August 8, 2025

The Honorable Linda McMahon
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Re: Proposed Priority on Advancing Artificial Intelligence in Education (Docket ID ED–2025–OS–0118)

Dear Secretary McMahon:

The Consortium for School Networking (CoSN) welcomes the opportunity to submit comments on the U.S. Department of Education's proposed supplemental priority on Advancing Artificial Intelligence (AI) in Education.

CoSN is a leading professional association for K–12 education technology leaders and stands at the forefront of education innovation. Our mission is to equip current and aspiring K–12 EdTech leaders, their teams, and school districts with the community, knowledge, and professional development they need to cultivate engaging learning environments. Guided by a vision where every learner reaches their unique potential, CoSN represents over 2,050 school districts serving more than 11 million students.

This comment reflects extensive input from our national AI in Education Committee and the broader CoSN membership. We support the Department's efforts to promote responsible and inclusive uses of AI in education and offer the following comments and recommendations.

Adhere to Community Principles for AI Use

CoSN supports the proposed priority's emphasis on educator training, AI literacy, and instructional integration. These goals align closely with the *TeachAI Principles*, which CoSN helped develop in partnership with leading education organizations. We encourage the

Department to explicitly reference these principles in final guidance to ensure that AI is implemented in ways that advance access, preserve trust, and support learning:

- **Purpose** – Use AI to help all students achieve their educational goals.

- **Compliance** – Ensure alignment with student privacy laws and district procurement policies.

- **Knowledge** – Promote AI literacy for educators, other personnel. and students across disciplines.

- **Balance** – Realize AI's benefits while proactively addressing risks, such as bias and misinformation.

- **Integrity** – Preserve academic integrity through clear expectations and professional development.

Key Concerns from School District Technology Leaders

Based on member input, CoSN offers the following recommendations for strengthening the proposed AI priority and ensuring effective implementation through future discretionary grant competitions:

- **Student and Personnel Data Privacy**: District leaders strongly support federal efforts to expand AI-related learning opportunities but also emphasize the urgent need for clear federal guidance on safeguarding student and personnel data, including preventing cyberattacks. The Department should consider how this priority can help school districts satisfy the requirements of the Family Educational Rights and Privacy Act (FERPA), the Children's Online Privacy Protection Act (COPPA), and other laws when implementing AI tools in the classroom and beyond.

- **Sustainable Funding**: While CoSN supports the proposed supplemental priority as a strong signal to the field about the importance of AI, the Department should consider establishing a dedicated funding stream for AI-related tools, infrastructure, and professional development to ensure long-term sustainability and avoid reducing support for other critical programs.

- **Professional Development and Training**: Discretionary grant programs that support professional learning for educators and other school district personnel (e.g.,

procurement, information technology, and other operational staff) should include an emphasis on how to integrate AI into instructional design and how to teach students about the use, limitations, and ethical implications of AI tools. Educators must be prepared not only to use AI efficiently but to guide students in learning with and about AI.

- **Access and Infrastructure**: To ensure effective implementations for all students, the Department should use the proposed supplemental priority to help close digital divides that affect students' access to AI-enabled learning. This work should include providing resources that help districts address broadband access, connected device availability, and AI integration into other local digital infrastructure—particularly in high-poverty districts.

- **Tool Vetting and Evaluation**: The supplemental priority should contribute to establishing more consistent vetting processes for AI tools used in schools. Related to this proposed priority, the Department should also consider developing or endorsing an evaluation framework that helps grant recipients assess tools for data privacy safety, evidence-based practices, accessibility/inclusivity, usability, and interoperability.

Recommendations for Strengthening the Supplemental Priority

In addition to the concerns outlined above, CoSN offers the following recommendations for improving the final supplemental priority:

- **Avoid Redundancy and Overload**: To avoid overwhelming educators, the priority should emphasize the value of integrating AI learning into existing instructional routines and academic standards, not implemented as a separate or additional requirement. This approach will increase adoption and reduce burden on already stretched teaching staff.

- **Support for Cross-Sector Collaboration**: School district leaders are navigating evolving expectations from higher education and the workforce sector. We encourage the Department to support partnerships between school systems, teacher preparation programs, and postsecondary institutions to align K–12 AI education with broader state and national goals.

- **Human-Centered Design**: Teachers must remain central to instruction, even as AI is integrated into classroom practices. The supplemental priority should strongly emphasize AI use that enhances human judgment, encourages authentic learning, and

strengthens teacher-student relationships.

- **Evidence-Based Guidance and Guardrails**: The Department should consider issuing additional implementation guidance and model policies to support safe and responsible AI adoption. Such guidance should be vendor-agnostic, infrastructure-neutral, and adaptable to a variety of district sizes and contexts.

Conclusion

CoSN appreciates the Department's leadership in proposing a supplemental priority on AI in education and encourages the Department to finalize this priority in a way that reflects the *TeachAI Principles*, addresses practical implementation needs, and references the tools and guidance school districts require to build responsible AI strategies.

Please contact us if you have questions or if we can support the Department's continued work in this area.

Sincerely,
Keith Krueger

Keith Krueger, CEO
Consortium for School Networking (CoSN)