

AI accreditation pilot lessons learned report

Piloting draft ISO/IEC 42001 standard and
AI system conformity assessment scheme
2024-09-9

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Executive summary

In 2020, Canadian artificial intelligence experts in Joint Technical Committee 1, Subcommittee 42 of the International Organization for Standardization (hereafter, ISO) and the International Electrotechnical Commission (hereafter, IEC) proposed development of an international standard for artificial intelligence management systems.

After 4 years of work by hundreds of experts, the standard was published in 2024, ISO/IEC 42001 Information technology — Artificial intelligence — Management system (hereafter, AIMS).

Early in its development, the Standards Council of Canada (hereafter, SCC) noted that AIMS could have significant impact on Canadian policy and industry. Management system standards are important because they set foundational organization-level requirements that can support industry alignment, policy and regulatory objectives, as seen in Canada's forthcoming Artificial Intelligence and Data Act (hereafter, AIDA). With the quickly growing space of artificial intelligence, there was an observed need for guidance on trustworthiness, maturity and reliability of AI systems, such as tools or products. While the ISO/IEC 42001 standard addresses the requirements for AI management systems, there was also an interest in piloting requirements that apply to AI systems.

To test the application of requirements for AI systems, SCC began developing an accreditation program for conformity assessment bodies (hereafter, CABs) who would eventually provide AIMS certification. Accreditation programs ensure CABs follow clear and internationally aligned certification processes.

SCC decided to prepare the accreditation program in parallel with the development of the AIMS standard to ensure services could be available as early as possible. However, much was unknown about how the standard would impact AI users, developers and management system CABs.

To address this lack of knowledge, SCC designed a conformity assessment pilot to test a draft version of AIMS. SCC set objectives to identify a relationship between AIMS and the existing Government of Canada Algorithmic Impact Assessment tool (hereafter, AIA). The remainder of the pilot objectives related to testing AI product-level certification criteria developed by the Responsible AI Institute (hereafter, RAI Institute). The AIMS draft and the RAI Institute product certification scheme were deployed with Ernst & Young LLP Canada (hereafter, EY) in the role of CAB and ATB Financial in the role of AI organization seeking certification.

The following report explains the pilot design, objectives and learnings across the range of participants.

Objectives

The objective of the pilot was to learn how emerging AI certification requirements would impact 3 different stakeholder groups:

- CABs that assess AI products and organizations
- organizations looking to develop conformity assessment schemes for AI systems
- companies that deploy AI systems

The pilot also assessed whether Canadian federal AI policy could be supported by AI management system certification. SCC set learning objectives across the stakeholder groups:

- **Conformity assessment bodies:**
Determine whether CABs find the document sufficiently clear for repeatability (gaps identified were to be addressed in the draft standard and the SCC Requirements and Guidance (R&G) materials).
- **Scheme owners:**
In this new space, observe high-level lessons and fine tune the scheme, based on feedback from the pilot participants and CAS review.
- **AI users/developers:**
Determine how well the AI accreditation requirements prepare and support AI developers to meet new AI quality control standard requirements.

Participants

There were 3 organisations involved in the pilot, EY, RAI Institute and ATB Financial. Early involvement with key international committees (particularly the JTC1/SC42 mirror committee) was beneficial for all participants to understand context, value and provide feedback to the draft standard. Their participation made it possible to quickly leverage comments on the draft standard to apply in the pilot.

