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RE: National Priorities for Artificial Intelligence

The Data Foundation is a non-profit organization that seeks to improve government and society by using data to inform public policymaking. Our Data Coalition project is America's premier voice on data policy, advocating for responsible policies to make government data high-quality, accessible, and usable.

Agencies' ability to apply modern data practices, facilitate knowledge sharing, and successfully deploy new technologies can enable a more effective, efficient public sector, and we are enthusiastic about OSTP's collaborative approach to identify national priorities for AI. As OSTP works to develop a unified National Artificial Intelligence Strategy, the Data Coalition encourages OSTP to ensure that our national priorities for AI include considerations for data readiness and data governance to ensure trustworthy, ethical, and successful AI adoption.

Data is a crucial input for AI technologies. This necessitates thoughtful consideration of data policies to ensure that AI development and use are ethical and responsible. Not only do the data sets used to train AI need to be evaluated and audited for bias, fairness, and accuracy, important questions about the fitness for use, privacy, and other equity considerations must also be answered. Dedicating the necessary resources and consideration to manage and govern government data in an open, responsible way, as well as incorporating diverse perspectives to understand challenges and opportunities that may not otherwise be identified, can help the federal government create an AI strategy that can address risks associated with AI.

It is important to note how critical it is to the success of a national strategy that government action on AI be grounded in transparent processes. The recent rapid evolution of AI has sparked enthusiasm and innovation across the country, but has simultaneously sparked fear and distrust. In order for the country to harness the potential of AI and leverage it for innovation and competitive advantage, transparency must be central to any government approach.

The Data Foundation recommends that OSTP include the following consideration in their national priorities for AI, and apply these not only to the AI technologies themselves but to the data that serve as the foundation for these efforts.

> *Transparency*
> A national strategy should focus on full and transparent implementation of agencies' AI strategies and use case inventories, as required by Executive Orders 13859 and 13960,

respectively. Many agencies have made progress on implementing AI strategies, and agencies can look to these publicly-available documents to inform their own approaches. Agencies should identify specific steps, responsible oversight bodies, and performance metrics in AI plans, including calibrating the need for AI learning solutions.

Data Sharing

The continued implementation of the [Foundations for Evidence-Based Policymaking Act](#) – including implementing data standards and open data requirements, maturing data governance, and promoting secure data sharing and public trust – can help support data readiness and transparency for AI development and adoption across government. In developing a national AI strategy, OSTP should consult with the Chief Data Officers Council and other data expertise within government to support government wide efforts.

Further, revitalizing efforts such as the [Federal Data Strategy](#) can provide another mechanism to make sure data sharing can support AI efforts in a consistent and effective way across the entire federal enterprise.

Data Literacy

Understanding the federal workforce's capacity is a key component of ensuring AI readiness. Building digital literacy of the existing workforce in addition to hiring and retaining top data and AI talent must also be prioritized. Without a workforce and leadership that can effectively leverage existing data assets, develop and operate emerging technologies, and understand key risks and how to mitigate potential problems that arise, there is little chance of successful implementation of a national AI strategy. OPM's [occupational series](#) on data science can help guide appropriate hiring for data roles, and various agencies have established data or AI training programs to support employees. To promote a uniform baseline level of data literacy, the expertise of existing interagency bodies can be leveraged to develop a government-wide program.

Stakeholder Engagement

Stakeholder engagement is a key mechanism for building evidence, contributing diverse perspectives to inform decision-making. Collaboration with academia, industry, impacted communities, and other stakeholders should be an integral part of creating an environment that facilitates responsible AI. These external partnerships can help mitigate bias or other risks related to AI,ensure the government is leveraging existing knowledge to develop new insights, and promote transparency and accountability.

There are various approaches to engagement, ranging from simply informing to empowering individuals, that are appropriate for different needs. Existing official processes, such as the Federal Register, allow agencies to solicit feedback from the public and relevant stakeholders, while requiring agencies to make responses publicly available. However, in certain instances, deeper engagement may be necessary. Effectively preparing for and establishing sustainable processes to continue gathering feedback can contribute to improving interactions with the government and building trust.

Further Resources:
- The Data Coalition published a [policy brief](#) outlining key considerations for safe, efficient, and effective data management to ensure federal agencies' AI readiness.
- Data Foundation's [Data Literacy for the Public Sector](#) identifies key lessons and recommendations for developing data literacy programs in federal agencies.
- The Data Foundation's [Stakeholder Engagement Toolkit](#) provides key considerations and strategies for engaging stakeholders in a meaningful, useful way.

As OSTP considers various AI challenges and opportunities, we urge that transparency, data sharing, data literacy, and stakeholder engagement are included in the priorities for a national strategy on AI. These concepts provide a foundation for future AI design, development, and deployment to be safe, effective, and equitable – and can leverage existing policies that promote sound data practices, ultimately contributing to trustworthy AI.

We would welcome the opportunity to further discuss the role of existing data policies and collaboration in developing a national approach to artificial intelligence. Please reach out to me at corinna.turbes@datafoundation.org with any questions.

Sincerely,
Corinna Turbes
Policy Director