

October 7, 2025

Via email

The Honorable Linda McMahon
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

The federal government is taking unprecedented actions to encourage the use of artificial intelligence (AI) in education. In April of this year, the White House issued an executive order (*Advancing Artificial Intelligence Education for American Youth*) in which it committed to fostering AI competency among the nation's youth by promoting AI literacy and integration of AI into K-12 education.¹ The U.S. Department of Education (Department) has played an important role in achieving this priority, issuing *Guidance on the Use of Federal Grant Funds to Improve Education Outcomes Using Artificial Intelligence (AI)* and soliciting comments on the *Secretary's Supplemental Priority and Definitions on Advancing Artificial Intelligence in Education*.² Similarly, the First Lady has signaled the importance of these issues, using her first public remarks of this administration to address the issue of deepfake non-consensual intimate imagery (NCII), as well as hosting a meeting of the White House Task Force on Artificial Intelligence Education just last month.³ Finally, Congress is considering a bipartisan proposal, the RAISE Act, which would encourage states to adopt academic standards related to AI and other emerging technologies.⁴

New survey research from the Center for Democracy & Technology (CDT) confirms that AI is

¹ Exec. Order No. 14277, 90 Fed. Reg. 17519 (April 23, 2025).

² Press Release: U.S. Department of Education Issues Guidance on Artificial Intelligence Use in Schools, Proposes Additional Supplemental Priority, U.S. Dep't. of Educ. (July 22, 2025), <https://perma.cc/9XQM-XEPV>.

³ Betsy Klein, *Melania Trump to Use First Public Remarks of This Term to Shine a Light On Victims of Deepfake Revenge Porn*, CNN (March 2, 2025), <https://perma.cc/BGC4-GC4K>; *First Lady Melania Trump Hosts a Meeting of the White House Task Force on Artificial Intelligence Education*, White House Office of the First Lady (Sep. 4, 2025), <https://perma.cc/56KC-U6JS>.

⁴ *Husted Leads Bill to Integrate AI in Classrooms, Prepare American Students*, Jon Husted Senator for Ohio (Sep. 9, 2025), <https://perma.cc/EPN5-E89X>.

becoming more ubiquitous in K-12 schools.⁵ Eighty-five percent of teachers and 86 percent of students have used AI in class in the past school year (2024-25), with 50 percent of students using AI for school-related reasons. Almost half of teachers and students report that they have received some training or information on AI use in class, with almost 9 in 10 saying they found it helpful. In fact, teachers who use AI in many ways in the classroom are less likely to worry about AI being a distraction to learning, that AI has created an additional burden for them, or that using AI is more time consuming than helpful.

However, even as AI promises significant educational benefits, CDT's research also shows that the increased use of AI poses risks to students. Schools' use of AI is connected to negative effects on students' real-life relationships, as each of the following are more common the more ways AI is used in school:

- Fifty percent of students agree that using AI in class makes them feel less connected to their teacher.
- Thirty-eight percent of students agree that it is easier for them to talk to AI than their parents.
- Students (or a friend of theirs) used AI to have back-and-forth conversations in the past school year (2024-25) to do the following:
 - Forty-two percent to get mental health support
 - Forty-two percent as a friend or companion
 - Forty-two percent to use as a way to escape from real life
 - Nineteen percent to have a romantic relationship

Meanwhile, nearly one-third of students (31 percent) who have had back-and-forth conversations with AI for personal reasons (e.g., not for schoolwork) say that they do so using a device, tool, or software provided by their school. Only 11 percent of teachers report they received training or information on how to respond if they suspect a student's AI use is detrimental to their well-being (e.g., hurting self-esteem, encouraging risky behavior).

These and other results from our research demonstrate the importance of addressing the risks that can arise from the widespread use of AI in schools. The Department and the Administration more broadly have already recognized that doing so should be a priority. In its Dear Colleague letter released on July 22, 2025, the Department provided guidance on the use of federal grants to shape how AI is used

⁵ Elizabeth Laird, Maddy Dwyer, & Hannah Quay de la-Vallee, *Hand in Hand: Schools' Embrace of AI Connected to Increased Risks to Students*, Center for Democracy & Technology (Oct. 8, 2025), <https://cdt.org/insights/hand-in-hand-schools-embrace-of-ai-connected-to-increased-risks-to-students/>.

in the education sector, including *Principles for Responsible Use* aimed at protecting privacy, civil liberties, and fostering responsible use of AI in the classroom:⁶

- Educator-led: AI should support teachers, providers, tutors, advisors, and education leaders.
- Ethical: Within the K-12 realm in particular, educators should help students navigate AI to be able to evaluate the validity of AI outputs, to understand the appropriate use of AI in the context of social media, to learn with – rather than exclusively from – AI, and to leverage the promise of AI to be contributing members of a free society.
- Accessible: AI tools or systems should be accessible for those who require digital accessibility accommodations, including children, educators, providers, and family members with disabilities.
- Transparent and explainable: Stakeholders, especially parents, should understand how systems function and participate meaningfully in decisions about the adoption and deployment of new technologies.
- Data-protective: Systems must comply with federal privacy laws including the Family Educational Rights and Privacy Act.

Similarly, through her involvement in the White House Task Force on AI Education, the First Lady acknowledged the need “as leaders and parents [to] manage AI’s growth responsibly.”⁷ Additionally, the director of the White House Office of Science and Technology Policy, Michael Kratsios, testified before Congress a week later that, “It’s more important [to teach] America’s youth the limitations, where AI works, where it doesn’t work, making young Americans understand how this technology works.”⁸

As schools grapple with these issues, we call on the Department to incorporate the *Principles for Responsible Use* in carrying out the directions in the *Advancing Artificial Intelligence Education for American Youth* executive order regarding, “the use of formula and discretionary grant funds to improve education outcomes using AI,” and “identify[ing] and implement[ing] ways to utilize existing research programs to assist State and local efforts to use AI for improved student achievement, attainment, and mobility.”⁹ Embedding the Department’s *Principles for Responsible Use* into these commitments is critical to realizing the benefits of AI use in K-12 schools while minimizing harms to students.

⁶ Linda McMahon, *Dear Colleague Letter RE: Guidance on the Use of Federal Grant Funds to Improve Education Outcomes Using Artificial Intelligence (AI)*, U.S. Dep’t of Educ. (Jul. 22, 2025), <https://perma.cc/6AJW-QVTG>.

⁷ *Supra* note 3.

⁸ Justin Hendrix, *White House Office of Science and Technology Policy Director Michael Kratsios Testifies in Senate*, Tech Policy Press (Sep. 11, 2025), <https://perma.cc/2F7G-M77G>.

⁹ *Supra* notes 1 and 6.

Sincerely,

Center for Democracy & Technology

American Association of School Librarians (AASL)

American Library Association (ALA)

Common Sense Media

Disability Rights Education & Defense Fund (DREDF)

EdTrust

InnovateEDU

Internet Safety Labs

LGBT Tech

Open Technology Institute (OTI)

Cc: Michael Kratsios, Director, White House Office of Science & Technology Policy
Sarah Gesiriech, Director of Policy, Office of the First Lady
Rachel Oglesby, Chief of Staff for the Secretary of Education, U.S. Department of Education
Ross Santy, Chief Data Officer, U.S. Department of Education
Frank Miller, Acting Director, Student Privacy Policy Office, U.S. Department of Education