Generative Artificial Intelligence in K-12 Education

Guidance for Arizona Schools and School Systems

A Balanced Perspective

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Message from the Arizona Institute for Education and the Economy

When the Arizona Institute for Education and the Economy (AIEE) launched in the spring of 2023, I never imagined that artificial intelligence (AI) would become an initial focus area. However, as I traveled the state in the summer and fall of 2023 to meet with local leaders, both the energy and overwhelm around AI in education was palpable. It became apparent that the Institute, designed to create transformational solutions, would need to prioritize AI.

Early in the 2023-2024 school year, the Institute published an article titled, “AI In Education: Top 10 Questions for School Systems Leaders.” The goal was to encourage schools and school systems to get off the sidelines, shift conversations about banning AI, and begin to learn more about AI policies, practices, tools, and trends. Later in the fall, the Institute hosted a statewide session that aimed to demystify AI and challenge education leaders to grapple with what this technology could mean for our profession. Recently, in partnership with the Arizona K-12 Center, we hosted a four-part podcast series on AI in Education. Now, we present to Arizona our state’s first official AI guidance for K-12 school systems.

If you’ve been waiting for a signal to get started, consider this your permission slip. The light is green – it’s time to step on the gas. We don’t, however, encourage you to speed recklessly. Haphazard AI implementation is arguably worse than no AI implementation. That is why this document is subtitled, “A Balanced Perspective.” AI is a powerful, disruptive tool. It has the potential to transform education models and approaches to learning for good, but there are also pitfalls to avoid. We believe that responsible AI implementation can be an incredible agent of change in Arizona schools and classrooms if led by a true north star for student learning yet guided by the ethics that impact a just society.

If we are wise with usage and implementation of AI, we will embark upon a new kind of intelligence – a collective intelligence. A profession – and quite possibly a society – where we harness the best of human intelligence and also leverage the efficiencies and generative power of artificial intelligence to create a collective intelligence. An intelligence smart enough to close achievement and opportunity gaps, address the educator workforce crisis, and ultimately reimagine and redesign our educational system into the one that both our students and educators need and deserve.

Dr. Chad Gestson
Executive Director
Arizona Institute for Education and the Economy
Northern Arizona University
Acknowledgements

Core Team members determined the values and goals of the guidance found in this document. They also analyzed data, drafted, and revised the document’s content. The Reviewers provided critical feedback from multiple perspectives that shaped the content of this guidance.

AI Guidance Core Team

Luke Allpress M.Ed., Director of Innovative Solutions, Agua Fria Union High School District

Michelle Coots M.Ed., Manager of Instructional Technology, Deer Valley Unified School District

Alecia Henderson, Computer Science and Educational Technology Specialist, Arizona Department of Education

Dr. LeeAnn Lindsey, Director of EdTech and Innovation, AZ Institute for Education and the Economy, Northern Arizona University

Rachna Mathur, Sr. STEM Strategist, ASU Preparatory Academy

Roxi Thompson, Lead Instructional Technology Coach, Peoria Unified School District

Kristin Turner, Superintendent, Paloma Elementary School District

Arizona Reviewers

Dr. Steve Burrell, Vice President for IT and Chief Information Officer, Northern Arizona University

Kevin Davis, Superintendent/Business Manager, Willcox Unified School District

Yassin Fahmy, Senior Statistical Analyst, Arizona Department of Education

Dr. Curtis Finch, Superintendent, Deer Valley Unified School District

Abigail Fraser, Farmer, Everkrisp Vegetables Inc. and K-12 Parent

Andrew Fraser Ph.D., District Engineer, Maricopa Water District and K-12 Parent

Emily Marshall, Assistant Director of Education Technology, Vail School District

Tara Menghini, K-6 Educational Technology Teacher, Knox Gifted Academy

Alistair Mountz, Instructional Coach, Casa Grande Union High School District

Dr. Robert Pappalardo, Superintendent, Apache Junction Unified School District

Amanda Patrie, Executive Vice President & Chief Academic Officer, Arizona Charter Schools Association

Jonathan Perrone M.A., teachSTEM Program Coordinator, Arizona Educational Foundation

Sean E. Rickert, Superintendent, Pima USD

Nichole Sietsema, Student Records & Data Supervisor & AZ Student Data Privacy Alliance Manager, Mesa Public Schools

Tara Maria Suggs, Instructional Technology Integration Coordinator, Tolleson Union High School District

Dr. Paul Tighe, Executive Director, Arizona School Administrators

Samantha Thompson M.Ed., Administrator for Leadership and Accountability, Student Choice High School

Dr. Michelle Watt, Chief Systems Officer, Scottsdale Unified School District

National Reviewers

Dr. Helen Crompton, Professor of Instructional Technology, Old Dominion University

Adam Garry, President, StrategicEDU Consulting

Dr. Stacy Hawthorne, Chief Academic Officer at Learn21 and member CoSN Board of Directors
Introduction

The Arizona Institute for Education and the Economy (AIEE) exists to cultivate solutions that improve K-12 education outcomes and ensure long-term statewide economic prosperity (AIEE, 2024). Sitting at the intersection of PK-12, higher education, and workforce development, we first seek to understand what is needed for Arizona’s future to thrive, then work with stakeholders to innovate bold solutions to transform outcomes for our students.

The Future of Jobs Report 2024 by the World Economic Forum forecasts significant changes in the job market over the next five years prompted by Artificial Intelligence (AI). According to the report, 75% of surveyed companies plan to implement generative AI by 2027, resulting in both job losses and new job creation. Other research has indicated that 19% of the workforce could have over 50% of their tasks automated by AI (Eloundou et al., 2023). Additionally, AI and machine learning are identified as skills most prioritized for reskilling and upskilling in the next five years (World Economic Forum, 2023). In light of this shift, educators and system leaders must consider how we prepare our students for economic agency in an evolving landscape.

