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Docket: NSF-2025-OGC-0001
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Comment On: NSF-2025-OGC-0001-0001
Request for Information: Development of a 2025 National Artificial Intelligence Research and Development Strategic Plan

Document: NSF-2025-OGC-0001-DRAFT-0099
Comment on FR Doc # 2025-07332

Submitter Information

Organization: American College of Radiology (ACR)

General Comment

Please see the attached comments of the American College of Radiology (ACR) regarding Docket ID No. NSF-2025-OGC-000, "Request for Information on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan." These comments were previously filed by ACR in response to the Feb. 6, 2025, "AI Action Plan" request for information.

Attachments

acr-comments_ai-action-plan_3-14-2025



March 14, 2025

AI Action Plan
Attn: Faisal D'Souza, NITRD NCO
2415 Eisenhower Avenue
Alexandria, VA 22314

Re: (90 FR 9088; 2025-02305) AI Action Plan; Comments of the American College of Radiology

The American College of Radiology (ACR)—a professional association representing more than 40,000 diagnostic radiologists, interventional radiologists, radiation oncologists, nuclear medicine physicians, and medical physicists—appreciates the opportunity to file comments with the White House Office of Science and Technology Policy (OSTP) and the Networking and Information Technology Research and Development (NITRD) National Coordination Office (NCO) to inform the future “AI Action Plan.” The following comments are a response to the Request for Information (RFI) published February 6, 2025 (90 FR 9088; 2025-02305).

Notice

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Background

The radiology physician specialty has long been the vanguard of healthcare AI, with over 1,000 AI-enabled software medical devices authorized by the U.S. Food and Drug Administration (FDA) to date. AI-enabled tools provide a wide range of augmentative functions for radiologists as they review and interpret medical imaging studies. These functions include prioritizing cases, detecting and highlighting abnormalities in imaging studies for radiologists to review, characterizing disease progression, assisting with image analysis to create data for inclusion by radiologists in their reports, and more.

Recognizing AI's promise to enhance patient care, the ACR established its Data Science Institute (DSI) in 2017 to advance safe, effective, and clinically useful radiology AI innovations. The ACR DSI collaborates with radiology professionals, industry, government, patients, and other stakeholders in developing programs and tools in support of implementation of AI applications that will help improve patient care. Initiatives include:

new and existing imaging services, including appropriate recognition of physicians and their practice expenses.

For AI innovations that provide valuable data and additive information unavailable to physicians and their patients without the use of the tools, new funding must come from outside of the current physician payment system. CMS should collaborate with radiologists and other physicians to define clinical value and identify innovations worthy of new payment.

III. Ensure healthcare AI is appropriately, safely, and effectively implemented and used by providers. The AI Action Plan should consider the quality and safety of AI implementations and appropriate medical use, such as via accreditation by FDA- or CMS-recognized accreditation bodies. These programs should ensure AI end-users within accredited facilities are qualified, adhere to standards of care and best practices, and have appropriate AI governance infrastructures and monitoring programs in place.

Accreditation programs are demonstrably successful at improving the quality and safety of healthcare services. For example, ACR has partnered with FDA and CMS on mandatory accreditation for mammography and advanced diagnostic imaging.

Thank you for your consideration of these healthcare-specific priorities for inclusion in the future AI Action Plan. The ACR invites collaboration with OSTP and NITRD NCO staff. Please contact Michael Peters, Senior Director, Government Affairs, at mpeters@acr.org, with questions.

Sincerely,

A black rectangular redaction box covering the signature of Dana H. Smetherman.

Dana H. Smetherman, MD, MPH, MBA, FACR
Chief Executive Officer
American College of Radiology