System Overview

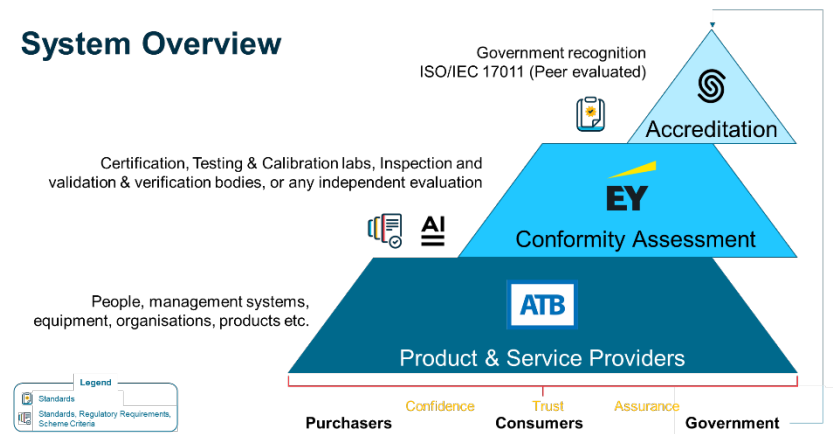


Figure 1: Accreditation System Overview

Conformity assessment body

What is a conformity assessment body

Accreditation programs include 3 stakeholders. SCC is the accreditation body that assesses the competence of conformity assessment bodies. In turn, CABs provide certification services to industry (e.g., AI developers) against a standard (e.g., ISO/IEC 42001 AIMS). Certification is an audit of whether an organization, product or person conforms to the criteria laid out in the standard or scheme. CABs include certification bodies, inspection bodies, laboratories, verification/validation bodies and proficiency testing providers.

Conformity assessment body role

The EY team have experience conducting audits and assessments for compliance with business and technical standards for over 25 years. The lead assessor has prior experience in providing feedback on the development of the ISO greenhouse gases standards, as well as standards development by other international bodies including International Auditing and Assurance Standards Board (IAASB), Institute of Electrical and Electronics Engineers (hereafter, IEEE), RAI Institute and Chartered Professional Accountants of Canada (hereafter, CPA Canada). In addition, they have participated in the technical committees for other relevant standards developed by the Digital Governance Standards Institute, including CAN/CIOSC: 101 Ethical Design and Use of Automated Decisions Systems.

EY played a key role in the standardization process by leveraging the AIMS draft standard to conduct a pilot conformity assessment and gap analysis of ATB Financial's AI management system.

Scheme owner

What is a scheme owner

A scheme owner is an organization that leverages standards and requirements documentation to develop a scheme, which is a set of requirements for conformance in a certain scope. These requirements can include specific product technical requirements, best practices and other input conformance needs. The scheme owner is then responsible for maintaining the scheme (e.g., updating when requirements change).

Scheme owner role

RAI Institute participated as the scheme owner of an AI system conformity assessment scheme in the pilot. With experience focused on scheme development, their role as the assessor for the pilot was helpful to identify potential issues assessors might encounter when using the conformity assessment scheme.

The draft RAI Institute conformity assessment scheme (CAS) for AI systems incorporates requirements from the Organisation for Economic Co-operation and Development (OECD), IEEE, United Nations Educational, Scientific and Cultural Organization (UNESCO), ISO and other agreed-upon principles and standards. The CAS assessment framework comprises 2 different conformity aspects: organizational

maturity and AI system requirements. Embedded in each aspect are the core metrics for fairness, accountability, consumer protection, robustness, system operations, explainability and interpretability.

AI user/developer

What is an AI user/developer

An AI user/developer is an organization that uses products that are fully, or in part, artificial intelligence and/or have developed their own AI tool for delivering their work. Systems that have embedded AI functionality are applicable to this category.

AI user/developer role

ATB Financial was the organization assessed against the draft ISO/IEC 42001 requirements. As a financial institution, the organization and team have experience complying with Alberta Superintendent of Financial Institutions (ASFI) and Office of the Superintendent of Financial Institutions (OSFI) requirements. Furthermore, the assessment team included members who have worked with internal audit and external audit, i.e., Office of the Auditor General (OAG) and regulators from Office of the Comptroller of the Currency (OCC).

