



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Education & Early Development

OFFICE OF THE COMMISSIONER

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March 23, 2026

U.S. Department of Education  
National Assessment Governing Board

Re: Public Comment on the NAEP Civics Assessment Framework

The Alaska Department of Education and Early Development (DEED) appreciates the opportunity to provide feedback on the NAEP Civics Assessment Framework (NCAF). NAEP plays an important role in helping states understand how well students are developing the knowledge and skills necessary for informed civic participation. Although Alaska does not conduct the NAEP Civics Assessment currently, we value the opportunity to contribute to the continued improvement of this assessment.

Overall, the current NCAF rests on a sound theoretical foundation that should be preserved. The framework draws heavily from the *National Standards for Civics and Government (NSCG)*, which reflect a broad national consensus on the core knowledge, skills, and dispositions necessary for effective civic education. These standards informed the original drafting of the NCAF and have also influenced more recent state-level work in Alaska. The NSCG served as a foundational document in the design and drafting process of the recently adopted Alaska Social Studies Standards. As a result, there is close alignment between Alaska's Social Studies Standards and the NCAF. This alignment benefits Alaska students and educators by ensuring that what is assessed nationally is broadly consistent with what is expected in classrooms across Alaska. For this reason, we encourage any revision process to maintain the core conceptual framework and theoretical grounding that currently exist.

While the foundation of the NCAF remains strong, updates could improve its usefulness and relevance. One area for improvement is accessibility for educators. The NCAF is a long, dense, and complex technical document. Many educators do not have the time or capacity to engage deeply with such a document, especially those teaching in small or rural schools with limited instructional support. However, within the framework there are moments of clear, specific, and actionable information that could be highly valuable for classroom practice. Unfortunately, these insights are often difficult to locate within the broader text. Revising the NCAF to foreground and organize these practical elements would make the framework more teacher-friendly, perhaps through summaries, guidance sections, or educator-focused resources. Increasing the clarity and accessibility of the framework would help educators better understand the assessment expectations, which would positively impact students' preparation, experience, and performance.

A revision should also consider how the civic landscape has evolved since the framework was last updated. Today's students navigate a civic environment shaped by rapid technological change and new forms of information exchange. Topics such as digital literacy, the saturation of social media in everyday life, and the proliferation of artificial intelligence are now central to how students across the country encounter civic information and engage with democratic institutions. While the core principles of civic knowledge remain unchanged, the contexts in which students apply them have shifted significantly.

The Civics Dispositions section of the NCAF may be a particularly appropriate place to address these developments. Expanding this section to incorporate competencies related to evaluating digital information, understanding the influence of AI, and engaging constructively in a polarized civic climate would better reflect the realities students face today. These additions would ensure the assessment remains relevant and would not require restructuring the framework's foundational concepts.

In summary, the Alaska Department of Education and Early Development believes that the NAEP Civics Assessment Framework continues to rest on a strong conceptual foundation that should remain intact. At the same time, revisions could make the framework more accessible to educators and more reflective of the current civic context. Improving clarity and usability for teachers, while thoughtfully incorporating contemporary civic challenges such as digital information environments and technological change, would strengthen the framework and enhance its value for students, educators, and community stakeholders alike.

Thank you for your consideration

Sincerely,

A handwritten signature in black ink, appearing to read 'Deena M. Bishop', with a stylized flourish at the end.

Deena M. Bishop, Ed.D.

Commissioner of Education and Early Development

To: National Assessment Governing Board, U.S.  
Department of Education  
From: The Bill of Rights Institute, Arlington, VA  
Re: NAEP Civics Framework

March 27, 2026

A free society depends on citizens capable of self-governance, those individuals who understand the principles of constitutional government, can reason from them, and are prepared to act with responsibility and respect for the rights of others. Civic education, at its best, is the formation of those citizens.

The Bill of Rights Institute (BRI) is dedicated to that work. As a national nonprofit organization, we partner with educators and students across the country to advance civic and history education grounded in the principles of the American founding. Through curriculum, professional development, and school partnerships, we seek to ensure that young people develop not only knowledge of institutions, but the judgment, habits, and civic virtues necessary to sustain a constitutional republic.

We write in response to the request for initial public comment on the NAEP Civics Assessment Framework. We believe the framework should be updated, not to broaden its ambitions, but to bring greater clarity to them. After more than two decades of largely unchanged performance on NAEP civics assessments, there is a clear opportunity to more intentionally align what is measured with the essential aims of civic education: understanding first principles, reasoning about public questions, and participating in the shared work of self-government.

### **Need for Greater Conceptual Coherence**

The American constitutional system is grounded in a set of enduring principles—natural rights, popular sovereignty, the rule of law, limited government, separation of powers, checks and balances, federalism, and equal protection. These principles are not simply one category of content among many; they provide the conceptual foundation that gives meaning to institutions, rights, and civic responsibilities. The current NAEP framework includes these principles, but they are not consistently treated as the organizing structure of civic understanding. Instead, they are often embedded within broader topical categories. As a result, assessment may capture familiarity with institutions without fully capturing students' understanding of the principles that justify and constrain them.

A revised framework would benefit from making constitutional principles more explicit as the conceptual spine across content areas. Doing so would not expand the scope of the assessment, but would improve coherence and clarity, helping ensure that what is measured reflects the underlying logic of the constitutional system.

### **Strengthening Civic Reasoning**

The framework's inclusion of intellectual and participatory skills appropriately recognizes that civic learning requires more than knowledge alone. At present, however, there is an opportunity to strengthen the emphasis on civic reasoning as a central competency.

Self-government depends on citizens who can interpret foundational texts, analyze competing arguments, and apply constitutional principles to new circumstances. These capacities are distinct from both factual recall and generalized participation. They require students to reason from principles, not simply recognize them. A revised framework should more clearly prioritize this form of reasoning by encouraging assessment items that require students to engage with primary sources, evaluate arguments grounded in constitutional principles, and apply those principles in unfamiliar contexts. Such an approach would increase rigor while maintaining NAEP's essential commitment to nonpartisanship.

### **Experiential Civic Learning and the Practice of Association**

Civic knowledge and reasoning develop most fully when students have opportunities to practice civic life, not simply study it. Experiential civic learning, structured opportunities for students to engage in deliberation, collaboration, and problem-solving around public issues, plays a critical role in developing the habits of mind and action necessary for self-governance. The American tradition has long recognized the importance of what Alexis de Tocqueville described as the "art of association": the capacity of individuals to come together voluntarily to solve problems, pursue shared aims, and sustain civil society. This associational life is a defining feature of American democracy, bridging the space between the individual and the state.

Yet the knowledge and skills required for effective association, such as how to deliberate with others, organize collective action, navigate disagreement, and act within lawful and constitutional bounds, are not always explicitly taught or assessed.

A revised NAEP framework should more clearly reflect this dimension of civic life. While large-scale assessment cannot directly measure participation, it can assess whether students understand how civil society functions, the role of voluntary associations in a constitutional republic, and the norms that sustain productive civic collaboration. It can also distinguish between lawful, constructive engagement and actions that undermine constitutional order.

Incorporating these elements would align the framework more closely with the reality of American self-governance, in which civic life extends beyond formal political institutions into the broader sphere of civil society.

### **Clarifying the Role of Civic Dispositions**

The inclusion of civic dispositions reflects a longstanding understanding that constitutional government depends on civic character as well as knowledge and skill. At the same time, the assessment of dispositions through large-scale standardized instruments presents inherent challenges.

Research across the field of civic measurement underscores the difficulty of defining and measuring dispositions in ways that are consistent, reliable, and valid at scale. When dispositions are treated as objects of direct measurement, assessments risk relying on indirect or ambiguous proxies, which can complicate interpretation.

This challenge does not diminish the importance of civic virtue. Rather, it suggests the need for greater precision in how dispositions are incorporated into the framework. A revised approach would focus on what can be measured with validity: students' understanding of why civic virtues matter in a constitutional republic, their ability to recognize virtuous and unvirtuous civic behavior in context, and their knowledge of lawful, rights-respecting forms of participation. Such an approach would preserve the central role of civic character while strengthening the integrity of the assessment.

### **Civic Virtue and the Practice of Self-Governance**

The American founding tradition makes clear that institutions alone are insufficient to sustain a free society. Citizens must be capable of exercising virtues such as respect for the rule of law, responsibility, perseverance, civil discourse, and respect for the rights of others.

These virtues are expressed not only in political participation, but in the daily practices of civil society. Students should understand how these virtues operate in contexts of disagreement, cooperation, and shared problem-solving. Assessment can meaningfully address this dimension by asking whether students recognize the role of these virtues in sustaining constitutional government and associational life. In doing so, the framework can connect civic knowledge and reasoning to the lived practice of citizenship.

### **Improving Interpretation Through Context**

The persistence of largely unchanged NAEP civics results over more than two decades also raises questions about how those results are interpreted. Without sufficient contextual information, it is difficult to distinguish between differences in student performance and differences in access to high-quality civic learning opportunities.

A revised framework would benefit from greater attention to opportunity-to-learn indicators. Information about students' exposure to primary sources, participation in structured civic discussions, engagement in simulations of constitutional

processes, and involvement in experiential civic learning can help provide a clearer picture of the conditions under which learning occurs. Strengthening these contextual measures would not alter the assessment itself, but would improve the interpretability and usefulness of its results.

### **In Conclusion**

The NAEP Civics Assessment Framework reflects a strong and thoughtful foundation. The question before the Governing Board is how to refine that foundation in light of both experience and evidence.

An effective revision would clarify the constitutional principles that anchor civic understanding, strengthen expectations for civic reasoning, more fully incorporate the role of experiential civic learning and associational life, refine the treatment of civic dispositions to ensure measurement validity, and improve the interpretability of results through better contextual information.

A constitutionally limited republic ultimately depends on citizens who understand its principles, can reason from them, and are prepared to work with others to sustain a free and flourishing civil society. A strengthened NAEP framework can help ensure that national assessment reflects, and supports, that goal.

We appreciate the opportunity to provide input and thank the Board for its leadership in stewarding this important national assessment.

# CENTER FOR CIVIC EDUCATION

## NAEP PUBLIC COMMENT

**EMAIL TO:** nagb@ed.gov

**SUBJECT LINE:** NAEP Civics Framework

**DEADLINE:** March 27, 2026, 5:00 p.m. Eastern Time

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### Center for Civic Education’s Public Comment on the NAEP Civics Assessment Framework

#### Introduction

The Center for Civic Education respectfully submits this comment in response to the National Assessment Governing Board's call for initial public input regarding a potential update to the NAEP Civics Assessment Framework.

The Center speaks to this question with a depth of institutional history that is directly and uniquely relevant to the framework under review. The Center directed the development of the original NAEP Civics Framework and authored the *National Standards for Civics and Government* (1994) – the foundational document that the NAEP Civics Framework itself explicitly cites as its intellectual anchor. That work grew directly from the Center's partnership with the Commission on the Bicentennial of the United States Constitution, which produced *We the People: The Citizen and the Constitution* – now one of the most widely implemented and rigorously evaluated civic education programs in the nation, active in all fifty states for nearly four decades. Through these programs and our national network of state coordinators, the Center has worked with tens of millions of students and hundreds of thousands of teachers across every region of the country.

We offer these comments not merely as a civic education stakeholder, but as an organization whose work forms part of the intellectual foundation the current framework rests upon. We do so in a spirit of strong support for the Governing Board's efforts, and with a deep commitment to ensuring that any updated framework serves the urgent civic needs of American students and the republic they will be called upon to sustain.

We thank the National Assessment Governing Board for undertaking this important review at a moment of profound civic significance for our nation.

### **Question 1: Does the NAEP Civics Assessment Framework Need to Be Updated?**

Yes.

The 1994 framework established a durable and well-conceived foundation organized around essential civic knowledge, intellectual skills, and participatory competencies. Its core architecture remains sound. However, the civic environment in which students must operate has changed significantly in the three decades since that framework was developed. An assessment framework that does not reflect those changes risks measuring civic education as it was conceived before some of the unique challenges of our current policy landscape, increased constraints on instructional time, a more polarized social environment, and an increasingly digital age severely impacted by social media and AI .

Declining NAEP civics scores in the 2022 assessment are not an argument against updating the framework. They are an argument for it. If students are performing poorly against existing benchmarks, we must ask both whether instruction is adequate *and* whether our benchmarks fully capture the civic knowledge and capacities that matter most and are the most relevant today. The framework update is the appropriate vehicle for addressing both questions with the rigor and national authority that only NAEP can bring.

### **Question 2: Why Is a Revision Needed?**

There are four primary reasons for a revision:

- ❖ *The civic and information environment has been fundamentally transformed.* The rise of digital media, social platforms, and algorithmically curated information has profoundly altered how citizens access civic knowledge, form political opinions, deliberate, and engage in public life. Students must understand not only governmental institutions and constitutional principles, but also how information ecosystems influence democratic processes and how to evaluate civic and political information critically. These are civic competencies, not merely media literacy skills, and they belong in a civics framework. The most recent framework anticipated some of these challenges, but a framework for the 2030s must confront them more specifically and directly.
- ❖ *Constitutional understanding is more essential than ever.* Recent civic tensions underscore the importance of deep, applied knowledge of constitutional principles: separation of powers, federalism, checks and balances, individual rights and responsibilities, the amendment process, and the rule of law. An updated framework should strengthen and clarify expectations for this foundational constitutional knowledge, ensuring that students do not merely recognize these principles but understand how they may be applied in current constitutional questions.

- ❖ *The framework can better reflect the inseparability of civic knowledge and civic participation.* The *National Standards for Civics and Government*, which undergird the existing framework, were always clear that civic knowledge alone is insufficient to fostering a self-governing citizenry. Informed, responsible participation in constitutional democracy requires knowledge *and* the intellectual and participatory skills to act on that knowledge. Research on the Center's flagship programs, *We the People* and *Project Citizen*, have demonstrated for decades that students who apply civic knowledge in authentic participatory contexts develop measurably deeper and more durable civic understanding and a disposition for life-long engagement. The framework should be updated to assess participatory competencies with the same rigor applied to civic knowledge content however possible.
- ❖ *Significant advances in civic education research and practice have occurred since 1994.* The field has generated a substantial evidence base regarding effective civic learning, including the demonstrated impact of deliberative discussion, simulations of democratic processes, inquiry into public policy, and portfolio-based authentic assessments. Much of this body of research has been led by the Center for Civic Education in partnership with Georgetown University's Center for Civic Education Research Lab. As a result of years of rigorous research, the fifth edition of *We the People: The Citizen and the Constitution* stands as a reflection of this accumulated research in practice as it has been updated to address contemporary civic realities while preserving its constitutional core. An updated NAEP framework should draw on this accumulated knowledge to ensure it measures the civic competencies that research and experience have shown to matter most.

### **Question 3: What Should a Revision Include?**

The Center recommends that the following principles guide the revision process.

- ❖ *Preserve and strengthen the constitutional and foundational knowledge core.* The framework's focus on civic knowledge, intellectual and participatory skills, and civic dispositions remains conceptually strong and should be retained. Its grounding in constitutional democracy – the historical and philosophical foundations of the Constitution, separation of powers, federalism, individual rights and responsibilities, the rule of law, and the responsibilities of citizenship – must remain central and non-negotiable. Declining scores are a reason to strengthen this foundation, not to dilute it. Any revision that diminishes the framework's commitment to deep constitutional knowledge would be a profound step backward at exactly the moment when that knowledge is most needed.
- ❖ *Elevate participatory and deliberative competencies with authentic assessment dimensions.* The framework should develop innovative assessment approaches for civic participation skills – including the ability to identify public problems, research and evaluate policy alternatives, engage governmental processes, and deliberate constructively across differences to build consensus. The six-unit conceptual structure of *We the People: The Citizen and the Constitution* offers a proven,

classroom-tested model for integrating constitutional knowledge with applied civic reasoning and participatory skill through simulated congressional hearings. The units of assessment focus on the following curricular questions: 1) What are the philosophical and historical foundations of the American political system?; 2) How did the Framers create the Constitution?; 3) How has the Constitution been changed to further the ideals in the Declaration of Independence?; 4) How have the values and principles embodied in the Constitution shaped American institutions and practices?; 5) What rights does the Bill of Rights protect?, and 6) What are the responsibilities of citizens? This structure informed the original NAEP framework and remains conceptually robust as a reference for the revision.

- ❖ *Incorporate civic information and media literacy as an assessable civic dimension.* Students should be assessed on their capacity to evaluate the credibility of public and political information, identify bias and misinformation, and understand the role of media in a free society. This inclusion should remain nonpartisan and grounded in the skills of evidence-based reasoning and civic analysis.
- ❖ *Reflect contemporary forms of civic participation while anchoring in enduring democratic processes.* The framework should recognize evolving forms of civic engagement, especially in the digital space, while maintaining emphasis on the foundational processes of constitutional democracy: voting, jury service, petitioning, community problem-solving, and deliberation in the public sphere.
- ❖ *Expand grade-level assessment.* Assessing only grade 8 limits NAEP's ability to track civic knowledge development across the K–12 continuum and deprives educators and policymakers of actionable data at critical developmental junctures. The Center implores the Governing Board to explore restoring assessment at grades 4 and 12, which would provide a far more complete picture of how civic learning develops and where it most needs support.
- ❖ *Maintain nonpartisanship and intellectual rigor throughout.* The NAEP Civics Assessment must continue to avoid ideological bias and reflect broad national consensus about the knowledge and skills required for citizenship in a constitutional democracy. Assessment items should measure reasoning, analysis, and applied understanding and not ideological alignment. The assessment must also counter the pull of presentism, or measuring more narrow knowledge of present day issues, and instead give every effort to measure enduring principles that can frame any contemporary topic in an evergreen manner. The nonpartisan credibility of NAEP is one of its most important civic assets, and it should be vigorously protected in the revision process.
- ❖ *Engage practitioners with demonstrated, large-scale implementation experience.* The framework revision process should include organizations with long-term records of civic education implementation across diverse student populations. The Center for Civic Education stands ready to contribute to this process in whatever capacity is most useful to the Board.

## **Conclusion**

As the organization that directed the development of the original NAEP Civics Framework and authored the *National Standards for Civics and Government*, the Center for Civic Education strongly supports updating the framework to reflect contemporary civic realities while preserving the enduring constitutional foundations that have guided civic education for three decades.

The upcoming revision presents an important opportunity to reaffirm a shared national commitment: ensuring that every student acquires the civic knowledge, skills, and dispositions necessary to sustain our constitutional democracy. The health of self-government depends in part on whether young people are educated, and very importantly, assessed against a rigorous, relevant, and inspiring vision of what citizenship requires. We look forward to supporting the Board's work throughout this multi-year process and would welcome continued engagement at every stage.

Respectfully submitted,

**Center for Civic Education** - [civiced.org](http://civiced.org)

**From:** [Erin Valdez](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Friday, March 27, 2026 4:20:39 PM  
**Attachments:** [image.png](#)

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Lesley Muldoon, Executive Director  
National Assessment Governing Board  
U.S. Department of Education  
400 Maryland Ave. SW  
Washington, DC 20202

Dear Executive Director Muldoon,

The Cicero Institute appreciates the opportunity to comment on the NAEP Civics Assessment Framework. We endorse the comments submitted by Defending Education on this matter and wish to highlight the critical state-level need for a robust nationwide measurement of civic literacy.

### **Does the NAEP Civics Assessment Framework need to be updated?**

Yes. The current framework is overdue for revision. The 2022 NAEP Civics Assessment found that only 22 percent of eighth-graders scored at or above the Proficient level, and nearly a third scored Below Basic. These results reflect a systemic failure in civic education that the assessment framework itself should help to diagnose and correct.

