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Request for Information: Development of a 2025 National Artificial Intelligence Research and Development Strategic Plan

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Submitter Information

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General Comment

See attached file(s)

Attachments

Accenture Official Response National AI R and D Strategic Plan RFI



Faisal D'Souza
Networking and Information Technology Research and Development (NITRD)
National Coordination Office (NCO)
2415 Eisenhower Avenue
Alexandria, VA 22314

May 29th, 2025

Re: RFI on the Development of a 2025 National AI R&D Strategic Plan

Dear Mr. D'Souza,

Artificial intelligence (AI) presents a transformative opportunity for the United States to strengthen economic competitiveness, enhance national security, and lead globally in technological innovation. With the right strategic direction, the U.S. can shape the trajectory of AI development in ways that reflect its values and reinforce its long-term leadership. This moment demands a coordinated effort to fully realize AI's potential.

Accenture is deeply embedded in the deployment of AI across the U.S. economy, partnering with leading companies in industries ranging from aerospace, defense, and manufacturing, to financial services and consumer goods, as well as public sector organizations. This cross-industry vantage point provides Accenture with unique insight into both the immense promise of AI, and the policy, infrastructure, and workforce challenges that must be addressed to unlock it.

We were pleased to submit a response to the administration's AI Action Plan request earlier this year.¹ For provisions that need to be improved or re-emphasized in the Strategic Plan, we would like to highlight the following areas from our action plan response:

- Reinforcing Domestic AI Innovation and Industrial Capacity
- Developing a National AI Workforce Strategy
- Accelerating Responsible Private -Sector AI Deployment
- Strengthening U.S. Leadership in Global Governance

We remain at your disposal to answer your questions or provide additional information.

Sincerely,

Gabrielle D'Adamo Singer
Government Affairs Lead, Americas
Accenture

1. REINFORCE DOMESTIC AI INNOVATION AND INDUSTRIAL CAPACITY

The next iteration of the National AI R&D Strategic Plan should place a strong focus on securing and expanding the domestic AI industrial base. In today's environment of intensifying geopolitical and economic competition, AI capability is not only a commercial advantage but a national security imperative. Many of the programs introduced in the 2023 plan, including public-private R&D partnerships, regional tech hubs, and strategic investment in AI talent pipelines provide a durable foundation. The updated strategy should reaffirm these efforts while strengthening and clarifying the government's role in supporting the full AI technology stack. Specifically, the plan should:

- **Support the Continued Funding of Tech Hubs.** The Tech Hubs Program aims to strengthen U.S. economic and national security with investments in regions across the country. The program brings together diverse public, private, and academic partners into collaborative consortia focused on driving regional growth. With their existing innovation assets as a foundation, these Tech Hubs will create regional economies around AI; build the workforce of the future; enable businesses to start and scale, particularly in underemployed and deindustrialized communities and develop and deploy critical and emerging technologies.
- **Address Critical Infrastructure and Permitting Bottlenecks.** The updated Strategic Plan should reaffirm the importance of addressing infrastructure and accessibility challenges that underpin the development and deployment of large-scale AI systems. AI innovation requires an increasing amount of energy to power data centers, estimated to consume up to seven percent of U.S. electricity by 2028, and between equipment backlogs, permitting delays and construction, it currently takes a decade or longer to bring a new nuclear facility online. The 2023 plan acknowledged many of these issues, but the current pace and scale of advancement in things like model training and inferencing requires more deliberate focus on system-level dependencies like energy and permitting. Given the rapid growth in demand for compute and the central role of foundational models, infrastructure is now a limiting factor to national competitiveness. The strategy should continue to emphasize the need for reliable and scalable access to power and explore the use of AI itself to improve the speed and quality of federal and interagency environmental reviews, enabling more timely decisions.
- **Codify and Expand the National AI Research Resource for “Little Tech” and Refocus Government-Funded Basic Research.** The strategy should also emphasize the need to expand access to compute resources, ensuring that small and mid-sized companies have the tools necessary to innovate, and that the next great American AI start-up isn't held back by infrastructure barriers. One of the most effective mechanisms to achieve this is through a well-supported National AI Research Resource (NAIRR), which provides critical resources for AI researchers to allow for next round of U.S.-led development in AI applications. At the same time, the strategy should reaffirm and expand the federal government's role in supporting basic research as a critical engine of both theoretical advancement and mission-relevant innovation. Agencies such as the National Science Foundation (NSF) and DARPA play a foundational role in seeding groundbreaking research that industry later translates into commercial applications. While early-stage scientific AI research may not yield immediate market returns—and is

therefore often underfunded by the private sector—it provides the essential building blocks of the U.S. innovation ecosystem.

