Report

LESC Artificial Intelligence Working Group

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Executive Summary

The rapid emergence of artificial intelligence (AI) is reshaping nearly every sector of society, including public education. While AI-generated personalized tutoring platforms, lesson plans, and data dashboards offer the potential to enhance teaching and learning, they also raise important questions about data privacy, student safety, equity, and the future role of educators. Without clear and proactive policies, schools risk adopting AI in ways that are uncoordinated, inequitable, or outright dangerous to students and educators.

Recognizing the complexity of AI in education, LESC endorsed and the New Mexico House of Representatives signed House Memorial 2, requesting LESC to convene a diverse, multidisciplinary AI working group to study the technology and recommend policies to expand access while keeping New Mexico data safe and secure.

As requested in House Memorial 2, LESC staff convened a working group representing perspectives across the education continuum to discuss the implications of AI in education and develop policy recommendations for consideration by LESC. Over the course of three virtual meetings and one in-person meeting at the New Mexico State Capitol, the working group reviewed recent AI policy developments in New Mexico, evaluated promising AI tools, studied national trends, and drafted a set of policy recommendations tailored to the state's specific needs. Members emphasized the importance of policies that not only protect students and educators, but also enable responsible innovation and ensure all students can benefit from the opportunities AI may offer.

The working group developed and expanded upon four policy pillars to guide New Mexico's approach to AI in public education:

- **Promote and evaluate access to AI tools** by ensuring all students can access safe, effective AI tools through funding mechanisms, infrastructure investments, and a statewide vetted tool list (*page 9*).
- **Drive effective implementation and deter ineffective use** by establishing a dedicated AI oversight body, requiring implementation plans at the local level, and investing in statewide professional development on AI literacy, pedagogy, and ethics (*page 10*).
- **Create and enforce laws to protect student safety, data privacy, and sovereignty,** including clear legal guardrails for vendor contracts and enforcement mechanisms for noncompliance (*pages 11-12*).
- **Consider system-wide changes to prepare for a future replete with AI,** such as updating academic content standards to include AI literacy, rethinking student assessment systems, and supporting local innovation through district- and school-level AI leadership (*page 13*).

This report details the topics studied by the LESC AI working group, sharing insights about the roles and responsibilities of the Legislature, the Public Education Department (PED), local leaders, educators, and students and families in ensuring ethical and effective AI use. The report concludes with detailed recommendations for state policymakers to develop a systemic, statewide approach to AI in education that is strategic, equitable, and responsive to the rapidly changing landscape of AI.

Key Takeaways

- The Public Education Department published AI guidance for public schools in 2025 *(Pages 2-3).*
- The working group's review of several promising AI tools highlighted needs for state-level policies *(Pages 4-5).*
- Nationally, many states are developing policies to address AI uses in research, academic, and nonacademic settings *(Page 6).*
- The LESC AI working group's recommendations envision a system of supports for effective local AI tool implementation, as well as specific guardrails in statute for data privacy and security (*Pages 9 -14*).

Working Group Meetings and Research Topics

The LESC AI Working Group held four meetings throughout June and July 2025, beginning with discussions of the work currently taking place in New Mexico, analyzing the benefits and risks of AI tools in educational settings, understanding policy considerations in a broader national context, and developing formal policy recommendations for LESC's consideration.

Meeting 1: New Mexico AI Policy Landscape.

During its first meeting, the working group studied ongoing AI policy work at PED and Future Focused Education, an Albuquerque-based nonprofit organization that supports community voice to drive innovation and transformation of educational systems. After reviewing PED's AI guidance, published in May 2025, as well as an AI policy brief from Future Focused Education, the working group collaboratively set goals for what it planned to accomplish during its short time together in summer 2025.

Future Focused Education AI Policy Brief. Future Focused Education convened education stakeholders throughout the 2024 legislative interim to discuss policies that might be necessary to govern AI uses in education. The nonprofit compiled findings from stakeholder convenings into a policy brief that includes five potential areas for future policy development:

- *Equity, Inclusion, and Tribal Sovereignty.* New Mexico's AI policies should support equitable, inclusive access to AI tools. Policymakers should engage with tribal communities as sovereign nations with control over their data, allowing protections to be negotiated as leadership changes.
- *Ethical and Cultural Protection in Education.* New Mexico's AI policy should provide a clear definition of "ethical AI use" in classrooms to protect student privacy and cultural backgrounds.
- *Unified Approach to State AI Implementation.* New Mexico's AI policy should establish statewide expectation to consolidate disparate AI projects and enable collaboration across the state. This may include a framework that affords state oversight while still leaving space for local adaptation and flexibility.
- *Implementation Roadmap.* New Mexico's AI policy should develop a practical, actionable AI implementation plan for educators, students and communities. The plan should promote meaningful, real-world applications of the technology.
- *Inclusive AI Workforce Development.* Students should be prepared for roles in an AI-driven workforce. New Mexico's policy should consider workforce needs and support educational pathways in AI. Students should be able to actively participate in the design and ownership of AI tools used in educational settings.

PED AI Guidance. On May 1, 2025, PED published the New Mexico AI Guidance for K-12 Education, a handbook designed to support educators in navigating the rapidly evolving world of artificial intelligence. The AI guidance provides an overview integrating AI in educational settings by focusing on several elements of effective AI use:

- *Human-Centric AI.* The guidance urges educators to use AI in ways that support and enhance their capacity to maintain human relationships in classrooms. For example, if students receive tutoring from an AI chatbot, an educator should also be present to provide guidance and support. Human-centric AI use involves careful exploration of topics through a "four-I" framework (inquiry, input, interpretation, insight), where humans use AI as a tool that allows deeper exploration of a topic of interest, but interpret and generate insight using their own critical thinking skills.
- *AI Literacy.* The guidance provides learning standards to help students learn how AI works, what it does, and what it cannot do, at every grade level. In early grades, educators are encouraged to introduce AI concepts, model ethical and effective AI use in lessons, and help students recognize that AI can contain bias and make mistakes. In later grades, students can begin to use AI to visualize data, analyze how AI systems work, build their own AI models, and analyze the cultural and global impacts of AI.

