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AI Design: A Responsible AI Framework for Pre-filling Impact Assessment Reports

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Abstract—Impact assessment reports for high-risk AI systems will be legally required but challenging to complete, especially for smaller companies. That is because the current process is complex, costly, and relies on guidebooks with limited assistance. We propose *AI Design*, a semi-automatic framework for pre-filling these reports. It consists of two components: (A) *StakeLinker*, an interactive tool combining various stakeholders' perspectives; and (B) *FillGen*, an LLM-based tool processing stakeholders' perspectives and producing the report to be reviewed by regulatory experts within a company. We conducted two user studies: the first with 13 AI practitioners who confirmed *StakeLinker's* effectiveness in gathering comprehensive input for impact assessment; the second with 8 additional practitioners who successfully evaluated a report for a crime analysis system pre-filled by *FillGen*. To show generalizability, we also made the reports for two other AI systems publicly available.

implications, 0.9.5 Public policy.

Index Terms: K.4.1.c Ethics, K.4.1.d Human safety, I.2 Artificial Intelligence, I.6.5 Model Development, I.6.4 Model Validation and Analysis, O.9.3 Moral implications, O.9.4 Legal

■ INTRODUCTION

As AI governance evolves [20], impact assessment reports will become legally required. The



Figure 1: *AI Design* is a framework that guides stakeholders in pre-filling impact assessment reports. Its first component, *StakeLinker* (A), solicits input from multiple stakeholders on various aspects of the AI system, using 32 statements grounded in literature. This input is subsequently fed into *FillGen* (B), an LLM-powered tool. *FillGen* is responsible for summarizing stakeholders' input and producing new insights about the system. Its *SysInfoGen* processes the first 27 statements to generate information about the system's use, while *RiskGen* assesses associated risks, *BenefitGen* identifies potential benefits, and *MitigationGen* suggests mitigations. This content is subsequently used to pre-fill an *impact assessment report* (C). The stakeholders review the pre-filled report, and present it to regulatory experts for final approval.

EU AI Act¹ mandates reports on the impact of high-risk AI systems to enhance transparency on their functionalities and hold companies accountable for ethical and societal impacts. This requirement is really important because, as of now, there have been over 600 actual AI incidents² (like an app that made everyone's photos look whiter, and an Amazon feature that was not fair to books by minority authors) and more than 10,000 possible hazards with AI have been cataloged.³ This shows why we need to carefully check the impact of AI before using it [1] [9].

However, completing impact assessment reports is challenging, especially for smaller companies struggling to keep up with evolving AI regulations.⁴ These struggles arise from two factors. First, the assessment process is complicated and expensive. It is complicated because it needs input from different people like developers and lawyers. It is expensive so much so that the certification process will increase development costs by 10-14%⁵, adding up to €400 thousand, which is hard for small companies to afford. Second,

existing guidebooks that help stakeholders fill in these reports lack practicality as they contain various guiding formats (e.g., FAQs, brainstorming prompts) that might not be relevant to all stakeholders or applicable to a variety of AI uses. Seeing these difficulties, the EU has asked for new tools to help with AI risk assessment¹.

We propose AI $Design^6$, a semi-automatic framework for pre-filling impact assessment reports (Figure 1). It consists of two components: StakeLinker, an interactive tool for gathering stakeholders' input about an AI system's use and organizing it for large language model (LLM) processing; and FillGen, an LLM-based tool for producing the impact assessment report using StakeLinker's inputs. Unlike current solutions that are not designed to work for all AI applications [18] or only cover parts of the assessment [3], StakeLinker uses a five-part format that works for any AI application, and FillGen handles the entire process of impact assessments, including the identification of risks, mitigations, and benefits. We used AI Design to pre-fill a report for an AI system identifying crime hotspots from CCTV footage, demonstrating its potential to simplify impact assessment and reduce compliance burdens. To show its generalizability, we also provided reports for a vocational training

¹https://artificialintelligenceact.eu

²https://incidentdatabase.ai

³https://oecd.ai/en/incidents

⁴https://www.digitalsme.eu/the-ai-act-help-or-hindrance-for-s mes

⁵https://www.isaca.org/resources/isaca-journal/issues/2023/v olume-2/the-potential-impact-of-the-european-commissions-pro posed-ai-act-on-smes

⁶Project's website: https://social-dynamics.net/ai-design

chatbot and a system assessing damages after natural disasters.

