

The AI Divide

Equitable Applications of
AI in Higher Education to
Advance the Completion Agenda



A position paper on AI, access, and digital tools as levers for equity in higher education.

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**COMPLETE
COLLEGE
AMERICA**

In partnership with:



T3 ADVISORY

The AI Divide: Equitable Applications of AI in Higher Education to Advance the Completion Agenda

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About Complete College America

Complete College America (CCA) builds movements for scaled change and transforms institutions. Specifically, CCA drives systemic change that leads to better college completion rates; more equitable outcomes; and greater economic and social mobility, especially for historically excluded students. CCA operates at the federal, state, and institutional levels and works with its national network of forward-thinking state and higher education leaders. Since its founding in 2009, CCA and its network have introduced bold initiatives that help states and institutions implement data-driven policies, student-centered perspectives, and equity-driven practices.

About T3 Advisory

T3 Advisory partners with higher education institutions and national organizations to chart a strategic path forward in today's complex landscape of technology and postsecondary student success. Our work leverages data analysis, strategic planning, and process improvement to build capacity for sustainable change.

Founded in 2023 by Audrey Ellis, T3 Advisory brings more than 10 years of higher education expertise. We aim to equip our partners with insights on new technology to advance student success, especially for historically excluded students and the institutions that serve them. Our customized services help leaders make sense of challenges and seize opportunities.

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EXECUTIVE SUMMARY

In this position paper, we will lay out the imperative for equitable artificial intelligence (AI), highlighting the essential role of access-oriented institutions and calling on technology companies (both large and small), foundations, and local, state, and federal regulators to consult with our newly convened Complete College America Council on Equitable AI in Higher Education. We believe that equitable AI spans far beyond the risk of mis-trained data. How schools adopt or reject these tools, the priorities of AI vendors, access to resources that enable the use of these tools, and the systemic integration of historically underrepresented and underserved voices will shape whether technology amplifies privilege or fosters inclusivity.

We present a three-fold framework for understanding Equity in AI, considering not just the quality and unbiased nature of the data used to train generative AI machines but also who has access to conversations around policy and product, as well as which institutions have access to the resources and safety nets that enable innovation and experimentation in the field of AI. As we see it, the stakes of equitable AI are high and span far beyond perpetuating bias through generative AI output: we must prevent AI from becoming another lever of social mobility for students who have access to elite, highly selective colleges and universities and a gaping hole on the transcript or resume of students who attended the vast majority of higher education institutions in the United States. So, who has access to learn about and with AI?

We propose a disruptive new advisory council, the Complete College America Council on Equitable AI in Higher Education, composed of representatives from historically excluded institutions and, by extension, students. We urge policymakers, technologists, and funders to proactively consult the Council and disrupt systemic inequities by integrating AI into higher education rather than continue to perpetuate them.

CCA's creation of the Council is a bold and pioneering step towards ensuring that AI not only advances academic attainment but does so with unwavering commitment to equity. This is not just another committee; it is a testament to our proactive approach in bridging technological advancement with equity at the forefront. We're not waiting for the future; we're building it, ensuring that AI serves as a tool for leveling the playing field, not widening existing gaps. This Council will not only set the standards but also ensure they are met with the rigor and foresight that this pivotal moment demands.



INTRODUCTION

As our sector navigates the early stages of generative AI integration, we stand at a critical juncture. While the gap in AI adoption among various institutions is not yet pronounced, past technology adoption indicates that we may be approaching the precipice of a divide. If left unchecked, well-funded, selective institutions could accelerate ahead, leaving community colleges, minority-serving institutions (MSIs), regional colleges and universities, and others that serve historically under-represented students at a disadvantage.

Now is the time for higher education to disrupt dysfunctional systems and pave the way for all students to complete college. By insisting on equity, institutions ensure that every student—particularly those who have been historically excluded—has the career opportunities and life benefits available to those with degrees and other credentials of value. We must assess our practices to find ways to improve, identify inequities, address them, and bring every member of the educational community into this essential work.

