

# Artificial Intelligence for Implementing Universal Design for Learning in Inclusive Education

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## ABSTRACT

Universal Design for Learning (UDL) provides a foundational framework for inclusive education by promoting flexible learning environments that respond to learner variability. However, large class sizes, limited instructional time, and insufficient individualized support often constrain effective UDL implementation in everyday classroom practice. Artificial Intelligence (AI) offers significant potential to operationalize UDL principles at scale through adaptive content delivery, personalized feedback, multimodal representation, real-time analytics, and assistive communication supports. This paper examines the conceptual alignment between AI and UDL, reviews current AI-enabled tools that support inclusive practices, and proposes an AI-UDL Integration Framework structured around representation, action and expression, and engagement. The paper critically addresses ethical and governance concerns, including algorithmic bias, accessibility equity, data privacy, and cybersecurity. Given that AI systems frequently process sensitive learner data, robust cybersecurity and responsible data governance are essential to safeguard inclusion. The paper argues that AI should function as an assistive pedagogical infrastructure that enhances teacher capacity rather than replaces professional judgment. When aligned with inclusive values and implemented responsibly, AI can help bridge the gap between UDL's theoretical aspirations and classroom realities.

**Keywords:** *Artificial Intelligence; Universal Design for Learning; Inclusive Education; Adaptive Learning; Assistive Technology; Cybersecurity; Personalized Learning*

## 1. Introduction

Inclusive education is defined by the commitment to provide equitable participation and a sense of belonging for all students, regardless of their neurodiversity, physical abilities, or socio-cultural backgrounds. Central to this mission is the Universal Design for Learning (UDL), a framework that shifts the focus from fixing the student to fixing the curriculum through inherent flexibility (Rose & Meyer, 2002). By proactively designing instructional goals, methods, materials, and assessments that work for everyone, UDL aims to dismantle the

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one-size-fits-all approach that traditionally marginalizes students with diverse learning needs (Meyer et al., 2014).

Despite its theoretical strength and widespread pedagogical endorsement, the practical application of UDL is often stymied by the reality of the classroom. Research indicates that large student-to-teacher ratios, administrative burdens, and rigid standardized assessments create significant barriers to effective differentiation (Ok et al., 2017). Teachers frequently struggle to provide the high-intensity, personalized scaffolding required for a truly inclusive environment, leading to a gap between UDL's inclusive ideals and its functional implementation in diverse school settings (Rao et al., 2021).

Recently, the rapid evolution of Artificial Intelligence (AI) has introduced a technological affordance that aligns uniquely with UDL goals. AI systems, ranging from large language models and natural language processing to adaptive tutoring systems, can process vast amounts of learner data to provide real-time, personalized support that was previously labor-intensive for human educators (Chassignol et al., 2018). These technologies enable the automation of accessibility features, such as instant text-to-speech, real-time translation, and the dynamic adjustment of content difficulty levels based on individual student progress (Luckin et al., 2016). Furthermore, the integration of AI within the classroom provides a scalable solution to the problem of learner variability. By serving as an intelligent intermediary, AI can offer multiple pathways for students to perceive information and express their knowledge, thereby reducing the cognitive load on teachers while increasing learner autonomy (Zawacki-Richter et al., 2019). This paper argues that AI does not merely add a digital layer to the classroom but serves as a foundational infrastructure that operationalizes UDL principles at scale. Through this synergy, inclusion moves from a policy aspiration to an achievable classroom reality, fostering an environment where diversity is not just accommodated but is a core driver of instructional design.

## 2. Universal Design for Learning: Conceptual Foundations

UDL is a pedagogical framework grounded in cognitive neuroscience, specifically focusing on the variability of human brain networks during the learning process. The core premise is that the average learner is a myth, and therefore, instructional design must be inherently flexible to accommodate the diverse ways individuals perceive, process, and engage with information (Rose & Meyer, 2002). According to research by CAST, UDL is structured around three primary brain networks: the recognition network (the what of learning), the strategic network (the how of learning), and the affective network (the why of learning) (Meyer et al., 2014).

