



**Submission to the Standing Committee on Human Resources, Skills and Social Development  
and the Status of Persons with Disabilities:  
The Implications of Artificial Intelligence on the Labour Force**

Chegg Inc.  
November 22, 2023

## Overview

Chegg is the leading global ed-tech company that provides a range of digital tools to help learners of all ages access digital education services. Chegg supports over 7.8 million learners from 150 countries worldwide, including more than 200,000 in Canada. Our experience as a global education service provider provides us with valuable insights into the different ways academic institutions, governments, businesses and regulators are grappling with the complex policy challenges resulting from rapid advances in online tools and artificial intelligence (AI).

Our mission is to improve learning and learning outcomes by putting students first. We support lifelong learners whether beginning with an academic journey and extending into their careers or those looking to upskill or learn new skills on the job or to move into a new career. The Chegg platform provides products and services to help learners better understand their academic course materials and provides personal and professional development skills training to help them achieve their learning goals.

Chegg is extensively involved in the use of AI in networking, data storage, and communications solutions to a broad set of customers spanning over one hundred countries. Chegg has a significant interest in developing and promoting governance and policies that foster the continued development and growth of AI. The development of a cohesive Canadian framework for AI at the federal level, such as Bill C-27, is an important development and Chegg believes that all AI framework development across government and regulators should be done in a coordinated effort.

Chegg is supportive of the Government of Canada's ambitions in training and educating more workers to fill meaningful careers, especially in health care and the skilled trades. We have supported similar objectives with government and private sector partners, such as Walmart, Vanguard, and Target, to develop upskilling and language courses for current and prospective employees to address labour shortages across a variety of sectors. Not only does this help companies to better attract and retain workers, but it also helps address many of the skills gaps employers are currently facing.

With generative AI revolutionizing the workplace and potentially creating 97 million new jobs by 2025, critical AI skills gaps will also emerge – so it is now more important than ever that companies are able to retain their employees and develop talent in-house. We are able to provide 24/7 on-demand support to course participants, helping them to learn more efficiently with personalised learning experiences. Designed by expert, in-house instructional designers, our 25+ programs help companies build internal talent pathways, attract skilled talent, and retrain employees. Chegg recognises that AI creates job opportunities and has experience preventing workplace layoffs by re-skilling and upskilling workers within a company to provide a different, but vital function within that company, preventing layoffs.

AI is rapidly increasing in prevalence across various sectors in Canada. Whether one is entering the workforce or in the middle of their career, they have likely encountered and used AI. Investing in high-quality skills programs can be a highly effective way for employers and employees to gain greater job satisfaction and more advanced skills – particularly as hiring skilled employees becomes even more difficult as AI shapes the landscape.

The prioritization of continued education and reskilling workers will be essential to provide enhanced supports for those seeking to upskill to enter a new career or enhance the capacity

they currently work in. Greater supports for these learners are imperative to ensure that people of diverse age groups, genders, income levels, and races are supported to achieve all learning and career objectives.

## Recommendations

1. Support and bolster AI technology providers like Chegg to continue to support workforce initiatives across Canada.

Used in conjunction with employers, educators and other tools, generative AI can help education at all levels be more engaging, personalized and responsive to individual learner needs. Platforms enabling this technology could, for example, help make upskilling education more inclusive and accessible by enabling learners with disabilities, learning difficulties or chronic health conditions to access education on their own terms. Providing expert advice to learners 24/7 and accessible anywhere there is internet, allows learners with different needs be able to learn in a way that negates the rigidity of traditional learning systems, increasing learner outcomes. Learners in remote or otherwise inaccessible locations also have opportunities like never before to access the best education has to offer.

We recently announced Chegg's new generative AI product, an AI enhanced learning service and personalized learning assistant. Chegg's new tool is an example of generative AI use that will empower learners to learn more effectively, with a personalized approach, real-time feedback, guidance, hyper-relevant learning content and assessments generated specifically for each learner in different formats, all designed to support active engagement in their learning process. We welcome continued engagement with policymakers on how these progresses and lessons learned that could apply to broader workforce policy.

