

# PUBLIC SUBMISSION

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## Submitter Information

**Organization:** National Small Business Association

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## General Comment

Please see attached for the National Small Business Association's comments.

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## Attachments

NSBA Comments on AI R and D Strategic Plan RFI Final

**Docket ID No. NSF-2025-OGC-0001****Comments by the National Small Business Association Re: Request for Information on the Development of a 2025 National Artificial Intelligence (AI) Research and Development (R&D) Strategic Plan**

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The National Small Business Association (NSBA) thanks the Networking and Information Technology Research and Development (NITRD) National Coordination Office (NCO) and the National Science Foundation (NSF) for the opportunity to respond to this request for information on the development of a 2025 National AI R&D Strategic Plan (“Plan”). NSBA is the nation’s oldest small business advocacy organization representing the 70 million owners and employees that make up American small business, championing efforts that foster the growth, strength, and impact of small businesses.

AI is poised to reshape countless industries. Given the outsized role small businesses play in our nation’s broader economy, it is critical that they have access to the resources, training, and policy frameworks necessary to compete in an AI-driven environment. We applaud NSF’s past support for democratizing AI research resources, education and workforce development, and partnerships to accelerate AI progress.<sup>1</sup> Going forward, NSBA urges NITRD NCO and NSF, in developing the Plan, to support AI R&D grants or subsidies designated specifically for small businesses, open access to public datasets and compute resources, and partnerships with vocational institutes tailored for employees of small businesses.

**Supporting Small Innovators Engaged in AI R&D**

NSBA appreciates NSF’s commitment to funding startups and small businesses. According to NSF, its funded startups and small businesses “saw around 300 exits and more than \$20 billion in private investments during fiscal years 2016 to 2024.”<sup>2</sup> Not only do we support NSF’s continued commitment to providing funding directly to startups and small businesses, but we also encourage NSF to collaborate with the Small Business Administration (SBA) to support the infrastructure necessary to bolster small innovators. In 2024, George Mason University was awarded a \$1 million grant “to establish the nation’s first Center for AI Innovation for Economic

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<sup>1</sup> U.S. National Science Foundation, “Artificial Intelligence,” <https://www.nsf.gov/focus-areas/artificial-intelligence#what-we-support-39b>.

<sup>2</sup> America’s Seed Fund, U.S. National Science Foundation, “What We Fund,” <https://seedfund.nsf.gov/what-we-fund/>.

Competitiveness (CAIIEC),” directed through SBA.<sup>3</sup> To build on this investment, NSF and SBA should work with Congress to explore avenues through which joint funding ventures can be authorized.

### **Providing Access to Public Research Resources**

As we discussed in our response to NSF and NITRD NCO’s previous RFI on the development of an AI action plan, NSBA believes that a level playing field for AI innovation – which ensures that small businesses have meaningful access to the same resources, computing power, and data as larger corporations – is critical to solidifying the U.S. as the global leader in AI. The National Artificial Intelligence Research Resource (NAIRR) is one such engine to facilitate increased access to cutting-edge AI research.

We applaud NSF for its leadership in the NAIRR pilot and urge NSF and NITRD NCO to work with Congress to make the pilot permanent beyond its January 24, 2026, expiration date. If made permanent and properly resourced, the NAIRR can be fully realized as a foundation for a “national [AI] infrastructure,” one can dismantle cost barriers for small firms engaged in AI R&D.<sup>4</sup>

### **Bolstering Workforce Readiness for Small Innovators**

As we also discussed in our response to NSF and NITRD NCO’s previous RFI on the development of an AI action plan, NSBA is committed to addressing the workforce challenges that the U.S. already faces, particularly as new and emerging technologies like AI become cornerstones of the economy. As such, we urge the Trump administration to foster collaboration between innovation-focused agencies like NSF and the Department of Labor (DOL) “to leverage authorities and financial incentives to increase participation in AI-related apprenticeships”<sup>5</sup> pursuant to President Trump’s executive order entitled “Advancing Artificial Intelligence Education for American Youth.”<sup>6</sup>

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<sup>3</sup> George Mason University, “George Mason to Launch Nation’s First Center for Small Business AI Innovation with \$1M Grant,” Jun 2024, <https://www.gmu.edu/news/2024-06/george-mason-launch-nations-first-center-small-business-ai-innovation-1m-grant>.

<sup>4</sup> U.S. National Science Foundation, “National Artificial Intelligence Research Resource Pilot,” <https://www.nsf.gov/focus-areas/artificial-intelligence/nairr>.

<sup>5</sup> The White House, “Fact Sheet: President Donald J. Trump Advances AI Education for American Youth,” Apr 2025, <https://www.whitehouse.gov/fact-sheets/2025/04/fact-sheet-president-donald-j-trump-advances-ai-education-for-american-youth/>.

<sup>6</sup> The White House, “Advancing Artificial Intelligence Education for American Youth,” Apr 2025, <https://www.whitehouse.gov/presidential-actions/2025/04/advancing-artificial-intelligence-education-for-american-youth/>.

NSBA further encourages NSF and NITRD NCO, in collaboration with DOL, to consider ways to expand programs and partnerships like the National Applied Artificial Intelligence Consortium (NAAIC), which is working to scale access and improve the quality of AI and workforce training at community colleges.<sup>7</sup> We also note the strong potential of NSF’s EducateAI Initiative, the purpose of which was outlined in a 2023 Dear Colleague Letter (DCL), to support “professional learning opportunities & communities” with the goal of “develop[ing] the next generation of talent” for an AI workforce.<sup>8</sup> As NSBA recommended in its AI action plan comments, programs like the NAAIC and EducateAI should enlist industry stakeholders, including small business, and support learning opportunities targeted towards small and lesser-resourced companies.

### **Conclusion**

NSBA stands ready to help secure the U.S. as the preeminent global leader on AI, which necessarily includes robust R&D plans. We urge the administration, in crafting its plan, to consider these recommendations that will not only benefit small businesses and innovators but will also bolster the larger innovation economy.

Thank you again for the opportunity to comment on this request. Please do not hesitate to reach out if you have any questions.

Sincerely,

Rachel C. Grey

Director of Research & Regulatory Policy, NSBA

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<sup>7</sup> Shalin Jyotishi, “Community Colleges Unite to Scale AI Workforce Education,” New America, Aug 2024, <https://www.newamerica.org/education-policy/edcentral/community-colleges-unite-to-scale-ai-workforce-education/>.

<sup>8</sup> U.S. National Science Foundation, “Advancing Education for the Future AI Workforce (EducateAI),” Dec 2023, <https://www.nsf.gov/funding/opportunities/dcl-advancing-education-future-ai-workforce-educateai/nsf24-025>.