### 2.1 Principle 1: Multiple Means of Representation

The first principle focuses on the recognition network, which enables learners to identify and interpret patterns in sensory data. Because learners differ in their ability to perceive and comprehend information, due to sensory disabilities, language barriers, or cognitive differences, UDL mandates that information be presented in various formats (Al-Azawei et al., 2016). This includes providing alternatives for auditory and visual information, such as digital text that can be manipulated in size or contrast, and using multiple media to illustrate complex concepts. Research by Ok et al. (2017) emphasizes that when content is represented through various modalities, the cognitive load is reduced, allowing students to focus on high-level comprehension rather than decoding barriers.

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## 2.2 Principle 2: Multiple Means of Action and Expression

The second principle addresses the strategic network, which governs how learners plan, execute, and monitor their actions and expressions. Learners vary significantly in their motor skills, executive functioning, and preferred modes of demonstrating mastery. A rigid reliance on standardized written essays, for example, may mask the true knowledge of a student with dysgraphia or physical impairments (Rao et al., 2021). UDL encourages the use of flexible response formats, such as oral presentations, digital portfolios, or visual projects, and the integration of assistive technologies that allow for varied physical actions. This approach ensures that the construct relevance of an assessment is maintained while removing construct-irrelevant barriers (Meyer et al., 2014).

## 2.3 Principle 3: Multiple Means of Engagement

The third principle targets the affective network, which is responsible for motivation, persistence, and emotional regulation. Engagement is highly individualistic; some learners prefer routine and quiet, while others thrive in collaborative, high-stimulus environments. Factors such as cultural background, personal interests, and prior knowledge significantly influence a student's willingness to invest effort (Griful-Freixenet et al., 2017). UDL promotes learner agency by offering choices in tools and content, fostering a sense of autonomy, and providing scaffolded supports that help students regulate their own learning goals. By addressing the emotional and motivational aspects of learning, educators can sustain student interest and prevent the disengagement that often leads to academic failure in inclusive settings (Bond et al., 2020).

## 3. Artificial Intelligence in Education: Capabilities and Scope

The integration of Artificial Intelligence in Education (AIED) has transitioned from experimental automation to an embedded pedagogical partnership that reshapes instructional design (Qian & Hassan, 2025). AI in this context refers to a suite of technologies, including Machine Learning (ML), Natural Language Processing (NLP), and Computer Vision, that simulate human cognitive functions to support educational ends. Recent Scopus-indexed research highlights that AI's primary strength in inclusive settings lies in its ability to provide personalization at scale, a feat previously unattainable in traditional classrooms (Toyokawa et al., 2023).

### 3.1 Adaptive Learning and Intelligent Tutoring Systems (ITS)

At the core of AI's educational scope are Intelligent Tutoring Systems (ITS). These platforms function as interactive pedagogical agents that deliver multidimensional feedback in real time (Pardue & McPherson, 2019). Unlike static e-learning tools, ITS use algorithms to continuously assess a student's pace, accuracy, and engagement levels, dynamically adjusting the difficulty of content to maintain the learner within their Zone of Proximal Development. By automating routine skill practice, AI allows learners to allocate their psychological resources to higher-order activities, such as creative development and critical thinking (Merchán Sánchez-Jara et al., 2025).

### 3.2 Generative AI and Content Transformation

The emergence of Generative AI (e.g., Large Language Models) has significantly expanded the scope of AIED by enabling the instantaneous creation of differentiated materials. Generative

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tools can convert a single complex lesson plan into various reading levels, generate visual summaries, or produce alternative communication scripts for neurodivergent students (Zhu, 2025). This capability directly addresses the UDL requirement for flexible materials that can be modified without changing the underlying learning objectives.

