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Comments of the American Federation of School Administrators on the Proposed Priority and Definitions-Secretary's Supplemental Priority and Definitions on Advancing Artificial Intelligence in Education

The <u>American Federation of School Administrators (AFSA)</u>, the exclusive national labor union for 25,000 school supervisors and administrators across the country is pleased to file these comments on advancing artificial intelligence in education:

AFSA applauds the U.S. Department of Education for recognizing the potential of Artificial Intelligence (AI) to education and the workforce. We agree wholeheartedly with the premise of the proposed AI priority that "it is increasingly important for students to develop AI literacy. A strong foundation in AI literacy will help ensure students are prepared to navigate and contribute to a society where these technologies play a growing role in decision-making, communication, innovation, and career readiness." The language of this AI priority dovetails nicely with the AFSA resolution on AI, unanimously approved at our recent Triennial Convention, that states, in part, that AI "offers powerful opportunities to enhance teaching, learning, and school operations," and "can support educators by automating administrative tasks, personalizing instruction, identifying student needs, and providing data-driven insights that allow for more effective and individualized teaching."

We also agree strongly with the commitment to expanding educator understanding and improving their effective use of AI to improve teaching and learning. On this last point, we endorse proposed priority criteria (a)(iv), (v), and (vi), which would help ensure educators are well prepared to use and teach with AI beginning with pre-service programs, continuing with in-service professional development, and encompassing specialized professional development in computer science. We do suggest that these criteria be expanded to incorporate principals, vice/assistant principals, and other school administrators in the AI professional development context. Tasked with managing instruction at individual schools or groups of schools, it is imperative that school leaders be trained alongside other education professionals. Therefore, we urge you to expand criteria (a)(iv), (v), and (vi) to include school supervisors and administrators.

AFSA also takes notice of concerns raised regarding the misuse of AI in the educational context. We know that educators are spending time attempting to identify AI misuse and creating assignments that limit the potential for AI misuse. And each week new reports surface about how AI potentially infringes on intellectual property or student privacy and spreads misinformation, including deep fake photographs and videos.

Indeed, AFSA's AI resolution included a clear statement about these concerns and a strong recommendation for action. This resolution, titled "Integrate Artificial Intelligence into Public Education with Integrity", declared that "public education must lead the thoughtful, ethical, and human- centered integration of AI to ensure that new technologies uphold educational equity, protect student privacy, and reinforce the vital role of educators in shaping the academic and moral development of students." It concluded by resolving that "AFSA will work with Congress, as well as state and local school boards to...

- Provide funding for professional development programs that prepare educators and administrators to use AI tools effectively and ethically
- Ensure transparency and accountability in the adoption of AI systems in schools, with strong protections for student data and privacy"

We appreciate that the proposed priority's criteria incorporate some of these concerns: (a) (1) mentions developing skills including "how to detect AI generated disinformation or misinformation online" and (a)(6) supports professional development "about how to use AI responsibly".

However, we believe that the issue of AI misuse deserves greater primacy that it is accorded in the proposed criteria. Specifically, we urge you to consider including within them an additional requirement that all AI related grants provide for educating school staff and students on the responsible, ethical and moral use of AI. Additionally, AFSA supports the Department creating a separate criterion – and perhaps a separate grant opportunity – for the development of trainings and materials on the responsible, ethical and moral use of AI.

AFSA's resolution, Integrate Artificial Intelligence into Public Education with Integrity, also affirms that AI must be implemented in ways that are thoughtful, ethical, and human-centered. Building on that principle, we believe it is equally important to recognize that as AI becomes more deeply embedded in our classrooms, curricula, and school operations, it has the potential, if not approached with care, to unintentionally diminish the foundational, human-centered skills that are essential for student success in life, work, and community.

History offers a cautionary parallel: mobile and screen-based technologies connected us instantly across great distances, yet in many cases eroded the depth and quality of in-person connection when we were together. We must avoid repeating this unintended consequence with AI.

We therefore recommend that the Department place explicit emphasis within AI-related priorities, grants, and professional development on the identification, preservation, and strengthening of essential human skills such as:

- Oracy and effective communication
- Collaboration and teamwork
- Empathy and emotional intelligence
- Active listening and conflict resolution
- Creativity and problem-solving beyond digital contexts

School leaders must be central to this work. Principals, assistant principals, and other administrators, tasked with managing the instructional vision, culture, and priorities of their schools, should be trained and equipped alongside teachers to monitor, evaluate, and protect these skills during AI implementation.

To achieve this, we propose that AI-related projects and funding include:

- 1. Human-Centered Skills Impact Assessments Requiring grantees to examine and report on how AI adoption may affect students' interpersonal, social, and emotional development.
- 2. Balanced Integration Models Guidance for school leaders and educators on ensuring AI enhances rather than replaces opportunities for real-world collaboration, dialogue, and connection.
- 3. Skill Preservation Frameworks Research-based strategies for maintaining human-centered competencies while leveraging AI to enrich learning.
- 4. Ongoing Review and Adjustment Periodic evaluations led by school leaders and instructional teams to ensure AI integration strengthens both technological fluency and human fluency.

By embedding these safeguards into the national approach to AI in education, we ensure that innovation does not come at the expense of the very human qualities, connection, empathy, leadership, and creativity, that allow students not just to adapt to change, but to lead it.

We appreciate this opportunity to comment on these proposed priorities and would be eager to work with you further on this issue.

Sincerely,

Mark Cannizzaro

**AFSA National President** 

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