August 19, 2025

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

Dear Secretary McMahon,

On behalf of the Collaborative for Academic, Social, and Emotional Learning (CASEL), thank you for the opportunity to provide comments on the Department's Proposed Supplemental Priority and Definitions on Advancing Artificial Intelligence (AI) in Education. We are encouraged by the U.S. Department of Education (Department)'s leadership in releasing guidance on the use of AI to improve educational outcomes and by the agency's forward-looking vision embedded in the proposed priorities. The Department has a valuable role to play in supporting the effective and responsible integration of AI in schools.

CASEL is a nonpartisan, nonprofit field leader with a mission to make evidence-based social and emotional learning an integral part of education, from preschool through high school. Backed by three decades of rigorous research and steeped in the science of learning and human development, social and emotional learning is widely implemented in rural, urban, and suburban schools across the country.[1] Social and emotional learning is a fiscally sound investment, with an average of $11 returned for each dollar invested into such programs.[2] It provides students and adults with the foundational skills necessary to thrive in school, work, and life – including goal-setting, relationship-building, collaboration, and decision-making.

As AI systems are increasingly integrated into educational settings and the workplace, these human-centered foundational skills are becoming more essential than ever. LinkedIn's Global Talent Trends 2024 notes growing employer demand for problem-solving, adaptability, and collaboration – social and emotional skills that enable organizational agility and successful human-AI interaction.[3] States across the country are also recognizing this shift: a growing number have elevated social and emotional competencies as part of their "portrait of a graduate" frameworks,[4] underscoring the necessity of these skills for a well-equipped workforce.

There are numerous potential implications of AI in education, particularly how it impacts student well-being, academic, social, and emotional development, as well as opportunity gaps. At CASEL, we are collaborating

[1] Skoog-Hoffman, Alexandra, Asher A. Miller, Rista C. Plate, Duncan C. Meyers, Andrew S. Tucker, Gabrielle Meyers, Melissa Kay Diliberti, Heather L. Schwartz, Megan Kuhfeld, Robert J. Jagers, Lakeisha Steele, and Justina Schlund, Social and Emotional Learning in U.S. Schools: Findings from CASEL's Nationwide Policy Scan and the American Teacher Panel and American School Leader Panel Surveys. Santa Monica, CA: RAND Corporation, 2024. https://www.rand.org/pubs/research_reports/RRA1822-2.html.

[2] Belfield, C., Bowden, B., Klapp, A., Levin, H., Shand, R., & Zander, S. The Economic Value of Social and Emotional Learning. New York, NY: Center for Benefit-Cost Studies in Education. Teachers College, Columbia University. https://www.casel.org/wp-content/uploads/2016/09/SEL-Revised.pdf

[3] LinkedIn. (2024, October). *Global talent trends*. LinkedIn Talent Solutions. https://business.linkedin.com/talent-solutions/global-talent-trends

[4] Atwell, M. N., & Tucker, A. (2024, February 2). Portraits of a Graduate: Strengthening Career and College Readiness Through Social and Emotional Skill Development. Collaborative for Academic, Social, and Emotional Learning (CASEL) and Civic. https://casel.org/portraits-of-a-graduate-2024/

with researchers across the broader education and human development field to ask critical questions, uplift emerging best practices, and ensure AI's integration into education supports learners and empowers educators in ways that are safe, inclusive, and human-centered.

Human relationships are a vital part of education, with decades of research confirming that relationships are key for academic outcomes, student behavior, and student wellbeing.[5] The role of strong relationships in education is even more crucial as AI tools are incorporated into schools. While more research into AI in education is needed, current studies show that emerging technologies cannot replace the value of student-adult relationships or a caring teacher or parent modeling empathy, compassion, and connection.[6]

We recommend the Department strengthen its proposed priority by expanding and grounding it in the science of human learning and development and the human-centered foundational skills that students and educators need to succeed in an AI-enabled world:

Recommendation 1 - Under (a) "Expand the understanding of artificial intelligence through one or more of the following," add (xi) to support projects or proposals that "Strengthen human skills to enhance the application of AI while mitigating potential negative impacts."

In addition to expanding responsible AI use in education and understanding its potential, we urge the Department to augment the supplemental priority to support projects that mitigate AI's negative impacts on student well-being and development, and invest in human-centered foundational skills such as empathy, critical thinking, and interpersonal communication. In an AI-enabled world of work and learning, it is more important than ever to ensure that students develop foundational human skills that are necessary for success in school, work, and life. These skills, which include relationship-building, collaboration, resilience, and critical thinking, are essential for navigating an increasingly complex and technological society.

These skills also align with the Department's initial Proposed Supplemental Priorities, which state "the ability to read is the foundation for all learning, unlocking opportunities for academic, professional, and personal achievement and strengthening critical thinking skills essential to lifelong success." In fact, current research indicates that supporting students' critical thinking skills, as well as their self-awareness, self-management, social awareness, relationship skills, and responsible decision-making can foster students' literacy development, and vice versa.[7] By pairing responsible AI use with the intentional development of human-centered foundational skills, the Department can strengthen the very competencies that research shows reinforce literacy development and long-term academic success.

