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General Comment

See attached file(s).

Attachments

250501 OSTP AI Plan GSA Comments

May 27, 2025

Submitted via <https://www.regulations.gov>

RE: Docket ID No. NSF-2025-OGC-0001

Office of Science and Technology Policy

To whom it may concern,

On behalf of the [Gerontological Society of America \(GSA\)](http://www.geron.org), we appreciate the opportunity to comment on the request for information on the National Artificial Intelligence (AI) Research and Development Strategic Plan (2023 Update). Further, we appreciate the Office of Science and Technology Policy (OSTP) updating the plan so the United States can secure its position as the unrivaled world leader in AI by performing research and development to accelerate AI-driven innovation, enhance American economic and national security, promote human flourishing, and maintain the United States' dominance in AI while focusing on the Federal government's unique role in AI research and development over the next 3-5 years.

GSA's mission is to foster excellence, innovation, and collaboration to advance aging research, education, practice, and policy, and our vision is "meaningful lives as we age." GSA's 6,000 members include gerontologists, health professionals, behavioral & social scientists, biologists, demographers, economists, and many other disciplines. These experts study all facets of aging with a life-course orientation. The multidisciplinary nature of the GSA membership is a valued strength, enabling the Society to provide a 360-degree perspective on the issues facing our population as we age. Our members come from more than 50 countries.

GSA [publishes five peer-reviewed journals](#) with research that advances the focus on biomedical research and social sciences, as well as [more than 60 interest groups](#) formed around a topic or issue that cuts across disciplines. One of our interest groups, "Technology and Aging," investigates possibilities for applying the results of rapid advances in technology to better the lifestyles of the growing number of older persons in a world-wide society.

AI holds transformative potential to support the health, independence, and well-being of America's aging population. From smart home technologies and wearable devices to virtual assistants and social robots, AI applications can empower older people, their caregivers, and all of us as we age.

However, to realize these benefits, we recommend AI systems that are intentionally and thoughtfully designed to consider the needs, preferences, attitudes, and abilities of older people and their caregivers. It is vital to include diverse age cohorts, including older people, in thoughtfully developing, implementing, and regulating AI.

Our evidence-based comments outline the promise of AI for older people, the critical barriers to its use, and recommended steps needed to ensure these technologies serve all Americans. We recommend the National AI Research and Development Strategic Plan reflect both the promise of these technologies for older people and the potential harms they may pose, promoting benefits while minimizing risks.

AI holds promise and can enhance daily life for older people across many domains. Smart systems can monitor health and detect emergencies, while wearables and virtual assistants may encourage activity, manage routines, and reduce cognitive burden on people age 65 and older. (Czaja & Ceruso, 2022). AI-powered tools can also help people age 65 and older access and integrate complex information on health, insurance, or finances, supporting decision-making even in the face of age-related cognitive change (Langston et al., 2024, 2025). For example, studies have shown that large language model-based AI assistants generate trustworthy information in response to carefully phrased questions about Medicare for people age 65 and older. (Langston et al., 2024).

There is an opportunity to remove barriers that older people may face in benefiting from AI technologies, and in some cases, may potentially experience harm.

- **Poor design for older users:** Many AI systems are overly complex, lack usability features, and fail to reflect the needs and capabilities of people age 65 and older. (Czaja & Ceruso, 2022).
- **Bias and exclusion:** AI models often reflect societal biases, including ageism. When older people are underrepresented in training datasets, the outputs may be less accurate, relevant, or fair (Chu et al., 2023; Saumure et al., 2025).
- **The digital divide:** Lower rates of technology adoption persist among people age 65 and older, and this includes AI-based technologies, meaning they are less likely to benefit (McClain, 2024).
- **Scams and misinformation:** Older people may be especially vulnerable to AI-driven fraud. Generative tools can, for example, create voice clones that mimic loved ones or officials, leading to emotional manipulation and financial exploitation (Napal, 2024).
- **Balancing digital and non-digital approaches:** AI tools should supplement, not replace, human contact and care. In healthcare, social support, and service delivery, face-to-face interactions remain essential for many, including older people. Relying too heavily on digital solutions may lead to social isolation and loneliness or unmet emotional needs, especially for those who value or depend on human connection.

GSA recommends the plan update reflect the following priorities:

1. **Fund the development of age-inclusive AI.**
Invest in research and development of AI systems specifically tailored to older people, including those living with cognitive impairment. Support public-private partnerships that advance age-inclusive design.
2. **Encourage the representation of older people in AI development.**
Encourage including older people in user-centered design and usability testing. Encourage diverse datasets that reflect variability across the lifespan.
3. **Regulate for safety, transparency, and fairness.**
Implement standards to detect and mitigate age-related bias in AI systems. Develop clear guidance for transparency, accountability, and safe use of AI in high-stakes domains.
4. **Educate and empower older users.**
Launch public education campaigns to help older people and their caregivers understand the benefits and risks of AI technologies. Provide training on safe, informed use.

5. **Protect against AI-driven scams.**

Strengthen consumer protections and enhance enforcement against AI-enabled fraud. Support tools and resources to detect and respond to scams targeting older people.

AI is reshaping the future of health, aging, and decision-making for all of us as we age. Its benefits will only be fully realized if the technologies are developed with age-inclusivity, ethics, and usability at the core. Proactive policy is essential to ensure that AI advances safety and quality of life for every generation

Thank you for the opportunity to provide input. If you have any questions, please contact Patricia D'Antonio, Vice President of Policy and Professional Affairs or Jordan Miles, Director of Policy.

Sincerely,

James C. Appleby, BSPHarm, MPH, ScD (Hon)
Chief Executive Officer

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