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President Trump's "America's AI Action Plan," is Set to Fundamentally Shape AI in the U.S.

by Stephen M. Anstey , John C. F. Loving , Keval V. Patel

On July 23, 2025, President Trump unveiled "America's AI Action Plan." As noted in the related announcement by the White House, "the Plan identifies over 90 Federal policy actions across three pillars—Accelerating Innovation, Building American AI Infrastructure, and Leading in International Diplomacy and Security." The White House notes that the "key policies" of the Plan include "exporting American AI, promoting rapid buildout of data centers, enabling innovation and adoption, and upholding free speech in Frontier Models." The Plan establishes extensive and varied requirements for federal agencies across the government and is likely to serve as the fulcrum for the Trump Administration's ambitious AI goals for the United States. Entities impacted by or interested in AI should closely monitor the implementation of the AI Action Plan and proactively engage by responding to Requests for Information, collaborating with agency officials, communicating with the Administration, and lobbying Congress on relevant issues.

In some ways, the AI Action Plan reflects President Biden's 2023 Executive Order on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence, which was revoked by the Trump Administration. Both plans, for example, set numerous requirements for federal agencies to implement a cohesive federal approach to AI. However, President Trump's AI Action Plan emphasizes American AI dominance, supporting AI utilization at scale, workforce development, defense implications, and boosting support for both the technology and the infrastructure that supports it. For example, the AI Action Plan calls for the removal of "red tape and onerous regulation" believed to limit American AI leadership, as well as "empowering American Workers in the age of AI, supporting next-generation manufacturing, protecting commercial and government AI innovations, and exporting American AI to allies and partners."

One particularly distinctive aspect of President Trump's AI Action Plan is the emphasis on infrastructure development, as demonstrated in "Pillar II: Build American AI Infrastructure." The President plans to support these efforts by "creating streamlined permitting for data centers, semiconductor manufacturing facilities, and energy infrastructure while guaranteeing security; developing a grid to match the pace of AI innovation; restoring American semiconductor manufacturing; building high-security data centers for military and intelligence community usage; training a skilled workforce for AI infrastructure; bolstering critical infrastructure cybersecurity;

promoting secure-by-design AI technologies and applications; and promoting mature federal capacity for AI incident response." This infrastructure-centric focus significantly deviates from the Biden Administration's efforts, which concentrated more directly on the development of AI technology itself. Notably, the AI Action Plan also heavily emphasizes America's positioning in the global AI arms race. Pillar III addresses the United States global role in AI as it relates to finance, exports, manufacturing pipelines, and protections.

The AI Action Plans lists numerous noteworthy "recommended policy actions" for the federal government, such as:

- Led by the Office of Science and Technology Policy (OSTP), launch a Request for Information from businesses and the public at large about current Federal regulations that hinder AI innovation and adoption, and work with relevant Federal agencies to take appropriate action.
- Led by the Office of Management and Budget (OMB) and consistent with Executive Order 14192 of January 31, 2025, "Unleashing Prosperity Through Deregulation," work with all Federal agencies to identify, revise, or repeal regulations, rules, memoranda, administrative orders, guidance documents, policy statements, and interagency agreements that unnecessarily hinder AI development or deployment.
- Led by OMB, work with Federal agencies that have AI-related discretionary funding programs to 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.
- Update Federal procurement guidelines to ensure that the government only contracts with frontier large language model (LLM) developers who ensure that their systems are objective and free from top-down ideological bias.
- Continue to foster the next generation of AI breakthroughs by publishing a new National AI Research and Development (R&D) Strategic Plan, led by OSTP, to guide Federal AI research investments.
- Led by the Department of Defense (DOD) in coordination with the Office of the Director of National Intelligence (ODNI), regularly update joint DOD-Intelligence Community (IC) assessments of the comparative level of adoption of AI tools by the United States, its competitors, and its adversaries' national security establishments, and establish an approach for continuous adaptation of the DOD and IC's respective AI adoption initiatives based on these AI net assessments.
- Led by the Department of Labor (DOL), the Department of Education (ED), NSF, and DOC, prioritize AI skill development as a core objective of relevant education and workforce funding streams. This should include promoting the integration of AI skill development into relevant programs, including career and

technical education (CTE), workforce training, apprenticeships, and other federally supported skills initiatives.

- Create an online portal for NSF's National Secure Data Service (NSDS) demonstration project to provide the public and Federal agencies with a front door to AI use-cases involving controlled access to restricted Federal data.
- The DOD, DOE, CAISI at DOC, the Department of Homeland Security (DHS), NSF, and academic partners should coordinate an AI hackathon initiative to solicit the best and brightest from U.S. academia to test AI systems for transparency, effectiveness, use control, and security vulnerabilities.
- Establish new Categorical Exclusions under NEPA to cover data center-related actions that normally do not have a significant effect on the environment. Where possible, adopt Categorical Exclusions already established by other agencies so that each relevant agency can proceed with maximum efficiency.
- Expand efforts to apply AI to accelerate and improve environmental reviews, such as through expanding the number of agencies participating in DOE's PermitAI project.
- Stabilize the grid of today as much as possible. This initial phase acknowledges the need to safeguard existing assets and ensures an uninterrupted and affordable supply of power. The United States must prevent the premature decommissioning of critical power generation resources and explore innovative ways to harness existing capacity, such as leveraging extant backup power sources to bolster grid reliability during peak demand. A key element of this stabilization is to ensure every corner of the electric grid is in compliance with nationwide standards for resource adequacy and sufficient power generation capacity is consistently available across the country.
- Optimize existing grid resources as much as possible. This involves implementing strategies to enhance the efficiency and performance of the transmission system. The United States must explore solutions like advanced grid management technologies and upgrades to power lines that can increase the amount of electricity transmitted along existing routes. Furthermore, the United States should investigate new and novel ways for large power consumers to manage their power consumption during critical grid periods to enhance reliability and unlock additional power on the system.
- Prioritize the interconnection of reliable, dispatchable power sources as quickly as possible and embrace new energy generation sources at the technological frontier (e.g., enhanced geothermal, nuclear fission, and nuclear fusion). Reform power markets to align financial incentives with the goal of grid stability, ensuring that investment in power generation reflects the system's needs.
- Create a strategic blueprint for navigating the complex energy landscape of the 21st century. By stabilizing the grid of today, optimizing existing grid resources, and growing the grid for the future, the United States can rise to the challenge of winning the AI race while also delivering a reliable and affordable power grid for all Americans.

- Create new technical standards for high-security AI data centers, led by DOD, the IC, NSC, and NIST at DOC, including CAISI, in collaboration with industry and, as appropriate, relevant Federally Funded Research and Development Centers.
- Establish and operationalize a program within DOC aimed at gathering proposals from industry consortia for full-stack AI export packages. Once consortia are selected by DOC, the Economic Diplomacy Action Group, the U.S. Trade and Development Agency, the Export-Import Bank, the U.S. International Development Finance Corporation, and the Department of State (DOS) should coordinate with DOC to facilitate deals that meet U.S.-approved security requirements and standards.

The AI Action Plan will significantly influence AI development over the coming years. Given President Trump's extensive authority over federal agencies, robust compliance with the Plan's outlined policy actions is anticipated. Just as President Biden's Executive Order significantly shaped AI initiatives across federal agencies, President Trump's AI Action Plan is poised to have an even more profound and far-reaching impact. Entities affected by or interested in AI should closely monitor the Plan's implementation and proactively engage with the federal government as necessary.

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