### **Why is a revision needed?**

The Cicero Institute has engaged extensively in civics education reform at the state level, with a particular focus on ensuring that K-12 students understand the foundational principles of the American republic and the historical record of communist and socialist regimes.

Fewer than one in five Americans under age 45 can pass a multiple-choice version of the U.S. citizenship test. Additionally, American schools broadly fail to educate students on the atrocities committed by communist governments in the 20th century. Fewer than half of Americans have heard of the Khmer Rouge's killing fields, and only about a quarter are aware of the Holodomor. At the same time, civic literacy has sharply declined among younger generations. As a consequence, a significant share of younger Americans hold favorable views of communism, and a troubling number believe the Communist Manifesto

better guarantees freedom and equality than the Declaration of Independence.

This ignorance is a direct product of inadequate civics and history instruction, and the NAEP framework should be revised to ensure it can measure whether students understand not only how American constitutional government works, but also how it contrasts with the collectivist ideologies that caused the deaths of tens of millions in the last century. A framework that fails to assess this knowledge leaves a dangerous gap in our understanding of what students know.

We also echo Defending Education's concern that the framework's emphasis on "participatory skills" and "action civics" puts the cart before the horse. Civic knowledge must precede civic action. The revised framework should focus squarely on measuring students' understanding of the Constitution, the principles of republican self-government, and the nation's foundational documents—not on assessing activist dispositions.

As Defending Education recommends, the NAGB should consult rigorous, content-rich standards such as the Hillsdale College K-12 History & Civics Curriculum and the Civics Alliance's American Birthright standards, as well as strong state-level models from Louisiana, Florida, and Tennessee. The NAGB should also avoid contracting with organizations that have embedded politicized frameworks like DEI and Critical Race Theory into their social studies work.

### **What should a revision to the framework include?**

We wish to emphasize one structural reform: the NAGB should increase the NAEP Civics sample size to enable state-by-state reporting of results.

State-level comparability data is essential to guide ongoing state educational reforms and signal the need for action in states that have not yet addressed the civic illiteracy crisis. Currently, the NAEP Civics Assessment is administered only at the national level at grade 8, with a sample too small to produce state-level scores. This means that policymakers, parents, and the public have no way to assess the impact of state-level reforms on relative student performance over time or across state lines.

This matters enormously because civics education policy is made at the state level. States are adopting new civics standards, requiring civics exams for graduation, and mandating instruction on topics including the history of communism. The Cicero Institute has supported several of these efforts, including the landmark legislation enacted by Texas in 2025, SB24. This legislation established a robust social studies curriculum requirement covering historically significant communist regimes, ideological underpinnings, and cultural movements in Texas public schools. State-level reporting would provide much-needed transparency to identify best practices, reward excellence, and motivate improvement

where it is most needed.

We also support adding the NAEP Civics Assessment to the biennial testing cycle alongside reading and mathematics, and we agree that test items should focus on fundamental constitutional knowledge rather than tangential material that inflates scores and obscures the depth of civic illiteracy.

The 250th anniversary of the Declaration of Independence is a fitting moment to recommit to the civic education that the American republic requires. We urge the NAGB to seize this opportunity.

Sincerely,

**Erin Davis Valdez**  
EDUCATION AND WORKFORCE POLICY DIRECTOR  
[2112 Rio Grande St., Austin, TX 78705](#)

 **CICERO INSTITUTE**



March 25, 2026

Lesley Muldoon, Executive Director  
National Assessment Governing Board  
U.S. Department of Education  
400 Maryland Ave. SW  
Washington, DC 20202  
Mailstop: 1A112D

Dear Executive Director Muldoon,

Thank you for the opportunity to comment on the Civics Assessment Framework for the National Assessment of Educational Progress (NAEP).

The National Assessment Governing Board (NAGB) asked respondents to address three specific questions:

- Does the NAEP Civics Assessment Framework need to be updated?
- If the framework needs to be updated, why is a revision needed?
- What should a revision to the framework include?

### **Does the NAEP Civics Assessment Framework need to be updated?**

Defending Education urges the National Assessment Governing Board to update the 2018 Civics Assessment Framework. All participants should possess relevant technical and subject area expertise necessary to complete this critical work. Moreover, they should pledge to conduct the revision in good faith, pledging to deliver a final product that is free of political bias and divisive ideologies. To this end, we recommend that the NAGB reject consultants and reviewers from organizations that openly support identity politics and diversity, equity, and inclusion (DEI) initiatives, such as the American Institutes for Research.

As part of this work, we would encourage the NAGB to consult states, organizations, and institutions of higher education that have produced comprehensive, rigorous, and relevant civics standards. These include the [Hillsdale College K-12 History & Civics Curriculum](#) and [American Birthright: The Civics Alliance's Model K-12 Social Studies Standards](#). In addition, [Foundations of Freedom: A Louisiana Civics Program](#), the [Florida Civics Literacy Excellence Initiative](#), and the [Tennessee Academic Standards for Social Studies](#) are state-level civic education models worthy of consideration by the revision committee.

## If the framework needs to be updated, why is a revision needed?

Civics education has been a core function of American schooling since the Founding Era. Political leaders throughout the colonies may have had many disagreements about the nature of the American experiment, but they almost universally agreed that an educated populace is essential to a thriving republic.

Yet, multiple [political](#) and [social](#) measures suggest that civic literacy and engagement in the United States began to decline in the latter half of the twentieth century and remains at alarmingly low levels today. State-administered tests, the NAEP Civics Assessment, and countless independent studies reflect this disheartening decline. For example:

- Only **22%** of eighth-graders performed at or above the **NAEP Proficient** level on the [2022 NAEP Civics Assessment](#), and a shocking **31%** of students scored **Below Basic**.
- According to a [2024 American Council of Trustees and Alumni \(ACTA\) study](#), 60% of undergraduate respondents could not correctly identify the term lengths of members of the U.S. House of Representatives and the U.S. Senate. Only 28% of students correctly identified the 13th Amendment as the government action that freed the slaves.
- In a [2024 U.S. Chamber of Commerce Foundation](#) survey of registered voters, 70% failed a basic civic literacy quiz on topics like the three branches of government, the number of Supreme Court justices, and other basic functions of our democracy.

These outcomes reflect a systematic failure starting in the elementary school grades and persisting into adulthood. Civics education at the typical public school is fragmented, knowledge-poor, and too often saturated with biased content. Various forms of higher education and both formal and informal forms of adult learning do not compensate for the shortcomings produced by inferior civics instruction in K-12 public schools.

Yet, we believe that revising the NAEP Civics Assessment Framework could be the first step toward ushering in an era of civic renewal. Americans will celebrate the 250<sup>th</sup> anniversary of the Declaration of Independence this year, and the Semiquincentennial is an ideal time for the nation to recommit to providing a high-quality civic education for all Americans.

## What should a revision to the framework include?

The NAEP Civics Assessment should focus entirely on measuring what students know about the foundations of the American political system, the United States Constitution, and the fundamental principles and ideas that underlie our republican form of government. Additional questions related to foreign affairs should be included, insofar as they assess students' understanding of the constitutional mandates dictating the proper use of state power in such

contexts, including treaties, international commerce, declarations of war, and the appointment of ambassadors.

Accordingly, the revised NAEP Civics Assessment Framework should eliminate questions that focus on “participatory skills,” also known as “action civics.” On the surface, the participatory skills component is a well-intentioned effort to encourage children and young adults to exercise their constitutional rights in the public sphere responsibly. Yet, this aspect of the framework puts the proverbial cart before the horse.

Civic knowledge necessarily precedes “questioning,” “discussing public affairs,” “using media resources,” “deliberating on public issues,” “assessing others’ arguments and positions,” and other participatory skills identified in the current framework. Encouraging civic participation without an adequate understanding of American political institutions produces little more than public displays of self-assured ignorance. One need not look further than much of the political discourse on social media or an anti-ICE walkout to see this phenomenon occur in real time.

In addition, the NAEP Civics framework’s stated focus on employing “authentic stimulus materials” produces pedantic distractions that are counterproductive to the task of authentically measuring civic knowledge. There is no need for test items to feature an “exciting array of materials,” such as newspaper articles, hypothetical cases, sample ballots, real-world scenarios, or song lyrics. Obviously, younger generations and middle-aged standardized testing writers seldom agree on what constitutes “exciting” fodder for a test question, a disconnect that creates more problems than it solves.

Rather than undertaking the fool’s errand to make test questions ostensibly resonate with children and young adults, testing writers should simply draw on the nation’s rich and enduring corpus of primary text documents, consequential speeches, U.S. Supreme Court decisions, and other items of historical or national significance. Surely, real-world scenarios and song lyrics are mediocre substitutes for the majesty of Abraham Lincoln’s “Gettysburg Address” and Martin Luther King Jr.’s “I Have Dream” speech.

## **Other Considerations**

1. *Add the NAEP Civics Assessment to the biennial testing cycle that currently is limited to reading and mathematics*

Accountability is not an end in itself. It is a means to both recognize excellence and propel meaningful reform. Yet, the infrequent administration of the civics assessment allows the dismal NAEP Civics results to fade from the public consciousness without consequence. Increasing the frequency of test administration will increase the likelihood that policymakers and education officials address shortcomings in civic education in their own states.

## *2. Increase the sample to allow for state-level results*

Although not ideal, researchers can derive state-level estimates of NAEP Civics performance using statistical techniques such as [multilevel regression with poststratification](#). A better approach would be to administer the NAEP Civics Assessment to representative student samples in each state.

Representative samples for future civics assessments should be large enough to generate statistically valid scores for each state. State-level scores would allow policymakers to identify and address strengths and shortcomings in social studies standards, curricula, instruction, and assessments. This is particularly valuable for the many states that do not administer statewide civics assessments as part of their testing programs.

## *3. Questions on future NAEP Civics tests should focus on fundamental concepts and not tangential matters.*

According to the [NAEP Questions Tool](#), the 2022 NAEP Civics test asked 8<sup>th</sup>-grade test takers to identify careers in public service, evaluate the usefulness of web page searches on citizenship, and identify the central purpose of the organization Vote Smart. At best, low-stakes questions like these provide little insight into what students know about American political institutions. At worst, these “softball” questions inflate otherwise dreadful test scores and mask the depth of test-takers’ civic illiteracy.

## **Conclusion**

The NAEP Civics Assessment is a necessary, often sobering snapshot of public school students’ understanding of our fundamental constitutional rights and their readiness to exercise those rights as responsible and informed citizens. As long as civic education remains a core function of public education, the NAEP Civics Assessment will remain a critical tool for ensuring that our public schools are fulfilling their responsibilities.

We applaud the National Assessment Governing Board for soliciting public comment on this critical issue, and we look forward to a NAEP Civics Assessment Framework that improves upon the 2018 edition.

Sincerely,

Nicole Neily  
President  
Defending Education



To: National Assessment Governing Board, U.S. Department of Education

From: The Democratic Knowledge Project-Learn, Harvard University

Re: NAEP Civics Framework

March 23, 2026

**The Democratic Knowledge Project–Learn (DKP–Learn)** is a preK–16 civic education research lab based at Harvard University’s Graduate School of Education, part of the **Democracy Renovation Ecosystem** founded and led by Danielle Allen. DKP–Learn pursues a future where a supermajority of young people consider a healthy constitutional democracy essential to their well-being, feel a sense of belonging to America’s pluralistic community, and feel confident that they have the knowledge, skills, and civic dispositions and virtues needed for civic life. We identify, strengthen, and disseminate the knowledge, skills, and civic dispositions needed to sustain healthy democratic life. Through ruthlessly collaborative partnerships, we deliver:

- **Research** on civic learning across preK–12, higher education, and young working adults through our DKP–Learn Lab
- **EAD-aligned curriculum, resources, and assessment tools**, including a year-long Grade 8 civics curriculum and a national portfolio of EAD pilot implementation programs
- **K–12 educator professional development** through the Civic Learning Institute at HGSE
- **Higher education professional development** through the Pluralism Institute at HGSE
- **Field leadership** through the Council on Civic Strength toward a shared universal civic learning strategy, at Harvard and beyond

We write to provide a response to the request for Initial Public Comment ([/www.federalregister.gov/d/2026-02980](https://www.federalregister.gov/d/2026-02980)) with answers to the following three questions:

- Does the NAEP Civics Assessment Framework need to be updated?
- If the framework needs to be updated, why is a revision needed?
- What should a revision to the framework include?

We do believe that the NAEP Civics Assessment Framework should be updated.

There are three reasons this update is needed: (1) the field of civic learning has changed dramatically even since the 1998 framework for the NAEP Civics Assessment was written, with advances since then in the academic knowledge base supporting civic learning with regard both to core content knowledge and pedagogy; (2) the field of assessment has changed dramatically with improved capacity to deliver competency-based assessment; and (3) a civic learning



renaissance is underway that could be amplified and reinforced with a more effective NAEP Civics Assessment.

### **Changes in the Field of Civic Learning:**

The fields of political science, law, and history have all built substantial new knowledge in the last fifty years on subjects ranging from the rise of the administrative state as something akin to the fourth branch of government, social movements and American institutional transformation, and slavery and Reconstruction, among other areas. Research work on civic learning has developed a strong foundation for the view that the best civic learning is achieved when knowledge, skills, and civic dispositions are developed in concert. The Educating for American Democracy Roadmap incorporates this state-of-the-art research base into a framework for civic learning that integrates knowledge, skills, and dispositions. The NAEP Civics Assessment would ideally incorporate this new knowledge and reinforce this holistic approach to civic learning with EAD's broadly endorsed contemporary conception of these areas of civic learning.

**Changes in the Field of Assessment:** As we are sure the NAEP team knows well, the field of assessment has developed significantly in recent years in the direction of more authentic assessments. The NAEP exam addresses knowledge, skills, and dispositions. We think the first two are particularly important in a national exam, while the last might be better left to the states, in order to support a pluralism of views about how to approach civic dispositions. While NAEP has historically made inferences about skills from knowledge about skills, more interactive methods for testing are now available, as in the Digital Inquiry Group's work on information literacy assessment and the work of Jane Lo on case-based reasoning. While the civic learning field still needs to do more work on how best to assess civic skills, a NAEP Task Force on this subject to draw on new methodologies to inform a revision would be valuable.

**Civic Learning Momentum:** A renaissance in civic learning is underway. Thanks to the work of national coalitions like CivXNow and Educating for American Democracy, **28 states** have policy aligned to the EAD Roadmap; schools and community partners in **39 states** are running EAD-aligned pilots. On a conservative count, **thousands of teachers and hundreds of thousands of students** engaged in EAD-aligned civic learning. In our own work at the DKP, we are reaching **100,000 students in MA** with EAD aligned curriculum and pedagogy through collaboration with the Civics and History Inquiry Partnership (CHIP). For the DKP's yearlong Grade 8 civics curriculum, we have developed validated measures of knowledge, skills, and dispositions. A new NAEP could continue to propel the momentum in the civic learning renaissance by providing a data foundation for research and continued improvement.

We would recommend five areas of focus for the framework revision process:

- (1) **Adoption of the Educating for American Democracy Roadmap as a framework for supporting the knowledge assessment.** This would support a shift from assessing knowledge about static institutions to assessing the philosophical foundations of democracy, the principles of institutional design, and the dynamics of institutional



evolution over time, as well as core democratic challenges such as compromise, developing a plural yet shared sense of identity, and reflective patriotism.

- (2) **Movement toward competency based assessment.** We would recommend drawing on innovations in assessment methodology to achieve more authentic assessments, using interactive testing methodologies. Ideally, NAEP would establish a Working Group on the Assessment of Civic Skills to advance this innovation.
- (3) **Tests with a meaningful definition of proficiency and that are comparable over time.** We would recommend that relationships be tested between knowledge items and actual civic participation, in order to achieve stronger indicators of real civic readiness. This could address the current challenge of the definition of proficiency being arbitrary. We would also recommend, conducting bridge studies would help to clarify the meaning of changes in NAEP civics performance over time. These two revisions of approach would significantly increase the value of NAEP to research endeavors needed to strengthen civic learning.
- (4) **Increase the number of test takers in order to provide state level data.** Because of new momentum for civic learning at the state level, states are making good forward progress on developing their own assessment instruments. Massachusetts, for instance, now has a Massachusetts Comprehensive Assessment System (MCAS) exam for civics. To strengthen the infrastructure of civic learning, states would ideally be able to evaluate the relation between their assessment and NAEP results. This, however, requires that state-level NAEP results be reported.

We appreciate that NAEP offers a cohort-based model for civic learning assessment. A high quality assessment that incorporates the state-of-the-art understanding of content and pedagogy, is validated to track civic readiness, is comparable across time, and provides state-level data would provide the civic learning field with the foundation needed for a true renaissance in civic learning.

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

**From:** [Liz Evans](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Friday, March 27, 2026 9:27:29 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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*The Roadmap to Educating for American Democracy* (2021) is a framework for excellence in civic and history education for all learners. Supported by the National Endowment for the Humanities and the U.S. Department of Education under two administrations of different parties, the EAD *Roadmap* reflects the work of hundreds of ideologically, philosophically, and professionally diverse historians, political scientists, and educators.

The [report](#) that accompanies the *Roadmap* states, “The Federal Government should ... revise the NAEP frameworks for civics and U.S. history (which were written in the 1980s) to align with EAD; deploy the tests in all three NAEP grades (4, 8, 12); and provide state-level as well as national data every two years” (p. 23).

In response to the request for Initial Public Comment ([www.federalregister.gov/d/2026-02980](http://www.federalregister.gov/d/2026-02980)), the Steering Committee of EAD now formally submits this recommendation to update the NAEP frameworks for Civics and History. We briefly address the three questions in the Request:

Does the NAEP Civics Assessment Framework need to be updated?

Yes. Our extensive, philosophically pluralist, and deliberative process (involving more than 300 people) reflected a consensus that the NAEP civics standards require updating. This was the basis for our product, the new Roadmap.

- If the framework needs to be updated, why is a revision needed?

First, the current 1980s framework fails to reflect changes in society during the succeeding forty years as well as extensive scholarship by historians, political scientists, legal scholars, and others. For example, the current Framework was written before the Internet had been launched. Considerable scholarship over these decades has greatly expanded (and continues to expand) our understanding of topics commonly included in US History and Civics instruction. The NAEP framework should be updated.

Second, state standards and popular curricula and textbooks have evolved, albeit inconsistently, which means that gaps have widened between the NAEP framework and what large numbers of students are expected to learn.

Third, the EAD *Roadmap* envisions a more ambitious education in history and civics, one that can inspire students to want to become involved in their constitutional democracy and help to sustain our republic; that tells a full and complete narrative of America’s plural, yet

shared story; that analyzes and celebrates the compromises needed to make our constitutional democracy work; that cultivates civic honesty and reflective patriotism that leaves space to both love and critique this country; and that teaches both history and civics through a timeline of events and themes that run through those events. The existing NAEP Frameworks do not reflect these goals.

- What should a revision to the framework include?

In short, the EAD Roadmap provides detailed guidance about content in both history and civics, by grade band. It reflects extensive input from educators and leaders who know what is currently taught. It can therefore guide a revision of the Framework.

