GSA Order: GSA Open Source Software (OSS) Policy

CIO 2107.1A
GSA IT
cto@gsa.gov

Purpose:

The purpose of this Order is to update GSA's policy on open source software development and publication, reinforce GSA's commitment to a transparent, open-first approach to software development, provide clear guidance to our industry partners on the government's expectations for open source strategy, handling of code, responsibilities and practices, and to outline the agency's responsibility for complying with OMB's open source policy.

This policy aims to:

1. Enhance efficiency – Maximize the value of government's technology investment;

2. Promote sharing – Make it easier to collaborate, share standards, and promote best practices;

3. Increase competition – Encourage vendor diversity by providing open access to projects, data, code and playbooks, making it easier for a broader community of providers, including small, specialized vendors to participate;

4. Increase transparency – Allow other government agencies and governments to leverage, extend, and share improvements to code as they meet their own similar needs and allow the American public to more easily understand and participate in government; and

5. Enhance security – When combined with secure code practices such as NIST SP 800-218 Secure Software Development Framework, improve the security and resilience of our technology while reducing the risks associated with closed systems, data, and processes.

Background:

Beginning with our initial open source strategy in 2015 and subsequently with the issuance of our first Open Source Policy in 2016, the Office of GSA IT takes an open-first approach to data, application programming interfaces, artificial intelligence,

and source code. At approximately the same time, OMB published OMB Memorandum M-16-21. The release of this memorandum prioritized the creation of an agency-wide process of releasing open source code. As GSA continues to lead with forward-thinking technology processes, the agency will provide high levels of support for open source development from GSA IT infrastructure and development tools.

Applicability:

1. This Order applies to all GSA Services, Staff Offices, and Regional components.

2. This Order applies to the Office of Inspector General (OIG) only to the extent that the OIG determines it is consistent with the OIG's independent authority under the IG Act and it does not conflict with other OIG policies or the OIG mission.

3. This Order applies to the Civilian Board of Contract Appeals (CBCA) only to the extent that the CBCA determines it is consistent with the CBCA's independent authority under the Contract Disputes Act and other authorities and it does not conflict with the CBCA's policies or the CBCA mission.

Cancellation:

This Order supersedes CIO 2107.1, GSA Open Source Software (OSS) Policy, dated January 14, 2019.

Summary of Changes:

1. Updated document to conform with OAS 1832.1C.

2. Simplifies the policy to focus on GSA's open-first posture.

3. Updates the policy to align with current federal open source requirements and simplify compliance.

Roles and Responsibilities:

1. GSA's Chief Technology Officer (CTO) is responsible for establishing implementation guidance and publishing on https://open.gsa.gov.

2. GSA Service and Staff Offices (Project teams) are responsible for using a suitable version control system with appropriate configuration and security tooling for secure development, and ensuring that it supports the application's level of strategic importance in terms of integrity, confidentiality, and availability.

3. GSA Service and Staff Offices (Project teams) are responsible for being "open first" by requiring new custom code to be developed in the open in publically-readable repositories. Sufficient justification will be required for new

custom code that does not follow these guidelines. For guidance, see https://open.gsa.gov.

Signature

/S/_____   1/22/2026____
David Shive   Date
Chief Information Officer
Office of GSA IT

1. Policy

This Order requires GSA organizations to account for and publish their open source code in accordance with M-16-21 and:

1.1. Promotes a posture of being "open first" by requiring new custom code, including code developed by GSA personnel and contractors, to be developed in the open in publically-readable repositories wherever possible. Justification will be required for new custom code not made publicly available, (e.g. - code with system specific CUI), in which cases effort should be made to modularize/decouple code to allow making as much as possible publically-readable and minimizing the amount of non-public code. Guidance on releasing open source code can be found at https://open.gsa.gov;

1.2. Instructs programs to evaluate the feasibility and safety of transitioning existing closed-source code to open-source projects and, when appropriate, to make source code available to other agencies and the public;

1.3. Requires that GSA IT infrastructure, including CI/CD pipelines, cloud platforms, and version control systems, support open-source repositories;

1.4. Incorporates GSA's Open Source Implementation guidelines and Open Source Checklist to ensure the proper considerations are made before going live with a public software project;

1.5. Requires that a baseline set of secure open source code practices is in place on https://open.gsa.gov that all organizations will follow. This process shall include practices such as performing automated code scanning, code reviews, avoiding secrets in source code repositories, and using protected branches. The Office of the CTO will maintain, review, and refine the baseline practices to reflect current secure open source software development practices tailored to the needs and constraints of the agency;

1.6. Implements OMB's three-step software analysis outlined in M-16-21. Specific contract requirements have been developed through collaboration between GSA's Senior Procurement Executive and the Open Source Working Group and published in the GSAM 511.170 (g);

1.7. Requires that wherever possible all internally-developed code related to artificial intelligence shall be shared for internal consumption as well as open sourced in public repositories per CIO 2185.1B Accelerating Responsible Use of Artificial Intelligence at GSA.