,111,000 metric tons of global anode shipments, implying a China production share between 97.1 percent and 98.1 percent; because facilities outside China were ramping up and operated below nameplate capacity in 2024, capacity shares lie toward the lower portion of that band, so I adopt the midpoint of the capacity-consistent 97.1 percent to 97.6 percent interval, namely 97.35 percent. And, (iv) 98.68 percent for primary gallium is computed from United States Geological Survey 2024 estimated totals (750,000 divided by 760,000 kilograms). See especially Government of Canada, Natural Resources Canada, "Rare Earth Elements Facts," last modified December 20, 2024, <https://natural-resources.canada.ca/minerals-mining/mining-data-statistics-analysis/minerals-metals-facts/rare-earth-elements-facts>; Braeton J. Smith et al., Rare Earth Permanent Magnets: Supply Chain Deep Dive Assessment (U.S. Department of Energy, 2022), esp. Table 5; International Energy Agency, Global EV Outlook 2024 (IEA, 2024) <https://www.iea.org/reports/global-ev-outlook-2024>; Global Critical Minerals Outlook 2024 (International Energy Agency, 2024), <https://www.iea.org/reports/global-critical-minerals-outlook-2024>; and United States Geological Survey, "Gallium," in Mineral Commodity Summaries 2025 (U.S. Geological Survey, 2025), 1–2, <https://pubs.usgs.gov/periodicals/mcs2025/mcs2025-gallium.pdf>

For program-critical forms, such as neodymium magnet blocks, graphite anode active material, battery-grade manganese sulfate, antimony trioxide, battery-grade silicon, and copper rod, the United States should publish the allied and U.S. share of domestic demand by stage and track import-source concentration indices.<sup>40</sup>

Optimum efficacy in financing necessitates the tracking of final investment decisions, commissioned timelines, and realized prices against collar boundaries for each APIS contract. Two consecutive quarters outside price collars should trigger contract reviews; chronic delays should prompt milestone audits under DPA Title III authority. Strategic stockpiling metrics should include material volumes purchased during price-manipulation events and inventory levels relative to 180-day consumption benchmarks.<sup>41</sup> Compliance visibility, too, becomes critical as the 2027 magnet restrictions take full effect.<sup>42</sup> Finally, allied coordination should generate measurable joint projects, not merely diplomatic statements. Updates vis-à-vis the MSP and AUSMIN, in particular, should list cofinanced midstream facilities, stages, commissioning dates, and shared stockpiling commitments.<sup>43</sup>

## Conclusion

Congressional proponents of industrial policy—alongside other critics—may controvert, perhaps reasonably, whether market-based incentives can counter China’s coordinated strategy fast enough. After all, expanding production tax credits could cost \$12–\$15 billion over five years, and supply-chain auditing may increase procurement timelines.<sup>44</sup> These concerns deserve consideration. However, continued dependence on an adversary that weaponizes commercial concentration imposes far greater costs. Pre-existing vulnerabilities may disable critical systems within months of supply cutoffs, yielding hundreds of billions of dollars in emergency sourcing costs.<sup>45</sup>

The deeper issue transcends any single material. In the spirit of Secretary Rice and Mr. Fukuyama, democracies cannot cede transformative technologies to authoritarian control—a principle that extends to enabling supply chains. The four recommendations in this proposal evince that the United States need not choose between market competition and strategic security. Aligning procurement incentives with verifiable provenance, scaling allied financing, and coordinating transparent standards can restore democratic competitive advantage.

The expected result is measurable strategic autonomy: In defending the techno-industrial policy that powers democratic innovation, such reforms will, ultimately, power democracy itself.

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