March 14, 2025

Faisal D'Souza
Networking and Information Technology Research and Development
National Coordination Office
National Science Foundation
2415 Eisenhower Avenue
Alexandria, Virginia 22314

RE: Comments of ACT | The App Association, *Request for Information on the Development of an Artificial Intelligence (AI) Action Plan* (90 FR 9088)

Dear Mr. D'Souza:

ACT | The App Association (App Association) appreciates the opportunity to submit views to the National Science Foundation's Networking and Information Technology Research and Development (NITRD) National Coordination Office (NCO) in response to its request for information on behalf of the Office of Science and Technology Policy (OSTP) to inform the development of an Artificial Intelligence (AI) Action Plan.[1] The App Association is committed to accomplishing policy actions needed to sustain and enhance America's AI dominance, and to ensure that unnecessarily burdensome requirements do not hamper private sector AI innovation.

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The App Association represents thousands of small business software application development companies and technology firms that create the technologies that drive internet of things (IoT) use cases across consumer and enterprise contexts. Today, the value of the ecosystem the App Association represents—which we call the app economy—is $1.8 trillion and is responsible for 6.1 million American jobs, while serving as a key driver of the $8 trillion IoT revolution.[2] Alongside the world's rapid embrace of mobile technology, our members create the innovative solutions that power IoT across modalities and segments of the economy. We support OMB's goal of ensuring federal agencies instill proper safeguards that prioritize economic and national security, privacy,

[1] NSF, *Request for Information on the Development of an Artificial Intelligence (AI) Action Plan*, 90 FR 9088 (2025), available at: https://www.federalregister.gov/documents/2025/02/06/2025-02305/request-for-information-on-the-development-of-an-artificial-intelligence-ai-action-plan.

[2] ACT | The App Association, State of the App Economy (2022), https://actonline.org/wpcontent/uploads/APP-Economy-Report-FINAL.pdf.

civil liberties and more when utilizing AI and other advancements in technology and innovation.

AI-driven algorithmic decision tools and predictive analytics are having, and will continue to have, substantial direct and indirect effects on Americans. Some forms of AI are already in use to improve American consumers' lives today; for example, AI is used to detect financial and identity theft and to protect the communications networks upon which Americans rely against cybersecurity threats.

Moving forward, across use cases and sectors, AI has incredible potential to improve American consumers' lives through faster and better-informed decision making enabled by cutting-edge distributed cloud computing. As an example, healthcare treatments and patient outcomes stand poised to improve disease prevention and conditions, as well as efficiently and effectively treat diseases through automated analysis of X-rays and other medical imaging. AI will also play an essential role in self-driving vehicles and could drastically reduce roadway deaths and injuries. From a governance perspective, AI solutions will derive greater insights from infrastructure and support efficient budgeting decisions.

Today, Americans encounter AI in their lives incrementally through the improvements they have seen in computer-based services they use, typically in the form of streamlined processes, image analysis, and voice recognition (we urge consideration of these forms of AI as "narrow" AI). The App Association notes that this "narrow" AI already provides great societal benefit. For example, AI-driven software products and services revolutionized the ability of countless Americans with disabilities to achieve experiences in their lives far closer to the experiences of those without disabilities.

Nonetheless, AI also has the potential to raise a variety of unique considerations for policymakers, making the Administration's planned AI Action Plan a timely and necessary foundation for future government AI policies. We strongly encourage alignment of the AI Action Plan with the App Association's comprehensive AI policy principles:

1. Harmonizing and Coordinating Approaches to AI

A wide range of federal, local, and state laws prohibit harmful conduct regardless of whether the use of AI is involved. For example, the Federal Trade Commission (FTC) Act prohibits unfair or deceptive acts or practices, and states also have versions of these prohibitions in their statutes. The use of AI does not shield companies from these prohibitions. However, federal and state agencies alike must approach the applicability of these laws in AI contexts thoughtfully and with great sensitivity to the novel or evolving risks AI systems present. Congress and other policymakers must first understand how existing frameworks apply to activities involving AI to avoid creating sweeping new authorities or agencies that awkwardly or inconsistently overlap with current the AI Action Plan.