- *Integrating AI in Classrooms.* The guidance provides examples of how AI can be integrated in academic settings, urging educators to ensure AI use is aligned with curriculum standards but encouraging its use to automate routine tasks and create efficiencies. For example, AI tools can quickly identify learning gaps, tailor lessons to individual students' needs, or provide real-time feedback to students as they work. When used effectively, AI can enhance students' critical thinking, but effective use requires educators to ask guiding questions, such as "what assumptions is the AI making" or "how do these results compare to other evidence we've reviewed?"
- *Academic Integrity*. Educators have begun grappling with difficult questions about how to address students who have clearly used AI to complete an assignment. The guidance states a clear core principle: all submitted work should reflect a student's own understanding, effort, and originality, even when supported by AI tools. Educators can help set clear expectations for how students can use AI by tagging each assignment with an "AI scale" describing how AI can be used throughout the assignment, ranging from "no AI" to "AI exploration" (See **Figure 1: AI Assessment Scale** below). In addition, school districts and schools are urged to establish districtwide policies to address academic misconduct, helping set standardized expectations for students and families about what happens when AI is used dishonestly.

Figure 1: AI Assessment Scale

1	NO AI	The assessment is completed entirely without AI assistance in a controlled environment, ensuring that students rely solely on their existing knowledge, understanding, and skills.	You must not use AI at any point during the assessment. You must demonstrate your core skills and knowledge.
2	AI PLANNING	AI may be used for pre-task activities such as brainstorming, outlining and initial research. This level focuses on the effective use of AI for planning, synthesis, and ideation, but assessments should emphasize the ability to develop and refine these ideas independently.	You may use AI for planning, idea development, and research. Your final submission should show how you have developed and refined these ideas.
3	AI COLLABORATION	AI may be used to help complete the task, including idea generation, drafting, feedback, and refinement. Students should critically evaluate and modify the AI suggested outputs, demonstrating their understanding.	You may use AI to assist with specific tasks such as drafting text, refining and evaluating your work. You must critically evaluate and modify any AI-generated content you use.
4	FULL AI	AI may be used to complete any elements of the task, with students directing AI to achieve the assessment goals. Assessments at this level may also require engagement with AI to achieve goals and solve problems.	You may use AI extensively throughout your work either as you wish, or as specifically directed in your assessment. Focus on directing AI to achieve your goals while demonstrating your critical thinking.
5	AI EXPLORATION	AI is used creatively to enhance problem-solving, generate novel insights, or develop innovative solutions to solve problems. Students and educators co-design assessments to explore unique AI applications within the field of study.	You should use AI creatively to solve the task, potentially co-designing new approaches with your instructor.

Source: PED AI Guidance for K-12 Education

Meeting 2: Tying Practice to Policy

At the second meeting of the LESC AI Working Group, participants learned about tools utilizing AI technology in potentially innovative ways. The working group critically analyzed the tools, providing input on the strengths and weaknesses of the tool, and explaining the roles of actors in the education system in effectively using AI tools.

Review of Promising AI Tools. Many companies are developing tools and software that bring AI into classrooms in some manner. LESC staff organized presentations from developers and schools implementing AI tools, contributing to shared knowledge of the use cases for AI in education. Analyses of several AI use cases are listed in **Table 1: LESC AI Working Group Analysis of Promising AI Tools**.

Table 1: LESC AI Working Group Analysis of Promising AI Tools

Use Case	Example Tool	Strengths	Weaknesses
Lesson Planning	Colleague.ai, a tool developed by AmplifyLearn at the University of Washington, is a comprehensive educational tool that uses AI as a "knowledgeable colleague" for educators' daily use. Among its many functionalities, Colleague.ai uses generative AI technology to create customizable standards-aligned lesson plans, using a chatbot interface allowing teachers to tweak and adjust the lesson plan next to a real-time preview.	Streamlines lesson preparation, saves time. Promotes differentiation within personalized lessons. Fully customizable, including languages other than English. Gives educators more autonomy over curriculum.	AI tools may be blocked by district administration. Little data on tool's efficacy. Not designed for use with younger learners. Unsure of model's inherent bias or ability to generate culturally responsive lesson plans.
Attendance	Edia, a San Francisco-based company, provides an attendance platform that uses AI to automate processes related to tracking student attendance and chronic absenteeism. The application sends AI-generated text messages to families when a student is absent and aggregates data about the root causes of student absenteeism, allowing school districts to focus efforts on addressing absenteeism, rather than tracking it.	Increases staff capacity by automating routine, mundane processes. Provides more data on root causes of absenteeism. Automatically analyzes data to give school districts ideas about how to intervene. Gives families a platform to access and view data.	Automatic messaging may decrease the potential for relationships with families. Districtwide adoption relies on a consistent districtwide attendance policy. Families may be reluctant to share personal, sensitive data with an AI chatbot.
Personalized Teacher Feedback	M-Powering Teachers, a tool developed by the University of Maryland, is a machine learning tool that processes classroom recordings and transcripts to identify the distribution of "talk time" between students and teachers and key moments where a teacher used a strong teaching practice. The tool can summarize recordings and email teachers a report after each lesson, giving teachers nearly immediate feedback on their classroom practices without the need for a human observer.	Teachers receive timely feedback on their instruction. Teachers can identify patterns in their lesson presentation and student engagement. Feedback is "nonevaluative" and is provided to teachers without threat of punishment.	Model may be biased to particular teaching strategies. Teachers have different teaching styles and different personalities. Non-content talk may still be valuable, especially if it is culturally responsive. Models are trained on recordings from 15+ years ago and do not reflect modern classrooms.
Tutoring and Individualized Instruction	The working group reviewed Amira and Khanmigo, two tools with AI components designed to provide students with tailored, individualized support as they work. The tools are designed to help students think through work steps associated with problems rather than simply giving students answers. The tools also have built-in evaluation mechanisms to summarize students' content acquisition, giving teachers insights into potential areas for intervention or reinforcement.	Individualized instruction without the need for teacher to design individualization. User-friendly and easy to navigate. Tools assist teachers in identifying student needs. Comprehensive tool with external integrations to other systems.	Comprehensive tools may be overwhelming; too many choices. Tools may be age restricted (students under 18 must have a parent sign up for Khanmigo). Districtwide implementation of a tool required an in-depth planning process. Educators need professional development to understand how to integrate the tool.

