



Re: FR Doc. 2023–11346, National Priorities for Artificial Intelligence

To the Office of Science and Technology Policy,

Thank you for the opportunity to comment on National Priorities for Artificial Intelligence. We serve as members of the [Modern Language Association](#) and [College Composition and Communication Joint Task Force on Writing and Artificial Intelligence](#). The MLA, with over 20,000 members, is the largest organization of language and literature teachers in the world. CCCC, a chartered conference of the National Council of Teachers of English, is the world's largest membership body for writing and composition research and teaching. Together, we represent a large and diverse constituent of educators. This task force, composed of scholars and teachers with collective expertise in writing, literature, and languages, is charged by our professional organizations to take stock of the current state of artificial intelligence and to identify implications for teachers, students, organizations, and citizens and map out promising directions in research for learning more about the impact of AI in writing, literature, and language classrooms.

In these remarks, we raise concerns about the impact of artificial intelligence on students' learning and the role of educators in preparing citizens with the reading, writing, and critical thinking skills necessary for participation in democracy. We assert that generative AI tools should be regulated in a way that safeguards and advances information integrity, which is essential to equitable democratic participation and to providing students with the educational experiences that will help them fully participate in and advance democracy.

[#2: How can the principles and practices for identifying and mitigating risks from AI, as outlined in the Blueprint for an AI Bill of Rights and the AI Risk Management Framework, be leveraged most effectively to tackle harms posed by the development and use of specific types of AI systems, such as large language models?]

We call for the Blueprint for an AI Bill of Rights' provision that citizens "should know that an automated system is being used and understand how and why it contributes to outcomes that impact" them to be interpreted and applied capaciously. AI users should know when and how content is generated by an AI tool. This will allow human knowledge to be credited, traced, and verified. Otherwise, AI users may unknowingly consume AI-generated material with the assumption that it is created by a human who claims responsibility for its veracity and has intentions grounded in an awareness of others.

[#10 What are the unique considerations for understanding the impacts of AI systems on underserved communities and particular groups, such as minors and people with disabilities? Are there additional considerations and safeguards that are important for preventing barriers to using these systems and protecting the rights and safety of these groups?]

We call for consideration to linguistic diversity and justice in the regulation of AI that attends to the harms inherent in a technology that, while making the language of power available to a broader array of people, also continually reinforces inequities of existing language systems. Generative AI has the potential to hurt marginalized groups disproportionately. LLMs exacerbate linguistic injustice by uncritically privileging standardized English usage aligned with dominant racial and economic power structures. Worldwide, they may also endanger the future of rare and indigenous languages and perpetuate the dominance of English.

[#15: What are the key challenges posed to democracy by AI systems? How should the United States address the challenges that AI-generated content poses to the information ecosystem, education, electoral process, participatory policymaking, and other key aspects of democracy?]

We call for regulations that require labeling of AI content (whether through version history, watermarking, or other methods for tracking provenance). Through all robust legislative and regulatory means possible, the U.S. should require software companies to develop such features in order to distribute them in U.S. markets. While technical methods for labeling AI text may not be foolproof, we nonetheless maintain that regulation requiring an indication of provenance will promote ground rules and frameworks that will reduce disinformation in society and academic integrity more specifically. The proliferation of unlabeled AI content that lacks clear delineation between human and machine output threatens education and democracy by disincentivizing learning and thus the development of the citizenry needed for participatory democracy. An indication of provenance in AI tools will give students guidance about appropriate and inappropriate use of generative AI in the learning process and a foundation for accountability. Without it, they may submit generative AI outputs as their own work, depend upon generative AI summaries of texts rather than reading, fail to see writing and language study as valuable since machines can mimic these skills, and miss the essential role of writing and reading processes in critical thinking and decision making—key skills for civic participation and knowledge building. Such regulation will also help promote academic integrity. Scholarship acknowledges that not all cheating and related learning loss can be prevented, but structures that encourage academic honesty and make dishonesty harder can substantially reduce incidence of violations and associated harms. We must make it easier for students to make ethical choices.

