

PUBLIC SUBMISSION

Received: May 29, 2025 Tracking No. nb9-fmsa-uv1o Comments Due: May 28, 2025 Submission Type: Web
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Docket: NSF-2025-OGC-0001
NITRD_FRDOC_0001

Comment On: NSF-2025-OGC-0001-0001
Request for Information: Development of a 2025 National Artificial Intelligence Research and Development Strategic Plan

Document: NSF-2025-OGC-0001-DRAFT-0180
Comment on FR Doc # 2025-07332

Submitter Information

Organization: Aurora Institute and The Learning Accelerator

General Comment

See attached file(s)

Attachments

Comments on AI Research and Development Plan

Comments of the Aurora Institute and The Learning Accelerator Responding to the Networking and Information Technology Research and Development (NITRD) National Coordination Office (NCO) Request for Information on How to Update the National Artificial Intelligence Research and Development Strategic Plan

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Introduction

The Aurora Institute (Aurora) and The Learning Accelerator (TLA) appreciate the opportunity to submit comments on the Networking and Information Technology Research and Development (NTRD) National Coordination Office's (NCO) request for information on how to update the previous administration's National Artificial Intelligence (AI) Research and Development Strategic Plan (Strategic Plan). Education is foundational to national strength, economic resilience, and individual opportunity. As the United States advances its leadership in artificial intelligence, it must also ensure that AI meaningfully supports the public education system, an essential lever for innovation and human flourishing. As national nonprofits working to drive the transformation of K-12 education systems and accelerate the advancement of breakthrough policies and practices, we see opportunities for AI to empower educators and enhance learning experiences for students when used safely and effectively. We commend the NTRD NCO for spearheading this effort, which we are confident will have a wide-ranging impact on AI research and development and positively impact the education sector.

Today's students are tomorrow's AI creators, users, and citizens. To realize AI's full potential for national competitiveness and democratic vitality, we must invest in AI research and development that directly improves educational systems. This includes enabling more effective, inclusive teaching; supporting student agency and lifelong learning; and preparing all learners, regardless of geography or background, to thrive in an AI-powered world. AI research and development should go beyond automating existing systems to support deeper learning, student-centered instruction, and pedagogical transformation.

The current version of the Strategic Plan includes important strategies for responsibly developing AI. As organizations dedicated to K-12 education, our recommendations focus on the use of AI in our education system specifically, though many build on themes already articulated in the plan. As you update the Strategic Plan, we encourage you to include an explicit focus on education and consider the following recommendations.

INVEST IN HUMAN-CENTRIC APPROACHES

Recommendations: AI should empower teachers and other educators by reducing tasks that take time away from instruction, so teachers have more time to engage directly with students. Building off Strategy 2 in the current plan, the Strategic Plan should acknowledge the vital importance of ensuring humans are in the loop and invest in research that helps AI support human teaching—e.g., formative feedback, personalization, content generation—without displacing educator judgment.

ENSURE AI-ENABLED TOOLS AND RESOURCES SERVE ALL STUDENTS

Recommendations: Ensuring educational resources are free from bias is essential for their effective use. Federal leadership is needed to fund AI tools and research that address systemic shortcomings, prevent algorithmic bias, and reflect the needs of all learners and communities. The Strategic Plan should encourage the development of guidance and lessons learned about how to do this effectively. In setting research priorities, it will be helpful to engage with and elevate the voices of educators and students of all groups.

FOSTER RESEARCH-PRACTICE-POLICY PARTNERSHIPS

Recommendations: Research must effectively inform practice and vice versa. This will require incentivizing field-based innovation networks where states, districts, researchers, and developers co-create and test AI tools in real classrooms as well as encouraging collaboration between state education agencies, local education agencies, and researchers to build evidence and connect policy with practice. The Strategic Plan could highlight existing examples of scalable infrastructure for this type of work like TLA's [School Teams AI Collaborative](#).

INVEST IN AI LITERACY FOR EDUCATORS AND STUDENTS

Recommendations: The Trump Administration's Executive Order Advancing Artificial Intelligence Education for American Youth highlights the need to teach students and educators how to use AI effectively. Building off Strategy 7 in the current plan, the Strategic Plan should encourage investment in AI literacy research and development that supports educator training, student critical thinking, and workforce preparation. The Strategic Plan can also encourage research on instructional models that teach AI ethics, prompt design, and safe tool use across K-12.

STRENGTHEN EVALUATION AND EVIDENCE INFRASTRUCTURE

Recommendations: Understanding the positive and negative impacts of AI in education systems is essential for leveraging its use and protecting against any potential harm. The Strategic Plan should encourage investment in research that develops shared metrics,

evaluation frameworks, and impact studies for AI in education. It can also prioritize longitudinal and mixed-method research across contexts, focusing on learning outcomes and teacher efficacy and encourage research that measures both long-term student outcomes (e.g., progress in traditional academic measures) and more proximate outcomes specific to AI implementation. The Strategic Plan can encourage research about the ways that AI can create new types of evaluation and evidence infrastructure to deepen understanding of student learning within more innovative, competency-based learning environments.

ENSURE PRIVACY, SAFETY AND ACCESS TO AI

Recommendations: Access to technology is no longer an optional part of a student's educational experience. The Strategic Plan should encourage investment in privacy, interoperability, procurement, and implementation research to support safe and scalable AI integration in schools. It can also explore policy frameworks that help public education systems adopt AI responsibly and equitably. Building off Strategy 3 in the current plan, the updated plan can encourage investment in privacy research to support safe and scalable AI integration in schools.

CONCLUSION

Federal research and development leadership in the use of AI in education is not just necessary but urgent. The private sector alone will not prioritize the complex, systemic needs of public education. Without coordinated investment and guidance, AI development risks deepening educational inequities, reinforcing outdated instructional models, and excluding public schools from the benefits of technological innovation. We strongly encourage education to be a central focus of the Strategic Plan.

We appreciate the opportunity to provide input as part of your process. If you have questions or you would like to discuss these comments, please do not hesitate to contact us.

Sincerely,

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