

October 17, 2025

Submitted electronically via regulations.gov

Secretary Linda McMahon
U.S. Department of Education
400 Maryland Avenue SW
Washington D.C., 20202

Comment re: Proposed Priority and Definitions-Secretary's Supplemental Priority and Definitions on Promoting Patriotic Education, Docket No. ED-2025-OS-0745, 90 Fed. Reg. 44788 (September 17, 2025)

We, the undersigned organizations, strongly oppose the U.S. Department of Education's Proposed Priority on Promoting Patriotic Education. This proposal would politicize classroom instruction, erode state and local control, and undermine the integrity of our education system. We urge the Department to withdraw this proposal in its entirety.

The Department's proposal is an unmistakable act of federal overreach.

By seeking to dictate the content of classroom instruction, the Department would directly violate long-standing statutory limits designed to keep the federal government out of curriculum decisions. The Elementary and Secondary Education Act of 1965 expressly prohibits the Department from directing, influencing, or controlling instructional content, standards, or programs through grants.¹ It also forbids the use of federal funds to endorse, approve, or sanction any curriculum.² The Department of Education Organization Act also affirms the rights of state and local governments to administer educational policy, and forbids Department personnel from exercising any control over curriculum or instructional content, or over the selection or content of library resources, textbooks, or other instructional materials.³ Congress established these prohibitions precisely to prevent the federal government from imposing ideological views on students and teachers—yet this proposal does exactly that.

While the Department has at times used discretionary grants to advance educational goals, past efforts have focused on improving how students learn, not what they are taught. Previous priorities—such as the Department's 2014 and 2017 initiatives promoting Science, Technology, Engineering, and Mathematics (STEM)—emphasized expanding coursework, identifying effective instructional strategies, and increasing equitable access to rigorous opportunities. This proposed “patriotic education” priority departs sharply from that tradition. It seeks instead to

¹ Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act, 20 U.S.C. § 7906(a).

² Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act, 20 U.S.C. § 7907(b).

³ Department of Education Organization Act, 20 U.S.C. 3403(a)-(b).

control the substance of instruction by incentivizing a particular narrative of American history and national identity. That is not educational support; it is ideological enforcement.

All fifty states already require instruction in civics and government, and twenty require a civics test for high school graduation.⁴ The Department's proposed priority would distort and politicize instruction that state and local educators already provide. The result would be a federal intrusion into the classroom that undermines both the rule of law and the principle of local control in education—values that this administration purports to defend.

This proposal continues the administration's systematic campaign to silence dissent and restrict free expression across all levels of education.

The proposal is part of a broader pattern in which this administration has weaponized federal education funding to censor lawful speech and suppress diverse viewpoints. In its first month, the administration issued a now-enjoined "Dear Colleague" letter seeking to restrict classroom discussion on topics ranging from the nation's founding to systemic inequality. The Department has also participated in efforts to withhold funding from colleges that allow peaceful protest, punishing institutions for upholding constitutionally protected expression. And under Secretary McMahon, the Department's Office for Civil Rights has been perversely twisted from its core mission: designed to protect against discrimination, it has been transformed into a cudgel to police inclusive language and enforce regressive ideologies regarding race and gender.

These actions are part of a deliberate strategy to silence educators and enforce ideological conformity at every level of education. Over the past six months, it has attempted to defund programs serving migrant students, language learners, and school leaders, as well as to end support for accessible educational media through the Public Broadcasting Service and National Public Radio. Within the last month, the Department failed to fully fund programs supporting language studies, students with disabilities, and childcare for student parents. Most recently the administration invited nine universities to sign a "Compact for Academic Excellence," an action that seeks to further weaponize federal funds and politicize education.

At the same time, multiple states have partnered with the unaccredited and ideologically driven company PragerU to reshape K-12 curricula. The Department's proposed priority echoes and amplifies those state-level efforts, promoting nationalism while defunding inclusivity and suppressing dissent.

This proposal pushes a narrow ideological narrative that distorts U.S. history and privileges one worldview over all others.

