

Messaging Guide for Public Comment on AI in Education

**Submit your comment to the Department of Education by August 20, 2025, 11:59 p.m. EST
Include Docket ID ED-2025-OS-0118**

*This document was adapted from Nicki Petrossi's guide by the same name. Most of the content remains the same as the original with a few additions/tweaks from the Fairplay team. Many thanks to Nicki for allowing us to use it.

What's Happening

The federal government is encouraging schools—via Executive Orders and national initiatives—“for America’s young people to gain interest and expertise in AI technology from an early age.”

While innovation in education is important, the **use** of AI tools by children without proper guardrails raises serious concerns that need to be addressed before widespread implementation.

We’ve watched schools recklessly implement technology over the past 10 years **without proving clear, evidence-based advantages**. We cannot recommit the same mistakes with AI.

Instructions

- The Department of Education is now accepting public comment on this topic.
- Below is a collection of talking points that highlight the risks and concerns related to AI in K–12 education.
- **Choose the messages that resonate most with you and **reword them in your own voice.****
- **Do not copy and paste this document directly.** Duplicate comments may be ignored by the Department of Education.
- Your final comment should be **no more than 4,862 characters**, which is about two pages in 11-pt font.
- **Submit your comment to the Department of Education by August 20, 2025, at 11:59 p.m. EST - include Docket ID ED-2025-OS-0118:**
<https://www.federalregister.gov/documents/2025/07/21/2025-13650/proposed-priority-and-definitions-secretarys-supplemental-priority-and-definitions-on-advancing-open-comment>



Sample Phrases You Can Use in Your Personalized Comment

Please adapt/tweak or combine these when writing your comment - identical comments will be given far less weight:

- “My child should not be a test subject for unregulated AI technologies.”
- “If adults are struggling to understand the ethical use of AI, we should not expect children to manage these tools safely.”
- “AI may be the future, but the classroom is not the lab for trial-and-error deployment.”
- “Let’s not repeat the mistakes of the last EdTech boom. This time, we need to put child safety and development first.”



Final Step

Once you’ve written and customized your message:



Submit your comment (link below) by August 20, 2025, at 11:59 p.m. EST

<https://www.federalregister.gov/documents/2025/07/21/2025-13650/proposed-priority-and-definitions-secretarys-supplemental-priority-and-definitions-on-advancing#open-comment>

Your voice matters! Together, we can protect the future of education—and childhood.

Please direct questions to Randy Freiman at randy@fairplayforkids.org.

If you are curious to read more about our concerns regarding AI in schools and what we support, please see below:



Developmental & Educational Concerns

- AI tools should not be used in classrooms until independent research demonstrates that they are safe for children, give accurate information, and are effective pedagogically and follow all laws protecting student data and privacy.
- Children are still developing the cognitive and emotional skills needed to evaluate truth, bias, and safety. AI tools often produce inaccurate, harmful, or misleading content that students may take at face value.
- Children and adolescents are highly vulnerable to creating unhealthy attachments to tools that mimic human behavior due to their desire to connect with others.
- [Research](#) from MIT and MDPI shows that AI tools can suppress memory retention, creativity, and critical thinking by promoting cognitive offloading and “metacognitive laziness.”
- Face-to-face learning fosters soft skills like resilience, communication, and emotional intelligence—skills that screen-based, AI-powered tools undermine.

- Children already spend an average of 7.5 hours a day on screens for non-school activities (AACAP 2025). Increased AI use in school will only deepen this crisis and exacerbate the physical and mental health harms of screen time.
- Introducing AI to young children will not make them an “AI-ready workforce.” It will diminish the basic skills needed to thrive alongside AI.



Safety & Privacy Risks

- AI tools should not be used in classrooms until independent research demonstrates that they are safe for children, give accurate information, and are effective pedagogically and follow all laws protecting student data and privacy.
- AI systems collect vast amounts of intimate data—tracking students’ thoughts, emotions, health, and behavior—without informed parental consent.
- An [Internet Safety Labs](#) study found that 96% of the technology used in classrooms was sending student data to 3rd parties.
- Many AI platforms are open-source and unregulated, making it easier for students to misuse the technology in harmful ways, such as generating non-consensual explicit images (NCII) of peers or teachers.
- Examples:
 - [SchoolGPT](#) was tricked into giving an investigator step-by-step instructions for manufacturing fentanyl and date rape drugs.
 - While using [ChatGPT](#), a reporter from The Atlantic was given instructions for murder, self-mutilation, and devil worship.
- A [2025 Common Sense Media study](#) concluded that social AI companions are unsafe for anyone under 18 and carry unacceptable mental health risks.



Commercial Exploitation

- The AI business model mirrors that of Big Tech: extract data, maximize attention, and monetize behavior.
- History shows that EdTech often prioritizes profit over safety, transparency, or educational value. We cannot allow an even more powerful technology, like AI, to be rushed into classrooms without accountability and parental consent.
- Parents were not consulted before the last wave of EdTech adoption, and many now feel deceived and betrayed. The same must not happen with AI.



Academic Outcomes

- Despite \$30 billion a year spent on EdTech, student performance in reading, writing, and math [has declined](#).
- [OECD data](#) shows that students who use computers frequently at school perform worse in most learning outcomes.

- AI in the classroom will not magically improve learning—it may accelerate academic decline if introduced without rigorous evidence and guardrails.



What Parents Are Saying

- According to a [2025 S2D Foundation survey](#), **91% of parents do not want their child interacting with AI in school.**
- Parents are calling for a **pause** on AI implementation in schools until stronger safeguards, oversight, and child development standards are in place.
- We don't need more AI; we need more connection. Preparing kids for the AI age means **investing in human-centered learning**, not handing over childhood to machines.



What We Support

- The creation of guiding principles for schools that prioritize child safety, parental rights, and skills before screens.
- The investment in independent, national research on AI's impact on attention, empathy, critical thinking, and development.
- The development of ethical standards for school-facing AI technologies, teacher training, and research-backed protocols before implementation.
- A requirement that AI and digital literacy curriculum be taught across all grade levels, in an offline manner until developmentally appropriate.
- The establishment of a Technology & the Family Working Group within the federal government, comprised of child health and development experts and parental voices.