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Capability white paper · prepared for OPM RFI1819329 · Demonstrates existing capabilities. This is not the formal RFI response; the 5-page response and pricing were submitted separately through the GSA feedback form.

Advanced eLearning for the Federal Human Resources Workforce

White Paper Response to RFI RFI1819329 (GSA OCAS, FAR Part 10 Market Research)

Respondent: American Public Training LLC d/b/a Graduate School USA (GSUSA)

Address: 1050 Connecticut Ave NW, Suite 500, Washington, DC 20036 |

graduateschool.edu **Single accountable POC:** Patrick Pearce,

patrick.pearce@graduateschool.edu, 202-314-3524 **UEI** LA83MCFN1ST3 | **CAGE** 99AA0

| **Business size** Large | **GSA MAS** 47QRAA24D004K (03/02/2024-03/01/2029)

OPM asks each respondent to identify itself and confirm acquisition readiness (SOW 1.1-1.7). GSUSA answers with one verified identification block, an already-awarded ordering vehicle, a federal-HR catalog that already teaches the work, and a live demonstration platform, so OPM can move from market research to a placed order without standing up a new contract action and without waiting for content to be invented. **Feature:** GSUSA holds an active GSA MAS award (47QRAA24D004K) under both the training and consulting SINs this work requires, sitting on a century-deep federal-HR institution with the courses, faculty, and platform already in production. **Benefit:** OPM can place a task order or BPA call against an existing vehicle, against a vendor that already owns the content, the instructors, and a running LMS, so neither the contract action nor the content build gates the schedule; the same vehicle covers content conversion (611430) and the LEH, FAB, and competency program-management work (541611). **Proof:** the MAS award is on record at GSA eLibrary for 03/02/2024-03/01/2029 under SINs 611430 and 541611 (<https://www.gsaelibrary.gsa.gov>); GSUSA's homepage states 125+ federal agencies served, more than one million federal employees trained, 200+ subject-matter experts, and 400+ courses and certificates (<https://www.graduateschool.edu/>).

Item	GSUSA response
Primary NAICS	611430, Professional and Management Development Training (the RFI's core scope)
MAS SINs awarded	611430 (training, course development, learning management) and 541611 (management consulting, program management). GSUSA holds

Item	GSUSA response
	both; the two SINs cover the full scope of this requirement, so no SIN 611710 addition is needed.
Business size under each NAICS	Large under 611430 and 541611
Socio-economic status	Large business; no set-aside designation claimed
Submission method	GSA feedback form per SOW 1.1 (not email or eBuy)
Pricing and Tier 1/Tier 2 artifacts	Attached separately per SOW 1.9-1.10; this paper carries capability and identification narrative only

Procurement-readiness callout. OPM needs a path that lowers acquisition-timeline risk for a 34,000-learner, 15-area conversion. GSUSA has trained the federal workforce since 1921 (founded as the USDA Graduate School), has served 125+ departments and agencies, fields 200+ subject-matter experts who are former federal executives, managers, and technical specialists, and holds ACCET accreditation (a Department of Education-recognized body). The federal HR catalog already covers thirteen of the fifteen functional areas with live, named courses; the LMS that delivers them runs in production today with developed courses GSUSA can demonstrate this week. The ready MAS vehicle sits on a century-deep federal-HR institution with the content, faculty, and platform in hand, not a new market entrant. Section 508 / WCAG 2.1 AA accessibility is a hard authoring gate on every learner-facing deliverable, detailed below. Sources: <https://www.graduateschool.edu/about-us> and <https://www.graduateschool.edu/>.

Section 1: Vision for the Federal HR Training Challenge

OPM’s HR 2.0 goal is to develop each HR competency once and deliver it many times across the 34,000-person core HR workforce, with proficiency measured by what learners do on the job, not by courses finished. **Feature:** GSUSA already owns a federal-HR catalog built and refined continuously since 1921, anchors every module to a measurable performance outcome and to its governing authority (5 U.S.C., 5 C.F.R., MSPB practice, Douglas factors, Merit System Principles), then instruments whether learners reach that outcome through scenario simulation, graded application, and recorded decision paths. The delivery platform records ten learning-record kinds per learner on one timeline and rolls them into cached SQL analytics across pass rate, mastery, and engagement, calibrating designed-versus-actual seat time from real player heartbeats. **Benefit:** OPM

gets develop-once/deliver-many proven in production and defended by evidence, backed by content and faculty that already exist, not by claimed course volume. **Proof:** the platform runs GSUSA as a live tenant today, with time data that excludes graduateschool.edu staff so the calibration reflects real learners; the homepage records 400+ courses and certificates and 200+ subject-matter experts behind that catalog (<https://www.graduateschool.edu/>).

Anchor strength. GSUSA’s instructional design is experiential and outcome-based, not lecture-and-quiz. Our Center for Leadership and Management (founded 1995) runs an ECQ-aligned cohort model with three-day SES shadow assignments in the Executive Potential Program, and a century of federal-HR delivery across 125+ agencies means every module begins from a job-performance outcome and a controlling authority, then proves mastery, not seat time. Sources: <https://clm.graduateschool.edu/epp.php> and <https://www.graduateschool.edu/about-us>.

The map below ties each OPM interest to the solution element that delivers it and the section that details it.

OPM interest (SOW)	GSUSA solution element	Detail
Develop-once/deliver-many modular content (2.4)	Curriculum authored as portable YAML in Git, composed into recombinable 1-6hr modules, each with estimatedMinutes; Government owns the source	Sec. 2
Refine AI/FAB drafts, not build from zero (3.3)	13 of 15 areas taught today as live graduateschool.edu courses; proven content converts to adaptive eLearning	Sec. 3
LEH estimation and 40-50% reduction (3.4)	Designed-vs-actual seat-time report from real heartbeats, CSV-exportable	Sec. 3
AI HR Coach, no hallucination (2.5-2.6)	Coach answers only from authored curriculum and 4-tier authorities, behind a deterministic substring citation gate	Sec. 2
3-tier credentialing and proof-of-skill (5.3)	Track + TrackRequirement + CertificationExam + ExamResult with evidence upload; Open Badges 3.0 issuer	Sec. 5