Throughout the pilot, ATB Financial had 2 roles: to undergo assessment based on the draft ISO/IEC 42001 requirements and to undergo assessment against the RAI Institute conformity assessment scheme for AI systems. The position of participating in both management system and product level assessments enabled ATB Financial to provide feedback on potential alignment, integration and conflict for the requirements and future organizations in similar positions.

Process

This pilot consisted of 2 separate assessments of ATB Financial:

- the assessment of the organization based on the draft AIMS standards
- the assessment of an AI system used based on RAI Institute's AI System CAS

The combination of an organization level assessment and system level was selected to address the growing interest/concern in the market of trustworthiness, reliability and overall management of AI. This approach is akin to medical devices, where the assurance of use is linked to both the organization's management systems and the product itself.

Draft AIMS assessment

In the assessment based on the draft of AIMS, the objective was to measure the effect of AIMS on the AI user/developer. This was measured using pre-post experiment.

First, ATB Financial completed assessment against the TBS AIA tool. The AIA provided an overall "impact score" based on a combination of the intended use, risks and mitigations of an algorithm.

Next, incorporating both the draft AIMS standard and leading industry practices, EY translated the AIMS conformity requirements into specific control activities and supporting artifacts, which formed the basis of the pilot conformity assessment of ATB Financial's AI management system, mapping existing practices against the standard to identify areas of alignment and divergence, which enabled ATB to enhance their AI governance, improve risk management practices and align with emerging global standards.

Finally, ATB Financial completed conformity assessment using the draft AIMS standard and repeated the AIA impact scoring. Changes in the AIA score pre- and post- AIMS conformity were compared. This part of the pilot demonstrated a potential link between AIMS certification and an improved ability to identify and mitigate AI risks.

Detailed results are discussed in the Centre for Regulatory Innovation Regulatory Experimentation Expense Fund Final Report, *Piloting an Accreditation Program for the Assessment of Artificial Intelligence Management Systems*, available upon request.

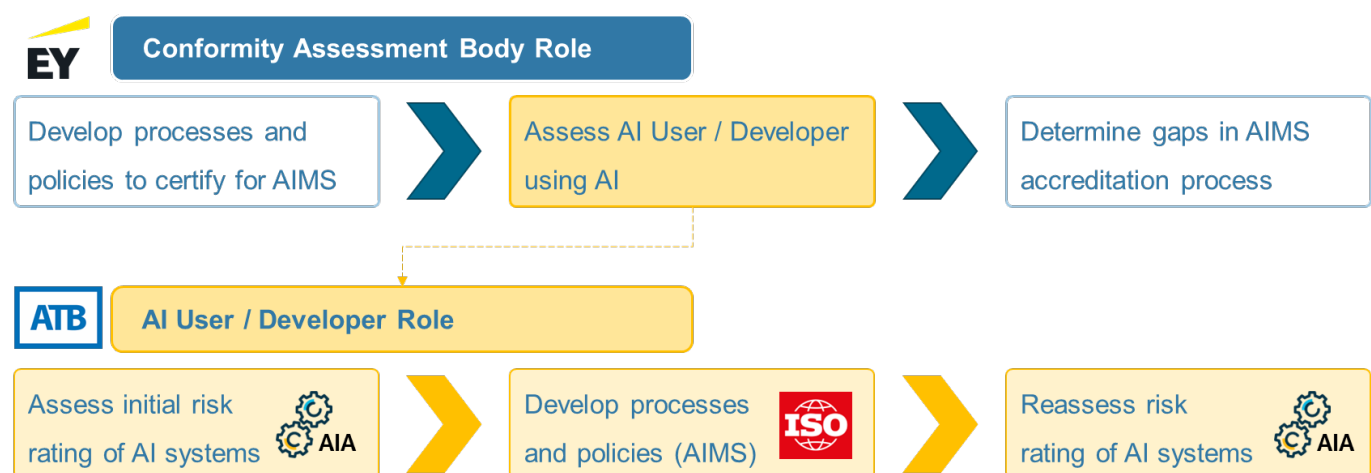


Figure 2: Process flow for draft AIMS Assessment

AI system conformity assessment scheme assessment

ATB Financial selected a recommender system. The recommender system was selected because it has direct customer impact and is prone to have ethical and reputational risks. This system necessitates a robust model governance framework to ensure responsible and effective development and deployment.