“In light of this shift, educators and system leaders must consider how we prepare our students for economic agency in an evolving landscape.”

To help guide Arizona’s education leaders in addressing AI technologies, the AIEE assembled a group of education experts to develop guidance that would assist Local Education Agencies (LEAs) to responsibly and confidently chart a path forward. As a team of education technology leaders, administrators, curriculum, and IT professionals, our collective experience is brought together in this document to offer a north star, proposed guardrails, and implementation recommendations.

This guidance is grounded in two core beliefs – 1. Artificial Intelligence has the potential to be the catalyst for positive transformation of education models, and 2. Responsible implementation requires a nuanced understanding of the ethical implications. With that in mind, our team has taken great care to present this guidance reflecting a balanced perspective.
About This Document

Artificial Intelligence, especially Generative Artificial Intelligence (GenAI), has rapidly emerged in the K-12 landscape, bringing with it both excitement and confusion. This document intends to provide direction for K-12 leaders as they grapple with the implications of GenAI in education and make plans to address it.

The first steps to moving forward with intention include establishing a common language and leading important conversations about purpose and vision. The information provided in this document can help strengthen individual and collective understanding of GenAI including the opportunities, imperatives, and risks inherent in its use.

Document Organization

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<td><strong>Explainer:</strong> Build a basic understanding of Generative AI to better navigate this document and participate in AI-related conversations.</td>
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<tr>
<td>Powerful Teaching and Learning &amp; School and Administrative Uses</td>
<td><strong>North Star:</strong> Envision the possibilities to transform not only teaching, learning, and leadership, but also our profession, and unquestionably, our future workforce.</td>
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<td>Responsible and Ethical Implementation</td>
<td><strong>Guardrails:</strong> Strengthen understanding of what’s at stake in order to move forward safely and responsibly.</td>
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Overarching Value: The Human Agency and Oversight Imperative

This guidance was built around a core value of human agency and oversight at every stage of AI-use and implementation. It’s essential that humans serve as a critical navigator of AI use and ensure alignment with educational and societal goals. The U.S. Department of Education Office of Educational Technology’s policy report, *Artificial Intelligence and the Future of Teaching and Learning: Insights and Recommendations*, emphasizes “humans in the loop” stating, “Teachers, learners, and others need to retain their agency to decide what patterns mean and to choose courses of action (2023, p. 6). Likewise, in their AI guidance document, the Washington Office of Superintendent of Public Instruction suggests a “Human -> AI-> Human” frame to establish a collaborative partnership with AI that reflects human agency and governance over its use (2024).
To further explain the human and AI relationship, Vera Cubero from the North Carolina Department of Public Instruction uses an analogy of three different bikes. She compares education without AI to a mountain bike – the human is in control with no assistance, too much reliance on AI to a motorcycle – fast but potentially dangerous, and partnership with AI to an e-bike – the bike assists and the human is in control (NCDPI, 2024).

**Appropriate Use of GenAI in Education**

**Education without AI**

Like riding a mountain bike, the human is in control, but also has no assistance. Sometimes the struggle inhibits learning.

**Too Much Reliance on AI**

Like riding a motorcycle, you can go really fast, but it is unpredictable and can even be dangerous.

**Using AI as a Learning Partner**

Like riding an E bike, the human is totally in control, but the E bike can reduce the struggle and result in more productive learning.

Image used per Creative Commons attribution. Original use found in *North Carolina Generative AI Implementation Recommendations and Considerations for PK-13 Public Schools.*

*The European Commission* (2022, p. 19) provides questions to initiate reflection and dialogue about human agency and oversight in the implementation of AI in education.
Artificial Intelligence (AI) refers to computer systems or algorithms that simulate human intelligence or problem-solving. It is not new technology – in fact, it has decades of use even in the field of education. In the 1990s, edtech companies used adaptive learning technologies to adjust the pace and style of digital content based on student needs, making learning faster or slower and adjusting the lessons for students. In the 2000s, schools and colleges began using machine learning on their “big data” to predict student performance and intervention needs. Still, the release of ChatGPT in November 2022 has caused a new flurry of interest in AI technologies.

Text-based interaction with AI (“chatbots”) and AI-powered image & video creation tools are powered by a subset of AI called Generative AI which produces content that often appears as though it came from a “human hand.” The graphic from AI for Education (2023) clarifies how GenAI is positioned in the broader field of AI.

It is important to understand that AI tools, GenAI included, are not inherently knowledgeable; they learn from large amounts of data collected from all over the internet and world, which introduces an inherent bias to their output. Imagine two 18-year-olds, one who grew up in rural Arizona and one who grew up in bustling Tokyo. They are both human, but their differences in lived experiences cause their worldviews and perspectives to be drastically different. Just as humans are influenced by both nature and nurture, a GenAI tool will reflect the algorithms and the datasets that trained them, both of which are selected by companies whose interests are not always aligned with those of educators. Further, GenAI models that currently exist cannot precisely define how or why they produce an output. Therefore, when it comes to biased or inaccurate output that feels “human” it is important to understand that the tool gave the statistically best answer or product based on what we asked, shaped by the training data used in that model.

The ability of GenAI tools to mimic human patterns of communication and creation has potential to be valuable in the world of education. For example, the use of “tutor bots” that allow students to have individual coaching that feels like a human conversation is being explored by both technologists and educators. As these explorations unfold, we will learn more about the impacts and net effect.