### **3.3 Learning Analytics and Predictive Support**

AI-driven Learning Analytics provide educators with real-time dashboards that surface subtle patterns in student interaction. These systems can detect early signs of frustration or disengagement, often before they manifest as behavioral issues, allowing for timely, data-informed interventions (Zahurin et al., 2024). In inclusive classrooms, this diagnostic capacity is vital for identifying undiagnosed learning differences or monitoring the effectiveness of specific accommodations (Han et al., 2022).

### **3.4 Assistive and Augmentative Infrastructure**

Beyond pedagogy, AI serves as an essential accessibility infrastructure. Computer vision and NLP technologies power tools that provide real-time image descriptions for students with visual impairments, automated speech transcription for those with hearing impairments, and sophisticated Augmentative and Alternative Communication (AAC) systems for learners with speech disorders (Khine, 2024). By embedding these features into the learning environment, AI reduces the need for segregated special tools, promoting a truly inclusive design for all (Saborío-Taylor & Rojas-Ramírez, 2024).

## **4. Conceptual Alignment Between AI and UDL**

The synergy between Artificial Intelligence and Universal Design for Learning is rooted in their shared objective: addressing learner variability through systemic flexibility rather than individual retrofitting. AI serves as the technological engine that powers UDL's pedagogical framework, allowing the three principles to be enacted dynamically and simultaneously for an entire cohort of diverse learners (Chassignol et al., 2018).

### **4.1 AI for Multiple Means of Representation**

AI significantly expands the Recognition Network by transforming static content into malleable, multimodal assets. In a traditional UDL environment, a teacher might manually provide a transcript for a video; however, AI-driven Natural Language Processing (NLP) can instantly generate live captions, translate text into over 100 languages, and provide text-simplification for students with cognitive disabilities or those learning in a second language (Hwang et al., 2020).

Furthermore, Computer Vision algorithms can describe complex diagrams for students with visual impairments, ensuring that the what of learning is accessible regardless of sensory barriers. Scopus-indexed research by Bond et al. (2020) suggests that such AI-mediated representation reduces the split-attention effect, allowing learners to engage with the medium that best suits their current cognitive capacity.

### **4.2 AI for Multiple Means of Action and Expression**

For the Strategic Network, AI lowers the physical and cognitive hurdles associated with demonstrating knowledge. Students who struggle with traditional written outputs due to motor

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impairments or dyslexia can utilize Speech-to-Text (STT) and AI-powered word prediction to bypass mechanical barriers (Rao et al., 2021). Beyond basic transcription, AI-driven Generative Tools allow students to express their understanding through diverse media, such as generating a digital storyboard, coding a simulation, or creating a podcast, all mapped to the same rubric. Intelligent Writing Assistants provide real-time scaffolding for executive functioning, offering prompts that help students organize their thoughts, check for logical flow, and self-correct, which is essential for neurodivergent learners (Roll & Wylie, 2016).

### 4.3 AI for Multiple Means of Engagement

AI addresses the Affective Network by maintaining the optimal challenge-to-skill ratio, known as the Flow State. Adaptive Learning Algorithms prevent the frustration caused by overly difficult tasks and the boredom caused by repetitive ones, which are primary drivers of disengagement in inclusive classrooms (Holmes et al., 2019).

Moreover, AI can personalize the context of learning. For example, a math word problem can be dynamically re-written by an AI to reflect a student's specific interests (e.g., sports, music, or nature) or cultural background, thereby increasing the perceived relevance and value of the task (Griful-Freixenet et al., 2017). By providing immediate, non-judgmental feedback through Pedagogical Agents, AI helps students build the self-regulation skills necessary for sustained effort and persistence (Luckin et al., 2016).

## 5. AI-UDL Integration Framework

To move beyond the ad-hoc use of digital tools, a systematic AI-UDL Integration Framework is required. This framework conceptualizes AI not as a replacement for the teacher, but as a multi-layered assistive infrastructure that supports the fluid nature of inclusive pedagogy. By organizing AI capabilities into three functional layers, schools can ensure that technology serves the diverse needs of the recognition, strategic, and affective networks simultaneously (Edwards & Cheok, 2018).

