



October 27, 2025

Ms. Stacy Murphy
Deputy Chief Operations Officer/Security Officer
Office of Science and Technology Policy

Re: Regulatory Reform on Artificial Intelligence (AI) [Docket # OSTP-TECH- 2025-0067]

Dear Ms. Murphy:

The AI Integrators Council (AIIC) serves as the primary voice for leading companies working to integrate artificial intelligence into systems, platforms, and applications. The AIIC welcomes the opportunity to provide input to the White House Office of Science and Technology Policy as it seeks information from stakeholders on AI regulatory reform.

We support the federal government's efforts to provide guidance and regulatory reforms for AI policy to promote US innovation and advancement of this emerging technology. The AIIC was created to educate policymakers and other essential stakeholders about the complexity of roles, responsibilities, and relationships across the AI ecosystem and to advocate for policies based on an accurate understanding of this ecosystem. We are comprised of leading AI companies including Alteryx, Atlassian, Box, Cognizant, Docusign, Peraton, SAIC, Salesforce, and Twilio.

As AI continues to evolve and expand, the AIIC believes it is essential that federal AI policy fully reflects the complexity of the AI value chain—particularly the critical role played by integrators. Initial policy discussions, draft legislation and potential regulations have centered on binary definitions such as “developers” and “deployers” of AI models. However, between these two categories lies the AI integrator—an entity that connects, configures, and embeds AI systems within existing organizational processes and technology environments, but does not control the upstream development of AI models or the downstream deployment and management of AI solutions for end users. The AIIC advocates for forward-looking federal regulations on AI that recognize integrators and other actors in the AI value chain, and policy that anticipates the continuing evolution of the technology stack.

As the Administration seeks to create AI policy that supports innovation, the AIIC would like to draw attention to the following areas in need of federal intervention:

- Lack of clear definitions across the AI ecosystem
- Internationally recognized standards
- Inconsistent state-level AI regulations
- Outdated federal procurement processes for AI technologies

Recognition and Definition of Roles in the AI Ecosystem

US AI policy frameworks, including executive actions such as the AI Action Plan, AI executive orders, and guidance such as NIST's Generative AI Risk Management Framework (RMF), have yet to accurately define the distinct roles and responsibilities of key actors across the AI ecosystem. By relying on an overly simplistic “developer–deployer” distinction, existing policies overlook the layered and interdependent nature of the AI value chain, in which model developers, integrators, application developers, deployers, and infrastructure providers each play unique roles. For example, integrators are responsible for adapting and operationalizing AI models within client systems, but do not control foundational model design. Lack of clarity in federal regulatory technical frameworks like the NIST GenAI RMF, has led to overlapping compliance obligations, uncertainty around liability standards, and frequent contractual disputes over who bears responsibility for bias mitigation, explainability, and post-deployment oversight, often forcing integrators to assume disproportionate risk for upstream design flaws.

To address these issues, AI policy and regulatory efforts should adopt a role-based framework that assigns obligations in proportion to how each stakeholder's actions impact risk. Updating federal AI policy and technical frameworks to reflect these differentiated roles would clarify accountability, reduce litigation risk, and better align compliance with operational authority. This approach would not only promote innovation and investment by limiting uncertainty, but also provide a coherent model for international policymakers seeking to balance AI advancement with responsible governance.

Internationally Recognized Standards

US AI policy frameworks should also be built upon a foundation of internationally recognized technical standards. Much good work is underway at NIST and elsewhere, and the US Government should support these efforts in three ways. First, it should ensure sufficient resources are dedicated to developing these standards and to conducting global diplomacy necessary to harmonize international policy frameworks around these standards, as such harmonization is critical to minimizing cross-border compliance burdens for integrators operating globally. Second, and more relevant to OSTP's examination of regulatory reform, it should work to ensure internationally recognized technical standards accurately define roles, including the role of AI integrators, and appropriately allocate responsibilities as discussed above. Third, the government should rely upon these standards wherever possible in formulating or reforming relevant policies and laws to ensure that AI policies are rooted in technology-neutral, widely validated best practices.

Federal Regulatory Preemption

While federal rules have helped clarify some areas of AI development, inconsistencies are already emerging between state regulations, and, as additional states pursue AI legislation, these mounting inconsistencies could create major roadblocks for innovation.

Federal preemption of state AI regulations is essential to ensure a consistent, innovation-friendly national framework that avoids the fragmentation emerging from a growing patchwork of state-level rules. Without preemption, companies working with AI models and systems must navigate conflicting requirements across jurisdictions, from differing definitions of high-risk AI to inconsistent transparency and audit obligations, creating legal uncertainty that stifles investment and slows responsible adoption.

A unified federal standard would provide clarity on core obligations such as safety testing, data governance, and accountability. This approach would mirror other successful federal frameworks, such as those governing financial services and consumer protection, that establish baseline rules for emerging technologies while preventing regulatory arbitrage. Setting clear, predictable guardrails at the national level can enable greater US competitiveness in AI, and maintain America's leadership in technological innovation.

Finally, there is a need to harmonize AI regulations and legislation with those on the state and federal levels with respect to related areas such as privacy and cybersecurity, in order to prevent conflicts.

Updated Procurement of AI

Federal procurement rules were designed for static information technology systems and do not reflect the dynamic nature of artificial intelligence, which depends on iterative development and continuous learning. Current acquisition frameworks require fixed specifications, rigid approval cycles, and fixed-price deliverables, creating significant barriers for agencies seeking to deploy adaptive AI solutions. These constraints discourage phased experimentation, increase the risk of bid protests under the Federal Acquisition Regulation (FAR), and limit the ability of integrators to propose innovative, performance-based models.

Initiatives such as USAI.gov offer important opportunities to facilitate AI adoption through easier, speedier procurement of AI tools. However, in many cases, access to models alone will not help federal agencies solve pressing business challenges. Instead, these agencies need access to built-for-purpose platforms that integrate AI systems and tailor them to solve real-world challenges. The government should consider expanding on the USAI.gov initiative to establish an AI applications marketplace that allows the same easy, rapid acquisition of AI applications as it does AI models.

To modernize procurement, agencies should be empowered to adopt phased contracting models that enable iterative delivery and tie payments to clearly defined performance milestones. Additionally, regulatory sandbox frameworks should be implemented to allow controlled innovation and testing without triggering full re-certification requirements. Such reforms would preserve compliance with procurement law while enabling more flexible and adaptive AI integration, reducing contract disputes, and accelerating innovation across federal programs.

Conclusion

We encourage the Administration's continued work on regulation and guidance to support AI innovation in the US technology stack. The AIIC urges the Administration to recognize AI integrators as a distinct and indispensable part of the AI value chain and to ensure that future regulations and guidance reflect their critical role. Doing so will strengthen policy clarity, foster responsible innovation, and empower the companies driving AI adoption across industries. Thank you for your leadership on these critical issues. We look forward to continued collaboration as you work to promote AI innovation.

Sincerely,

Wes McClelland
Executive Director
AI Integrators Council