With a high regard for innovation and to set the tone of possibility, we continue with an investigation of GenAI's role in powerful teaching and learning.
Harnessed appropriately, GenAI can be a catalyst for pedagogical models that increase equitable learning conditions, foster learner agency, and equip students with highly valued future-forward skills. However, we must not treat AI as though it is a magic bullet that will miraculously improve student outcomes. Whether our instructional goals aim toward content achievement, digital literacy, or workforce skills, we should anchor instructional choices in a vision for powerful teaching and learning.

“Whether our instructional goals aim toward content achievement, digital literacy, or workforce skills, we should anchor instructional choices in a vision for powerful teaching and learning.”

Use the information in this section to spark conversations around the true value of GenAI-use in the classroom. Dialogue among teachers, administrators, instructional coaches, and curriculum leaders will help frame your organization’s perspective on powerful practices for teaching and learning in an AI-powered world.

Educators can lean into the Arizona Academic Standards, including those for Computer Science, Educational Technology, and content areas to anchor instructional decisions.

Arizona Academic Standards

- Computer Science
- Educational Technology
- English Language Arts
- History and Social Science
- Mathematics
- Science
AI Literacy

AI literacy includes the knowledge and skills that enable humans to critically understand, use, and evaluate AI systems and tools to safely and ethically participate in an increasingly digital world (Digital Promise, 2024).

As educators, we shape students’ understanding of the world and prepare them for active engagement in it. Because GenAI will continue to transform the way we work and live, we must make AI literacy a priority for all students and adults in our communities. Creating an AI-literate population is the only true approach to shaping an AI-driven world that is safe and just. AI-literate individuals are better equipped to be proactive and participatory in shaping the technology’s use within our schools and our lives.

Our team’s unwavering stance on the importance of AI Literacy as a core skill for the future has led to its inclusion at several points throughout this guidance document. We encourage all LEAs to create an AI Literacy plan that includes curriculum and professional development affixed to the Arizona Academic Standards.

The following table shows key alignment between AI literacy and AZ Academic Standards.

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<tr>
<td><strong>Critical source evaluation:</strong></td>
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<tr>
<td>• Identify biases and misinformation in AI-generated content and understand their societal implications</td>
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<tr>
<td>• Demonstrate source transparency, including GenAI tools and output</td>
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<tr>
<td>• Critically evaluate information generated by AI across multiple sources</td>
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<td><strong>Data Management</strong></td>
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<tr>
<td>• Manage and protect one’s own and others’ data when using AI</td>
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<td><strong>Cybersecurity</strong></td>
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<tr>
<td>• Protect computers, networks, and data from unauthorized access or harm</td>
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<tr>
<td>• Understand common cybersecurity threats</td>
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<tr>
<td><strong>Computational Thinking</strong></td>
<td></td>
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<tr>
<td>• Break down complex problems into smaller, more manageable parts</td>
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<tr>
<td>• Detect patterns, trends, or regularities that can help inform decision-making and problem-solving processes</td>
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<tr>
<td>• Develop step-by-step solutions that can be replicated</td>
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<tr>
<td>• Assess and analyze the effectiveness of solutions to problems or tasks</td>
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<td><strong>EdTech Standard 2: Digital Citizen</strong></td>
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<td><strong>Science and Engineering Practice 8</strong></td>
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<td><strong>Computer Science Concept: Impacts of Computing</strong></td>
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<td><strong>Computer Science Concept: Networking and the Internet</strong></td>
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<td><strong>Computer Science Concept: Data and Analysis</strong></td>
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AI Integration

Integrating GenAI into the classroom marks a transformative shift in educational practice as teachers and students use it to shift learning models so that teachers serve as facilitators who coach students to develop learning agency. While some educators at first feared that AI would reduce the human aspect of teaching, if used appropriately, it holds vast potential to foster a more humanistic approach.

We share the classroom use cases below to paint a picture of the possibilities of intentional use of GenAI. Applications like these can improve instruction and create more space for human interaction between teachers and students.

Teacher Use Cases

GenAI offers teachers a wide range of applications that can simplify routine tasks, create learning materials, or serve as a thought partner. Initially, educators may be most excited to use tools to accomplish everyday tasks more quickly. However, the real value of saving time happens when teachers reinvest that time into creating more effective lessons and having more real-time academic conversations with students.

Consider how the following examples of teacher use may foster a culture of personalized and inclusive education with strong teacher/student connections.

- **Idea Generation**: Use GenAI to generate fresh ideas, making learning more engaging and relevant for students.
- **Reflective Practice**: Engage with GenAI as a thought partner to improve lesson plans and bolster elements like differentiation, student choice, and collaboration.
- **Accessibility Check**: Ask GenAI to look for potential accessibility oversights in lesson plans and to provide strategies to strengthen inclusivity.
- **Feedback Loop**: Use GenAI to test for alignment between instructional plans, materials, and assessments.
- **Content Customization**: Leverage AI to tailor content to the unique needs of each student including those in English learner, special education, and gifted programs.
- **Adaptive Materials**: Use AI to modify reading levels of texts, design activities that cater to students’ interests, and create visual aids for complex vocabulary or concepts.
- **Feedback and Assessment**: Use AI as a starting point to provide more regular and personalized feedback on student assignments, enabling timely and individualized responses.
- **Task Automation**: Use AI to handle routine tasks efficiently, such as composing emails, creating rubrics, or writing detailed instructions.
- **Interactive Presentations**: Have AI design engaging slide decks that include student engagement features.
- **Visual Content Creation**: Generate custom images with AI to support educational content.
Human Oversight:
Teachers ensure student use is developmentally appropriate and adheres to age requirements.

