Samantha Hubner

Artificial Intelligence Policy Advisor

Office of Management and Budget

725 17th Street, NW Washington, DC 20405

April 29, 2024

Subject: Request for Information: Responsible Procurement of Artificial Intelligence in Government

Ms. Hubner,

The Coalition for Government Procurement ("the Coalition") appreciates the opportunity to respond to the Office of Management and Budget's (OMB's) Request for Information on the Responsible Procurement of Artificial Intelligence (AI) in Government. Attached, please find a spreadsheet of anonymized member responses to OMB's questions. Please be advised that the comments do not necessarily reflect the consensus view of the membership.

By way of background, the Coalition is a non-profit association of firms selling commercial services, products, and solutions to the Federal Government. Our members collectively account for tens of billions of dollars of the sales generated through the GSA Multiple Award Schedules (MAS) program, VA Federal Supply Schedules (FSS), the Government-wide Acquisition Contracts (GWAC), and agency specific multiple award contracts (MAC). Coalition members include small, medium, and large businesses that account for more than $145 billion in Federal Government contracts. The Coalition is proud to have worked with Government officials for more than 40 years towards the mutual goal of common-sense acquisition.

Coalition members believe that, when possible, the Federal government should utilize existing authorities and methods to purchase artificial intelligence, along with existing standards that reflect the best practices for security within the commercial marketplace. Additionally, OMB's guidance should establish that, when soliciting AI solutions, agencies should prioritize the desired outcome, as opposed to the utilization of a specific technology. Agencies should conduct market research and utilize requests for information to promote open competition and ensure that the best value is provided while achieving agency missions. Finally, regarding managing the performance and risks of AI, the Coalition reiterates the importance of utilizing existing contract language for commercial products and services. We note that existing regulation, such as the National Institute of Standards and Technologies Risk Management Framework, provides a starting point, but standards should evolve as feedback from vendors and agencies percolates with experience.

Member comments also show that access to a firm's data should recognize the need to protect sensitive information, and that the Federal government needs to ensure the security of the information or risk reducing vendor market participation. Access to documentation, data, and other technical information should mirror that which is normally provided in commercial transactions. Regarding standards to reduce the risk of harmful AI generated content, member comments show that OMB should leverage existing practices and standards to mitigate these risks while prioritizing vendors that conduct responsible development and deployment of AI.

The Coalition hopes that you find the attached comments useful and thanks you for your time and consideration.

Sincerely,

Roger Waldron

President