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2415 Eisenhower Avenue
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Re: Request for Information on the Development of an Artificial Intelligence (AI) Action Plan

As the bipartisan, national membership association representing state, county, and city human services agencies, the American Public Human Services Association (APHSA) welcomes the opportunity to submit comment on the Office of Science and Technology Policy's (OSTP) Request for Information on the Development of an Artificial Intelligence (AI) Action Plan. On behalf of our members and with their guidance and insights, APHSA encourages the Networking and Information Technology Research and Development National Coordination Office (NITRD NCO) to consider the following six focus areas in developing a Plan that enables:

1. Coordinated Federal Governance;
2. Streamlined Federal Funding Mechanisms;
3. Improved Service Delivery and Administrative Efficiency;
4. Enhanced Security Protections;
5. Informed Human Oversight and Expertise; and most importantly,
6. Sustained Thriving Communities

APHSA's members administer economic assistance and child and family well-being services and benefits – such as the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), child welfare and others – at the state, county, and city levels. Our members are experts in overseeing and aligning these programs, which bolster community well-being through access to food, health care, employment, child care, and other key building blocks. In addition, APHSA's members are leading experts in data analysis, health and human services Information Technology (IT) systems, workforce development and training, and legal dimensions of the sector.

By convening affinity groups such as IT Solutions Management for Human Services (ISM)[1] and the Public Human Services Attorneys (PHSA),[2] APHSA stays informed on common interests and concerns of IT and legal professionals in the human services sector. APHSA additionally convenes a Process Innovation Community of Practice focused on advancing process improvements in human services for more efficient service delivery and improved customer

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[1] For more information on ISM, see https://aphsa.org/ISM/.
[2] For more information on PHSA, see https://aphsa.org/PHSA/.

experience. The insights and recommendations contained in this comment letter are deeply informed by the insight and input of these member groups.

By incorporating the perspectives of human services agencies to establish a cohesive federal AI Action Plan, the Administration can empower states, counties, and cities to adopt responsible, community-oriented AI solutions. Taken together, these efforts can reduce administrative burdens, enhance service delivery, and uphold trust in government programs—ultimately benefiting taxpayers, agencies, and the communities they serve.

This letter also includes an appendix that synthesizes key issues and opportunities based on APHSA's Election Transition briefs, "Courageous Imperatives for Human Services," which offer strategic recommendations to the Administration and Congress, focusing on unlocking the full potential of human services to foster a thriving nation.[3]

Overview: Inputs & Engagements Informing Response

For decades, APHSA has supported members on core technology issues, including disruptive innovations that change the ways we can do business – from migration to the cloud to legacy system overhauls and beyond. Because AI regulations directly affect human services agencies, their staff, and their customers, we engaged them—through interviews, focus groups, working groups, conferences, and special initiatives—to gather insights on needs, priorities, and perspectives for using AI to streamline essential supports and services.

Across the human services ecosystem, we have observed a strong and growing interest in the secure and effective use of AI technology to optimize service delivery and improve customer experience. Not only are public agencies eager for innovation, but their partners ready to support and their customers eager to engage in discussions.

Key Considerations for the AI Action Plan

Leveraging its AI Action Plan ("Plan"), the Administration can catalyze innovation in the human services sector of government and ensure that unnecessarily burdensome requirements do not hamper AI innovation by facilitating the coordinated development of federal guidance across agencies that enables ensure responsible procurement, development, and implementation. As outlined earlier, we have identified six key focus areas for the AI Action Plan: 1) Coordinated Federal Governance; 2) Streamlined Federal Funding Mechanisms; 3) Improved Service Delivery; 4) Enhanced Security Protections; 5) Informed Human Oversight, and 6) Sustained Thriving Communities. Below, we offer specific strategies and examples for implementation in each of these focus areas.

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[3] For all of APHSA's Election Transition materials, visit: Election Transition Recommendations - APHSA

1. Coordinated Federal Governance

AI technology has become much more pronounced in IT solutions on the market in recent years. The opportunity for effective use of this advancing technology could be endless. Yet, the federal government's guidance on the use of AI remains fragmented, with each agency issuing its own separate directives. This approach runs the risk of repeating past experiences of each agency developing its own rules and guidance that are misaligned with other federal agencies/programs, or in the worst case, conflicts with the same. State, county, and city human services agencies stand to benefit greatly from a more coordinated approach across federal agencies that lead human services programs such as the Centers for Medicaid and Medicare Services (CMS), the Administration for Children and Families (ACF), and the United States Department of Agriculture Food and Nutrition Service (FNS). To this end, the Plan should include a set of strategies for adoption of a unified federal approach to AI governance, rulemaking, and procurement which will contribute to a more competitive and responsible AI ecosystem by aligning various affected parties under common frameworks and practices.