OPM interest (SOW)	GSUSA solution element	Detail
Automated tracking and reporting at scale (2.3)	10-kind learner timeline, cached SQL analytics, per-agency CSV/PDF rollups	Sec. 3-4
No vendor lock; Government owns content/records (2.8)	Learning happens in the GSUSA LMS; Government owns content (YAML in Git) and records (open CSV/PDF, xAPI/cmi5/SCORM), with API flow to OPM systems	Sec. 4
Standards (xAPI/cmi5/SCORM) + ADL-Net 2027 (4.1-4.2)	Records in an LRS-shaped event store now; focused weeks-long internal conformance build, no third party; API to OPM's LRS	Sec. 4
Live demonstration (4.3)	GSUSA-hosted tenant is built and seeded TODAY with developed courses; virtual demo runnable now	Sec. 4

Section 2: Recommended Technical and Instructional Architecture

OPM needs one coherent architecture covering SOW 2.2 through 2.9 in shipped code, not slideware, backed by content that already exists. GSUSA proposes that learning happen in the GSUSA-hosted LMS (the Noble LMS, live at learn.classesportal.com with graduateschool.edu a branded tenant), an approach SOW 4.2 expressly invites by allowing vendors to leverage their own LMS, with content authored as portable Git-owned YAML and learning records held in an LRS-shaped event store that connects by API to OPM's systems and the future ADL-Net Governmentwide LMS. The Government owns the content it funds and 100% of the learner records, with GSUSA's pre-existing catalog and platform licensed for the engagement; the GSUSA LMS is where the learning happens, not where the data is trapped.

Learning experience architecture and Learning Record Store for asynchronous scale (2.2). OPM must track 34,000 HR specialists learning asynchronously with no grader per learner. **Feature:** the platform records every learning event the RFI cares about in a generic actor/verb/object/context/timestamp store (ActivityLog), plus a unified per-learner timeline (getEngagementEvents) that normalizes ten record kinds (lesson completion, exam started/submitted/graded, assignment submitted/graded, AI question, login, enrolled, course activated), filterable by learner, course, agency, and date. That structure is an xAPI statement minus the serialization profile. For scale, the platform runs separate user-facing and background connection pools, deep health probes, scheduled

crons, and an offloaded Cloud Run media worker. **Benefit:** the system self-paces for a 34,000-learner population, records are LRS-equivalent today, and the same records flow by API to OPM's LRS and the future Governmentwide LMS. **Proof:** getEngagementEvents and the ActivityLog model are verified in the codebase; native xAPI/cmi5/SCORM emit is an in-house adapter over this store, not a re-architecture and not a third-party stack (see Section 4).

Develop-once, deliver-many with automated tracking and assessment (2.3). OPM needs ~2,176 Mastery Hours converted to roughly 1,200 reusable eLearning hours at a defensible per-learner cost. **Feature:** content is authored as per-lesson and per-module YAML units, each carrying estimatedMinutes and sourcePath, then composed into courses and recombined into Tracks. Assessment runs end to end: a unit-tested six-question-type engine (multiple choice with partial credit, true/false, short answer, Likert, matching, ranking) auto-scores objective items on submit, and an AI formative coach rates open-ended HR judgment on a developing/proficient/strong rubric. Every score change writes to an append-only GradeAdjustment ledger with actor and reason. **Benefit:** OPM gets automated tracking with the quality-governance audit trail ACCET accreditation and FAB validation expect. **Proof:** estimatedMinutes (course-content.ts:732) and the GradeAdjustment model (schema:5757) are confirmed; the designed-vs-actual course-time report (course-time-report.ts) computes outlier-trimmed median completer time per unit.

Modular, recombinable 1-6 hour content, not fixed courses (2.4). OPM wants short building blocks that isolate, sequence, and recombine. **Feature:** each lesson and module is an independently versioned, time-estimated YAML file; the Track model recombines whole courses with sequencing, prerequisites, and elective pools (min/max count and hours); scenario, branching, and branching_multi decision-tree blocks present realistic HR practice and record each learner's chosen path in LessonAnswer; sequential-lock gating opens content as prerequisites complete. **Benefit:** a module built for one area drops into any pathway with no rebuild, exactly the develop-once model OPM specified. **Proof:** the scenario/branching/branching_multi block types and the Track/TrackRequirement/TrackElectivePool models are verified in the schema; the Employee Relations beginner/intermediate/advanced drafts map onto tagged, recombinable modules rather than monolithic courses, and the live ER Basic and Intermediate courses (<https://www.graduateschool.edu/courses/federal-employee-relations-basic/>) supply the source content.

AI HR Coach grounded in vetted authorities (2.5). OPM requires an AI HR Coach that cannot hallucinate beyond vetted authorities, for enrolled and unenrolled users. **Feature:** the shipped coach grounds every answer in authored curriculum and admin-curated sources via the Citations API, then applies a deterministic non-LLM grounding gate

(isCitationGrounded) that confirms each cited span literally appears in its source and drops any that fails before the learner sees it. Three further guardrails wrap each turn: a preamble forbidding invented links or tools, a sub-millisecond exam-answer-leak detector that redacts mid-stream, and a Tier-1 verbatim path returning reviewer-approved answers with no model call. Responsible-AI cost control is built in: an admin-configurable daily spend cap, auto-downgrade to a cheaper model at 90% of cap, rate limits, and per-message token/cost audit. **Benefit:** the gate holds 100% of the time rather than relying on model judgment, and OPM controls spend. **Proof:** isCitationGrounded (citations.ts:33) ships with unit tests; the downgrade-at-90% / cap-at-100% logic is verified in config.ts. GSUSA already fields an AI-for-Federal-HR course family (classification, benefits, performance, employee relations, AI governance and compliance), so the coach grounds on content GSUSA already authored.

Authority and artifact linkages (2.6). OPM requires every output to trace to its governing authority and job aid. **Feature:** knowledge sources carry a four-tier authority field (primary/official/recommended/supplementary) with retrieval-boost weights, so statute and OPM guidance outrank secondary material and a blog post never overrides a 5 C.F.R. provision; the same enum renders as an accessible zero-JavaScript on-slide “Sources” footer with a precise locator (for example a CFR section); resource blocks attach checklists and job aids per lesson. **Benefit:** each objective links to its controlling 5 U.S.C., 5 C.F.R., EO, OPM memo, checklist, or job aid, tagged by tier. **Proof:** the authority enum is verified in the assembler (assembler.ts:149) with citation tests.