Championing these ambitious goals, Complete College America (CCA) serves as a national fulcrum for accelerating college completion rates and closing institutional performance gaps. Rooted in data-driven advocacy, CCA collaborates with states, systems, academic institutions, and various partners. CCA advocates for the reallocation and expansion of resources to the institutions that serve most American college students, enabling them to initiate required structural and practice reforms. These reforms aim to bridge equity gaps and elevate overall institutional performance, especially around completion rates and other pivotal college goals.

AI is the newest, most profound disruption in our industry: one that many have classified as a problem for higher education, equity, and broader society. We view AI as an opportunity, rather than a challenge, to boost attainment. We must collectively steer the AI ship toward a positive disparate impact on educational success and completion.

Let us use AI to equalize opportunities that have historically been out of reach for many Americans, particularly college degrees and credentials, and dramatically scale access to higher education's myriad individual, economic, and societal benefits.

Recent news around funding for AI initiatives paints an alarming picture: select institutions with access to resources can invest in innovation around AI, including creating centers to study it, while many other institutions cannot.¹

On the flip side, the 2,981 access-oriented colleges and universities in America are not mere players in the education field; they are the backbone. These access-oriented institutions serve over 90% of all college students, 92% of all BILPOC students, and 93% of all Pell-awarded students. We must act with intention and foresight to prevent an adoption gap, recognizing the potential consequences of inaction and the potential continuance of disinvestment in these institutions.

At the heart of this urgent call to action is the creation of the **Complete College America Council on Equitable AI in Higher Education**, which seeks to employ AI as a tool to craft solutions that bridge the gap in opportunities, championing the cause of all institutions and the students they serve, especially those who have been sidelined in the past. Elevating historically unheard voices in policy and technology development requires facilitating an inclusive dialogue grounded in the principles of justice and equity. Their voices are vital, their perspectives are unique, and their inclusion is non-negotiable.

The institutions that serve the most students receive the least financial support,² and they are often excluded from major regulatory or systemic decision-making processes and only consulted when downstream challenges arise. We must learn from past missteps and consider the ripple effects of policy decisions on those not given a seat at the table.

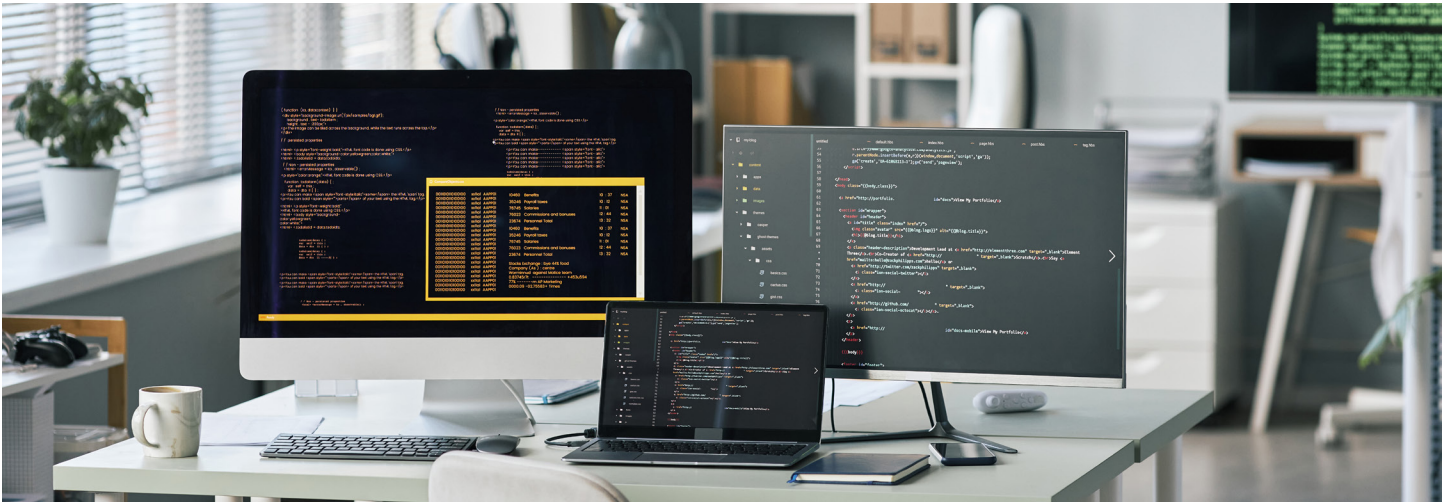
In 2020, Sara Goldrick-Rab highlighted a poignant example of American policymakers' most recent blunder when devising formulas to fund community colleges before and during the COVID-19 Pandemic: while community colleges educate about 40% of students nationwide and more than half of all low-income students, they were only allocated 27% of CARES Act Funds during the COVID-19 pandemic.

