October 17, 2025

Zachary Rogers
U.S. Department of Education
400 Maryland Ave SW, Room 7W213
Washington, DC 20202-6450

Re: Comment on Proposed Priority and Definitions-Secretary's Supplemental Priority and Definitions on Promoting Patriotic Education Docket ID <u>ED-2025-OS-0745</u>

Dear Mr. Rogers,

We provide these comments on the Department of Education's proposed priority for patriotic education and its associated definitions.

Summary

While this priority is situated in a shared belief that students benefit from an emphasis on history and civics education, the proposed priority and its definitions require significant modification. This proposed priority is one of many ongoing efforts by the administration to override state and local control of education to impose a dishonest and politically motivated curriculum. We identify opportunities for adjusting this priority and recommend that recent grant cancellations be reversed. These changes would ensure that federal investments live up to stated principles, as defined in the purpose for American History and Civics-National Activities Grants, for an informed citizenry and recognition of the educational needs of all students, with consideration for students from low-income backgrounds and underserved populations.

The Need for History and Civics Educator Support

EdTrust supports the idea that the teaching of history and civic education in the United States is critical and deserving of federal support. Civics education has not been prioritized by the federal or many state governments for decades, despite the fact that parents across the political spectrum agree that preparing students to be good citizens should be an educational priority. Many teachers feel unprepared to teach civics and multiple generations of Americans are unable to demonstrate strong civics competency.

But states and local programs would benefit from greater federal support that helps teachers provide accurate and honest education, rather than be restricted by the narrow definitions of patriotism outlined in this proposed priority.

Most teachers and principals believe there should not be legal limits on classroom conversations about historical, social, and political issues, including gender and race, but teachers are subject to censorship laws that ban these discussions in 20 states.

Censorship laws and other efforts, like this proposed priority, to whitewash the painful parts of American history in favor of only stories that present our nation's history in a

positive light, undermine the free expression that is at the heart of the First Amendment, constrain students' learning opportunities, and diminish their sense of belonging and ability to empathize. Two-thirds of teachers already limit any instruction that touches on these issues, even when they are not subjected to censorship laws. Therefore, though the goals of this proposed priority are important, we suggest a definition of "patriotic education" that favors the open exchange of ideas and expansive views of history and patriotism, rather than the narrow definitions outlined in the proposed priority.

Defining an Accurate and Expansive View of Patriotism

An accurate, expansive, and rich view of American history and patriotism is one that recognizes both America's failures and successes, allows students to see themselves among our nation's heroes, and recognizes the lingering effects of the more painful parts of American history. It is not, as the Department proposes, one that is politically narrow and inaccurate, and ultimately anti-American.

Consider its requirement that a patriotic education requires the teaching of an "ennobling" view of America's founding that is "unifying" and "inspiring." It is far from "ennobling" to learn that, at this country's founding, enslaved Black Americans were counted as three-fifths of a person. It is far from "inspiring" to learn the history of how America's early leaders systematically mistreated its indigenous population. The work of many of our civil rights heroes, from the National Women's Party's militant tactics in support of women's suffrage, to Black leaders' deliberate lawbreaking in pursuit of equal rights in the 1950s and 60s, was far from "unifying" at the time they undertook it, and in some cases, to this day. Yet failure to teach students about any of these facts would be educational malpractice. They are key moments in American history that led to important civil rights protections for women and Black Americans.

Similarly, it would fail our nation's students to imply that we have "admirably grown closer" to our nation's founding principles of life, liberty, and the pursuit of happiness, as laid out in the grant priorities. Ruby Bridges — a historical figure who is still living — bravely integrated her elementary school 65 years ago, yet more than a third of American students still attend a highly segregated school. The final goal of an equitable American experiment has not yet been achieved. It would be wrong to teach students it has, particularly when so many are still living with the consequences of our failure to meet that goal.

Historical thinking requires the ability to handle varied and contradictory evidence, yet the definition of the American political tradition for this proposed priority specifically centers and limits the focus on the "influence of western civilization," overlooking the vast traditions and cultures that shape the "accurate, honest" definition of patriotism. Learning about positive outcomes from the past can be as important as learning about our mistakes, but this lesson too requires a recognition of change, not a singular view that America was unimpeachable at its founding and no lessons needed to be learned since.

Supporting Local and Place-Based History and Civic Engagement

Federal competitive grant opportunities have always been carefully designed to avoid defining educational content that would violate the General Education Provisions Act (GEPA), 20 U.S.C. § 1232a, which reads:

No provision of any applicable program shall be construed to authorize any department, agency, officer, or employee of the United States to exercise any direction, supervision, or control over the curriculum, program of instruction, administration, or personnel of any educational institution, school, or school system [...].

Yet, this proposed priority asserts a top-down determination of history and civics curriculum that will "transmit to all American students a shared understanding of our political, economic, intellectual, and cultural history."

Given the changes the Trump administration has made at the <u>Smithsonian</u> and <u>National Parks</u>, a commitment to <u>officially declare that the perpetrators of massacre</u> in our history were actually heroes, and its broader efforts to <u>dismantle programs that support students of color</u>, it's clear there is a coordinated effort to whitewash the painful parts of American history and hide the fact we, as a country, still have a long way to go.