2. Quality Assurance and Oversight

The AI Action Plan should utilize risk-based approaches to ensure that the use of AI aligns with any relevant recognized standards of safety, and efficacy. Small software and device companies benefit from understanding the distribution of risk and liability in building, testing, and using AI tools. To the extent, the AI Action Plan addresses liability, it should ensure the appropriate distribution and mitigation of risk and liability. Specifically, those in the value chain with the ability to minimize risks based on their knowledge and ability to mitigate should have appropriate incentives to do so. Some recommended areas of focus include:

- Ensuring AI is safe and efficacious.
- Encouraging AI developers to consistently utilize rigorous procedures and enabling them to document their methods and results.
- Encouraging those developing, offering, or testing AI systems intended for consumer use to provide truthful and easy-to-understand representations regarding intended use and risks that would be reasonably understood by those intended, as well as expected, to use the AI solution.

The AI Action Plan should ensure that agencies apply existing policies to the use of AI prior to advancing new policies to only fill existing gaps; foster a risk-based approach to recognize the diverse and heterogenous use cases for AI; and align to international standards—including ISO42001 life cycle quality management standard.

The App Association also urges OSTP to align with our recommendations on the roles and interdependencies in the AI value chain, which support the theme of a shared responsibility for safety and efficacy.[3] In this framework, the App Association proposes clear definitions of stakeholders across the healthcare AI value chain, from development to distribution, deployment, and end use; discusses roles for supporting safety, ethical use, and fairness for each of these important stakeholder groups that are intended to illuminate the interdependencies between these actors, thus advancing the shared responsibility concept.

3. Thoughtful Design

The AI Action Plan should encourage design of AI systems that are informed by real-world workflows, human-centered design and usability principles, and end-user needs. AI systems should facilitate a transition to changes in the delivery of goods and services that benefit consumers and businesses. The design, development, and success of AI should leverage collaboration and dialogue among users, AI technology developers, and other stakeholders to have all perspectives reflected in AI solutions.

[3] This framework is included as **Appendix A** to this comment.

4. Access, Infrastructure, and Affordability

The AI Action Plan should enable products and services that involve AI systems to be accessible and affordable. Significant resources may be required to scale systems. Policymakers should also ensure that developers can build accessibility features into their AI-driven offerings and avoid policies that limit their accessibility options.

The U.S. government should take proactive measures to strengthen American AI infrastructure to ensure access and affordability. The AI Action Plan should:

- Provide federal agencies with greater authority to site and permit interstate transmission lines deemed critical to national interests. This includes streamlining approvals and, if necessary, leveraging eminent domain.
- Prevent states from imposing regulations that disproportionately burden data centers that are critical for AI processing.
- Accelerate the development of domestic nuclear power, including small modular reactors (SMRs), through streamlined regulations, tax incentives, and loan guarantees. This will provide a stable, low-carbon power source for data centers.

5. Data Bias

The errors in datasets used for AI innovation will remain one of the more pressing issues with AI systems that utilize machine learning techniques in particular. Regulatory agencies should examine data provenance and bias issues present in the development and uses of AI solutions to ensure that bias in datasets does not result in harm to users or consumers of products or services involving AI, including through unlawful discrimination.

6. Research and Transparency

The AI Action Plan should support and facilitate research and development of AI by prioritizing and providing sufficient funding while also maximizing innovators' and researchers' ability to collect and process data from a wide range of sources. Research on the costs and benefits of transparency in AI should also be a priority and involve collaboration among all affected stakeholders to develop a better understanding of how and under which circumstances transparency mandates would help address risks arising from the use of AI systems.

We appreciate President Trump's acknowledgment, in the January 23 Executive Order establishing the President's Council of Advisors on Science and Technology, of the critical research and innovation enabled by initiatives such as the National Science Foundation's National Artificial Intelligence Research Resource (NAIRR). Launched in 2024, NAIRR provides researchers with access to datasets, models, training, cloud computing, and AI credits to drive groundbreaking advancements in AI applications across defense, healthcare,

energy, and other sectors vital to U.S. competitiveness. However, the technology developer-donated credits that support NAIRR will expire at the end of the two-year pilot. While Congress has allocated some funding for the program's administration, NAIRR's continuation depends on congressional appropriations for researcher technology credits. The NAIRR Task Force—formed under the National AI Initiative Act of 2020, signed into law by President Trump—estimated that sustaining NAIRR requires $2.25 billion in federal appropriations over six years to ensure researchers have the resources needed to develop transformative AI solutions and address society's most pressing challenges. The task force recommended congressional appropriations of $750 million every two years, and we urge the Administration to incorporate this essential funding into future budget proposals to Congress.

