August 19, 2021

National Institute of Standards and Technology
100 Bureau Drive
Stop 2000
Gaithersburg, MD 20899

RE: The National Society of Professional Engineers Response to Docket ID No. NIST-2021-0004, *Artificial Intelligence Risk Management Framework*

On behalf of more than 23,000 members of the National Society of Professional Engineers, these comments are submitted in response to the National Institute of Standards and Technology's request for input on the "Artificial Intelligence Risk Management Framework."

The National Society of Professional Engineers is committed to creating a world where the public can be confident that engineering decisions affecting their lives are made by qualified and ethically accountable individuals. It is the policy of NSPE to support emerging technologies in a manner that protects the public through rigorous development, testing, and deployment of emerging technologies. The rationale for this position is rooted in a professional engineer's ethical obligation to hold paramount the public health, safety, and welfare.

With this role in mind, the National Society of Professional Engineers recommends NIST include, as part of its risk management framework for artificial intelligence, a licensed professional engineer or an individual qualified by education, examination, and experience through a reputable professional or industry organization. This individual would be responsible for making decisions related to protecting the public, including those who would use or potentially be affected by an AI application. Oversight responsibility should include having the authority to approve or reject the process, methodology, or other characteristics of the specific AI project. Having a credentialed individual to ensure these considerations are made can reduce risk that an artificial intelligence application will fail.
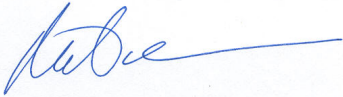
A professional engineer or properly credentialed individual would also be responsible for mitigating bias, making ethical considerations, and managing safety risks. By virtue of their extensive training, professional engineers and properly credentialed individuals are uniquely suited to fill such a role. To become licensed or credentialed, these individuals must meet education, experience, and

examination requirements. Additionally, in most cases, these individuals must complete a continuing education requirement (the number of hours varies by state) to maintain their license or credential. By fulfilling a continuing education requirement, they stay abreast of new developments in artificial intelligence and its applications, and can use that knowledge to inform their role within an artificial intelligence risk management framework.

A credentialed individual, who is accountable for the safety of the public, will prioritize safety over profit or a rush to innovation.

NSPE greatly appreciates this opportunity to comment on NIST's request for input on an artificial intelligence risk management framework. Any further questions can be directed to Margaret Edwards, policy associate, at medwards@nspe.org.

 Sincerely,

Rick Guerra, P.E., F.NSPE
NSPE President