Creative instructional blend and competency alignment (2.7, 2.9). OPM wants modern, performance-outcome learning aligned to its HR Competency Model and Career Path Guide. **Feature:** the platform delivers adaptive pathways (sequential-lock plus branching trees), scenario simulations with recorded decision paths, evidence-gated proof-of-skill, per-module mastery dials, and an analytics suite (Overview, Engagement, Courses, Exams, Course-time, AI). The credentialing backbone (Track type certification, sequenced TrackRequirement with prerequisite gating, CertificationExam, per-learner ExamResult with evidenceUrl and blocksTrackCompletion) turns entry/intermediate/advanced into three gated tracks per area. GSUSA’s existing certificate spine already proves the competency-alignment discipline: the cFHRP, cFHRA, and cFHRBP three-level ladder is explicitly aligned to OPM’s HR Management Competencies (<https://www.graduateschool.edu/human-resources-certificates>). **Benefit:** OPM gets the FAC-style three-tier model as configuration over shipped infrastructure, mapped to OPM competencies the way GSUSA’s certificates already are. **Proof:** every named field is verified in the schema (Track:6411, TrackRequirement:6518, CertificationExam:6598, ExamResult:6683). A first-class competency tag and a competency taxonomy table are not yet modeled; because every module is an

addressable, versioned unit, GSUSA builds this quickly as metadata and emits the crosswalk. Sample (Employee Relations, from the OPM draft modules):

Competency (OPM HR Model)	Tier	Module (recombinable unit)	Governing authority (primary)
ER legal framework	Entry	ER Legal Authorities / MSPs / PPPs / MSPB Overview	5 U.S.C. 2301-2302; Merit System Principles
Conduct vs performance	Entry	Conduct vs Performance I; Douglas Factors Basics	5 C.F.R. 432, 752; Douglas factors
Due process and adverse action	Intermediate	Due Process: Notice / Reply / Decision	5 U.S.C. 7513; 5 C.F.R. 752
Leave and medical issues	Intermediate	Leave / Attendance / FMLA / Medical Issues	5 C.F.R. 630; FMLA
Litigation readiness	Advanced	MSPB Litigation Readiness and Agency Record Strategy	5 C.F.R. 1201
Multi-forum enterprise risk	Advanced	Multi-Forum Risk: EEO / LR / OSC / MSPB / OIG / Privacy	29 C.F.R. 1614; 5 C.F.R. 1201

Vendor-lock avoidance and Government ownership (2.8). OPM must own all curriculum, content, and records on open standards. **Feature:** learning happens in the GSUSA LMS, as SOW 4.2 allows, but ownership stays with the Government: curriculum is plain human-readable YAML in a Git repository, assembled into versioned CourseContent stamped with its origin commit SHA; learner progress and assessment export to open CSV (RFC-4180 quoted, formula-injection-defanged) and server-rendered PDF from the same single-source aggregations shown on screen; per-learner FERPA/GDPR JSON export and codified retention windows (7y/1y/90d) ship; and records flow by API to OPM’s LRS and the future Governmentwide LMS in xAPI/cmi5/SCORM. **Benefit:** OPM gets the speed of a vendor LMS with none of the lock: the Government holds the content source and the learner records in open formats and can transition them wholesale at any time. **Proof:** sourceCommitSha (schema:2788) and the export paths are verified. Honest scope: native xAPI/cmi5/SCORM emit and an external LRS connection are not in the platform today (an internal 2026-04-24 decision deferred them as a deliberate sequencing choice). GSUSA builds the xAPI/cmi5 statement-forwarder in-house as an adapter over the existing event store, with zero third-party dependency, feeding OPM’s LRS now and the ADL-Net LMS by CY2027 (see Section 4). This is the no-

vendor-lock answer, not a deviation: nothing OPM funds is bound permanently to the GSUSA LMS.

All learner-facing deliverables ship Section 508 / WCAG 2.1 AA: captions and transcripts on video, tagged PDF/UA, keyboard and screen-reader operability, and color-independent design as a hard gate in the conversion playbook (~1,265 aria usages in code). A formal VPAT and axe-in-CI are committed fast adds.

Section 3: Functional Area Coverage and the Existing GSUSA Catalog

OPM needs one vendor that already teaches all fifteen HR functional areas and can convert that content into adaptive eLearning. **Feature:** GSUSA has fielded entry-to-advanced federal-HR curricula since 1921, and the published catalog covers thirteen of the fifteen areas today with real graduateschool.edu courses authored by instructors with decades of federal service; the remaining two are fast assemblies from modules GSUSA already teaches. **Benefit:** OPM refines proven instructor-led content rather than commissioning it from zero, which is the whole premise of develop-once/deliver-many. **Proof:** the coverage table below maps each area to live anchor content with course codes and URLs; the federal-HR catalog hub is <https://www.graduateschool.edu/topics/federal-human-resources-training>.

Course-library-to-15-areas crosswalk (named, live courses)

#	Functional area	Status	GSUSA anchor courses (code) and source URL
1	Classification	Have	Basic (IDCLAS7005), Intermediate (IDCLAS8300), Advanced (IDCLAS9200) Position Classification; Writing Federal PDs (IDCLAS7910); FWS Classification (IDCLAS8200); Classification for Supervisors (IDCLAS8102). https://www.graduateschool.edu/topics/federal-human-resources-training
2	Recruitment/Staffing/Placement	Have	Intro to Federal Staffing and Placement (IDSTAF7005); Category Rating and Selection (IDSTAF9010); RIF planning (IDSTAF7015, DoD IDSTAF7018); Veterans' Preference (IDSTAF8007). https://www.graduateschool.edu/courses/introduction-to-federal-staffing-and-placement
3	Employee Benefits	Have	CSRS/FERS Intro (IDBENE7300) and Intermediate (IDBENE8300); Retirement Bootcamp (IDBENE.P); FEHB for Administrators (IDBENE7305); pre-retirement line (FERS IDBENE7110, CSRS IDBENE7120).

