

Mr. Nilo Thomas Director, Operational Test and Evaluation (DOT&E)

UNCLASSIFIED

DoD Instruction (DoDI) 5000.98, Section 3.3: OT&E

According to the overarching DoDI 5000.98, Operational Test Agencies (OTAs) will conduct OT&E of artificial intelligence enabled DoD systems in accordance with DoDM 5000.101.



Goal: Improve test planning, test rigor, and implementation of leading practices for identifying and quantifying risks of Al-enabled systems, and characterizing system performance across the acquisition lifecycle.



Context: Beginning to test oversight systems with AI/ML and experimental autonomous capabilities. It will take time to reach authoritative best practices, T&E activities, and guidance.



PREVIOUS POLICY AND GUIDANCE

DOT&E is developing guidance to convey new expectations to PMs and the Services.

Unlike other DoDMs, DOT&E has not previously provided policy or guidance on Al. The DoDM includes directed and implied test activities; the guidebook will make expected test activities more explicit, with timelines for application.

DoDI 5000.101 AI&A Overview



What is New, Updated, or Re-Emphasized in DoDM 5000.101?

This slide highlights the major shifts within the DoDM, relating to planning, content or documentation, and deliverables.

PLANNING

- Science and Technology-Based Al testing
- Supports V&V of AI datasets and models
- T&E of AI model behavior
- Human-system integration and human machine teaming
- Adversarial and counter AI testing
- Five DoD AI Ethical Principles
- Resourcing considerations for Al

CONTENT / DOCUMENTATION

- Datasets and metadata used to train and test AI models
- Sustainability and data pipeline update plans
- Tracking of system safety and unexpected behavior
- Ensuring access to system safety assurance, software and hardware assurance, and mission performance assurance documentation

DELIVERABLES

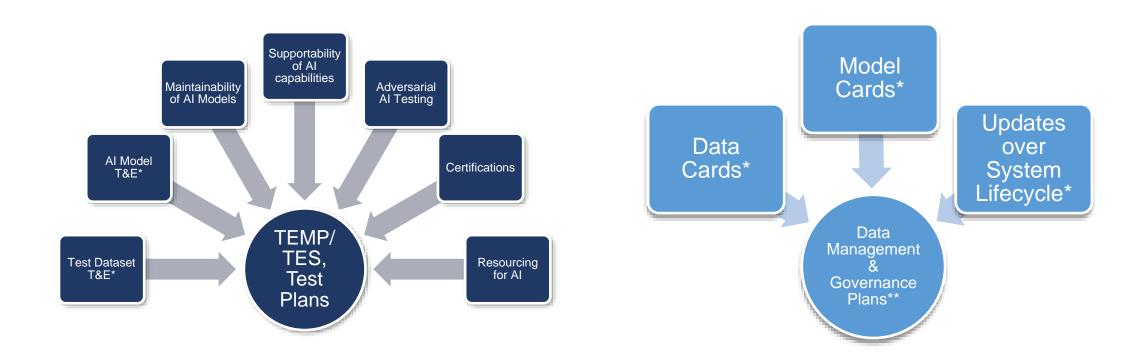
- Data management and governance plans
- Data cards
- Model cards





What Will the T&E Community Need to Do Differently?

The introduction of AI capabilities influences the scope, scale, and types of testing needed.



^{*}Test activities may be executed as part of contractor, developmental, and/or integrated testing. Relevant information should be documented and shared for operational test planning, execution, and reporting.

^{**}Data management plans are required by DoDI 5000.98.

Risks this DoDM Addresses

Changes are not necessarily one-size-fits-all programs, and DOT&E understands that guidance will need to be tailored. We plan to work at the program-level to understand what works, what does not work, and to revise guidance appropriately.

