

August 20, 2025

Zachary Rogers U.S. Department of Education 400 Maryland Avenue SW Washington, DC 20202-6450

Dear Mr. Rogers,

I am writing to provide comments on the <u>notice</u> of *Proposed Priority and Definitions: Secretary's Supplemental Priority and Definitions on Advancing Artificial Intelligence in Education* as published by the U.S. Department of Education (ED) on July 21. <u>Knowledge Alliance</u>, a non-profit, non-partisan organization, is comprised of leading education organizations committed since 1971 to the greater use of high-quality and relevant data, research, evaluation, and innovation in education policy and practice at all levels. Collectively, KA and its members promote the use of rigorous research to figure out what works to improve student outcomes and empower schools, districts, and all 50 States with the tools and resources needed to improve learning and outcomes for every student.

We appreciate ED's leadership in developing a supplemental priority on artificial intelligence (AI) in education. As AI becomes increasingly utilized by teachers and students and AI tools are integrated into classrooms, it is critical that ED help SEAs and LEAs implement AI with a commitment to evidence-based practice, safe and secure use of data and continuous improvement.

KA offers the following recommendations:

Include a provision for research, development, and evaluation of AI use and integration in schools. Federal priorities should explicitly support rigorous, ongoing evaluation to assess the effectiveness and implementation challenges of AI in teaching, learning and school operations in order to drive student achievement. We recommend including the following language under priority (a):

(xi) Evaluates methods of integrating AI into education.

Recognize and Support the State Role in AI Oversight and Implementation. States will play a critical role in monitoring AI integration in schools to ensure compliance with privacy, accessibility and quality standards. ED should prioritize targeted funding for SEAs and LEAs to support technical assistance (TA) to help them produce guidance. This work should include TA on safe and effective AI implementation in schools, support the development of clear oversight frameworks and share best practices for AI governance. ED can strengthen this work by leveraging existing Federal infrastructure—such as the Regional Educational Laboratories (RELs) and Comprehensive Centers (CCs)—to serve as a "bridge of support" for States and districts. These programs are uniquely positioned to provide technical assistance on evidence-based practices, facilitate evaluation of AI tools in real-world contexts, and guide continuous improvement so that AI implementation is effective, and responsive to local need and

implemented in a way that is tailored to each State and districts unique context. We recommend including the following language under priority (a):

(xii) Support technical assistance for SEAs and LEAs in integrating AI into education.

Promote AI-Enabled Evidence Uptake and Dissemination. ED should consider funding projects such as a proposal to integrate an AI chatbot into the What Works Clearinghouse which would allow a teacher to access proven strategies and interventions and get clear, actionable, evidence-based guidance in seconds. Prioritizing and funding integration of these tools can transform evidence into a dynamic, real-time support system, giving teachers, parents and school leaders access to timely, relevant data they can immediately apply to improve student outcomes. We recommend including the following language under priority (b):

(x) AI tools that promote educator and school leader access to evidence and support evidence use and uptake.

Al has the potential to transform our education system into one where teachers, students and families have real-time access to high-quality information, tailored supports and innovative tools that meet learners where they are. If guided by rigorous evidence, grounded in continuous improvement and evaluation, and safeguarded by strong data privacy and security protections, Al can help unlock new possibilities for teaching and learning. We appreciate ED's thoughtful leadership to ensure Al becomes a trusted partner in advancing improving outcomes for students.

Thank you for the opportunity to provide the comments of Knowledge Alliance on this important priority. Please reach out to me at rdinkes@knowledgeall.net with any questions.

Sincerely,

Rachel Dinkes

achel Dinkes

President & CEO