Effective technology modernization and AI adoption, policy simplification, and streamlined workflows can solve persistent challenges agencies face. By embracing AI and other technological innovations, agencies can create efficiencies that reduce administrative costs, directing more resources towards providing services. Such changes can enhance program outcomes, improve time and cost efficiencies for both workers and program participants, and strengthen program integrity. Despite significant interest at the state, county, and city levels of government, human services agencies have not yet been able to fully adopt technological advancements such as AI, robotic process automation (RPA), payment technology advancements, and other innovations that promise to improve the efficiency and effectiveness of human services.[4] This Administration has an opportunity to pursue a new path by publishing an AI Action Plan that promotes alignment across federal rules and guidance for consistent across federally-funded programs whenever possible, and to reverse policies that limit the use of these advanced technologies.

2. Streamlined Federal Funding Mechanisms

The federal government can make strategic investments in AI systems that align health, human services, and labor program delivery operations, while meeting data privacy and security standards, to enhance agency efficiency at scale, promote cross-agency and cross-program interoperability, and improve customer experience. Agencies at the state level recognize the need to secure AI-driven solutions according to federal funding streams and regulations; however, current guidance on funding eligibility and approval criteria remains unclear. They

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[4] For greater insight on how human services agencies hope to leverage advancements in AI, see APHSA's Courageous Imperatives installment on technology innovation: 01_07_2025-CI-Series_Driving-Human-Services-Tech_Final_01-07-2025.pdf

need more clearly defined AI investment criteria within APD submissions, including risk management strategies and proposal requirements to ensure timely approvals and funding.[5]

The Plan should include federal strategies for high-impact investments in public sector technology, such as through streamlining Advanced Planning Document (APD) completion processes. APDs play an important role in federal technology funding because these planning documents facilitate cost allocation across multiple federal programs for shared state services. Managed by State Systems Offices, APD submissions follow a formal procedure through which states obtain federal approval and financial participation for their technology projects. This process includes different requirements based on the risk assessment of the IT projects, ensuring compliance with federal regulations; typically, there are fewer requirements for lower-risk IT projects, and increased oversight for higher-risk projects.

Moreover, APHSA members appreciate that transparency in AI procurement is needed for solutions that allow agencies and customers to understand how and why their data is being used, shared, and stored. Federal support for assessing AI vendors could help for some agencies in selecting trustworthy solutions. Federal agencies should empower CAIOs, data and tech officers, privacy experts, customers, and other relevant parties to participate in every stage of AI procurement and implementation to promote privacy and security.

3. Improved Service Delivery and Administrative Efficiency

Many human services agencies are eager to harness AI to streamline operations and improve administrative efficiency and service delivery, particularly as they grapple with workforce shortages and outdated technology. AI can help address these issues especially when paired with strategies to streamline workflows, simplify tasks, and modernize outdated technology. AI tools can streamline service delivery and reduce administrative burdens by automating routine tasks, such as data entry, scheduling, note taking, and document verification. Predictive analytics could also be used to enhance outreach and targeted services, ensuring resources are efficiently delivered to eligible individuals at the correct benefit levels.

Some agencies have expressed strong interest in piloting responsible AI models; however, they are hindered by funding constraints, regulatory barriers, and lack of technical knowledge and support. To address this shared need across states, federal agencies should consider including in the Plan options for establishing fast-track approval pathways for AI uses, relaxed standards for AI uses in the proof-of-concept stage, and public-private partnerships with AI research institutions, universities, technology firms, and other key industry partners. Federal plans should prepare for bolstering worker technical literacy and proficiency using AI tools.

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[5] For more information on risk management strategies, agencies can reference the National Institute of Standards and Technology's AI Risk Management Framework.

Leaders across human services agencies recognize the power of leveraging technology and process improvements—like streamlining applications and modernizing outdated systems—to make services more seamless without growing government. Like their federal counterparts, state and county government leaders must be smart stewards of limited budgets and focus on using taxpayer dollars wisely while improving service delivery. To this end, the Plan should support the generation of AI-enabled efficiencies across the human services ecosystem that empower agency employees to focus their efforts on the more nuanced aspects of their roles, including building meaningful human-to-human interactions with community and centering mission-driven efforts that meet the expectations of taxpayers.

4. Enhanced Security Protections

The Plan should equip Federal departments with the capacity to provide support to human services agencies through funding, technical assistance, or any other targeted resources identified by human services agencies to promote safe AI implementation and mitigate risks for recipients (e.g., implementation checklists, best practices, trainings). In addition, the Action Plan can establish the foundation for broader guidance on best practices for auditing, mitigating risk, reducing potential for errors, and monitoring unintended consequences.

