

UPDATES

The Trump Administration's 2025 AI Action Plan – Winning the Race: America's AI Action Plan – and Related Executive Orders

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On July 23, 2025, the Trump administration released its much-anticipated Al Action Plan, outlining 90 federal policy positions across three key pillars: Accelerating Innovation, Building American Al Infrastructure, and Leading in International Diplomacy and Security. These pillars are designed to guide near-term action and are underpinned by three cross-cutting priorities: protecting and promoting American workers, ensuring that artificial intelligence (AI) systems are trustworthy and free from ideological bias, and safeguarding AI from misuse, theft, or other risks posed by malicious actors. The scope of the AI Action Plan demonstrates the far-reaching impact of AI, with policy positions affecting not only technology but also trade, national security, cybersecurity, energy, labor, education, environmental regulation, antitrust, science, and financial markets.

Accompanying the AI Action Plan were three executive orders. The first promotes the development and export of the "American AI Technology Stack." The second directs a streamlining of the federal permitting process for building data centers. The third mandates the adoption of "Unbiased AI Principles," which prioritize "truth-seeking" in response to AI user prompts and "ideological neutrality" in federal government procurement. These executive orders build upon four previous AI-related executive orders issued by President Donald Trump earlier in 2025 as well as two from his first term.

The AI Action Plan follows on President Trump's January 23, 2025, **Executive Order 14179**, "Removing Barriers to American Leadership in Artificial Intelligence." The AI Action Plan was drafted by the White House Office of Science and Technology Policy (OSTP), which coordinated with advisers across the federal government and solicited input from the private sector. The AI Action Plan opens with a quote from President Trump, "As our global competitors race to exploit [a new frontier of scientific discovery], it is a national security imperative for the United States to achieve and maintain unquestioned and unchallenged global technological dominance. To secure our future, we must harness the full power of American innovation."

Accelerating Innovation

The first pillar, Accelerating Innovation, is designed to ensure that the United States remains at the

forefront of AI research, development, and deployment. This involves increasing federal investment in AI research and development, fostering public-private partnerships to develop "secure, full stack AI export packages," and supporting the commercialization of cutting-edge AI technologies. It also seeks to promote adoption of AI through a variety of measures, including promoting interoperability and leveraging open-source and open-weight AI. The AI Action Plan seeks to "ensure America has leading open models founded on American values." It further notes that "[o]pen-source and open-weight models could become global standards in some areas of business and in academic research worldwide. For that reason, they also have geostrategic value." The AI Action Plan further proposes to strengthen export control enforcement to protect American AI innovation and promote the adoption of American AI stacks within a global alliance.

The AI Plan calls for streamlining regulatory pathways to accelerate the introduction of new AI solutions to the market. This principle was also reflected in Vice President Vance's remarks at the Artificial Intelligence Action Summit in Paris earlier this year. The Trump administration intends to solicit private sector and public input through an OSTP Request for Information (RFI) on federal rules that could be eliminated to help promote AI innovation as well as to review Federal Trade Commission (FTC) investigations initiated under the Biden administration, including final orders and consent decrees.

This focus on deregulation underscores a contrast between the Trump administration, which is emphasizing deregulation, and certain states that are strengthening AI regulation and enforcement. This divergence is particularly salient in light of an unsuccessful attempt to impose a 10-year moratorium on state-level AI regulation in the One Big Beautiful Bill Act, which President Trump signed into law on July 4, 2025. The moratorium, which was initially included in the House version of the bill, was taken out of the Senate version by a near unanimous vote. Relatedly, the AI Action Plan recommends that the White House Office of Management and Budget (OMB) collaborate with federal agencies overseeing AI-related discretionary funding programs to assess the states' AI regulatory environment as part of funding decisions, ensuring that federal resources are not allocated to states with legal regimes deemed to "hinder the effectiveness of such funding."

According to the Al Action Plan, by reducing legal risks and prioritizing support for market-driven innovation, the administration aims to drive economic growth, create high-quality jobs, and maintain America's competitive edge in the global technology landscape.

Building American Al Infrastructure

The second pillar, Building American AI Infrastructure, centers on establishing the physical, digital, and human capital foundations necessary for robust AI development and deployment. This includes modernizing, securing, and expanding data center capacity, enhancing and expanding the power grid, improving American industry's access to high-performance computing resources, and ensuring the availability of secure, high-quality data for AI training and testing. The AI Action Plan also places a strong emphasis on workforce development, with initiatives to encourage the upskilling of American workers and AI education pipelines. This builds on the cyber workforce initiative of the Biden administration.

Security is a central theme throughout the infrastructure proposals, with multiple policy initiatives focused on national and cybersecurity imperatives. The AI Action Plan highlights the dual objectives of enhancing AI infrastructure for geopolitical leadership and protecting against foreign adversary threats. It

calls for the establishment of an AI Information Sharing and Analysis Center (AI-ISAC) to facilitate AI threat intelligence sharing. Several initiatives are aimed at developing standards and controls to ensure that American AI is not built with or supported through the supply chain by "adversarial technology that could undermine U.S. AI dominance."

In addition to increased scrutiny of technologies, the AI Action Plan emphasizes the strategic importance of data, stating that "high quality data has become a national strategic asset." The Trump administration intends to develop minimum data quality standards, expand access to federal data, and break down federal data silos. By investing in secure and resilient infrastructure, the administration seeks to provide American innovators with the resources necessary to succeed and to develop AI tools that reflect American values.

Leading in International Diplomacy and Security

The third pillar, Leading in International Diplomacy and Security, acknowledges the global implications of AI and seeks to ensure that the United States shapes international standards amid a rapidly evolving landscape of international AI laws, regulations, and technical standards. The AI Action Plan outlines strategies to promote the adoption of American-developed AI technologies and standards and to leverage America's global leadership in technology to forge "an enduring global alliance." The AI Action Plan promotes exporting America's "full AI technology stack — hardware, models, software applications and standards — to all countries willing to join America's AI alliance." The AI Plan also warns that "the failure to meet this demand would be an unforced error, causing these countries to turn to our rivals."

Pillar III includes measures to encourage allies to implement export controls aligned with the U.S. regime, thereby protecting American AI intellectual property and preventing the export of sensitive technologies to adversaries. These efforts are also intended to bolster the cybersecurity and resilience of critical infrastructure against AI-enabled threats. The AI Action Plan further proposes initiatives to refine American standards, including a review of the globally recognized National Institute of Standards & Technology (NIST) AI Risk Management Framework. The Trump administration aims to ensure that AI advances serve the interests of the United States and its allies, reflect the administration's priorities and values, and mitigate risks associated with the misuse or weaponization of AI.

Developments to Come

As emphasized in President Trump's preamble and throughout the three pillars, the Trump administration's 2025 Al Action Plan is focused on promoting American technology dominance. While the Al Action Plan identifies extensive policy positions in a variety of areas, we expect the Administration's Al strategy will continue to evolve in an effort to keep pace with Al's warp-speed evolution.

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