Policymakers and education technology leaders alike must be mindful of the potential consequences of maintaining the status quo, and the Council can play a vital role in avoiding similar mistakes as we navigate the turbulent waters of the AI revolution.

In this position paper, we will lay out the imperative for equitable AI, highlighting the essential role of access-oriented institutions, calling tech companies, higher education funders, and local, state, and federal agencies to consult with our newly convened Complete College America Council on Equitable AI. Equitable AI spans far beyond the risk of mis-trained data. How schools adopt or reject these tools, the priorities of AI vendors, and the systemic integration of historically unheard voices will shape whether technology amplifies privilege or fosters inclusivity.

¹ Coffey, L. (2023, September 5). Risks and rewards as higher ed invests in AI. Inside Higher Ed. Retrieved from: <https://www.insidehighered.com/news/tech-innovation/artificial-intelligence/2023/09/05/risks-and-rewards-higher-ed-should-know>

² Goldrick-Rab, S. (2020, May 22). America sabotaged the solution to its new higher-education crisis. The Atlantic. Retrieved from <https://www.theatlantic.com/ideas/archive/2020/05/community-colleges-could-help-students-through-pandemic/611884/>.



COMPLETE COLLEGE AMERICA COUNCIL ON EQUITABLE AI IN HIGHER EDUCATION: LEVERAGING AI FOR A JUST EDUCATIONAL LANDSCAPE

The Council brings together organizations representing the lion's share of colleges and universities in America: 2,900 access-focused two-year and four-year colleges and universities. This diverse group represents the interests of 90% of America's students, positioning the Council as a significant force in steering the narrative toward inclusivity and equity in AI. The Council recognizes the transformative potential of AI to overturn entrenched inequities and foster positive disparate impacts. It aims to guide the adoption of AI in higher education with an eye toward justice and equity, focusing on the needs of those traditionally unserved and underserved in the educational landscape.

Spearheaded by Complete College America (CCA), this initiative arises at a critical juncture where financial and political resources are disproportionately allocated to a select group of 200 colleges and universities, which cater to less than 10% of students in America. Unlike the institutions represented by the Council, these select institutions currently enjoy an unfair advantage, receiving the most resources for experimentation, development, and study in the burgeoning field of AI. This imbalance risks perpetuating existing inequities and fostering a landscape where only a privileged minority can access AI's emerging opportunities.

The Complete College America Council on Equitable AI in Higher Education represents a new paradigm in higher education, recognizing the pivotal role of access-oriented institutions in shaping the future. This is not a mere assembly; it is a deliberate response to the urgency of equitable AI adoption, an answer to the historical inequity that still echoes in the halls of academia.

The Council's mission is to elevate voices that have been historically unheard in policy and technology development. By convening thought leaders from diverse backgrounds, it aims to foster an inclusive dialogue, ensuring that AI-related funding, regulation, and development decisions are not made in consultation with a select few but rather take into consideration the needs, priorities, and perspectives of all higher education institutions and the students they serve.