Source: LESC Files

Consolidated AI System Map. The working group spent time identifying the roles of actors within New Mexico's education system in the successful implementation of AI tools. LESC staff combined the system map for each of the AI tools researched into a consolidated system map for the general success of all AI tools. **Table 2: Consolidated New Mexico AI System Map** provides the Legislature with an understanding of its role in the broader educational ecosystem, as well as the roles of other actors within a system

Table 2: Consolidated New Mexico AI System Map

Roles and Responsibilities of Actors in New Mexico's Education System for Successful Deployment of AI Tools

Actor	Key Responsibilities	Needs
Legislature	Promote and evaluate access to AI tools. Create policies to drive effective implementation and deter ineffective implementation (over-reliance, misuse, environmental impact). Create and enforce laws to protect student safety, data privacy, security, and sovereignty. Consider system-wide changes that may be necessary in a world where AI is commonplace.	Accurate and timely data to evaluate effectiveness. Create a proactive, future-proof policy, rather than a reactive policy. Be patient with schools as they implement new learning tools and methods.
PED	Provide guidance on local AI policies, including model policies for districts to amend to fit their needs. Promulgate and enforce specific rules to monitor compliance with laws on data privacy and security. Identify and share resources about high-impact tools for schools to consider using. Procure statewide tools when appropriate and create statewide implementation plans for all users. Collect data on effectiveness of tools, evaluate the potential for tools to scale to additional schools and districts.	Stability in leadership to sustain AI initiatives. Strong communication with school and district leaders.
School and District Leaders	Author and implement district-level AI policies, such as codes of conduct, acceptable use policies, or responsible use policies. Procure districtwide tools when appropriate and create districtwide implementation plans for all users. Use implementation plans to set clear expectations with users about how a tool should be implemented. Create a system of support, designating time for teacher training on tools and collaboration among users. Communicate with families about AI tool use.	Guidance to create strong, responsive AI policies. Understanding of AI tools' purpose and intent. IT support. Adopt an "innovator mindset," identifying problems AI may be able to solve, connecting to innovative tools, and building a pathway to successful implementation.
Educators	Actively use AI tools, focusing on effective and responsible use. Facilitate learning, including lessons on AI literacy and modeling responsible, effective AI use. Maintain human connections with students and families.	Understanding of AI tools' purpose and intent. Time and training to learn new tools. Ability to collaborate with other educators to share best practices. Access to devices and software.
Students and Families	Actively use AI tools, focusing on responsible use. Advocate for personal needs. Provide feedback on the effectiveness of AI tools.	Awareness of and consent to use of AI tools. Consistency in tools and expectations over time. Access to devices and AI tools. Respect from other actors and opportunities to share their voices.

Source: LESC Files

Meeting 3: Developing Policy Pillars

At the working group's third meeting, participants heard presentations from the National Conference of State Legislatures (NCSL), a national organization that provides bipartisan research and technical assistance regarding trends in state legislative policies, and Indigitize, a nonprofit organization dedicated to computer science and AI-focused communities of practice for Native American educators and students. The presentations helped frame policy considerations at a national level and for New Mexico's Native American communities, helping the working group determine how it should frame its recommendations for LESC.

National Policy Landscape. NCSL provided an overview of national trends for policies related to AI in education. Nationally, 13 states have enacted legislation related to AI in education, 18 states have introduced legislation, and two states, including New Mexico, have adopted resolutions. State legislation on AI in education can loosely be sorted into three broad categories: research and practice, academic uses, and nonacademic uses.

- *AI Research and Practice.* Many states, including New Mexico, have begun to address AI by establishing working groups or task forces to study, publish guidance, and recommend policies for AI in education. Delaware, Illinois, Tennessee, and Washington have all established general AI task forces that include education among other sectors of government. California enacted SB1288 in 2024 establishing an AI working group that was tasked with developing guidance, creating a model school district policy, and identifying other ways of supporting educators. The working group's model policy includes guardrails for academic integrity, acceptable use policies, data privacy and security, procurement requirements, and effective uses of AI to support teaching and learning.
- *Academic Uses of AI.* State legislation related to academic uses of AI involves teaching and learning *with* AI, teaching and learning *about* AI, and connections between AI and the workforce. States involved in teaching and learning *with* AI, including Tennessee, have required school districts to adopt policies related to instructional use of the technology. Many other states have established grant and pilot programs to use and study the effectiveness of AI tools. Some of these grant programs relate AI to workforce needs, establishing a direct connection between AI and career technical education programs in science, technology, engineering, and math (STEM) fields. States have also established AI curriculum and standards, including computer science standards, digital literacy standards, and established AI literacy into existing curriculum frameworks. While New Mexico has formal computer science standards, the state has not formally integrated AI literacy or digital citizenship into its general academic content standards.

Members of the LESC AI Working Group discuss the strengths, weaknesses, opportunities, and threats associated with M-Powering Teachers, a tool powered by machine learning designed to generate feedback on teacher instructional practices in classroom settings.

Dr. Neal Weaver (Chief Information and Strategy Officer, Santa Fe Public Schools) presents to the LESC AI Working Group on Amira, an instructional tool that uses AI to listen to students as they complete an interactive reading lesson, providing AI-generated tutoring and scaffolded lessons for students as they work. The tool required Santa Fe Public Schools to adopt a districtwide implementation plan, including stakeholder engagement, training and professional development, internal strategy and planning, and collaboration with external stakeholders.

- *Nonacademic Uses of AI.* Finally, states have taken action to address uses of educational AI that are not strictly academic. Nevada enacted Assembly Bill 406 in 2025 prohibiting public schools from using AI to perform the functions of school counselors, psychologists, and social workers. Maryland enacted House Bill 782 in 2025 requiring the state to study best practices involving the use of AI technology in deadly weapons detection software. Six states introduced legislation funding a grant program to integrate AI technology into existing school safety software, including cameras, video management systems, and alerting protocols.

Members of the LESC AI Working Group discuss the strengths, weaknesses, opportunities, and threats associated with Edia, a tool that uses generative AI to communicate with families when a student is absent and aggregates data on root causes of student absences to guide district policy. Members agreed that the automation of routine tasks may be a benefit of the tool, but such automation has the potential to replace relationships with families, which are powerful connections that can improve attendance.