This is particularly concerning in light of the Department of Education's choice to meet the above purpose through the development of the America 250 Civics Education Coalition, a highly partisan and political venture to bring together organizations like the Heritage Foundation, Turning Point Education, PragerU, Hillsdale College, and others under the leadership of the America First Policy Institute, a conservative think tank. These organizations are not experts in history or education. These are politically aligned organizations that vilify LGBTQ+, immigrant, and Black and Latino communities and the children within them. These organizations have made it clear that the history education they imagine for students is an education that distorts facts and truth, and includes claims: that America was a leader in abolishing slavery, despite being one of the last Western countries to do so; that portrays Native Americans as warlike; that envisions the country's founders as godlike men while denigrating Progressive Era legislation and American universities; that denies climate change is a social concern; that pushes students to cite Biblical scripture in historical analyses; and that argues that women and LGBTQ+ individuals should not have equal societal rights.

The United States citizenry is not fearful of an inclusive and rich history education that confronts America's accurate, honest past, and they trust teachers to decide what students should learn. In a 2023 Gallup poll, a majority of respondents of all races and political backgrounds supported teaching the history of racism in the U.S and its current impacts. Seventy-five percent of respondents in a 2023 Ipsos poll agreed with the statement, "Teachers are professionals who should be trusted to make decisions about classroom curriculum."

The funding for this proposed priority is concerning not just because it demonstrates a top-down and federal effort to define curriculum, but that it does so at the expense of programs that would provide an accurate, honest history education. Programs that fund training for future educators learning about Black, Mexican, and LGBTQ+ history have been <u>cut</u> in favor of this new initiative. The premature cancellation of grants, <u>targeting many grants awarded during the Biden administration</u>, appears to be a political project rather than a project that is in the best interest of students. The fact that one National Council for History Education (NCHE)-affiliated grant for a project that trained teachers in the St. Louis area in civil rights education has been canceled while a similar NCHE-affiliated project in Broward County has not, provides additional support that the canceling of grants is a political decision.

Defining a Forward-Looking Patriotic Education

We believe that federal grants should support locally determined explorations of history and civic engagement rooted in the political, economic, intellectual, and cultural history of student lives. Civic engagement is not an explicitly national project determined by political powers at the federal level.

Trust in the federal government <u>has waned for decades</u>. As explained by the <u>Pew Research Center</u>, social trust is critical to the American experiment and its success, because it <u>benefits the economy</u>, it makes it <u>easier for people to work together</u>, and it is associated with <u>better-functioning democratic institutions</u>.

As the proposed priority identifies, most Americans engage with one another at the local level, such as through institutions like centers of faith, schools, and associations, but participation at this local level has also been <u>declining</u>. Notably, there has been an increase in <u>civic deserts</u>, "places without adequate opportunities for civic engagement — places for discussing issues, addressing problems together, and forming relationships of mutual support."

Young Americans trust their <u>peers and neighbors</u> and one of the few social institutions that are both present across communities and consistently trusted are <u>public schools</u>.

Many grant programs that support this localized approach to history education and civic engagement are those that <u>have been or may soon be canceled</u> by the Department of Education. For example, Senator Lisa Murkowski (R-AK) has written in support to appeal the <u>revocation</u> of the See Stories grant for "<u>Anchored Histories Teacher Professional</u> <u>Development</u>. The project trains <u>teachers and students</u> in researching community history and building social ties to that history through digital storytelling and archivism.

Highly regarded programs that have been identified as valuable to states and aligned to state standards have also been identified for revocation of competitive grant funding. For example, an Assistance in Arts Education program that had its final year of funding rescinded because it included state-required language about a commitment to a diverse candidate pool. The Milwaukee Roots Initiative, another National Activities Grant award

that prioritized place-based engagement between educators, local historians, and students to conduct historical inquiries, as emphasized in the Wisconsin social studies standards, was also flagged for revocation.

Conclusion

States and local programs would benefit from greater federal support to provide accurate, honest history education. However, a definition of "patriotic education" that narrowly focuses on western civilization and an ennobling revisionism of U.S. history communicates to educators, parents, and students that reality and truth do not belong in schools. Combined with other efforts by the administration to empower political allies in developing a patriotic history curriculum and to control the freedom of museums and other institutions in shaping our collective memory, the proposed definition can accurately be described as part of a propaganda project. The target of this propaganda project is not only political, however, as this proposed priority is one of many administrative actions that will harm Black, Latino, and LGBTQ+ students, and their families.

The Department of Education should reverse the cancellation of grants previously awarded, particularly for programs that build civic engagement at the local level and are supported by states, where autonomy over curriculum is legally required. A waning public trust in federal institutions is only further damaged by canceling awards that build civic engagement and patriotism. Applicants to grants utilizing this new proposed priority cannot reasonably invest in projects that require hiring workers and extending sufficient resources if there is a likelihood these same projects will have funding cut after the first year or two.

We also suggest a definition of "patriotic education" that favors the open exchange of ideas and expansive views of history and patriotism, and that helps students develop critical thinking skills through the ability to handle varied and contradictory evidence. In the expressed interests of American families and educators, we suggest a civic-minded definition that reflects our multi-cultural representative democracy and that acknowledges how engagement with difference in our society has been our strength.

Thank you for your consideration.

Sincerely,

All4Ed
Applied Learning Insights LLC
EDGE Partners
Education Law Center-PA
EdTrust
Integrated Schools
League of Education Voters
National Coalition on School Diversity
National Parents Union

National Women's Law Center Public Advocacy for Kids (PAK) The Civil Rights Project/Proyecto Derechos Civiles at UCLA