Student Use Cases

When ChatGPT was first released, it conjured images of students furiously copying and pasting, which some thought would surely be the demise of education. While this is an understandable first reaction, it is only so in the context of assignments and assessments that can be easily generated, copied, and pasted. In other words, AI can be the catalyst to push beyond the status quo of multiple-choice tests and basic essays, rethinking what we ask students to do and why.

GenAI offers capabilities that can allow students to be more independent and self-directed in their learning journey. Students may find additional uses that bring out curiosity, creativity, and reflection. Consider the following examples of student use.

- **Goal-Setting:** Students use GenAI as a thought partner to establish realistic and attainable learning objectives.
- **Planning:** AI helps students to map out a personalized schedule for completing extensive projects.
- **Reflection:** Students partner with GenAI to think about their learning process.
- **Interactive Learning:** Students engage with GenAI to gain deeper insights or clarification on topics, including those of personal interest.
- **AI Coaching:** GenAI serves as a coach by recommending reading materials that align with a student's interests and reading proficiency.
- **Writing Enhancement:** Students use GenAI throughout the writing process as a critical friend. AI can help brainstorm, outline, draft, revise, and proofread.
- **Inclusive Tools:** GenAI tools provide incredible support to students with differing abilities.
- **Language Support:** English Language Learners use AI to practice speaking or to translate textual and auditory content.
- **Content Acquisition:** Students use AI to create summaries and explanations that help them better understand assigned material.
Risks of Teacher and Student Use

Although there are many exciting possibilities for teacher and student use, educators also have a responsibility to consider possible downsides. In the spirit of the balanced approach this guidance seeks to encourage, consider these risks to integrating GenAI into teaching and learning practices.

• **Over-Reliance on Technology:** No technology can replace the deep understanding that educators have of their students’ unique needs and preferences. Nor can it improve student learning if it is used as a crutch.

• **Dependence on Specific Tools:** GenAI tools are usually developed and maintained by private companies who may decide not to stop offering the tool or change pricing in ways that are prohibitive for LEAs to fund its use.

• **Accuracy and Quality Assurance:** Some educators may find it challenging to verify the accuracy and quality of AI-generated content.

• **Loss of Human Interaction:** Automating solutions creates a risk of decreased human interaction (adult-student, adult-adult, student-student) in exchange for efficiency. In turn, this presents the potential to exacerbate loneliness, isolation, and anxiety.

• **Implementation Dip:** As GenAI and its use in education continues to evolve, we will learn more about best practices. In the meantime, it could result in an “implementation dip” with a beginning-stage net negative impact.
Redefining Academic Integrity

Within the educational implementation of GenAI lies a transformative opportunity to reconsider the methods we use to teach and assess student learning. We can challenge the traditional notion of cheating and plagiarism by redesigning curriculum and assignments that students are eager to learn and are willing to invest time and effort to complete. Assignments that encourage authentic student engagement and creation can rarely be completed via automated solutions.

Redefining “acceptable use” requires students, staff, and families to grapple with new questions about cheating, plagiarism, and future-forward skills.

Matt Miller (2022) offers updated definitions of plagiarism and cheating, as well as a graphic that illustrates a continuum of GenAI-reliance that education leaders can use to foster important dialogue with administrators, teachers, students, and families.

- **Cheating**: When a student does something dishonest in academic work that misrepresents what they understand or are able to do for an unfair advantage.
- **Plagiarism**: When a student represents some type of work as their own creation when, in reality, it is not their own work.

Graphic used with permission from Matt Miller of DitchthatTextbook.com

Refer to state and federal laws regarding age requirements and data privacy to further guide decisions about student-use.
Citation and Disclosure

It is true that the integration of GenAI into our creative processes introduces more complexity to practices that ensure transparency and ethical use of tools and content. For example, citing AI use becomes challenging when AI technology is embedded into other digital tools (Bauschard, 2024). Additionally, as educators and students adopt a collaborative approach with AI (Human -> AI -> Human) it becomes difficult to distinguish the contributions made independently from those generated by AI.

Despite these complexities, the overarching goal remains: to uphold transparency. Adults and students should strive to consistently be clear and forthright about the extent to which AI tools have been utilized in the creation of academic work. The following resources provide a sample of how to cite the use of AI:

- **MLA Style - Generative AI**
- **APA Style - ChatGPT**
- **Chicago Style - Generative AI**

AI Detectors

In the pursuit of upholding academic integrity, some teachers and administrators have looked to AI detectors to combat cheating and plagiarism. The primary problem with this approach is that AI detectors have proven to be unreliable. Their frequent false positives punish students whose first language isn’t English at a higher rate (Sample, 2023). What’s more, students with higher AI literacy are more likely to get past the detector.

For these reasons, AI detectors should not be used as a sole source of determining whether plagiarism has occurred. Rather than relying on flawed technology, a more effective approach is to establish clear policies and expectations through an AI Acceptable Use Scale, encourage open communication, and nurture students’ intrinsic motivation by offering them choices and opportunities to explore their interests within assignments (Clark, n.d.).

![Human Oversight: Teachers can foster academic integrity by establishing clear policies and expectations for AI use, encouraging communication, and nurturing students’ intrinsic motivation.](Graphic used with permission from Holly Clark, author of The AI Infused Classroom)
Not only does GenAI present transformational opportunities for the classroom, it also provides capabilities that can enhance efficiency within school systems. The truth is, GenAI can perform some administrative and organizational tasks better than a human can. Consider its ability to analyze student data quickly and accurately. GenAI can also help streamline administrative tasks, freeing up time to focus on more impactful activities.

The following ideas can spark ideas about how using GenAI might transform school operations and systems outside of the classroom. This list is not exhaustive; in fact, conversations regarding AI for non-classroom use are presently at the beginning stages and gaining interest. As AI becomes even more integrated in education, opportunities and risks for school and administrative use will become more apparent.

