Submission by ModelCard.ai concerning the NIST AI Executive Order – February 2, 2024

ModelCard.ai is a recently founded company that takes an updated approach to the traditional model card. The attached academic paper was partially funded by ModelCard.ai and explains the theoretical underpinning for our business. The academic paper, which is under consideration for publication, reimagines the traditional model card by reinvigorating it with aspects of trustworthiness and risk management.

In response to the Request for Information (RFI) Related to NIST's Assignments Under Section 4.1, 4.5 and 11 of the Executive Order Concerning Artificial Intelligence (Sections 4.1, 4.5, and 11), ModelCard.ai makes this submission. We provide this academic paper, which was authored by the co-founders of the company in their academic capacities, as the attachment to our submission for the RFI for the NIST AI Executive Order.

With regard to 1. Developing Guidelines, Standards, and Best Practices for AI Safety and Security, the entire academic paper provides insights into AI evaluation.

For 3. Advance Responsible Global Technical Standards for AI Development, Section 4 of the academic paper examines the convergence of core characteristics for trustworthiness in recent publications by NIST (AI RMF 1.0), the European Commission's High-Level Expert Group on Artificial Intelligence (Ethics Guidelines for Trustworthy AI), and the Organisation for Economic Co-operation and Development (OECD Recommendation of the Council on Artificial Intelligence).