



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 ED-2025-OS-0745

Dear Mr. Rogers,

The American Association of University Women (AAUW) submits these comments on the Department’s proposed priority and definitions for “Promoting Patriotic Education.” AAUW advances gender equity through research, education, and advocacy; for more than 140 years, AAUW has supported evidence-based policy and funded scholars whose work strengthens our democracy.

Summary of AAUW’s position

AAUW supports robust, high-quality instruction in American history and civics. But the proposed “patriotic education” priority adopts an ideological frame that risks distorting curriculum, chilling honest teaching, and undermining state and local control. It also conflicts with federal statutes that guard against federal direction of curriculum. We respectfully urge the Department to withdraw the proposed priority in its entirety and, if it proceeds at all, to replace it with a content-neutral, evidence-based approach that protects academic freedom, welcomes honest history, and centers students’ critical-thinking skills.

AAUW’s policy principle and why this proposal falls short

AAUW’s policy principle is clear: “Ensure that all curriculum represents historically accurate information and scientific consensus, free from censorship and political, religious, or cultural bias.” A federal grant priority that prescribes an “ennobling,” “unifying,” and “inspiring” portrayal of the nation — while sidestepping enslavement, Indigenous dispossession, Jim Crow, ongoing segregation, and other difficult truths — invites selective storytelling rather than scholarship. As historians remind us, patriotism rooted in truth empowers students to improve the republic; patriotism that suppresses inconvenient facts undermines it.

The Department’s own docket states the priority will “focus grant funds on programs that promote a patriotic education that cultivates citizen competency and informed patriotism,” with definitions that elevate a celebratory narrative of the “American political tradition.” Standing alone, those definitions privilege one worldview, narrowing rather than enriching students’ understanding.

Federal overreach and legal guardrails

For decades, Congress has drawn bright-line limits to keep the federal government out of curriculum control. The Elementary and Secondary Education Act (as amended) and the Department of Education Organization Act protect state and local authority over curriculum, instructional materials, and library content. The coalition letters you have received detail those guardrails and explain why using competitive grants to steer *what* is taught — not simply *how well* it is taught — is unlawful. AAUW agrees with that analysis and incorporates it here.

Troubling implementation context: \$153M in seminars grants and a partisan coalition



AAUW is concerned that the Department has already moved substantial resources and convening power behind a single ideological frame:

- On September 29, 2025, the Department announced over \$153 million in American History and Civics Seminars grants — the largest such investment to date.
- On September 17, 2025, the Department publicized the “America 250 Civics Education Coalition,” coordinated with the America First Policy Institute and featuring groups such as Turning Point USA, Hillsdale College, Heritage Foundation, Moms for Liberty, and PragerU. The Department’s press release and the coalition’s own materials describe a federal-partnered network organized to advance this approach.

AAUW does not question the importance of civics education — we applaud it. But publicly aligning federal priorities and convenings with a single political network risks substituting advocacy for scholarship and will inevitably chill participation by educators and institutions that do not share that ideological stance.

Moreover, credible civil society watchdogs have raised substantive concerns about some coalition participants — for example, the Southern Poverty Law Center’s profiles of PragerU and its case study on Turning Point USA document ties to far-right networks and extremist-aligned content; and PEN America and the American Library Association have repeatedly found that organized groups such as Moms for Liberty are major drivers of book bans and educational censorship — underscoring the risk of elevating advocacy over scholarship.

A broader pattern of whitewashing public history

This proposed priority does not arise in isolation. Recent changes to National Park Service interpretive signage have been criticized by the National Parks Conservation Association as efforts to “rewrite American history” and ask the public to dispute vetted historical facts — a move widely seen as undermining the Park Service’s mission. When federal agencies curate public history to emphasize “positive” narratives while sidelining painful truths, schools and teachers feel pressure to follow suit. The Department should not compound that trend by embedding similar constraints into K-12 grant priorities.

Risks to students, teachers, and communities

Educators already face censorship laws or political pressure in many states. A federal grant priority that rewards a prescribed narrative will:

- Chill honest instruction — teachers will self-censor to avoid controversy or federal scrutiny;
- Narrow students’ civic formation — replacing primary-source inquiry and debate with preapproved talking points; and
- Erode local control — incentivizing districts to align content with Washington’s favored lens to remain competitive for funds.

Recommendations

If the Department withdraws this proposal — which we urge — it should immediately pivot to a content-neutral support strategy. If the Department nevertheless proceeds, AAUW recommends the following changes to align with law, research, and democratic values:

- Replace the ideological frame. Eliminate prescriptive adjectives like “ennobling,” “unifying,” and “inspiring,” and anchor goals in historical accuracy, primary-source analysis, critical thinking, civic participation, and media literacy — with attention to multiple perspectives, including



women, Indigenous peoples, Black Americans, immigrants, and other underrepresented communities.

- Honor statutory limits and protect academic freedom. Reaffirm ESEA/DEOA guardrails against federal control of curriculum; bar viewpoint tests in selection; include explicit non-retaliation and viewpoint-diversity protections for applicants and partners.
- Make review criteria content-neutral and outcomes-focused. Evaluate programs on educator capacity, evidence-based practices, and student outcomes — not on ideological alignment or narrative conformity — and require materials to be vetted for accuracy and scientific consensus.
- Avoid government-endorsed partisan coalitions and ensure transparency. Do not confer convening power or implied endorsement on advocacy networks; make any federal convenings pluralistic and research-grounded, with clear, public selection criteria. Audit recent awards — including the \$153M seminars grants — for compliance with content-neutral standards and publish corrective steps if needed.
- Use proper civil rights tools. When discrimination is at issue, rely on targeted, lawful enforcement through the Office for Civil Rights — not discretionary grants as de facto ideological screens.

Conclusion

A confident nation teaches its full history — triumphs and tragedies — and trusts educators and students to interrogate evidence, debate ideas, and build a more perfect union. The proposed “patriotic education” priority, as written, moves in the opposite direction: it prescribes a single lens, rewards selective storytelling, and risks politicizing classrooms. AAUW urges the Department to withdraw the proposal and pursue a content-neutral, evidence-driven strategy that equips teachers, empowers students, and strengthens our democracy.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in purple ink that reads "Meghan Kissell". The signature is written in a cursive, flowing style.

Meghan Kissell
Senior Director, Policy & Member Advocacy