American Hospital Association Response to NIST Artificial Intelligence Risk Management Framework RFI

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	Response #	Responding organization	Responder's name	Paper Section (if applicable)	Response/Comment (Include rationale)	Suggested change
General Comments	1	**American Hospital Association**	**Samantha Burch Director, Health IT Policy**		The American Hospital Association (AHA) appreciates that the National Institute of Standards and Technology (NIST) is soliciting public feedback to inform the development of a voluntary Artificial Intelligence (AI) Risk Management Framework. We support this effort to improve the trustworthiness of AI systems and the transparent, open and collaborative approach NIST is undertaking to engage a broad range of stakeholders. While the framework is intended to be industry-agnostic, we anticipate this guidance will be useful and relevant as use of AI in health care continues to grow and evolve.	
General Comments	2	**American Hospital Association**	**Samantha Burch Director, Health IT Policy**		We further appreciate that NIST extended the original deadline for comments, providing additional time for interested parties to review the Request for Information (RFI) and respond. Moving forward, we encourage NIST to provide comment periods of at least 45 days to ensure adequate time for stakeholders to offer thorough input critical to informing the framework. The AHA looks forward to continuing to engage in this process.	
Responses to Specific Request for information (pages 11,12, 13 and 14 of the RFI)						

| 9. The appropriateness of the attributes NIST has developed for the AI Risk Management Framework. (See above, "AI RMF Development and Attributes"); | 3 | American Hospital Association | Samantha Burch Director, Health IT Policy | | The RFI identifies a number of elements and attributes the framework is expected to include such as be consensus-driven, provide common definitions, use plain language, be applicable to different organizations, be risk based, outcome-focused, voluntary, non-prescriptive and adaptable to different organizations. The AHA believes these elements and attributes are appropriate and will increase the value of the framework for stakeholders. We further appreciate that NIST underscores that this guidance is intended to be a "living document," acknowledging that AI and its associated risks are dynamic in nature and will evolve over time. | |