**Opportunities**

- **Improve efficiency**: Use GenAI to automate repetitive tasks such as drafting communications and preparing presentations.
- **Enhance data analysis**: AI algorithms can analyze large volumes of data quickly and accurately, making its analysis easily consumable for all users and aiding in data-driven decision-making processes.
- **Streamline master scheduling**: Use AI to create a master schedule in minutes, not months. Balancing class sizes, teacher availability, and room assignments while taking into account factors such as teacher certifications, student course selections, and resource availability becomes far less cumbersome.
- **Optimize evaluation processes**: GenAI tools can aid evaluation processes by organizing notes by the appropriate criteria.
- **Gather and disseminate information**: GenAI tools can serve as a tool to answer both internal and external questions about complex systems such as special education, student discipline, bonds and overrides, and more. Consider how a chatbot could be used to enhance family communication.
- **Draft procedures and policies**: Use GenAI to develop internal processes and procedures that can be sent to a legal team for review rather than having an attorney develop it from scratch.
- **Create how-to resources**: Use AI to create both video and written steps for internal processes such as taking attendance, accessing a shared drive, submitting a time off request, etc.
- **Translate**: GenAI can translate documents, spoken word, or typed information to many different languages simultaneously. It can also answer questions, give directions, and provide information to stakeholders in many different languages.

**Risks**

- **Loss of human interaction**: Over-reliance on AI may diminish the personalized interactions and human connections that are essential for fostering a supportive and inclusive school environment.
- **Bias in algorithmic decision-making**: AI systems are susceptible to biases present in the data used to train them, potentially leading to discriminatory outcomes or reinforcing existing inequities within the school system.
- **Data privacy concerns**: The collection and analysis of sensitive student and staff data by AI systems can raise privacy concerns that must be carefully addressed through robust data protection measures and compliance with relevant regulations.
- **Technical challenges**: Implementing and maintaining AI systems requires specialized technical expertise and infrastructure, posing challenges for schools with limited resources or technological capabilities.
The power of GenAI to produce human-like outputs presents remarkable opportunities for Arizona’s schools and classrooms; it also punctuates the need for staff and student training, as well as regulation that is informed by legal and ethical input. At this point in its societal adoption, it is impossible to know the full gamut of ethical considerations – but based on how GenAI is trained, what it produces, and how, some key ethical risks are evident.

To help Arizona’s education leaders better understand the ethical terrain of GenAI, we present five key considerations to begin critical dialogue within their institutions. While these may not cover the entire spectrum of ethical challenges posed by GenAI, they reflect some big ideas that LEAs should consider. We end this section with recommendations to address ethical considerations.

1. Bias
2. Misinformation
3. Intellectual Property
4. Data Privacy
5. Equitable Access

Consideration #1: Bias

GenAI systems use Large Language Models (LLMs) that are trained on extensive datasets, primarily consisting of human-generated content. Consequently, these models inherently incorporate human and societal biases into the applications and outputs they produce. Punya Mishra from Arizona State University has highlighted a concern that most contemporary datasets are WEIRD, that is, they “disproportionately represent Western, Educated, Industrialized, Rich, and Democratic societies” (Mishra, 2023; Shulz et al., 2018). This imbalance can distort perspectives, perpetuate narrow worldviews, exacerbate biases that marginalize minority and underrepresented communities, and cause harm to individuals.

Risks

- Student tracking based on data containing inherent bias can lead to unfair treatment that perpetuates inequities.
- Use of biased GenAI output absent critical evaluation can affirm narrow worldviews and exacerbate societal biases.
- AI-generated teaching materials may reflect bias.

“You should not face discrimination by algorithms and systems should be used and designed in an equitable way. Algorithmic discrimination occurs when automated systems contribute to unjustified different treatment or impacts disfavoring people based on their race, color, ethnicity, sex (including pregnancy, childbirth, and related medical conditions, gender identity, intersex status, and sexual orientation), religion, age, national origin, disability, veteran status, genetic information, or any other classification protected by law.”

Principle #2: Algorithmic Discrimination Protections, Blueprint on AI Bill of Rights Whitehouse.
Consideration #2: Misinformation and Falsehoods

Manipulated videos of political leaders, websites containing inaccurate medical advice, and tales of celebrity death hoaxes are examples of GenAI-created falsehoods. While misinformation has been persistent in digital platforms for some time, the introduction of generative technologies makes both intentional and unintentional creation of “believable” stories easier, amplifying its spread. Widely spread misinformation can manipulate public opinion, polarize society, and even influence election outcomes, over time eroding citizens’ faith in institutions and undermining democracy.

Why does GenAI produce misinformation?

If the data used to train an AI model contains misinformation or biased content, its output will reflect the false information. Moreover, when confronted with incomplete or contradictory input, AI models resort to probabilities to fill in gaps that are often creative but lack any factual basis. This phenomenon is commonly known as “hallucination” - although many prefer the term “error” which uncouples it from the medical definition and humanization of the technology.

Risks

- As with bias, misinformation generated by AI can perpetuate biases and stereotypes or reinforce societal prejudices.
- AI-generated curricular materials can contain general inaccuracies which, if undetected by teachers, can mislead students and distort learning.
- Misinformation can plague student research efforts if they are not taught to use GenAI effectively, including evaluating and verifying output.

Consideration #3: Intellectual Property

Since GenAI relies on existing data, its output naturally raises questions about content ownership, copyright, and intellectual property (IP). Current policies and laws may be inadequate to address IP issues generated by a machine, although interpretations are beginning to surface amidst novel situations. For example, in 2023 a federal judge ruled that copyright may not be granted for images generated with AI citing a lack of human authorship; he also acknowledged that the rise of GenAI will prompt challenging questions about copyright protection and existing copyrighted works (Bloomberg Law, 2023).