Tribal and Indigenous Data Sovereignty. Indigitize presented on the concepts of tribal and Indigenous data sovereignty, providing a common working definition of the terms and ideas on how the working group can honor sovereignty as it develops its policies. Indigenous data sovereignty refers to the inherent right of Indigenous peoples to control, manage, and protect the data pertinent to their cultures. Tribal data sovereignty is the formal expression of this concept, grounded in the legal and political authority of tribes, nations, and pueblos, to govern data related to their citizens, lands, and governments.

Members of the LESC AI Working Group discuss the strengths, weaknesses, opportunities, and threats associated with Khanmigo, a tool that uses an AI chatbot to tutor students through a given lesson. Working group members pointed out that the potential for the tool to individualize instruction is a clear strength, but the tool is limited by a security provision that requires users be over the age of 18 or have a parent or guardian sign-up on behalf of minors.

Indigenous and tribal data sovereignty are formally expressed in the 2007 United Nations Declaration on the Rights of Indigenous Peoples, which states Indigenous peoples "have the right to maintain, control, protect and develop their intellectual property of such cultural heritage, traditional knowledge, and traditional cultural expressions." In 2016, the U.S. Indigenous Data Sovereignty Network was established to convene Indigenous communities, provide research, training, and policy advocacy to safeguard the rights of Indigenous peoples related to their data. In 2020, researchers affiliated with the network published an academic article outlining the "CARE" principles for Indigenous data governance:

- *Collective Benefit.* Data must facilitate collective benefit for Indigenous peoples to achieve inclusive development and innovation.
- *Authority to Control.* Indigenous peoples must have access to data that support Indigenous governance and self-determination.
- *Responsibility.* Individuals working with Indigenous data have the responsibility to nurture respectful relationships, expand capability and capacity, and respect Indigenous languages and worldviews.
- *Ethics.* Indigenous peoples rights and wellbeing should be the focus throughout data lifecycles to minimize harm, maximize benefits, promote justice, and allow for future use.

In practice, policymakers can strive to uphold the CARE principles and tribal and Indigenous sovereignty by protecting safety, privacy, and local control over data, as well as by creating mechanisms for tribal consultation throughout the policy development process. Specific recommendations related to these topics are found in Table 3: Policy Considerations to Uphold Indigenous and Tribal Data Sovereignty.

Table 3. Policy Considerations to Uphold Indigenous and Tribal Data Sovereignty

Center Safety, Privacy, and Local Control	Create Mechanisms for Tribal Consultation
Vet AI Tools. Establish a preferred vendor list for AI tools, including specific criteria for safety, privacy, and ability of individuals and tribes, nations, and pueblos to "opt out." ***Prohibit Harmful Contracts.*** Consider banning vendors that train models using student data. Contracts with vendors should specifically state that data from tribal students cannot be used to train models without consent from the tribe. ***Regulate High-Risk Systems.*** Specifically, consider banning AI tools that mimic human companionship. Relationships, identity, and cultural integrity are core to student well-being in Indigenous-serving schools; tools that mimic human relationships have the potential to be emotionally manipulative. ***Create Accountability for Harms.*** Consider requiring vendors to undergo regular third-party audits and hold vendors accountability for breaches of contracts. Oversight bodies like tribal IRBs or Indian education offices can specifically review impacts to Indigenous students.	***Consultation via the Indian Education Act.*** Require that tribal consultation include any AI systems or data infrastructure that affects Indigenous students. ***Engage the Indian Education Advisory Council.*** Consider requiring the IEAC to provide consultation on PED's AI guidance and in the vetting of AI tools. ***Support School District and Tribal Dialogue.*** Consider requiring school districts to include data sovereignty discussions during regular tribal consultations. ***Require Vendor Compliance with Tribal Directives.*** Contracts should include provisions that honor tribal directives, including data deletion or access restrictions. ***Support Districts with Large Numbers of Native Students.*** Provide additional guidance and support for AI policy development in school districts with a large Native student population. ***Train School Boards on AI and Indigenous Data Sovereignty.*** Ensure education leaders understand AI ethics, student safety, and Indigenous data sovereignty.

Source: Indigitize

Meeting 4: Refining Policy Pillars

Based on the presentations provided and the experiences of working group members, the LESC AI Working Group developed four policy pillars, including specific recommendations for actors within each policy pillar. At a minimum, New Mexico's policy for AI in education should strive to meet the following priorities:

- *Promote and evaluate access to AI tools.* Equitable access to AI tools is essential to ensure students and educators have the opportunity to use the technology. The Legislature should establish policies and budget recommendations to determine when an AI tool should be used, how access should be promoted, and evaluate whether AI tools are improving outcomes.
- *Create policies to drive effective implementation and deter ineffective implementation.* Foundational AI literacy should be embedded across the education community, driving implementation and encouraging responsible, effective use of AI systems. This can be achieved through local AI implementation plans, PED guidance, and standards for AI literacy throughout New Mexico's curriculum standards.
- *Create and enforce laws to protect student safety, data privacy, security, and sovereignty.* The Legislature is the only actor in New Mexico's education system capable of creating binding legal safeguards for safety, data privacy, and security. Such laws should also strive to uphold Indigenous and tribal data sovereignty.
- *Consider system-wide changes that may be necessary in a world where AI is commonplace.* The advent of AI holds implications for effective use of instructional time and educator work time, as well as for the assessment of vital student skills like critical thinking.

Recommendation 1: Promote and Evaluate Access to AI Tools

Working Group Analysis: For New Mexico's students, the future will inevitably involve regular use of AI tools, making it essential to ensure all students have equitable access to this technology. Exposure to AI throughout students' educational journeys has the potential to create more inclusive and supportive learning environments. As AI becomes increasingly embedded in the modern workforce, students need early, broad exposure to a wide range of AI tools to prepare them for future careers. Introducing AI in schools also provides a critical opportunity to teach students about the ethical use of these tools, reducing the risk of systemic harm and promoting fair treatment for all learners.

Key Policy Mechanisms: Funding mechanism for AI tools (Legislature); vetted AI tool list (PED).