Concerns and Risks

- Based on how programs currently write about Al&A capabilities in TEMPs, TESs, and test plans, it can be unclear if and how novel Al&A risks are being identified, characterized, and accounted for
- Datasets and ML algorithms used to build Al&A capabilities have direct impacts on system performance, risks, and test needs
- Leading practices for HSI, cyber survivability and attack surfaces (e.g., adversarial and counter AI), and responsible AI methods for AI&A are rapidly changing

Expectations with a Signed AI&A DoDM

- As program test documents are developed and revised, programs should provide additional AI&A details
 - Al and autonomous capabilities should be adequately described in system descriptions, CONOPS, and include new operational users and maintainers (e.g., data scientists, ML engineers)
 - Shared documentation on datasets ("data cards") and AI models ("model cards") will assist planning, scoping, and executing AI&A lifecycle testing
 - DOT&E will work with T&E stakeholders to disseminate leading practices for T&E of AI&A

Risks this DoDM Addresses

AI&A System Test and Risk Considerations

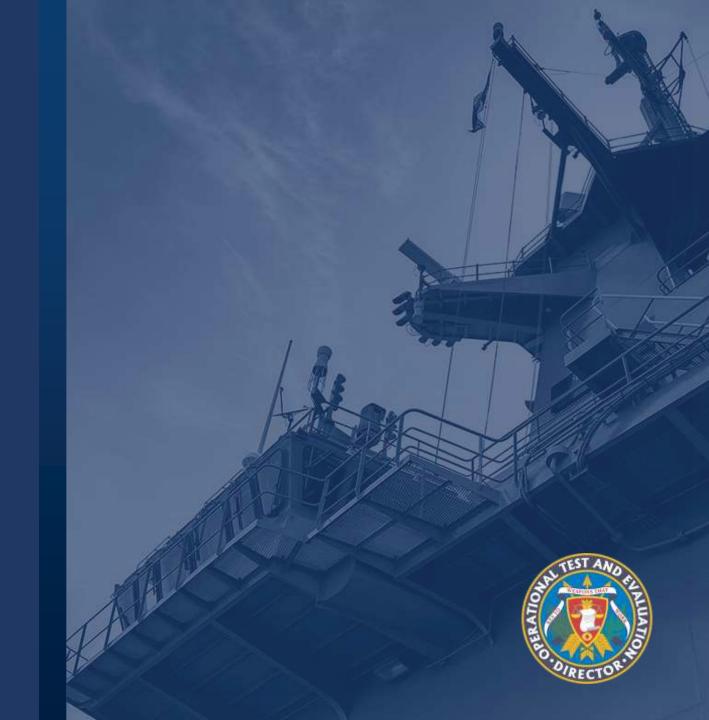
- Training datasets impact performance and should be validated for their system's use cases; government testers have equities into a test dataset's* splits and use
- Al model testing processes need to adapt based on frequency of retraining and other updates
- Users/operators must be able to work with more complex, potentially non-transparent systems, impacting HSI considerations
- Ensure continued, robust Al-enabled performance with updates and new missions
- DEPSECDEF declared that all DoD AI must meet
 5 AI Ethical Principles

New Responsibilities and Topics of Interest

- WIPT/ITT should account for new AI&A risks and test needs
- Data management plans account for Al considerations
- Risk management needs to account for changing AI/ML models in systems

^{* &}quot;Test dataset" refers to data put through AI models to assess and characterize model performance; it's distinct from test data collected during test activities

DoDM 5000.101Contents



Evaluation of Datasets: Verification and Validation for Use

Testing (and Training) Datasets

- Al/ML testing datasets are distinct from "test data" collected at test events
- Al/ML testing datasets are data pushed through models to assess performance
- Datasets should have:
 - Representativeness: datasets should represent data the system is expected to see in field
 - Independence: the government's testing datasets should be independent of vendor training data
 - Coverage: datasets should cover the full operational space for operational relevance
 - Multiple metrics are available
 - · Prioritize areas of less coverage for testing

