



March 14, 2025

Faisal D'Souza, Technical Coordinator
National Coordination Office
Networking and Information Technology Research and Development
2415 Eisenhower Avenue
Alexandria, VA 22314

Attn: AI Action Plan

Dear Coordinator D'Souza,

On behalf of the undersigned higher education associations, I write to submit input on the development of an Artificial Intelligence (AI) Action Plan. We appreciate the actions of the Trump administration to quickly issue the Jan. 23 executive order to “define the priority policy actions needed to sustain and enhance America’s AI dominance, and to ensure that unnecessarily burdensome requirements do not hamper...AI innovation.” As part of this Request for Information, the administration seeks input on priority policy actions that should be in the new AI Action Plan, including those impacting education and workforce policy and the application and use of generative AI. Much of these comments are drawn from comments submitted to the Senate Committee on Health, Education, Labor and Pensions in response to a September 2023 white paper.¹

Higher education is critical to advancing AI, and U.S. leadership around the globe. It should come as no surprise that much of higher education has been ahead of the curve when it comes to developing and adopting AI into our courses and operations. Colleges and universities often develop and adopt innovative technologies well before the broader society. Given the relevance of AI to efforts to accelerate the production, advancement, and dissemination of knowledge, this embrace of AI is a natural fit for postsecondary institutions. It is being used to develop curricula and rethink how courses are delivered; support students and expand access; reduce burden and streamline processes; and create opportunities for students, faculty, researchers, and staff. The federal government has a critical role to play in nurturing the growth of this technology while ensuring that it is utilized in the service of expanding and enhancing education. Keeping that balance in mind, our comments focus on the possible impacts, both beneficial and concerning, to our students, our institutions, and our workforce.

Postsecondary Students

For students, properly designed and implemented AI tools offer the promise of greater support and enhanced academic opportunity throughout their academic careers. This begins with the initial step of choosing programs and institutions at which to study in the college

¹ See comments to Senators Sanders and Cassidy here: <https://www.acenet.edu/Documents/Letter-Senate-AI-092023.pdf>

search process. AI-powered chatbots can help students identify programs and institutions that not only meet their specific needs but might provide greater opportunities for success, including incorporating recent changes to simplify the Free Application for Federal Student Aid to provide advance knowledge of Pell eligibility or other forms of available student aid, as well as existing federal data on cost of attendance and aid awarded at institutions.

Through AI, students could get a personalized understanding of what aid may be available to them and how that is likely to compare across institutions they may be interested in. While AI cannot substitute for the support of a college admissions counselor, it can serve to help target information and facilitate the process, freeing up professionals to work more directly on aspects of their work that benefit from direct interaction, such as assisting students in preparing applications. After a student is enrolled, AI offers significant benefits for enhancing how institutions support them, including student tracking and push systems, which can identify early warning signs of disengagement, such as missing a class, and direct personalized interventions to ensure that the student is contacted and supported before issues accumulate.

Generative AI also demonstrates tremendous opportunities for academic support. Personalized, on-demand tutoring provides assistance that meets students where and how they learn in ways that faculty, teaching assistants, and academic advisors are not able to, allowing these professionals to devote more time to developing curricula, designing projects, and addressing more significant challenges students are facing. The data gained through student interactions can also be of tremendous benefit to educators, identifying concepts that students most struggle with, helping to shape how much time or attention in a classroom is directed to those areas. One other area where AI could be harnessed to improve the student experience has direct relevance for policymakers. Currently, students (along with other members of the public) who are entitled to receive local, state, and federal benefits such as financial aid and food assistance must apply for these benefits across a bewildering maze of forms. It is not hard to envision a process in which a student, guided by an AI chatbot, provides information one time and the system incorporates existing databases to supplement these answers and complete the applications across a range of programs, as well as identify next steps and assist in meetings.