7. Modernized Privacy and Security Frameworks

The many new AI-driven uses for data, including sensitive personal information, raise privacy questions. They also offer the potential for more powerful and granular privacy controls for consumers. Accordingly, any policy framework should address the topics of privacy, consent, and modern technological capabilities as a part of the policy development process. Requirements created pursuant to the AI Action Plan must be scalable and assure that an individual's data is properly protected, while also allowing the flow of information and responsible evolution of AI. A balanced framework should avoid undue barriers to data processing and collection while imposing reasonable data minimization, consent, and consumer rights frameworks.

8. Standards

The advantages of industry-led standardization in AI development are well established and have been reinforced by the first Trump Administration in Executive Order 13859, which emphasized the need for the United States to drive the development of technical standards, reduce barriers to AI testing and deployment, and enable both new AI-driven industries and AI adoption across existing sectors. A key benefit of private sector and stakeholder participation in AI development is the flexibility it provides to adapt to the rapid evolution of the technology. American companies have been at the forefront of AI innovation, and the United States must continue to harness and support their leadership. The most effective approach is to sustain a private-sector-driven model, with strong government support.

While private industry should lead AI standardization efforts, the U.S. government plays a vital role in supporting and participating in these initiatives. This includes providing resources, investing in research to sustain America's AI dominance, and facilitating contributions to global standards. Additionally, the Trump Administration should take proactive steps to prevent AI standardization from being undermined by standard-essential patent (SEP) challenges that have

affected other technologies, such as cellular and Wi-Fi. The longstanding U.S. model—where the government promotes and backs private, voluntary, and consensus-based standard setting—remains the best path forward.

The United States has the leading global patent system due to its strong emphasis on developing mechanisms that support innovation and foster competition and technological progress. When patent holders choose to contribute their technologies to a technical standard, they understand and agree that their patents may be needed to enable reasonable access to the standard and provide standard-setting organizations (SSOs) with a commitment that they will license their SEPs on fair, reasonable, and non-discriminatory (FRAND) terms to balance the anticompetitive risks associated with standard setting. The SEP holder understands and agrees that, by contributing to the standardization process, it cannot unduly exclude competitors from a standard past requiring a license on FRAND terms. Opportunistic SEP holders have distorted this system by taking advantage of SSO policies that have ambiguous definitions of FRAND to manipulate a fair licensing negotiation process by, for example, overcharging or refusing to license to certain entities in a supply chain. Since SSOs facilitate access to technical standards that touch various industries, these opportunistic SEP holders plague many verticals, always looking for the next market to extract additional and unrelated value for their SEP. The anticompetitive harms experienced in the SEP licensing ecosystem disrupt fair usage of technical standards that support efficient innovation.

The AI Action Plan should position the U.S. government to:

- Restrict the ability of foreign SEP holders to impose injunctions on U.S. companies in foreign jurisdictions.
- Leverage diplomatic influence to pressure foreign governments to prevent their courts from enabling SEP-related hold-ups that disadvantage American businesses.
- Implement domestic safeguards to curb SEP hold-up, including reforming the U.S. International Trade Commission (ITC) to limit foreign entities from leveraging costly SEP exclusion orders against U.S. companies; and defending the Supreme Court's *eBay* decision, which eliminated the automatic presumption of injunctions in patent disputes.

9. Global Leadership and Trade

To maintain America's AI leadership, the AI Action Plan must include a strong international strategy that keeps foreign markets open to U.S. AI. To achieve this and strengthen both economic and national security, we urge you to advance a U.S.-led vision of innovation-driven AI governance, protect critical AI assets, and prevent foreign governments from obstructing U.S. AI innovators and deployers. We encourage the AI Action Plan to address the U.S. role as a global leader that advocates for a holistic vision of trustworthy AI rooted in American values,

designed to empower workers, and drive global economic growth. The AI Action Plan should enable the U.S. government to:

