All comments will be made public as-is, with no edits information, otherwise sensitive or prote

**Comment Template for
Responses to NIST
Artifical Intelligence Risk
Management Framework**

General RFI Topics (Use as many lines as you like)	Response #	Responding organization	Responder's name	Paper Section (if applicable)
Please see item 10 below for suggested framework				
Responses to Specific Request for information (pages 11,12, 13 and 14 of the RFI)				

1. The greatest challenges in improving how AI actors manage AI-related risks – where "manage" means identify, assess, prioritize, respond to, or communicate those risks;			
2. How organizations currently define and manage characteristics of AI trustworthiness and whether there are important characteristics which should be considered in the Framework besides: accuracy, explainability and interpretability, reliability, privacy, robustness, safety, security (resilience), and mitigation of harmful bias, or harmful outcomes from misuse of the AI;			

3. How organizations currently define and manage principles of AI trustworthiness and whether there are important principles which should be considered in the Framework besides: transparency, fairness, and accountability;			
4. The extent to which AI risks are incorporated into different organizations' overarching enterprise risk management – including, but not limited to, the management of risks related to cybersecurity, privacy, and safety;			
5. Standards, frameworks, models, methodologies, tools, guidelines and best practices, and principles to identify, assess, prioritize, mitigate, or communicate AI risk and whether any currently meet the minimum attributes described above;			

6. How current regulatory or regulatory reporting requirements (e.g., local, state, national, international) relate to the use of AI standards, frameworks, models, methodologies, tools, guidelines and best practices, and principles;				
7. AI risk management standards, frameworks, models, methodologies, tools, guidelines and best practices, principles, and practices which NIST should consider to ensure that the AI RMF aligns with and supports other efforts;				

8. How organizations take into account benefits and issues related to inclusiveness in AI design, development, use and evaluation – and how AI design and development may be carried out in a way that reduces or manages the risk of potential negative impact on individuals, groups, and society.				
9. The appropriateness of the attributes NIST has developed for the AI Risk Management Framework. (See above, "AI RMF Development and Attributes");				

		1	JR3 Consulting, LLC	John Rice	
10. Effective ways to structure the Framework to achieve the desired goals, including, but not limited to, integrating AI risk management processes with organizational processes for developing products and services for better outcomes in terms of trustworthiness and management of AI risks. Respondents are asked to identify any current models which would be effective. These could include – but are not limited to – the NIST Cybersecurity Framework or Privacy Framework, which focus on outcomes, functions, categories and subcategories and also offer options for developing profiles reflecting current and desired approaches as well as tiers to describe degree of framework implementation; and					

11. How the Framework could be developed to advance the recruitment, hiring, development, and retention of a knowledgeable and skilled workforce necessary to perform AI-related functions within organizations.			
12. The extent to which the Framework should include governance issues, including but not limited to make up of design and development teams, monitoring and evaluation, and grievance and redress.			

or redactions. Please be careful to not include confidential business or personal ected information, or any information you do not wish to be posted.

Submit comments by August 19, 2021:

Response/Comment (Include rationale)	Suggested change

Suggestion for structuring the framework based on individual's novel risk management framework while supporting the Army, then NASA, and subsequently the DoD at large. Risk framework was topic of publication in DoD's Acquisition Research Journal, topic of invited presentation at the Defense Manufacturing Conference, and oft-reviewed and cited article at ResearchGate.net.	Recommend a cursory review of subject research for application to AI. It is provided as an email attachment with this template. Includes minor updates to the original 2010 publication. **Figure 4, in particular, is the subject of the paper and should summarize the topic.**