An essential part of the Council's role will be engaging with policymakers at various levels to inform regulations and policies concerning AI in higher education. By acting as a bridge between policy and practice, the Complete College America Council on Equitable AI in Higher Education will ensure that regulations reflect the real-world challenges and opportunities of AI adoption.

Additionally, the Complete College America Council on Equitable AI in Higher Education will actively engage with both public and private funders to inform decisions about resource allocation, aligning state, federal, and private foundation support with the strategic needs of access-oriented institutions.

Rather than continue to reify social, economic, and racially entrenched inequities, which will surely be the outcome should decision-making processes continue unchecked, the Complete College America Council on Equitable AI in Higher Education must be given a seat at the decision-making table.

As tech giants like Google execute plans to turn their entire search engine into generative AI chat,³ we urge this Complete College America Council on Equitable AI in Higher Education to consider the consequences of maintaining the status quo. This is a disruptive moment in our nation's history, a chance to rethink and reframe how we prioritize and value educational institutions.

Its primary role will be to consult with tech giants and emerging firms alike, from Google and Amazon to smaller educational technology innovators. The Council's work will bridge the gap between technology leaders and institutions that may otherwise be left behind, forging partnerships that can shape the AI landscape in a way that serves everyone.

This united effort is a vital step toward disrupting the dysfunctional systems of the past, paving the way for all students to complete college, regardless of their background or the institution they attend. The Complete College America Council on Equitable AI in Higher Education sets the stage for a more equitable future, guided by a shared commitment to inclusivity, opportunity, and justice.

³ Kruppa, M. (2023, May 6). Google plans to make search more 'personal' with AI chat and video clips. Wall Street Journal. Retrieved from <https://www.wsj.com/articles/google-search-ai-artificial-intelligence-chatbot-tiktok-67c08870>.

EQUITABLE AI

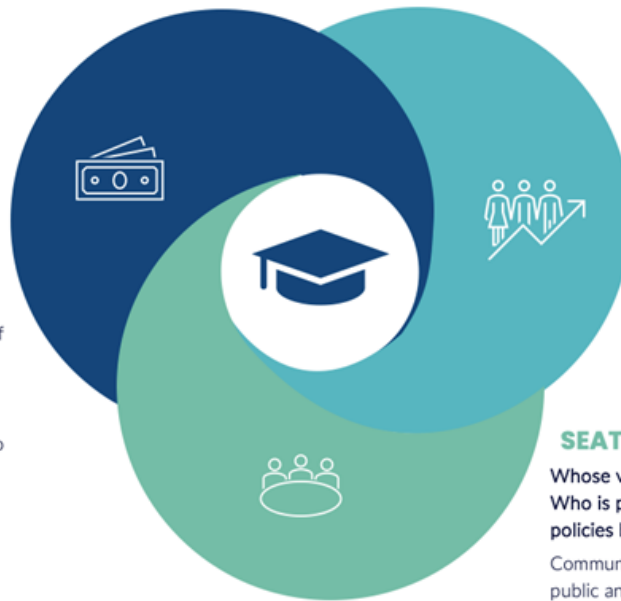
How do we prevent AI from perpetuating current inequities?

ACCESS TO AI

1) Institutions: Which institutions will be able to scale access to learning via AI-enabled practices and interventions?

2) Students: Who will be able to learn with and about AI? Who will be able to learn within an AI-enabled environment?

What's At Stake: Given the high cost of innovating with current AI platforms, students served by less resourced institutions may have less access to the myriad opportunities that AI presents to scale resources and learning.



UNBIASED TRAINING DATA

What is the AI System learning from?

AI must be trained on high quality, representative data and rigorously tested to prevent biased outputs.

What's At Stake: Bias is unknowingly perpetuated among AI users.

SEAT AT THE TABLE

Whose voices are heard during design decisions? Who is pressure testing the product? How are policies being developed?