#	Functional area	Status	GSUSA anchor courses (code) and source URL
			https://www.graduateschool.edu/topics/federal-human-resources-training
4	Foundational Federal HR	Have	Federal HR Management (IDPMGT7011); Guiding Principles (IDPMGT7202); cFHRP/cFHRA/cFHRBP certificate ladder mapped to OPM HR Management Competencies. https://www.graduateschool.edu/human-resources-certificates
5	Employee Relations	Have	ER Basic (IDLABR7110) and Intermediate (IDLABR8110); Adverse Conduct and Performance-Based Actions (IDLABR7100); FMLA for Supervisors (IDPMGT7510). https://www.graduateschool.edu/courses/federal-employee-relations-basic/
6	Labor Relations	Have	LR Basic (IDLABR7020) and Intermediate (IDLABR7021); Negotiating Federal Labor Agreements (IDLABR9001). https://www.graduateschool.edu/topics/federal-labor-relations-courses
7	Training and Development	Have	Federal Employee Development (IDCDEV7007); Instructor Training (IDCDEV9001); Instructional Design Essentials (IDADMB9006). Backed by the Center for Leadership and Management. https://www.graduateschool.edu/topics/leadership-management
8	HR for Supervisors and Managers	Have	HR Management for Supervisors and Managers (IDPMGT.P1); HR Compliance and Risk Awareness (IDPMGT7100); HR Execution and Decision-Making (IDPMGT8100), aligned to OPM's Federal Supervisory Training Framework. https://www.graduateschool.edu/topics/federal-human-resources-training
9	Performance Management	Have	Federal Performance Management (IDLABR7013); Managing Employee Conduct and Performance (IDLABR7011); AI for Employee Performance Management (IDTECH7045). https://www.graduateschool.edu/topics/federal-human-resources-training
10	Qualifications and Assessments	Have	Qualifications Analysis (IDSTAF7023); Job Analysis for Federal Hiring (IDSTAF8005).

#	Functional area	Status	GSUSA anchor courses (code) and source URL
			https://www.graduateschool.edu/courses/qualifications-analysis
11	Compensation	Have	Pay Setting GS (IDSTAF9002) and FWS (IDSTAF9004); FLSA Course (IDCLAS7100) and FLSA Bootcamp (IDCLAS.P1). https://www.graduateschool.edu/courses/pay-setting-general-schedule
12	Injury Compensation	Have	Workers Compensation and Disability Retirement (IDBENE8104): OWCP/FECA, CA forms, disability retirement under CSRS/FERS Handbook Ch. 60. https://www.graduateschool.edu/courses/workers-compensation-and-disability-retirement/
13	Competitive Examining	Have (build-fast DE tier)	Examining for FWS Jobs / job element method (IDSTAF7200); Category Rating and Selection (IDSTAF9010); competitive/excepted appointments inside IDSTAF7005. https://www.graduateschool.edu/courses/examining-for-federal-wage-system-jobs/ [CONFIRM: a dedicated OPM-style Delegated Examining certification-prep course is not clearly listed publicly; it builds fast from existing examining material.]
14	Executive Management	Have	CLM executive pipeline: ELP GS 11-13 (https://clm.graduateschool.edu/elp.php), EPP GS 13-15 with three-day SES shadow (https://clm.graduateschool.edu/epp.php), Washington Executive Seminar, all aligned to OPM ECQs. Strategic Human Capital Management (IDPMGT7015).
15	HR IT Management and Systems	Build-fast	Using and Presenting HR Data (IDSTAF8016); Federal Workforce Analysis and Planning (IDPMGT7013); Guide to Federal Personnel Recordkeeping (IDSTAF7035); AI Governance and Compliance for Federal HR (IDTECH8006); free eOPF/HR-analytics tutorials. https://www.graduateschool.edu/courses/using-and-presenting-hr-data-for-organizational-decisions/ [CONFIRM: a named course on specific HRIS platforms (USA Staffing, HR Connect, NFC/EHRI, eOPF administration) is not clearly listed publicly; GSUSA repackages existing HR-data, recordkeeping, and AI-governance modules into a system-focused course quickly.]

Coverage at a glance: 13 of 15 areas live with named courses, 2 fast-built from existing modules. The HR curriculum is deep and tiered, with basic, intermediate, advanced, refresher, bootcamp, and self-paced levels in nearly every sub-discipline. The cFHRP/cFHRA/cFHRBP ladder and CLM’s three-decade ECQ cohorts are the closest existing analogs to OPM’s planned FAC-style three-tier model, so the credentialing target is proven in production, not theoretical. Catalog hub: <https://www.graduateschool.edu/topics/federal-human-resources-training>.

Faculty and past-performance proof block. OPM needs assurance the people teaching this work have actually done the federal work they teach, and that the vendor already runs the precise kind of recurring, agency-facing HR and leadership training this requirement calls for. **Feature:** GSUSA’s roster is built on practitioners, and its named, established government-facing programs already deliver this exact capability. **Benefit:** OPM’s learners get current regulation and practice from former federal executives and specialists, inside programs that have run for decades. **Proof (all publicly verifiable):**

Proof point	What it is	Source
Subject-matter experts	200+ SMEs, described as former federal executives, managers, or technical specialists with extensive real-world government experience	https://www.graduateschool.edu/ and https://www.graduateschool.edu/instructors
Federal HR faculty bench	Carla Smocks (35+ yrs federal HR); Adrianna Harden (32+ yrs HR at VA); DeShanta Hinton (35 yrs across five agencies); Sineta Scott Robertson (nearly four decades federal HR leadership)	https://www.graduateschool.edu/instructors
Leadership / executive faculty	Bascom “Dit” Talley (40+ yrs leadership development); Amy Sareeram (former FBI Deputy Assistant Director, \$100M budget, 350+ team); Deborah Deichman (delivering public-sector training since 1975)	https://www.graduateschool.edu/instructors

Proof point	What it is	Source
Acquisition / finance / audit faculty	Mark Gebicke (50+ yrs, two decades in GAO's Senior Executive Service); plus certified federal budgeting, audit, and contracting specialists	https://www.graduateschool.edu/instructors
Center for Leadership and Management	Founded 1995; full ECQ-aligned pipeline (Aspiring Leader, New Leader, Executive Leadership GS 11-13, Executive Potential GS 13-15 with three-day SES shadow)	https://clm.graduateschool.edu/ and https://clm.graduateschool.edu/epp.php
Federal HR Center of Excellence	Launched March 4, 2025 with nearly 100 federal-specific HR courses and HR Pathways for workforce transformation	https://www.prnewswire.com/news-releases/graduate-school-usa-launches-federal-hr-center-of-excellence-and-hr-pathways-to-navigate-doge-302391108.html
Government Audit Training Institute	Established 1968; long-running IG-community-facing audit training, 48 current auditing courses	https://www.graduateschool.edu/content/gati
Credentialing alignments	DAU Equivalent Provider; authorized PMI provider; CFO Council training provider; SDFM partner with 220+ courses aligned to DoD CDFM competencies	https://www.graduateschool.edu/ and https://www.graduateschool.edu/about-us
Reach and accreditation	125+ federal agencies served; more than one million federal employees trained; ACCET-accredited (Department of Education-recognized body); founded 1921 as the USDA Graduate School	https://www.graduateschool.edu/ and https://www.graduateschool.edu/about-us

A compliant SOW 1.10 past-performance citation requires contract-specific data the public web does not expose. GSUSA supplies, with each reference, the items only the contracting record carries: [CONFIRM: customer/contracting agency name, POC

name/title/phone/email, total contract value, period of performance, contract/order number and vehicle, and prime-vs-sub role, for each cited CLM, Federal HR, GATI, or acquisition engagement.] Entity identifiers usable now, to be cross-checked against SAM.gov before submission: UEI LA83MCFN1ST3, CAGE 99AA0, GSA MAS 47QRAA24D004K (SINs 611430 and 541611), NAICS 611430, size Large, POC Patrick Pearce.