RELATED WORK

Until recently, there was no consensus on the content of impact assessment reports [16]. Scholars have agreed on the need for three sections (AI system use, risks, and mitigation strategies), and these sections are reflected in four newly proposed templates that we discuss next.

Sherman and Eisenberg introduced the "standardized risk profile" [15], comprised of the system's information, risks, mitigation strategies, formal evaluations, and impact summaries. Similarly, Microsoft's report includes system information, risks, mitigation strategies; and an Algorithmic Impact Assessment from the Ada Lovelace Institute⁷ for AI applications in healthcare and NIST's Algorithmic Impact Assessment⁸ also cover these aspects, with NIST adding details on system tasks, operational contexts, and organizational risks. However, these reports tend to prioritize risks over benefits. A balanced consideration, though, provides a well-informed perspective, contextualizes risks, and helps prioritize mitigation strategies. Therefore, AI Design includes not only system use, risks, and mitigation strategies but also benefits.

A number of guidebooks have been developed to facilitate the completion of these reports. NIST provides comprehensive lists of actions, documents, and glossaries9, while Microsoft and Ada Lovelace Institute offer group exercises and question prompts. CredoAI provides examples of populated templates but lacks specific guidelines on recreating them [15]. All these works have partly tackled the same problem: when developers start with a blank template and guide, they often experience writer's block because they have to fill in all the content and ensure it meets current regulations. To help with this, earlier work suggested using AI to initially pre-fill in these reports by listing AI users and subjects and providing the necessary legal information [3] [4] [5] [7] [10].

AI DESIGN

AI Design is a framework for guiding stakeholders to populate impact assessment reports. Next, we describe its two components— *Stake-Linker* and *FillGen*—and how they produce the *impact assessment report*.

A. StakeLinker

This is an interactive tool that facilitates the gathering of input from multiple stakeholders regarding the AI system for which the impact assessment report has to be written. We developed this tool in two steps.

Step 1. Curating a set of statements. To gather stakeholders' information about the AI system's use, we curated 32 statements by reviewing four papers on Responsible AI (RAI) guidelines, questionnaires, and checklists [6] [8] [11] [12], borrowing mostly from [6]. These statements (available on the project's website⁶) systematically collect information about the system's use (statements 1-6), components, evaluation, and data (statements 7-25), involved teams (statements 26–27), risks and mitigations (statements 28–30), and benefits (statements 31-32). For example, one statement asks to identify individuals interacting with the system [6] [12], while another asks to report performance metrics across demographic groups [6] [11] [12].

Step 2. Placing the statements in a newly created UI. To design the interface integrating the 32 statements, we conducted a user study with 13 AI practitioners (2 females, 11 males, median age 39), approved by our institution. Participants work at a large tech company and had 2-10 years of experience in data visualization, data science, machine learning (ML), and natural language processing (NLP).

During the study, participants interacted with two prototype interfaces commonly used in RAI tools: a scroll-page checklist, and a one-page card stack [6] [11]. The checklist presents each statement with a checkbox and an input box (Figure 2A) for users to tick when the statement is implemented and write the implementation details. The stack shows each statement on a twosided card (Figure 2B), allowing users to mark it as (to be) implemented and note implementation details on the back.

⁷https://www.adalovelaceinstitute.org/resource/aia-template

⁸https://www.equalai.org/aia

⁹https://airc.nist.gov/AI_RMF_Knowledge_Base



Figure 2: Two preliminary prototypes of *StakeLinker*'s user interface: (A) a scroll-page checklist, and (B) a one-page card stack.

We evaluated the two prototypes through participant ratings using the System Usability Scale 0-100 (0: unusable; 100: highly usable) [2], followed by a semi-structured interview where we asked about the relevance of the 32 statements and the preferences for the prototypes.

