



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

Memorandum

To: Heads of Bureaus and Offices
U.S. Department of the Interior Software Development Community

From: Paul A. McInerny, Chief Information Officer
Office of the Chief Information Officer

Megan Olsen, Senior Procurement Executive
Director, Office of Acquisition and Property Management

Subject: 2025 Open-Source Software Policy

I. Purpose

This memorandum revises the U.S. Department of the Interior's (Department, Interior) policy on sharing custom developed source code and defines implementation responsibilities for the Source code Harmonization And Reuse in Information Technology Act (SHARE IT Act)¹. The Department promotes sharing custom-developed code to the greatest extent permitted by law to improve efficiency through reuse as intended by the SHARE IT Act.

II. Recissions

This policy rescinds and replaces the [OCIO Open Source Policy memo signed November 8, 2021](#).

III. Definitions

The following definitions from the SHARE IT Act apply.

- 1) "Source code" means a collection of computer commands written in a computer programming language that a computer can execute as a piece of software.
- 2) "Custom-developed code" means source code that is "(i) produced in the performance of a contract with an agency or is otherwise exclusively funded by the Federal Government; or (ii) developed by a federal employee as part of the official duties of the employee."
- 3) "Repository" means "a software storage location... that contains source code, documentation, configuration scripts, as appropriate, revision history, and other files..."
- 4) "Metadata" means "structural or descriptive information about data..." and includes "(i) information on whether the custom-developed code was (I) produced pursuant to a contract; or (II) shared in a public or private repository; (ii) any contract number under which the custom-developed code was produced; and (iii) any hyperlink to the repository in such the code was shared."

For clarity, we add the following definitions.

- 5) "Other key technical components" means information essential to developing and operating custom-developed code. Per the SHARE IT Act this includes "documentation, data models, schemas, metadata, architecture designs, configuration scripts, and artifacts required to develop, build, test, and deploy the software".

¹ [Public Law 118-187](#)

- 6) “Version control system” (VCS) means a service that provides read-and-write access to repositories. Examples include GitHub, GitLab, BitBucket, AWS CodeCommit, Google Cloud Source Repositories, Azure DevOps Repos, SVN, and CVS.
- 7) “Office of the Chief Information Officer (OCIO)-approved version control system” (OAVCS) means a version control system that is officially approved by Interior’s OCIO.
- 8) “Custom-code developer” means anyone or anything (including AI agents) that creates or modifies custom-developed code.
- 9) “Department Single Environment” means the interconnected system, as defined in [the Department’s Hosting Services Policy](#), that provides connections “between Department resources and the commercial cloud environment, cybersecurity controls, and continuous monitoring capabilities for all Interior consumers hosted within the environment.”
- 10) “Software License” means the legal agreement that defines rights users may have for using, accessing and modifying the software.
- 11) “Open-Source Software” (OSS) means software for which the human-readable source code is available for use, study, re-use, modification, enhancement, and re-distribution by the users of such software. It may be dedicated to the public domain or may be distributed under software licenses that comply with the definition of "Open Source" provided by the Open Source Initiative (<https://opensource.org/osd>) and/or that meet the definition of "Free Software" provided by the Free Software Foundation (<https://www.gnu.org/philosophy/free-sw.en.html>).

IV. Scope

This policy applies to all custom-developed code and key technical components that are developed or revised (1) by a Department of the Interior federal employee after the policy’s effective date, or (2) under a Department contract awarded pursuant to a solicitation after the policy’s effective date. This policy only applies to custom-developed code and key technical components that were created before this policy’s effective date if they are modified after the policy’s effective date.

This policy does not apply to source code that is solely exploratory or disposable in nature, including source code written by a developer experimenting with a new language or library. This policy does not apply to commercial off-the-shelf software or configuration scripts for such software.

V. Policy

- 1) This policy establishes the requirement to:
 - a) Manage all custom-developed code and other key technical components in a repository in an OCIO-approved version control system (OAVCS).
 - b) At a minimum, make repositories discoverable by and accessible to all federal employees.
 - c) Release custom-developed code and other key technical components in accordance with the following:
 - i) For custom-developed code and other key technical components that are original and developed solely by Department of the Interior federal employees, release code under the license defined in Attachment A.
 - ii) For custom-developed code and other key technical components developed and delivered by a third party under a contract or other agreement with the Department, ensure that the terms of the contract or other agreement secure at least unlimited rights under the Federal Acquisition Regulations (FAR) Part 27 (e.g., unlimited rights under FAR 52.227-14) or otherwise sufficient rights for the Department to release the third-party code and components in accordance with the SHARE IT Act and this Policy. The OCIO, the Office of Property and Acquisition Management, and the Office of the Solicitor will commit to working together to create and share guidance on common contract terms and licensing scenarios.
 - iii) Where custom-developed code and other key technical components developed solely by Department of the Interior federal employees are based on pre-existing code and/or

components, release in accordance with the license terms and conditions of the pre-existing code. The OCIO and the Office of the Solicitor will commit to working together to create and share guidance on common licensing scenarios.