- Proactively engage with foreign governments to prevent harmful AI policies that undermine U.S. leadership, restrict commercial AI deployment, or block significant U.S. AI investments.
- Refine and enforce export control policies to restrict adversaries' access to critical technologies.
- Reinforce core U.S. digital trade policies to uphold cross-border data flows, resist forced data localization, and protect AI's algorithmic integrity (including model weights) from exploitation or coercive transfers, ensuring AI's full potential is realized.
- Aggressively safeguard U.S. digital market access from policies that erode competitiveness, seek unauthorized access to trade secrets, or impose excessive taxes and regulatory burdens on American companies, such as the European Union's (EU's) AI Act and the EU's Digital Markets Act.
- Strengthen a trusted AI ecosystem that secures national and economic interests, including critical infrastructure, by enhancing cybersecurity measures.
- Embed AI priorities into the negotiating framework of future trade agreements, including free trade agreements and industry-specific accords.
- Lead the AI and digital agenda across key international forums (UN, G7, WTO, G20, OECD), ensuring the United States remains at the forefront of global AI governance.
- Proactively engage with foreign governments shaping AI regulations to safeguard U.S. market access and champion an innovation-driven approach—advocating for adherence to global technical standards, leveraging existing regulatory frameworks where applicable, and promoting pro-innovation policies like open government data.

10. Education

The AI Action plan should support education for the advancement of AI, promote examples that demonstrate the success of AI, and encourage stakeholder engagements to keep frameworks responsive to emerging opportunities and challenges.

- Consumers should be educated as to the use of AI in the service(s) they are using.
- Academic education should include curriculum that will advance the understanding of and ability to use AI solutions.

11. Intellectual Property

The protection of intellectual property (IP) rights is critical to the evolution of AI. In developing approaches and frameworks for AI governance, policymakers should

ensure that compliance measures and requirements do not undercut safeguards for IP or trade secrets.

AI is an important tool for innovators and authors of creative works to use in their process to develop IP protected works. Similarly, AI as we know it is constantly evolving, and its capability is not fully realized at this time. In order to continue incenting innovative and creative works within the AI space and through the assistance of AI, the U.S. Patent and Trademark Office and the U.S. Copyright Office must focus their IP issuance and registration analysis on the amount of human involvement rather than AI involvement.

While promoting transparency, we advise against disclosing proprietary information, such as training data. The mere fact that a model was trained on specific data does not guarantee its effectiveness for a given use case. Instead, the scientifically sound and industry-standard approach to assessing performance is testing the model in its intended environment using data representative of the target population.

The App Association appreciates OSTP's consideration of the above views.

Sincerely,

Brian Scarpelli
Senior Global Policy Counsel

Chapin Gregor
Policy Counsel

ACT | The App Association
1401 K St NW (Ste 501)
Washington, DC 20005
202-331-2130

ACT | The App Association AI Roles & Interdependency Framework

Overview: Artificial Intelligence (AI), especially generative AI, is already a powerful tool for consumers and companies. App Association small business members have a vital role in advancing AI's positive impacts by identifying new and novel opportunities where the responsible use of AI can solve expensive problems and provide new efficiencies for consumers and businesses.

While AI capabilities are already positively transforming American society, the App Association also recognizes that the same capabilities raise unique challenges that the government, private sector, and others have an important role in addressing across development, distribution, deployment, and end use phases. The App Association has worked proactively with its diverse and innovative community of small businesses to develop this consensus taxonomy, which describes the roles and interdependencies of various actors in the value (or supply) chain of AI solutions. These roles include several AI/ML developer subgroups, deploying organizations, end users, standard-setting organizations, certification and test beds, specialty boards and licensing bodies, and academic institutions. Many of these stakeholders map to actors in the National Institute for Standards and Technology's (NIST's) AI Risk Management Framework (RMF), which we indicate on the far right of the matrix below.

While the App Association has created comprehensive policy principles for AI governance, there we have several recommendations from this roles and interdependencies document. **The App Association recommends: (1) that requirements placed on small business AI developers and users be based on demonstrated harms; (2) the leveraging of a risk-based approach to AI harm mitigation where the level of review, assurance, and oversight is proportionate to those demonstrated harms; and (3) that those in AI value chains with the ability to minimize risks based on their knowledge and ability have appropriate responsibilities and incentives to do so.**