Community colleges, Minority Serving Institutions, public and other access-oriented institutions of higher education must be included in early stages of AI development.

What's At Stake: We risk having to mitigate the harm of excluding schools that represent most American learners from the product development and policy decision process.

BEYOND DATA BIAS: A SYSTEMATIC APPROACH TO AI ADOPTION

Equitable AI transcends the limited scope of data bias, addressing the comprehensive systemwide adoption of AI tools. The challenge extends beyond simply refining algorithms or data sets. Instead, it demands a commitment to equity that permeates the entire process, from design to implementation, accessibility, and oversight. We see future and current inequity issues falling into three spheres:

1. Preventing Biased AI.
2. Ensuring that access-oriented colleges and universities have a proportional number of seats at the AI investing, developing, inventing, and regulating tables.
3. Ensuring that access-oriented institutions are proportionally and adequately funded based on the volume of students they serve.

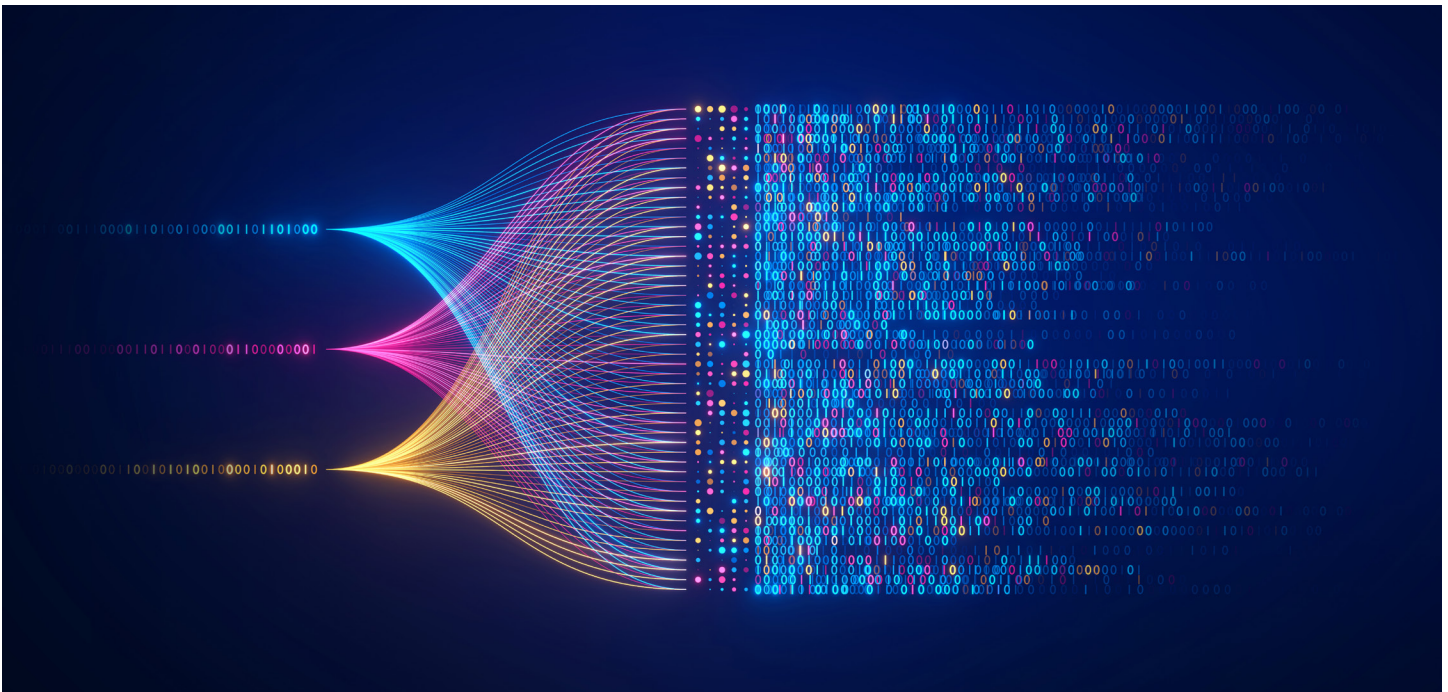
The Complete College America Council on Equitable AI in Higher Education will serve as a critical accountability lever, helping to guide the development of new AI. This involves working closely with accreditation agencies, state and federal authorities, and other stakeholders to ensure that vendors adhere to equitable practices. The Council's role is to articulate the values that should guide AI in education, advocate for these values, and facilitate collaboration to make them a reality.