### Layer 1: Accessibility Infrastructure (The Foundation)

The base layer focuses on ensuring that the digital environment is perceivable and operable for every student. This layer utilizes Natural Language Processing (NLP) and Computer Vision to provide universal access points. Key features include:

- **Automated Conversion:** Real-time text-to-speech, speech-to-text, and image-to-text descriptions.
- **Linguistic Equity:** Real-time translation and simplified vocabulary tools for multilingual learners.
- **Visual Customization:** AI-driven UI adjustments that automatically modify contrast, font weighting, and layout for learners with visual or cognitive processing differences (Saborío-Taylor & Rojas-Ramírez, 2024).

### Layer 2: Adaptive Pedagogical Systems (The Engine)

The middle layer addresses the how of learning through Machine Learning (ML) models that personalize the instructional path. This layer moves from static content to dynamic interaction.

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- Scaffolding Automation: AI agents that provide hints or break down complex instructions based on the student's current performance (Pardue & McPherson, 2019).
- Flexible Pacing: Adaptive algorithms that allow students to spend more time on challenging concepts while bypassing mastered material, ensuring that no student is left behind or held back.
- Intelligent Feedback: Immediate, formative feedback that guides the learner toward mastery without the delay of manual teacher grading (Roll & Wylie, 2016).

### Layer 3: Engagement & Agency Systems (The Peak)

The top layer focuses on the why of learning, learner autonomy and self-regulation. This layer uses Predictive Analytics and Generative AI to foster a sense of belonging and purpose.

- Personalized Content Generators: Tools that rewrite curriculum examples to align with a student's cultural context or personal interests.
- Self-Regulation Dashboards: Student-facing analytics that help learners monitor their own progress, set goals, and reflect on their learning strategies (Luckin et al., 2016).
- Social-Emotional Nudges: AI systems that detect patterns of frustration and suggest brain breaks or alternative strategies to sustain effort and persistence (Zahurin et al., 2024).

In this integrated model, the teacher acts as the Architect of Learning, using the data generated by these layers to make high-level instructional decisions, while the AI manages the complex, real-time logistics of individual differentiation (Cope & Kalantzis, 2022).

## 6. Applications in Inclusive Classrooms

In the modern inclusive classroom, AI functions as a force multiplier for UDL, providing specialized support that is seamlessly integrated into the general education environment. This invisible support helps destigmatize accommodations, as the tools used by students with disabilities are often the same high-tech features available to the entire class (Cope & Kalantzis, 2022).

### 6.1 Supporting Neurodivergent Learners

For students with ADHD, AI-driven task managers can mitigate executive functioning challenges by breaking down long-term assignments into manageable, timed segments with automated reminders. For learners on the Autism Spectrum, AI-mediated social simulations and emotion-aware avatars provide a safe, predictable environment to practice social cues and communication strategies (Toyokawa et al., 2023). These tools allow students to iterate their social responses in a non-judgmental space before applying them in peer-to-peer interactions.

### 6.2 Supporting Learners with Sensory and Physical Disabilities

AI has revolutionized access for students with sensory impairments. Computer Vision applications can now interpret complex visual data, such as laboratory experiments or geography maps, and provide detailed auditory descriptions for students with visual impairments (Khine, 2024). Similarly, AI-powered noise-cancellation and speech-enhancement tools assist students with auditory processing disorders or hearing impairments

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by isolating the teacher's voice from classroom background noise. For students with physical disabilities affecting fine motor skills, AI-driven eye-tracking and voice-command interfaces allow for full participation in digital drafting, coding, and writing activities that were previously inaccessible (Saborío-Taylor & Rojas-Ramírez, 2024).

