August 20, 2025

Submitted via Regulations.gov

Tracey St. Pierre
Director, Office of the Executive Secretariat, Office of the Secretary
U.S. Department of Education
400 Maryland Ave SW
Washington, DC 20202

RE: ED-2025-OS-0118; *Proposed Priority and Definitions – Secretary's Supplemental Priority and Definitions on Advancing Artificial Intelligence in Education*

Dear Ms. St. Pierre:

On behalf of the more than three million members of the National Education Association (NEA), we appreciate the opportunity and submit the following response to the U.S. Department of Education's proposed supplemental priority and definitions on *Advancing Artificial Intelligence (AI) in Education*. We share the Department's recognition that AI will continue to play an increasingly influential role in K12 and higher education, and we support the responsible integration of AI technologies into teaching and learning environments across the country.

Our comments draw from the work of our member-led task force, including the *Report of the NEA Task Force on Artificial Intelligence in Education* and the NEA *Policy Statement on the Use of Artificial Intelligence in Education*. Through this work, the NEA outlines five principles for the use of AI in education that often align with the Department's vision. We offer both general recommendations on the priority and specific feedback on the proposed definitions to ensure federal policy fosters AI adoption that is equitable, ethical, evidence-based, and educator-led.

Comments on the Proposed Priority: Advancing Artificial Intelligence in Education

The Department proposes a priority for projects that expand AI literacy, integrate AI into curriculum, and support AI-enable instruction, among other things. The NEA supports the overall aim but offers some key considerations:

1. Keep Students and Educators at the Center of Education

The Department's priority should clearly state that AI is to aid and not replace human educators. The first principle in the NEA policy statement stresses that the relationship between students and educators is irreplaceable and central to student success. Any federal guidance should be explicit that

AI cannot serve as the primary form of education, nor serve as the sole factor in high-stakes decisions, including student assessment, graduation, discipline, or educator evaluation.

We recommend that language be added to require that federally funded projects demonstrate meaningful educator involvement in design, implementation, and evaluation. It is critical that educators be engaged from the onset of projects to ensure tools meet real classroom needs.

2. Require Evidence Before and During Implementation of Tools

While the proposed priority encourages "building evidence," the NEA encourages going a step further to require evidence prior to any broad deployment. This evidence should come either from research conducted and reviewed by independent researchers or from industry-sponsored research that adheres to the same standards of methodology and peer review as independent research. If such research is unavailable, AI should only be adopted on a pilot or trial basis if the evidence is being collected and analyzed in a timely manner, with an agreement in place to cease the use of these technologies if the results of the research do not show the intended benefits or do not serve educational goals. We urge the Department to require that all AI tools be:

- Evaluated for accessibility, including compliance with Universal Design for Learning (UDL) principles;
- Reviewed for equity, particularly for historically underserved populations; and
- Regularly reassessed to ensure benefits persist and no unanticipated harms emerge.

3. Address Ethical Risks

The Department's priority reference instructions about how to use AI responsibly, but the NEA believes there are several areas that should be addressed more explicitly. These include:

- Strong data protection practices with clear limits on data collection, transparency in its use, and protection of educator and student proprietary rights;
- Systems for mitigating bias;
- Clear prohibition of surveillance AI that enables constant monitoring or profiling of students and educators without consent; and
- Consideration of the environmental impact and energy costs of AI infrastructure.

Including these safeguards explicitly in the priority will ensure that AI funding does not support tools that undermine equity, privacy, or sustainability.

4. Incorporate AI Literacy Across Curricula

The NEA wants to emphasize that AI literacy should not be confined to computer science or technology courses alone. As AI increasingly shapes access to information and problem-solving across disciplines, students need opportunities to critically engage with AI tools in all subject areas. Appropriately embedding AI literacy broadly will ensure all students, regardless of what courses they are taking, develop the academic, cognitive, and social emotional skills and agency to navigate AI in their personal and professional lives.

Comments on Proposed Definitions

The Department proposes definitions for "Artificial Intelligence," "AI Literacy," and "Computer Science." The NEA appreciates the clarity these provide but recommends some changes to reflect educator experiences and classroom realities.

1. Artificial Intelligence

The Department's adoption of the statutory definition found in 15 U.S.C. 9401(3) is sound and is in line with NEA's own definition of artificial intelligence, "Machine-based systems designed around human-defined objectives to perform tasks that would otherwise require human or animal intelligence." That said, we do see an opportunity for the Department to broaden the scope of the definition used in educational contexts to also acknowledge the inherent limitations of AI.

2. Artificial Intelligence Literacy

The NEA supports defining AI literacy as encompassing technical knowledge, durable skills, and future-ready attitudes. The fifth principle of our policy statement emphasizes the importance of AI literacy and agency, including the ability to critically evaluate AI tools and understand their limitations. The NEA recommends adding that AI literacy should:

- Include knowledge of AI ethics and bias;
- Foster critical thinking about AI's role in society; and
- Be developmentally appropriate and accessible to learners of all backgrounds.

The NEA's definition from our report reads, "Understanding what it means to learn with and about AI while gaining specific knowledge about how artificial intelligence works, the skills necessary to master AI tools, and how to critically navigate the benefits and risks of this technology."

3. Computer Science

The proposed definition is strong, but the NEA recommends clarifying that computer science education should be inclusive and accessible, connect explicitly to real-world applications, and be taught by qualified educators with access to ongoing professional learning opportunities.

Conclusion

The NEA believes that AI can transform education for the better when implemented with care, evidence, and meaningful educator involvement. The Department's proposed supplemental priority and definitions are an important step in that direction, but their impact will depend on embedding strong safeguards and clear expectations for human oversight.

The NEA respectfully submits the above comments for consideration in response to this request for information regarding the Department's proposed priority on advancing AI in education. Please do not hesitate to contact me or Justin Thompson at JThompson@nea.org should you have any questions.

Sincerely,

Daaiyah Bilal-Threats
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National Education Association