INSIGHTS

Artificial Intelligence

The AI Mandate: Trump Administration's Executive Orders and AI Action Plan

Administration looks to win the global "AI Race" with incentives to develop infrastructure and support for AI development privately—but expressly forbids governmental use of AI models that reflect disfavored ideological biases

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On Wednesday, July 23, 2025, the Trump Administration released its AI Action Plan (Plan), titled "Winning the Race," outlining a comprehensive policy strategy to maintain U.S. leadership in artificial intelligence (AI) through three "pillars." Accompanying the Plan are three executive orders (EOs) focused on ideological neutrality in AI, promoting American AI exports, and streamlining infrastructure development supporting AI. This advisory provides analysis of key issues related to the new initiatives and their implications for industry and consumers.

President Trump directed his Administration's leadership to develop this national policy strategy in Executive Order 14179 ("Removing Barriers to American Leadership in Artificial Intelligence"), released in January after his decision to revoke significant portions of the prior Administration's AI policy. More than 10,000 comments were filed in response to the Administration's request for comments, reflecting the broad interest and engagement from nearly every sector of the economy and society. Following months of deliberation, the Administration released the Plan with over one hundred separate AI policy directives, followed by three EOs directed at:

- 1. Accelerating AI innovation,
- 2. Building American AI infrastructure,
- 3. Leading in AI diplomacy and security, and
- 4. Achieving the Administration's concept of ideological neutrality.

Takeaways

 Office of Science and Technology Policy (OSTP) and Office of Management and Budget (OMB) will lead efforts to repeal and reduce unnecessary regulatory barriers to AI innovation.

- Discretionary federal funds may be withheld from states with state laws deemed to burden Al innovation.
- Administration will review Federal Trade Commission (FTC)
 precedent and theories of liability that burden innovation and
 consider modifications.
- National Institute of Standards and Technology (NIST) and other agencies will develop guidelines for evaluating AI reliability and performance.
- Agencies will streamline permitting for data centers and energy infrastructure supporting AI.
- Federal government procurement power will be leveraged to ensure developers of large language models (LLMs) ensure ideological neutrality in their models.
- Commerce, State and OSTP will establish the American Al Exports Program (Program) supporting the development and deployment of U.S. Al export packages.
- Biden Administration Executive Order 14141, outlining Al infrastructure policies, is revoked.

The AI Action Plan

The Administration's <u>Al Action Plan</u> emphasizes deregulation, national competitiveness, and rapid adoption of emerging technologies. Key priorities include directing the OSTP and the OMB to eliminate regulatory barriers and streamline federal processes. The administration signals it may even withhold federal discretionary

funding for states with "burdensome" AI regulations (reflecting the Administration's support for limiting burdensome state laws following the Congressional decision to strip a state law moratorium from recent legislation). The Plan also directs a specific review of FTC precedent and theories of liability that are deemed to inhibit technological progress.

Procurement rules for large AI models are set to be revised to ensure objectivity and prevent ideological bias, while agencies like the NIST will be tasked with creating standards for AI reliability and performance. Notably, the Plan calls for aggressive adoption of AI within the armed forces, in part to maintain "global military preeminence." Mandates to meet this goal include establishing a DOD-led "proving ground" for AI and autonomous systems and identifying unique AI-related DOD workforce skills to be developed. In addition, the Plan calls for agencies such as the FDA and SEC (with support from DOJ) to create "regulatory sandboxes" and develop national standards in key sectors such as healthcare, energy, and agriculture to encourage the development of AI solutions in those sectors.

At the same time, the Administration recognizes the need for the development of resilient and secure AI systems as a "core activity" of the government and makes clear that AI systems used in national security applications must be secure-by-design, adversarially robust, resilient, and alert to potential malicious activities like data poisoning or adversarial example attacks. To enable this goal, the Plan directs the establishment of an AI Information Sharing and Analysis Center (AI-ISAC) to promote AI-security threat information and intelligence sharing across critical infrastructure sectors, as well as enhanced information sharing between public and private actors concerning AI-

specific vulnerabilities and threats.

The Plan calls for accelerated government adoption of AI, expediting permits for data centers and energy infrastructure, and using export controls to strengthen U.S. market dominance while restricting access by foreign adversaries to key technologies. Key initiatives under the AI Action Plan include the following.

Pillar I: Accelerating AI Innovation

Reduce regulatory barriers, foster innovation, and ensure AI systems reflect truth and American values.

Regulatory	Ensuring	Al Research	Workforce	Next-Gen
Reform	Ideological	and	Development	Manufacturing
	Neutrality	Development		and Science

Repeal	Federal	Expand	Prioritize AI	Invest in AI-
regulations	procurement	access to	literacy and	enabled
that hinder	rules will	large-scale	skills	manufacturing
Al	require AI	computing	development	and scientific
innovation,	systems to be	resources for	through	research.
including	"designed to	startups and	education,	
Biden-era	pursue	academics.	apprenticeships,	Develop high-
policies.	objective		and rapid	quality, AI-
	truth" and	Launch a new	retraining	ready datasets
Withhold	free from	National AI	programs.	while
federal	ideological	R&D Strategic		safeguarding
funding	bias,	Plan to guide	Pilot initiatives	privacy.
from states	particularly	federal	to address	
with	targeting	investments.	workforce	Expand access
restrictive	diversity,		displacement	to federal data
Al	equity, and	Establish	caused by AI	and enable
regulations.	inclusion	regulatory	adoption.	secure
	(DEI)	sandboxes for		computing
Review	frameworks.	testing Al		environments
(and		tools in		to enable
possibly	Developers	controlled		controlled
modify)	must disclose	environments.		access to
prior FTC	system .			restricted
decisions	prompts and			federal data.
to ensure	specifications			
they do not	to ensure			
stifle	transparency.			
innovation.				

