



The Institute of
Internal Auditors

Elevating Impact

November 30, 2023

The Honorable Ted Lieu
United States House of Representatives
2454 Rayburn House Office Building
Washington, DC 20515

The Honorable Ken Buck
United States House of Representatives
2455 Rayburn House Office Building
Washington, DC 20515

The Honorable Anna Eshoo
United States House of Representatives
272 Cannon House Office Building
Washington, DC 20515

RE: IIA Proposed Enhancement to the National AI Commission Act

Dear Representatives Lieu, Buck, and Eshoo:

On behalf of The Institute of Internal Auditors (The IIA), the international professional organization representing thousands of internal auditors in California and Colorado, I write to recommend the addition of internal audit expertise as one of the qualifications for service on the National AI Commission established pursuant to H.R. 4223.

Section 3(d) of the National AI Commission Act requires prospective commission members to possess “a demonstrated background in at least one of the following” areas:

- Computer science or a technical background in artificial intelligence
- Civil society, including relating to the Constitution, civil liberties, ethics, and the creative community
- Industry and workforce
- Government, including national security

While the commission’s composition prioritizes member expertise in the application of AI (both technical and legal), it does not adequately represent the pivotal interests of AI-related governance, compliance, and risk management. For example, as companies from all industries and sectors race to harness the potential power of this emerging technology, it is imperative that organizations:

- Institute processes for effectively identifying and mitigating potential AI-related risks; and,
- Establish appropriate internal controls and independent oversight frameworks

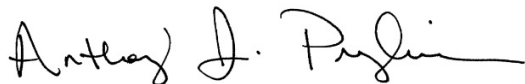
An organization’s internal audit function – operating in conformity with the *International Standards for the Professional Practice of Internal Auditing* – is the independent entity responsible for ensuring objective assurance over AI-related risk management and internal control processes. The presence of an internal audit function is widely considered a corporate governance essential practice for not only promoting organizational transparency and accountability but protecting the interests of American consumers.

Due to internal audit's central role in evaluating risk and controls related to AI, The IIA believes the profession can meaningfully contribute to the work of the National AI Commission. Therefore, recognizing the unique perspective of internal audit on critical AI topics, The IIA respectfully requests an amendment to Section 3(d) establishing internal audit as one of the qualifications for service on the commission.

Should you have any questions regarding this matter, please do not hesitate to contact Michael Downing, IIA's Senior Director of US Advocacy, at Michael.Downing@TheIIA.org.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Anthony J. Pugliese". The signature is written in a cursive style with a long, sweeping underline.

Anthony J. Pugliese, CIA, CPA, CGMA, CITP
President and Chief Executive Officer
The Institute of Internal Auditors

cc: Members of the Congressional Artificial Intelligence Caucus