

## **Artificial Intelligence (AI) Risk Management Framework Concept Paper**

We reviewed the below NIST Draft and appreciate this effort and the opportunity to provide the below comments for your consideration:

General Comments: Listed Comments by Page and Line number in accordance with the format provided in this draft.

Page 3

Line 31 – Recommend update as follows: stakeholders must have the opportunity to contribute to and comment on the AI RMF development.

Line 32 – Recommend update as follows: Be clear. Use plain language that is understandable by a broad audience inclusive of all stakeholders including individuals with disabilities, senior executives, government officials, NGO leadership, and, more broadly, those who are not AI professionals,

Line 38 – Recommend adding at end of sentence- inclusive of all stakeholders including individuals with disabilities and Section 508 compliance as applicable to ensure access to common language and understanding to manage AI risks and bias.

Line 40 – Recommend updating sentence - readily adaptable and inclusive of assistive technology as applicable and as part of an organization’s broader risk management strategy and processes to ensure inclusive of all diverse stakeholders in the general population.

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Line 11 – Recommend adding at the end of the sentence- so diverse feedback from stakeholder’s representative of the diverse general population including access for individuals with disabilities is collected to evolve further this framework.

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Line 6 – Recommend updating sentence - representing multiple departments of the organization, and includes stakeholders from outside the organization inclusive of individuals with disabilities and representative of diversity in the general public.

Page 6

Line 15- Recommend updating sentence - data collection, curation, or selection, problem formulation, and stakeholder discussions inclusive of diversity in the general population and including individuals with disabilities accommodations for access as applicable.

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Line 1 - Recommend updating sentence - Decision making throughout the AI lifecycle is informed by a demographically and disciplinarily diverse team of stakeholders representative of a diverse general population including inclusion of individual with disabilities.