Public agencies must take special care to protect recipients and avoid adverse outcomes for all Americans. AI use cases that stand to directly impact the well-being of individuals served by public agencies–such as applications of AI for determining program eligibility, detecting potential fraud, and automating processes–require more stringent oversight than other uses. Because of their potential to cause significant harm if carried out inappropriately, these use cases necessitate rigorous testing and protocols to mitigate risks. Agencies must take necessary precautions related to data privacy, security and storage. Uses of AI in human services programs must align with federal privacy regulations, such as The Health Insurance Portability and Accountability Act of 1996 (HIPAA), title 42, 42 CFR 401.713, the Privacy Act of 1974, and existing data-sharing policies.

Clear federal guidance is needed to promote the use of privacy-preserving AI techniques and to develop data sharing agreements, providing states with access to federal data to refine AI systems while ensuring stringent privacy protections. APHSA members suggest the Plan include instructions for agencies not to collect or store personal information in AI systems without explicit consent, and to take measures to protect data as it is stored and moved between systems through strong security protocols and encryption. The Plan should make clear that no private data should be included in publicly accessible training models. To support the secure and scalable use of AI, the federal government should make investments in robust data infrastructure, cybersecurity advancements, and efficient energy-powered data centers.

5. Informed Human Oversight and Expertise

AI is a promising tool to support human efforts, not a replacement for critical human thinking and oversight. Effective use of AI in human services requires deep understanding of current technology and promising design principles for re-engineering these systems. The adoption of AI as a new operational norm represents an opportunity to deploy human-centered design principles to redesign our systems based on the needs and experiences of human services customers. Customer and end-user input is key to tech-enabled, community-driven process innovation. The Plan should include instructions for agencies to work with applicants and participants to ensure AI uses are transparent and empowering, as well as implement ongoing customer feedback mechanisms to inform continuous improvements.

In order to become ready for ethical, customer-centered adoption of AI in operations, state agencies will need federal support to develop human oversight mechanisms, including:

- Train staff to ensure they can use tools correctly, efficiently, and ethically.
- Preserve participants' informed consent and right to appeal decisions made by an AI tool.
- Develop clear policies about use of AI, providing clear attribution of AI-generated content.
- Publish and follow a structured plan for addressing concerns brought by applicants and participants related to AI use.

These practices, along with others mentioned throughout this response, will be crucial in building and maintaining public trust in government and AI adoption.

6. Sustained Thriving Communities

AI applications in human services agencies should promote thriving communities built on human potential. Generative AI can enable agencies to meet the wide-ranging needs of their communities; for instance, AI-enabled systems can break down language barriers simplify expedient information sharing. Other examples of applications of AI APHSA members hope to leverage in service of their communities include, but are not limited to:

- Screen readers and audio aids for government websites and digital services;
- Braille conversion for government documents and notices;
- Real-time transcription and translation support;
- Language simplification tools to make legal and bureaucratic language more accessible;
- Virtual real-time interpretation of spoken or written sign language; and,
- Customizable communication formats such as larger text, high-contrast colors, and audio descriptions for people with various accessibility needs.

In conclusion, APHSA believes that a cohesive federal AI Action Plan—developed in collaboration with human services agencies—will enable states, counties, and cities to leverage

AI responsibly and effectively. We urge NITRD NCO and its federal partners to consider these recommendations as integral to accelerating innovation, maintaining public trust, and ensuring better outcomes for all.

APHSA stands ready to collaborate on pilot projects, convene key stakeholders, and share further insights from our members' direct experiences implementing AI in human services. We appreciate the opportunity to provide feedback on the development of an AI Action Plan and encourages agencies to reference our Artificial Intelligence resources, including our foundational tenets for AI use and our AI-Powered SNAP Modernization briefs. For questions or to discuss further, please contact Jessica Maneely, Assistant Director, Process Innovation, APHSA, at jmaneely@aphsa.org.

Sincerely,

Jess Maneely
Assistant Director, Process Innovation
American Public Human Services Association

APPENDIX

Synthesized Recommendations: Key Issues and Opportunities

These recommendations are based on APHSA's Election Transition briefs, "Courageous Imperatives for Human Services," which offer strategic recommendations to the Administration and Congress, focusing on unlocking the full potential of human services to foster a thriving nation.

1. The Administration can help human services agencies unlock the promise of advancing technology to improve program delivery by taking action to catalyze innovation and by instituting policy and planning changes that assure systems interoperability.

2. The Administration can prioritize program efficiency, quality, and customer experience of the nation's benefit programs and take action to increase policy flexibility, alignment, and innovation across programs

Technology and Process Innovation

Key Issues	Key Opportunities
State human services agency leaders navigate complicated and time-intensive requirements to gain approval from the federal government to test innovations and introduce new technologies to administer federal benefit programs.	Streamline and modernize the process and reduce the approval timeframes for the Advanced Planning Document (APD) processes, including the elimination of the "major change requirement" which would allow states to implement new technologies without seeking additional federal approval.
Merit staff requirements in SNAP require eligibility and certification functions be done by public sector "merit" employees. Not only does this requirement prevent the use of qualified contractors which could reduce costs to government, the USDA interprets this requirement as to prevent the use of AI, RPA, and other technology innovations.	Encourage innovation by simplifying the process for approving program waivers, conducting program demonstration projects (including eliminating the cost neutrality requirement), and encouraging states and local governments to test the use of new technologies.