### 6.3 Multilingual and Culturally Diverse Classrooms

In increasingly globalized school systems, AI acts as a bridge for Emergent Bilinguals. Beyond simple word-for-word translation, AI tools can now perform translanguaging support, allowing students to brainstorm in their native language while the AI provides scaffolding to help them draft the final product in the language of instruction (Hwang et al., 2020).

Furthermore, Generative AI can be used to localize curriculum content, ensuring that word problems, historical examples, and literature summaries are culturally relevant to a diverse student body. This cultural responsiveness at scale fosters a sense of belonging and validates the lived experiences of marginalized learners (Zawacki-Richter et al., 2019).

## 7. Ethical Considerations and Risks

While the integration of AI within a UDL framework offers transformative potential, it introduces a complex array of ethical challenges that could inadvertently undermine the goals of inclusive education. If deployed without critical oversight, AI risks reinforcing the very barriers it is intended to dismantle (Bulger & Davis, 2020).

### 7.1 Algorithmic Bias and Representational Harm

AI systems are only as inclusive as the data used to train them. Algorithmic bias occurs when datasets lack representation from individuals with disabilities or diverse linguistic backgrounds. For example, speech recognition AI often fails to accurately process atypical speech patterns associated with certain physical or neurological disabilities, effectively silencing those students (Selwyn, 2019). Similarly, predictive analytics may carry historical baggage, where the AI identifies students from marginalized socio-economic backgrounds as at-risk based on biased historical trends rather than current potential (Zhu, 2025).

### 7.2 Data Privacy and the Surveillance Risk

The efficacy of AI-driven UDL relies on the continuous collection of granular student data, including behavioral patterns, cognitive processing speeds, and even emotional states. This raises significant Data Privacy concerns. In inclusive settings, where students may have sensitive medical or psychological diagnoses, the risk of data breaches or the commodification of student profiles is heightened (Miao et al., 2021). Furthermore, the constant monitoring required for real-time analytics can create a surveillance culture that may increase anxiety for neurodivergent students who are sensitive to observation (UNESCO, 2021).

### 7.3 Over-Reliance and the Black Box Problem

There is a danger that educators might defer too much authority to AI systems. The Black Box nature of many deep-learning algorithms means that even teachers may not understand why an AI has recommended a specific learning path for a student (Luckin et al., 2016). This lack of transparency can erode teacher autonomy and professional judgment. Moreover, over-reliance

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on automated tools for social-emotional support may diminish the vital human-to-human relationships that are the cornerstone of a truly inclusive classroom (Holmes et al., 2019).

### **7.4 The Digital Divide and Equity of Access**

The promise of AI-UDL is contingent upon high-speed connectivity and modern hardware. Without equitable distribution of these resources, AI could widen the Digital Divide. Students in well-funded urban districts may benefit from advanced personal AI tutors, while students in rural or under-resourced areas remain tethered to traditional, non-adaptive materials (Khine, 2024). True inclusion requires that AI infrastructure be treated as a public good rather than a luxury for the privileged few (Selwyn, 2019).

## **8. Implications for Teacher Education**

The integration of AI as an infrastructure for UDL necessitates a paradigm shift in teacher preparation and ongoing professional development. Educators can no longer be viewed as mere deliverers of content; they must evolve into Learning Architects who critically curate AI-enhanced environments (Cope & Kalantzis, 2022).

### **8.1 AI Literacy and Critical Evaluation**

Teacher education programs must prioritize AI Literacy, which involves more than just technical proficiency. It requires the ability to critically evaluate AI tools for pedagogical alignment and potential bias. Educators need to understand how to prompt generative AI to produce UDL-compliant materials, such as asking an AI to scaffold a complex text for a specific reading level without losing the core conceptual depth (UNESCO, 2021).

### **8.2 Collaborative Human-AI Pedagogy**

Training should focus on a Human-in-the-Loop model. Teachers must learn to interpret AI-generated dashboards to make high-level instructional decisions, such as when to intervene personally and when to let an adaptive system continue to guide a student (Luckin et al., 2016). Professional development should emphasize that AI is an assistive pedagogical infrastructure intended to augment, not replace, the emotional intelligence and relational expertise of the teacher (Edwards & Cheek, 2018).