The Council's role includes influencing the pricing structures of ed-tech products to ensure that they accommodate the unique needs of access-oriented institutions. The Council will also encourage vendors to be transparent about the data on which they train their models, fostering an environment where equity is not just a goal but a tangible practice.

The Council will collaborate with existing regulatory bodies and encourage them to integrate these human-centric values into their accreditation processes and regulatory frameworks. This will help create an equitable approach to AI in education that reflects a shared commitment to diversity, access, and opportunity.

The Council's approach will also encompass efforts to guide schools in navigating the complexities of AI adoption without perpetuating existing inequities. By engaging with educational institutions and providing insights and recommendations, they will help shape an educational system that leverages AI to enhance learning for all students. CCA is particularly focused on AI because it presents a profound opportunity to scale the practices we already work with institutions to develop, implement, and expand. AI is a tool in the completion toolkit that will accelerate our progress toward our mission.

At the heart of this initiative is recognizing that the equitable implementation of AI requires an ongoing, collaborative effort. It's not enough to react to emerging challenges; we must proactively engage with the potential risks and opportunities that AI presents. The Complete College America Council on Equitable AI in Higher Education stands as a beacon, guiding this effort with a vision that places integrity and purpose at the forefront of technological advancement.



ENSURING TECHNOLOGY SERVES ALL: A CALL TO ACTION FOR AI VENDORS

AI in the age of information technology holds the potential to break barriers and redefine educational paradigms. Yet, it is all our responsibility in this transformative era to go beyond creating state-of-the-art tools and use cases for AI. It is about designing, funding, and scaling technology that serves not only the privileged but also under-represented institutions. It's a moral imperative to approach technology development with an asset-based mindset rather than a deficit-based one.

Rather than overemphasizing students' weaknesses, vendors must work together with educators to develop tools that focus on students' strengths. This perspective facilitates the creation of solutions that enhance areas where the student can improve. Members of the CCA AI Working Group have generated over 230 practices that center equity, the student experience, and the voices of these institutions with purpose already.⁴

This group has identified many practices that turn traditional deficit ways of thinking upside down. Consider, for example, the concept of equitable grading with AI: AI-driven grading assistance can retrain faculty to provide equitable feedback and remove bias toward formal language. By offering guidelines that focus on content and critical thinking, AI ensures that grading emphasizes the substance of student work, promoting fair evaluation regardless of writing style or background.⁵

⁴ The CCA AI Working group was a temporarily formed group, convened across the summer of 2023 to ideate around generative AI, its implications for college completion, and to surface recommended next steps for CCA. The work of this group served as the primary inspiration for this playbook

⁵ Again, we believe that AI should aid faculty in their grading work, but it is not a replacement for the faculty task of grading.

Another revolutionary idea is revisionist historic immersion through AI. Through AI-assisted AR/VR/XR, learners can experience historical and sociological events firsthand. Such immersive learning fosters empathy and alternative perspectives beyond traditional narratives. For example, re-telling the story of the Lewis and Clark Expedition through the perspective of Sacagawea enriches understanding and humanizes history.

These examples are not merely theoretical; they are actionable ideas that redefine how we utilize technology for education. The Complete College America Council on Equitable AI in Higher Education will serve as a bridge between vendors and the broader educational community. By engaging with the Complete College America Council on Equitable AI in Higher Education, vendors can align their products with the values and needs of institutions that have historically been sidelined.

