Comment from Government Member Alex Goodenough on *Using Algorithmic Tools in Regulatory Enforcement*
October 4, 2024

OMB has the following comments on the draft Recommendation for Committee on Regulation "Using Algorithmic Tools in Regulatory Enforcement":

Line 44: Add "the Use" and "Artificial" to correct title of EO.

Footnote 18 on page 4: "Off. of Sci. & Tech. Pol'y"

Line 74: Remove "regulated." It is unclear why those considerations should be limited to regulated persons rather than persons more broadly. Add "safety" to the list of considerations.

Line 113: Add "or outcome resulting from the use" after "use" to make clear that challenges can include those to outcomes stemming from the use of algorithmic tools rather than just the use of the tools themselves.

OMB has the following general comment on the draft report "Artificial Intelligence and Regulatory Enforcement" for consideration by the author: It is very late-breaking, but author may wish to review OMB's memo M-24-18 on AI acquisition released 10/3/24 and available here https://www.whitehouse.gov/wpcontent/uploads/2024/10/M-24-18-AI-Acquisition-Memorandum.pdf.