RAI Institute has a conformity assessment scheme specifically for measuring the maturity, reliability and trustworthiness of AI systems. Those requirements were used for this assessment.

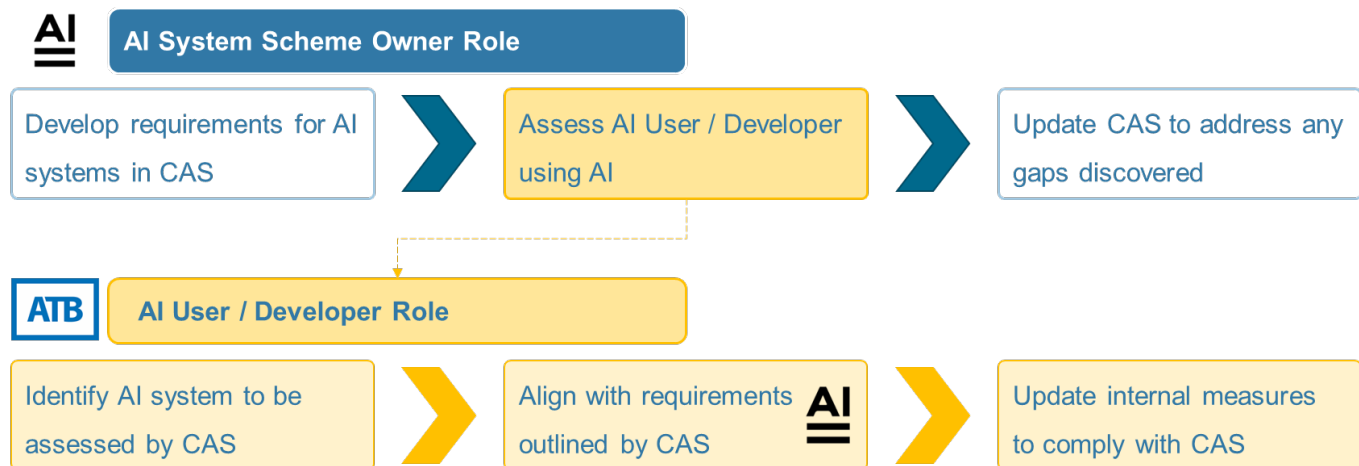


Figure 3: Process flow for AI Product system CAS Assessment

Observations

Overall lessons learned

This pilot was a success because it generated many useful lessons for all participants, including SCC. The novelty of the experimental approach captured international attention and supported Canada's contribution to ISO/IEC and the UNECE, where there is now interest in how Canada is preparing for AIMS implementation.

Moreover, the experiment showed a possible model for future experimentation with certification and accreditation schemes. The model involves first identifying an existing quality or performance measure that can be used as a "benchmarking" tool. Then a newly published or draft standard, which is being considered for Canada, can be piloted to see if performance or quality changes are observed, as measured by the "benchmark" tool. This pre-post experimental approach may become a valuable tool for piloting standards in the future.

Participants in the experiment, both the company seeking AIMS and AI system conformity (ATB Financial) and the company assessing conformity (EY and RAI Institute), reported that the experiment raised their awareness of AIMS and other AI standards tools. They appreciated the opportunity to participate in a forward-looking policy evaluation process. They gained insight into both certification and accreditation, which will serve them well in other areas.