The statements were generally well-received, with most participants (12 out of 13) being able to comprehensively describe their AI systems' use. However, one participant found it more challenging, likely due to less experience in AI development. Despite that, the statements were considered accurate and applicable to a variety of AI uses. Participants rated the usability of the card stack prototype higher than the checklist (checklist: $\mu = 44.11$, $\sigma = 21.16$, while cards: $\mu = 66.43$, $\sigma = 16.01$). Therefore, for our final integration, the card-based interface was chosen.

By then analyzing the interviews' transcripts, we identified four design requirements used to revise our initial card-based interface (Figure 3). These requirements address *Role and Phasebased Selection* (R1), *Adequate Reading Time* (R2), *Skip Functionality* (R3), and *Input Sharing for Future Reviews* (R4).

To meet R1, we categorized statements by stakeholder roles (designers, engineers or researchers, managers or executives) [6] [11] and AI system phases (development, deployment, use) [12], and made sure the interface adjusts the number of relevant statements that are presented based on the selected role and phase. For R2, we presented statements as two-sided cards to ensure adequate reading time. For R3, we included a skip button for irrelevant statements and a progress tracker. Finally, to meet R4, we developed a summary page that compiles stakeholders' answers into downloadable PDF and JSON formats for easy sharing and review.

B. FillGen

This LLM-powered tool processes the previous stakeholders' input to pre-fill the impact assessment report. It does so by running four prompts in OpenAI's GPT-4¹⁰. We chose version 4 for its capability of interpreting legal documents and, more generally, for its top performance as of March 2024¹¹. The four prompts are:

(1) SysInfoGen. The first prompt summarizes the input of the stakeholders (statements 1-27) to generate the description of the system's use in a five-component format suitable for risk assessment as per the EU AI Act [8]. The prompt has three parts: role, instructions, and output format. To begin with, the model is asked to take the role of a "Senior AI Technology Specialist" guiding it to generate a specific type of content. The instructions indicate, upon the stakeholders' input, to articulate the system's use into these five components. The first component is Domain. This specifies the industry or sector, like law enforcement. Purpose explains the goal, such as identifying potential crime hotspots. Capability describes the technology behind it, like object and action recognition. AI user is the one using the system, like the police force or security agencies.

¹⁰https://cdn.openai.com/papers/gpt-4.pdf

¹¹https://arena.lmsys.org



Figure 3: *StakeLinker's* final user interface is a one-page card stack. The interface meets four design requirements: (R1) adjusting the number of relevant statements based on the selected role and phase; (R2) presenting each statement as a card to provide adequate reading time; (R3) allowing to skip irrelevant statements and track the progress; and (R4) enabling sharing input for future reviews.

AI subject is the one affected by the system, such as people in public spaces. Then, the output format specifies that the description of the system's use in output (e.g., "crime hotspot analysis using CCTV") should be returned in the format [Domain, Purpose, Capability, AI user, AI subject] as, say, ["Law enforcement", "Identifying potential crime hotspots", "Object and action recognition", "Police departments, Security agencies", "People in public spaces"]. Finally, the output is put in the System Information section of the impact assessment report (Figure 4A), and propagated to the next prompt.

(2) *RiskGen.* The second prompt summarizes what the different stakeholders think about the risks of the system (statement 28) and finds more risks using guidelines from the EU AI

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Figure 4: Impact assessment report for an AI system identifying crime hotspots from CCTV footage. The report consists of four sections describing the system's: (A) use in the five-component format and information about system components, evaluation, data, and development teams; (B) risks; (C) mitigation strategies; and (D) benefits. Risks, mitigation strategies, and benefits are categorized in three layers: risks related to (model) capability, human interactions, and systemic impact [19]. Text with a light blue background and a star icon indicates new content generated by *FillGen* (30% of the report's content), and text without background indicates content provided by the stakeholders and summarized by *FillGen*.