2. DEVELOP A NATIONAL AI WORKFORCE STRATEGY

As AI becomes deeply integrated across sectors of the U.S. economy, AI fluency is becoming a prerequisite for workforce competitiveness. Without sustained investment and coordination, the widening mismatch between the pace of technological advancement and workforce preparedness will constrain innovation and exacerbate regional and demographic disparities. The 2023 Plan acknowledged the importance of cultivating AI talent and broadening participation. The next iteration must build on that foundation by treating workforce development as a core element of U.S. economic and national security strategy. In addition to formal, traditional education pathways, the federal government should also continue to enable nontraditional training pathways, supporting mid-career reskilling, apprenticeships, and ensuring that AI opportunity reaches underrepresented communities. To that end, the updated strategy should:

- **Reaffirm the importance of industry-led reskilling and upskilling programs**, which were highlighted in the 2023 strategy as essential to meeting evolving workforce needs. Specifically, the revised plan should recommend targeted federal tax incentives to support employer-led training programs in AI and adjacent digital skills. Legislative proposals such as the Upskilling and Retraining Assistance Actⁱⁱ which would expand employer tax exclusions for educational assistance, offer a viable policy mechanism.
- **Include a new recommendation to develop an AI Workforce Impact and Opportunity Tool**, aimed at equipping employers, especially small- and medium-sized entities (SMEs), with predictive analytics to assess the impact of AI on workforce needs. This tool could extend and modernize the Department of Labor’s Occupational Information Network (O*NET), incorporating scenario modeling, skill transition pathways, and return-on-investment (ROI) insights to support evidence-based workforce planning.
- **Encourage and reemphasize the expansion of modernized, next-generation apprenticeships, including outside the traditional Registered Apprenticeship framework.** The updated strategy should recommend reducing administrative barriers to state training funds under the Workforce Innovation and Opportunity Act and promoting earn-as-you-learn models that enable entry into high-demand technical fields such as those mentioned in Accenture’s R12 plan, including data architecture, data engineering, and AI computational science.

The U.S. currently lags China and India in both the number of STEM graduates and the percentage of those graduates who enter STEM-related fields.ⁱⁱⁱ To begin to address this issue, it is important that the new strategy place greater strategic emphasis not only on higher education, but also on significantly strengthening foundational STEM education—starting in kindergarten and continuing through secondary school. This means expanding instruction in mathematics, statistics, physics, and computer science, which are critical building blocks for future AI literacy. Several peer nations already outperform the U.S. by embedding these disciplines more deeply and earlier in their educational systems. In addition to this foundational focus, the strategy should also support the introduction of AI concepts in K-

12 education, as recommended by the Bipartisan House Task Force on AI, along with increased resources and professional development opportunities for educators.^{iv}

- **Encouraging the replication of successful state-led models**, such as Florida’s statewide K–12 AI curriculum developed in partnership with the University of Florida, which introduces AI learning standards beginning in kindergarten.^{vi} These models demonstrate that AI and STEM education can be systematically embedded at scale.
- **Recommending federal coordination of industry- and academia-led educational resources, such as open curricula and educator toolkits**, to ensure national reach. A federally convened summit on the future of AI education could help align efforts and expand access in rural, exurban, and underserved regions that often lack direct exposure to AI industry ecosystems.
- **Proposing targeted federal incentives to support state and local K–12 AI and foundational STEM curriculum development**, leveraging guidance from the NSF and organizations like the Association for the Advancement of Artificial Intelligence. These programs should integrate not only technical skills but also foundational STEM education (math, physics, etc.) as well as ethics, systems thinking, and creative problem-solving to cultivate holistic AI fluency.

Finally, to complement workforce development, the strategy should broaden its scope to include national public education initiatives on AI. A coordinated national AI literacy campaign, including public awareness on risks such as synthetic media and deepfakes, would bolster societal preparedness and trust. Accenture’s First AI-ID Kit,^v a deep-fake awareness program deployed across its global workforce and made available to the public, serves as a scalable example of how private-sector leadership can be leveraged for public good.

