



Comments of Houghton Mifflin Harcourt Responding to the National Science Foundation's Request for Information on the Development of an Artificial Intelligence Action Plan

Introduction

Houghton Mifflin Harcourt (HMH) appreciates the opportunity to submit comments on the National Science Foundation's (NSF) Request for Information (90 Fed. Reg. 9088, Feb. 6, 2025) regarding the development of a federal Artificial Intelligence (AI) Action Plan. As a leading provider of educational content, technology, and services, HMH has been at the forefront of integrating AI into education to unlock student potential, empower educators, and support economic competitiveness. We commend the NSF and the Office of Science and Technology Policy (OSTP) for spearheading this initiative, which we are confident will have a wide-ranging impact on AI development and deployment across the education sector.

As you develop NSF/OSTP AI Action Plan, HMH encourages you to consider the following policy recommendations that aim to cultivate AI innovation in education, including encouraging responsible and effective AI use for teaching and learning, and strategically leveraging the technologies to support informed and effective decision making.

ENCOURAGE THE ADOPTION OF HUMAN-CENTRIC AI PRINCIPLES

Recommendation: AI should empower teachers and other education professionals to most effectively help students prepare for academic and workforce success after graduation. AI should augment teachers' capabilities, rather than replace them, and help educators with tasks that take time away from instruction and other direct learning support for students. This approach is not dissimilar to other economic sectors where future AI integration must respect and support human expertise. The AI Action Plan should acknowledge the vital importance of promoting human-in-the-loop systems in educational AI applications so that emerging AI innovations support, not supplant, human roles in teaching and learning.

PROMOTE PRIVACY, SAFETY, AND ETHICAL STANDARDS

Recommendation: AI innovation, development, and deployment should be accompanied by robust student and personnel data privacy protections and ethical standards. The vast data processed by AI poses risks to students' and education professionals' privacy and online safety. In education, safeguarding student data from misuse is paramount, and parents and students count on our schools to keep their information safe. We encourage the NSF to ensure that the AI Action Plan encourages the strengthening of existing privacy frameworks (e.g., Family Educational Rights and Privacy Act and the Children's Online Privacy Protection Act) and encourages Congress to address AI-specific concerns. The AI

Action plan should also encourage sector-wide AI ethical standards, emphasizing transparency, accountability, and online safety.

FOSTER INNOVATION THROUGH BALANCED REGULATION

Recommendation: Create a regulatory framework that safeguards public interests, empowers students and parents, and promotes innovation. Overly prescriptive regulations risk stifling AI advancements. In education, flexible policies enable the development of tools that enhance learning outcomes while maintaining safety. Rely on existing regulations that provide guardrails for technology in education, whenever possible. Encourage adaptive regulations that allow industries to innovate responsibly. Support non-binding guidance and best practice sharing to help sectors navigate AI integration without undue constraints.

INVEST IN AI WORKFORCE DEVELOPMENT AND AI LITERACY

Recommendation: Support education and workforce programs designed to increase AI literacy across economic sectors. Workers in all industries need the skills to effectively use and oversee AI tools. In education and workforce programs, teachers require preparation and professional development that will not only enable them to integrate AI into their classrooms but also to teach others how to use these innovative tools. The AI Action plan should encourage the development of AI literacy programs across all education and workforce programs, prioritizing sectors where human oversight is critical.

ENSURE ACCESSIBILITY AND ACCESS TO AI

Recommendation: Develop policies that promote expanded access to AI for learning. AI has the potential to reduce learning disparities but can also exacerbate problems if not deployed thoughtfully and extensively. In education, universal access to AI will ensure all students benefit from these exciting technological advancements. The AI Action plan should encourage Congress to invest in infrastructure and programs that support AI access for all students. The plan should also encourage industry practices that prioritize greater accessibility and access.

ENCOURAGE CONTINUOUS EVALUATION AND IMPROVEMENT

Recommendation: Promote ongoing research and evaluation to assess AI's impact on learning and guide future innovations and development. Continuous assessment will ensure AI learning tools remain effective, ethical, and aligned with students' and families' needs. For example, in education, evaluating AI's role in learning outcomes is essential. The Action Plan should encourage Congress to support cross-sector research initiatives that study AI's impact on students' academic and workforce outcomes. We urge you to support evidence-based evaluations that inform policy and industry best practices.

Conclusion

The development of a comprehensive federal AI Action Plan presents a pivotal opportunity to shape the future of AI in education and workforce programs and across economic sectors. By establishing policies that prioritize human-centric principles, safeguard privacy and ethics, encourage innovation, invest in workforce development, ensure equitable access, and promote continuous improvement, the plan can create an environment to ensure that AI benefits society at large.

HMH is committed to advancing responsible AI integration, particularly in education, and we look forward to contributing to this important initiative. Thank you for your leadership on this important area of innovation.

Sincerely,

A handwritten signature in black ink, reading "Lindsay Dworkin". The signature is fluid and cursive, with the first name "Lindsay" written in a larger, more prominent script than the last name "Dworkin".

Lindsay Dworkin
SVP, Policy & Government Affairs
HMH