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Comments on the National Institute of Standards and Technology's Draft "U.S. Leadership in AI: A Plan for Federal Engagement in Developing AI Technical Standards and Related Tools"
June 19, 2019

Introduction

Workday appreciates the opportunity to provide comments in response to the National Institute of Standards and Technology's (NIST) recently released draft "*U.S. Leadership in AI: A Plan for Federal Engagement in Developing AI Technical Standards and Related Tools*" (draft plan).

Workday is a leading provider of enterprise cloud applications for finance and human resources. Founded in 2005, Workday delivers financial management, human capital management, planning, and analytics applications designed for the world's largest companies, educational institutions, and government agencies. Within its applications, Workday incorporates machine learning and artificial intelligence (AI) technologies that enable its customers to make more informed decisions and accelerate operations, as well as assist workers with data-driven predictions that lead to better outcomes.

Workday was pleased to submit information in response to NIST's May 1, 2019 request for information toward understanding the current challenges regarding the development of AI standards and tools as well as participate in NIST's May 30, 2019 workshop. With respect to the draft plan, we offer the following recommendation.

Addition of a Voluntary AI Framework

The draft plan correctly notes that "increasing the trust in AI technologies is a key element in accelerating their adoption for economic growth and future innovations that can benefit societies."[1] However, while AI-related standards focused on trustworthiness, societal and ethical considerations, and governance are in some form of development, the plan indicates that "the ability to understand and analyze the decisions of AI systems and measure their trustworthiness is limited."[2]

The draft plan includes recommended federal actions related to closing this and other gaps within four broad themes. Recommended Federal Government Standards Action #3 suggests expanding public-private partnerships in order to "develop and use AI standards and related tools to advance trustworthy AI" and specifically recommends NIST leading "non-traditional collaborative models for standards development" and fostering "collaborative environments to promote creative problem solving."[3] Workday would recommend NIST consider the feasibility of adding the following specific action to Action #3:

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[1] See *U.S. Leadership in AI: A Plan for Federal Engagement in Developing technical standards and Related Tools - Draft for Public Comment,* https://www.nist.gov/sites/default/files/documents/2019/07/02/plan_for_ai_standards_publicreview_2july2019.pdf (last visited July 16, 2019).
[2] See *id*.
[3] See *id*.

- Launch a collaborative process to develop an enterprise-level voluntary Framework consisting of standards, guidelines, and/or best practices to help organizations better assess, manage, promote, and communicate AI trustworthiness. *Suggested lead: NIST*

With expertise from the successful *Framework for Improving Critical Infrastructure Cybersecurity*, which has become the *de facto* standard for cybersecurity programs, and the on-going process to develop the *NIST Privacy Framework – An Enterprise Risk Management Tool*, the Institute has a "long track record of successfully and collaboratively working with the private sector and federal agencies to develop guidelines and standards."[4]   These processes are widely considered the gold standard for public-private cooperation on issues requiring creative thinking and the development of meaningful tools. The issue of AI trustworthiness appears ready-made for NIST's experience in developing useful voluntary Frameworks using an open, transparent, and collaborative approach.

Conclusion

Workday appreciates the opportunity to comment on NIST's draft plan. We hope NIST will build on its previous success and consider launching a collaborative Framework process related to trustworthy AI. We would welcome the opportunity to participate in such a process. Workday recently published *Workday's Commitment to Ethical AI*, which includes six key principles that guide how we responsibly develop machine learning and AI for the enterprise space, and we are certain additional stakeholders would provide experience with related efforts and practices. Please do not hesitate to reach out to Chandler C. Morse at chandler.morse@workday.com for further assistance.

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[4] See *NIST Privacy Framework Fact Sheet, September 2018*, https://www.nist.gov/sites/default/files/documents/2018/09/04/privacyframeworkfactsheet-sept2018.pdf (last visited July 16, 2019).