



August 28, 2026

The Honorable William P. Soules
Chair, Legislative Education Study Committee
New Mexico State Capitol
490 Old Santa Fe Trail
Santa Fe, NM 87501

The Honorable Mariana Padilla
Secretary of Public Education
New Mexico Public Education Department
300 Don Gaspar Avenue
Santa Fe, NM 87501

Re: Use of Amira in New Mexico Public Schools

Dear Chairman Soules, Secretary Padilla, and Members of the Committee:

We are grateful for the opportunity to play a role in ensuring that more New Mexico children are on the path to reading proficiency. Our goal with this letter is to provide information to Secretary Padilla with respect to the letter on August 25. It is, of course, critical for parents to understand how and why technology is being used within public schools, and education technology should be held accountable for both educational outcomes and the safe and appropriate use of student data.

New Mexico teachers are among the thousands, worldwide, who use our technology to better understand the way every student reads in order to catch hesitations, substitution, and decoding errors that can be signals of a reading challenge. Beyond early detection of reading struggle, our technology helps teachers to deliver short-bursts of support, grounded in the Science of Reading. This all happens in less than 30 minutes per week, and never outside the supervision of a classroom teacher. The technology that we use was created at Carnegie Mellon University and has been vetted and approved by more than 30 state Departments of Education. Amira is the only reading intervention validated for meaningful growth by both the What Works Clearinghouse and Evidence for ESSA. Every aspect of our work is grounded in Science of Reading research. Today, Amira works with almost 5 million students worldwide.

Identifying reading challenges and employing the appropriate interventions has relied on the heroic efforts of individual teachers, pulling students aside, listening to them read (in a noisy classroom) while marking up a paper rubric. This intensive process has made it notoriously difficult to diagnose gaps and consumed the time for the personalized attention that every student deserves. As a result, parents are often left in the dark about potential challenges and far too many children slip through the cracks, with challenges diagnosed late or with many important subpopulations over-flagged.

More than a dozen independent studies have now demonstrated that when teachers have access to Amira, students grow significantly faster as readers, with the largest gains among disadvantaged student populations. This year, as PED and Amira presented at the LESC meeting, New Mexico students who read aloud for just 20 minutes a week using Amira gained 10 additional weeks of reading growth compared to their peers. In Albuquerque Public Schools, students working with Amira grew 28 percent more.

Although we appreciate the legislature's concerns the letter reflects a significant misunderstanding of what our Assessment is, does, and how it works. Below, we have included specific answers to your questions, along with facts that will - we hope - help to frame future conversations. Based on your review, we would welcome the meeting you proposed.

How does the assessment work?

- Amira is used under the supervision of a professional educator to listen to a student read aloud, flag where that student is struggling, and provide teachers targeted support to help a student back on track. It is not a chatbot or an LLM. It does not have the ability to converse with students, generate its own content, or make instructional decisions.
- The assessment has been vetted and approved by dozens of State Educational agencies.

Is model drift a valid concern?

- No. We understand that parents and other stakeholders may be hearing about, or are familiar with the phenomenon of “drift” from other contexts e.g., the use of consumer chatbots. In contrast, Amira Assess changes once and only once a year, with the annual school year release.
- Our assessment models are versioned and frozen. The model a student reads to in March is the identical, comprehensively tested model deployed in August. Amira Assess cannot and does not retrain itself on student data in real time and its scoring and behavior cannot change. There is zero “drift” across a school year.
- Every model version that we utilize is fully validated against human-scored benchmarks before release, including accuracy checks across subpopulations (accents, dialects, and English learners). When we improve a model, that represents a new Annual release, documented in our Technical Manual and accompanied by published norms and psychometrics that are a function of that annual model.
- We agree it is not enough to test once. We employ a comprehensive model monitoring protocol, and would welcome the opportunity to walk the Department and the Legislature through our validation process in detail, including results specific to New Mexico students.
- The updates that occur annually ensure that Amira is always responsive to changes in the student population in New Mexico and nationally. “Drift” happens when models do not change and the world they live in evolves.



- Note that the Amira Tutor is updated more frequently and makes use of evolving student performance. The two products use completely different sets of models.

Does Amira sell student data?

- No. Amira does not and will not ever sell student data, or use recordings of New Mexico students to build products for anyone else. Our access to data is strictly governed by FERPA, COPPA, and our SEA & district agreements. Amira is subject to a wide range of laws and we have not and will not conduct unlawful actions.
- Amira only collects the demographic data that the State of New Mexico requires all New Mexico assessments to collect. We would welcome PED's permission to stop collecting that data.

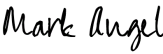
Our technology only collects what is needed to assess a child's reading and report it to their teacher. We have provided plain language answers to common questions on amiralearning.com/amira-trust-center.

Is Amira in contravention of federal policy?

- No. The OMB 24-10 Memo was rescinded on April 25, 2025 and has no administrative existence. The Memo was replaced by one encouraging AI adoption and its jurisdiction was and is designed for federal agencies alone. Amira is fully compliant with the recent ED Guidance for technology.

We know that New Mexico parents and policymakers care deeply about improving reading outcomes for all children in the state. Amira exists to ensure that struggling readers are identified early, in time to deliver the sort of evidence-based interventions that can improve literacy rates, and change lives. We welcome more conversation about the facts.

Sincerely,

DocuSigned by:

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 Mark Angel

Founder and Chief Executive Officer
 Amira Learning

cc: Amanda Debell, Deputy Secretary of Teaching and Learning and Innovation, Lynn Vasquez, Division Director Assessment, Research, Evaluation, & Accountability (AREA), New Mexico Public Education Department