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White House Launches AI Action Plan and Executive Orders to Promote Innovation, Infrastructure, and International Diplomacy and Security

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On July 23, 2025, the White House released the much anticipated AI Action Plan (Action Plan), along with three accompanying Executive Orders (EO).

- The Action Plan—entitled *Winning the Race: America's AI Action Plan*—identifies innovation, infrastructure, and international diplomacy and security as core pillars of the Administration's plan to promote the development and deployment of AI, and it outlines near-term policy goals and recommends policy actions to put these pillars into action.

- The three new Executive Orders—(1) Promoting The Export of the American AI Technology Stack, (2) Accelerating Federal Permitting of Data Center Infrastructure, and (3) Preventing Woke AI in the Federal Government—each align with select recommended policy actions from the Action Plan.

Together, these actions underscore the Administration's focus on facilitating AI innovation and ensuring U.S. competitiveness, while at the same time promoting security. The Plan will launch a series of workstreams across the federal government, including guidance on cybersecurity and incident response; updates to the National Institute of Standards and Technology (NIST) AI Risk Management Framework (AI RMF); and updated federal procurement guidelines. The Plan calls on action from agencies with AI governance and oversight experience, including the Cybersecurity and Infrastructure Security Agency (CISA) within the Department of Homeland Security (DHS)

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AI Executive Order
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and NIST, while at the same time recommending the establishment of new approaches and structures, including a new AI Information Sharing and Analysis Center (AI-ISAC) within DHS. Overall, the new releases provide a roadmap to the Trump Administration's approach to AI policy, which will have impacts for both the federal government and the private sector.

Below we provide key background information, an outline the Action Plan's policy objectives, including highlighting notable recommended policy actions, and briefly summarize the Executive Orders.

Key Background

The Action Plan fulfills the mandate in President Trump's January 2025 Executive Order 14179, which called for the development of an AI "action plan" to implement the "policy of the United States to sustain and enhance America's global AI dominance in order to promote human flourishing, economic competitiveness, and national security." The White House Office of Science and Technology Policy (OSTP) received more 10,000 comments from stakeholders following its request for feedback on what federal policies were "needed to sustain and enhance America's AI dominance, and to ensure that unnecessarily burdensome requirements do not hamper private sector AI innovation."

AI Action Plan

The Action Plan categorizes the policy objectives and recommendations into three pillars: (1) Accelerate AI Innovation; (2) Build American AI Infrastructure; and (3) Lead in International AI Diplomacy and Security.

Pillar I: Accelerate AI Innovation. One of the Administration's primary AI policy goals is to ensure that the U.S. is a leader in the development and deployment of AI systems. The Action Plan outlines 15 policy objectives under this first pillar to identify federal government action that promotes private-sector-led innovation. For example:

- **Reduce Red Tape and Onerous Regulation.** The Action Plan calls on the federal government to ensure its regulations and policies are not too onerous on AI, recommending all Federal agencies work "to identify, revise, or repeal regulations, rules, memoranda, administrative orders, guidance documents, policy statements, and interagency agreements that unnecessarily hinder AI development or deployment."
  - This policy objective recommends several new workstreams across the federal government to promote this goal, including a Request for Information from OSTP to seek information about federal regulations that hinder AI innovation and adoption, and a review of Federal Trade Commission (FTC) investigations commenced under the previous administration to ensure that they do not advance theories of liability that unduly burden AI.
  - The AI Action Plan considers state regulations, stating that "The Federal government should not allow AI-related Federal funding to be directed toward states with burdensome AI regulations that waste these funds, but should also not interfere with states' rights to pass prudent laws that are not unduly restrictive to innovation." Relatedly, the Plan recommends that "Federal agencies that have

AI-related discretionary funding programs [should] ensure, consistent with applicable law, that they consider a state's AI regulatory climate when making funding decisions and limit funding if the state's AI regulatory regimes may hinder the effectiveness of that funding or award," and that the Federal Communications Commission (FCC) evaluate whether state AI regulations interfere with the agency's ability to carry out its obligations and authorities under the Communications Act.