All these benefits come with real risks as well. The collection and monitoring of personal data that these uses of AI require can raise significant privacy concerns if appropriate protective steps are not taken. In its annual survey of the postsecondary landscape in relation to AI, EDUCAUSE found that:

- Ninety percent of survey respondents are greatly or somewhat concerned about the “use of data without consent” for AI purposes.
- Eighty-seven percent are greatly or somewhat concerned about AI uses that might entail “violation of privacy and security laws and policies.”
- Eighty-nine percent have great or moderate concern about AI applications lacking sufficient data protection measures.²

² “2025 EDUCAUSE AI Landscape Study: Into the Digital AI Divide”

It is therefore critical to ensure that existing privacy protections in law are strengthened and adapted to address the expansion of AI to protect student privacy. For higher education specifically, it is important that the Action Plan recognize the long-standing role that the Family Educational Rights and Privacy Act (FERPA) plays in the protection of student educational records, particularly as concerns the potential misuse of students' educational data through improper disclosure or dissemination of personally identifiable information. Any actions the federal government might take around AI should incorporate existing FERPA regulations rather than weakening FERPA or creating any carveouts for AI technology.

Postsecondary Institutions

On campuses across the country, AI is already impacting how students learn, how faculty teach, and how institutions operate. While healthy debates over the appropriate role of AI in the classroom continue, AI is here to stay and will make generational changes to all three of these core areas. Among the many uses institutions are exploring is using AI to streamline, and in some cases remove, bias from some institutional processes, including the admissions process. In the admissions process, AI can perform initial screens of application materials to ensure that minimum requirements for admission are met before admissions personnel review them, saving countless hours of staff time. In addition, AI can review large datasets, such as transcripts, that could reduce time and burden for institutions as part of complicated admissions decisions in areas such as transfer.

AI has also been helpful in curriculum development for many institutions, especially in developing summaries, generating lesson introductions, and creating questions about material. These efforts provide students with more personalized content and instruction as well as reduce costs. Institutions have incorporated AI across the curriculum, leading to innovative work by students and faculty on how to incorporate AI into food production, for example. Institutions such as the University of Florida have entered into partnerships with other institutions to not only find innovative ways to incorporate AI into postsecondary courses but also to develop curricula targeted to the needs of elementary and secondary schools in the state.

The AI Action Plan should also prioritize the accuracy of information about higher education providers that students receive when using AI to inform their college plans. The fit between student, academic program, and institution can significantly affect the probability of student success. Likewise, the ability of a student to understand the financial aid options an institution can make available and how that relates to its cost of attendance can be a key factor in how effectively the student manages the stresses of pursuing a college degree. Therefore, it is important that the Action Plan push for AI providers to incorporate consumer protection mechanisms that mitigate to the extent possible the potential for students to receive inaccurate or misleading information concerning possible higher education providers.

There have already been a number of promising developments in the use of AI to help individuals with disabilities succeed in higher education. The use of AI to provide enhanced

<https://www.educause.edu/content/2025/2025-educause-ai-landscape-study/strategy-and-leadership>

accessibility tools (such as enhanced synthesized speech in test-taking environments, clearer and more accurate text-to-speech, and error-free closed captioning) will directly improve the experience of students with a range of disabilities. Beyond improving on existing tools, AI offers the promise of learning environments that can not only adapt to the way an individual learns but provide a tailored experience that will allow students with disabilities to move beyond more traditional accommodations. The ability to develop and share these applications widely can help to address the existing resource challenges many institutions face in adapting learning environments to the needs of those with disabilities.

Existing concerns about AI should not be minimized. Institutions of higher education and others are working to address issues of academic integrity as students and faculty work to incorporate AI, sometimes with good intentions, into academic work. Institutions and faculty are working to figure out how to determine if a paper or assignment has been completed by AI, rather than by a student. This also raises the issue of how to share best practices and new AI technology across higher education and with under resourced institutions, given that AI will be incorporated into many aspects of postsecondary education.

Workforce

The recent EDUCAUSE AI Landscape Study found that 68 percent of respondents considered preparing students for the future workforce to be the primary goal of AI-related institutional strategic planning.³ As the impact of AI on the economy and society continues to broaden and deepen, ensuring that students develop the knowledge and skills to use AI effectively in whatever ways are relevant to the sector or profession at hand will become increasingly vital to their personal success and the nation's competitiveness. Likewise, higher education institutions and the nation as a whole must prepare to support adults already in the workforce as they seek to acquire the expertise with AI that they need to continue progressing in their careers and advancing the state of their organizations and industries.

