



18 August 2025

Tracey St. Pierre, Director
Office of the Executive Secretariat
Office of the Secretary
U.S. Department of Education

In re: Comments in response to the US Department of Education proposed Supplemental Priorities on Evidence-Based Literacy, Educational Choice, and Returning Education to the States (34 CFR Part 75, Docket ID ED-2025-OS-0118)

As the scientists and engineers who are creating and deploying AI systems for use in all areas of daily life, IEEE agrees with the Department of Education and believes that it is important for America's students to be fully AI literate. Our future work force depends on ensuring that today's students are developing the skills necessary to work in the careers that will maintain US innovation leadership.

IEEE believes that, overall, the priority requires collaboration between K-12 education institutions, industry, technology providers, and philanthropic organizations in order to build a comprehensive ecosystem that supports the development of AI "natives" who can use AI systems to their full potential.

We suggest that the priority include the following additions:

- Provide incentives to encourage the participation of industry leaders and philanthropic partners in the development or editing of education standards - such as the use of AI in writing, and how to evaluate a highly reliable AI tool, so that the education community can identify a progression of skills and concepts to be introduced at all grade levels. This could encourage awareness among and increase the use of AI by educators teaching AI at the K-12 level.
- Ensure that students learn about AI from an early age, - thereby creating AI "natives" - by including data science and instruction in developing AI systems tools in all K-12 classrooms. Public, private, and non-profit organizations could be called upon to provide the resources that could be shared through a national database or other national shared AI resources such as the National AI Research Resource.
- Encourage providers of applicant tracking systems used by HR/hiring managers to prioritize the recognition of alternative credentials in topics such as AI (certificate programs, microcredentials) so that individuals who develop these skills through high school career and technical (CTE) programs, trade schools, apprenticeship programs, and other alternative learning paths are fairly considered for jobs for which they have the skills.

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- The Department of Education should work with existing credential database platforms to provide the American public with information about the skills and providers that offer credentials of value for upskilling and reskilling, while also measuring the long-term impact of those credentials on the careers of Americans.

Thank you for your leadership in this area and working to ensure a capable, future work force. Please do not hesitate to contact Erica Wissolik at e.wissolik@ieee.org or (202) 360-5023 with questions.