We must also ensure that the use of AI in education does not disrupt or limit opportunities for students to learn and develop through strong relationships and human-centered learning experiences in the classroom and at home with parents and other caregivers. Numerous studies point to the importance of a safe and

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[5] Emslander, V., Holzberger, D., Ofstad, S. B., Fischbach, A., & Scherer, R. (2025). Teacher–student relationships and student outcomes: A systematic second-order meta-analytic review. Psychological Bulletin, 151(3), 365–397. https://doi.org/10.1037/bul0000461

[6] Guilherme, A. (2017). AI and education: the importance of teacher and student relations. AI & Society, 34(1), 47–54. https://doi.org/10.1007/s00146-017-0693-8

[7] Ward et al (2025) How Social and Emotional Learning Supports Student Literacy, Pre K – Grade 5, https://casel.org/how-social-and-emotional-learning-supports-literacy-pre-k-grade-5/?view=1

supportive school climate in promoting student success.[8] As such, it is critical that AI not create a hostile school climate, promote bias, increase disproportionate discipline, or widen educational gaps. Mitigating potential harm from AI in the classroom and supporting safe and supportive learning environments cannot wait for additional evidence, learnings and case studies on AI in education to emerge, and must be pursued alongside investments that expand our understanding of how AI can support education and improve student outcomes.

To support this vision, we recommend reviving and updating a supplemental priority issued by the Department during President Trump's first term: "foster knowledge and promote the development of foundational skills that support schools and parents to prepare students to be informed, thoughtful and productive individuals ready to succeed in school and life." [9] We also support proactive investment in human-centered foundational skills to ensure that AI integration enhances rather than limits opportunities for all students.

Recommendation 2 – Under (b) "Expanding the appropriate use of artificial intelligence technology in education" add (x) to support projects or proposals that take "A human-centered approach to professional development for educators on the integration of the fundamentals of AI into their respective subject areas."

We are encouraged to see the Department's focus on educator professional development regarding the integration of AI in education. To build on this important effort, we recommend expanding the priority to emphasize a human-centered approach that not only equips educators with technical AI skills but also fosters their capacity to thoughtfully and responsibly guide AI technology use in the classroom.

Current research indicates that educators and families are not yet prepared to leverage the use of emerging technologies in education, and there is a growing need to equip both those entering the education profession and those already in classrooms with relevant training and resources.[10] [11] Professional development should deepen educators' understanding of AI to support responsible integration across subject areas to drive high-quality learning. This includes building knowledge of how AI works, its potential applications in education, and strategies for incorporating AI into teaching and learning across subject areas. Equally important is an emphasis on the ethical and responsible use of AI, including safeguarding student privacy and data security. By equipping educators with these proficiencies, this approach will empower them to integrate AI in ways that promote human flourishing by fostering students' social and emotional development, critical thinking, creativity, and problem-solving skills.

In addition, educator training should provide practical strategies for educators to design AI learning experiences for students that are inclusive, culturally responsive, developmentally appropriate, and tailored

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[8] Osher, D., Berg, J., Boyd, M., & Brush, T. (2021). The science of learning and development: Implications for education. Applied Developmental Science, 25(2), 97–140.

[9] U.S. Department of Education. (2017, October 12). Secretary's proposed supplemental priorities and definitions for discretionary grant programs (Proposed rule, 82 Fed. Reg. 47484). Federal Register.

[10] Guan, L., Zhang, Y., & Gu, M. M. (2025). Pre-service teachers preparedness for AI-integrated education: An investigation from perceptions, capabilities, and teachers' identity changes. Computers and Education: Artificial Intelligence, 8, 100341. https://doi.org/10.1016/j.caeai.2024.100341

[11] Druga, S., Christoph, F., & Ko, A. J. (2022). Family as a third space for AI literacies: How do children and parents learn about AI together? *CHI Conference on Human Factors in Computing Systems (CHI '22), April 29–May 5, 2022, New Orleans, LA, USA.* Association for Computing Machinery. https://doi.org/10.1145/3491102.3502031

to the unique needs of students. Such learning experiences should also provide opportunities for deeper learning, developing students' abilities to sustain focus, think critically and solve complex problems, communicate effectively, work collaboratively, and learn independently.[12] By centering professional development on both the human and technical aspects of AI, educators will be better prepared to support students' holistic development and prepare them for the complex challenges of navigating a future enhanced by AI.[13]

Recommendation 3 – Update (b)(vi) "Provide resources and support for the use of AI in teacher preparation programs."

We are pleased to see the inclusion of teacher preparation programs in the priority to enhance pre-service training in the integration of AI. We recommend that the Department build future educators' understanding about the appropriate and responsible use of AI in education by providing federal resources, guidance, and support for its integration into teacher preparation programs. This should include a focus on building educators' human-centered foundational skills, including ethical reasoning and critical thinking, so that future educators are equipped not only to use AI tools effectively, but also to evaluate their impact on learners and learning environments.[14] It also ensures that the next generation of educators model thoughtful, inclusive, and effective and responsible use of AI in ways that prioritize the well-being and human development of all students.[15]

Thank you for the opportunity to comment on these critical priorities. If you have any questions, please feel free to contact Lakeisha Steele, Vice President of Policy.

Sincerely,

A. Samuel

Dr. Aaliyah A. Samuel
President and CEO

Lakeisha Steele

Lakeisha Steele
Vice President of Policy

[12] American Institutes for Research. (2019). *Deeper learning: Improving student outcomes for college, career, and civic life.* https://www.air.org/resource/deeper-learning-improving-student-outcomes-college-career-and-civic-life

[13] Qureshi, I. (2025, March 15). *The impact of AI on teacher roles: Towards a collaborative human-AI pedagogy. AI EDIFY Journal, 2*(1). https://www.researchcorridor.org/index.php/aiej/article/view/243

[14] Bai, J. (2025). Overview and summary of AI competency framework for teachers. *Global Medical Education*. https://doi.org/10.1515/gme-2024-0029

[15] Black, E. W., Smith, C., & Lee, M. (2024). Preparing educators for AI integration: Seven critical strategies for teacher preparation programs. *Proceedings of the AAAI Conference on Artificial Intelligence, 38*(21), 22972–22980. https://doi.org/10.1609/aaai.v38i21.30351