- iv) Where custom-developed code and other key technical components are developed using an AI agent, the OCIO and the Office of the Solicitor will commit to working together to create and share guidance on common licensing scenarios.
- 2) To achieve additional efficiency and transparency, Interior recommends managing custom-developed code and other key technical components in a repository that is freely accessible to members of the public over the internet.

VI. Exemptions

Custom code developers do not have the authority to exempt their repositories from any requirement of this policy. Only the OCIO's exemption process may exempt a repository from sharing.

VII. Effective Date

This policy is effective upon the date of signature.

VIII. Roles, Responsibilities

- 1) Office of the Chief Information Officer (OCIO)
 - a) Establish the following, working with the software development community
 - i) A SHARE IT Act metadata profile
 - ii) Standards to become an OCIO-approved version control system (OAVCS)
 - iii) Procedures to determine whether a repository can be exempted from sharing under section 4(b) of the SHARE IT Act
 - iv) Procedures for making metadata for code publicly accessible
 - b) Publish implementation guidance, procedures and standards.
 - c) Ensure that all Department of the Interior federal employees and contractors have access to at least one OAVCS.
 - d) Maintain an inventory of all version control systems that manage Department of the Interior custom-developed code.
 - e) Implement and manage processes for acquiring metadata and standards compliance evidence from all OAVCSs.
 - f) Regularly review OAVCSs to assess OAVCS standards compliance, and work with system owners to take action necessary to comply.
 - g) Publicly post SHARE IT Act metadata on Interior's custom-developed code.
 - h) Submit to the Federal CIO by December 31 of each year a report providing a brief narrative justification for each Department of the Interior repository exempted from government-wide reuse, including the exempting law or regulation.
 - i) Implement procedures for evaluating whether a repository can be exempted from sharing under section 4(b) of the SHARE IT Act.
 - j) Assign a Program Manager to maintain documentation and implementation records to support the Government Accountability Office's (GAO's) assessment of the SHARE IT Act's execution.
 - k) Provide technical subject matter expertise to the Office of the Solicitor to support their legal decision-making regarding software licensing.
- 2) Heads of Bureaus and Offices
 - a) Amend or rescind any bureau- or office-level policies that are inconsistent with the requirements of this policy.
- 3) Office of Acquisition and Property Management
 - a) Collaborate with the OCIO and the Office of the Solicitor to create and implement standardized reporting practices across the agency to capture key information relating to a contract under

which custom-developed source code was produced for reporting statistics about the contract, consistent with guidance from the Federal CIO.

- 4) Contracting Officers
 - a) Ensure contracts under which custom code is developed are drafted with sufficient language to comply with the SHARE IT Act.
- 5) Administrators of Version Control Systems (VCSs) and System Owners of Department Single Environments (e.g., AWS, Google, Azure)
 - a) Register the VCS in the OCIO's VCS inventory
 - b) Either:
 - i) Implement the OAVCS standards,
 - ii) Decommission the version control system,
 - iii) Or receive a written temporary exception from the OCIO to continue to operate another VCS
- 6) Custom code developers
 - a) Manage custom-developed code and other key technical components in a repository within an OAVCS.
 - b) Maintain correct metadata for repositories.
 - c) Establish and maintain an open-source software license for repositories, consistent with section V. 1) c) of this policy. Reference the DOI's legal guidance on common software licensing scenarios, and/or coordinate with the Office of the Solicitor.
 - d) If applicable, submit a request to exempt a repository from sharing to the OCIO.
- 7) Office of the Solicitor
 - a) Collaborate with the OCIO to provide legal guidance on common and on case-by-case software licensing scenarios.

IX. References

- 1) [Public Implementation Guidance](#)
- 2) [Internal Implementation Guidance](#)

X. Authorities

- 1) Pub. L. No. 118-187, [the Source code Harmonization And Reuse in Information Technology Act](#).

For questions related to this policy, please contact Department of the Interior Software Architect Carl Schroedl carl_schroedl@ios.doi.gov or share_it_act@ios.doi.gov.

cc: Office of the Solicitor, General Law
Office of the Chief Information Officer, Deputy CIO – Customer Service, Infrastructure, and Resource Management,
Office of the Chief Information Officer, Deputy CIO – Mission Systems, Technology, and Data

Attachment A: Department of the Interior Policy for Custom-Developed Code and Other Key Technical Components that are Original and Developed Solely by Department of the Interior Federal Employees

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