AI also offers possible advantages in workforce development, including expanding open access for greater participation in postsecondary education, creating opportunities for upskilling the existing workforce, and supporting credential tracking across institutions and different certificates. Indeed, some institutions are already creating standalone programs to provide skills and learning for workers looking to enter AI fields, including creating an "artificial intelligence boot camp" designed for learners with no AI skills to access entry-level technical positions in AI. There are numerous challenges in this area as well. As a recent study found, the future will demand workforce development "on a far larger scale" and will require employers to recruit based on "skills and competencies" rather than just on credentials.⁴ For postsecondary education to respond to these workforce needs, our institutions will need to become more agile. We will need to make investments across the education pipeline, from encouraging transfer of credit between institutions to encouraging students to major in AI fields to developing certificates and short-term programs to encourage new skills among those already in the workforce. The federal government can help incentivize these activities by funding pilot programs and convening groups to discuss best practices.

³ Ibid., "Figure 5. Primary Goals of AI-Related Strategic Planning."

⁴ McKinsey and Company, "Generative AI and the Future of Work in America"

<https://www.mckinsey.com/mgi/ourresearch/generative-ai-and-the-future-of-work-in-america>

What Can the Administration Do to Support AI in Postsecondary Education?

We believe there are several actions the administration can take to encourage the strategic use of AI and address some of the issues with AI in postsecondary education. For example, the annual EDUCAUSE survey shows that faculty and staff training in AI technology and skills as well as increasing access to AI tools are major strategic concerns for institutions of higher education.⁵ Moreover, the survey also found that the gap between large and small institutions in terms of available resources to realize the promise of AI for their students and faculty is troublingly large.⁶

Given these considerations, recommended actions include the following:

1. Establish experimental sites for institutions across the postsecondary spectrum, piloting the use of AI in admissions and other areas that support students, so best practices can be measured and shared broadly with the community;
2. Keep FERPA in mind when considering student privacy issues;
3. Encourage the U.S. Department of Education to convene groups and share best practices, especially with under resourced institutions unable to be early adopters of AI technology;
4. Incentivize the private sector to partner with consortiums of institutions, including under resourced institutions, and work to close the gaps in access to technology and requisite infrastructure to fully utilize AI across the postsecondary landscape;
5. Provide additional funding for the Small Business Innovation Research program at the Institute of Education Sciences and expand the Fund for the Improvement of Postsecondary Education Digital Learning Infrastructure and IT Modernization Pilot program to encourage the use of AI technology in postsecondary education and the development of tools that can be used across institutions;
6. Support efforts to protect academic integrity and incorporate AI into curricula; and
7. Support workforce development in AI throughout the academic pipeline, from associate degree programs through graduate and postdoctoral programs.

We look forward to continuing to engage with the administration on these important issues.

Sincerely,



Ted Mitchell
President

On behalf of:

⁵ Ibid., “Figure 3. Elements of AI-Related Strategy.”

⁶ “2025 EDUCAUSE AI Landscape Study: Into the Digital AI Divide—Special Focus: The Digital AI Divide Between Institutions” (<https://www.educause.edu/content/2025/2025-educause-ai-landscape-study/special-focus-the-digital-ai-divide-between-institutions>).

Achieving the Dream, Inc.
ACPA-College Student Educators International
American Association of Colleges and Universities
American Association of Colleges of Nursing
American Association of Colleges of Osteopathic Medicine
American Association of Colleges of Pharmacy
American Association of Collegiate Registrars and Admissions Officers
American Association of State Colleges and Universities
American Council on Education
American Dental Education Association
Association of Governing Boards of Universities and Colleges
Association of Jesuit Colleges and Universities
Association of Public and Land-grant Universities
Association of Research Libraries
Career Education Colleges and Universities
College and University Professional Association for Human Resources
Council for Advancement and Support of Education
Council for Christian Colleges & Universities
Council of Graduate Schools
Council of Independent Colleges
Council on Social Work Education
EDUCAUSE
National Association for College Admission Counseling
National Association of Colleges and Employers
National Association of College and University Business Officers
National Association of Independent Colleges and Universities
National Association of Higher Education Systems
UPCEA