Thank you,

### **The Educating for American Democracy (EAD) Steering Committee**

Danielle Allen, Harvard University  
David Bobb, Bill of Rights Institute  
Shannon Salter Burghardt, teacher at Allentown Schools  
Louise Dube, iCivics  
Liz Evans; Arizona State University  
Chester Finn, Thomas B. Fordham Institute  
Jane Kamensky, Monticello  
Joseph Kahne, University of California Riverside  
Peter Levine, Tufts University  
Beth Ratway, American Institutes for Research

[Liz Evans, NBCT, PMP](#)

**Program Director for Civic Education and Outreach**  
Center for American Civics  
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**Chair, Educating for American Democracy Steering Committee**

**Director of Civic Learning & Educator Engagement**  
Arizona Civics Coalition  
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**From:** [Keahe Davis](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Monday, March 23, 2026 6:23:35 PM

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Dear Members of the National Assessment Governing Board:

We write in support of updating the NAEP Civics Framework, and we answer the Governing Board's three questions directly: Yes, the framework should be updated. It should be updated because the civic environment students navigate today has changed fundamentally since the 1990s, while the framework has not. A revision should preserve the conceptual core that has made the framework valuable (its grounding in civic knowledge, participatory skills, and civic dispositions) while expanding what it measures to reflect what civic competence genuinely requires in 2026. The National Assessment of Educational Progress is more than a measurement instrument. It signals to states, districts, school leaders, teachers, and the public what civic learning means and what it is worth. That signal should be accurate.

This comment draws on three bodies of evidence: findings from the Commission to Promote and Advance Civic Education (PACE) in Hawai'i (February 2025), Carnegie Corporation of New York's report on connecting civic education and a healthy democracy (March 2024), and CivicPulse's nationally representative survey of local government officials on polarization and civic participation (December 2025). Together, these sources underscore both the urgency of updating the framework and the substance it should reflect.

The Commission to Promote and Advance Civic Education (PACE) was established by the Hawai'i Supreme Court in 2021 to strengthen civic learning across the state. Our 2025 survey of educators in Hawai'i's public and independent schools, conducted in partnership with the Hawai'i State Department of Education and the Hawai'i Association of Independent Schools, reached more than 600 teachers and 168 administrators. What we heard consistently was that civics is underprioritized, underresourced, and often displaced by pressure to teach tested subjects. Fifty-six percent of teachers cited competing content demands as the primary obstacle to meaningful civics instruction. Nearly half reported insufficient access to high-quality civics materials, with the gap most acute in elementary grades. Teachers across grade levels identified media literacy,

pedagogical training, and student engagement strategies as the professional development they most need, not simply more content knowledge. These findings are not unique to Hawai'i, but they carry particular weight here. Hawai'i's students bring a rich and complex civic inheritance: a state shaped by indigenous traditions, multiethnic communities, and a history that demands honest civic reckoning. An assessment framework that measures only what students can recall about federal government structure cannot capture whether students in Hawai'i, or anywhere, are developing the civic capacity their communities and their democracy will need from them.

## I. The Case for Updating the Framework Is Compelling and Well-Documented

The Carnegie Corporation's 2024 report notes that eighth graders' scores on the NAEP Civics assessment registered their first decline since testing began in 1998, according to the 2023 results. More recent data offers some encouragement: the 2025 Annenberg Constitution Day Civics Survey found an increase in basic civics knowledge, with 70 percent of Americans now able to name all three branches of government. Yet even with those gains, 13 percent of Americans still cannot name any branch, and large portions of the public remain unable to name foundational First Amendment rights. Progress and persistent gaps coexist, and that combination makes the case for a more rigorous and current assessment framework, not a weaker one.

Yet the problem is not simply that students know less. It is that the existing framework has not kept pace with what civic competence requires in a polarized, information-saturated, and rapidly changing democracy. A survey of local government officials conducted by CivicPulse in September 2025 found that 89 percent of local officeholders perceive substantial negative effects of polarization at the national level, the highest rate recorded across three surveys spanning 2024–2025. At the same time, these same officials overwhelmingly identified K–12 schools as the most important civic institution in their communities, with 83 percent saying schools foster civic participation. Schools, and the assessments that shape them, carry enormous weight.

The PACE Commission's 2025 survey of educators in Hawai'i reinforces the national picture. Teachers and administrators consistently reported that civics is underresourced, undertaught, and insufficiently prioritized, with 56 percent of teachers citing excessive pressure to teach other content as the primary obstacle. A 25-year-old framework does nothing to contest the message that civics is a secondary concern. Updating the framework is an opportunity to change that signal.

## II. What an Updated Framework Should Reflect

We offer the following substantive recommendations for the content and emphasis of an updated framework, grounded in the evidence cited above and in the broader field of civic education research.

#### A. Maintain and Deepen Constitutional and Institutional Foundations

The existing framework's emphasis on constitutional principles, the structure of government, and the rights and responsibilities of citizenship remains essential and should be preserved. Even the encouraging gains in the 2025 Annenberg Constitution Day Civics Survey underscore how much work remains: while freedom of speech was named by nearly four in five Americans, only about half (48 percent) named freedom of religion and just over a third (34 percent) named freedom of the press. Knowledge of the right to petition stood at 12 percent. An updated framework must continue to assess whether students understand how American government is structured, how laws are made, how rights are defined and contested, and how democratic institutions function. This is not knowledge for its own sake; it is the prerequisite for meaningful civic agency.

#### B. Expand the Framework to Assess Civic Inquiry, Analysis, and Reasoning

The most significant limitation of the 1998 framework is its relative emphasis on declarative knowledge over the skills of civic reasoning. An assessment that asks only what students know about government, without probing how they analyze competing claims, interpret primary sources, evaluate evidence, or reason through contested civic questions, does not capture what civically competent students can do. The Educating for American Democracy roadmap, developed by a cross-ideological coalition including iCivics, Harvard, Arizona State, and Tufts universities, identifies inquiry and analysis as central to robust civic learning. The NAEP framework should follow suit.

Practically, this means including assessment tasks that ask students to reason from evidence, to weigh competing perspectives on civic questions, to identify logical fallacies or manipulative rhetoric in public discourse, and to construct well-reasoned arguments about civic issues. These competencies are both assessable and essential.

#### C. Integrate Media Literacy as a Core Civic Skill

The PACE Commission survey found that 51 percent of administrators and 42 percent of teachers in Hawai'i identified media and news literacy as a professional development priority for civic education. The Carnegie report describes misinformation and disinformation as central threats to democratic functioning. It notes that iCivics, the nation's largest nonprofit provider of civics resources, has made digital literacy a core programmatic focus precisely because navigating an online information environment is now inseparable from civic life.

The ability to navigate information is now inseparable from civic participation. Students who cannot evaluate the credibility of a source, recognize manipulation in digital content, or distinguish fact from opinion are poorly equipped to engage in public life regardless of how well they understand constitutional structure. An updated NAEP framework should treat these skills as core components of civic competence, not supplementary additions. Assessing them is not a politically charged proposition; it is a recognition of what civic readiness actually requires in the world students already inhabit.

#### D. Assess Civil Discourse and the Skills of Democratic Participation

When local government officials across the country were asked what they wanted young people to gain from civics programming, the CivicPulse survey found overwhelming enthusiasm for experiential and participatory activities: attending a local government meeting (87 percent positive rating), youth volunteering in elections (80 percent), and youth representation in local governance (80 percent). These officials understand that civic competence is not only about knowing how government works; it is about being able to engage constructively with others across lines of difference.

Peter Levine of Tufts University, a coauthor of the landmark Civic Mission of Schools report, put it directly in the Carnegie report: in good civics classes, students are able to discuss contested questions in ways that promote learning and dialogue. The NAEP framework should include a domain that addresses civic discourse, encompassing students' ability to engage with perspectives different from their own, to articulate reasoned disagreement respectfully, and to participate in structured deliberation. These skills are fully assessable through well-designed constructed-response and scenario-based items.

#### E. Reflect the Application of Civic Learning in Real-World Contexts

Both the PACE Commission and the CivicPulse data underscore the importance of experiential learning, specifically connecting students to real civic processes, community issues, and local institutions, as a cornerstone of effective civics pedagogy. The PACE report describes excellent civics education as one that takes students beyond the traditional classroom into community-based, multigenerational learning experiences that reinforce their role as stewards of democracy. While NAEP cannot assess participation directly, it can assess students' civic knowledge and skills in applied contexts: scenarios that present real civic problems, require students to apply constitutional principles, weigh competing civic values, and propose or evaluate civic action.

Assessment items grounded in authentic civic contexts (a local zoning debate, a

contested ballot measure, a community response to a public health decision) would test not just what students know but whether they can transfer that knowledge to situations that look like actual civic life. This approach would better capture the civic readiness that educators, researchers, and local leaders consistently identify as the ultimate goal.

#### F. Ensure the Framework Reflects the Full Range of American Civic Experience

The CivXNow Coalition's state policy menu, as reported in the Carnegie report, explicitly calls for disaggregating civics assessment and accountability data to address disparate outcomes across student populations. The PACE Commission's report is especially attentive to how Hawai'i's history of forced assimilation in civic education erased local histories and silenced indigenous voices, leaving many students disconnected from their civic identities. The Commission calls for civics education that is culturally reflective and place-based, ensuring that all students, regardless of background, understand that their voices can shape their communities.

An updated NAEP framework should reflect the breadth of American civic life and identity. This does not mean abandoning constitutional foundations; it means ensuring that the framework asks whether students understand how different communities have engaged with and shaped American democracy, and whether students of all backgrounds see themselves as legitimate civic actors. As Tomas Varela of the New Jersey Black Empowerment Coalition described in the Carnegie report, true civic education requires that all communities have a seat at the table.

### III. How the Assessment Methodology Should Evolve

An updated framework is a necessary but not sufficient condition for a stronger NAEP Civics assessment. The Governing Board should also examine the assessment's methodology to ensure that its item types and formats can capture the full range of civic competencies the framework will describe. We offer four specific methodological recommendations.

- Expand constructed-response items. Multiple-choice items can efficiently assess declarative knowledge, but they are poorly suited to measuring civic reasoning, argumentation, or the ability to evaluate competing perspectives. An updated assessment should include a meaningful proportion of tasks that require students to construct written responses: analyzing a civic document, evaluating competing claims about a policy question, or explaining the constitutional basis for a civic dispute.
- Use scenario-based and document-based tasks. Items grounded in real or

realistic civic contexts (primary source documents, competing editorials, simulated public hearings) can assess how students apply civic knowledge, not just whether they have memorized it. These approaches align with the inquiry-based pedagogies that the Educating for American Democracy roadmap and state policy leaders increasingly identify as best practice.

- Disaggregate and report results by student population. The Governing Board should commit to disaggregating NAEP Civics results by race, ethnicity, socioeconomic status, geography, and English learner status in ways that make disparities in civic learning visible and actionable for policymakers. The assessment should serve not only as a measure of aggregate civic knowledge but as a tool for identifying where civic education investment is most urgently needed.

- Restore assessment at grades 4 and 12. The current NAEP Civics assessment is administered only at grade 8, leaving the Board, states, and the public without national data on how civic knowledge develops at the beginning or the end of the K–12 span. Restoring assessment at grade 4 would establish a baseline for how civic learning begins and where foundational gaps emerge early. Restoring assessment at grade 12 would provide the most consequential data point of all: what students know and can do as they approach voting age and enter civic life as adults. A single grade-8 snapshot is insufficient to understand how civic learning develops, where it breaks down, or how instructional investments across the K–12 years pay off. The Governing Board should treat the restoration of multi-grade assessment as a priority alongside any framework revision.

#### IV. The Broader Stakes: What NAEP Signals to the Nation

The PACE Commission opens its 2025 report with a reminder that civics education is often treated as a lower priority than math and language arts, reinforcing the perception that understanding government and participating in civic life is less important. This is, in part, a signaling problem. When the most visible national assessment of student learning treats civics as narrowly about government facts, it tells teachers that covering procedures and structures is sufficient. It tells administrators that the pedagogical investment required for discussion, inquiry, debate, and community engagement is not worth prioritizing if it will not appear on the “Nation’s Report Card.”

The CivicPulse survey data offers a striking counterpoint to this signal: 87 percent of local government officials believe that attending a local government meeting would have a positive impact on civic participation among youth. The gap between what local civic leaders understand about civic development and what a 1998-era assessment

framework measures is not a small one. NAEP has the power to close that gap, not by dictating curriculum, but by more accurately describing what civic competence looks like.

Carnegie Corporation's work on the CivXNow Coalition demonstrates that there is broad, bipartisan consensus in this country that civic education matters, with 77 percent of Republicans and 84 percent of Democrats in a 2022 survey agreeing that teaching civics is important. The Governing Board has an opportunity to translate that consensus into a framework that sends the right signal: that civic competence is complex, that it requires knowledge and skill and the disposition to engage, and that the Nation's Report Card will measure it accordingly.

## V. Conclusion and Summary of Recommendations

We respectfully urge the National Assessment Governing Board to move forward with updating the NAEP Civics Framework and to ground that update in the following principles:

- Preserve and deepen assessment of constitutional knowledge, governmental structure, and civic rights and responsibilities.
- Expand the framework to explicitly assess civic inquiry, analysis, reasoning, and argumentation.
- Add media literacy as a core civic competency domain.
- Include civil discourse and deliberative skills as assessable dimensions of civic competence.
- Situate assessment tasks in authentic civic contexts that require students to apply, not merely recall, civic knowledge.
- Ensure the framework reflects varied civic identities and the full breadth of American civic experience.
- Update item formats to include scenario-based and constructed-response tasks that can measure higher-order civic reasoning, and disaggregate results to make achievement gaps visible and actionable.
- Restore NAEP Civics assessment at grades 4 and 12 to provide a complete picture of civic learning across the K–12 span.

The health of American democracy depends, in part, on whether its young people are prepared for the demands of self-governance. NAEP Civics is not the only instrument for measuring that preparation, but it is among the most consequential. We encourage the Governing Board to use this moment to bring the framework into alignment with what we

now know about civic learning, civic competence, and the conditions under which democracy can thrive.

As a commission established by Hawai'i's highest court to advance civic education across our state, PACE has a direct stake in what this framework becomes. The educators and administrators we surveyed are doing serious work under difficult conditions. They deserve an assessment framework that takes their work seriously in return: one that reflects the full scope of civic learning, sends the right signal about what counts, and gives states and communities the information they need to invest wisely. We are committed to supporting the framework revision process and welcome the opportunity to contribute Hawai'i's experience and perspective as that work moves forward.

Respectfully submitted,

Hawai'i Commission to Promote and Advance Civic Education (PACE)

March 25, 2026

To the National Assessment Governing Board:

On behalf of iCivics, it is my pleasure to share the following public comment on the NAEP Civics Assessment Framework. At iCivics, we believe in regular, rigorous instruction in and assessment of civic learning. We are delighted that the Board has renewed its commitment to our Nation's Civic Report Card, thereby signaling the importance of civic learning for the strength and sustenance of our constitutional democracy.

First and foremost, it is our enthusiastic position that the NAEP Civics Assessment Framework needs to be updated. We hold this view for two reasons: (1) our Nation's Civic Report Card must reflect the needs of American democracy *today*, and (2) the assessment must have a positive and stronger influence over state policies and investments in civic learning.

On the first point, while many of the knowledge, skills, and dispositions required for informed civic participation have remained the same since the Framework was designed decades ago, technological innovations and sociopolitical shifts require that we update and reprioritize the civic capacities we seek to cultivate. For example, 30 years ago, Americans did not need to understand the ways in which artificial intelligence could be used to mislead voters (Knowledge), how to detect the veracity of almost every piece of political media they consume (Skills), or even care if the information they consume and share is accurate (Dispositions). Today, those capacities are critical, and neglecting them would pose an existential threat to our form of government.

On the second point, various implementation and reporting decisions have, we believe, limited the influence of the Nation's Civic Report Card. These include administering the exam in fourth grade, a time when most states are not teaching the content students will encounter; only providing nationally-aggregated data, thereby diminishing the ability of state-level actors to evaluate how student performance is more or less related to practices within their respective state; and not providing full insights into the cut score.

We therefore believe that any revision should require that the exam be administered in the fifth, eighth, and twelfth grades, that results be reported at the state level, and that clearer definitions be provided for what the basic and proficient levels of knowledge mean in terms of conceptual understanding. Using the three branches of government as an example, a student's depth of knowledge needs to level up from the basic level fact that there are three branches and what they are and do. The proficient level would require that a student understand how the branches interact and relate to how tensions between the branches have shifted over time, and what caused those shifts. It's a lot to measure in a single assessment, but knowing where the student falls on the depth-of-knowledge continuum is key to understanding their proficiency.

We believe a revised NAEP Civics Assessment Framework must shift from simply studying institutions to a dynamic understanding of how a "more perfect union" is built and sustained.

- The Framework should embrace the Educating for American Democracy (EAD) Roadmap as the standard-bearer for achieving excellence in civic education in support of civic strength. By anchoring its content and approach in the Roadmap's Design Challenges, the NAEP Civics Assessment Framework will inspire learning opportunities that enable young people to navigate the foundational tensions at the core of the American experiment, thereby cultivating in students an ethos of reflective patriotism and motivating them to take responsibility for self-government.
- The Framework should move away from testing isolated facts and toward assessing conceptual understanding.
- The Framework should replace words such as "conflicts" and "disparities" with "tensions" to acknowledge that progress in our constitutional democracy often involves navigating competing, valid values. As the EAD Roadmap exemplifies, these tensions are intentional features of the American experiment to be acknowledged and deliberated around, not disparaged.
- The Framework should seek to balance the study of established institutions with the active goal of empowering students to contribute to an evolving democracy.



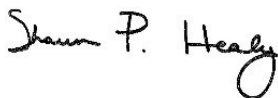
- The Framework should strive to reflect the evolving demographic composition of our nation’s K-12 student population so that all students can see themselves and feel proud of our history and progress. The Board should ask, as Design Challenge 2 of the EAD Roadmap inquires, “How can we integrate the perspectives of Americans from all different backgrounds when narrating a history of the United States,” in hopes that “this more plural and therefore more accurate story of our history and foundations may also be a common story, the shared inheritance of all Americans?”
- The Framework should move beyond an individualistic frame of participation toward community service and collaborative problem-solving. The span of options for informed participation should include not just following the news, voting, and contacting public officials, but also, for example, working with a faith-based youth group or a school-based affinity club to advance a cause that students consider important.
- More specifically, the Framework should include the following:
  - **Foundations and Origins:** Sustained focus on Intellectual origins (e.g., Locke) and the inspiration for/formation of a self-governing society; the Declaration of Independence, American values, and their evolving meanings; and founding tensions through the analysis of the *Federalist Papers* and the debates that shaped the early republic.
  - **Institutional Evolution:** Nuanced analysis of not just the text of the Constitution and the Bill of Rights, but how rights and responsibilities are interpreted by courts and applied in the real world; how voting, the rule of law, and the three branches have shifted in power and function over time; how wars and expansion have expanded and changed the nation's geography, borders, and governance; and increased emphasis on the critical role state and local governments, including the extent to which such control is indicative of the American experience.
  - **The Pluribus:** Thoughtful attention to tribal contributions, immigration, and the struggles of various groups in shaping the nation; pluralism and tolerance as essential civic virtues within the system; and civil rights and contemporary issues, including a focus on the post-Civil Rights Movement era and the persistence of civic participation in overcoming obstacles
  - **Informed and Engaged Civic Participation:** Energetic significance applied to information literacy, the impact of digital technology, and the influence of information landscapes on how people engage in and interact with civic issues and institutions; the dispositions and principles required for cultivating a commitment to democratic forms of government; and comparative governance and America’s role in an interconnected world.

Thank you for your interest and investment in civic education for American democracy. If we can be of any assistance in your efforts, please contact me at [emma.humphries@icivics.org](mailto:emma.humphries@icivics.org).

