



September 9, 2021

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

Re: NIST Artificial Intelligence Risk Management Framework RFI

Colleagues,

Thank you for this opportunity to comment on the AI-RMF. I offer a simple suggestion, with rather large granularity, namely, that NIST and its sibling institutes have a rare opportunity to formalize attention to applied ethics as a core component of the nation's AI mission.

There are countless good suggestions for guiding ethical and trustworthy AI; and no shortage of advice about how to achieve this. What seems to be wanted is a structure or process best conceived as analogous to that fledged in the early days of the Human Genome Project, namely, an explicit and sustained commitment to identify, study and resolve Ethical, Legal and Social Implications of an exciting new technology. Indeed, from transportation to law enforcement to medicine, more lives are and will be touched by AI than genetics... and the future of genetics itself will rely on both knowledge-based and machine-learning AI.

In many respects, the biomedical informatics and ethics communities have already done an exemplary job. Indeed, many of the challenges identified – often framed as “concerns” – have been studied by these communities for decades. What is wanted is likely not an ongoing itemization of concerns and challenges but, rather, an ELSI program/unit/working group to (i) identify new issues as well as best practices for addressing those already recognized; (ii) conduct empirical and conceptual research on all such challenges; (iii) and offer best-practice policy and education guidance across the board.

For instance, it has already been suggested that standards themselves both raise and resolve ethical issues.* How they can – and ought – do so is a fertile field for additional inquiry and analysis.

An ELSI program for NIST, perhaps in coordination or conjunction with the many other federal agencies grappling with Artificial Intelligence, establishes a structured and transparent resource to identify and manage risk and, moreover, help ensure that these technologies both warrant and enjoy public trust.

Sincerely,

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* Goodman KW. *Ethics, Medicine and Information Technology: Intelligent Machines and the Transformation of Health Care*. Cambridge: Cambridge University Press, 2016.