The Legislature should…

- ***Establish a mechanism to ensure schools receive funding for high-impact AI tools***. Many existing funding mechanisms already exist in statute to flow funding to schools for educational technology and instructional materials. While additional funding dedicated to AI tool procurement could be beneficial, promoting access may not necessarily require more funding, but rather a permission structure and guidance on approved tools to give schools the comfort to use existing funding on AI tools.
- ***Ensure policies continue to promote digital equity.*** Access to personal devices and high-speed internet are prerequisites for effective use of AI tools. In 2021, a ruling in the *Martinez-Yazzie* consolidated lawsuit determined it is the state's responsibility to ensure every student has access to the technology and infrastructure necessary for a sufficient education.

The Public Education Department should…

- ***Publish a list of AI tools vetted using objective quality criteria.*** PED should establish a vetting process for AI tools, similar to its review of high-quality instructional materials, to give districts, schools, and educators confidence to adopt AI tools in classrooms. Tools should be evaluated based on objective criteria, such as research-based effectiveness, data privacy, IT support for users, and protection of Indigenous data sovereignty.
- ***Continuously monitor and evaluate the effectiveness of AI tools.*** Shared capacity between legislative staff, PED staff, and a potential AI oversight body, could continuously evaluate the effectiveness of AI tools used in New Mexico. The state can also rely on mechanisms like the public education reform fund (PERF) to fund AI tools, requiring that any tool funded will be evaluated for its causal impact on student outcomes.

School and School District Leaders should…

- ***Identify priorities that AI tools have the potential to solve.*** As implementers, school districts and charter schools must adopt an innovator mindset to identify the best potential use cases for AI.
- ***Make spending decisions to promote equitable access.*** School and school district leaders have a unique ability to determine which students need access to devices and internet and support those students directly. Partnerships with teachers and families can identify individual student needs and guide spending decisions. School leaders can make decisions to de-implement ineffective curricula or tools to reallocate resources to other promising tools.

Educators should…

- ***Use AI tools in classrooms to enhance, not replace, teaching.*** Educators could rely on PED's vetted AI tool list to begin identifying AI tools to use in classrooms. Educators should use AI tools to spark intellectual curiosity, such as engaging in analysis of AI outputs with students.
- ***Provide clear rubrics to encourage appropriate student AI use***. Using an "AI assessment scale" sets expectations for student use of AI on individual assignments, and school policies can help provide options when AI is a factor in instances of academic dishonesty.

Recommendation 2: Drive Effective Implementation and Deter Ineffective Implementation

Working Group Analysis: To drive effective AI implementation in New Mexico's schools, state policy should prioritize equity, safety, and educator support. This includes ensuring all school districts have access to vetted AI tools, reliable infrastructure, and high-quality professional development. Teachers need training and time-saving tools to enhance instruction, while students need AI literacy integrated into digital citizenship curricula to prepare for future careers. Policies must provide clear guidance on the ethical and safe use of AI, ensure data privacy and accessibility, and encourage responsible innovation at the school district level. The state should also monitor and share outcomes to support continuous improvement. With thoughtful leadership and carefully designed implementation, AI has the potential to empower both educators and students across New Mexico.

Key Policy Mechanisms: Formal AI oversight body (Legislature, PED); AI guidance (PED, oversight body); AI implementation plans (school districts, schools).

The Legislature should…

- ***Formally assign the responsibility of AI guidance to a multidisciplinary oversight body.*** Given the speed at which AI technologies evolve, responsiveness to the ever-changing world of AI will require constant engagement by a team of experts representing multiple stakeholder groups, including educators. A new or existing council, board, independent office, or PED bureau could be tasked with vetting AI tools, publishing model AI policies, and providing professional development on AI literacy and effective use. The Legislature should evaluate whether existing administrative bodies could be adapted for this purpose; for instance, Section 22-15A-5 NMSA 1978 creates the "Council on Technology in Education," but currently, no such council exists.
- ***Require regular updates to AI Guidance and require certain topics be covered.*** The Legislature should require regular updates to New Mexico's AI guidance. The guidance must be user-friendly and actionable with explicit recommendations for high-impact strategies, ethical use, identifying bias, and protecting data privacy.

The Public Education Department should…

- ***Provide professional development opportunities for superintendents, school boards, and educators on the effective use of AI.*** To build statewide capacity, PED must offer AI-related professional development that includes ethics, pedagogy, technical implementation, and classroom integration of AI. Training should support educators and school leaders with practical tools that can be further tailored to local contexts.

School and School District Leaders should…

- ***Author implementation plans for AI tools when adopted.*** Districts and schools using AI tools should develop detailed implementation plans that outline the tool's purpose, training, data protections, "how-to" guides for users, and family communication strategies.
- ***Allocate educator time for AI-related professional development and communities of practice.*** School leaders must protect time for educators to engage in ongoing learning about AI through professional development and peer-led communities of practice, building teacher confidence, helping overcome classroom challenges, and supporting long-term integration.

Educators should…

- ***Foster AI literacy in classrooms.*** Teachers should consider how to help students understand how AI technologies work, how to use them responsibly, and how to think critically about their outputs. This approach prepares students for future workforce demands in an AI-rich world.
- ***Provide feedback on AI tools.*** Hesitation to adopt AI is natural and warranted. Teachers should engage in constant discussion with one another and with their leadership about the pitfalls and drawbacks of AI for students and educators, improving AI literacy across the education system.

Recommendation 3: Create and Enforce Laws to Protect Student Safety, Data Privacy, Security, and Sovereignty

Working Group Analysis: As AI becomes increasingly embedded in educational tools and systems, strong safeguards are essential to protect student data, uphold community trust, and ensure responsible use. New Mexico must adopt clear, enforceable policies that prioritize data privacy, security, and sovereignty, particularly for sensitive student information and tribal communities. This includes setting legal standards, equipping educators and administrators with the knowledge to mitigate risks, as well as offering safe, vetted alternatives to high-risk technologies. The following recommendations outline coordinated responsibilities for the Legislature, PED, school leaders, and educators to ensure AI use in schools is ethical, secure, and student-centered.

Key Policy Mechanisms: Minimum safety and security requirements (Legislature); enforcement mechanism (Legislature, PED); vendor contracts (PED, LEAs).