ACT | The App Association AI Roles & Interdependency Framework

Stakeholder Group	Definition	Roles	NIST AI RMF Actor Tasks
AI/ML Developers	Someone who designs, codes, researches, or produces an AI/ML system or platform for internal use or for use by a third party. **See below for defined Subgroups of this Stakeholder Group along with recommendations specific to that Subgroup.**	• Informing deployers and users of data requirements/definitions, intended use cases/populations and applications (e.g., disclosing sufficient detail allowing providers to determine when an AI-enabled tool should reasonably apply to the individual they are treating), including whether the AI/ML tools are intended to augment human work versus automate workflows, and status of/compliance with all applicable legal and regulatory requirements. • Prioritizing safety, effectiveness, transparency, and data privacy and security from the earliest stages of design, leveraging (and, where appropriate, updating) existing AI/ML guidelines on research and ethics, leading standards, and other resources. • Employing algorithms that produce repeatable results and, when feasible, are auditable, and make decisions that comply with relevant sector-specific requirements. • Using risk management approaches that scale to the potential likely harms posed in intended use scenarios to support safety, protect privacy and security, avoid harmful outcomes. • Providing information that enables those further down the value chain can assess the quality, performance, and utility of AI/ML tools. • Aligning with relevant ethical obligations and international conventions on human rights and supporting the development of new ethical guidelines to address emerging issues.	AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight

Stakeholder Subgroup	Definition	Roles	NIST RMF Actor Tasks
Foundation Model Developer	Someone who creates or modifies large and generalizable machine learning models that can be	***Building on the cross-AI/ML Developer roles noted above:*** • Assessing what efficacy and safety issues might be present in its Foundation Model,	AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors;

Stakeholder Subgroup	Definition	Roles	NIST RMF Actor Tasks
	used/adapted for various downstream tasks and applications, such as natural language processing, computer vision, or software development.	and documenting steps taken to mitigate those issues in its Transparency Documentation (e.g., Transparency Notes, System Cards and product documentation). • Providing clear guidance on (1) how to use and adapt its Foundation Model for various foreseeable downstream tasks and applications, and (2) what limitations or risks may arise from doing so based on challenges discovered during testing and deployment.	Domain Expert; AI Impact Assessment; Governance and Oversight
AI Platform Developer	Someone who leverages existing foundation models and builds an industry-agnostic platform that enables other developers to access, customize, and deploy these models for various use cases and applications, such as natural language processing, computer vision, and/or software development.	***Building on the cross-AI/ML Developer roles noted above:*** • Testing for, identifying, and mitigating safety issues that may arise from using or modifying existing foundation models for its AI Platform, and documenting these issues and steps taken to address them in its transparency documentation (e.g., transparency notes, system cards and product documentation).	AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight
Use Case AI Platform Developer	Someone who creates or uses AI-powered platforms that are tailored for a particular domain or sector. These platforms may leverage foundation models (or other types of machine learning models or solutions), such as AI platforms, that are suitable for domain-specific	***Building on the cross-AI/ML Developer roles noted above:*** • Meeting specific requirements and standards of the domain to address unique accuracy, efficacy, explainability, and compliance needs. • Testing for, identifying, and mitigating any efficacy and safety issues that may affect domain-specific outcomes or performance needs, and documenting these issues and the steps it has taken to address them in its transparency	AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight

Stakeholder Subgroup	Definition	Roles	NIST RMF Actor Tasks
	problems and data sources.	documentation (e.g., transparency notes, system cards and product documentation).	
AI Solution Developer	Someone who creates complete digital tools and technologies for a domain. They may build or incorporate AI solutions with both use case AI platforms, which are specialized for the domain, and AI platforms, which are more general and adaptable for various use cases and applications.	***Building on the cross-AI/ML Developer responsibilities noted above:*** • Specifying appropriate uses for its solution to avoid amplifying safety issues that may exist in the underlying foundation models, AI platforms, or domain-specific AI platforms. • Designing user interfaces to enable an end user to safely and effectively act upon the output of the tool, such as providing explanations, feedback mechanisms, or human oversight options, providing clear documentation to Deploying Organizations and Users to help them avoid safety issues.	AI Deployment; Operation and Monitoring; Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight

Stakeholder Group	Definition	Roles	NIST AI RMF Actor Tasks
Deploying Organization	Someone who is deploying solutions built by AI Solution Developers. They may also have their own internal IT staff that employ use case AI platforms or general AI platforms to develop their own custom AI solutions.	*Respecting that managing AI/ML risks will be more challenging for small to medium-sized organizations depending on their capabilities and resources:* • Adopting AI/ML Developer instructions for use, specifying appropriate uses for Users through governance policies to avoid safety issues that may exist in the underlying foundation models, AI platforms, or use case AI platforms. • Developing and leveraging solutions that augment efficiencies in automation, facilitate administrative simplification/reduce workflow burdens, and are fit for purpose. • Setting organization policy/designing workflows to reduce the likelihood that a User will act upon the output	AI Deployment; Operation and Monitoring; Domain Expert; AI Impact Assessment; Procurement; Governance and Oversight