Sincerely yours,



Louise Dubé | CEO



Shawn Healy, PhD | Chief Policy & Advocacy Officer



Emma Humphries, PhD | Chief Education Officer



## NAEP Civics Framework Should be Revised

### Overview

The Civics Framework used to develop the 2018 NAEP Civics exam is the same framework originally written in 1996 and published in 1998 — making it approximately **30 years old**. This continuity may have been maintained intentionally to allow trend reporting across assessment years. However, the civic learning landscape, state standards, and evidence on various pedagogical approaches have evolved dramatically since the mid-1990s. On behalf of the Illinois Civic Mission Coalition, we respectfully submit a public comment to the National Assessment Governing Board arguing that the Board needs to update the Civics Framework. Below, we outline which revisions should be made based in part on the major progress Illinois has continued to make in implementing and elevating the civic learning standards in the Land of Lincoln because of our effort as a bipartisan coalition for civic learning in Illinois. The latest middle-school Social Science Standards revision in Illinois was adopted in 2022, shortly after the state also began mandating a semester worth of civic learning in middle school in 2020.

Our recommendations below draw from frameworks used in Illinois (which has had a very recent standards revision) and Massachusetts (which received A grade for its content rigor and specificity in the most recent Fordham Institute’s review of Civics and History frameworks) to identify elements of the NAEP Civics framework that need updating and what revisions should include.

This report compares the NAEP 2018 Civics Framework with:

- **Massachusetts' 2018 History and Social Science Curriculum Framework** (grades 5–8)[5]
- **Illinois' 2022 Learning Standards for Social Science** (the most recently adopted comprehensive state social studies framework, grades 6–8)[6][7]

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## How the NAEP Civics Framework Appears Out of Date

### *No Digital or Media Literacy Component*

The NAEP framework was written before social media existed and before the internet transformed how citizens access and evaluate civic information. In fact, it was written when the

Internet was in its nascent stage - 1990s. As two Governing Board members noted, the framework was created "when punch ballots were common at the polls and before social media made its mark on politics". In contrast, Massachusetts' 2018 framework includes dedicated **news/media literacy standards** at grade 8, requiring students to evaluate digital information, distinguish news from opinion, and assess source credibility. Illinois' 2022 standards embed **source evaluation** across all complexity levels, asking students to determine credibility "based upon their origin, authority, and context". The NAEP framework has no equivalent.[2][8][7]

#### *No Inquiry-Based Pedagogical Framework*

The NAEP framework organizes civic learning around five "enduring questions" (e.g., *What are civic life, politics, and government?*), which serve primarily as content organizers for a knowledge-focused assessment. Modern state standards have moved toward inquiry as a central organizing principle. Massachusetts' 2018 framework introduced **Standards for History and Social Science Practice** emphasizing formulating questions, conducting research, evaluating sources, and synthesizing information. Illinois' 2022 standards are explicitly built on the **C3 Framework's Inquiry Arc**, with four skill domains: recognizing perspectives and articulating identities, developing questions and planning inquiries, evaluating sources and using evidence, and communicating conclusions and taking informed action. The NAEP framework assesses intellectual skills (identifying, explaining, evaluating), but these are treated as cognitive operations on pre-defined content rather than as a student-driven inquiry process.[9][7][1][5]

#### *Limited Attention to Varied Perspectives of Various People and Communities*

The NAEP framework addresses "unity and diversity" within the context of American political values and mentions the importance of individual rights and human dignity. However, it does not explicitly engage students in analyzing how and why people of various backgrounds hold varied opinions and take different informed action as citizens. These themes are now central to modern civic education. Illinois' 2022 standards draw explicit attention to the need for teachers and students to recognize, articulate, and analyze how perspective and systems influence and impact social change. Illinois requires students at grades 6–8 to evaluate how "the application of laws and the protection, granting, or denial of individual and collective rights have impacted participation and powers of various groups of people". Massachusetts' 2018 framework also places emphasis on diverse perspectives, noting that instruction should address "the contributions of women and men of all ethnicities and backgrounds" and encourage "honest and informed academic discussions about prejudice, racism, and bigotry in the past and present".[7][1][5]

#### *No "Taking Informed Action" Component*

A defining feature of both the C3 Framework and Illinois' 2022 standards is Dimension 4: **Communicating Conclusions and Taking Informed Action**. This requires students to apply

their civic learning by participating in democratic processes — such as deliberating, presenting arguments to external audiences, and implementing civic actions in school or community settings. The NAEP framework explicitly states that "any direct measurement of participatory skills, such as participating in student government or attending public meetings, is beyond the scope of the assessment". While understandable for a standardized assessment, this means the NAEP does not capture what many states now consider the culminating purpose of civic education.[1][9][7]

#### *No Attention to State and Local Governance*

Massachusetts' grade 8 course includes a dedicated topic on **Massachusetts state government**, covering the state constitution, governor, legislature, courts, and local government structures such as town meetings and city councils. Illinois' standards reference both the **U.S. Constitution and the Illinois Constitution** and address impacts at "national to local scale". The NAEP framework focuses almost exclusively on the national level of American government, with limited attention to state-level civic structures or how federalism operates in practice at the local level.[5][7]

#### *Outdated Civic Participation Context*

The framework envisions civic participation through traditional mechanisms — voting, attending public meetings, writing letters, and joining organizations. It does not account for modern forms of civic engagement such as online petitions, social media advocacy, digital organizing, crowdfunding for civic causes, or engaging with government through digital platforms. State frameworks written in 2018 and 2022 implicitly or explicitly incorporate these realities.[1]

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## **Areas of Alignment**

Despite its age, the NAEP Civics Framework retains meaningful alignment with modern state standards in several foundational areas.

#### *Core Constitutional Knowledge*

All three frameworks place the **U.S. Constitution, Declaration of Independence, and Bill of Rights** at the center of civic education. The NAEP framework's organizing Question II ("What are the foundations of the American political system?") and Question III ("How does the government established by the Constitution embody the purposes, values, and principles of American democracy?") directly correspond to Massachusetts' Grade 8 Topics 1 and 2 (philosophical foundations and development of U.S. government) and Illinois' civics standards

on "origins, functions, and structure of government with reference to the U.S. Constitution".[7][5][1]

### *Three-Part Structure: Knowledge, Skills, and Dispositions*

The NAEP framework's three-component model — **civic knowledge, intellectual and participatory skills, and civic dispositions** — remains the foundational architecture shared by modern standards. Massachusetts explicitly structures its mission around preparing students with "knowledge, skills, and dispositions" for democratic participation. Illinois organizes around disciplinary concepts (knowledge) and inquiry skills (application), with civic virtues and democratic principles integrated throughout.[5][7][1]

### *Emphasis on Citizen Rights and Responsibilities*

The NAEP framework's Question V ("What are the roles of citizens in American democracy?") aligns closely with Massachusetts' Grade 8 Topic 4 (rights and responsibilities of citizens, including voting, protest, interest groups) and Illinois' standards on citizenship status, rights, and roles (e.g., "voters, jurors, taxpayers, military, protesters, and officeholders").[7][1][5]

### *Democratic Principles and Institutions*

All three frameworks require students to understand the separation of powers, checks and balances, federalism, elections, and the role of political parties. The NAEP framework devotes 25% of grade 8 content to governmental institutions, which maps onto Massachusetts' Topic 3 (institutions of U.S. government) and Illinois' standards on analyzing "the roles of political, civil, and economic organizations from a national to local scale".[1][7]

### *Progressive Complexity*

The NAEP framework's achievement levels (Basic, Proficient, Advanced) and its differentiated content expectations across grades 4, 8, and 12 reflect a developmental progression. This aligns with Illinois' complexity-level approach (Less Complex, Moderately Complex, More Complex) for grades 6–8 and Massachusetts' grade-by-grade scaffolding from elementary civics foundations through a dedicated grade 8 course.[5][7][1]

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## Comparison at a Glance

<b>Dimension</b>	<b>NAEP 2018 Civics Framework</b>	<b>Massachusetts 2018 (Gr. 5–8)</b>	<b>Illinois 2022 (Gr. 6–8)</b>
<b>Year originally written</b>	1996 (published 1998)[1]	2018[5]	2022[7]
<b>Organizing principle</b>	5 content questions + skills taxonomy[1]	Content standards + Practice Standards[5]	Inquiry Arc (C3-based) + Disciplinary Concepts[7]
<b>Inquiry skills</b>	Intellectual skills (identify, explain, evaluate)[1],	Practice Standards for inquiry; informed action required as capstone in 8th [5]	Full 4-dimension inquiry arc, including informed action [7]
<b>Media/digital literacy</b>	<b>Not addressed</b> [2]	News/media literacy standards at grade 8[8]	Source evaluation embedded[7]
<b>Taking informed action</b>	<b>Explicitly excluded from assessment</b> [1]	Implicit through practice standards[5]	Central component (Dimension 4)[7]
<b>State/local government</b>	<b>Limited</b> [1]	Dedicated MA government topic[5]	References IL Constitution, local to national[7]

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### Should the NAEP Civics Framework Be Renewed?

The evidence strongly supports renewal, for several reasons:

#### *The Framework Has Not Been Updated in Three Decades*

A 30-year-old framework cannot adequately capture the civic knowledge and skills students need in 2026. The political, technological, and social contexts of citizenship have transformed since the mid-1990s. The Governing Board itself has initiated a formal review, with a decision on launching revisions expected at its May 2026 meeting.[3][2]

### State Standards Have Significantly Evolved

Since 1998, most states have revised their social studies standards at least once, many incorporating the **C3 Framework** (published 2013) as a guiding reference. Massachusetts added a dedicated grade 8 civics course, inquiry-based practice standards, and news/media literacy in 2018. Illinois completed a ground-up revision in 2022 centered on identity, inquiry, equity, and action. Rhode Island published new Social Studies Standards in 2023 with an accompanying Curriculum Framework in 2024. The NAEP framework no longer reflects the "current state of the art" in civic education.[10][11][9][7][5]

### *Low Student Achievement Demands a Better Diagnostic Tool*

With only **22% of 8th graders reaching NAEP Proficient** and a third not reaching Basic, the nation needs an assessment framework that can more precisely diagnose what students know and can do in a modern civic context. A renewed framework could assess media literacy skills, the ability to evaluate competing claims, and applied civic reasoning — areas where students are likely struggling but which the current framework cannot measure.[2]

### *State-Level Reporting Is Coming*

NAEP is adding voluntary **state-level civics reporting** starting in 2029. For this data to be meaningful and actionable for state policymakers, the framework should align more closely with the standards states have actually adopted. If the NAEP framework remains anchored in 1996 content priorities, the state-level data it generates will be less useful for diagnosing and improving civic instruction.[12]

### *NCSS and the Field Have Called for Alignment*

The National Council for the Social Studies (NCSS) has urged NAGB to align the NAEP Civics framework with the C3 Framework and to include the social studies field in framework development decisions. The current framework was developed before the C3 Framework existed.[12]

### *Core Strengths Should Be Preserved*

Renewal does not mean starting from scratch. The NAEP framework's emphasis on constitutional knowledge, democratic values, and governmental institutions remains valid and broadly shared across state standards. A renewal should update the framework to incorporate inquiry, media literacy, equity analysis, and civic action while maintaining its strong foundation in the enduring principles of American constitutional democracy.

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## Conclusion

The NAEP 2018 Civics Framework retains strong alignment with modern standards on foundational constitutional content, democratic principles, and the knowledge-skills-dispositions triad. However, it is significantly out of step with the field's current emphasis on inquiry-based learning, media and digital literacy, equity and power analysis, and applied civic action. Given that state standards have moved decisively in these directions, and that the Governing Board is actively soliciting input on revision, the framework should be renewed to ensure the Nation's Report Card in civics measures what 21st-century citizenship actually requires.

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## References

1. [Civics Framework for the 2018 National Assessment of Educational ...](#) - This civics assessment will use the same framework as was used in 1998 to enable NAEP to report on t...
2. [Nation's Report Card in Civics Getting a Makeover - Education Next](#) - The 2022 NAEP civics results, the most recent ones we have, showed that just 22 percent of students ...
3. [\[PDF\] Federal Register/Vol. 91, No. 30/Friday, February 13, 2026/Notices](#) - the revision process for the NAEP Civics. Framework is anticipated to be adopted at the May 2026 qua...
4. [Seeking Initial Public Comment Prior To Updating the Civics ...](#) - If the Governing Board decides that an update is needed, the charge to launch the revision process f...
5. [\[PDF\] History and Social Science Framework](#) - I am pleased to present to you the 2018 Massachusetts History and Social Science Curriculum. Framewo...
6. [Illinois Social Science Standards & Mandates](#) - ISBE has identified six competencies aligned with the revised Illinois Social Science Standards in 2...
7. [\[PDF\] Illinois Learning Standards for Social Science - ISBE.net](#) - Like the C3 framework, the revised Illinois Learning Standards for Social Science are driven by the ...
8. [Massachusetts History & Social Science Framework](#) - Massachusetts updated their History and Social Science curriculum framework for 2018 to include medi...

9. [\[PDF\] College, Career, and Civic Life \(C3\) Framework](#) - The College, Career, and Civic Life (C3) Framework for Social Studies State Standards: Guidance for ...
10. [Social Studies | RI Department of Education - RI.gov](#) - Social Studies Core Curriculum Reviews In addition, the new Social Studies Curriculum Framework, p...
11. [\[PDF\] Social Studies Standards - New Mexico Public Education Department](#) - Efforts to provide guiding frameworks for the revision of social studies standards include the. Nati...
12. [NCSS Response to the Updated NAEP Schedule | Social Studies](#) - The updated schedule includes changes to the NAEP Civics and U.S. History assessment frameworks and ...

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March 3, 2026

Dear Executive Director Muldoon,

The National Assessment Governing Board (NAGB) has asked for public comment prior to updating the Civics Assessment Framework for the National Assessment of Educational Progress (NAEP).<sup>1</sup> It has asked specifically for comments to address three questions:

- Does the NAEP Civics Assessment Framework need to be updated?
- If the framework needs to be updated, why is a revision needed?
- What should a revision to the framework include?

The National Association of Scholars (NAS) and the Civics Alliance do believe that the NAEP Civics Assessment Framework (NAEP-CAF) needs to be updated, above all to refocus upon essential civics knowledge and to remove alignments with politicized material, including “action civics.” We urge the NAGB to undertake a series of reforms to improve the NAEP-CAF.

### NAEP-CAF Shortcomings

The existing NAEP-CAF has been **politicized**, above all by aligning with “action civics”—vocational training in progressive activism that replaces classroom civics education.<sup>2</sup> The NAEP-CAF currently measures student knowledge of *intellectual skills*, *participatory skills*, *civic*

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<sup>1</sup> *Civics Framework for the 2018 National Assessment of Educational Progress* (National Assessment Governing Board, U.S. Department of Education), <https://www.nagb.gov/content/dam/nagb/en/documents/publications/frameworks/civics/2018-civics-framework.pdf>.

<sup>2</sup> Stanley Kurtz, “‘Action Civics’ Replaces Citizenship with Partisanship,” *The American Mind*, January 16, 2021, <https://americanmind.org/memo/action-civics-replaces-citizenship-with-partisanship/>; Thomas K. Lindsay and Lucy Meckler, “*Action Civics*,” “*New Civics*,” “*Civic Engagement*,” and “*Project-Based Civics*”: *Advances in Civic Education?* (Texas Public Policy Foundation, 2020), <https://www.texaspolicy.com/wp-content/uploads/2020/09/Lindsay-Meckler-Action-Civics.pdf>.

*dispositions*, and *civic skills*. All these phrases serve as euphemisms for action civics. NAEP-CAF also reveals politicization by radicalized language, such as:

- referring to America as a *constitutional democracy* or a *democracy* rather than as a *republic*, and
- referring to patriotic language and symbols by the dismissive adjective *emotional*.

The NAEP-CAF should be updated to remove all politicized language and all alignment with politicized pedagogy.

The NAEP-CAF also **lacks essential civics focus**. Civics education should include, as primary categories, knowledge of our foundational documents of liberty (e.g., the Declaration of Independence, the Constitution), as well as of their intellectual sources. It also should focus upon America’s constitutional history. The NAEP-CAF should be updated to add these as primary categories of testable knowledge.

The NAEP-CAF also should be reformed to provide **assessable rigor**. The NAEP-CAF has been reduced from tests in Grade 4, Grade 8, and Grade 11 to just one test at Grade 8. That one test is not done at a scale large enough to allow for state-level disaggregation. The NAEP-CAF’s baseline for proficiency also may have been substantially degraded, because it does not provide large enough samples of classical school students and home school students—whose civics facility would provide a useful baseline for proficiency.

### Revision Recommendations

*Do Not Use AIR as a Contractor*: The NAGB should not entrust updating the NAEP-CAF to the American Institutes for Research (AIR). Organizations that hire AIR to take part in their social studies and civics work standardly produce products<sup>3</sup> that recapitulate the flaws of the National Council for the Social Studies’ (NCSS) ideologically extreme definition of social studies,<sup>4</sup> and of its *College, Career, and Civic Life (C3) Framework for Social Studies State Standards*, which replaces content knowledge with insubstantial and opaque “inquiry”; replaces social studies pedagogy with identity politics ideologies such as Critical Race Theory; and inserts ideologically extreme pedagogies such as Action Civics.<sup>5</sup> A decision to hire AIR is tantamount to a decision to adopt the ideologically extreme structure of the *NCSS’ C3 Framework*. The NAGB should not hire AIR, or in any way involve AIR, in any part of the creation or revision of the NAEP-CAF.<sup>6</sup>

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<sup>3</sup> E.g., Alaska Social Studies Standards (2024), Department of Education and Early Development, <https://education.alaska.gov/akstandards/Adopted-AK-SS-Standards-2024.pdf>. “Alaska completed our RFP process and we received one vendor application for the facilitator. American Institutes for Research (AIR) was the selected vendor.” Kelly Manning (Deputy Director) to David Randall, March 31, 2023.

<sup>4</sup> Comment on the NCSS’s New “Social Studies” Definition, Civics Alliance, <https://civicsalliance.org/comment-on-the-ncsss-new-social-studies-definition/>.

<sup>5</sup> David Randall, *Issue Brief: The C3 Framework*, National Association of Scholars, <https://www.nas.org/blogs/article/issue-brief-the-c3-framework>; Stanley Kurtz, “Consensus by Surrender,” *National Review*, June 10, 2021, <https://www.nationalreview.com/corner/consensusby-surrender/>.

<sup>6</sup> Furthermore, journalists recently have published evidence that AIR has overcharged the federal government for its work as a contractor. Alex Gutentag and Michael Shellenberger, “US Education Department Contractor Overcharged Taxpayers While Spending Millions On Executive Salaries,” *Public*, March 17, 2025,

*Consider an Alternate Contracting Consortium:* The existing Civics Assessment Framework was jointly drafted by the Council of Chief State School Officers with the Center for Civic Education and the American Institutes for Research. The NAGB should consider an alternate contracting consortium, consisting (for example) of Classic Learning Initiatives, the Core Knowledge Foundation, the Hamilton School for Classical and Civic Education at the University of Florida, and Hillsdale College.

*Align with Alternate Standards:* The NAEP-CAF now boasts of its consistency with the Center for Civic Education’s *National Standards for Civics and Government*. The NAGB should direct a new contractor to align the NAEP-CAF with better standards, such as *The Hillsdale College K-12 History & Civics Curriculum*,<sup>7</sup> *Foundations of Freedom: Louisiana High School Civics*,<sup>8</sup> and *American Birthright: The Civics Alliance’s Model K-12 Social Studies Standards*.<sup>9</sup>

*Consider Aligning with the U.S. Civics Test:* 25 states now align their K-12 civics instruction with the U.S. Civics test given to immigrants who wish to be naturalized. The NAGB should consider aligning tested content with the content of the U.S. Civics Test—specifically, the existing (2026) 128-question civics test.