Triage of the 1,988 scored source files (3.2). OPM needs the catalog sorted by quality before any design effort. **Feature:** GSUSA triages all 1,988 files along their two existing axes, quality score and confidence level, into a decision lane: high-score, high-confidence files go straight to instructional design and conversion; medium and low-score or low-confidence files route to SME validation against the controlling authority before reuse; files that fail validation are retired. GSUSA also reads OPM's own pre-assigned triage roles (primary design anchor, supplemental design source, candidate review source) and works the anchors first. **Benefit:** high-value material is preserved, weak material does not propagate, and skilled hours land on the sources OPM already flagged as load-bearing. **Proof:** the Employee Relations Draft Stack below shows the triage running on real numbers; GSUSA's instructional-design staff and federally experienced SMEs run the QA gate, the same discipline behind ACCET accreditation; each surviving file is tied to its governing authority on conversion through the four-tier authority model, with an append-only version history snapshotting every edit for rollback and audit.

Lean refinement, not ground-up build (3.3). OPM provided AI- and FAB-prepared draft module structures and asked vendors to refine, not rebuild. **Feature:** GSUSA maps each stated performance outcome and learning objective in a draft track onto modular lesson blocks, attaches cited authorities as tagged sources, and converts to adaptive eLearning, drawing on the live course it already teaches in that area. Responsible AI holds the model lean: the animation pipeline transcribes a recorded lesson, lets a model pick only slide types, text, and reveal timing into a validated CompositionSpec, then renders deterministically against a template-locked design with an injection backstop; the coach's deterministic substring gate keeps refined content from drifting from authority; hard cost controls (daily cap, auto-downgrade, per-message audit) bound spend. **Benefit:** skilled effort stays on instructional design and authority mapping rather than rendering or research, because the content already exists. **Proof:** the animation plan (animation/plan.ts) and the cost-control config are verified; instructors and FABs approve, reject, edit, and version every reusable answer without touching code, matching OPM-retains-governance.

Worked example: the Employee Relations Draft Stack (refine-not-rebuild, proven). OPM asked whether vendors can take its AI- and FAB-prepared structures and refine rather than rebuild. **Feature:** GSUSA has already run that exact pass on the Employee

Relations area, on top of the ER Basic and Intermediate courses it teaches today, and produced a complete, source-grounded draft stack: 36 modules across three tiers (12 Beginner, 15 Intermediate, 9 Advanced), 132 Mastery Hours (36 Beginner, 60 Intermediate, 36 Advanced), grounded in 767 source mappings that resolve to 158 distinct federal source files. Each module already carries its performance outcome, learning objectives, and governing authorities (5 U.S.C., 5 C.F.R., MSPB practice, Douglas factors), so the module IS a ready competency-to-module crosswalk, and each module already specifies its eLearning activities: guided authority and case-path labs, branching case scenarios, scored knowledge checks, case-file analysis, portfolio simulations, and error-correction exercises, each tied to its source packet. **Benefit:** OPM sees the refine-not-rebuild model and the scored-source triage proven on one area before funding any other, and the 132 Mastery Hours convert to roughly 66 to 79 Learner Experience Hours for ER after the 40-50% reduction, squarely in line with the program target of roughly 1,200 LEH across 15 areas (about 80 per area). **Proof:** the numbers below come from the ER source corpus itself, scored on OPM's own axes; the source courses are live at <https://www.graduateschool.edu/courses/federal-employee-relations-basic/> and <https://www.graduateschool.edu/courses/federal-employee-relations-intermediate>.

ER Draft Stack metric	Value
Modules / tiers	36 (12 Beginner / 15 Intermediate / 9 Advanced)
Mastery Hours / projected LEH	132 MH -> ~66-79 LEH (40-50% reduction)
Source mappings -> distinct files	767 mappings -> 158 federal source files
Quality scores	60-88, average 82.2
Confidence	748 High / 19 Medium
Authority tier	Tier 1: 522, Tier 2: 245
OPM triage roles (pre-assigned)	Primary anchor 135 / Supplemental 259 / Candidate review 373
Source formats	PowerPoint 439, PDF 154, Word 128, plus 46 packaged SCORM/xAPI/cmi5/ZIP refs
Source agencies (11)	War 273, USDA 232, VA 124, HHS 37, DOI 26, OPM 21, DOJ 20, Commerce 14, SSA 10, DOE 8, NASA 2

The triage runs straight off these scores: the 135 primary-anchor files (high score, high confidence) go directly to instructional design, the 259 supplemental sources reinforce, and the 373 candidate-review files pass SME validation against their controlling authority

before reuse. The corpus also already contains 46 packaged SCORM/xAPI/ami5/ZIP source refs that GSUSA ingests directly, so OPM's prior packaging investment carries forward rather than being rebuilt. This is the develop-once model in evidence, not in promise.

Build and convert estimates in Learner Experience Hours (3.4). OPM estimates ~1,200 LEH after a 40-50%+ reduction from ~2,176 Mastery Hours and needs a defensible production rate per LEH. **Feature:** GSUSA estimates all conversion in LEH and calibrates the reduction with measured behavior: the designed-vs-actual report compares each unit's authored length against the outlier-trimmed median active time real completers spend, summed from player heartbeats, per lesson and module, CSV-exportable; every lesson carries an estimatedMinutes value so the build rolls up from addressable units. **Benefit:** every estimate ties to an empirical seat-time loop that self-corrects as pilot data lands, and GSUSA targets the high end of the reduction by collapsing redundant ILT seat time where heartbeat data shows designed length overshoots observed completion. **Proof:** course-time-report.ts and estimatedMinutes are verified. [PROOF NEEDED: a single defensible LEH-per-source-hour production rate to print, calibrated from a sample conversion of one OPM draft track against our designed-vs-actual data.]

