



May 3, 2024

Steering Committee
Artificial Intelligence Code of Conduct (AICC) Project
National Academy of Medicine
500 5th Street NW
Washington, DC 20001

RE: Artificial Intelligence in Health, Health Care, and Biomedical Science: An AI Code of Conduct Principles and Commitments Discussion Draft

Dear Members of the AICC Steering Committee:

The American Academy of Nursing (Academy) agrees that the Code of Conduct Principles and Commitments in the discussion draft entitled *Artificial Intelligence in Health, Health Care, and Biomedical Science: An AI Code of Conduct Principles and Commitments* are clear as well as concise. We offer additional thoughts for the AICC Steering Committee to consider as you move forward with the project.

For over 50 years, the Academy has served the public by advancing health policy and practice through the generation, synthesis, and dissemination of nursing knowledge. Academy Fellows are inducted into the organization for their extraordinary contributions to improving health locally and globally. With over 3,000 Fellows, the Academy represents nursing's most accomplished leaders in policy, research, administration, practice, and academia.

The vision of the Academy is *Healthy Lives for All People*. To actualize this vision, the Academy's mission is to improve health and achieve health equity by influencing policy through nursing leadership, innovation, and science. Artificial Intelligence (AI) is no longer novel yet continues to evolve and is currently being utilized in a multitude of ways. This technology assists through diagnosing diseases, predicting outcomes, and recommending treatments for patients and can be an impactful tool. The implications for the health care workforce and health care delivery are still emerging— creating a potential gateway to greater efficiencies and reduced burden on providers. The Academy agrees with NAM that AI has the potential to disrupt and transform health care and we also share NAM's concerns that AI could further exacerbate health inequities, patient safety, and privacy.ⁱ

As health care stakeholders, writ large, move forward to investigate the balance between AI being a positive disruptor and a privacy crisis, it is evident that the advancements will pose challenges to all sectors and traditional structures will eventually struggle to keep pace. This will ultimately further the access gap between well-resourced and limited-resourced institutions. Therefore, we strongly recommend consideration of the impact AI will have on health equity as NAM develops the AI Code Principles and Commitments. Further, to ensure the inclusive adoption of these code principles and commitments the voices of nurses and health care professionals who are experts in AI will be vital in managing the short-term and long-term benefits and risks of AI to the nation's health as legislation, and federal regulations continue to emerge.

Additionally, NAM will need to consider the ethical issues associated with AI as it develops the AI Code Principles and Commitments. Through different venues, the Academy has long advocated for all patients

to have access to information, education, and privacy related to their health care.ⁱⁱ As AI plays an increasingly important role in the provision of patient care, research, and education, it is imperative that patients and consumers are aware of the opportunities and limitations of AI in their own health care. We are confident NAM will take this into consideration moving forward.

Also, we recommend NAM consider patient, provider, and system burden as the AI Code Principles and Code Commitments are developed. The Academy supports efforts to reduce regulatory and redundancy burdens on daily practice while balancing patient privacy protections. In order to achieve the goal of placing the patient at the center of care delivery, policies must equally support providers and systems. The expected learning curve for providers as well as patient communities will need to be considered and we encourage NAM to seek public input from patients, health care providers, and systems on how to promote the benefits of using AI and also limit any burdens of use.

As NAM moves forward in continuing its work on AI and the discussion draft, we recognize this is the first step of many and look forward to working with NAM in the future to finalize the AI Code Principles and Code Commitments. If our organization can be of any assistance, or if you have any questions or need additional information, please contact the Academy's Chief Policy Officer, Christine Murphy, at cmurphy@AANnet.org or 202-777-1170.

Sincerely,



Linda D. Scott, PhD, RN, NEA-BC, FNAP, FAAN
President

ⁱ National Academy of Medicine. 2019. *Artificial Intelligence in Health Care: The Hope, the Hype, the Promise, the Peril*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/27111>.

ⁱⁱ Starkweather, A. R., Coleman, B., Barcelona de Mendoza, V., Fu, M. R., Menzies, V., O'Keefe, M., & Williams, J. K. (2018). Strengthen federal regulation of laboratory-developed and direct-to-consumer genetic testing. *Nursing Outlook*, 66(1), 101–104. <https://doi.org/10.1016/j.outlook.2017.11.004>.