*Strengthen Testing Scope:* The NAGB should request sufficient resources to allow it to restore tests for the 4<sup>th</sup> grade, the 8<sup>th</sup> grade, and the 11<sup>th</sup> grade, rather than simply retaining the 8<sup>th</sup> grade test. It should increase the frequency of the tests to be every two years. It also should increase the number of tested students to allow for significant sample sizes from 1) each state; 2) from classical school students; and 3) from home school students. The NAGB should oversample students from smaller states, classical schools, and home schools, to ensure that it has sufficient sample sizes.

*Strengthen Testing Rigor:* NAGB should establish rigorous baselines for proficiency. It should do so not least by examining its classical school and home school samples to establish a properly rigorous baseline for proficiency. NAGB also should use computerized assessments to seek out and grade for especially advanced proficiency. Computer technology now allows assessments to determine fine gradations among elite performers. NAGB should determine in granular detail the elite performers on the NAEP-CAF, not least to provide useful material for civics-focused scholarship and grant programs.

*Remove Questions on Participatory Skills and Civic Dispositions:* The current NAEP-CAF devotes 10-15% of questions to “students’ knowledge and understanding of participatory skills”, and another 10-15% to “questions related to civic dispositions”.<sup>10</sup> The NAGB should remove these categories and these questions entirely from the NAEP-CAF. To do so, NAGB should focus on

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<https://www.public.news/p/us-education-department-contractor>. Prudence suggests that the NAGB should investigate whether AIR has overcharged it for its previous work, and hesitate before contracting with it again.

<sup>7</sup> *The Hillsdale College K-12 History & Civics Curriculum*, Hillsdale College, <https://k12.hillsdale.edu/Curriculum/Hillsdale-K12-American-History/>.

<sup>8</sup> *Foundations of Freedom: Louisiana High School Civics*, Louisiana Department of Education and Core Knowledge Foundation, <https://www.coreknowledge.org/louisiana-foundations-of-freedom/>.

<sup>9</sup> *American Birthright: The Civics Alliance’s Model K-12 Social Studies Standards*, Civics Alliance, <https://civicsalliance.org/american-birthright/>.

<sup>10</sup> *Civics Framework for the 2018 National Assessment of Educational Progress*, p. 43.

reducing the content assigned to the question category “What are the roles of citizens in American democracy?”

*Remove Inquiry Format:* The current NAEP-CAF uses an “inquiry-based” format even to categorize Civic Knowledge, framing it in terms of five questions.<sup>11</sup> These should be rephrased as five content knowledge categories—identifying categories of knowledge, not questions. The careful distribution of questions by Intellectual Skills likewise reflects education-school fussiness rather than an essential category for the NAEP-CAF.<sup>12</sup> NAGB should consider whether to eliminate these requirements, if they get in the way of drafting a sensible test by subject matter.

*Add Categories on Primary Sources, Intellectual Influences, and Constitutional History:* The current NAEP-CAF devotes 25% of Grade 8 questions to “What are the foundations of the American political system?”<sup>13</sup> This category should be increased to three categories, including America’s Foundational Documents of Liberty, Intellectual Sources for America’s Foundational Documents of Liberty (including the Bible and Protestant political theory, Greco-Roman political thought, English law, the Enlightenment, and colonial American ideas and practice), and Constitutional History. These categories should be framed to generate questions that assess students’ familiarity with and ability to analyze the foundational primary sources of America’s civic inheritance. The portions of the NAEP-CAF currently assigned to Participatory Skills and Civic Dispositions should be reassigned to these categories.

*Confine Text-based Stimulus Materials to Historical Examples:* The current NAEP-CAF now allows text-based stimulus materials to include contemporary documents. This allows questions that align with action civics: “For example, students may be asked to take a position regarding a community planning issue after examining a map and reading about the proposed change.”<sup>14</sup> Text-based stimulus materials only should include historical documents, which allow no prompts for action civics.

*Reform Civic Participation Category:* The current category “What are the roles of citizens in American democracy?” focuses excessively on how citizens should influence government or hold government to account. While this matters, it underplays tests on how citizens can *participate* in government—as aldermen and mayors, as school board members and judges, as jurors and members of the National Guard, as policemen, firemen, and members of the Border Patrol. At least half the questions in this category should focus on different forms of civic participation in government. This category also should include questions on civil society, including assessment of knowledge of *Robert’s Rules of Order*.

*Depoliticize Throughout:* The NAGB should ensure that the NAEP-CAF includes no politicized language or content. For example:

- Refer to the United States exclusively as a *republic*, never as a *constitutional democracy* or a *democracy*.
- Refer to *patriotic* language and symbols, not *emotional* language and symbols.

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<sup>11</sup> *Civics Framework for the 2018 National Assessment of Educational Progress*, p. 41.

<sup>12</sup> *Civics Framework for the 2018 National Assessment of Educational Progress*, p. 42.

<sup>13</sup> *Civics Framework for the 2018 National Assessment of Educational Progress*, p. 41.

<sup>14</sup> *Civics Framework for the 2018 National Assessment of Educational Progress*, p. 46.

- Include no material that aligns with action civics, including *service-learning*. Carefully inspect language referring to *volunteering*, *building coalitions*, *advocating*, *deliberating on public issues*, *holding public officials accountable*, *petitioning*, and *participating in civic and advocacy groups*, to see if it euphemizes action civics.
- Seek the best civics education rather than a “broad consensus,” since the “broad consensus” now includes dedicated proponents of politicizing civics education.
- Define *equality* exclusively as *equality of opportunity*, so as to avoid giving countenance to the oppressive ideology of *equity*.
- Craft the NAEP-CAF without worrying about *bias* or *contextual information*, since these frequently serve as euphemisms for politicized content and pedagogy.

### Conclusion

NAS and the Civics Alliance believe that these reforms would greatly strengthen the NAEP-CAF. We strongly urge the NAGB to undertake them.

Respectfully yours,



Peter Wood  
President, National Association of Scholars



David Randall  
Executive Director, Civics Alliance

The National Council for the Social Studies (NCSS) appreciates the opportunity to comment on whether and how the National Assessment of Educational Progress (NAEP) Civics Framework should be updated. As the nation’s largest professional association representing K–12 social studies educators, teacher educators, researchers, and state and district leaders from all 50 states, DC, and Puerto Rico, NCSS believes this is a critical moment for civic education and supports a thoughtful revision of the framework.

Since the framework’s last update decades ago, the civic, political, and information environments in which young people are developing have changed significantly. Students today must navigate an increasingly complex and fragmented media landscape, evaluate competing claims, engage with diverse perspectives, and make sense of civic life in real time. A revised NAEP Civics Framework should reflect these realities while maintaining stability and coherence in its overall structure.

NCSS recommends a balanced approach: preserving the strengths of the current framework while making targeted, meaningful updates that ensure its continued relevance. In particular, the framework should assess the full range of civic learning, including knowledge, skills, and dispositions. While understanding foundational democratic principles, institutions, and processes remains essential, it is equally important that students demonstrate the ability to analyze evidence, evaluate sources, engage in respectful exchange of ideas, and deliberate across differences while also applying that learning to their local environments where they can be the most engaged.

In a world where misinformation and disinformation increase, a central priority for any revision should be the inclusion of media and information literacy as a core dimension of civic competence. Students must be prepared to assess the credibility of information, distinguish fact from opinion, and engage responsibly in digital civic spaces. Strengthening this dimension of the framework is essential to supporting informed and effective participation in democratic life.

NCSS also emphasizes that civic learning is most powerful when it is connected to the other social studies disciplines. History, geography, and economics provide essential context for understanding civic issues and for developing evidence-based reasoning. A revised civics framework should reflect these interdisciplinary connections rather than treating civics as an isolated field of study.

In addition, NCSS urges that the framework reflect the importance of inquiry, real-world application, and local civic engagement. Students should have opportunities to engage with authentic public issues, apply their knowledge in meaningful contexts, and develop the habits of participation that sustain pluralistic democratic societies.

Ensuring every learner has what they need to succeed must remain central to this work. NAEP results have consistently highlighted disparities in civic knowledge and opportunities to learn. Any revision of the framework should be attentive to these differences and support a vision of civic education in which all students have access to high-quality, inquiry-based learning experiences that prepare them for civic life.

At the same time, NCSS underscores the importance of maintaining a broad, inclusive, and nonpartisan vision of civic education. The NAEP Civics Framework plays a significant role in shaping how civic learning is understood nationally. It is essential that the framework reflect the complexity of democratic life and avoid narrowing civics to a limited or ideologically driven conception of citizenship.

Finally, NCSS believes that meaningful input from the social studies education community is essential to the success of this effort. As the professional home for educators and scholars across the field and the nation, NCSS stands ready to contribute its expertise and encourages the National Assessment Governing Board to include representatives from NCSS and the broader social studies community in all phases of framework development. Ensuring that experienced educators, researchers, and state- and district-level social studies leaders are at the table will strengthen both the process and the resulting framework.

NCSS supports updating the NAEP Civics Framework through a careful, balanced process that preserves its strengths while addressing the most pressing demands of contemporary civic life. This is a rare and important opportunity to ensure that what is assessed reflects the knowledge, skills, and dispositions students need to participate thoughtfully and effectively in a pluralistic democratic society.

March 26, 2026

### **Public Comment on the NAEP Civics Assessment Framework**

The News Literacy Project appreciates the opportunity to comment on the National Assessment Governing Board’s review of the NAEP Civics Assessment Framework. We commend the Board for its longstanding commitment to measuring the knowledge and skills students need for informed and responsible civic participation.

We especially want to recognize the framework’s focus on students’ ability to analyze information presented through various media formats in a complex and rapidly changing information landscape. The ability to discern the purposes and intent of different types of information and determine the credibility of sources is essential to being civically engaged.

While preserving these components, we strongly encourage the Board to consider expanding and deepening the framework’s treatment of news literacy – particularly the role of a free and independent press in American democracy and the standards of quality journalism. The current framework calls for relevant intellectual and participatory skills. It also should include an understanding of the need for professional and ethical standards in the practice of quality journalism. Students can then apply this knowledge when determining for themselves the credibility of information and sources.

Civic education is incomplete if students are not equipped to understand why the press exists, how it functions as a democratic institution and what responsibilities citizens share in sustaining a healthy information ecosystem.

An updated framework that more explicitly incorporates these elements would strengthen students’ ability to:

- Distinguish journalism from opinion, propaganda, misinformation and sponsored content.
- Understand the constitutional and historical foundations of press freedom.
- Recognize the press as a mechanism for public accountability.
- Determine the credibility of news and other information by applying standards of ethical journalism to the information they seek, share and produce.
- Navigate digital information environments with greater discernment and take responsibility for one’s own role online. For example, students would examine how personalization of algorithms can create echo chambers, and they would extend their news diets to include evidence-based opinions and alternative perspectives across multiple platforms.
- Participate more confidently and responsibly in civic dialogue.



The 2024 report [News Literacy in America](#) found that 74% of teens that received media literacy instruction reported engaging in civic-minded activities. These teens were more likely than their peers to reference credible sources when sharing an opinion, push back on misinformation or reach out to journalists or news outlets to provide feedback.

By integrating richer content and competencies related to news literacy, the NAEP Civics Assessment Framework can better reflect the realities of contemporary civic life and help ensure that students nationwide are prepared for informed civic decision making.

We appreciate the Board's leadership and continued work to strengthen civics education for all students. Thank you for considering these recommendations as part of the framework revision process.

Sincerely,

A handwritten signature in black ink, appearing to read "CS", written in a cursive style.

Charles Salter

President & Chief Executive Officer

**From:** [Madison Henry](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Wednesday, March 18, 2026 3:00:49 PM

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Dear National Assessment Governing Board,

With the United States celebrating its 250th anniversary this year, updating the National Assessment of Educational Progress (NAEP) is both timely and necessary. The current NAEP Civics Assessment Framework is nearly three decades old and no longer fully reflects the civic knowledge and skills students need for effective civic engagement in the 21st century.

Additionally, the current assessment has been administered to only 8th graders since 2010, and there are no plans to assess 4th and 12th graders again until 2029, leaving a 19-year generational gap in civics proficiency data for both elementary and high school students. Congress provided funding for NAEP testing across grade bands and a larger sample allowing for state level disaggregation for fiscal years 2022 and 2023. However, the National Assessment Governing Board (NAGB) has so far failed to accelerate the timeline for implementation, meaning we'll have an unacceptable seven-year gap in results from 2024 until Spring 2030.

There is broad consensus that K–12 students need stronger civics education, and assessing what students know is a critical first step for states seeking to improve learning in this essential subject. Recent reports underscore the urgency of this matter: In 2022, [only 22 percent of students reached the NAEP Proficient level](#) in civics, while roughly one-third did not even reach the NAEP Basic level, suggesting many students cannot describe the structure of government or explain how Congress fulfills its responsibilities.

Because democracy is not self-sustaining and civic skills must be learned by each new generation, the updated framework should reflect the knowledge students need to understand how government functions and how to participate in it effectively. Such updates should account for recent scholarship in civics and history content and pedagogy such as that reflected in the [Roadmap to Educating for American Democracy](#). These updates will ensure the NAEP Civics Assessment supports a shared national goal: building a strong civic culture in which all Americans are prepared to engage with and strengthen our democracy.

Sincerely,

Rock the Vote

*[Rock the Vote](#) is a nonpartisan nonprofit organization dedicated to building the political power of young people.*

March 27, 2026

National Assessment Governing Board  
400 Maryland Ave. SW  
Washington, DC 20202  
Mailstop: 1A112D

Dear Members of the National Assessment Governing Board,

Thank you for the opportunity to provide input on the National Assessment of Educational Progress (NAEP) Civics Framework. At a moment when our nation’s civic fabric is under increasing strain, this work could not be more important.

A strong civic education begins with shared knowledge. If students are to think critically, they must first know something worth thinking about. That means a clear, coherent understanding of the principles, institutions, and history that define our constitutional republic.

The current framework rightly centers civic knowledge, intellectual and participatory skills, and civic dispositions as interdependent components of citizenship. This integrated approach reflects a fundamental truth: knowledge is not an end in itself, but the foundation upon which reasoning, analysis, and responsible participation are built.

Students must understand the architecture of our system—its founding principles, its institutions, and the enduring questions that shape civic life. They must be able to analyze arguments, weigh evidence, and engage in civil discourse. And they must be prepared to assume the responsibilities of citizenship in ways that sustain and strengthen our republic.

This work is especially urgent as we approach the 250th anniversary of the American founding. If we are to preserve America for another 250 years, the next generation must not only inherit our freedoms—they must understand them, value them, and be prepared to steward them.

A national assessment framework plays a critical role in setting expectations for what it means to be civically literate. That expectation should be clear: students across every state should graduate with a shared foundation of civic knowledge—grounded in our founding documents, informed by our history, and connected to the responsibilities of self-government.

As the Governing Board considers revisions to the Civics Framework, continued clarity around essential civic knowledge is critical. Students should demonstrate understanding of fundamental democratic principles, constitutional structures, the functions of government, individual rights, and the rule of law. These content expectations provide the necessary foundation for assessing students' civic reasoning and their ability to apply knowledge to public issues.

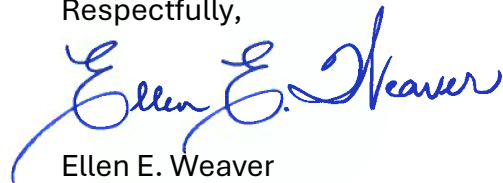
Intellectual and participatory skills are most meaningfully assessed when they are grounded in substantive content and civic knowledge. Assessment tasks that engage students in interpreting primary sources, evaluating evidence, analyzing differing perspectives, and applying constitutional principles allow them to demonstrate how civic knowledge informs reasoning about democratic processes and supports informed judgment rather than opinion alone.

The framework's attention to civic dispositions should reflect students' capacity for civil discourse and civic engagement. Students should be prepared to engage respectfully with others, consider multiple viewpoints, and participate thoughtfully in civic life consistent with the norms of a constitutional republic. Clear and careful language distinguishing assessable civic understandings—such as knowledge of democratic norms, civil discourse, and pluralism—from personal beliefs or behaviors outside the scope of assessment could strengthen the framework and help preserve construct validity.

In South Carolina, we are working to ensure that civics education is content-rich, coherent, and anchored in the principles of our constitutional republic—equipping students to steward our freedom, sustain our system of government, and shape our shared future with wisdom and courage.

We appreciate the Governing Board's leadership in this effort and support continued work to ensure that the NAEP Civics Framework reflects the depth, clarity, and coherence required to prepare informed, capable citizens.

Respectfully,



Ellen E. Weaver  
State Superintendent of Education

**From:** [Alexander Adriano](#)  
**To:** [NAGB Queries](#)  
**Cc:** [blauw@civiced.org](mailto:blauw@civiced.org); [phillips@civiced.org](mailto:phillips@civiced.org)  
**Subject:** NAEP Civics Framework — Comment from Utah  
**Date:** Thursday, March 26, 2026 1:21:08 PM

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Dear Members of the National Assessment Governing Board,

As Director of Civic Engagement at Utah Law-Related Education, I work closely with teachers and students across the state to support civic learning through programs such as We the People and Project Citizen, as well as social studies teacher professional development and statewide civic learning experiences such as our Civic Discovery Tour. From this statewide perspective, I believe the NAEP Civics Assessment Framework should be updated. While its foundational emphasis on civic knowledge, participatory skills, and dispositions remains sound, the civic environment students navigate today has changed significantly. An updated framework is necessary to ensure that NAEP continues to measure the knowledge and competencies students need to participate meaningfully in a constitutional democracy.

In my work with classrooms across Utah, civic knowledge and civic participation are clearly deeply interconnected. Students develop a more meaningful and lasting understanding of constitutional principles when engaged in experiential civic learning—whether through simulated congressional hearings, facilitated discussions on public issues, or research on public policy questions. Teachers consistently report that these experiences deepen students' ability to analyze current events through a constitutional lens, engage in civil discourse, and make connections between historical principles and contemporary issues. These outcomes are observable in how students speak, reason, and respond to complex questions.

**Feedback collected from Utah teachers and students during the 2026 program year of our civic engagement initiatives, including We the People, reinforces this.** On a five-point scale (with one indicating low impact and five indicating high impact), teachers rated the overall value of these civic learning experiences at 4.73 out of 5, with similarly strong ratings for student civic knowledge, research and source evaluation, and confidence in public speaking. Students reported increased understanding of constitutional principles (4.39/5), improved ability to express their views on important issues (4.36/5), and greater respect for differing perspectives (4.36/5). These results suggest that when students engage in rigorous, experiential and applied civic learning, they develop not only knowledge, but also the skills and dispositions necessary for informed participation in public life.

For these reasons, a revised NAEP Civics Framework should preserve and strengthen

**From:** [Matthew Kelly](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework.  
**Date:** Friday, March 27, 2026 9:47:13 AM

**CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good morning,

My name is Matt Kelly, and I serve as the Secondary Social Studies Coordinator in the Office of Academic Support at the West Virginia Department of Education. The comments below represent areas our office has identified as potential opportunities for revision within the NAEP Framework. For clarity and ease of reference, these comments are organized in table format. Our feedback focuses on two primary areas: *Evaluating Civic Information in Modern Contexts* and *Alignment of Testing Timing and Instruction*. Please let me know if you have any further questions or comments. Thank you for your time and consideration.