- **Ensure that Frontier AI Protects Free Speech and American Values**. The Plan holds that AI systems should be built from the ground up with freedom of speech and expression in mind, and U.S. government policy should not interfere with that objective. Recommended policy actions under this policy objective include revisions to NIST's AI RMF and updating federal procurement guidelines to require frontier large language model (LLM) developers who contract with the government to ensure that their systems are objective.

- **Enable AI Adoption**: The Plan calls on the federal government to promote a dynamic, "try-first" culture for AI across American industry through, among other things, the establishment of regulatory sandboxes or AI Centers of Excellence, prioritizing collaboration and intelligence on foreign frontier AI projects that may have national security implications.

- **Build an AI Evaluations Ecosystem**: The Plan encourages Federal regulators to explore the use of evaluations in their application of existing law to AI systems. Recommended actions for this policy objective include the Center for AI Standards and Innovation (CAISI) convening meetings at least twice per year to share learnings and best practices on building AI evaluation; and investment in AI testbeds that pilot AI systems in secure, real-world settings, allowing researchers to prototype new AI systems and translate them to the market.

- **Accelerate AI Adoption in Government**: The Plan explains that with existing AI tools, the federal government can and should serve the public with far greater efficiency and effectiveness by, among other things, formalizing the Chief Artificial Intelligence Officer Council (CAIOC) as the primary venue for interagency coordination and collaboration on AI adoption, creating a talent-exchange program designed to allow rapid details of federal staff to other agencies in need of specialized AI talent, and providing federal agency employees access to, and training for, frontier language models.

- **Protect Commercial and Government AI Innovations**: The Plan calls on the U.S. government to work closely with industry to appropriately balance the dissemination of cutting-edge AI technologies with national security concerns. Recommended policy actions under this policy objective include collaborating with leading American AI developers to enable the private sector to actively protect AI innovations from security risks, including malicious cyber actors, insider threats, and others.

Additional policy objectives under the innovation pillar include to:

- **Encourage Open-Source and Open-Weight A**I.
- **Empower American Workers in the Age of AI.**

- **Support Next-Generation Manufacturing.**

- **Invest in AI-Enabled Science.**

- **Build World-Class Scientific Datasets.**

- **Advance the Science of AI.**

- **Invest in AI Interpretability, Control, and Robustness Breakthroughs.**

- **Drive Adoption of AI within the Department of Defense (DOD).**

- **Combat Synthetic Media in the Legal System.**

Pillar II: Build American AI Infrastructure. This pillar deals with security and incident reporting related to AI and critical infrastructure. In particular:

- **Bolster Critical Infrastructure Cybersecurity.** The Plan states that "[a]ll use of AI in safety-critical or homeland security applications should entail the use of secure-by-design, robust, and resilient AI systems that are instrumented to detect performance shifts, and alert to potential malicious activities like data poisoning or adversarial example attacks." Recommendations under this policy include establishing an AI-ISAC led by DHS; developing guidance for the private sector regarding remediating and responding to AI-specific vulnerabilities and threats; and leveraging existing information sharing mechanisms to ensure collaboration and consolidate sharing of known vulnerabilities.

- **Promote Secure-By-Design AI Technologies and Applications.** The Plan builds on existing work to secure federal AI systems and national security applications and calls on the U.S. government to continue to "promot[e] resilient and secure AI development and deployment."

- **Promote Mature Federal Capacity for AI Incident Response.** The Plan calls on the U.S. government to "promote the development and incorporation of AI Incident Response actions into existing incident response doctrine and best-practices for both the public and private sectors." Recommended actions under this policy include recommendations for NIST and CISA to include AI in its standards and guidance related to incident response.

The Action Plan's second pillar also focuses on federal activity that can help to develop and grow the U.S.'s energy capacity through promoting and removing barriers to building out the infrastructure needed to support and provide a strong energy grid. For example, this pillar includes the following policy objectives:

- **Create Streamlined Permitting for Data Centers, Semiconductor Manufacturing Facilities, and Energy Infrastructure while Guaranteeing Security.**

- **Develop a Grid to Match the Pace of AI Innovation**.