The Legislature should…

- ***Require AI tools to meet minimum data privacy, security, and sovereignty standards.*** The Legislature should establish minimum safety and security requirements in law, which may include any or all of the following provisions: prohibit vendors from using sensitive student data to train future models; provide assurances that school districts and tribal governments maintain ownership over their data; require environmental impact disclosures; require independent audits and bias testing; and provide a clear opt-out procedure for students, families, and tribal governments.
- ***Prohibit certain uses of AI tools.*** The Legislature should consider prohibiting AI practices for which the harms outweigh the benefits. For example, educators should never share sensitive student data with general purpose large language models, such as ChatGPT, and should never use AI tools to make final determinations about student grades, especially given well-documented research on bias within AI models.
- ***Create an enforcement mechanism with "teeth."*** Alongside requirements for data protection, the law should provide penalties for noncompliance for both school districts and vendors, alike. The enforcement mechanism should establish a process by which individuals and school districts can file formal complaints for violations of state law, resulting in a timely resolution that mitigates harms of the noncompliance.
- ***Ensure laws related to bullying and harassment account for the use of AI to engage in harassment.*** The Legislature should update the Safe Schools for All Students Act (Chapter 22, Section 35, NMSA 1978) to ensure school district policies are updated to prevent and address bullying with AI and other forms of technology.

The Public Education Department should…

- ***Promulgate rules to enforce legal and technical requirements for data privacy, security, and sovereignty.*** PED should work with AI and legal experts to create rules that implement the provisions of a forthcoming law. Administrative rules can define specific standards for data handling and vendor agreements offering more precision than statute alone.
- ***Publish a model AI vendor contract designed to meet the requirements of the law.*** PED should also work with experts to develop a model contract that districts can use when procuring AI tools. The contract should include clear provisions for data use limitations, student data protections, and transparency about how vendors use and store data.
- ***Provide professional development on the privacy and security risks associated with using AI tools.*** PED should deliver robust training for educators, administrators, and IT staff on the risks of AI, including data privacy, algorithmic bias, and the ethical use of AI tools. These trainings should also help schools build internal capacity to evaluate tools and make informed, secure decisions about their use.

School and School District Leaders should…

- ***Provide alternatives to public large language models for use with sensitive student data.*** Districts should identify and implement AI tools that do not rely on externally hosted large language models when handling sensitive student information, such as IEP data or disciplinary records. Locally hosted or closed-system tools should be prioritized to reduce risk and maintain data sovereignty and confidentiality.

Educators should…

- ***Teach students about the risks posed by unsafe use of AI.*** Educators should integrate lessons on AI safety into classroom instruction, helping students understand potential harms of privacy violations, bias, misinformation, and declining critical thinking, foundational concepts of AI literacy.

Recommendation 4: Consider System-Wide Changes that may be Necessary in a World where AI is Commonplace

Working Group Analysis: AI is transforming every facet of education, from how teachers plan lessons to how students learn and demonstrate understanding, yet New Mexico's educational systems remain largely static. Without responsive policies, updated curricula, and strategic support for educators, the state risks falling behind in preparing students for an AI-driven world. To ensure equitable access and meaningful integration, New Mexico must consider how to adapt its standards, professional development, and educational systems to prioritize the uniquely human skills that AI cannot replicate.

Key Policy Mechanisms: AI oversight body (Legislature, PED); academic content standards (PED); AI steering committees (school districts); AI leaders (schools).

The Legislature should…

- ***Rely on a formal AI oversight body for ongoing recommendations and capacity-building.*** A formal AI oversight body should also be tasked with statewide capacity building for sustained and targeted AI support. Activities may include providing ongoing recommendations for state policy, hosting an annual AI conference, vetting promising AI tools, and publishing a statewide "AI resource institute" to coordinate training and other resources for schools adopting AI.
- ***Begin considering how student assessment systems and instructional time requirements may need to adapt.*** In a world replete with AI, students will need strong AI literacy and critical thinking skills that are not commonly assessed by standards-based assessments. Policymakers should begin thinking about innovative ways to measure students' acquisition of higher-order skills like critical thinking. If the state begins to find that AI tools are effective at differentiating instruction and accelerating student learning, the Legislature may also wish to consider amending its instructional time laws to incentivize high-quality time.

The Public Education Department should…

- ***Promulgate rules officially adopting "AI literacy" within New Mexico's content standards.*** PED should revise and expand curriculum standards to include AI literacy, with integration into core academic subjects and career technical education. Clear standards and expectations will ensure students develop the skills to critically and ethically navigate AI in school and beyond.

School and School District Leaders should…

- ***Create districtwide AI steering committees.*** School districts and charter schools should establish committees composed of local AI leaders, including educators, administrators, IT staff, students, and families to guide the development of local AI policies, oversee implementation plans, and ensure alignment with state guidance.
- ***Designate at least one "AI Leader" at each school.*** Every school should appoint a trained AI point-of-contact responsible for supporting teachers, facilitating professional development, and serving as a liaison with the district and state. This role ensures each school has a go-to resource to stay informed about updates about AI policy and implementation techniques.
- ***Provide feedback to policymakers on adjustments that may be necessary to promote innovation.*** By sharing what's working and what's not, school and district leaders can ensure that laws and regulations remain practical and conducive to meaningful innovation. Leaders should regularly communicate with the AI oversight body, PED, and legislative partners about the impact of policies on school operations, particularly those that may be impeding innovation.