<b>Evaluating Civic Information in Modern Contexts</b>	
<b>Does the NAEP Civics Assessment Framework need to be updated?</b>	Yes.
<b>If the framework needs to be updated, why is a revision needed?</b>	<i>The information environment has fundamentally changed.</i> Students today must navigate a digital landscape characterized by a high volume of information and increasingly automated systems that influence how civic content is produced, distributed, and encountered. As a result, the ability to evaluate civic information critically, to distinguish fact from opinion, assess the credibility of sources, recognize misleading or synthetic content, and engage in evidence-based civic reasoning, has become an essential civic competency. Updating the framework helps ensure that the assessment reflects the conditions under which citizens now access information and participate in public life.
<b>What should a revision to the framework include?</b>	A revision to the NAEP Civics Assessment Framework should preserve its core structure and civic principles while updating language, examples, and contexts to reflect contemporary civic life. Rather than introducing new content domains, revisions should clarify how existing concepts, skills, and dispositions operate in an information environment increasingly shaped by digital technologies and automated systems. Specifically, a revision should include:

	<ul style="list-style-type: none"> <li>• Contextual updates to existing definitions and examples, particularly in areas such as civil society, political communication, and citizen participation, to acknowledge how digital and algorithmic systems influence how people associate, access information, and engage in public life.</li> <li>• Explicit alignment between contemporary information environments and existing civic skills, especially intellectual skills such as evaluating evidence, assessing credibility, identifying bias, and distinguishing fact from opinion. These skills remain central but now require application in technology-mediated contexts.</li> <li>• Clear recognition of digital civic literacy as part of responsible citizenship, emphasizing students' understanding of how information is generated, distributed, and encountered, without requiring technical knowledge of specific technologies.</li> <li>• Use of modern civic scenarios in assessment contexts, ensuring that test items reflect realistic conditions under which citizens learn about issues, deliberate, and make judgments, while maintaining NAEP's neutral and nonpartisan stance.</li> <li>• Continuity with prior frameworks, so that revisions enhance relevance without altering achievement levels, reporting categories, or the fundamental constructs being measured, preserving the ability to interpret trends over time.</li> </ul>
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<b>Alignment of Testing Timing and Instruction</b>	
<b>Does the NAEP Civics Assessment Framework need to be updated?</b>	Yes
<b>If the framework needs to be updated, why is a revision needed?</b>	<p><i>Assessment timing and instructional alignment present ongoing challenges.</i></p> <p>In some states, civics assessments are administered at points in the grade sequence when students have not yet received instruction in the tested content. For example, in West Virginia, a civics test is administered during the West Virginia Studies</p>

	<p>year (8th Grade), when instruction focuses primarily on state history. This misalignment can affect the interpretability of results and raises concerns about opportunities to learn. Clarifying expectations around grade-band alignment would strengthen the assessment's validity and usefulness.</p>
<p><b>What should a revision to the framework include?</b></p>	<p><i>Guidance on assessment timing and grade-band alignment</i>  Emphasizing the importance of administering civics assessments at points when students have had appropriate instructional opportunities, thereby improving the validity and comparability of results.</p>

**Matthew M. Kelly, M. Ed., NBCT**

Coordinator  
Social Studies 6-12  
Office of Academic Support  
Division of Instruction and Support



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its commitment to constitutional knowledge while also creating space to assess civic reasoning, discourse, and participation. An assessment focused primarily on content knowledge provides an incomplete picture of civic learning. To reflect what prepares students for civic life, NAEP should more fully capture how students apply knowledge through experiential learning, evaluate information, and engage with others in addressing public issues.

Thank you for the opportunity to provide input on this important matter and for your continued commitment to strengthening civic education nationwide.

Sincerely,  
Alexander J. Adriano

**From:** [Dennis](#)  
**To:** [NAGB Queries](#)  
**Subject:** Civics Standards  
**Date:** Monday, March 9, 2026 9:55:18 AM

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Gentlemen/Ladies,

Thank you for undertaking the task of updating the Civics Standards of American Education. It is sorely needed.

In an age where reading and math proficiency nationwide are at a pathetic level, and history and civics scores are undoubtedly not far behind, maintaining high standards is more important than ever.

I urge you in the strongest possible terms to adopt civic standards that are academically rigorous and challenging. If our students do not have robust grasp of the history and government of our country, they will surely be unable to defend it. Please give serious attention to this. The future of our liberty, literally, depends on it.

Respectfully,

Dennis Applegarth  
Executive Director  
Nebraska School Board Resource Center


To: Sharyn Rosenberg, National Assessment Governing Board, Dept. of Education

From: Mitchell Berger, (comments made in personal capacity), mazruia@hotmail.com 2.14.26

**Re: Seeking Initial Public Comment Prior To Updating the Civics Assessment Framework for the National Assessment of Educational Progress (NAEP),**  
**<https://www.federalregister.gov/documents/2026/02/13/2026-02980/seeking-initial-public-comment-prior-to-updating-the-civics-assessment-framework-for-the-national>**

Dear Dr. Rosenberg: I write concerning proposed changes to the NAEP Civics Assessment Framework discussed in the above *Federal Register* notice. Specifically, I make the following suggestions and considerations:

- The framework also should discuss how other nations approach federalism/subnational governance and such concepts as preemption and the role of states as ‘laboratories of democracy.’<sup>1</sup> The specifications do state that “students also should become conversant with systems of governance in other nations as well as with the impact of world affairs on their own lives, communities, and nation”
- By the time the new Assessment Framework is completed, the current assessment (2018) will be nearly a decade old.<sup>2</sup> The Assessment should be updated periodically (e.g., every 5 years or so) given the pace of current events.
- Greater emphasis should be placed on how the US political structure was shaped by Greek, Roman, British and other antecedents.<sup>3</sup> While the current specifications do highlight the origin of the term ‘democracy,’ there is little discussion of these issues.
- There is little discussion in the current Framework of the role of the military in US political life, both for good and ill, and its governance and role in a democracy. The new Framework can highlight these issues.<sup>4</sup>
- The new framework should highlight the budget process, including the national debt and deficit.<sup>5</sup> There is little mention of this in the current specifications or framework. The new framework and specifications can highlight how federal, state, local, tribal and territorial bureaucracies are organized and operate including discussing key federal departments and agencies and how they are funded and overseen.

Sincerely,  Mitchell Berger Note/Disclosure: I am submitting these suggestions solely in my personal/private capacity. The views expressed are mine only and should not be imputed either to other individuals or to any public or private entity.

<sup>1</sup> Caliso, Rose Ann Camille and Flores, Stephanie Rose, *Federal Governments Around the World: A Comparative Perspective* (August 15, 2018). Available at SSRN: <https://ssrn.com/abstract=3256110> or <http://dx.doi.org/10.2139/ssrn.3256110>

<sup>2</sup> <https://www.nagb.gov/naep-subject-areas/civics/framework-archive/2018-civics-framework.html>;  
<https://www.nagb.gov/en/documents/publications/frameworks/civics/2010-civics-specification.pdf>

<sup>3</sup> <https://www.cato.org/cato-journal/spring/summer-2021/first-principles-what-americas-founders-learned-greeks-romans-how-shaped-our-country>; <https://billofrightsinstitute.org/essays/philosophical-influences-on-the-founders/>

<sup>4</sup> Charles J. Dunlap Jr., "The Origins of the American Military Coup of 2012," *Parameters* 40, no. 4 (2010), doi:10.55540/0031-1723.2548; <https://tnsr.org/2021/06/erosion-by-deference-civilian-control-and-generals-in-policy-making/>;  
<https://www.armyupress.army.mil/Journals/Military-Review/English-Edition-Archives/January-February-2023/Col-Todd-Schmidt/>; *Defense Primer: Legal Authorities for the Use of Military Forces*, <https://www.congress.gov/crs-product/IF10539>; *Democratic Control of Armed Forces*, 2008, [https://www.files.ethz.ch/isn/55845/17\\_bg\\_dem\\_control\\_armed\\_forces.pdf](https://www.files.ethz.ch/isn/55845/17_bg_dem_control_armed_forces.pdf)

<sup>5</sup> <https://guides.lib.berkeley.edu/USBudget>; <https://epicforamerica.org/federal-budget/the-budget-process-must-confront-the-challenges-of-today-and-tomorrow/>; <https://www.nationalpriorities.org/budget-basics/federal-budget-101/federal-budget-process/>

**From:** [Tia Costello](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Wednesday, March 25, 2026 8:00:11 PM

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Dear Chairman White,

I, like NCSS, support updating the framework and believe that it should include knowledge, skills, and dispositions that highlight the importance of media and information literacy, including evaluating sources and navigating misinformation.

NCSS underscores the importance of maintaining a broad, inclusive, and nonpartisan vision of civic education, and NCSS believes that its members, which are made up of practitioners, scholars, and state and district social studies leaders, are perfectly positioned to help lead this work and should be a part of the team that reimagines the framework and ultimately the assessment.

Sincerely,

Tia Costello  
Amesbury, MA

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Issue Date: March 17, 2026

## NAEP Civics Framework Public Comment

### Question 1: Does the NAEP Civics Assessment Framework need to be updated?

As the Vermont state social studies specialist and a state coordinator for the Center for Civic Education who has worked with both We the People: The Citizen and the Constitution and Project Citizen for ten years—along with four years of experience as a We the People teacher in North Carolina—I have seen firsthand how the civic landscape students must navigate has changed significantly since the current framework was developed in the 1990s.

An updated framework is necessary to ensure that NAEP measures the civic knowledge and competencies students need today to participate effectively in our constitutional democracy.

### Question 2: Why is a revision needed?

- **The civic information environment has undergone a profound transformation.**

Students today must navigate a civic information landscape characterized by widespread misinformation, partisan distortion, and algorithmically curated content streams for which many students do not have the skills to discern fact from fiction. The capacity to critically evaluate civic information, distinguish credible evidence from opinion or manipulation, and engage in informed, evidence-based civic reasoning has become an essential civic competency.

- **Constitutional understanding is more critical than ever.**

Applied knowledge of constitutional principles is increasingly vital for informed citizenship and an understanding of today's political landscape. Foundational concepts such as separation of powers, federalism, natural rights, the rule of law, and the responsibilities of citizenship warrant sustained instructional attention and meaningful assessment. The framework should more explicitly reinforce its commitment to cultivating deep and enduring constitutional understanding.

- **Civic knowledge and civic participation are mutually reinforcing.**

Students who apply constitutional principles within authentic participatory contexts—such as simulated congressional hearings, community problem-solving initiatives, policy research, and engagement with real governmental processes—develop deeper and more enduring civic understanding than those who encounter civic concepts only in abstract form. Long-standing programs such as *We the*



*People: The Citizen and the Constitution* and *Project Citizen* have demonstrated this relationship across all fifty states. The framework should reflect the substantial body of evidence showing that civic knowledge and civic skill development are most powerful when cultivated together

### **Question 3: What should a revision include?**

#### **• Preserve and strengthen the constitutional knowledge core.**

Any updated framework must maintain its commitment to deep knowledge of the U.S. Constitution, the Bill of Rights, the structure and functions of government, and the foundational principles of constitutional democracy. The six-unit conceptual structure of *We the People: The Citizen and the Constitution* provides a proven, time-tested framework for integrating constitutional knowledge with civic reasoning. Its guiding questions include:

- What are the philosophical and historical foundations of the American political system?
- How did the Framers create the Constitution?
- How has the Constitution been changed to further the ideals in the Declaration of Independence?
- How have constitutional values shaped American institutions and practices?
- What rights does the Bill of Rights protect?
- What are the challenges and responsibilities of citizenship in the 21st century?

This structure helped inform the original NAEP civics framework and should continue to serve as an important reference point.

#### **• Assess civic participation skills, not just knowledge recall.**

The framework should create opportunities to assess students' capacity to identify public problems, evaluate policy alternatives, engage governmental processes, and deliberate across perspectives. Programs such as *Project Citizen* and *We the People: The Citizen and the Constitution* demonstrate that these competencies can be taught and assessed at scale.

#### **• Incorporate contemporary civic content where evidence supports it.**

The newly updated fifth edition of *We the People: The Citizen and the Constitution* modernizes civic content by expanding attention to contemporary civic participation, media and information literacy in civic contexts, and the impact of technology on

democratic processes—while preserving a strong constitutional foundation. This work can serve as a useful model and resource for revising the NAEP framework.

- **Restore grade-level assessment at grades 4 and 12.**

Assessing civics only at grade 8 provides an incomplete picture of how civic knowledge develops across the K–12 continuum. Restoring assessment at additional grade levels would give educators, state policymakers, and the public far more actionable information about where civic learning is developing well and where additional support is needed.

**Follow up Question: How soon would updates take place and how will it affect the Civics Bee?**

**From:** [Elizabeth Fakova](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Wednesday, March 25, 2026 10:03:09 PM

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To whom it may concern,

At 19, I became one of the youngest We the People judges. I am currently a pre-law student at the University of Nevada, Las Vegas, graduating in May 2026, and I owe that path to the civic educators who invested in my understanding of government and politics. It is for that reason that I am asking you to invest in the next generation by updating the NAEP Civics Assessment Framework. While the core structure established in 1994, centered on civic knowledge, participatory skills, and civic dispositions, remains fundamentally sound, the civic environment students navigate today has changed dramatically. An updated framework is necessary to ensure that NAEP continues to measure the knowledge and competencies students need to effectively participate in a modern constitutional democracy.

A revision is also necessary in light of declining NAEP civics scores nationwide. These results should not be met with lowered expectations, but with a stronger, more relevant framework that reflects what true civic competence requires today. Students are now inundated with misinformation, partisan bias, and algorithm-driven content, making it essential that civic education emphasizes critical evaluation of information, evidence-based reasoning, and media literacy. At the same time, my experience with We the People has shown that constitutional understanding is not just relevant, it is essential. When students actively engage with principles like federalism, separation of powers, and the rule of law, they develop the ability to think critically about real-world issues and their role as citizens.

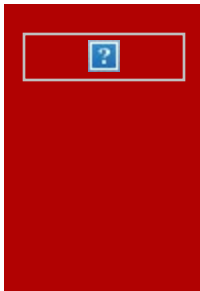
Equally important is the connection between civic knowledge and civic participation. Through simulated congressional hearings, I have seen students move beyond memorization to genuinely applying constitutional principles in high-level discussions, defending positions, and responding to questioning with depth and confidence. These experiences produce a level of civic understanding that cannot be captured through content recall alone. Programs like We the People demonstrate that when students actively engage in civic processes, their learning becomes more meaningful, rigorous, and lasting.

An updated framework should preserve and strengthen its constitutional foundation while expanding how civic competencies are assessed. This includes evaluating students' ability to engage with public issues, analyze policy options, and participate in democratic processes. Additionally, incorporating contemporary civic content, such

as the role of technology and media in democracy, will ensure relevance without sacrificing rigor. Finally, restoring assessment at grades 4 and 12 would provide a more complete picture of civic learning across the K–12 spectrum, allowing educators and policymakers to better support student development at every stage.

Updating the NAEP Civics Framework is not about replacing what works; It is about strengthening it to reflect the realities students face today. With the right revisions, NAEP can continue to serve as a meaningful measure of civic readiness and help ensure that the next generation is prepared to engage thoughtfully and responsibly in our democracy.

Kind regards,



**Elizabeth O. Fakoya**

Undergraduate Student  
Prelaw & Criminal Justice  
Greenspan College of Urban Affairs  
University of Nevada, Las Vegas

**From:** [Tracy L Gardner](#)  
**To:** [NAGB Queries](#)  
**Cc:**  
**Subject:** Public Comment on the NAEP Civics Framework Revision  
**Date:** Wednesday, February 18, 2026 1:25:00 PM

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## **Public Comment on the NAEP Civics Framework Revision**

I appreciate the opportunity to provide comment on the revision of the NAEP Civics Framework. As a Psychometrician with extensive experience in assessment design and measurement, I commend the Board's commitment to clarity of construct, nonpartisanship, and the careful delineation between knowledge and personal belief.

NAEP plays a unique and influential role in signaling national priorities. The framework should therefore ensure that the knowledge and reasoning it measures reflect a coherent understanding of American constitutional government.

I respectfully offer the following recommendations:

### **1. Clarify and Strengthen the Foundations Domain**

Within the domain addressing the foundations of the American political system, the framework would benefit from more explicit articulation of core first principles. These include:

The concept of natural or unalienable rights

The principle of consent of the governed

The purpose of government as the protection of rights

The distinction between liberty and license

The logic of limited government, including delegated and enumerated powers

These ideas are essential to understanding the architecture of the American constitutional system. Making them explicit within the framework would strengthen construct clarity and ensure consistent interpretation in item development.

### **2. Elevate Primary-Source Reasoning as an Explicit Expectation**

The framework appropriately supports the use of text-based stimuli. However, it would be beneficial to make explicit that students should be able to reason directly from foundational civic documents.

The framework should articulate expectations that students can:

- Identify and explain claims within foundational texts
- Connect textual evidence to constitutional structures such as federalism, separation of powers, and checks and balances
- Support conclusions using evidence drawn from primary sources

This emphasis would promote disciplinary rigor and align assessment with established best practices in civic literacy.

### **3. Consider Rebalancing Content Weights at Grade 8**

At grade 8 in particular, modestly increasing the weight assigned to foundational principles and constitutional design may strengthen the coherence of the assessment. A slight reallocation from comparative or international content to domains focused on constitutional structure could preserve breadth while reinforcing the central importance of American constitutionalism at this developmental stage.

### **4. Add Clear Language on Constitutional Reasoning**

Under the domain addressing government established by the Constitution, the framework could more clearly signal that students are expected to understand not only how structures function, but why they were designed as they were.

Assessment targets could include:

- The problem of majority tyranny and institutional safeguards
- Specific mechanisms of checks and balances
- Federalism, enumerated powers, and limits on authority

This would move beyond structural description toward structural reasoning, deepening cognitive demand.

### **5. Maintain the Boundary Against Assessing Personal Beliefs While Expanding Knowledge of Civic Virtue**

The framework rightly avoids assessing students' personal values or political positions. That boundary should remain firm.

At the same time, the framework can assess students' understanding of why civic dispositions such as respectful deliberation, adherence to lawful processes, civic responsibility, and informed participation are considered important in a constitutional republic. The focus should remain on knowledge and explanation rather than endorsement.

In closing, strengthening construct clarity around foundational principles, constitutional reasoning, and primary-source analysis will enhance the validity and coherence of the NAEP Civics Assessment. As the nation approaches the 250th anniversary of the Declaration of Independence, it is particularly important that students demonstrate clear understanding of the principles and structures that define American self-government.

Thank you for your careful consideration of these comments and for your stewardship of this important national assessment.

Respectfully submitted,  
Tracy Gardner, PhD

**From:** [Dan Gatley](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Friday, March 27, 2026 11:49:59 AM

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## Public Comment for the NAEP Civics Framework

Dan Gatley  
Montana State Coordinator *We the People*, Social Studies Teacher

As a state coordinator for *We the People* in Montana, I believe it is essential that an updated NAEP Civics Assessment Framework both preserves a strong constitutional foundation and incorporates relevant contemporary content. The framework should intentionally include modern elements such as media and information literacy, evolving forms of civic engagement, and the impact of technology on democratic processes, ensuring students are prepared for the realities of 21st-century citizenship while remaining grounded in core principles.

A renewed civic education framework must remain firmly anchored in the enduring principles of the United States Constitution while deepening students' understanding of how those principles function in a modern democracy. This includes a strong commitment to constitutional knowledge—such as the structure and functions of government, the protections of the Bill of Rights, and the philosophical foundations of constitutional democracy

At the same time, the framework must move beyond memorization to assess civic participation skills. Students should be able to identify public problems, evaluate policy alternatives, engage in governmental processes, and deliberate across diverse perspectives. These skills are essential for meaningful participation in democratic life and should be a central component of any updated assessment framework.

