



March 14, 2025

**Submitted via Email to:** [ostp-ai-rfi@nitrd.gov](mailto:ostp-ai-rfi@nitrd.gov)

National Science Foundation (NSF), Networking and Information Technology Research and Development (NITRD) National Coordination Office (NCO)

2415 Eisenhower Ave.

Alexandria, VA 22314

Attention: Faisal D'Souza, Technical Coordinator, NITRD NCO

**RE: Request for Information – Development of an Artificial Intelligence Action Plan**

Dear Mr. D'Souza:

We write to offer comments in response to the “Request for Information (RFI) – Development of an Artificial Intelligence Action Plan,” which was published in the Federal Register on February 6, 2025. [[90 FR 9088](#)].

COGR is the national authority on federal policies and regulations affecting U.S. research institutions. We provide a unified voice for over 225 research universities and affiliated academic medical centers and research institutes. Our work strengthens the research partnership between the federal government and research institutions and furthers the frontiers of science, technology, and knowledge. We advocate for effective and efficient research policies and regulations that maximize and safeguard research investments and minimize administrative and cost burdens.

In the RFI, NSF NITRD NCO, on behalf of the Office of Science and Technology Policy (OSTP), invites comments on the “highest priority policy actions that should be [included] in the new Artificial Intelligence (AI) Action Plan” to be developed pursuant to [Executive Order 14179, Removing Barriers to American Leadership in Artificial Intelligence](#). Although we do not presently have comments regarding the technical aspects of the AI Action Plan, we offer recommendations regarding the Action Plan’s overarching approach.

A key factor to ensuring American AI leadership is the development of federal policy that fully empowers and facilitates the ability of U.S. academic research institutions to conduct research activities concerning all aspects of AI – technical, social, and ethical. One important action that OSTP can take to help achieve this crucial goal is to ensure that any AI Action Plan incorporates a requirement for clear, consistent, and harmonized regulations, policies, and guidance across all federal agencies that intend to regulate research on AI or the use of AI in research activities. Such cross-agency consistency will promote more effective and efficient compliance by enabling institutions to develop unified policies, processes, systems, and training.

Additionally, the AI Action Plan should ensure that regulatory requirements are tailored to address specific, identified risks. Employing this calibrated risk-based approach will help to avoid unnecessarily burdensome regulation that can hamper efforts to use and study AI.

We appreciate the opportunity to comment on this RFI. Should you have any questions regarding these comments, please contact me or Kristin West, COGR's Director of Research Ethics and Compliance at [kwest@cogr.edu](mailto:kwest@cogr.edu).

Sincerely,

A handwritten signature in blue ink that reads "M. Owens". The signature is fluid and cursive, with the first name "M." and the last name "Owens" clearly visible.

Matt Owens  
President