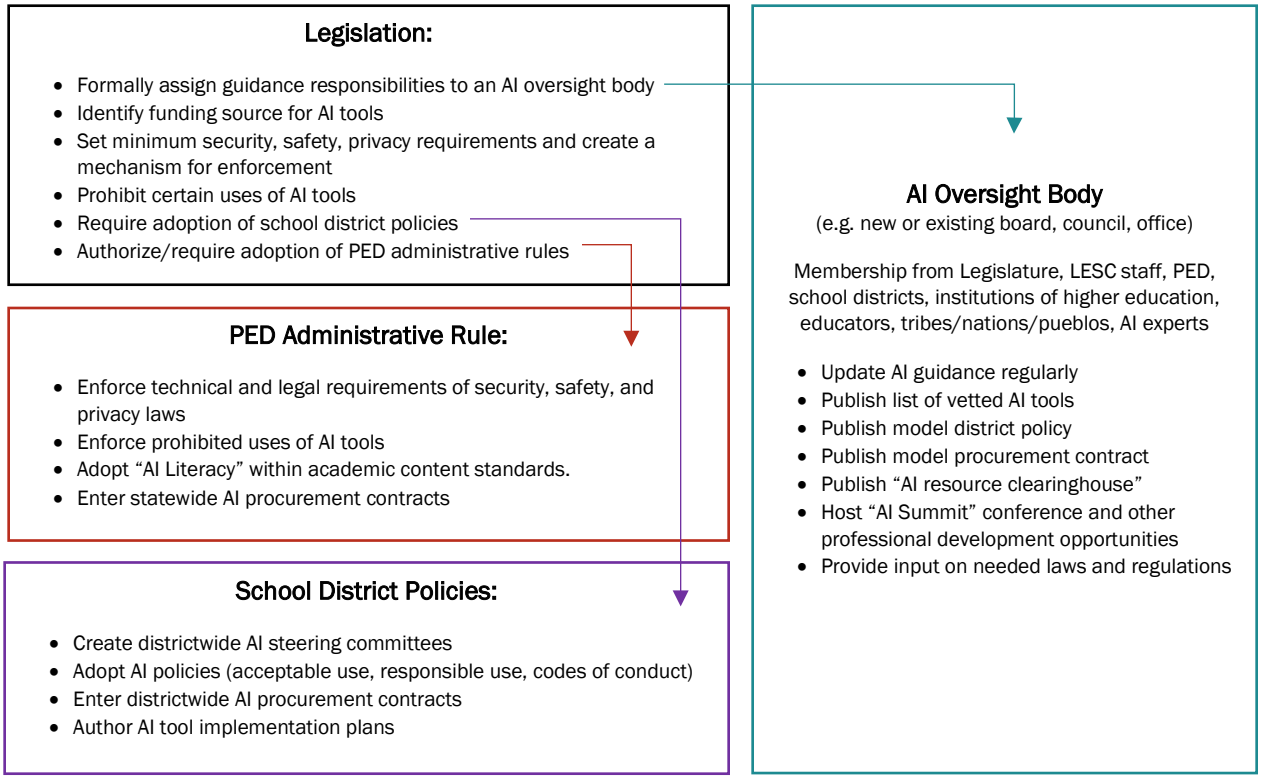
Educators should…

- ***Build proficiency with AI tools and keep up with trends and developments.*** As frontline implementers, teachers play a critical role in ensuring AI tools continue to create innovative, engaging learning environments. Educators should seek training in the use of AI tools relevant to their content areas and remain curious and evidence-driven in identifying classroom tools.

Tying it All Together: Next Steps for State Policy

Taken together, the LESC AI Working Group recommendations envision a system by which the state unites expertise regarding AI in education in a formal oversight body, responsible for providing practical, actionable guidance to schools on an ongoing basis. The role of the Legislature in this system is to formally create the oversight body in statute, then create guardrails for the oversight body, PED, and school districts and schools to foster safe, effective use of AI tools. The systemic approach to AI policy development and implementation is detailed in Figure 2 below.

Figure 2: Systemic Approach to AI Policy Development and Implementation



Source: LESC Files

As the Legislature considers this report and the details of a statewide AI policy for New Mexico's public schools, it should also take into account several final considerations that will shape the viability and integrity of the effort:

Germaneness for the Upcoming 30-Day Session. Given the germaneness rules of the upcoming 30-day legislative session, any AI policy proposals must align with the governor's agenda or demonstrate a direct connection to budget considerations. Policymakers may wish to consider early engagement with the governor's office to demonstrate the importance of the initiative, or align the legislation with budget-related matters, such as funds for initiating an AI oversight body or providing access to AI tools and devices.

Ongoing Consultation with the AI Working Group. Members of the LESC AI working group expressed an interest in continued engagement throughout the policy development process. The multidisciplinary working group of educators, administrators, researchers, and technologists, has diligently laid the groundwork for thoughtful, inclusive policy development.

Specific Consultation with New Mexico Tribes, Nations, and Pueblos. Respectful government-to-government dialogue is critical to honoring sovereignty and ensuring equitable access to AI tools. New Mexico's policy must be developed in direct partnership with New Mexico's sovereign tribal communities, providing an avenue for formal consultation to safeguard data sovereignty, cultural protection, and educational equity.

APPENDIX A: Acknowledgements

This report would not have been possible without the contributions of many individuals, including the working group participants and folks behind the scenes who helped everything come together.

First, a thank you to our working group participants. Thank you for dedicating your time and energy this summer; for many of you, it was time away from your families and loved ones during summer break. From LESC staff, we hope you enjoyed your crash-course in policy development, and we deeply appreciate the passion that each of you brings to educating the students of New Mexico.

Thank you **Paige Prescott, Enrico Pontelli, Hope Morales**, and **Aaron Jaramillo**, for helping us recruit educators to lend their voice to the working group. An additional huge thank you to **Dr. Shelley Gruenig** for your support in recruiting (and even transporting) current New Mexico students. Your contributions helped make sure the working groups recommendations are grounded in the lived realities of New Mexico classrooms.

Many thanks to presenters from across New Mexico and the U.S., who dedicated their time to building the working group's shared expertise of AI systems:

- **Tracie Benally**, Research Fellow, Indigitize
- **Dr. John Chadwick**, Digital Equity Coordinator, Public Education Department
- **Jed Duggan**, Director of Instructional Tools and Supports, Public Education Department
- **Lauren Gendill**, Education Policy Analyst, National Conference of State Legislatures
- **Molly Gold**, Education Program Principal, National Conference of State Legislatures
- **Dr. Jing Liu**, Assistant Professor of Education Policy, University of Maryland.
- **Kristie Medina**, Superintendent, Raton Public Schools
- **Nate Morrison**, Head of Strategy and Operations, Indigitize
- **Heather Summers**, Senior Program Manager for STEM Education, Project ECHO at the University of New Mexico
- **Dr. Min Sun**, Professor of Education Policy and Teacher Learning, University of Washington
- **Lashawna Tso**, Senior Director of Community Partnerships and Government Relations, Indigitize
- **Dr. Melissa Warr**, Assistant Professor of Teacher Preparation, Administration, and Leadership, New Mexico State University
- **Dr. Neal Weaver**, Chief Information and Strategy Officer, Santa Fe Public Schools

Finally, a very warm thank you to the team at LESC, including support during the working group meetings from **Evan Chavez, Natasha Davalos, Conor L. Hicks,** and **Arlo Menchaca**. Special kudos are due to **Wesley Geyer**, our summer 2025 Teacher on Special Assignment and **Sofia Gonzalez**, our summer 2025 intern; welcome to the world of education policy! Thank you to **Alonzo Baca** for helping navigate the finances and keeping us fed at our in-person convening. And of course, countless thanks to LESC Deputy Director, **Jessica Hathaway**, for her guidance in crafting meaningful, well-scoped qualitative research tasks, and to Director **John Sena**, for his tireless leadership, valuable thought partnership, and justified irreverent skepticism.

