U.S. Chamber of Commerce

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July 14, 2025

Dr. Jay Bhattacharya
Director
National Institutes of Health
Office of the Director
1 Center Drive, MSC 0148, Room 126
Bethesda, MD 20892-0148

**RE: Response to NIH RFI NOT-OD-25-117 – NIH Artificial Intelligence Strategic Vision[1]**

Dear Dr. Bhattacharya:

The U.S. Chamber of Commerce ("Chamber") is grateful for the opportunity to comment on the National Institutes of Health's ("NIH") strategic planning process regarding artificial intelligence (AI), as outlined in Request for Information NOT-OD-25-117. The Chamber represents over three million businesses and organizations across sectors and regions.

Artificial Intelligence has profoundly impacted the healthcare community for decades. From the development of the Causal Associational Network (CASNET) in the 1970s[2], which assisted doctors in tracking information to treat specific patients, to current applications that accelerate disease diagnoses[3] and aid in repurposing drugs[4] for orphan diseases, AI's contributions are substantial.

The Chamber recognizes the healthcare sector as one of the largest beneficiaries of ongoing advancements in artificial intelligence. This is exemplified by last year's Nobel Prize in Chemistry awarded to Demis Hassabis and John Jumper for their work on AlphaFold[5], which predicts protein structures from amino acid sequences.

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[1] https://grants.nih.gov/grants/guide/notice-files/NOT-OD-25-117.html

[2] Kulikowski, C. A. "An Opening Chapter of the First Generation of Artificial Intelligence in Medicine: The First Rutgers AIM Workshop, June 1975." *Yearbook of Medical Informatics*, vol. 10, no. 1, 2015, pp. 227-233. doi:10.15265/IY-2015-016. PMC4587035.

[3] Blanco-González, Alexandre, et al. "The Role of AI in Drug Discovery: Challenges, Opportunities, and Strategies." *Pharmaceuticals*, vol. 16, no. 6, 18 June 2023, article 891, doi:10.3390/ph16060891. PMC10302890.

[4] Cortial, Lucas, et al. "Artificial Intelligence in Drug Repurposing for Rare Diseases: A Mini-Review." *Frontiers in Medicine*, vol. 11, 22 May 2024, article 1404338, doi:10.3389/fmed.2024.1404338. PMC10302890.

[5] The Royal Swedish Academy of Sciences. "The Nobel Prize in Chemistry 2024." NobelPrize.org, Nobel Prize Outreach, 9 Oct. 2024, https://www.nobelprize.org/prizes/chemistry/2024/press-release/.

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The Chamber appreciates the NIH's development of a strategic vision on Artificial Intelligence from the Office of the Director. This initiative aims to create a unified approach across NIH to reduce silos, enhance transparency, and accelerate research and development, ultimately driving further drug discoveries and saving lives.

Given the complexity of many topics within the request, the Chamber requests additional opportunities to discuss these matters. This will enable us to provide clear and actionable recommendations that the Office of the Director can implement to achieve its objectives.

Therefore, the Chamber offers the following high-level principles from the Chambers AI Principles[6] which were developed to help the advancement of AI through providing a stable policy environment to help foster innovation and trust in AI.

## I. RECOGNIZE TRUSTWORTHY AI IS A PARTNERSHIP

Fostering public trust and trustworthiness in AI technologies is necessary to advance its responsible development, deployment, and use. Trustworthy AI encompasses values such as transparency, explainability, fairness, and accountability. The speed and complexity of technological change, however, mean that governments alone cannot promote trustworthy AI. The Chamber believes that governments must partner with the private sector, academia, and civil society when addressing issues of public concern associated with AI. We recognize and commend existing partnerships that have formed in the AI community to address these challenges, including protecting against harmful biases, ensuring democratic values, and respecting human rights. Finally, any governance frameworks should be flexible and driven by a transparent, voluntary, and multistakeholder process.

## II. SUPPORT PRIVATE AND PUBLIC INVESTMENT IN AI RESEARCH & DEVELOPMENT

Investment in research and development (R&D) is essential to AI innovation. Governments should encourage and incentivize this investment by partnering directly with businesses at the forefront of AI, promoting flexible governance frameworks such as regulatory sandboxes, utilizing testbeds, and funding both basic R&D and that which spurs innovation in trustworthy AI. Policymakers should recognize that advancements in AI R&D happen within a global ecosystem where businesses, universities, and institutions collaborate across borders.

## III. BUILD AN AI-READY WORKFORCE

AI brings significant opportunities, but as with any technological advance as some challenges, to the workforce. Governments should partner with businesses, universities, and other stakeholders to build a workforce suited for an AI economy. These investments will

[6] See U.S. Chamber AI Action Plan Comments *available at* https://files.nitrd.gov/90-fr-9088/US-Chamber-of-Commerce-AI-RFI-2025.pdf.

ensure that workers are prepared to use AI tools and adapt to changing workforce needs. Moreover, policymakers should take steps to attract and retain global and diverse talent.

## IV. PROMOTE OPEN AND ACCESSIBLE GOVERNMENT DATA

AI requires access to large and robust data sets to function. Governments possess substantial amounts of data that should be made available and easily accessible in a structured, commonly used, and machine-readable format to accelerate the development of AI while ensuring appropriate and risk-based cybersecurity and privacy protections. Governments at all levels should improve the quality and usability of data sets through, for example, greater digitization, standardized documentation and formatting, and additional budgetary resources.

## V. CONCLUSION

The Chamber believes that NIH has an opportunity to provide a clear and strategic vision which promotes the advancement of artificial intelligence for the development of globally competitive biomedical AI ecosystem. As NIH finalizes its AI strategic plan, we would encourage further opportunities to discuss specific actions the Office of the Director can take to provide necessary synergies throughout the NIH, but also with industry to ensure further advancement. The Chamber stands ready to partner with NIH and other federal agencies to ensure that the United States continues to lead in responsible AI innovation, while improving the health and lives of all Americans.

We appreciate the opportunity to contribute and look forward to continued engagement in shaping the future of health AI.

Sincerely,
US Chamber of Commerce