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To: aiframework <aiframework@nist.gov>

Subject: Comments for 2nd draft of the NIST AI RMF

Thanks so much for allowing us to participate in this work!!!

A couple of high-level comments:

Dangers of Metrics (§3.2.1 & §6)

We encourage adding a caution to this section regarding potential pitfalls of oversimplification that should be avoided when assessing human harms via metrics. For example, Moss et al note that “impacts” measured as “metrics” may be bent to the organizational and bureaucratic needs of institutions - this abstraction opens the opportunity for real harms to become missed, warped, or erased. Further, oversimplification in the process of “metricifying” has created problems in several fields. Saxena et. al note that the use of metrics in assessing child welfare via singular metrics for algorithmic case tracking can erase critical nuance, and also open cases to gamification from human workers who struggle to get algorithmic systems to adjudicate resources according to their discretion. Additionally, Christin studies the use of metrics in journalism, finding that humans respond to metrics in unexpected, locally contingent ways - it's hard to anticipate how humans will react to, use, and operate with, alongside, and underneath metrics.

Increased Emphasis on Recovery Plans (§6.4)

The Manage function currently focuses heavily on continuous evaluation & mediation but places little emphasis on recovery planning. While §3.2.3 notes that “ incidents and failures cannot be eliminated”, aside from the mention of “decommissioning, incident response, and change management” in Manage 4, there is little clear discussion regarding recovery from realized harms vs. managing of risks (aka prevention of harm). Recovery plans prove very useful in many forms of traditional safety engineering, the RMF does not go into much detail or discussion on how these may exist in the space of AI systems.

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