APPENDIX B: LESC AI Working Group Participants

	Name	Role	Affiliation	
1	Brian Baca	Legislator	House District 8	1
2	Christine Chandler	Legislator	House District 43	2
3	Joy Garratt	Legislator	House District 29	3
4	Yanira Gurrola	Legislator	House District 16	4
5	Denise Terrazas	State Administrator	PED	5
6	Duncan Christensen	State Administrator	PED	6
7	Jed Duggan	State Administrator	PED	7
8	Melissa DeLaurentis	State Administrator	PED	8
9	Enrico Pontelli	Higher Education	NMSU	9
10	Hope Morales	Nonprofit Organization	TeachPlus NM	10
11	Lisa Harmon-Martinez	Nonprofit Organization	Future Focused Education	11
12	Tony Monfiletto	Nonprofit Organization	Future Focused Education	12
13	Paige Prescott	Nonprofit Organization	Computer Science Alliance	13
14	Alexander Jacobson	Technical Expert	Oforma.ai	14
15	Trey Smith	Charter Administrator	East Mountain High School	15
16	Gene Strickland	District Administrator	Hobbs	16
17	Kristie Medina	District Administrator	Raton	17
18	Barbie Pierson	Educator	Albuquerque	18
19	Danielle Gurnea	Educator	Las Cruces	19
20	Erin Armijo	Educator	Albuquerque	20
21	Francine Binnert	Educator	Cottonwood Classical Preparatory School	21
22	Jaycie Homer	Educator	Lovington	22
23	Jeri Lyn Manzanares	Educator	Santa Fe	23
24	Jessica Harmon	Educator	Albuquerque	24
25	Kristina Kennedy	Educator	Albuquerque	25
26	Marc Valdez	Educator	Cuba	26
27	Marion Markham	Educator	Santa Fe	27
28	Melanie Bussiere	Educator	TeachPlus NM	28
29	Michael Bellamy	Educator	Native American Community Academy	29
30	Nate Raynor	Educator	Mescalero Apache Schools	30
31	Trevor Rabourn	Educator	Ruidoso	31
32	Windey McKelvie	Educator	Cloudcroft	32
33	Andrew Procter	Student	East Mountain High School	33
34	Autumn Solecki	Student	Central New Mexico Community College	34
35	Kaleb Hanes	Student	New Mexico Institute of Mining and Tech.	35

AGENDA

LESC Artificial Intelligence Working Group

Meeting 1: Introductions, Policy Landscape, and the Work Ahead

June 4, 2025

Virtual Meeting (via Zoom)

9:00	(1)	Introductions / Overview of LESC
9:15	(2)	House Memorial 2 and Working Group Norms
9:30	(3)	New Mexico AI Landscape

A. Public Education Department (PED) AI Guidance.

Jed Duggan, Director, Instructional Tools and Supports, PED

John Chadwick, Ed.D., Digital Equity Coordinator, PED

B. Future Focused Education (FFE) AI Framework.

Lisa Harmon-Martinez, Director, Learning by Doing, FFE

10:15		Break (15 Minutes)
10:30	(4)	Activity: Taking Inventory and Setting Goals (Small Group Activity)
11:30		Adjourn

AGENDA

LESC Artificial Intelligence Working Group

Meeting 2: Tying Practice to Policy

June 13, 2025

New Mexico State Capitol, Room 307

9:00 (1) Quick Re-introductions and Recap of Meeting 1

9:30 (2) Promising Use Cases in for AI in Education

- **A. 9:30 Lesson Planning** (Colleague.ai)
  Min Sun, Ph.D., Professor of Education Policy and Teacher Learning, University of Washington
- **B. 10:00 Attendance** (Edia)
  Kristie Medina, Superintendent, Raton Public Schools
- **C. 10:30 Personalized Teacher Feedback** (M-Powering Teachers)
  Jing Liu, Ph.D., Assistant Professor of Education Policy, University of Maryland
- **D. 11:00 Individualized Instruction** (Khanmigo)
  Heather Summers, NBCT, Senior Program Manager for STEM Education, Project ECHO at the University of New Mexico
- **E. 11:30 Individualized Instruction** (Amira)
  Neal Weaver, Ph.D., Chief Information and Strategy Officer, Santa Fe Public Schools

12:00 Lunch (Provided by LESC in Rotunda)

1:00 (3) **Recognizing and Mitigating Bias in AI Models**
Melissa Warr, Ed.D, Assistant Professor of Teacher Preparation, Administration, and Leadership, New Mexico State University

1:45 (4) Small Group Activity – SWOT Analysis of AI Tools

2:30 Break

2:45 (5) Small Group Activity – Roles and Needs of Actors

3:45 Debrief and Next Steps

AGENDA

LESC Artificial Intelligence Working Group

Meeting 3: Developing Policy Pillars

June 18, 2025

Virtual Meeting (via Zoom)

9:00	(1)	**National Policy Landscape for AI in Education** Molly Gold, Education Program Principal, National Conference of State Legislatures (NCSL) Lauren Gendill, Education Policy Analyst, NCSL
9:45	(2)	**Understanding Tribal Data Sovereignty and AI** Lashawna Tso, Senior Director of Community Partnerships and Government Relations, Indigitize Tracie Benally, Research Fellow, Indigitize Nate Morrison, Head of Strategy & Operations, Indigitize
10:30		Break
10:40	(3)	Developing Policy Pillars (Small Group Activity)
11:30		Adjourn

AGENDA

LESC Artificial Intelligence Working Group

Meeting 4: Refining Policy Pillars

July 2, 2025

Virtual Meeting (via Zoom)

9:00	(1)	Reconvene Small Groups – Final Reflections on Pillars
9:30	(2)	Small Groups – Developing Recommendations
10:30		Break
10:35	(3)	Large Group Share – Recommendations
10:50	(4)	Final Thank You and Next Steps