New Responsibilities and Topics of Interest

- Created by AI/ML developers and updated over the system's lifecycle
- Data cards detail provenance, coverage, and other relevant details
- Datasets should update over time; details of data cards should update with them
- <u>Risk</u>: data used for training bring new supply chain and safety vulnerabilities that are unaddressed
- <u>Risk</u>: data used for training is not operationally relevant, look "good enough" during OT, and prove ineffective and/or fail upon fielding

Evaluation of AI/ML Models

AI/ML Models

- Al/ML models will go through test, evaluation, verification, and validation at the component-level (likely CT, DT)
- Ensure relevance of component tests to operational testing is known
- Characterize model performance, biases, robustness, scalability, and security, among other aspects¹
- Increased emphasis for mission-based metrics that can be tied to planned OT
- <u>Risk</u>: model performance and effectiveness issues pushed to live or other, more expensive testing
- Risk: testing does not capture edge cases, failure modes; first see in fielded systems

Model Cards (New Documentation)

- Should be developed early and updated over time
- Detail provenance (e.g., adapted from public model), testing, and performance
- Detail planned and actual model updates over time
- CDAO and TRMC have prototypes that they are iterating into standards with other stakeholders
- Risk: Al/ML models bring new supply chain and safety vulnerabilities that are unaddressed

¹ Details of testing AI models are beyond the scope of this presentation

Evaluation of Human Interaction With AI&A Systems

Various stakeholders have differing evaluation needs for AI&A system performance: Testers, commanders, programs, and operators/end users may have different needs.

- Interpretability: users need some level of understanding how AI&A functions to trust it
- Explainability: users may need clear and valid explanations of AI/ML decisions made
- Assess whether user's trust is appropriately calibrated across the operational envelope (not over- or undertrusting)
- Test events may need demonstrations of identifying problematic performance and executing mitigations, e.g., model changes

- All systems need to be **governed** adequately to retain responsible positive control: demonstrate users detecting when and how to roll back systems to prior, more stable versions (under problematic performance)
- Risk: operators do not have information to govern systems and prevent unintended engagements
- Risk: commanders do not have enough assurances to allow Al&A on ranges and employ in operations

Evaluation of Learning Systems That Change Over Time

AI/ML Models Inherently Change

- When frequent Al updates are planned, OT may evaluate the adequacy of ML model maintainability and supportability
- Verify processes are in place to detect, track, and respond to deviations in performance
- Assess adequacy of retesting plans upon AI/ML model redeployment

DoDD 3000.09¹

- DOT&E is responsible for:
 - Establishing standards for data collection postfielding for monitoring and assessment by programs
 - Coordinating with PMs and appropriate military commanders to identify when additional T&E is required to prevent unintended engagements or resist adversary interference
 - Primarily will occur due to system design or operational environment changes (e.g., System to operate in CENTCOM and will be employed in INDOPACOM)

¹ Department of Defense. "Autonomy in Weapon Systems." DoD Directive (DoDD) 3000.09. Washington, DC: OUSDP, 25 January 2023.

Other Practices in the DoDM

Multiple New Responsibilities and Topics of Interest

- WIPT/ITT has new responsibilities relating to AI&A risks and test needs
- Data management plans account for Al considerations
- Risk management needs to account for changing AI/ML models in systems

CDAO AI T&E Frameworks Include Additional Guidance On Implementation

DTE&A



- Al model testing
- System integration testing
- Human-systems integration testing
- Operational testing

DOT&E Responsibilities

Reflections – What Does This Mean for DOT&E AO Program Oversight?

Reviewing TEMPs/Test Plans once this guidance is issued

- Identifying User and operator HIS, HMT, and trust considerations
- Ensure continued, robust Al-enabled performance with updates and new missions
- Ensuring DoD AI systems are meeting the 5 AI Ethical Principles
- Al models change over time and the test process must adapt to the changes in the model over time
- Data Management Plans to include Al&A considerations
 - Understanding Test and Training datasets and how AI&A programs use them
 - Having access to the AI model and data cards to determine adequate AI scoping
- Aware of advanced threats to Al&A systems due to adversarial Al techniques



CLOSING STATEMENTS Q/A



THANK YOU