--

Dan Gatley  
Laurel High School Teacher

**From:** [Crystal Johnson](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Friday, March 27, 2026 10:20:07 AM

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Dear Chairman White,

I would like the NAEP Civics Framework to be guided by social studies professionals, such as NCSS and NCHE members and leaders. I worry that civics is too often divorced from historical understanding. To understand civic issues today, we need to understand historical context and change over time. We also need to develop source analysis and source argumentation skills to evaluate the strength and credibility of the information that we are consuming. We need students who can marshal evidence to support their ideas, and question when ideas are being presented without evidence.

Sincerely,

Crystal Johnson  
Skokie, IL

**From:** [Ryan Knowles](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Assessment Updates  
**Date:** Thursday, March 26, 2026 12:09:25 PM

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Hello,

As requested below are my thoughts regarding updating the NAEP assessment framework. I have a restricted use data license and I have worked extensively with NAEP Civics data.

Submitted to the National Assessment Governing Board

1. Does the NAEP Civics Assessment Framework need to be updated?

Yes. The NAEP Civics Framework has remained largely unchanged since 1998, continuing to organize assessment around civic knowledge, participatory skills, and civic dispositions. While this structure has provided stability and trend data, it no longer adequately reflects contemporary conditions shaping civic learning.

Most notably, national results show persistent stagnation, with only about 22% of students reaching the Proficient level in civics and little improvement over multiple decades. This suggests that the current framework is not sufficiently capturing or driving meaningful improvements in civic learning.

In addition, the civic environment has changed dramatically. Students now encounter civic information through digital media ecosystems, polarized political contexts, and increasingly localized policy constraints on instruction. A framework developed prior to these conditions cannot fully capture the competencies required for democratic participation today.

2. Why is a revision needed?

A revision is needed for three primary reasons:

A. Misalignment with Contemporary Civic Learning Contexts

The current framework emphasizes general categories of knowledge and participation but does not adequately address how civic understanding is shaped in highly mediated, polarized, and institutionally constrained environments. Research increasingly shows that civic learning is not simply an individual cognitive outcome, but the product of interactions among teachers, institutions, and broader ideological contexts.

B. Insufficient Attention to Instructional Contexts and Constraints

My research, based on large-scale multi-state teacher data, demonstrates that teacher autonomy, political pressures, and administrative constraints strongly influence whether and how civics is taught, particularly with respect to equity-focused or

controversial content. Yet NAEP currently measures student outcomes largely independent of these contextual conditions.

Without incorporating these dynamics, NAEP risks producing descriptive data without explanatory power.

### C. Conceptual Ambiguity Around Civic Dispositions and Participation

The inclusion of civic dispositions and participatory skills remains important, but these constructs are often under-theorized and inconsistently operationalized. They risk reflecting normative assumptions about “good citizenship” without adequately capturing pluralistic or competing civic frameworks.

Given increasing ideological diversity and contestation, the framework should better reflect multiple legitimate pathways of civic reasoning and engagement, rather than implicitly privileging a single model.

#### 3. What should a revision include?

A revised NAEP Civics Framework should maintain its core strengths while incorporating four key improvements:

##### 1. Integrate Contextualized Civic Learning

The framework should explicitly account for the ecology of civic instruction, including:

- Teacher autonomy and constraint
- State and local policy environments
- Community and ideological context

This could be achieved through enhanced background questionnaires and stronger integration between contextual variables and performance reporting.

##### 2. Distinguish Between Civic Knowledge, Reasoning, and Position-Taking

Rather than treating civic understanding as a unified construct, the framework should differentiate:

- Civic knowledge (institutional and constitutional understanding)
- Civic reasoning (evaluation of competing claims and evidence)
- Civic positioning (how individuals situate themselves within ideological or political debates)

This distinction would allow NAEP to better capture how students navigate disagreement, not simply what they know.

##### 3. Update Civic Content to Reflect Contemporary Information Environments

The framework should include competencies related to:

- Evaluating digital and social media sources

- Understanding misinformation and algorithmic influence
- Navigating competing truth claims in public discourse

These are now central to civic participation but are not explicitly emphasized in the current framework.

#### 4. Reframe Civic Dispositions in a Pluralistic Manner

Civic dispositions should be reconceptualized to reflect:

- Respect for disagreement
- Capacity to engage across difference
- Recognition of competing conceptions of the common good

Rather than measuring alignment with predefined norms, NAEP should assess students' ability to operate within a pluralistic democratic environment.

#### 5. Preserve Trend Measurement While Allowing Conceptual Innovation

Any revision should carefully maintain trend lines where possible, but not at the expense of conceptual relevance. A modular approach could allow new domains to be introduced alongside legacy measures.

**From:** [Levine, Peter L](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Saturday, February 28, 2026 6:06:09 PM

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Dear NAGB,

Yes, the NAEP Civics Framework should be updated. The major topics that need attention and expansion, in my opinion, are:

1. Social movements: How do groups of people organize and make change from the bottom up? What have social movements accomplished in the USA, and how have they failed? What do their participants do?
2. Civil society: What are the various kinds of nonprofit groups that exist in our society (e.g., religious congregations, voluntary associations, foundations, unions, and political parties)? How do they differ? What do they do? How can one belong?

Thank you for your consideration.

Peter Levine

Associate Dean for Faculty and Lincoln Filene Professor of Citizenship & Public Affairs  
Jonathan M. Tisch College of Civic Life, Tufts University  
Faculty appointments in Political Science (tenure home), Civic Studies (director), and  
Philosophy

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**From:** [Levy, Brett L](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Thursday, March 19, 2026 8:06:51 AM

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Thank you for inviting public comment about the NAEP Civics Framework. Given changes over recent decades, it is important that the revised framework measure young people's information literacy, sometimes referred to as media literacy. Today, all of us have access to tremendous amounts of information that shape our understanding of public issues (and other things), and this information has a tremendous impact on our ability to have informed civic participation and discourse. As we see all too often, misinformation and disinformation spread quickly and affect public sentiment on various issues. Therefore, including measures of information literacy or media literacy on NAEP Civics is an important goal.

Thank you for your consideration.

Sincerely,  
Brett Levy

\*\*\*\*\*

Brett Levy, PhD (he/him)  
Associate Professor, Department of Educational Theory and Practice  
Director, Master of Science in Secondary Education Program  
University at Albany, State University of New York

**From:** [Katy McPherson](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Wednesday, March 25, 2026 6:26:01 PM

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To Executive Director Lesley Muldoon and the National Assessment Governing Board:

Greetings. My name is Mrs. Kathleen McPherson. I am a wife and mother living in northern Nevada, a former educator holding a Master's Degree in Teacher Education, and an advocate for K12 education reform.

I thank Executive Director Muldoon and the Board for its request for public comment and recommendations regarding revisions to the Civics Assessment Framework for the National Assessment of Educational Progress.

**Yes, the NAEP Civics Assessment Framework needs to be updated.**

Revisions are needed because the present framework promotes Civics instruction which teaches American youth that America is irredeemable, that individual rights are a smokescreen for power, that free enterprise is oppression, and that speech is violence.

Recently, many Americans in various cities witnessed firsthand as thousands of youth walked off their school campuses during school hours to protest U.S. immigration law enforcement.

Below is a photo that appeared in a local Reno, Nevada news publication in February 2026. It shows high school students lining a Reno street demonstrating against the lawful deportation of immigrants who eschew U.S. law when entering our country:

Student walkouts like the one pictured above have occurred in cities all over the U.S. in February and March 2026.

I ask Executive Director Muldoon and the Board to consider these recent student demonstrations because they are evidence. They are Exhibit A that the ideas our kids are learning in their K12 classrooms promote activism over understanding, victimhood over knowledge, and grievance over deep thinking about both historical events and issues of the day.

Education writer Robert Pondiscio states that instruction which cultivates an activist impulse in children and adolescents, while neglecting to require mastery of deep background knowledge, does not produce independent civic agency in youth so much as the *appearance* of it.

(For your convenience, here is a link to Robert Pondiscio's Substack: [https://substack.com/@robertpondiscio?r=27r89s&utm\\_medium=ios&utm\\_source=profile&shareImageVariant=blur](https://substack.com/@robertpondiscio?r=27r89s&utm_medium=ios&utm_source=profile&shareImageVariant=blur))

I think Pondiscio is correct in concluding that today's Civics education teaches students how to act, but not how to judge; how to mobilize, but not how to understand. The result of such instruction is not young people exercising dignified self-government, as we would wish, but rather a kind of ill-informed "civic ventriloquism."

In other words, our nation's current Civics education assessment framework is helping to create enthusiastic child soldiers for the leftist progressive social/political cause of the week, churning out kids who are eager to enlist in someone else's army, convinced they are acting on their own.

**The current Civics assessment framework is partly to blame for this departure from foundational Civics education in K-12. It absolutely must be updated. A revision to the framework should include removal of all alignments with politicized material, including "action civics," and a refocus upon essential civics knowledge.**

I urge the Board to consider that the existing NAEP-CAF has been **politicized**, above all by aligning with "action civics"—vocational

training in progressive activism that replaces classroom civics education. The NAEP-CAF currently measures student knowledge of *intellectual skills*, *participatory skills*, *civic dispositions*, and *civic skills*. **All these phrases serve as euphemisms for action civics.**

NAEP-CAF also reveals politicization by radicalized language, such as referring to America as a *constitutional democracy* or a *democracy* rather than as a *republic*, and referring to patriotic language and symbols using the dismissive adjective *emotional*.

**The NAEP-CAF should be updated to remove all politicized language and all alignment with politicized pedagogy.**

The NAEP-CAF also **lacks essential civics focus**. Civics education should include, as primary categories, knowledge of our nation's foundational documents of liberty (e.g., the Declaration of Independence, the Constitution), as well as of their intellectual sources. It also should focus upon America's constitutional history. The NAEP-CAF should be updated to add these as primary categories of testable knowledge.

The NAEP-CAF also should be reformed to provide **assessable rigor**. The NAEP-CAF has been reduced from tests in Grade 4, Grade 8, and Grade 11 to just one test at Grade 8. That one test is not done at a scale large enough to allow for state-level disaggregation. The NAEP-CAF's baseline for proficiency also may have been substantially degraded, because it does not provide large enough samples of classical school students and home school students—whose civics facility would provide a useful baseline for proficiency.

Please give careful consideration to the following twelve specific revision recommendations for the NAEP-CAF developed by the National Association of Scholars and the Civics Alliance:

1. *Do Not Use AIR as a Contractor*: The NAGB should not entrust updating the NAEP-CAF to the American Institutes for Research (AIR). Organizations that hire AIR to take part in their social studies and civics work standardly produce products that recapitulate the flaws of the National

Council for the Social Studies' (NCSS) ideologically extreme definition of social studies, and of its College, Career, and Civic Life (C3) Framework for Social Studies State Standards, which replaces content knowledge with insubstantial and opaque “inquiry”; replaces social studies pedagogy with identity politics ideologies such as Critical Race Theory; and inserts ideologically extreme pedagogies such as Action Civics. A decision to hire AIR is tantamount to a decision to adopt the ideologically extreme structure of the *NCSS' C3 Framework*. The NAGB should not hire AIR, or in any way involve AIR, in any part of the creation or revision of the NAEP-CAF.

2. *Consider an Alternate Contracting Consortium*: The existing Civics Assessment Framework was jointly drafted by the Council of Chief State School Officers with the Center for Civic Education and the American Institutes for Research. The NAGB should consider an alternate contracting consortium, consisting (for example) of Classic Learning Initiatives, the Core Knowledge Foundation, the Hamilton School for Classical and Civic Education at the University of Florida, and Hillsdale College.

3. *Align with Alternate Standards*: The NAEP-CAF now boasts of its consistency with the Center for Civic Education's *National Standards for Civics and Government*. The NAGB should direct a new contractor to align the NAEP-CAF with better standards, such as *The Hillsdale College K-12 History & Civics Curriculum*, *Foundations of Freedom: Louisiana High School Civics*, and *American Birthright: The Civics Alliance's Model K-12 Social Studies Standards*.

4. *Consider Aligning with the U.S. Civics Test*: 25 states now align their K-12 civics instruction with the U.S. Civics test given to immigrants who wish to be naturalized. The NAGB should consider aligning tested content with the content of the U.S. Civics Test—specifically, the existing (2026) 128-question civics test.

5. *Strengthen Testing Scope*: The NAGB should request sufficient resources to allow it to restore tests for the 4th grade, the 8th grade, and the 11th grade, rather than simply retaining the 8th grade test. It should increase the frequency of the tests to be every two years. It also should increase the number of tested students to allow for significant sample sizes from 1) each

state; 2) from classical school students; and 3) from home school students. The NAGB should oversample students from smaller states, classical schools, and home schools, to ensure that it has sufficient sample sizes.

*6. Strengthen Testing Rigor:* NAGB should establish rigorous baselines for proficiency. It should do so not least by examining its classical school and home school samples to establish a properly rigorous baseline for proficiency. NAGB also should use computerized assessments to seek out and grade for especially advanced proficiency. Computer technology now allows assessments to determine fine gradations among elite performers. NAGB should determine in granular detail the elite performers on the NAEP-CAF, not least to provide useful material for civics-focused scholarship and grant programs.

*7. Remove Questions on Participatory Skills and Civic Dispositions:* The current NAEP-CAF devotes 10-15% of questions to “students’ knowledge and understanding of participatory skills”, and another 10-15% to “questions related to civic dispositions”. The NAGB should remove these categories and these questions entirely from the NAEP-CAF. To do so, NAGB should focus on reducing the content assigned to the question category “What are the roles of citizens in American democracy?”

*8. Remove Inquiry Format:* The current NAEP-CAF uses an “inquiry-based” format even to categorize Civic Knowledge, framing it in terms of five questions. These should be rephrased as five content knowledge categories—identifying categories of knowledge, not questions. The careful distribution of questions by Intellectual Skills likewise reflects education-school fussiness rather than an essential category for the NAEP-CAF. NAGB should consider whether to eliminate these requirements, if they get in the way of drafting a sensible test by subject matter.

*9. Add Categories on Primary Sources, Intellectual Influences, and Constitutional History:* The current NAEP-CAF devotes 25% of Grade 8 questions to “What are the foundations of the American political system?” This category should be increased to three categories, including America’s Foundational Documents of Liberty, Intellectual Sources for America’s Foundational Documents of Liberty (including the Bible and Protestant

political theory, Greco-Roman political thought, English law, the Enlightenment, and colonial American ideas and practice), and Constitutional History. These categories should be framed to generate questions that assess students' familiarity with and ability to analyze the foundational primary sources of America's civic inheritance. The portions of the NAEP-CAF currently assigned to Participatory Skills and Civic Dispositions should be reassigned to these categories.

10. *Confine Text-based Stimulus Materials to Historical Examples*: The current NAEP-CAF now allows text-based stimulus materials to include contemporary documents. This allows questions that align with action civics: "For example, students may be asked to take a position regarding a community planning issue after examining a map and reading about the proposed change." Text-based stimulus materials only should include historical documents, which allow no prompts for action civics.

11. *Reform Civic Participation Category*: The current category "What are the roles of citizens in American democracy?" focuses excessively on how citizens should influence government or hold government to account. While this matters, it underplays tests on how citizens can *participate* in government—as aldermen and mayors, as school board members and judges, as jurors and members of the National Guard, as policemen, firemen, and members of the Border Patrol. At least half the questions in this category should focus on different forms of civic participation in government. This category also should include questions on civil society, including assessment of knowledge of *Robert's Rules of Order*.

12. *Depoliticize Throughout*: The NAGB should ensure that the NAEP-CAF includes no politicized language or content. For example:

- Refer to the United States exclusively as a *republic*, never as a *constitutional democracy* or a *democracy*.
- Refer to *patriotic* language and symbols, not *emotional* language and symbols.
- Include no material that aligns with action civics, including *service-learning*. Carefully inspect language referring to *volunteering*, *building*

*coalitions, advocating, deliberating on public issues, holding public officials accountable, petitioning, and participating in civic and advocacy groups, to see if it euphemizes action civics.*

- Seek the best civics education rather than a “broad consensus,” since the “broad consensus” now includes dedicated proponents of politicizing civics education.
- Define *equality* exclusively as *equality of opportunity*, so as to avoid giving countenance to the oppressive ideology of *equity*.
- Craft the NAEP-CAF without worrying about *bias* or *contextual information*, since these frequently serve as euphemisms for politicized content and pedagogy.

To conclude, I’m sure I don’t have to tell you the typical American student is stunningly ignorant of U.S. history and government, with only 20% scoring “proficient” in civics and 31% scoring “below basic” on the NAEP.

This neglect of civic formation and character education would STUN the nation’s Founders, who were concerned nearly to obsession about the necessity of a virtuous citizenry capable of sustaining our infant republic.

As an advocate of K12 education reform, I can tell you many Americans with children in public schools are dissatisfied with the departure in recent years from teaching students essential civics knowledge to recruiting students into puerile activism.

American students deserve to learn their country is NOT irredeemable. Far from it.

They deserve to know America’s kids are NOT victims. Rather, agency is their birthright.

And finally, Civics instruction which seduces young people with politicized calls to “dismantle the system” fails to guide youth to the path to self-fulfillment. On the other hand, teaching kids to cherish liberty and inspiring them to pass the baton of freedom sows the seeds of hopeful purpose and

lasting meaning.

Indeed, it's how America will endure. Think about that.

Thank you.

Mrs. Kathleen McPherson, MTE  
Sparks, NV

**From:** [Robert Medrano](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Friday, March 27, 2026 11:35:45 AM

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Dear Members of the National Assessment Governing Board,

I'm a Senior Program Director at Teach Democracy, a national nonprofit focused on civic education, and a former secondary social studies teacher in California. I believe the NAEP Civics Assessment Framework should be updated.

The current NAEP Civics Assessment Framework, grounded in the 1994 *National Standards for Civics and Government*, provides an important foundation in civic knowledge and constitutional principles. However, it does not fully reflect how civic readiness is understood today. A revision is needed to further align NAEP with contemporary social studies frameworks and research on civic education.

A revised NAEP Civics Assessment Framework should incorporate inquiry-based elements from the College, Career, and Civic Life (C3) Framework. This includes assessing students' ability to develop questions, evaluate sources, use evidence to construct arguments, and apply their learning to real-world civic issues. These inquiry practices are central to how civic learning is taught and enacted in classrooms today.

In addition, the NAEP Civics Assessment Framework should reflect a multidimensional conception of civic readiness. Contemporary research emphasizes that civic readiness includes not only what individuals understand but also how they engage in civil discourse, collaborate to solve problems, navigate complex information environments, and develop a sense of civic identity and agency. Incorporating these competencies would provide a more comprehensive and accurate picture of students' readiness to participate in democratic life.

Ultimately, the NAEP Civics Assessment should measure not only what students know about democracy, but what they can do with that knowledge, and how they see themselves as participants in it.

Sincerely,  
Robert Medrano

**From:** [Jane Robbins](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Sunday, March 22, 2026 1:24:31 PM

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As NAEP creates a new civics framework, I endorse the comment submitted by the National Association of Scholars/Civics Alliance: <https://www.nas.org/blogs/article/comment-on-upcoming-naep-civics-assessment-framework-update>. For years, American students have been subjected to a uniformly negative view of their country, her institutions and history. NAEP is obligated to create structures that are objective, non-politicized, and historically accurate.

A nation that fails to imbue its young people with a love of country, despite its shortcomings, is a nation that commits suicide. The new NAEP Civics Framework should not contribute to this disheartening self-destruction.

