

March 27, 2026

Lesley Muldoon, Executive Director
National Assessment Governing Board
400 Maryland Avenue SW
Washington, DC 20202

Re: Comment on the NAEP Civics Assessment Framework Docket ID [ED-NAGB-2026-02980](#)

Dear Ms. Muldoon,

EdTrust appreciates the opportunity to provide comments as the National Assessment Governing Board (NAGB) considers an update to the NAEP Civics Assessment Framework. As an education equity organization committed to advancing policies and practices to dismantle the racial and economic barriers in the American education system, we have a strong interest in the civic engagement of students and their ability to shape society. Therefore, we believe in a national civics assessment that helps us better understand civics education across the nation.

We support updating the NAEP Civics Assessment Framework. Much has changed for the civic realities of students' lives since the framework's last substantial update three decades ago. An updated framework should reflect the diverse ways Americans engage in civic life, so that it produces data valuable enough for states to voluntarily participate and benefit from state-level reporting. It should also maintain its integrity as an assessment tool, and be able to provide meaningful data, particularly in a political moment when there is active, organized pressure to narrow the definition of civics education.

Why the Framework Needs Updating

There is broad consensus that K-12 students need more and better civics education, and that assessing what students know is a necessary step for improving it. As NAGB members Marty West and Patrick Kelly have [noted](#), the framework reflects a time when punch ballots were common and before social media fundamentally reshaped political engagement. The framework has not been substantially revised since 1998. In the time since, civic life in the United States has changed in ways the current framework cannot capture. Americans access political information through starkly different sources and formats, and the growth of misinformation has had clear [impacts on civics education](#).

The need is underscored by student outcomes in the most recent NAEP civics assessment in 2022, where the average score [dropped significantly](#) for the first time in its history. Nearly one-third of eighth graders did not meet the NAEP Basic score, a level that would indicate the student could likely do things like [identify equality under law, consent of the governed, and natural rights](#). Meanwhile, there are few opportunities to assess civics knowledge. Most states do not require civics assessments. The NAEP civics assessment, which is not

federally required, tests only eighth graders once every four years. Organizations like CivxNow and iCivics have made the case for the importance of this update, and we echo their call.

An Updated Framework Should Reflect Students' Lived Civic Realities and Create Value for States

Most people do not plan to run for political office or engage directly in representative government beyond voting in elections. For many, civic engagement includes community organizing, navigating public institutions, establishing mutual support and accountability across faith communities and neighborhood groups, and advocacy for the rights and resources their communities need. As is evident at this very moment, from Minneapolis to Burlington, Vermont, communities vocalize their interests through a variety of platforms and organized activities like protests, even as that fundamental right is [challenged](#). A framework that reflects a broader, more accurate picture of civic life in the United States will produce richer and more useful data and could signal to states that their standards and frameworks should reflect civics education that includes civic knowledge as well as [the development of civic skills and dispositions](#). Students learn and perform better when teaching accurately reflects the complexity of the world they inhabit, and that teaching is driven by how students are assessed.

In 2030, NAEP civics results will be reported at the state level for the first time, though there are [concerns](#) that few states will opt in, limiting the value of the resulting state-level data. State-level NAEP data in reading and math has motivated significant policy action precisely because it provides a shared benchmark that state leaders find useful. Civics data could do the same, but only if the framework reflects the breadth of civic knowledge and engagement that matters to diverse state constituencies. A framework that is too narrow, because it is outdated or because it has been captured by a particular ideological vision, will not generate the kind of data that gives states a good reason to participate.

Guarding the Integrity of This Process

We raise these concerns about what the framework captures because the risks are not hypothetical. Organizations like the National Association of Scholars and the Civics Alliance have already submitted a [comment](#) urging NAGB to align the framework with specific ideological curricula, including the Hillsdale College K-12 History & Civics Curriculum and the Civics Alliance's own model standards, and to strip participatory and "action civics" from the framework entirely. The suggestion is that civics should be learned but not practiced: students should study a version of history that, as the National Council for the Social Studies [has noted](#), presents a selective and singular narrative "minimizing the experiences, contributions, and perspectives of Indigenous peoples, people of color, women, the LGBTQIA+ community, the working class, and countless others," and that students should not engage in the real-world problem-solving that experts [broadly agree](#) is essential to civic learning and engagement. This version of history and civics education is central to a broader, coordinated effort across levels of government that includes the Department of Education's emphasis on "[patriotic education](#)," the America 250 Civics

Education Coalition led by the America First Policy Institute, and state-level initiatives to restrict discussions of race and gender while teaching American history.

As we noted in our recent [public comment](#) on the Department of Education’s proposed “patriotic education” priority, the organizations behind these efforts — which include the Heritage Foundation, Turning Point Education, PragerU, and Hillsdale College — are not experts in history education or assessment. They are politically aligned organizations promoting a vision of civics that distorts the historical record and excludes the experiences of large segments of the American public. Their vision of civics education is not one that should shape a national assessment framework designed to serve all students.

NAGB’s own [Framework Development Policy](#) commits to constructing panels of experts with a diversity of backgrounds, expertise and perspectives, that are diverse in role, gender, race and ethnicity, region, and expertise, including educators from schools that serve students from high-poverty backgrounds. We urge the Board to maintain this commitment and to intentionally and exhaustively elicit a diversity of expertise in updating this framework. This framework update process must not become a vehicle for advancing a narrow ideological agenda that contradicts the civic realities of the nation’s students, and it is essential that its panel of experts are committed to developing a framework rooted in an accurate, objective, and honest history education.

We encourage NAGB to update the NAEP Civics Assessment Framework with two priorities in mind: First, the updated framework should reflect the diverse ways that Americans engage in civic life, ensuring the assessment produces data that is genuinely valuable to states and motivates their voluntary participation in state-level reporting. Second, the Board should hold firm to its own policies ensuring a balanced process and resist pressure to minimize its own independence and align the framework with the narrow ideological position of organizations like the National Association of Scholars and the Civics Alliance. The Nation’s Report Card in civics can be a powerful tool for understanding how well we are preparing the next generation as an engaged populace, but only if the framework behind it is honest and inclusive.

Thank you for your consideration.

Sincerely,

EdTrust