Give states the flexibility to use non-merit staff and automation to perform necessary eligibility and certification functions in SNAP. |
| Insufficient resources are provided for states to pursue technological advancements to reduce stolen federal benefits. | Increase the administrative matching funds for states to 90% for costs associated with implementation of chip-enabled Electronic Benefit Transfer (EBT) cards for a period of 3 years. |

Modernize Program Design and Delivery Models

Key Issues	Key Opportunities
The technology landscape including the increasing prevalence of Artificial Intelligence (AI) is rapidly evolving, outpacing government policymaking capacity.	Invest in modern technologies, including AI-powered interoperable systems, to enable states to streamline processes, reduce administrative burdens, and enhance service efficiency.
State agencies face complicated and time-intensive requirements to obtain federal approval for testing policy, process, and technology innovations, and desire greater individual support for their unique programs.	Scale proven innovations by transitioning demonstration projects and waivers to permanent state options.

Work with states to explore and adopt more reliable ways to measure program integrity and payment accuracy that assess program performance and incentivize innovation. |
| Federal rules continue to require states to report on compliance-oriented measures but leave out a focus on outcome-driven metrics and hold states accountable to unrealistic measures of program integrity. | Create an Office of Technical Assistance within FNS to support state SNAP agencies on identifying and tackling root causes of error rates.

Require all federal programs to utilize inclusive engagement strategies that center the voices of communities served by human services programs and the end-users of government-built technology systems to ensure the right investments are made when programs are being designed, reformed, or modified. |
| Disjointed cost-allocation rules hinder program alignment by restricting funds to specific programs, making it difficult to support shared resources, such as staff and technology, that could efficiently serve multiple programs and their shared customers. | |
| Typical decision-making processes in technology, program, and policy design often exclude end-user experiences or community voice. | |

Align Policies and Increase Flexibility

Key Issues	Key Opportunities
Differing eligibility rules across programs, including those pertaining to income, assets, work requirements, verification, and reporting.	Streamline verification and eligibility by making consistent the disregard of subsidized income across programs such as Medicaid and SNAP, and support states to attain the best available tools across programs such as for income verification.
Limited flexibility in program design, including federal merit staff requirements, constrain service capacity.	Promote policy flexibilities that have proven effective at reducing administrative burden, such as allowing for

Current financing models impact the capacity of agencies and trigger federal requirements and therefore impact agencies' flexibility and ability to align program operations and service delivery for shared customers.

Program performance measures exclude customer satisfaction metrics, focus on reporting requirements mandated at the federal level, and are not aligned across programs.

extended certification periods for those with no earned income, allowing technology to support interviews and reporting, and streamlining eligibility across programs.

Align funding models and the reporting and cost-allocation rules associated with program funding to enable seamless service delivery for customers served under multiple federal programs.

Achieve cross-agency alignment by establishing a National Technical Assistance Center for Program Alignment and Integrity to align policies across federal programs, led by the Office of Management and Budget and guided by advisor representatives from the Department of Health and Human Services (HHS), the USDA's Food and Nutrition Service (FNS), the Department of Housing and Urban Development (HUD), and the Department of Labor (DOL).

Data Sharing and Interoperability

Key Issues	Key Opportunities
Limited data sharing or other interoperable policies and solutions exist across federally funded programs and systems, despite serving the same individual and/or family and using the same service providers.	Direct clear authority across human service and workforce development programs to share individual-level data for the purpose of program administration while respecting individual privacy and providing the necessary consent language, driving efficiency and effectiveness across health and human services programs.
Siloed system implementation that repeats common functionality (intake, eligibility, case management, provider management, financial management) and requires the same data elements to be entered multiple times for different federal programs.	Increase the federal financial participation for all systems development and maintenance to the 90/10 Medicaid rate if states meet federal requirements for interoperability.
Duplication of processes, multiple systems and protocols, and lack of federal coordination adds costs, increases risk of fraud and errors, and diminishes the client experience with government services.	For receipt of federal funding (through the ADP process), require that proposed solutions include the following: — Human-centered design principles to redesign systems based on the needs and experiences of customers; — Demonstrate how solution components/modules can be leveraged or re-used by other programs; — Require the use of interoperability technologies and standards to facilitate cross-system and thus cross-program data sharing and case management; and — Require continuous testing and monitoring of an AI-based system during deployment in operations to mitigate risks.

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