There were also challenges identified by participants. At the outset it was not well understood that the participants would have to work with the draft AIMS standard. Once AIMS publication was delayed, SCC decided that the experiment participants would continue to work with a draft version. In order to view the draft, participants had to be added to the Canadian mirror committee to JTC 1/SC 42. This resulted in project delays and some challenges for participants. A final set of risks emerged from the fact that participants were working hard to comply with draft requirements that were subject to change at a later date. Participants were concerned about working to meet criteria that would later change. This was

mitigated by giving participants visibility into draft updates and by ensuring their feedback was shared through the mirror committee.

The project required knowledge of standards, conformity assessment and the international standards development process at ISO/IEC. SCC dedicated significant resources to project management, advising participants and communicating the process and outcomes to stakeholders.

Conformity assessment bodies

Revisiting the objectives set:

- determine whether CABs find the document sufficiently clear for repeatability (gaps identified were to be addressed in the draft standard and the SCC Requirements and Guidance (R&G) materials)

During the pilot, there were some key themes of lessons learned:

- feedback on ISO/IEC 42001 draft standard
- challenging compliance areas
- organizational challenges and mitigation

The following sections outline the learnings with EY.

Feedback on ISO/IEC 42001 draft standard

Terms & definitions

An overarching area of confusion surrounded interpretation of language. Words such as “organization” or “bias” led to discussion on how these were defined, their scope of applicability and how it implicated conformance.

Through discussions with the Canadian mirror committee, this feedback was shared with the international technical committee. Unfortunately, the feedback could not be incorporated into ISO/IEC 42001, however, the development of supporting ISO/IEC standards (e.g., ISO/IEC 22989 Information technology — Artificial intelligence — Artificial intelligence concepts and terminology), focused training efforts and ongoing international alignment will help with understanding.

Rate of change

As AI is a technology that is in a state of evolution, it was not clear how conformance to all aspects of the AI management system could be achieved. For example, an organization may have a good AI management system over classical AI systems but initially be less mature for generative AI.

How this discrepancy in maturity would be considered when determining both initial conformance assessment and ongoing evaluations will be incorporated into additional guidance on ISO/IEC 42001.

Additional requirements

Initially, a questionnaire was prepared using the Controls and Control Objectives from AIMS’s Annex A and the illustrative guidance in Annex B from the draft ISO/IEC 42001 standard. EY built upon the guidance to clarify requirements for ATB Financial (i.e., an inventory management system).

To assist organizations in determining the expectations for each control (i.e., AI inventory management system), CABs may need to build upon the interpretative guidance in AIMS Annex B to provide greater specificity on the nature of the documentation evidence required to demonstrate each control.

Challenging compliance areas

The most significant challenge for both ATB Financial and EY in the pilot assessment was determining the completeness of the AI models known and managed under the AI management system. It was acknowledged that due to the many ways in which an AI system could be used by mid- to large- sized organizations it is difficult to ensure that all models are known and inventoried, particularly those in non-traditional groups using analytics and machine learning, open-source applications, vendor-supplied models and AI embedded in traditional technologies (e.g., enterprise resource planning [ERP] systems).

Compliance to a requirement can be achieved differently between organizations. SCC and CABs can share guidance on the expectations and/or approaches that will address the requirement.

Organizational challenges and mitigation

Accounting firms must comply with their local professional code of conduct which may impede a CAB's ability to conduct an ISO conformance assessment.

As there could be differences between ISO/IEC conformance and local CPA requirements (i.e., Ontario), professional designation authorities and standards organizations can ensure interoperability, or at least minimal conflicts, for interacting with standards or conformity assessment.

AI scheme owners

Revisiting the objectives set:

- in this new space, observe high-level lessons and fine tune the scheme, based on feedback from the pilot participants and CAS review

During the pilot, there were some key themes of lessons learned:

- feedback on AI system CAS requirements
- challenging areas to assess compliance against
- organizational challenges

The following sections outline the learnings with RAI Institute.

Feedback on AI system conformity assessment system requirements

From the original CAS, around 5 questions were removed or changed out of approximately 100. Testing requirements prior to full implementation of a CAS helped fine tune the approach.