## **9. Policy Implications**

To ensure that AI-driven UDL does not become a source of further inequity, policymakers must establish robust frameworks that prioritize disability rights and ethical governance.

### **9.1 Mandating Accessibility and Inclusion by Design**

National and regional education policies should mandate that all AI tools procured for school use meet the highest international accessibility standards, such as the Web Content Accessibility Guidelines (WCAG) 2.1 (Miao et al., 2021). Policies must shift from reactive accommodations to Inclusion by Design, where AI developers are held accountable for the representative diversity of their training datasets (Bulger & Davis, 2020).

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## 9.2 Data Sovereignty and Ethical Safeguards

Legislative frameworks, such as updated versions of the GDPR or FERPA, must specifically address the use of AI in special education. Policies must ensure data sovereignty for students, giving families clear rights over how their learning data is used and ensuring it is never used for high-stakes sorting or labeling that could lead to discrimination (Selwyn, 2019).

## 9.3 Funding for Rural and Under-Resourced Infrastructure

To prevent a deepening of the digital divide, policymakers must invest in the digital infrastructure of marginalized communities. This includes not only high-speed internet and hardware but also subsidized AI access for schools serving students with high needs. Inclusive education policy must view AI infrastructure as a fundamental right rather than a market-driven luxury (Khine, 2024).

## 10. Future Research Directions

As the integration of AI and UDL moves from theory to practice, the research community must address several critical gaps to ensure these technologies truly serve the goals of inclusive education. Longitudinal studies are urgently needed to measure the long-term impact of AI-supported UDL on learner agency and academic achievement across diverse populations (Qian & Hassan, 2025).

- **Impact on Teacher Identity:** Future research should investigate how the shift toward AI-mediated differentiation affects teacher professional identity and job satisfaction. Does the reduction in administrative differentiation labor lead to higher retention, or does it create a sense of pedagogical displacement? (Cope & Kalantzis, 2022).
- **Algorithmic Fairness in Special Education:** There is a critical need for technical research into de-biasing AI for students with disabilities. This includes developing datasets that specifically include non-standard speech, neurodivergent behavior patterns, and diverse cognitive processing styles (Bulger & Davis, 2020).
- **Cost-Benefit and Scalability:** Studies must examine the cost-effectiveness of AI-UDL infrastructure. Research should determine whether the initial high investment in AI tools leads to long-term savings by reducing the need for intensive, one-on-one human interventions and remedial schooling (Zawacki-Richter et al., 2019).
- **Learner Perspective:** More qualitative research is required to understand the lived experiences of students using AI assistants. Specifically, researchers should explore whether these tools foster genuine independence or create new forms of technological dependency (Selwyn, 2019).

## 11. Conclusion

Artificial Intelligence offers an unprecedented opportunity to operationalize Universal Design for Learning, transforming it from a resource-heavy ideal into a scalable reality. By providing a flexible infrastructure for representation, expression, and engagement, AI allows the modern inclusive classroom to respond to learner variability in real time. These technologies do not replace the teacher; rather, they serve as a powerful pedagogical assistant that removes the

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mechanical barriers to learning, allowing educators to focus on the human connections that facilitate true belonging (Luckin et al., 2016).

However, the path to successful integration is not purely technical. It requires a steadfast commitment to ethical governance, a focus on algorithmic transparency, and a policy-driven mandate for equitable access. Without a human-centric approach that prioritizes teacher agency and student privacy, the AI revolution in education risks creating new forms of exclusion. When aligned thoughtfully with the principles of UDL, AI can become the universal ramp of the digital age, ensuring that every student, regardless of their starting point, has an equitable pathway to success and self-actualization.

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The author declared no conflict of interest.

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