The introduction of GenAI into educational contexts has left many educators feeling apprehensive about accepting student work that may have been machine-generated. Certainly, these new tools challenge traditional understandings of authorship with respect to human creativity. Concerns over intellectual property intersect with questions about academic integrity, professional responsibilities, and student learning.

Risks

- GenAI introduces another means for plagiarism - whether intentional or unintentional.
- Authorship is not always clear-cut, leading to confusion around plagiarism and academic integrity.
- GenAI can inadvertently produce content that violates copyright laws or lacks appropriate attribution.
- The authenticity of content and communication may be compromised or challenged.
- Personal values may be threatened by individuals, including teachers and other professionals who feel as though their use of machine-generated content or lessons is “cheating.”
Consideration #4: Data Privacy

Because of the way GenAI uses data, it can store, process, and reveal personally identifiable information (PII). According to the 2023 report, *Artificial Intelligence and the Future of Teaching and Learning*, published by the U.S. Department of Education Office of Educational Technology, most AI models do not consider educational use or student privacy. Therefore, their products may put student data at risk, diminishing an LEA’s efforts to comply with student privacy mandates. Data privacy may also justifiably be a concern for parents and caretakers. Being transparent with the community about data protection practices can go a long way in building trust and credibility with the community.

**Risks**

- An LEA’s compliance with student privacy laws may be put at risk by using certain tools and applications in a school setting.
- Introducing AI in the school environment may raise questions from parents and families regarding the protection of their children’s data.
- Problems can occur if data that was used as GenAI input for a specific purpose is later used in a different application. For example, data collected for research and then repurposed for commercial purposes is considered data misuse.
- GenAI tools and platforms may be susceptible to security breaches, hacking attempts, or unauthorized access which could compromise the confidentiality and integrity of student data.

**Relevant Policies in the US and Arizona**

- **Children’s Internet Protection Act (CIPA):** Ensure that AI tools and platforms align with internet safety policies, web-filtering measures, monitoring requirements, and provisions established to protect students from accessing obscene or harmful content online.
- **Family Educational Rights and Privacy Act (FERPA):** Safeguard student educational records to protect student privacy and confidentiality. Train teachers to securely manage student records, such as grades and attendance, and avoid the disclosure of personally identifiable information without proper consent.
- **Children’s Online Privacy Protection Rule (COPPA):** Only use tools that adhere to COPPA age and parental consent requirements, noting that some platforms’ terms of service require users to be at least 13 years old or with parental consent while others may have age restrictions for students under 18.
- **Protection of Pupil Rights Amendment (PPRA):** Be mindful of AI use that requires students to provide information on protected areas.
- **Arizona Revised Statute 15-142:** Ensure that the use of generative AI tools safeguards student directory information and school property data.
- **Arizona Revised Statute 15-117:** Adhere to survey protocols, obtain parental consent, and maintain informed consent procedures when employing GenAI tools.
- **Arizona Revised Statute 15-1046:** Implement robust student data privacy measures to protect sensitive information, respect privacy boundaries, and secure student data confidentiality.
Consideration #5: Equitable Access

The 2024 National Educational Technology Plan (NETP) recognizes technology as a powerful tool to transform learning through student-centered and personalized models. It also acknowledges the present-day failure of technology to realize its full potential to benefit all students. The 2024 NETP calls upon all education agencies to close divides in digital use, digital design, and digital access that contribute to growing inequities.

Risks

- Digital Divides may be created or exacerbated by unequal AI implementation

  > Digital Use Divide: Students who actively use digital tools including GenAI for higher level learning tasks such as analysis, creation, and evaluation are at a significant advantage over students who use it for low level activities and passive assignment completion.

  > Digital Design Divide: Teachers who receive quality ed tech professional learning are better equipped to design effective digital learning experiences for all students. A digital design divide can take place between neighboring classrooms in the same school, schools in the same district, and districts throughout the state.

  > Digital Access Divides: Teachers and students in some communities have far better access than others to the devices, internet connectivity, and resources that GenAI requires.

- Differences in exposure and use of GenAI tools can position some students to gain skills and competencies they will need to thrive in future workplaces while leaving others behind. A lack of AI skills could potentially limit students’ career opportunities.

Addressing Ethical Considerations

While it is important to understand all that is at stake for GenAI use and implementation, education leaders should also consider the incredible opportunities that implementation affords. For example, renewed attention to data privacy practices can help LEAs shore up procedures and build trust with the community. Creating a plan to strengthen AI literacy may prompt a new community partnership. Best of all, engaging teachers, staff, and students in ethical conversations about AI strengthens everyone’s understanding of humanity and citizenship in an AI-powered world.

Relevant US Regulations

- Individuals with Disabilities Education Act (IDEA): AI implementation must not deny students with disabilities equal access to education opportunities.

- Section 504 of the Rehabilitation Act: Schools must ensure that students with disabilities have equal access to digital content, technologies, and platforms, including AI.

Human Oversight:
Humans serve as a safeguard to ensure that GenAI is used in pursuit of educational and societal goals providing oversight along the way.

“Engaging teachers, staff, and students in ethical conversations about AI strengthens everyone’s understanding of humanity and citizenship in an AI-powered world.”
To help education leaders envision and operationalize the opportunities of responsible implementation, we provide the following recommendations.

**Recommendations**

1. **Educate and Train:** Train teachers, staff, students, and community members to recognize, evaluate, and challenge bias and misinformation in generated content. Training should also help individuals recognize personal values that influence the interpretation of biased content.