Under the guise of an effort to strengthen civic education, the Department's proposal is an ideologically driven attempt to reshape how students understand the nation's history and identity. The language of the proposal makes that intent unmistakable. It describes the United States'

⁴ American Institutes for Research, *Social Studies Standards Map*, last updated June 4, 2024, <https://www.air.org/social-studies-standards-map>.

story as “noble,” “admirable,” and “inspiring,” while conspicuously omitting any acknowledgment of the displacement of indigenous peoples, the atrocities of slavery, or the systemic inequities that persist today. By presenting patriotism as blind reverence rather than informed engagement with our nation’s complex history, the Department seeks to replace critical thinking with indoctrination.

The proposal also explicitly centers “faith” and the constructed concept of “Judeo-Christianity,” an exclusionary framing that aligns with the administration’s broader Christian nationalist agenda. This includes the creation of the “Anti-Christian Bias Task Force” by executive order in February 2025—an initiative that, despite its name, serves to privilege certain religious beliefs while marginalizing others. Embedding this worldview into federal education policy violates our nation’s fundamental founding principle of religious neutrality and undermines the inclusive civic education that a pluralistic democracy requires.

Taken together, the proposal’s selective historical narrative and sectarian framing reveal not an effort to promote unity, but an attempt to elevate one ideology at the expense of truth, diversity, and constitutional values.

This proposal would silence educators and stifle honest instruction through fear and intimidation.

If finalized, this proposed priority would have a chilling effect on truthful and inclusive instruction across the country. Educators and schools would face mounting pressure to self-censor out of fear of drawing scrutiny, losing funding, or becoming the target of politically motivated investigations. Even the possibility of such retaliation is enough to distort how history is taught and discussed, silencing the very inquiry and debate that define a healthy democracy.

This dynamic is not hypothetical. Over the course of this administration, we have seen institutions, educators, and advocates preemptively curtail their own speech to minimize harm to their communities. The pattern is unmistakable: directives that narrow the scope of permissible teaching, threats of funding loss for disfavored programs, and public denunciations of educators who dare to discuss issues of race, gender, or inequality. As our education system is increasingly defined by fear and compliance, the result will be a generation of students denied the tools to think critically about their country’s past and future.

This escalating campaign of intimidation reflects an authoritarian drift that endangers democracy itself. This administration has repeatedly shown contempt for the checks and balances that constrain executive power—defying court orders, questioning election results, and penalizing dissent. Encouraging teachers to promote nationalist propaganda is not an act of patriotism; it is an attempt to control thought. History teaches us where such efforts lead. When governments dictate what truths may be told, democracy itself is imperiled.

For all these reasons, we urge the Department of Education to withdraw this proposed priority in its entirety, and focus instead on expanding opportunity, supporting teachers, and strengthening the evidence-based programs that help all students learn. True patriotism is rooted in curiosity, honesty, and a commitment to continual improvement, not in enforced nationalism or selective memory. To preserve the integrity of public education and the health of our democracy, the Department must abandon this misguided proposal and recommit to fostering classrooms where truth—not ideology—is the guiding principle.

Sincerely,

Democracy Forward

African American Policy Forum

American Association of University Women (AAUW)

American Humanist Association

Applied Academic Solutions

Asian Americans Advancing Justice - AAJC

Blue Ocean Faith Columbus

Brown's Promise

Chicago Women Take Action

Education Law Center Pennsylvania

Equal Justice Society

Girls Learn International

Grantmakers in the Arts

Honesty for Ohio Education

Human Rights First

Indivisible Marin

Just Solutions

Lambda Legal

LOVEboldly

National Center for Youth Law

National Council of Jewish Women

National Employment Law Project

National Organization for Women

Nava Consulting LLC

Nonprofits Counsel

People For the American Way

People Power United

Popular Democracy in Action

Race Forward

Right to Be

San Francisco Education Alliance

Secure Elections Network

The Sikh Coalition

Transgender Law Center