August 20, 2025

Mr. Zachary Rogers
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Subject: Secretary's Supplemental Priority and Definitions on Advancing Artificial Intelligence in Education (Docket ID: ED-2025-OS-0118)

Dear Mr. Rogers:

On behalf of AASA, The School Superintendents Association, representing the nation's public school superintendents, we submit this letter in response to the Secretary's Supplemental Priority and Definitions on Advancing Artificial Intelligence in Education.

We recognize the growing importance of AI literacy for students and educators alike, and we agree that any serious vision for the future of education must include guidance on the responsible, ethical, and practical use of these tools and what they can mean for schools, impacting everything from teaching and learning to daily and systemic operations. District leaders are committed to ensuring that AI is integrated in ways that are safe, equitable, and grounded in the realities of the classrooms, students, educators, and communities they serve.

At the same time, it is difficult to fully embrace proposals to advance AI in education without acknowledging the broader context in which schools are operating. Public school systems are navigating historic educator shortages, driven in part by federal policy decisions that have consistently reduced investments in programs that attract, prepare, and retain teachers. Schools cannot unlock the potential of emerging technologies if they lack the professionals who bring learning to life. An AI strategy that is not paired with a intentional, sustained and adequately funded teacher strategy risks being incomplete at best and hollow at worst. AI strategy must be focused on supporting and empowering educators at the classroom, building and district level as they work to integrate the opportunities afforded by AI into teaching, learning and operations in effective and ethical ways with built in guardrails for transparency and protections for student and educator data and privacy.

We urge the Department to ensure that this priority explicitly centers the educator workforce. AI tools must serve as supports that strengthen, not substitute, the human relationships and professional expertise at the heart of student learning. Professional development opportunities should be sustained, embedded, and designed for all educators—including teachers, school

leaders, and administrators—so that they can guide responsible use and maximize impact for students.

Finally, we caution against framing AI as a silver bullet. Superintendents see daily the potential of AI to reduce administrative burdens, personalize instruction, and expand career pathways. But they also see its risks, from privacy concerns to inequitable access. A thoughtful national strategy must include clear guardrails, sustainable funding that does not come at the expense of other high-priority federal programs, and ongoing evaluation of what works in practice.

We welcome the Department's attention to this issue and stand ready to partner in shaping an approach that ensures AI enhances—not undermines—the core mission of public education: supporting every student with a well-prepared teacher in every classroom.

Sincerely,

Noelle Ellerson Ng
Chief Advocacy & Governance Officer
AASA, The School Superintendents Association