Through collaboration, open dialogue, and the shared commitment to an equitable future, we can transcend barriers and build an educational system where technology amplifies inclusivity rather than reinforces exclusion. The call to action is clear: let us design with empathy, innovate with purpose, and strive to ensure that the tools we create serve all with dignity and respect.



PREPARING OUR FUTURE STUDENTS FOR THE WORKFORCE: THE IMPERATIVE OF EQUITABLE ACCESS TO AI LITERACY

In the rapidly evolving landscape of technology, the workforce's demand for AI literacy is burgeoning. A recent IBM study reveals that within less than a year of generative AI becoming publicly available, executives estimate that at least 40% of their workforce will need to reskill. The urgency of this transformation is not confined to select circles of innovation or privileged institutions; it permeates the entire fabric of education and employment.

The institutions we represent serve most college students in our nation. These institutions, including community colleges, Minority-Serving Institutions (MSIs), and regional public colleges, are not mere participants in the education arena but the very linchpins that uphold access, equity, and opportunity.

As we navigate this pivotal moment in our nation's history, it is paramount that the incorporation of AI training and literacy happens at all levels of the education industry. This is not a privilege reserved for the Ivy League or the most innovative schools; it is a necessity for all. The goal is to provide scalable access to education to many more who have historically been excluded due to prohibitive costs or other competing life factors.

The Complete College America Council on Equitable AI in Higher Education and the institutions they represent, in their unwavering commitment to equity and inclusion, are ideally poised to spearhead this transformation. By ensuring that AI education is universally accessible and tailored to emphasize students' strengths rather than weaknesses, we can redefine the educational landscape.

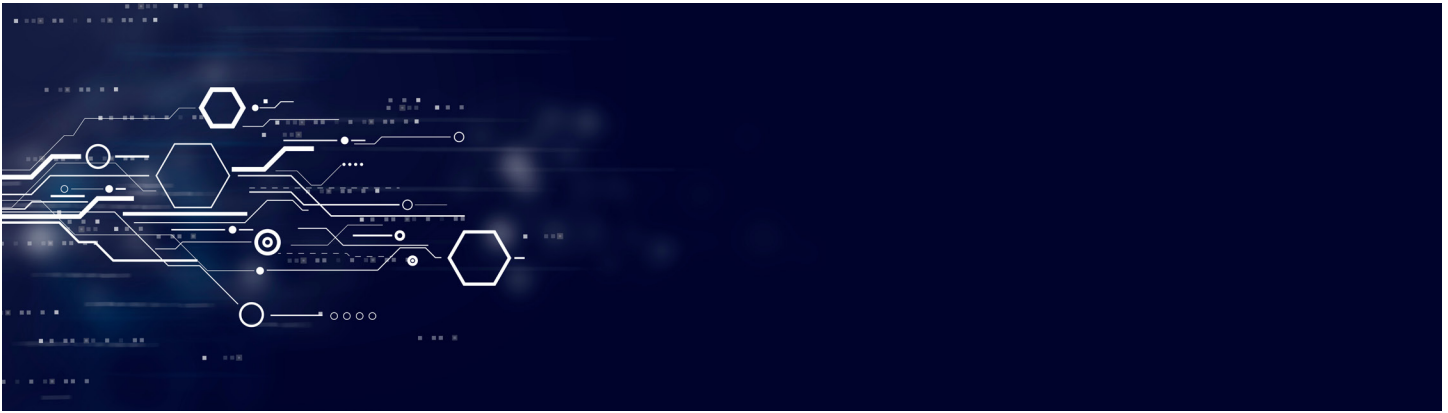
Our resolve is clear, and our mission is urgent. How we approach AI literacy and its incorporation into our education system will shape the future of education and the very fabric of our society. The stakes are high, and the time for action is now.

⁶ See below for the proposed Charter of the Complete College America Council on Equitable AI in Higher Education.