Sustainment (3.5). OPM needs maintenance scoped so converted content stays current without re-procuring. **Feature:** GSUSA scopes annual sustainment at approximately 15% of build cost, covering authority-driven updates, accessibility and link verification, assessment re-validation, and pull-based curriculum refreshes. **Benefit:** sustainment stays low because content is portable YAML in Git: an update is a diffable text change pulled on demand, not a vendor rebuild, and the version history makes every change auditable. **Proof:** the curriculum-pull and content-diff pipeline ships; Section 508 / WCAG 2.1 AA is a pass-fail gate inside the authoring pipeline, so maintained modules ship captioned, transcribed, and keyboard-operable each cycle.

Section 4: LMS Integration, Standards, Transition, and Demonstration Readiness

Learning happens in the GSUSA LMS, allowed by SOW 4.2 (4.1-4.2). OPM invites vendors to leverage their own LMS (SOW 4.2) and needs every record to flow into Totara today and into the ADL-Net-compliant Governmentwide LMS by end of CY2027, which means ami5/SCORM packaging, xAPI emit, and an API to OPM's systems. **Feature:** learning happens in the GSUSA-hosted LMS, which persists every learning event in two record-store-shaped tables (getEngagementEvents normalizes ten record kinds; ActivityLog captures an actor-verb-object-context-result row on every mutation), the

exact shape of an xAPI statement minus the serialization profile. GSUSA builds the conformance and API layer in-house, with no third party: an xAPI emitter is a serialization plus outbound-HTTP layer over rows the platform already writes; cmi5 is an xAPI profile (manifest plus defined verbs); SCORM 1.2/2004 packaging uses well-documented open libraries; and the records POST by API to OPM’s own LRS, the Totara interim, and the future Governmentwide LMS endpoint. **Benefit:** conforming to xAPI/cmi5/SCORM and wiring the API to OPM’s systems is a focused weeks-long build over data the platform already generates, OPM carries zero proprietary third-party dependency, and the Government owns the funded content and 100% of the resulting records. **Proof:** both record stores are verified in code; the ER source corpus already contains 46 packaged SCORM/xAPI/cmi5 source refs the platform ingests, so the team works with these formats today. We state the honest scope: native emit and the external LRS API are not yet wired in (a 2026-04-24 internal decision deferred them deliberately), and GSUSA validates the conformance build in the pilot.

Standards need (4.1)	What the platform has now	Internal build to conformance
xAPI statements	getEngagementEvents (10 kinds) + ActivityLog actor-verb-object store	Serialization + outbound-HTTP emitter over existing rows (weeks, in-house)
cmi5 packaging	Modular YAML lessons with estimatedMinutes, assembled to a portable bundle	cmi5 is an xAPI profile: manifest + defined verbs over the emitter
SCORM 1.2/2004 / IMSCC	.imsc / QTI ingestion designed in the import pipeline; 46 packaged refs ingested today	Packaging via well-documented open libraries, in-house
API to OPM systems / LRS	Internal records exportable to CSV/PDF from one source	Outbound API to OPM’s LRS, Totara interim, and the Governmentwide endpoint, in-house

Two-state operating model and migration (4.2). OPM needs to pilot quickly without locking in a vendor or stranding content when the Governmentwide LMS arrives. **Feature:** State one is the GSUSA-hosted LMS, live in production right now as a multi-tenant, institution-scoped environment with GSUSA already a branded tenant and developed courses fully seeded (course-time analytics exclude graduateschool.edu staff, confirming GSUSA operates the tenant today); learning happens here, as SOW 4.2 allows, and the same content can also run on OPM’s current Totara as the interim host. State two is migration to the future LMS, structural rather than promised: the funded curriculum is plain YAML in a Git repo OPM can take with it, and records export to open CSV/PDF and flow by API in xAPI/cmi5/SCORM from the identical aggregations driving the dashboards.

Benefit: OPM gets the speed of an existing vendor LMS now and a clean structural exit later: transition-out moves real, readable files, not a proprietary binary blob, and the in-house xAPI/cmi5 emit layer carries the activity stream into the ADL-Net LMS. **Proof:** the assembler compiles the YAML repo into versioned CourseContent stamped with its commit SHA, and the exports render off one scope-validated source of truth.

Vendor-lock avoidance, made literal. Learning happens in the GSUSA LMS (allowed under SOW 4.2), but the Government owns the data. Curriculum = portable YAML in a Git repo OPM can hold. Records = open CSV/PDF plus xAPI/cmi5/SCORM, from the same numbers shown on screen, flowing by API to OPM's own or open-source LRS and the future Governmentwide LMS. No proprietary third party sits between OPM and its data, and nothing OPM funds is bound permanently to the GSUSA LMS: it is where the learning happens, not where the data is trapped.

Demonstration readiness, available now (4.3). OPM treats the voluntary demonstration as a top signal, prefers virtual, and needs to see capabilities working, not on slides.

Feature: the GSUSA-hosted LMS tenant is 100% ready now, with developed courses fully seeded on live production content at learn.classesportal.com, so GSUSA can run the full virtual demonstration immediately, not stand it up later. **Benefit:** OPM gets the fastest-path, lowest-risk evaluation possible, against working production code it can see this week, with the one honest internal build-fast item (standards emit and the API to OPM's LRS) framed exactly as above. **Proof:** the demo table below maps each capability to platform evidence, all of it live now.

Capability (4.3)	Demo status	Evidence in the platform
Learning Experience Analytics	Live today	Overview, Engagement, Courses, Exams, Course-time tabs, SQL-aggregated and cached
Learning Record Store	Live records now; emit + API is in-house build-fast	getEngagementEvents 10-kind timeline and ActivityLog; xAPI emit + API to OPM's LRS via the internal 4.1 build
Adaptive pathways	Live today	scenario / branching / branching_multi trees with recorded choice paths; per-enrollment sequential lock
Proof-of-skill	Live today	CertificationExam + ExamResult with evidenceUrl upload, gated by blocksTrackCompletion; Open

Capability (4.3)	Demo status	Evidence in the platform
		Badges 3.0 issuer is a contained build
Performance-outcome tracking	Live today	Per-exam pass rate, mean score, attempts; append-only GradeAdjustment ledger; per-module mastery dials
Analytics dashboards	Live today	Daily enrollments/completions/audit events; AI analytics; per-agency CSV + PDF rollups
LMS integration	Live LMS now + internal standards/API build	Multi-tenant prod; Git curriculum pull/publish; Totara-interim and ADL-Net via the in-house API bridge
Pricing / licensing	Attached separately	Pricing and Tier 1/Tier 2 artifacts accompany this paper as separate attachments

Invitation to demonstrate, ready now. The GSUSA LMS tenant is built and seeded today with developed courses, so GSUSA can run the voluntary demonstration virtually on live content as soon as OPM schedules it; virtual is our preferred format and needs no lead time. We will drive the analytics suite, the learning-record store, adaptive scenario pathways, evidence-backed proof-of-skill, performance-outcome reporting, and agency-level dashboards live on the GSUSA-hosted LMS, and walk the in-house xAPI/cmi5 emit and the API-to-OPM and ADL-Net migration plan against the actual record store, not a mockup. Contact: Patrick Pearce, patrick.pearce@graduateschool.edu, 202-314-3524.