2. Develop consistent and clear definitions for AI, in consultation with leaders in AI technology and workforce development and continue engagement with these leaders when developing policy or directives.

Canadians would benefit from the use of consistent and clear definitions for AI, machine learning, generative AI, and large language models across all government agencies and one that is interoperable across the world. Tools that incorporate elements of AI are being used across nearly every industry. This means that a wide range of stakeholders across government will ultimately need to weigh in on requirements for the development and use of AI.

Lack of coordination may result in fragmented oversight, insufficient protections, unclear obligations on regulated entities, and inconsistent enforcement across different sectors. Further, the differing approaches can result in a lack of coordination between regulatory bodies and could create confusion as to how organizations should be compliant with the law or create conflicting regulatory requirements for the private sector.

We support a similar approach to that applied in the United States where many AI stakeholders are applying the NIST AI RMF to review and examine their systems for determining and addressing risk throughout a system's lifecycle. The NIST AI RMF supports AI developers and other stakeholders in this effort by providing a risk-based, voluntary approach to incorporate trustworthiness and accountability benchmarks into the entire lifecycle of an AI system. In

addition, the NIST AI RMF appropriately recognizes that the level of risk among different AI use cases can vary significantly.

### 3. Foster Canadian's understanding of AI with the promotion of AI literacy programs.

As a result of the rapid adoption of generative AI technology by all Canadians, it is even more critical to update and promote digital and media literacy curriculums for students, and a general awareness campaign that includes AI literacy. Partnering with trusted AI technology leaders to help Canadians learn about AI literacy and keep their workforce skills relevant in this changing environment will be beneficial to employees and a competitive advantage for employers. Helping Canadians develop a curious and discerning mind toward AI systems will better prepare them to be consumers of AI-enabled products and services as well as users and developers of AI technology in their future workplaces.

Core to an AI literacy curriculum is teaching Canadians how AI is built, where the data sets required for AI systems come from, how computers learn from large data sets, and the potential for bias that those data sets and algorithms can produce. It is also important for the public to build critical thinking skills around AI generated content, both as consumers and users. Learning to ask discerning questions about the origins of and content contained in AI generated text, images, audio and video will better prepare students to spot deep fakes and be less susceptible to deception.

### 4. The Creation of an AI Commissioner

Chegg appreciates the creation of the AI and Data Commissioner, under Bill C-27, as an independent body that will monitor compliance and intervene in AI systems, where necessary. Chegg believes that this person should have a well-rounded knowledge, not only in AI systems, but in companies that develop in-house systems and that this Commissioner have a staff of experts, focused in multiple areas, including education and business. This AI Commissioner should work with industry to enhance the development of AI systems, rather than be a regulatory body specifically designated to enforce and penalize companies. Combining the functions of enforcement and advancement will allow this position to best lay the framework for a robust AI industry in Canada and ensure products that are used in Canada meet Canadian standards. Chegg believes the Office of the Commissioner should be a "two-way street" of information whereby the flow of information both comes freely into and out of the office to set a global standard for effective and safe use of AI.

## **Chegg**

As a leading student-first global ed-tech company that provides a range of digital tools to help students and parents access affordable education services, Chegg is proud to support over 7.8 million students from 150 countries worldwide with over 200,000 in Canada. Chegg's software directly supports the educational outcomes of students, with on-demand services including study support, tailored subject-based study, exam preparation, content review and proofing that deliver a comprehensive and personalised learning experience.



At Chegg, we are committed to supporting ambitions in training and educating more workers to fill meaningful careers. We work with third-party skills providers to address labour shortages by offering courses directly to employees across a variety of sectors. Not only does this help companies to better attract and retain workers, but it also helps address many of the skill gaps employers are currently facing. We are also particularly proud of our language learning platform, [Busuu](#), which provides the most in-depth online language learning experience available.