2. **Hold Ed Tech Companies to Ethical Standards:** Evaluate educational technology companies’ ethical commitment; include contractual clauses related to ethical compliance when procuring ed tech services.

3. **Prioritize AI Literacy and other “new literacies”:** Adults and students alike need training to effectively and ethically navigate an AI-powered landscape. Build AI and other new literacies into the curriculum across grade levels and provide ongoing professional development for teachers and staff.

   - **AI Literacy:** AI literacy includes the knowledge and skills that enable humans to critically understand, use, and evaluate AI systems and tools safely and ethically (Digital Promise, 2024).

   - **Digital Literacy:** Digital literacy involves the ability to access, manage, understand, integrate, communicate, evaluate, and create information safely and appropriately through digital technologies (UNESCO, n.d.)

   - **Media and Information Literacy:** Media and information literacy teaches how information is created, packaged, and disseminated, and encourages critical thinking skills to evaluate sources and verify information. Include training on how cognitive biases influence our perception of media and information.

4. **Revisit Existing Privacy Practices:** Use AI implementation as a good excuse to revisit existing data governance practices. Your current practices may be robust enough to account for GenAI. If not, consider it an opportunity to update and strengthen them. It is also a great time to train administrators and teachers how to safeguard student data and handle privacy challenges.

5. **Strengthen Digital Citizenship Education:** Move digital citizenship education from the back burner to the front. Instead of relegating it to an assembly or a few lessons per year, help students to make informed decisions about their digital use all the time and in meaningful ways.

6. **Evaluate Digital Access:** Assess the digital access of your entire school community to pinpoint existing gaps and barriers. Then investigate and promote appropriate solutions such as low-cost internet options from local providers like Cox’s Connect2Compete plan, federal programs such as Lifeline, and state support such as Arizona’s Broadband Initiative to bolster digital access efforts.

7. **Align to Universal Design for Learning (UDL):** Use UDL as a frame to focus AI use around greater inclusivity and accessibility for all learners.

8. **Revisit Existing Security Measures:** Review your security practices to evaluate their ability to protect against cyber threats and ensure the security of sensitive information.
While AI Literacy is an important skill for the workforce of the future, adoption should not be rushed or fully implemented without intentionality and preparation. In fact, AI implemented poorly may be worse than not implementing AI at all due to what is at stake if certain safety and ethical measures are not in place.

To assist education leaders thoughtfully implement GenAI we recommend a three-phase implementation structure which was informed by the TeachAI Toolkit’s Framework for Incorporating AI in an Education System.

1. Create a Strong Foundation
2. Build Momentum
3. Continuous Improvement

**Human Oversight:**
Keep the human in AI! Refer to resources such as the Artificial Intelligence and the Future of Teaching and Learning: Insights and Recommendations policy document (US ED, 2023) to guide implementation, ensuring that human values and ethics remain central.
Stage 1 - Create a Strong Foundation

Build a stakeholder group and task force to review policy, develop guidelines, and prepare a timeline for AI implementation.

- **Convene a Task Force:**
  Identify individuals to carry out tasks and develop a timeline associated with AI implementation and associated professional development. Consider curriculum directors, IT directors, education technology specialists, and other LEA and site leaders.

- **Create a Stakeholder Group:**
  Identify and invite stakeholders to help conceptualize GenAI within the context of LEA priorities and initiatives. Together, think through the shared values of the community to develop organizational stances on AI integration. Include all stakeholder groups in the development of guiding principles including district leaders, school staff, parents, students, community partners, tribal leaders, etc.

  Topics to be explored:
  - Alignment of AI to LEA mission and vision
  - Stance on plagiarism/cheating with AI
  - Equity, inclusion, and access for all learners
  - Safe, responsible, and ethical usage by staff and students
  - Applicable federal laws that protect student data

- **Review and Update Policy:**
  - Review existing policy. Many of the current technology related policies cover the concerns that district leaders have about the implementation of GenAI. ASBA members should start with policy IJNDB. Trust Model Policy members should start with policy 3-403.
  - Update or create new policy to mitigate risks posed by new technology. Bring policy recommended changes to association attorneys and present to the school board for changes.

- **Review Existing Guidelines:**
  Instead of creating separate rules specific to AI use, start by reviewing guidelines already in place. Depending on their currency and strength, it may take only minor revisions to account for GenAI use.
  - Student Code of Conduct
  - Acceptable Use Policy for Technology Use
  - Academic Integrity Statement
  - Discipline Procedures

Refer to this readiness checklist from CGCS and COSN.
Stage 2 - Build Momentum

Expand the small group of key stakeholders from stage one to a broader audience. As you build momentum, remain rooted in your LEA’s overarching vision for GenAI adoption, legal and ethical practices, and long-term aspirations for the growth and development of staff, students, families, and the community.

• Recruit and Support Early Adopters:
  > Early adopters who explore and experiment with new technologies pave the way for innovation in education.
  > Encourage early adopters to share their experiences and insights with peers to foster a collaborative learning culture within the district and scale best practices.
  > Leverage the experiences of early adopters to identify potential challenges associated with AI implementation so that issues can be addressed early on. For example, they can serve as “white hats” specifically tasked with attempting to break, abuse, and identify vulnerabilities and security issues in all AI models considered for broader adoption.
  > Look for the success gems of early adopters, then celebrate and share widely! Early wins can create a buzz of success that can help reduce anxiety for those who are more resistant.

• Unblock AI-powered Tools:
  > Determine which AI tools to allow access for teacher and staff use.
  > Determine which AI tools to allow access for student use.
  > As GenAI tools are unblocked and permitted for use, remind staff how to protect student data when using them.