Stakeholder Group	Definition	Roles	NIST AI RMF Actor Tasks
		of the tool in a way that would cause efficacy or safety issues (tailored explanations, feedback mechanisms, and/or human oversight options). • Assuring that AI/ML systems allow for the individualized assessment of domain-specific circumstances and flexibility to override automated decisions, ensuring that use of AI/ML does not improperly reduce or withhold intended benefits or inappropriately override human judgement. • Developing support mechanisms for the use of AI/ML by providers based on validation, aligning with decision-making processes familiar to the domain and high-quality evidence. • Developing organizational guidance on how the AI solution should and should not be used. • Creating engagement pathways to support dialogue with AI use case developers, AI solution developers, or any other applicable AI/ML developer, to enable ongoing updates to address evolving risks and benefits of AI solution uses. • Creating risk-based, tailored communications and engagement plans to enable easily understood explanations to customers about how the AI solution was developed, its performance and maintenance, and how it aligns with the latest best practices and regulatory requirements.	
AI End Users	Someone who directly interacts with or benefits from the AI solutions that are built by AI Solution Developers or by the internal IT staff of the Deploying Organization.	*Respecting that managing AI/ML risks will be more challenging for small to medium-sized organizations depending on their capabilities and resources:* • Aligning with consensus AI/ML definitions, present-day and future AI/ML solutions, the future of AI/ML changes and trends. • Taking required training and incorporating employer guidance about use of AI/ML solutions. • Documenting (through automated processes or otherwise) and reporting any issues or feedback to the	AI Deployment; Operation and Monitoring; Domain Expert; AI Impact Assessment; Procurement; Governance and

Stakeholder Group	Definition	Roles	NIST AI RMF Actor Tasks
		developer, such as errors, vulnerabilities, or harms (where AI/ML's use is known by the User). • Ensuring there is appropriate review of the output or recommendations from each AI solution prior to acting on it to make decisions, if relevant (where AI/ML's use is known by the User). • Raising awareness of and acting according to customers' rights and choices when using AI solutions, such as consent, access, correction, or deletion of their personal data.	Oversight; Human Factors
Standard-Setting Organizations	An organization whose primary function is developing, coordinating, promulgating, revising, amending, reissuing, interpreting, or otherwise contributing to the usefulness of technical standards to those who employ them.	• Developing and promoting adoption of international voluntary/non-regulatory consensus standardized approaches and resources to steward a shared responsibility approach to technology standards that include or are otherwise related to AI.	Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight
Certification Bodies & Test Beds	A certification body is a third-party organization that assures the conformity of a product, process or service to specified requirements. A test bed is a platform for conducting rigorous, transparent, and replicable testing of scientific theories, computing tools, and new technologies to a standard.	• Creating and making available transparent and reliable processes for the assurance of conformity to voluntary AI standards. • Creating and making available voluntary sandbox environments to help evaluate the usability and performance of AI/ML-based high-performance computing applications to advance the understanding of how reliable and efficacious AI, and to provide an appropriate assurance of reliability and efficacy.	Test, Evaluation, Verification, and Validation (TEVV); Human Factors; Domain Expert; AI Impact Assessment; Governance and Oversight
Accrediting and Licensing Bodies, Specialty Societies and Boards	Accrediting and licensing bodies are governing authorities that establish the suitability of any participating certification body. Notably, state-level boards serve	• Based on needs and expertise, developing and setting the standard of practice/behavior and ethical guidelines to address emerging issues with the use of AI/ML in the relevant domain. • Identifying the most appropriate uses of AI-enabled technologies and developing and disseminating	Test, Evaluation, Verification, and Validation (TEVV); Human

Stakeholder Group	Definition	Roles	NIST AI RMF Actor Tasks
	this purpose for certain professions to standards set by each state. Specialty societies are organizations for specialized professionals.	guidance and education on the responsible deployment of AI/ML, both generally and for specialty-specific uses.	Factors; Domain Expert; AI Impact Assessment; Governance and Oversight
Academic Education Institutions	Tertiary educational institutions, professional schools, or forms a part of such institutions, that teach and award professional degrees.	• Developing and teaching curriculum that will advance understanding of and ability to use AI/ML solutions responsibly, which should be assisted by inclusion of data scientists and engineers as instructors as needed. • Developing curriculum to advance the understanding of data science research to help inform ethical bodies.	Human Factors; Domain Expert; AI Impact Assessment