Request for Information (RFI) on an Implementation Plan for a National Artificial Intelligence Research Resource: Responses

October 1, 2021

Wendy Wigen
 2415 Eisenhower Avenue
Alexandria, VA 22314, USA

Re: Request for Information (RFI) on an Implementation Plan for a National Artificial Intelligence Research Resource:

Ms. Wigen:

Thank you for the opportunity to provide comments on the implementation plan for a National Artificial Intelligence Research Resource.

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 Initiative operates as America's premier voice on data policy, advocating for responsible policies to make government data high-quality, accessible, and usable. The Data Coalition supports policies that encourage responsible, ethical deployment of innovative and emerging technologies that foster rigorous data analysis for improved decision-making, while facilitating equitable data use and appropriate privacy protections.

Artificial intelligence and machine learning technologies can have real, tangible benefits for the research community, but that requires access to large amounts of high quality data. AI researchers may need data from multiple government agencies, different levels and branches of government, as well as non-profit or private sector organizations. Our current data infrastructure is decentralized and fragmented, and large portions of it are out of date, unable to keep up with the technical demands of privacy and data sharing that could be beneficial for research on AI and research conducted with AI.

With that in mind, the Data Coalition recommends the task force explore how to create a modern data access and linkage infrastructure for researchers inside and out of the government, in particular the creation of a National Secure Data Service. Both the 2016 Commission on Evidence Based Policymaking[1] (Evidence Commission) and the Committee on National Statistics[2] recognized the need to improve data access and strengthen privacy protections and recommended establishing a new entity in the federal government to support data linkage and combination activities, mechanisms for

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[1] U .S. Commission on Evidence-Based Policymaking (CEP). The Promise of Evidence-Based Policymaking: Final Report of the Commission on Evidence-Based Policymaking. Washington, D.C.: Government Publishing Office, 2017a.

[2] National Academies of Sciences, Engineering, and Medicine (NASEM) Committee on National Statistics (CNSTAT). Innovations in Federal Statistics: Combining Data Sources While Protecting Privacy. Washington, D.C.: The National Academies Press, 2017a. Available at: https://doi.org/10.17226/24652.

improving data access, and enhancements for privacy with new and emerging technologies, all of which would benefit AI research.

Several proposals have been circulated on ways in which a National Secure Data Service can be established, consistent with the recommendations of the Evidence Commision. Four such proposals are outlined in a 2020 report from the Data Foundation on design considerations for such a service, including legal authority for privacy protections, ability to access and acquire data, as well as scalability and sustainability.[3] Additional efforts to establish a data service are underway in Congress, with the introduction of the National Secure Data Service Act (H.R. 3133). The Advisory Committee for Data for Evidence-Building is also working to make recommendations on how to facilitate data sharing, data linkage and privacy enhancing techniques, with publication expected later in the year.

We encourage the task force to consider how to sync efforts to create an Artificial Intelligence Research Resource with existing efforts to create a National Secure Data Service as a way to address the structural challenges to improving access to data in a secure setting.

Thank you for the opportunity to provide feedback on plans for an Artificial Intelligence Resource. We welcome any questions on our comments and look forward to supporting your efforts in this area.

Sincerely,

Corinna Turbes
Policy Director

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[3] Hart, N. R., & Potok, N. (2020). (rep.). *Modernizing U.S. Data Infrastructure: Design Considerations for Implementing a National Secure Data Service to Improve Statistics and Evidence Building*. Washington, DC: Data Foundation. https://www.datafoundation.org/modernizing-us-data-infrastructure-2020