March 14, 2025

Mr. Kirk Dohne, Acting Director
National Coordination Office
Networking and Information Technology Research and Development Program
National Science Foundation
2415 Eisenhower Avenue
Alexandria, VA 22314

RE: AI Action Plan

Submitted electronically via regulations.gov and email to ostp-ai-rfi@nitrd.gov

Dear Mr. Dohne:

The future of American healthcare and Artificial Intelligence (AI) stand at a crossroad. As AI brings transformative capabilities to health and wellness and promises solutions to long-standing challenges, we face a critical choice:

- Embrace American innovation and creativity with smart oversight, or
- Risk stifling progress through excessive regulation of data and AI model development/deployment.

Velatura Public Benefit Corporation (www.velatura.org) is pleased to submit comments on the Request for Information (RFI) on the Development of an Artificial Intelligence (AI) Action Plan. We are enthusiastic about accelerating AI adoption in healthcare with appropriate governance models that protect patients, families, and clinicians – and drive entrepreneurship and digital prosperity. We support the Trump administration's goals that expand the uses of AI in health care in favor of American innovation, economic competitiveness, and a light-touch regulatory regime.

Our experience as the country's leading healthcare interoperability and Trusted Data Sharing Organization (TDSO) network, serving fourteen states, has shown us both the tremendous potential and the practical challenges of developing, governing, and implementing AI in healthcare settings. Velatura's *Digital Prosperity Initiative* (DPI) - rooted in our TDSO model and outcomes-based smart governance - is designed to help individuals and families organize, protect, and leverage their digital and data resources

to enhance resilience, preparedness, and overall well-being. DPI provides individuals and families with the tools and knowledge to ensure their "digital house" is in order, creating a foundation for long-term prosperity and security, starting with wellness and health.

The challenge we face is not simply about managing newer technologies, it is about fundamentally rethinking how we govern AI in healthcare settings. Current approaches focus too heavily on restrictive data input and model controls that create unnecessary barriers between innovative solutions and the patients who need them. These bureaucratic hurdles add costs and complexity without guaranteeing better outcomes or measurable new value. Our experience across healthcare processes, systems, and governance models has revealed a fundamental truth: the greatest challenge with AI governance is not about data privacy, algorithmic bias, or model management. The real issue lies in how AI increasingly shapes critical healthcare decisions affecting all stakeholders in the American healthcare ecosystem.

AI Census – an Outcomes-Based AI Governance Framework

Our American AI outcomes & accountability framework shifts the conversation from process to outcomes and results. Instead of creating new bureaucracies to regulate how data is sourced or how AI models are developed, we advocate for a system that judges AI by its impact on patient care and healthcare delivery. This approach, which we call "*AI Censu*," (Latin for Decision) creates clear lines of accountability while preserving the innovation and creativity that drives American healthcare AI forward.

In practice, this framework would work much like existing healthcare information protections. Organizations would track AI decisions with the same rigor they apply to Protected Health Information (PHI), creating secure, time-stamped records of each AI-driven healthcare decision. The advantage of this approach lies in its practical simplicity. Just as healthcare organizations maintain detailed patient records, they would secure these AI decision records, these "Censu Transactions" in encrypted, immutable form. This creates a clear chain of accountability without requiring creators to reveal proprietary AI methods or compromise competitive advantages.

These "Censu Transactions" become a powerful tool for understanding how AI affects patient care, finance, and associated events, allowing for:

- Monitoring real-time outcomes

- Identifying areas for continuous improvement
- Sharing best practices across systems
- Maintaining clear accountability for decisions

An output versus input AI governance framework serves multiple purposes. It helps healthcare organizations improve their AI systems based on real-world results. It provides transparency and creates a robust audit trail that protects against errors while promoting continuous improvement. Critical to this framework is maintaining the human element in healthcare decision-making. When care providers modify or override AI recommendations, these actions are documented to create valuable learning opportunities for AI systems, healthcare professionals, and patients. This human-AI collaboration represents the future of healthcare—technology augmenting and assisting, rather than replacing, human judgment.