• Build Exposure and Provide PD:
  > Provide ongoing professional development opportunities that expose instructional and non-instructional staff to GenAI tools and applications, alongside responsible use and ethical considerations.
  > Share how the district mission and vision align with the implementation of AI with staff, students, and families.
  > Work with stakeholders to help them rethink plagiarism/cheating in light of GenAI integration.
  > Introduce common language that teachers can use to establish GenAI use. The AI Stoplight from Agua Fria USD is one example.
  > Continue to involve families - ask for ongoing input, provide learning opportunities, and communicate regular updates.

• Develop an AI Literacy Plan:
  > Involve multiple stakeholders in the development of an AI literacy plan that includes curriculum and professional development.
  > Make clear how AI literacy and integration support students to develop skills included Arizona’s Academic Standards.

• Initiate Cross-Sector Conversations:
  > Engage non-classroom staff (e.g., HR, finance, transportation, facilities) in conversations about how AI may support their department’s operations.
Stage 3 - Continuous Improvement

Continuous Improvement is crucial for any design or implementation project. While all technology evolves quickly, GenAI seems to be growing daily. This means that it will be impossible for any plan to remain accurate for long. Focus on feedback and goal-setting, understanding that doing so will help bring clarity to the task force. As staff becomes more AI literate, you will be able to further leverage the power of AI to meet broader district goals.

• **Regular Monitoring:**
  > Continuously monitor emerging technologies and adjust policies, practices, and procedures as necessary. Stay vigilant for transformative changes to teaching and learning methodologies and congruence with system values.

• **Continual Professional Development:**
  > Provide ongoing professional development for GenAI implementation inside and outside of the classroom that integrates the technology with pedagogy, content, and ethical use.
  > Create and monitor a plan to develop AI literacy in age-appropriate and safe ways.

• **Ethics and Bias Evaluation:**
  > Continuously delve into ethics and bias conversations among leadership teams.
  > Engage teachers and staff in continuous learning, enabling them to apply AI ethics to their implementation and teaching.

• **Context-Specific Evaluation:**
  > Develop an evaluation process to determine whether AI implementation is meeting your LEA-specific goals.
  > Develop measurements to gauge how well the plan addresses AI literacy goals.

• **Revision and Adaptation:**
  > Continuously review outcomes of implemented strategies, solicit feedback from stakeholders, and analyze data to identify areas for improvement.
Conclusion and Next Steps

We have already glimpsed the potential of GenAI to change education, the workforce, and the way we “do life”. Fellow educators, we are called to recognize these shifting sands and adapt to an ever-evolving digital world powered by Artificial Intelligence. This includes preparing students for a future increasingly powered by AI.

The Arizona Institute for Education and the Economy and the Core AI Guidance Team see the incredible opportunity we have to grab hold of emerging technologies and use them to improve education and make the world a better, more equitable place. We hope our guidance can be a useful tool for all LEAs who are ready to embark on this exciting journey.

Consider the following to guide your next steps:

- **Starting with zero AI momentum in your district and no idea where to start, but feel like you should do something?**
  
  Find a partner, someone to begin crafting a plan with. Share this Guidance document with them, and once you have your head around it, focus on the Implementation section. Call a needs meeting and set a vision that is aligned with your LEA’s strategic plan.

- **Are you the only one around who thinks you need an AI Strategic plan? How do you win friends and influence people?**
  
  First, know that you AREN’T the only one around. Look for your early adopters. You DO have staff members or community members with thoughts. Call them together for a facilitated conversation about the direction of AI implementation and create your task force from that group, having already conducted your first needs assessment.

- **Already have an AI implementation plan?**
  
  Use this document to audit what you have done and what you are planning. Engage with other groups in the state to share resources and improve each other.
Additional Resources

General Resources and Research
- aiEDU
- ISTE: Artificial Intelligence in Education Resource Collection
- Learn 21: Generative AI Annotated Bibliography and AI Video Series
- Microsoft: Education AI Toolkit and AI in Education Research
- Teach AI
- European Commision: Ethical Guidelines on the Use of Artificial Intelligence (AI) and Data in Teaching and Learning for Educators
- US Department of Education Office of Educational Technology: Artificial Intelligence and the Future of Teaching and Learning

Technology Bias, Ethics, and Justice
- Kapor Foundation: Responsible AI and Tech Justice: A Guide for K-12 Education

Data Privacy
- Future of Privacy Forum: Student Privacy Compass
- Consortium for School Networking (CoSN): Student Data Privacy Toolkit
- Access for Learning (A4L): Arizona Student Privacy Alliance (AZSPA)

Academic Integrity
- Matt Miller, Ditch that Textbook: AI in the Classroom: What’s Cheating and What’s OK?
- Sarah Elaine Eaton, PhD: 6 Tenets of Postplagiarism: Writing in the Age of Artificial Intelligence
- Leon Furze: The AI Assessment Scale: Update and Pilot Study

AI Literacy Lessons
- aiEDU: Teach AI Classroom Curricula
- Code.org: AI Curricula
- Common Sense Media: AI Literacy Lesson for Grades 6-12
- MIT: Day of AI Curriculum
- MIT: An Ethics of Artificial Intelligence Curriculum for Middle School Students
- Stanford Graduate School of Education: CRAFT AI Literacy Resources

AI Leadership and Implementation:
- ILO Group: Framework for Implementing Artificial Intelligence (AI) in K-12 Education
- Teach AI: Guidance for Schools Toolkit
- Common Sense: AI and Our Kids: Common Sense Considerations and Guidance for Parents, Educators, and Policymakers

Professional Development:
- Google: Grow with Google Generative AI for Teachers
- Code.org: AI 101 for Teachers
- AI For Education: An Essential Guide to AI for Educators
Generative Artificial Intelligence in K-12 Education | Guidance for Arizona Schools and School Systems

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