- **Restore American Semiconductor Manufacturing.**

- **Build High-Security Data Centers for Military and Intelligence Community Usage.**

- **Train a Skilled Workforce for AI Infrastructure.**

Pillar III: Lead in International AI Diplomacy and Security. The Action Plan's last pillar focuses on the U.S.'s role in driving adoption of American AI systems, computing hardware, and standards throughout the world. The Plan notes that while America currently is the global leader on data center construction, computing hardware performance, and models, the U.S. must "leverage this advantage into an enduring global alliance, while preventing adversaries from free-riding on U.S. innovation and investment." The six specific policy objectives for this pillar include:

- **Export American AI to Allies and Partners.**
- **Counter Chinese Influence in International Governance Bodies.**
- **Strengthen AI Compute Export Control Enforcement.**
- **Plug Loopholes in Existing Semiconductor Manufacturing Export Controls.**
- **Ensure that the U.S. Government is at the Forefront of Evaluating National Security Risks in Frontier Models.**
- **Invest in Biosecurity.**

<u>**AI Executive Orders**</u>

Promoting The Export of the American AI Technology Stack (Export EO). The purpose of this EO is to establish a coordinated national effort to support the American AI industry by promoting the export of full-stack American AI technology packages. Specifically, the Export EO requires the Secretary of Commerce, Secretary of State, and Director of OSTP to establish and implement an American AI Exports Program (Program) to support the development and deployment of United States full-stack AI export packages by October 21, 2025. Once the Program is running, the Secretary of Commerce shall solicit AI technology packages that include AI-optimized computer hardware, data center storage, cloud services, and networking, data pipelines and labeling systems, and AI models and systems. The Export EO also mandates that the Economic Diplomacy Action Group (EDAG), chaired by the Secretary of State, coordinate mobilization of federal financing tools in support of priority AI export packages.

Accelerating Federal Permitting of Data Center Infrastructure (Data Center EO). This EO is designed to facilitate the rapid and efficient buildout of AI data centers and infrastructure that powers them. The Secretary of Commerce and Director of OSTP are directed to launch an initiative that provides financial support for specific types of Data Center Projects, which could include loans and loan guarantees, grants, tax incentives, and offtake agreements. The Data Center EO includes provisions to streamline the approval processes for these data center projects including requiring the Administrator of the Environmental Protection Agency to develop guidance to help expedite environmental reviews for qualified reuse. The Department of the Interior and the Department of Energy shall, after consultation with industry and further in consultation with the Department of Commerce, offer appropriate authorizations for federal sites, and similarly the Secretary of Defense is directed to identify suitable sites on military installations for infrastructure required to build Data Center Projects and competitively lease available lands for Data Center Projects that support the Department of Defense's energy, workforce, and mission needs, subject to security and force protection considerations.

The Data Center EO also revokes the Biden Administrations January 2025 Executive Order 14141, Advancing United States Leadership in Artificial Intelligence Infrastructure, which set out principles for the federal government to abide by to enable the development and operation of AI infrastructure, specifically data centers, in the United States.

Preventing Woke AI in the Federal Government. The purpose of this EO is to avoid federal procurement of AI systems with "ideological biases or social agendas." The EO identifies two "unbiased AI principles" that should be used to evaluate procurement of large language models (LLM): (1) whether LLMs are truthful in responding to user prompts seeking factual information or analysis; and (2) whether LLMs are ideologically neutral. It directs OMB to issue guidance to agencies by November 20, 2025, to implement processes for this type of analysis and procurement of LLMs, and within 90 days of issuing such guidance, requires agencies to adopt procedures to enforce OMB's guidance.

Conclusion

The Action Plan and EOs lay the groundwork for this Administration's federal policies on AI. The Administration will likely build on the items released yesterday and industry can be looking for federal agency actions that align with the recommended policy actions.

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Wiley's Artificial Intelligence Practice counsels clients on AI compliance, risk management, and regulatory and policy approaches, and we engage with key government stakeholders in this quickly moving area. Please reach out to the authors with any questions.

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