The implications of this framework extend beyond individual healthcare decisions. By creating a dynamic ontology-driven way to track and evaluate AI outcomes, we establish a foundation for sharing best practices across healthcare systems while protecting proprietary information. This balance between transparency and innovation is crucial for advancing American healthcare. By implementing this output-focused AI governance framework, we can

- Accelerate healthcare AI innovation without sacrificing accountability
- Reduce administrative burden while improving oversight
- Allow for backward analysis to identify root causes of harmful outcomes including data, model construction, and model operations
- Protect patient privacy while enabling purposeful improvements
- Ensure responsibility lies with the implementing organization rather than being diffused through technical compliance

Economic Empowerment & Digital Prosperity with Health AI

Our Digital Prosperity Initiative demonstrates how an AI Censu approach can also economically empower individuals and families in addition to bringing transparency and value. When patients understand how wellness, healthcare, and AI influence care decisions or economic/prosperity implications, they become active participants in their care rather than passive recipients. This engagement leads to better outcomes and

more efficient healthcare delivery—goals that align with the administration's healthcare priorities.

Through Velatura's Digital Prosperity Initiative, we have seen how individuals – when supported with the right AI tools and education take control of daily health management; become active participants in their treatment plans; and build deeper connections with those treating them. When individuals have access to private or public funding opportunities, innovation sandboxes, and access to synthetic health datasets, they are also able to create disease-specific AI tools for their unique needs; share solutions within their communities; and create entrepreneurial opportunities in healthcare.

This aligns perfectly with our AI Censu framework by emphasizing

1. AI Fidelity: the value of health AI should be determined by its users in their specific context, not by distant regulators or institutions

2. Light-Touch Regulation: while organizational AI requires robust oversight on outcomes, personal health AI tools created by individuals for their own use need flexibility to innovate. Our outcome-focused governance model naturally accommodates this distinction

3. Individual Ownership: individuals who create personal health AI solutions should retain intellectual property rights and economic benefits from their innovations

4. Open Innovation: Access to open-source AI platforms ensures democratic participation in healthcare innovation without regulatory capture by large technology companies.

Actionable Policy Framework

The path to realizing AI's full potential in American healthcare requires a balanced approach that promotes innovation while ensuring accountability. Picture a healthcare system where doctors can freely develop AI tools to improve patient care, where individuals create personalized health solutions, and where organizations can innovate without drowning in red tape. This is not just a vision—it is an achievable reality through four interconnected actions.

First, we must protect the fundamental American value of innovation through freedom to create. Just as early American inventors were not constrained by excessive regulation, today's AI innovators—whether they are physicians in rural clinics or patients managing chronic conditions—need the freedom to develop solutions that work for their specific needs. This freedom to innovate has always been the engine of American progress.

Second, this innovation must be balanced with clear accountability, which is where our AI Censu framework comes into play. Think of it as a digital ledger of AI decisions—not unlike how we track financial transactions or medical records. This creates transparency without bureaucracy, ensuring organizations take responsibility for their AI systems while protecting individual privacy.

Third, for those AI decisions that could significantly impact public safety—like diagnostic systems or treatment recommendations—we propose using blockchain technology to create an immutable record. This is not about restricting innovation; it is about creating a foundation for trust. Just as America's banking system relies on secure transaction records, critical healthcare AI decisions need a reliable, transparent tracking system.

Finally, we must invest in tools that help us understand and evaluate AI's impact. These assessment capabilities act like an early warning system, helping us identify both successful innovations and potential problems before they affect patient care. This investment ensures America maintains its leadership in responsible AI development while protecting public interests.

Together, these actions create a framework that encourages innovation while ensuring accountability—a uniquely American approach to advancing healthcare through AI.

A Call for Action

America's leadership in artificial intelligence demands a governance approach as innovative as the technology itself. By focusing on AI outputs rather than burdening development with excessive regulation, we create a framework that serves both innovation and accountability.

The AI Censu framework offers a practical path forward: clear accountability with minimal bureaucracy. It protects individual rights to create personal prosperity and

user-driven health AI solutions while maintaining necessary oversight of organizational AI systems. Most importantly, it creates new opportunities for personal prosperity through AI ownership and entrepreneurship—hallmarks of American innovation.

As AI transforms healthcare delivery, we have a unique opportunity to empower individuals, improve patient care, and maintain American leadership in this critical technology. The choice is clear: embrace an output-focused governance model that promotes innovation and personal prosperity, or risk stifling the next generation of healthcare breakthroughs with unnecessary regulation.

Velatura stands ready to work with the Trump administration to implement this vision of accountable, innovative, and prosperous AI development in American healthcare. The future of healthcare AI should be built by Americans, for Americans, with the light-touch oversight that has always encouraged our nation's enterprising spirit.

We thank OSTP and the National Science Foundation for the opportunity to respond to this RFI, and we look forward to collaborating with you to achieve American AI exceptionalism and excellence in health care.

Sincerely,

Tim Pletcher

CEO

Velatura Public Benefit Corporation

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