RAI Institute was not able to “coach” either the organization developing the system being assessed (ATB Financial) or the testing and evaluation partner (Fairly AI). Maintaining the integrity of the pilot roles yielded a more realistic microcosm for testing new tools. This approach benefits from SCC's coordination and guidance to maintain momentum.

Challenging compliance areas

Given the range of AI systems, it is important to be flexible enough to apply only certain controls and clarify what appropriate ranges might be for performance metrics. This required a bit of calibration to the scheme.

Identification of compliance metrics for requirements is unique to navigate within AI applications. Clear guidance on identifying the “object of conformity” will be valuable. This is currently underway through review of ISO/IEC 17067 Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes.

Organizational challenges and mitigation

RAI Institute had a testing and evaluation partner but not a formal auditor. Therefore, the knowledge of the RAI Institute team and advisors were critical. Next time, trained assessors can improve the assessment process, even in the new and developing area of AI.

AI users/developers

Revisiting the objectives set:

- determine how well the AI accreditation requirements prepare and support AI developers to meet new AI quality control standard requirements

During the pilot, there were some key themes of lessons learned:

- feedback on ISO/IEC 42001 draft standard
- feedback on RAI Institute AI System CAS
- challenging compliance areas
- organizational challenges
- interoperability between AIMS and AI System conformity assessment scheme

The following sections outline the learnings with ATB Financial.

Feedback on ISO/IEC 42001 draft standard

Third-party risks

Alignment with organizational policies and third-party risks were challenging to assess. For mid-to-large size companies, the scope of relevant parties is bigger than the scope of AI governance. It may be hard to understand all areas and give a good overview of their policies and update them in a practical way.

Third-party risk involves third parties which are not always within the control of companies. Companies usually need to reach a mutual agreement with vendors that may not be in favour of the controls in AIMS.

The scope of third-party risk needs further investigation within the span of AI, which has been noted by the Canadian mirror committee and others.

Optionality of requirements

It was sometimes unclear if all evidence listed was required to demonstrate compliance. It will be helpful if the implementation guidance expands on if the requirements are “required” or “optional”.

Feedback on RAI Institute AI system conformity assessment system

Some of the requirements didn't apply to the AI recommender system use case. Since this use case is identified as a "low-risk, low agency AI system", the required scores are adjusted based on it.

Understanding the risk level of the AI tool can help align appropriate mitigation strategies. During an assessment, clarity ensures the correct level of mitigation exists to be compliant with the CAS.

Compliance challenges

AIMS

The draft AIMS standard avoids specific guidance on management processes. However, the requirements may be challenging to level set and cause confusion.

Organizations may need to consider evergreen or recurring controls to maintain compliance for enterprise-wide tools to sustain compliance (e.g., AIMS section B.6.2.6 AI system operation and monitoring).

AI system CAS

An organization can explore what information is adequate for the operators/end users in different use cases of the AI tool. Appropriate scoping of training responsibility is also important (e.g., who is responsible for training the supply chain on the use and outcomes of the AI tool?).

Organizational challenges and mitigation

Organization-wide requirements

Many of the controls span across multiple teams, requiring broad communication and support from those teams. It may take a lot of effort to understand the requirements and the other referred standards and requirements. These teams need to understand the importance of the work to be able to help.

Training

High level training on management system standards, multi-disciplinary AI governance working committees and access to support can aid in understanding compliance needs.

Resources

From a project level, the biggest challenge was resource allocated vs. the completeness of the project. Given enough time, ATB Financial can provide training to all the roles related to the project and provide handbooks. However, with competing priorities, this can be a challenge. More guidance on the best practices of providing information for different roles in the organization would be helpful.

Interoperability of AIMS and AI System CAS

Requirement integration/efficiencies

It can be difficult to differentiate the requirements for organizational level assessment (i.e. the ISO/IEC 42001) and product-level assessment (i.e. the CAS).