We call for transparency around the corpus of texts used to train AI systems and for AI systems to make clear the human source of information that informs a particular output wherever possible, whether through citation, linking, or other appropriate means, so that users can understand the context of information and verify and vet it.

We call for legal scrutiny of the unpermitted use of copyrighted and private texts to train the language models and for special protections for student data.

We call for support for teachers at all levels as we adapt our teaching methods and materials. If we want to prepare an educated citizenry to interact critically with AI-generated content, the United States must provide resources to educators. However, we think it essential to recognize that given the scale of the time and resource commitment required of teachers and institutions, existing educational institutions and funding streams are not adequate to support the rapid development of curricula for critical AI literacy to supplement existing digital literacy curricula. By critical AI literacy we mean the nature, capacities, and risks of AI tools as well as how they might be used. A recent survey of our combined memberships indicates that most faculty who responded appear to lack policy guidance from their institutions (86%) and have been hesitant to change what they are doing in their own classroom policies (79%). A broader societal investment is needed to support development of curricula, implementation of professional development, and adaptation of course structures.

[22. What new job opportunities will AI create? What measures should be taken to strengthen the AI workforce, to ensure that Americans from all backgrounds and regions have opportunities to pursue careers in AI, and otherwise to prepare American workers for jobs augmented or affected by AI?]

We call for broad-ranging investment in teaching the workforce critical AI literacy—that is, the nature, capacities, and risks of AI tools as well as how they might be used. We urgently need to invest in training current and future workers with the literacy skills that will help them understand how workplaces and work itself will fundamentally change with the integration of AI. These developments in generative AI create an urgent need for humanities educators, who are empowered and positioned to help those learning AI use and respond thoughtfully to this transformational technology.

In closing, we believe the MLA, CCCC, and similar organizations are uniquely positioned to provide input and guidance on the impact of AI technologies on writing, reading, and thinking in higher education and beyond. And either we, or leadership from the organizations we represent, should be part of any policy conversations going forward as representatives of major stakeholders in the educational system.

The sources for the research cited above can be found at the end of this comment. Please take this research under consideration when considering the national priorities for artificial intelligence.

Respectfully submitted,

Conference on College Composition and Communication and Modern Language Association
[Joint Task Force on AI and Writing](#)

Bibliography

Kreps, Sarah, and Douglas L. Kriner. "The Potential Impact of Emerging Technologies on Democratic Representation: Evidence from a Field Experiment." *New Media and Society* (2023). <https://doi.org/10.1177/14614448231160526>.

Lancaster, T. "Artificial Intelligence, Text Generation Tools and ChatGPT – Does Digital Watermarking Offer a Solution?" *International Journal of Education Integrity* 19, no. 10 (2023). <https://doi.org/10.1007/s40979-023-00131-6>.

Milano, S., J. A. McGrane, and S. Leonelli. "Large Language Models Challenge the Future of Higher Education." *Nature Machine Intelligence* 5 (2023): 333–34. <https://doi.org/10.1038/s42256-023-00644-2>.

Nicholas, Gabriel, and Aliya Bhatia. "Lost in Translation: Large Language Models in Non-English Content Analysis." Center for Democracy and Technology, 2023. <https://cdt.org/insights/lost-in-translation-large-language-models-in-non-english-content-analysis/>.

Okerlund, Johanna, et al. "What's in the Chatterbox? Large Language Models, Why They Matter, and What We Should Do About Them." Ford School of Public Policy, April 2022. <https://stpp.fordschool.umich.edu/research/research-report/whats-in-the-chatterbox>.

Rasul, Tareq, et al. "The Role of ChatGPT in Higher Education: Benefits, Challenges, and Future Research Directions" *Journal of Applied Learning and Teaching* 6, no. 1 (2023). <https://doi.org/10.37074/jalt.2023.6.1.29>.

Tate, Tamara P., et al. "Educational Research and Ai-generated Writing: Confronting the Coming Tsunami." EdArXiv, January 10, 2023. <https://doi.org/10.35542/osf.io/4mec3>.