

National Small Business Association

Re: “Request for Information: Development of an Artificial Intelligence Action Plan”

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The National Small Business Association (NSBA) thanks the Office of Science and Technology Policy (OSTP), 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 an artificial intelligence (AI) action 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.¹ Going forward, NSBA urges OSTP, NITRD NCO, and NSF, in developing the Plan, to not only bolster support for these three critical areas, but also to consider flexible solutions to AI policy issues that may arise down the road.

Ensuring Widespread Availability of AI Research Resources

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, OSTP, and NITRD NCO to work with lawmakers to make the pilot permanent beyond its January 24, 2026 expiration date. If made permanent and properly resourced,

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

the NAIRR can be fully realized as a foundation for a “national [AI] infrastructure,” one that is shared by small and large companies alike.²

Expanding Workforce and Training Programs for an AI-driven Economy

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 encourage NSF, OSTP, and NITRD NCO 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.³ NSBA also strongly supports NSF’s EducateAI Initiative, the purpose of which was outlined in a 2023 Dear Colleague Letter (DCL). In the DCL, NSF offered its support for, among other things, “professional learning opportunities & communities” with the goal of “develop[ing] the next generation of talent” for an AI workforce.⁴ Programs like the NAAIC and EducateAI should enlist industry stakeholders, including small business, and support learning opportunities targeted towards small and lesser-resourced companies.

Supporting Small Business Through Collaborations with Their Larger Counterparts

AI innovation is often concentrated in well-funded tech giants, leaving small businesses at a disadvantage. NSBA believes that NSF, OSTP, and NITRD NCO must work with both large and small businesses alike to secure U.S. AI leadership. We support collaborations between small businesses and larger players including (but not limited to) external AI innovators, cloud providers, and research institutions. If incentivized by policies that encourage such collaborations, smaller players will gain increased access to cutting-edge technology without having to wholly absorb costs.⁵

Addressing Future Challenges Related to AI

² U.S. National Science Foundation, “National Artificial Intelligence Research Resource Pilot,” <https://www.nsf.gov/focus-areas/artificial-intelligence/nairr>.

³ Shalin Jyotishi, “Community Colleges Unite to Scale AI Workforce Education,” New America, Aug 2025, <https://www.newamerica.org/education-policy/edcentral/community-colleges-unite-to-scale-ai-workforce-education/>.

⁴ 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>.

⁵ Karan Sachdeva, “How Strategic Partnerships Transform the Way Businesses Adopt and Scale AI,” IBM, Oct 2024, <https://www.ibm.com/think/insights/how-strategic-partnerships-transform-the-way-businesses-adopt-and-scale-ai>.

As AI evolves, so too will the policy questions that accompany this evolution. NSBA urges the Trump administration to remain flexible in addressing these future questions, while also working to implement a regulatory framework that provides much-needed certainty and predictability. Future considerations pertinent to small business may include:

- Implementing a risk-based regulatory framework for AI that provides appropriate flexibility for small companies;
- How to best protect small innovators' intellectual property (IP) rights; and
- Ensuring that the Small Business Administration (SBA) is armed with the tools it needs to provide guidance, technical assistance, and financial resources for small businesses as they continue to adopt AI.

Thank you again for the opportunity to comment on this request, which will help secure the U.S. as the preeminent global leader on AI. Please do not hesitate to reach out to rgrey@nsbaadvocate.org if you have any questions.

Sincerely,

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