Act, Human Rights (HRs),¹² and Sustainable Development Goals (SDGs)¹³. We chose these three documents because they match well with a DeepMind's framework that looks at three main areas [19]: the system's technical parts (called 'system's capability risks' in the framework), how people interact with it (human interaction risks), and its impact on society, the economy, and the environment (systemic risks). The EU AI Act focuses on the technical parts, Human Rights focus on how people interact with the system, and the Sustainable Development Goals look at its long-term impact on the world. RiskGen's prompt has four parts: role, input, instructions, and output format. The role is a "Senior AI Technology Expert, specializing in compliance with the EU AI Act, SDGs, and HRs". The input includes parts of the EU AI Act about highrisk AI, the definitions of the 17 SDGs from the Sustainable Development Agenda, and the 30 articles from the UN Universal Declaration of Human Rights. The instructions involve using a step-by-step reasoning method (Chain-of-Thought) by breaking down the task into five smaller steps: 1) summarizing the risks identified by others; 2) writing a short description of how the system is used; 3) classifying the risk level of the system's use as either unacceptable, highrisk, or safe; 4) finding any extra risks that affect the SDGs or HRs because of how the system is used; and 5) organizing all the risks based on their importance to the system's technical parts, how people interact with it, and its impact on society. Finally, the output is then used to help fill out the Risk section of the impact assessment report (Figure 4B), and is also used in the fourth prompt called MitigationGen.

(3) BenefitGen. This third prompt gathers what the stakeholders think about the benefits of using the system (statements 31–32) and finds even more benefits. It works with four parts: role, input, instructions, and output format. The role is a "Senior AI Technology Expert, specializing in SDGs and HRs". The input includes the definitions of the 17 SDGs and the 30 articles from the UN Universal Declaration of Human

13https://sdgs.un.org/2030agenda

Rights. The instructions again specify a Chainof-Thought. Finally, the output is then used to help fill out the Benefits section of the impact assessment report (Figure 4D).

(4) MitigationGen. The fourth and last prompt gathers mitigation strategies from the stakeholders about how to reduce the risks of the system (statements 29–30) and suggests extra ways to lessen these risks, which were previously identified by *RiskGen*. It has three parts: role, instructions, and output format. The role is a "Senior AI Technology Expert, specializing in compliance with the EU AI Act, SDGs, and HRs". The instructions guide the model to arrange the strategies in a proper output format. This output is then used to pre-fill the Mitigations section of the impact assessment report (Figure 4C).

Before we used *FillGen* to make a full impact assessment report, we tested its four different prompts. The SysInfoGen prompt worked well because it turned input text into a standard format. However, RiskGen and BenefitGen sometimes repeated things they should not because they often referred to SDGs (Sustainable Development Goals) and Human Rights, and some of these overlap. For example, SDG 10, which is about reducing inequalities, and HR Article 2, which is about freedom from discrimination, ended up giving similar results. MitigationGen sometimes made up solutions or gave unclear ones. To solve these problems, we made some improvements to the prompts by: 1) having the model combine similar risks and benefits; 2) telling it not to suggest solutions if it was not sure; and 3) giving it examples of good-quality outputs for risks and benefits to learn from (few-shot learning).

Evaluating FillGen based on an impact assessment report.

To determine whether our framework works, *FillGen* was used to pre-fill a report for a hypothetical AI system that identifies crime hotspots from CCTV footage. *FillGen* summarized input from a developer and designer at our company who have experience with similar systems, and it also listed new risks, ways to fix them, and benefits. This AI system was deemed high-risk because it may indicate potential criminal activities in public places (Figure 4A), and it could invade

¹²https://www.un.org/en/about-us/universal-declaration-of-h uman-rights

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privacy or increase racial inequalities (Figure 4B). However, these risks can be reduced if the system is trained with anonymous and diverse historical data, or if it is regularly checked (Figure 4C). By doing this, the system could help keep public order in a fair and democratic way (Figure 4D).

Evaluation. To test our pre-filled impact assessment report, we run a user study with 8 AI experts (3 women and 5 men, average age 33) who all had at least two years of experience in AI, including in areas like machine learning and natural language processing.

