August 6, 2025

The Honorable Linda McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW 2nd Floor
Washington, DC 20202

RE: Docket IDED-2025-OS-0118; Proposed Priority and Definitions—Secretary's Supplemental Priority and Definitions of Advancing Artificial Intelligence in Education

Dear Secretary McMahon,

This comment is on behalf of the members of WCET (the WICHE Cooperative for Educational Technologies). We are a nationwide organization housed within the Western Interstate Commission for Higher Education (WICHE), dedicated to serving our postsecondary institution members by providing guidance and support for understanding digital learning regulatory requirements and emerging best practices. Our members, representing postsecondary institutions as well as organizations, corporations, and state agencies from across the United States, support the development of innovative educational opportunities to advance learner access and success.

We appreciate this opportunity to provide public comment on the proposed priority and definitions for the Secretary's supplemental priority and definitions of advancing artificial intelligence in education. We concur with the Department's assessment that "it is increasingly important for students to develop AI literacy" and that "AI also offers powerful opportunities to enhance teaching and learning." We believe that AI, more than any other technology, has the potential to critically alter education as we know it. And because of that potential, we believe that any incorporation of AI into education should be undertaken in a deliberate and thoughtful manner.

We are especially supportive of the Department's intention in (a)(i) to "Support the integration of AI literacy skills and concepts into teaching and learning practices to improve educational outcomes for students, including how to detect AI generated disinformation and misinformation." We are also supportive of the expansion of AI and computer science courses into an institution of higher education's general education curriculum found in (a)(iii). We believe that the most effective AI education is one that is integrated across an institution's curriculum and not siloed. And we believe that it is essential that teachers at all levels of the educational system understand AI and how to effectively leverage it to improve learner access and success, which makes the professional development of pre-service and in-service instructors in (a)(iv-vi) especially important. We are also pleased to see the Department acknowledge and encourage the use of AI to assist students with disabilities in (b)(iii). Finally, we concur with the Department as expressed in (b)(viii) that AI can reduce time-intensive administrative tasks so that instructors can redirect that time to providing students with personalized direct instruction and assistance.

We would urge the Department, however, to make two critical amendments to its description of computer science courses and its proposed definitions of artificial intelligence.

- In its description of computer science courses, the Department specifically calls out core concepts such as algorithms, data analysis, and computational thinking. We urge the Department to also include algorithmic bias as a foundational concept. The ways in which societal biases of all types are replicated in the outputs of artificial intelligence are well-established, and students need to understand how such biases are created as well as identify when those biases are present.
- Although we are generally supportive of the Department's proposed definition of artificial intelligence, we propose the following changes in bold: *"Artificial intelligence (AI)* **literacies** *mean the interconnected technical knowledge, durable skills, and future ready mindsets required to thrive in a world influenced by AI.* **They** *enable learners to engage, create with, manage, and design AI while critically evaluating its benefits* **and** *risks,* **as well as its ethical, social, political, economic, and cultural** *implications."* We believe, in accordance with the scholarship of experts such as Gunder (https://openedculture.org/projects/dimensions-of-ai-literacies/) that it is more accurate to describe AI literacy as a plurality of literacies that operate on a continuum rather than dichotomously. We also believe that it is important to underscore the critical implications of AI by specifically calling out those implications.

We thank the U.S. Department of Education for this opportunity to share our comments on behalf of WCET members. WCET member institutions wish to provide quality learning opportunities and support students in innovative ways, including leveraging the power of artificial intelligence.

WCET intends to provide communication, guidance, and support for the Secretary's focus on artificial intelligence. We would be very pleased to offer further assistance to the Department of Education and to assist with communications to institutions.

Thank you,

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