It is beneficial to have clear support from a trained assessor on both the AIMS and CAS side. Also, some efficiencies can be made to comply with multiple requirements.

Vendor model implications

Even with the Model Risk Management policies for vendors, it's hard to ensure that suppliers commit to a responsible approach to the development of AI systems. More clarity on the supply chain requirements for AI management systems would be helpful.

Conclusions

Through this comprehensive pilot of the draft ISO/IEC 42001 standard and RAI Institute's AI system CAS, all participants experienced, learned and improved their understanding of standardization. Experimentally, the AIA tool allowed a metric for monitoring an organization's risk score when implementing compliance controls for AIMS. Based on the AIA results, it was noted that the pilot helped ATB Financial understand and manage AI impact. There was an improved understanding of the different pieces on governance at ATB Financial and an overall improvement of ATB Financial's risk mitigation score (i.e., their AIA risk mitigation score went up). For the CAB, EY was able to determine sector specific controls that would help guide ATB towards compliance. For the SO, the CAS was fine-tuned to account for sector specific requirements, as well as create efficiencies with the AIMS standard.

Further, the experience in the financial space served as a strong foundation. Through the pilot, participants also helped illuminate areas of confusion that may overlap with other sectors. Even with mature existing assessment frameworks, it can take mid- to large- sized companies' significant effort to review their existing artifacts and prove compliance. The pilot showed that AIMS certification may provide small to medium size AI organizations with a helpful baseline understanding of AI governance, which could lead to easier conformity with other existing or emerging AI certification frameworks. This pilot also reinforced the need for testing AIMS across different sectors and with enterprises of differing size and maturity. Finally, it highlighted the value of having a holistic approach to testing AI from both an organization level and AI system level to increase overall trustworthiness.

Accreditation bodies

Sector implications

The rapid speed of any technology demands more guidance to ensure quality, trustworthiness and reliability. With the nature of AI indicating constant change and growth, this sector calls for a novel approach to standardization and conformity assessment. In this pilot, other complex sectors (i.e., medical devices, cyber security, etc.) were leveraged to serve as a framework for conformance. This helped ground the steps of implementation in fundamental processes. However, the object of conformity continues to be complex, as the "AI" may change. This directly impacts the AI system CAS and indirectly the AIMS conformance as significant changes must be monitored for the system.

Furthermore, expertise in the AI and conformity assessment realm proves valuable in the future of accreditation. To ensure the AI system itself performs correctly (AI system) and that all AI systems are monitored, reviewed and adjusted (AI management system), a holistic and thorough understanding is needed.

Improved ecosystem value

With AI shaping many aspects of our life, this work has led to exceptional interdisciplinary teaming. Many economies have created initiatives, forums and international collaborations to share lessons and expertise. These may have differences in implementation; however, interoperability is a key aspect of many international forums. SCC is actively involved, with many leadership positions, in the Asia Pacific Accreditation Cooperation (APAC), International Accreditation Forum (IAF) and International Laboratory Accreditation Cooperation (ILAC). With an open exchange of information and approaches, the AI ecosystem aims to continue to grow in an integrated way.

Conformity assessment bodies

Sector implications

The EY team was able to determine sector specific controls that would help guide ATB towards compliance. Further, their experience in the financial space served as a strong foundation. Through the pilot, their experience in other sectors also helped illuminate areas of confusion that may overlap with other sectors. In a “normal” setting, the CAB role will be limited to assessment of conformity rather than assistance in achieving it. This highlights an opportunity for guidance to various sectors on how the conformance can be met for each use case.

Improved ecosystem value

Even with mature existing assessment frameworks, it can take mid- to large- sized companies’ significant effort to review their existing artifacts and prove compliance. The role of an experienced CAB in both AI and conformity assessment proves a valuable combination. For organizations looking to enter this space, awareness of other management system standards helps increase understanding and rationale behind the AIMS contents and requirements.

