

**Subject:** Fw: Call for Comments on Four Principles of Explainable Artificial Intelligence  
**Date:** Friday, August 21, 2020 at 9:22:28 AM Eastern Daylight Time  
**From:** Ashley P. Moore  
**To:** NIST Explainable AI  
**CC:** James Reeves  
**Attachments:** IT Governance of AI AS Draft 3 APM 8-2020.pdf, GPI-Artificial-Intelligence-Part-III.pdf, GPI-Artificial-Intelligence.pdf, GPI-Artificial-Intelligence-Part-II.pdf, A governance framework for algorithmic accountability and transparency.pdf, Algorithm Accountability Report 2020 Working Draft 9 APM.pdf, aiareport2018.pdf

Greetings,

Thanks for the opportunity to provide comment on the 4 proposed Principles.

In our research to develop an Executive Branch Agency CIO led AI Governance program that leads to the adoption of various AI tools we found that there were 7 overarching principles used within the private sector and within the accredited auditing sector. Our findings are based for current proposed U.S. Legislation on Algorithm Accountability, AI Impact Assessments process, Audit domain (See attached), IEEE Guidance and Standards work--to include current standards development by ISO, New York AI Taskforce, and the Canadian Government Algorithm Impact Assessment work.

#### **Governance of ADS/AI Principles:**

- **Principle 1** — Organizational Governance: Provide sufficient oversight into the internal/external impact assessments, governance, ethics, and accountability of the use of these technologies around the agency, within public/private sector agreements and established service level agreements
- **Principle 2** — Human Rights: Ensure the use of these technologies do not infringe on local, national, and internationally recognized human rights
- **Principle 3** — Prioritizing “Human-in-the-Loop”: Ensure during the use of these technologies the command chain that authorizes the use is documented and approved to the extent where the commands flow down to a human to support specific actions and/or task
- **Principle 4** — Accountability: Ensure that within the procurement documentation and server level agreements (SLAs) that the designers and operators are responsible and accountable throughout the life cycle of the technology
- **Principle 5** — Transparency: Privacy, and Data Management: Ensure these technologies operate in a transparent manner, meet federal privacy and data management requirements as these technologies and use evolves
- **Principle 6** — ADS/AI Technology Misuse and Awareness: Minimize the Strategic, Operational, and technical risks of their misuse
- **Principle 7** — ADS/AI Cybersecurity Eco-system(s) Requirements: Ensure the organization is protected and the architecture of such technologies are transparent to all leadership, include top-down bottom-up empowerment, ownership, and responsibility, and the need to consider system deployment contexts

Thanks again for the opportunity.

If you have any questions, please feel free to contact me anytime.

**Mr. Ashley P. Moore, MBCI**  
**USAGM--Office of the Chief Information Officer (CIO)**  
**IT Risk Management Division**  
**IT Business Analyst (IT/IS/ICT/Cloud/Shared/Partnerships)**  
**ADS/AI Capabilities in USAGM**  
United States Agency for Global Media (USAGM)  
330 Independence Avenue, SW  
Washington, DC 20237

**Cell:**

*"I am certain that after the dust of centuries has passed over our cities, we, too, will be remembered not for victories or defeats in battle or in politics, but for our contribution to the human spirit." ~ John F. Kennedy (1962)*

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**From:** NIST AI Program <ai.nist@service.govdelivery.com>  
**Sent:** Monday, August 17, 2020 4:47 PM  
**To:** Ashley P. Moore  
**Subject:** Call for Comments on Four Principles of Explainable Artificial Intelligence

**NIST**

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**Cybersecurity Insights**

# Call for Comments on Four Principles of Explainable Artificial Intelligence

NIST invites you to comment on the first draft of [Four Principles of Explainable Artificial Intelligence \(NISTIR 8312\)](#). The paper presents four principles that capture the fundamental properties of explainable Artificial Intelligence (AI) systems. These principles are heavily influenced by an AI system's interaction with the human receiving the information. The requirements of the given application, the task, and the consumer of the explanation will influence the type of explanation deemed appropriate. Our four principles are intended to capture a broad set of motivations, applications, and perspectives.

To characterize the diverse methods, applications, and perspectives of explainable AI, we are seeking comments on our white paper. Please submit comments by email to [explainable-AI@nist.gov](mailto:explainable-AI@nist.gov). We encourage you to submit comments using the [form provided on this page](#). Anonymous comments are accepted. However, including your name and contact information enables the authors to contact you for clarification if necessary. **All comments will be made public as-is, with no edits or redactions.** Please be careful to not include confidential business or personal information, otherwise sensitive or protected information, or any information you do not wish to be posted.

A call for patent claims is included in the front matter of this draft. For additional information, see the [Information Technology Laboratory \(ITL\) Patent Policy](#).

Any questions should be directed to [explainable-AI@nist.gov](mailto:explainable-AI@nist.gov).

**The comment period for this document is August 17, 2020 through October 15, 2020.**

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