Pillar II: Building AI Infrastructure

Supercharge the U.S. electric grid, expand data center capacity, and restore domestic semiconductor manufacturing.

Simplify environmental reviews under NEPA to expedite data center and energy infrastructure	Stabilize the electric grid by maintaining essential power plants and upgrading infrastructure.	Reinforce policies to bring semiconductor manufacturing back to the U.S. Ensure Al	Develop new security standards for AI data centers to protect against nation-state	Launch industry-driven training programs for Al infrastructure jobs.
Authorize federal lands for data center construction and energy generation.	Accelerate the adoption of innovative energy solutions to meet Al's growing demands.	computing stacks are free from foreign adversary influence.	Advance federal adoption of classified compute environments for Al workloads.	Develop national skills frameworks for critical Al- related occupations.

Semiconductor

Manufacturing

High-

Security

Data Centers

Workforce

Training for

Infrastructure

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Pillar III: Leading in AI Diplomacy and Security

Energy Grid

Modernization

Streamlining

Permitting

Promote American AI globally while countering adversarial influence.

American Al	Chinese Influence	Evaluations	Synthetic Media
Establish industry consortia to create AI export packages, including	Advocate for AI governance frameworks in international bodies that align	Evaluate frontier Al systems for risks such as cyberattacks and the development	Enhance data sharing to prevent the misuse of AI in synthesizing harmful
hardware, software, and governance models.	with American values. Strengthen export	of chemical, biological, radiological, nuclear, or	pathogens. Develop guidelines for
Leverage federal financing tools to support AI exports to allied nations.	controls to deny adversaries access to advanced AI technologies.	explosives weapons. Collaborate with private sector developers to protect Al innovations from security threats.	evaluating and combatting malicious deepfakes and other Algenerated synthetic media that challenge our legal system.

National Security

Biosecurity and

July 23 AI Executive Orders

Countering

Exporting

Preventing "Woke" AI in the Federal Government

This EO leverages federal procurement power to mandate that large language models (LLMs) procured by government agencies adhere to "Unbiased AI Principles," emphasizing truthfulness and "ideological neutrality." While the EO largely avoids regulating private-sector AI functionality, it asserts the government's obligation to procure AI models that prioritize accuracy over ideological agendas. The Office

of Management and Budget (OMB) is tasked with issuing guidance by November 2025, requiring agencies to adopt procedures ensuring compliance with these principles. The EO specifically targets DEI frameworks as a "most pervasive and destructive" ideology, and developers must disclose system prompts and specifications to meet new transparency standards. Noncompliance may result in contract termination, subjecting vendors to decommissioning costs if deficiencies are not cured.

Promoting the Export of the American AI Technology Stack

This EO seeks to ensure that American AI technologies, standards, and governance models are adopted worldwide to strengthen relationships with our allies and secure our continued technological dominance. The EO establishes a national strategy to maintain U.S. leadership in AI by developing a program for promoting the global export of the full-stack of American AI technologies and simultaneously decreasing international dependence on AI technologies developed by U.S. adversaries.

Accelerating Federal Permitting of Data Center Infrastructure

This EO aims to accelerate the development of AI-related data centers and supporting infrastructure by reducing regulatory barriers, expediting permitting, and prioritizing the use of federal lands and resources to enable the development of "Data Center Projects" that require over 100 megawatts (MW) of new electric load for AI tasks like inference, training, and simulation, as well as "Covered Components" such as semiconductors, routers, and energy infrastructure. Priority will be given to "Qualifying Projects," defined as those with at least \$500 million in capital investment, over 100 MW of new electric load, national security significance, or official designation by the Secretaries

Implications for Stakeholders

- AI Developers doing business with the federal government will need to ensure compliance with new federal procurement rules emphasizing transparency and ideological neutrality.
- Federal agencies will need to revise contracts and procurement processes to align acquiring AI models that satisfy "Unbiased AI Principles" of "truth-seeking" and ideological neutrality.
- Private companies will have opportunities to propose and participate in AI export programs and infrastructure projects but must navigate stricter export controls and security requirements.
- Federal agencies will begin work on developing guidelines and evaluation standards to define and measure AI system reliability and performance.
- Workers will be better equipped for changes brought on by AI through significant investments in AI skills development and retraining programs to address job displacement and prepare for AI-driven roles.

Conclusion

The Trump Administration's AI Action Plan and accompanying executive orders represent a multi-prong strategy to enhance U.S. leadership in the developing global AI market. By fostering innovation, building critical infrastructure, and promoting American values globally, the plan seeks to position the U.S. as the dominant force in AI while addressing national security concerns and countering

adversarial influence. However, the emphasis on ideological neutrality and regulatory rollback will require balancing innovation, governance, and ethical considerations.

DWT has worked extensively on <u>AI regulation and compliance</u>. If you have any questions or would like to learn more about AI regulation under the Trump Administration, or other AI-related matters, please contact the authors.



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