Scheme owners

Sector implications

Sector implications are significant, because in a highly regulated industry (financial services), the sector provides clear responsible AI guidance. The CAS is easy to implement for other sectors because there is a rich body of regulatory guidance, soft law and definitions in other sectors that the scheme pulls from.

Knowledge of sector implications of where the AI system is being used is important for understanding existing conformity obligations, minimizing competing requirements and improving efficiencies, where possible.

Improved ecosystem value

The RAI Institute CAS is a detailed conformity assessment tool for AI systems, an area that currently lacks international standards or guidance. The pilot offered an environment to ensure the interpretation of each requirement was understood while being assessed. It also provided communication channels to provide feedback and explore the implications. With this approach, ATB Financial was able to leverage existing

policies and create more specific materials to align with the CAS requirements. All participants identified this experience as driving value within their understanding of standards and conformity assessment. Further, the pilot has improved the RAI Institute's ability to develop a CAS and assess complex AI tools. It improved ATB Financial's ability to comply with AI system requirements. More work will be done to ensure the lessons learned in this pilot apply to other AI systems, sectors and organizations at various levels of maturity.

AI users/developers

Sector implications

ATB Financial, as a financial institution, has a typical governance structure which is 3 lines of defense. Model Risk Management is an important layer of independent model review and practices have been maturely established. At ATB Financial, the governance process is constantly improving. Other sectors may have different governance structures and scrutiny may be different. Other sectors may also have sector specific focuses (e.g., the healthcare industry, the explainability of the AI system will receive more audits than financial institutions' low risk low agency AI systems).

It is very important to understand the existing requirements of the organization's sector. Within that area, the risk level of the AI tool may differ between applications. Mitigation and compliance strategies should align with the associated risk level and sector requirements accordingly.

Improved organizational performance

Through leveraging the AIA tool and seeing the positive results from this activity, the AI Impact Assessment has been added as a required practice and seeing it as part of the ISO requirements. It is positive reinforcement of the importance of the impact assessment and will help with the adoption.

Also, the pilot identified some existing processes (e.g., anytime feedback) that can be used to capture AI related concerns.

Next steps

Accredited CABs have increased credibility when providing certification services. Governments often rely on accreditation to recognize CABs to perform certification within Canadian regulatory frameworks. Similarly, industry relies on accreditation of CABs to select high-value certification services.

SCC recognized the importance of putting this trust infrastructure around AIMS to support the use of the standard by governments and industry. Standards-compliant products enhance supply chain security and transparency, providing consumers with clarity about product contents and origins, thereby influencing adoption and purchase decisions. Additionally, standards promote interoperability and scalability, enabling technologies to work seamlessly together and allowing firms to access global markets more efficiently.

The key findings of this AI accreditation pilot will be socialized with interested parties, including national and international stakeholders. This initiative shows a novel approach to testing the impacts of a draft standard in an emerging sector. Exploring how the requirements can impact the accreditation and certification ecosystem was completed, yet more research must be done to ensure a holistic overview and sector specific needs are met.

The comments from participants were shared with SCC and the Canadian mirror committee, which has led to discussions on national and international guidance documents for AIMS. Also, SCC will continue this momentum by building a full AIMS accreditation program, complete with assessor training and CAB onboarding.

Pilot participant primary contributors

The following individuals played a critical role in the success of this Artificial Intelligence Accreditation Pilot. The collaboration and lessons from this experience are due to their contributions, expertise and approach to this new, growing, space.

ATB Financial

Dongmei Wang Managing Director, Model Risk Management

Yukun Zhang Director, AI Governance and Responsible AI

Ernst & Young LLP Canada

Cathy Cobey Partner, Global Responsible AI Co-Lead

Yvonne Zhu Partner, Canadian Responsible AI Leader

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