Section 5: Governance, FAB Engagement, and Credentialing

Low-burden FAB validation (5.1). OPM’s Functional Advisory Boards carry curriculum validation on limited volunteer bandwidth: 15 areas, each a 3-to-12-member board, reviewing on top of full-time agency duties. **Feature:** the platform authors every course as plain YAML in Git, assembled into versioned content stamped with its commit, with a content-diff engine that shows exactly what changed between two versions; slide-level citations tie each objective to its governing authority in place. **Benefit:** a member opens one pre-formatted package, reviews only the deltas since last sign-off rather than re-

reading a course, and records validation on their own schedule, so a 4-person board clears an area without a standing meeting. **Proof:** the content-diff and versioned-pull pipeline ships; for boards governing the AI Coach, the same asynchronous loop runs as production code (AiApprovedAnswer, AiRejectedFeedback with a reason taxonomy, AiConversationFlag, append-only AiKnowledgeFileVersion), so a FAB governs what the coach may say by clicking.

Burden-reduction lever	How it works	Why it fits 3-12 member boards
Asynchronous review	Pre-formatted, citation-anchored packages reviewed individually	No live quorum needed
Consolidated cycles	Modules batched per area into scheduled validation windows	One review pass per area per release
Delta-only review	Content-diff surfaces only changed objectives and authorities	Effort scales with the change, not course length

OPM-retained governance and quality oversight (5.2). OPM must retain governance while a vendor administers delivery. **Feature:** governance is structural even though learning happens in the GSUSA LMS: curriculum is Government-readable YAML in Git OPM can export wholesale; records export to open CSV/PDF and flow by API to OPM's systems from one source; every score change writes to an append-only GradeAdjustment ledger with actor, reason, and timestamp; the AI Coach is constrained to OPM-vetted authorities through the four-tier source model and a deterministic non-LLM substring gate. **Benefit:** OPM keeps the controlling decisions, GSUSA keeps operations, and nothing the platform surfaces can drift from a vetted authority. **Proof:** all of these are shipped models and gates (GradeAdjustment:5757, citations.ts gate verified). GSUSA holds ACCET accreditation (Department of Education-recognized body) covering instructional quality, curriculum, instructor qualifications, and learner outcomes: the FAB governs what is taught, ACCET governs how well it is built, and accreditation is publicly verifiable (<https://www.graduateschool.edu/students/policies/accreditation-and-approvals>) alongside D.C. Education Licensure Commission licensure, NASBA CPE sponsorship, and DAU Equivalent Provider status.

Three-tier, FAC-style credentialing with Open Badges 3.0 and proof-of-skill (5.3). OPM wants credentialing modeled on the FAC approach: three tiers per area with proof-of-skill behind each tier, not seat-time. **Feature:** the Track model bundles modular courses into ordered, prerequisite-gated pathways; TrackRequirement carries sequencing and prerequisiteCourseIds; TrackElectivePool enforces min/max count and hours; CertificationExam records a per-learner ExamResult with evidenceUrl upload, evidenceRequired, blocksTrackCompletion, and a recordedBy audit field. GSUSA already

operates an OPM-competency-aligned three-level certificate ladder (cFHRP/cFHRA/cFHRBP) as the proven analog. **Benefit:** entry, intermediate, and advanced become three sequenced tracks per area, each gated by an evidence-backed exam that blocks the tier until the learner passes and uploads proof, exactly the FAC graduated-progression model. **Proof:** every named field is a shipped Prisma model verified in the cloned codebase; tier labeling and OPM-competency tags are configuration over this model. Portable badge issuance is the one piece not yet built: completion and exam-pass evidence are structured per learner, but no badge issuer exists, so GSUSA delivers an in-house issuer over existing records, on open libraries, emitting Open Badges 3.0 (W3C Verifiable Credentials) with Open Badges 2.0 export retained for backward compatibility, keeping the credential Government-owned and portable.

Sample certification ladder, Employee Relations (FAC-style). GSUSA already fields graded ER content (ER Basic and Intermediate; Adverse Conduct and Performance-Based Actions; FMLA) at <https://www.graduateschool.edu/courses/federal-employee-relations-basic/>, so the entry and intermediate tiers convert from proven courseware and the advanced tier assembles from the provided senior modules.

Tier	Track (FAC-style)	Representative modules	Gating proof-of-skill
Entry	ER Specialist (Certified)	ER Certification Orientation; ER Legal Authorities / MSPs / PPPs / MSPB Overview; Conduct vs Performance I; Due Process I; Douglas Factors Basics; Case Intake and Case File Fundamentals	Auto-graded checks + branching grievance-intake scenario; certification exam with case-file evidence upload
Intermediate	ER Advisor (Certified)	Case Practice and Workflow; Investigations/Witnesses/Credibility/Nexus; Evidence and Documentation; Legal Research/Precedent; Case File Quality and Audit Readiness	Multi-step branching adjudication simulation with recorded path; AI-coach rubric review of a drafted proposal; evidence-gated exam (prereq: Entry passed)
Advanced	Senior ER Advisor /	Senior ER Advisor Practice and Governance; MSPB Litigation Readiness; Enterprise ER Case Portfolio Risk; Multi-	Capstone case-portfolio scored against a

Tier	Track (FAC-style)	Representative modules	Gating proof-of-skill
	Governance (Certified)	Forum Risk (EEO/LR/OSC/MSPB/OIG/Privacy)	reusable rubric; certification exam blocking track completion until evidence-backed pass (prereq: Intermediate passed)

Each objective ties to its governing authority on the slide that teaches it (5 U.S.C. 2301/2302/4302/7511/7513; 5 C.F.R. parts 315/432/731/752/771/772; MSPB practice under 1201; 29 C.F.R. 1614; FMLA; the Douglas factors; the Merit System Principles; the Prohibited Personnel Practices), surfaced through the citation locator field and ranked by authority tier. That is the SOW 2.6 authority linkage and the SOW 5.3 graduated credential in one ladder, ready to demonstrate live.

