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Organization: EdGenerative

General Comment

Public Comment: National AI R&D Strategic Plan Update (2025)

Submitted by: Dr. Aviva Legatt, Founder of EdGenerative

Subject: Recommendation to Prioritize Reflexive Intelligence Frameworks and Human-Centered AI Governance in Education

As the founder of EdGenerative, a consultancy and national movement helping educational institutions develop ethical, human-centered AI strategies, I respectfully submit this comment in response to the NSF's request for public input on the 2025 National AI R&D Strategic Plan.

The Strategic Plan update presents an opportunity to reshape not only the direction of U.S. AI R&D, but also its long-term societal impact. My recommendation is to prioritize research and deployment of governance frameworks that foster Reflexive Intelligence in institutions, particularly in the education sector.

Reflexive Intelligence: A Strategic Priority

Reflexive Intelligence is the capacity of individuals and institutions to ethically evolve their AI-related policies, practices, and cultural norms in response to changing technology. In contrast to rigid, compliance-driven approaches, Reflexive Intelligence promotes:

Ethical adaptability: Creating policies that evolve alongside generative and agentic AI capabilities and risks

Human-centered iteration: Grounding governance in the values of transparency, equity, and institutional mission

Shared agency: Empowering educators, administrators, and students to participate in shaping AI use norms

This model addresses a key gap in the current institutional response to AI: most AI governance in education remains reactive, narrow in scope (e.g., plagiarism-only policies), and siloed. Reflexive Intelligence offers a dynamic and scalable alternative.

Application in Education: A National Imperative

Recent national surveys and pilot programs highlight urgent needs:

Over 90% of students use generative AI, yet fewer than 40% of institutions have formal AI use policies (EDUCAUSE, 2024).

Students who use AI with some human oversight experience 17% less academic stress and burnout (Adobe, 2025).

These data underscore a critical truth: AI alone cannot meet the complex human, emotional, and ethical needs of learners. But when paired with intentional design and human relationships, AI can be a powerful catalyst for access, equity, and wellbeing.

Recommendations for Strategic Plan Inclusion

that elevate—not erase—our humanity.

By embedding Reflexive Intelligence as a cornerstone of institutional governance, the Strategic Plan can empower education systems to build public trust, safeguard well-being, and adapt

To ensure that U.S. institutions are both globally competitive and socially responsive in the AI era, I recommend that the 2025 AI R&D Strategic Plan include:

Dedicated investment in Reflexive Intelligence frameworks that model iterative, human-centered AI governance in education and public institutions.

Research and pilot funding for hybrid models of AI implementation that include human-in-the-loop design in teaching, advising, and student services.

Cross-sector collaboration initiatives that bridge AI developers, educators, and policymakers to co-create dynamic governance tools.

Development of institutional toolkits (e.g., AI readiness assessments, policy blueprints, stakeholder training modules) to translate high-level ethics into day-to-day practice.

Closing

If the U.S. is to lead in AI not only technologically but ethically, we must fund and prioritize innovations wisely to a rapidly evolving landscape.

Respectfully submitted,

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