⁷ Goldstein, J. (2023, August 14). New IBM study reveals how AI is changing work and what HR leaders should do about it. IBM Blog. Retrieved from: <https://www.ibm.com/blog/new-ibm-study-reveals-how-ai-is-changing-work-and-what-hr-leaders-should-do-about-it/>

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PROPOSAL FOR THE COMPLETE COLLEGE AMERICA COUNCIL ON EQUITABLE AI IN HIGHER EDUCATION: LEVERAGING AI FOR A JUST EDUCATIONAL LANDSCAPE

Proposed Charter

The Council brings together organizations representing the lion's share of colleges and universities among America's 2,900 two-year and four-year colleges and universities. This diverse group represents the interests of 90% of America's students and thus serves as a significant force in steering the narrative toward inclusivity and equity in artificial intelligence (AI). The Council recognizes the transformative potential of AI to overturn entrenched inequities and foster positive disparate impacts. It aims to guide the adoption of AI in higher education with an eye toward justice and equity, focusing on the needs of those traditionally unserved and underserved in the educational landscape.

Spearheaded by Complete College America (CCA), this initiative arises at a critical juncture where financial and political resources are disproportionately allocated to a select group of 200 colleges and universities, which cater to less than 10% of students in America. Unlike the institutions represented by the Council, these select institutions currently enjoy an unfair advantage, receiving a disproportionately outsized share of resources for experimentation, development, and study in the burgeoning field of AI. This imbalance risks perpetuating existing inequities and fostering a landscape where a privileged minority has access to the emerging opportunities AI has to offer.

Mission

The Council seeks to employ AI to craft solutions that bridge the gap in educational opportunities, championing the cause of all institutions and the students they serve, especially those who have been sidelined in the past. To elevate historically unheard voices in policy and technology development, the Council will facilitate an inclusive dialogue grounded in the principles of justice and equity.

Vision

To envision a future where AI acts as a beacon of opportunity and inclusivity in higher education, the Council aspires to create environments where technology serves everyone with dignity and respect, effectively leveling the playing field for underrepresented institutions through positive, disparate impacts.

Operational Framework

The Council will actively engage with both public and private funders, policymakers, and technology firms, employing mechanisms such as:

- Roundtables to foster dialogue and gather diverse insights
- Invitations to stakeholders to participate in alpha or beta testing of AI technologies
- Facilitating pilot opportunities through schools represented by the Council
- Collaborative efforts in product development, focusing on user testing and stakeholder input
- Directing efforts toward issues that need priority funding
- Guiding principles and ethics

Core Objectives

1. Policy Engagement and Regulation: To work with policymakers at various levels to inform and influence policies that foster benefits for the schools that serve the majority of students through AI, championing equity and transparency in AI adoption.
2. Resource Allocation: To align state, federal, and private foundation support with the strategic needs of institutions, ensuring resources are judiciously directed to foster equal opportunities.
3. Partnerships with Technology Firms: To collaborate with tech giants and emerging firms, fostering partnerships that shape the AI landscape to be inclusive and actively beneficial for traditionally unserved institutions.
4. A Systematic Approach to AI Adoption: To champion the adoption of AI technologies grounded in equity, working toward a landscape where AI tools are designed and implemented to foster positive disparate impacts and reduce existing inequalities.

Success Metrics

The Council will consider its initiatives successful when:

1. All college students have access to safely learn about, from, and with generative AI so they are prepared for the workforce of the future.
2. Vendor and technology decisions are made in partnership with colleges and universities that educate the 90% of college students represented by access-oriented institutions.
3. Sliding-scale fee structures are common practice in the higher education vendor technology space.
4. Colleges and universities have access to multiple sources of funding to innovate and research AI and its efficacy, regardless of their selectivity, the size of their endowment, or their reputation.
5. Consortia exist to support institutions with fewer resources in navigating the complex decisions presented in the implementation and management of AI on campus.

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