

May 16, 2025

The Honorable John Hickenlooper
United States Senate
316 Hart Senate Office Building
Washington, DC 20510

RE: IIA Denver Chapter Comments Regarding the VET AI Act

Dear Senator Hickenlooper:

On behalf of the Denver chapter of The Institute of Internal Auditors (The IIA), I would like to extend my appreciation for your continued engagement with The IIA regarding the development of the *Validation and Evaluation for Trustworthy Artificial Intelligence (VET AI) Act*.

As representatives of the internal audit profession in Colorado, IIA Denver believes the *VET AI Act* – as introduced in the 118th Congress – represented a critical step in promoting effective and consistent safeguards over emerging AI technologies. Moreover, your collaboration with The IIA ensured this strong legislative foundation was bolstered by emphasizing the pivotal role of internal assurance and risk management processes.

In preparation for the reintroduction of the *VET AI Act* in 2025, The IIA recently supplied commentary on a revised draft of the proposed legislation. Specifically, The IIA recommended the following amendment to the definition of “internal artificial intelligence assurance” in Section 3(6):

INTERNAL ARTIFICIAL INTELLIGENCE ASSURANCE —The term “internal artificial intelligence assurance” means an independent evaluation of an artificial intelligence system conducted by the party being evaluated, with an internal reporting structure directly to the organization’s governing body, that encourages impartial evaluations and prevents conflicts of interest, for the purpose of—

Although this modification may appear minor, IIA Denver believes it is **fundamental** in strengthening the **independence and objectivity** of internal assurance functions. The establishment of a direct reporting relationship between an internal assurance function, such as internal audit, and the organization’s governing body is essential for the following reasons:

- Reduces the potential for “conflicts of interest” since internal assurance providers should not report to management
- Ensures internal assurance is supplied with appropriate resources (financial, staffing, technological, etc.) to properly conduct artificial intelligence evaluations
- Guarantees the governing body receives objective assurance on the development and deployment of artificial intelligence systems

The IIA’s proposed amendment to the *VET AI Act*, in our professional judgement, will enhance the legislation by creating a truly independent internal assurance function. Such a dynamic will ensure the governing body receives accurate, objective, and continuous evaluations concerning the organization’s utilization of AI technologies.

Should you have any specific questions regarding this proposal, or if The IIA can provide further assistance, please contact Tera Proby, IIA's Manager of US Advocacy, at Tera.Proby@TheIIA.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Denis Gorgemans". The signature is fluid and cursive, with the first name "Denis" being more prominent than the last name "Gorgemans".

Denis Gorgemans
President
Institute of Internal Auditors
Denver Chapter