3. ACCELERATE RESPONSIBLE PRIVATE-SECTOR AI DEPLOYMENT

Adoption of AI across the private sector will increase U.S. companies’ productivity, efficiency and growth and, with it, U.S. competitiveness. Yet, adoption currently is lagging.^{vi}

The private sector plays a central role in building public confidence in AI, but government has a critical role to play in shaping the conditions under which innovation can thrive. The previous plan recognized this dynamic and called for coordinated federal action to foster innovation and trust. The revised strategy should reaffirm that goal and further recommend a federal policy environment that supports responsible adoption through clear standards, targeted guardrails for high-risk applications, and flexibility as technologies evolve. In most cases, existing laws and sectoral regulations can be extended or adapted to accommodate AI. Where necessary, new legislation should be narrowly tailored. Outside these formal legal channels, voluntary compliance with frameworks like the NIST AI Risk Management Framework (AI RMF) should continue to be encouraged.

At the same time, the proliferation of inconsistent state-level legislation poses a significant threat to AI innovation and deployment. In 2024 alone, over 780 state AI-related bills have been proposed or enacted. This patchwork increases compliance costs and legal uncertainty, particularly for small companies and startups, and creates barriers to scale. Additionally, the continued absence of a comprehensive federal privacy framework has led to a fragmented data policy environment, with 19 states already enacting their own privacy laws and another 12 actively considering new legislation. This disjointed landscape imposes significant burdens on firms seeking to responsibly use data for AI

development and training. To address these challenges and unlock AI-driven growth across the private sector, the updated strategy should:

- **Support the development of privacy-preserving compute ecosystems.** In many high-value AI applications, particularly those involving sensitive or regulated datasets, direct access to raw data is impractical or legally constrained. Techniques such as secure multiparty computation, confidential computing, federated learning, and encrypted model training should be supported to enable responsible data use without compromising individual privacy. These points should be newly emphasized.
- **Encourage policy prototyping as a mechanism to foster innovation and guide governance.** While the 2023 strategy emphasized experimentation in AI R&D, the updated plan should extend this support to regulation and compliance. Regulatory sandboxes, industry-specific model governance frameworks, and performance-based contracting provisions can serve as tools to help the private sector modernize operations while maintaining accountability.

4. STRENGTHEN U.S. LEADERSHIP IN GLOBAL AI GOVERNANCE

The United States' long-term leadership in AI will hinge not only on its domestic innovation capacity but also on its ability to shape the global environment in which AI is developed, governed, and deployed. The updated strategy should reaffirm this priority and further emphasize the role of the federal government in advancing U.S. values and technical leadership through global standards-setting bodies.

To reinforce the competitive position of U.S. companies in international markets, the strategy should recommend that the administration:

- **Leverage U.S. convening power and technology diplomacy to promote consistent, interoperable AI standards globally.** U.S. export markets must be governed by frameworks that reflect democratic values, ensure security, and enable fair competition. The administration should actively engage with international standards-setting bodies such as ISO/IEC JTC 1/SC 42, and multilateral forums including the OECD, G7, and Global Partnership on AI (GPAI), to shape global norms around AI security, performance, and reliability, ensuring alignment with and interoperability between those standards and U.S. frameworks such as the NIST AI Risk Management Framework.

ⁱ That response can be found at <https://files.nitrd.gov/90-fr-9088/Accenture-AI-RFI-2025.pdf>.

ⁱⁱ Todd Young and Maggie Hassan, *Upskilling and Retraining Assistance Act of 2023*, S.3296, 118th Cong. (2023), <https://www.congress.gov/bill/118th-congress/senate-bill/3296/text>.

ⁱⁱⁱ National Science Board, *Talent: U.S. and Global STEM Education and Labor Force*, National Science Foundation, <https://ncses.nsf.gov/pubs/nsb20243/talent-u-s-and-global-stem-education-and-labor-force>.

^{iv} University of Florida, "AI Foundations: Preparing Florida's Youth for Ever Evolving 21st Century," *UF News*, August 2023, <https://news.ufl.edu/2023/08/uf-designed-ai-education/>.

^v First AI-ID Kit, "Learn," <https://firstai-idkit.com/learn#meetyourdigitalmaker>.

^{vi} Accenture, *From Compliance to Confidence: Embracing a New Mindset to Advance Responsible AI Maturity*, 2023, <https://www.accenture.com/content/dam/accenture/final/accenture-com/document-3/Accenture-Responsible-AI-From-Compliance-To-Confidence-Report.pdf#zoom=40>.