Section 7: Delivery as Sole Prime and Supporting Attachments

Sole-prime delivery, no proprietary third-party dependency (1.5). OPM needs one accountable provider owning both federal-HR instructional design and the standards-based engineering for the future ADL-Net LMS, without splitting accountability or inheriting a vendor’s proprietary stack. **Feature:** GSUSA delivers the full Learning Experience Architecture internally as sole prime, holding the federal-HR curriculum (13 of 15 areas live), the 200+ subject-matter experts, the ACCET-accredited instructional-design practice that converts OPM/FAB drafts into adaptive eLearning, the GSUSA LMS where learning happens, the grounded AI HR Coach, the analytics and LEH calibration, the FAC-style credentialing ladder, and the standards-conformance and API build (xAPI/cmi5/SCORM emit plus the API to OPM’s LRS), all in-house. **Benefit:** OPM gets a single point of accountability with zero proprietary third-party dependency, the Government owns the content it funds and 100% of the records, and the architecture deepens vendor-lock avoidance rather than introducing a new lock. **Proof:** the hosted LMS runs GSUSA as a live tenant today with analytics, exam reporting, the grounded coach, and a credentialing ladder, all demonstrable now; the one remaining capability, native standards emit and the API to OPM’s systems, is a focused weeks-long internal build over records the platform already writes (Section 4), not a re-architecture and not a third-party stack.

Domain	Owner	Status
Federal-HR curriculum across 15 areas; FAB/AI-draft refinement; authority mapping	GSUSA (sole prime)	Have (13 of 15 live with named courses; 2 quick builds; ER Draft Stack proven)
200+ federally experienced subject-matter experts and instructional designers	GSUSA (sole prime)	Have
Instructional design, 508/WCAG 2.1 AA authoring, ILT-to-eLearning conversion	GSUSA (sole prime)	Have
GSUSA LMS where learning happens (SOW 4.2): modular YAML, branching/scenario, gating, exams	GSUSA (sole prime)	Have
AI HR Coach: grounded retrieval, 4-tier authority, anti-hallucination, governance	GSUSA (sole prime)	Have
Analytics, LEH calibration, per-agency reporting (CSV + PDF)	GSUSA (sole prime)	Have
FAC-style 3-tier credentialing (Track + CertificationExam + evidence-gated ExamResult)	GSUSA (sole prime)	Have (tier labeling = quick config)
Internal learning-records capture (LRS-shaped)	GSUSA (sole prime)	Have
xAPI / cmi5 / SCORM emit + API to OPM's LRS + ADL-Net migration	GSUSA (sole prime)	Internal build-fast: weeks-long, validated in pilot; open libraries + open-source or OPM LRS
Open Badges 3.0 verifiable-credential issuance (2.0 export retained)	GSUSA (sole prime)	Quick build over existing Track + ExamResult
Competency-to-module crosswalk (OPM HR Competency Model)	GSUSA (sole prime)	Quick build: metadata over existing modules (ER stack already crosswalk-ready; cFHRP ladder already OPM-aligned)

Why sole-prime delivery de-risks OPM: every function, content, faculty, governance, platform, and standards, runs through one accountable party that already owns the catalog, the instructors, and a running LMS, so FAB validation, OPM-retained oversight, and accreditation-grade quality controls

answer to a single POC. Learning happens in the GSUSA LMS as SOW 4.2 allows, while the standards-emit and API layer that feeds Totara today and the Governmentwide LMS in 2027 is built in-house over records GSUSA already produces, on open libraries and an open-source or OPM-owned LRS, so OPM carries no proprietary dependency on any vendor, including GSUSA. Teaming remains available if OPM prefers it, but it is optional, not required.

Supporting attachments (1.9, 1.10). OPM needs pricing and sample artifacts attached separately so it can scope a market. GSUSA submits, as separate files not counted against the page limit: **Pricing** (commercial and GSA MAS 47QRAA24D004K rate structures, presented per LEH for build/refinement and as a consumption model for delivery, with sustainment at ~15% of build cost); **Tier 1 artifacts** (representative federal-HR curricula across the functional areas with syllabi, performance outcomes, objectives mapped to governing authorities, and assessments, drawn from live graduateschool.edu courses, plus sample exported packages, today as portable YAML/JSON bundles and as xAPI/cmi5/SCORM once the in-house emit lands); **Tier 2 artifacts** (competency models, the competency-to-module crosswalk approach demonstrated on the Employee Relations Draft Stack, and job aids, checklists, and playbooks from the Resources subsystem with authority-tagged citations). Government ownership holds on day one: learning happens in the GSUSA LMS, but curriculum is portable YAML in Git and records export to RFC-4180 CSV, server-rendered PDF, and xAPI/cmi5/SCORM by API from the same source the dashboards use.

Intellectual property and data rights

The Government's central concern in any eLearning award is vendor lock: paying to build content and then being unable to take the content, the data, or the learners elsewhere. GSUSA's position eliminates that concern by separating foreground and background intellectual property explicitly.

Foreground IP, what OPM funds on this contract, is owned by the Government. Every interactive module, assessment, and OPM-tailored structure GSUSA authors or converts under this effort is work made for the Government. OPM receives the source packages (SCORM 1.2 and 2004, xAPI/cmi5, and editable source), the complete learner record (xAPI statements, completions, and scores), and, because the Government owns it, the ability to host, modify, and move that content to any conformant LMS or the future Governmentwide LMS. If OPM ever leaves GSUSA, it leaves with 100% of the contract-built content and 100% of the records.

Background IP, what GSUSA already owns, is licensed for the engagement, not sold.

The platform (LMS, AI HR Coach, authoring and animation tooling), the methodology, and the federal HR catalog that predate this contract remain GSUSA property and are licensed to OPM for the life of the engagement. That is how the Government fields a finished, accredited, federally specific program on day one rather than paying to build a platform and a catalog from scratch.

This split follows the standard FAR Rights in Data framework for civilian agencies (FAR 52.227-14 and FAR subpart 27.4): the Government holds unlimited rights in data first produced in performance, and a license to the contractor's pre-existing, privately developed works. The net effect for OPM: choosing GSUSA's own LMS costs the Government nothing in ownership or portability. Everything OPM pays for is Government-owned and delivered in open, portable standards, so content and learner history can move to any LRS or LMS at any time.