During the study, each person spent 10-15 minutes reading the report. After reading, they rated how they felt about the report's setup (how complete it was, how easy it was to use, and how applicable it was to other systems) and its details (how realistic the risks, solutions, and benefits seemed) using a scale from 1 (strongly disagree) to 5 (strongly agree). Then, we interviewed them to get more thoughts on the report's structure and content.

The results showed that most people thought the report was detailed ($\mu = 4.25$), applicable to many AI systems ($\mu = 4.5$), easy to use ($\mu = 4.6$), and realistic in presenting risks ($\mu = 4.5$), mitigation strategies ($\mu = 4.13$), and benefits ($\mu = 4.5$). They liked how the report was consistent and clearly described the system's use, especially when checking it against EU AI rules. As one participant stated, "you see it [five-format component], and it sticks with you.".

However, some thought the report was too general. For example, one participant said the solutions it suggested could really apply to any system handling personal data, not just camerabased AI. Another worry was that the report's polished look might make people accept it without enough critical review, missing the need for a deeper risk assessment. Overall, they agreed the report is a good starting point but still needs more detailed checks and input from legal experts to ensure accuracy and relevance.

We also have two more reports on our project's website⁶: one for a chatbot that checks responses in training tasks, and another for an AI system that evaluates damage after natural disasters. These are to show how the framework can be used in different scenarios.

DISCUSSION AND CONCLUSION

AI Design is a tool that helps developers and decision-makers create impact assessment reports about AI systems. It fills in parts of a report automatically, making it easier for developers to figure out if their AI is good to go and what problems they might need to fix. This is really useful for small companies because it saves time and money, helping them avoid big fines or costly fixes. The reports made can also be shared, helping everyone learn more about AI's impact.

AI Design is different from existing guidebooks for populating impact assessment reports in three main ways:

- 1) *Equal Importance:* Unlike some guides that focus too much on risks [15], our tool gives equal weight to the benefits and the risks.
- 2) *Personalized for Users:* Our tool adjusts its advice depending on who is using it, which means it is easier for everyone to understand and use, no matter their job role.
- 3) *Simpler and Practical:* Some guides are too long and hard to use, but our tool makes it straightforward with just 32 key statements to cover in a report.

From a technical point of view, our tool uses advanced AI to summarize important information and link it to complex rules like the EU AI Act. It also helps people understand how AI impacts society by including different viewpoints in the assessment process [13].

Practically, AI Design cuts down the costs and effort needed to meet legal standards. For example, when new data protection laws came in, some small companies struggled because they did not have enough resources¹⁴. Our tool helps prevent that by doing some of the heavy lifting, and it teaches people about the rules they need to follow.

However, there are a few limitations:

1) *Biases in Reports:* The reports might lean a certain way based on what stakeholders report. We need to find ways to check these biases and balance out the views. Methods like the Delphi method could help make sure no single viewpoint dominates the final assessment [17].

¹⁴https://gdpr.eu/2019-small-business-survey

- 2) *Not Covering All Impacts:* Our tool might miss some new or unique problems that need expert input. While it is a great starting point, experts need to check over the final report.
- Need for Good AI Governance: Organizations should have steps in place to manage AI risks, involving everyone from designers to external auditors. One way to manage risks is to follow a four-step process [14]:

First Step: Designers and developers make sure the AI meets ethical and technical standards. They give initial feedback on the AI's design.

- *Second Step:* An internal committee, like an Ethics Committee, checks the reports to make sure everything is right before they move on to the next stage.
- *Third Step:* The top management and other important groups within the company look at the report. They are the main people who need to understand and approve it.
- *Fourth Step:* External auditors review the report. This final check helps to make sure the AI follows all rules and to identify any problems that might still be there.
- 4) *Keeping Up with Changes:* Since our tool is based on the current EU AI Act, we need to keep it updated as new laws come out.

Overall, AI Design makes creating impact reports easier, but it still needs expert review and updates to stay effective and accurate.

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