---

Jane W. Robbins  
Tucker, GA

David C. Rose

***The American Civics Academy***

6653 Midhill Place  
Falls Church, VA 22043-1834

Governing Board  
National Assessment of Educational Progress

26 March 2026

Dear Members of Board:

I am the CEO and cofounder of ***The American Civics Academy***, a 501(c)(3) organization dedicated to improving American civics education in a substantial way. I am also an emeritus professor of economics who has published numerous scholarly articles and two Oxford University Press books, ***The Moral Foundation of Economic Behavior*** and ***Why Culture Matters Most***. My vita is also attached.

I urge the NAEP board to step back from trying to improve civics education in America by updating assessment frameworks *while treating what's presently being taught as given*. Many on the board are connected to American civics education in other ways, and I urge those members to consider sharing the ideas that follow below in those contexts as well.

American civics education is not failing because of poor pedagogy or inadequacy of assessment. It's failing because of inadequacy of content. This is true for many reasons but here I will limit my attention to just one.

The circumstances in which we now teach civics have changed dramatically. For this reason the civics education of our parents and grandparents will not work. In short, those who taught our parents and grandparents did not have to overcome the deleterious effects of a powerful reality in American K-16 education today: the *Oppression Thesis*.

Much of what is taught across nearly every academic discipline today involves content that conforms with the oppression thesis. This view contends that the rise of the West and America is largely the story of the strong getting ever better at oppressing the weak. Since the strong oppressing the weak is immoral, arguing that America's story is primarily a story of oppression is effectively making a moral argument against America.

If you think I am overstating the case, consider the highly influential *New History of Capitalism* literature, which seeks to explain the rise of capitalism across the globe as resulting primarily from American slavery. This nonsense has been thoroughly discredited by top scholars in economic history and other fields, but that hasn't curbed its influence. All the maps, biographies, historical documents, and government process simulations in the world won't cultivate pride and patriotism among students who have already come to believe that America is a bad country.

We must recognize that our parents and grandparents were taught in a time when no one could even imagine that making the moral case for America was necessary. The proposition that America was the best country on earth was viewed by the vast majority of Americans to be self-evident. Because of this, the traditional civics curriculum limits its attention to addressing the *Who, What, When, Where, and How* questions of civics, but leaves the question of *Why* America is a good country largely unaddressed.

We can answer the question of *Why* America is a good country by explaining why the rise of the West and America is largely the story of people getting ever better at cooperating over time. Students must also be taught what they need to know to understand why America's free market democracy and constitutional republic is, at its core, the most effective engine of human cooperation the world has ever known. This is why America has been able to produce the greatest level of mass human flourishing the world has ever known. This *Cooperation Thesis* is the antipode to the oppression thesis and is the crux of the moral case for America.

The oppression thesis contends that the rise of the West and America is explained by zero-sum and negative-sum activity. Its overarching narrative is driven by the tension between the oppressed and the oppressors. Power, not voluntary association, is what they claim drives the patterns of behavior we observe on a daily basis in America.

But that cannot possibly be true.

No one disputes that real incomes per capita have soared in the West and America over the last two centuries, and that the quality of life among the poor has risen the most. Yet with zero-sum and negative-sum activity posited by purveyors of the oppression thesis, societies end up with the same number of people, and the same amount, or less, of resources over time.

The cooperation thesis contends that the rise of the West and America is explained by the positive-sum activity we call cooperation. In short, alone you make 10 and alone I make 10, but cooperating together we make 26. The extra 6 is the secret to it all. It is why we freely choose to cooperate because it makes it possible for everyone to benefit at the same time. This is the only way to end up with more goods and services per person over time.

I wish I could say that with the rise of the oppression thesis we have allowed sheer nonsense to derail the great story of America. But that's not true. We have never actually explained what gave rise to the West and America, and therefore *Why* people live much better lives if they live in the West, and especially if they live in America. Purveyors of the oppression thesis have been winning an argument against an empty chair, and they have not wasted their opportunity. This is how anti-Americanism came to dominate what children learn in school about America.

All societies have a great deal of cooperation going on in them as well as a great deal of oppression. But what matters is the extent to which a society's culture and institutions support cooperation while suppressing oppression. The real story of America is the story of how America's unique history led to the evolution of culture and institutions that were particularly good at fostering a cooperative dispositions among citizens, inducing the emergence of mediating institutions to facilitate group cooperation in the private sector as described by

Tocqueville, and formal institutions to round out the requisite conditions for having truly cooperative system.

A common reaction to the above is concern about the politicization of the civics education curriculum. But the oppression thesis is clearly a means of promulgating a political position for which there is no compelling theory or evidence. There are, in contrast, very strong theoretical arguments and ample empirical evidence that the West and America were built by cooperation.

This is not a call for introducing a new ideological slant to civics education. It's a call for teaching students some basic tools from economics to allow them to understand the science of cooperation. Once that foundation is laid, students can then be taught how the evolution of American culture and institutions was driven by the benefits of more effective cooperation. Increasing cooperation is obviously the first step to more mass human flourishing. That, in a nutshell, is the path to making a broad and rigorous moral case for the American way of life.

A rising concern about those involved in the teaching of American civics is the downward trend in patriotism. This is hardly a mystery. It is precisely what one would expect from the inculcation of the oppression thesis throughout American K-16 education. This problem is no longer limited to public education. The oppression thesis is now treated as common sense in many private schools as well. This has put thoughtful teachers in a terrible dilemma. Many know that the oppression thesis is a poor explanation for the true nature of America and its rise, but they are understandably reluctant to appear to be overly political in the classroom by challenging it. What they need is a better story, one that conforms with traditional civics education content while displacing the oppression thesis. The cooperation thesis provides that better story.

It's hard for students to feel patriotic and to possess a sense of civic responsibility for a country that they've been taught is bad. But it's easy for students to feel patriotic and to possess a sense of civic responsibility if they understand what it is about America's history, culture, and institutions that makes America so cooperative in nature. From this understanding it is easy to see why America, despite its many imperfections, is good, effectively making the moral case for the American way of life.

So, how exactly would this be done? At the American Civics Academy we hope to launch a movement in civics education, from which everything else will follow. This will be done through social media, public speaking, and seminars. It will also be done by sharing our message with those, like the members of this committee, who are overseeing the teaching of American civics education. I hope the members of the committee will take a look at our website ([www.AmericanCivicsAcademy.org](http://www.AmericanCivicsAcademy.org)). For a very small investment of your time you can also watch videos 1, 2, and 3 YouTube, all of which are very short.

There is an old saying from management theory that says, "you get what you measure." There's a great deal of truth in that. I'd add "you only measure what you can measure." That was intended to remind people that some of the most important things are, in fact, immeasurable.

We often use the word “immeasurable” to convey unfathomable gravity. I submit that it is national suicide to continue to pretend that there is nothing wrong with the curricular content of American civics education and related disciplines like history and political science. The oppression thesis is actively undermining the very goals of civics education. The harm it has done, and continues to do, is indeed immeasurable.

The science of cooperation offers us a new way to teach civics that does not displace traditional civics but, instead, pumps new life into it by providing a underlying narrative that pulls the material together with a powerful connecting idea – the cooperation thesis. This idea goes to the heart of what it means to understand, appreciate, and love America, and to endeavor to live up to doing one’s part by fulfilling their civic responsibilities.

Sincerely,

David C. Rose

CEO and cofounder, *American Civics Academy*

Professor Emeritus of Economics, University of Missouri-St. Louis

Member, US Commission on Civil Rights (MAC)

**Does the NAEP Civics Assessment Framework need to be updated?**

Yes - The core structure of the 1994 framework — its focus on civic knowledge, participatory skills, and civic dispositions — remains conceptually sound. But the civic environment students navigate today has fundamentally changed since that framework was developed, and an update is necessary to ensure NAEP continues to measure the knowledge and competencies, such as media and information literacy, that matter most in the twenty-first century.

**If the framework needs to be updated, why is a revision needed?**

1. *The information environment has fundamentally changed.* Students today must navigate a digital landscape saturated with information, partisan distortion, and algorithmically curated content. The ability to evaluate civic information critically, distinguish fact from opinion, determine authentic from manufactured, and engage in evidence-based civic reasoning are now core civic competencies tied to media and information literacy.<sup>1</sup>
2. *Civic knowledge and civic participation are inseparable.* Students who apply constitutional and political knowledge in authentic participatory contexts — simulated congressional hearings, community problem-solving, policy research, and engagement with real governmental processes for example — demonstrate deeper and more durable civic understanding than those who encounter civic content only in the abstract. Many states are now implementing civics programs that require student demonstration of civics competencies such as civics seals, student-led civics projects, state level assessments, or other forms of engagement.<sup>2</sup> The framework should reflect what recent research has demonstrated in the regards to the development of civic knowledge and skill are mutually reinforcing.<sup>3</sup> Students should be able to demonstrate the connection between civic knowledge and civic participation and the value of both.
3. *Declining NAEP scores demand a rigorous response.* The appropriate answer to declining civics scores is not to lower expectations — it is to ensure the framework reflects the most current and rigorous research and understanding of what civic competence requires, and that schools have the tools to deliver it.
4. *Contemporary research-based resources have been created and should be considered.* Civic instruction and outcomes have evolved and so have the resources available. New resources include the C3 Framework, Educating for American Democracy Roadmap, AP Framework, Civic Health Index, the Six Proven Practices for Effective Civic Learning, inquiry-based and state standards, plus others. Along with the original framework research, these resources should be considered along with the National Standards for Civics and Government as the foundational documents when revising the NAEP Civics Framework.
5. *Lack of educator usability and relevancy.* The current framework is not presented in a format that is intuitive or practical for educators. Its language and structure are overly formal and academic, making it difficult for teachers who are responsible for delivering civics instruction to use it effectively. Within the framework, there are moments of clear, specific, and actionable

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<sup>1</sup> For definitions and a comprehensive list, review [Core Competencies in Civic Engagement](#).

<sup>2</sup> Since 2023, at least 23 states and DC have enacted civics legislation ([NCSL](#))

<sup>3</sup> Review Section 3 (page 4) for the [Goals of Experiential Civic Learning](#) to see the connections.

information that could be highly valuable for classroom practice. Unfortunately, these insights are often difficult to locate within the broader text.

### **What should a revision to the framework include?**

1. *Restore grade-level assessment in at least three grade levels.* Assessing only grade 8 gives an incomplete picture of how civic knowledge develops across the K–12 span. Restoring assessment at additional grade levels would give educators, state policymakers, and the public far more actionable information about where civic learning needs support.
2. *Consider assessing in grade 5 or grade 6 for a more comprehensive reflection of what students have been taught based on standards.* To ensure the assessment accurately reflects what students have actually been taught, the framework should consider administering the test in grade 5 or grade 6. Current state standards indicate that 38 out of 50 states do not begin formal instruction in U.S. history and foundational civics until grade 5 or later.<sup>4</sup> Administering the assessment at grade 4 therefore risks measuring exposure rather than learning. Testing at grade 5, at minimum, would help ensure students have been introduced to the essential content prior to assessment, resulting in more meaningful and valid data on what students truly know and are able to do.
3. *Preserve and strengthen the constitutional knowledge core.* Any updated framework must maintain its commitment to deep knowledge of the U.S. Constitution, the Bill of Rights, the structure and functions of government, and the foundational principles of constitutional democracy. General grasp of the basics of civics is still “very weak” amongst Americans so strengthening the constitutional knowledge core will reinforce the value of teaching these foundational concepts.<sup>5</sup> The challenges and responsibilities of citizenship in the 21st century need to be added to the framework which in turn will strengthen foundational knowledge.<sup>6</sup> Students should be able to recognize when governmental actions deviate from constitutional principles.
4. *Assess civic participation skills, not just civic knowledge recall.* The framework should create space for assessing students' capacity to identify public problems, evaluate policy alternatives, engage governmental processes, and deliberate across different perspectives utilizing Constitutional documents and authentic sources. Students should be able to make connections between governmental actions and constitutionality both past and present.<sup>7</sup> This focus will help bridge the gaps in content knowledge due to the lack of national content alignment.
5. *Incorporate contemporary civic content where the evidence supports it.* This includes authentic resources that assess students' media and information literacy skills. While asking students to analyze a political cartoon is relevant for the U.S. History framework, they should be analyzing

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<sup>4</sup> Data was collected by using the [AIR Social Studies Map](#) and searching state websites when data was not available.

<sup>5</sup> [This article](#) relies on the survey data by the Annenberg Public Policy Center.

<sup>6</sup> The non-comprehensive list of 21st Century Skills that was reference was compiled by Panorama Education.

<sup>7</sup> Areas of learning when considering civics can be found on page 4 of the [Core Competencies of Civic Learning](#).

information that they are presented with regularly - posts on social media, memes, influencer content, content found in group chats, and short form videos.<sup>8</sup>

6. *State level reporting.* Providing state level reports of the assessment results will incentivize the schools and states to focus on NAEP Civics Assessment while also giving states data to develop tools for educators that will help support the test. Even for small states, regional data could support the above. Data aggregated at this level identify achievement gaps, guide policy decisions, inform resource allocation, and monitor long-term educational trends.<sup>9</sup>
7. *Format to make the framework educator friendly, usable beyond just the assessment.* To build broad support for the framework, it should be written in language that is relatable, accessible, and easy to reference in day-to-day instructional planning. Clear action items, expectations, and examples would help the framework function not only as an assessment guide but also as an instructional resource that educators can confidently rely on.<sup>10</sup>
8. *Include diverse civic voices.* Authentic sources should reflect the full range of communities in the United States and represent diverse civic voices. The NAEP Civics Assessment should explicitly include Tribal Governments as a level of government, alongside federal, state, and local governments, and recognize Tribal Nation treaties as legally binding agreements under the Article VI Supremacy Clause of the U.S. Constitution. Students should have opportunities to examine the multiple ways individuals and groups express their civic voices and to use their own civic identities to make meaningful connections between civic knowledge and civic participation.

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<sup>8</sup> Find the non-exhaustive list of the most commonly cited 21st century skills through [Panorama Education](#).

<sup>9</sup> [NAEP](#) highlights that purpose of providing state specific data for the other NAEP tests.

<sup>10</sup> To see recommendations of what educators facing programs should include, review the [Curriculum Guidelines for Social Studies Teaching and Learning](#).

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**From:** [Anna Saavedra](#)  
**To:** [NAGB Queries](#)  
**Cc:** [Ismar Volić](#)  
**Subject:** NAEP Civics Framework  
**Date:** Friday, March 6, 2026 6:53:13 AM

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To the NAGB Governing Board:

My name is Anna Saavedra--I am an education researcher at the University of Southern California with [expertise in civics](#) and the Director of the (new) [Center for Civic Society](#) at the University of Southern California (USC). My colleague [Ismar Volić](#) (co-submitting this comment and copied) is a professor of mathematics at Wellesley College and the Founding Director of the [Institute for Mathematics and Democracy](#).

Together we believe the NAEP Civics Assessment Framework would benefit from inclusion of concepts ~~related to the math~~ mathematical foundations of democracy. Here we elaborate on what we mean and why we make this recommendation.

~~Quantitative~~ literacy is one of the necessary ingredients for economic success. Strong mathematical skills and ability to think analytically and critically about quantitative phenomena is crucial for individual workers and the workforce more broadly. The K-12 educational system in the United States recognizes this fact and prioritizes development of students' quantitative literacy. As well, civic knowledge and skills are critical to functioning as responsible members of democracy. Before they turn 18 and can vote, students need to learn about how the government works and how to engage, for example through registering to vote and being informed voters and deliberating about their perspectives with others.

At the intersection of quantitative and civic literacy, many of our electoral and legislative systems are fundamentally mathematical. Math informs how to collect and tally votes, allocate legislative seats, decide sizes of legislatures, and draw district maps—and math can illuminate which methods for implementing these tasks more and less sound, legal, and fair. In civic life, data, algorithms, and statistics increasingly drive decisions. Without the ability to understand numbers and their implications, people are easily disenfranchised and manipulated. This is especially true at a time where mathematically infused discussions of practices like ranked choice voting and gerrymandering increasingly appear at the forefront of the public political discourse.

The challenge we seek to address through the inclusion of mathematical foundations of democracy in the NAEP Civics Framework revision is that U.S. K-12 schools largely do not address concepts such as approaches to voting, re-districting, statistical models for identifying and engaging likely voters, gerrymandering, the Electoral College, or the analysis of data describing political systems, public opinion, and political behavior.

With necessary supports for teachers, these concepts could be taught through math and/or civics curriculum in a way that is not additive to already extensive learning standards. Math teachers could use these topics as relevant applied examples for developing students' math skills and conceptual understanding. Likewise, civics teachers could integrate into their instruction the basic mathematical principles substantiating key features of U.S. democracy. Without focus on developing students' conceptual and mathematical understanding of fundamentally mathematical features of U.S. democracy during their K-12 education, the U.S. cannot have a population that is fully capable of effectively participating in democracy.

Along with other activities (e.g., inclusion of relevant [standards-aligned](#) topics in math and ELA assessments, provision of [supports](#) for teachers), such a change to the NAEP Civics assessment would

increase awareness and education about the mathematical foundations of democracy. Our recommendation is timely, with implications for educators, students, researchers, and the public at large.

Thank you for your time and consideration,  
Anna Saavedra  
Ismar Volic

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Dr. Anna Rosefsky Saavedra | Director, Center for Civic Society | Co-Director, [Center for Applied Research in Education](#) | [USC Schaeffer Institute for Public Policy & Government Service](#) | University of Southern California

**From:** [Anton Schulzki](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Wednesday, March 25, 2026 5:10:07 PM

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Dear Chairman White,

As a former president and interim executive director of the National Council for the Social Studies, I feel that it is necessary for National Assessment Governing Body to update the NAEP Civics assessment. My 41 years as a social studies teacher as well as experience working with NAEP, has led me to understand that the civics education is vital for our democracy. Students need to understand why their voices and their actions are critical to understanding civic engagement.

I believe that our students should be taught that civics include knowledge, skills, and dispositions that highlight the importance of media and information literacy, including evaluating sources and navigating misinformation. Additionally, I believe that any civics class should foster that inclusion of real-world civic engagement, the importance of connecting civics with history, geography, and economics, and most importantly, that all civics classes maintain a broad, inclusive, and nonpartisan vision of civic education.

I would hope that the NAEP Civics framework would reflect those points.

I have been fortunate to have taught civics classes that allowed for student voice and action to be an essential part of the class, and indeed several former students have gone on to work in all aspects of government as well as the military and the private sector.

I hope that both NAGB and NAEP will consider those points

Sincerely,

Anton Schulzki  
Colorado Springs, CO

**From:** [Sandra Schwarzkopf](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Thursday, March 26, 2026 2:58:07 PM

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Dear Chairman White:

Thank you for this opportunity to submit public comment on the revision of the NAEP Civics Framework. As an educator committed to preparing students for informed and engaged civic life, I write to make a focused and urgent argument: data literacy must be recognized as a distinct and essential civic skill in any updated framework; not as a subset of media literacy, but as its own foundational competency.

Much of the current conversation around 21st-century civics education centers on media literacy — the ability to evaluate sources, identify credible outlets, and detect misinformation. This is important work. But data literacy is something different, and the distinction matters enormously.

Media literacy asks: Where did this come from, and can I trust the source?  
Data literacy asks: What does this evidence actually prove and what does it not prove?

These are not the same question. A student can correctly identify a peer-reviewed study from a credible institution and still misread what its findings mean, ignore what population it sampled, overlook what variables were omitted, or fail to ask who funded the research and why. Source evaluation is the beginning of critical thinking, not its completion. Data literacy is what comes next, and it is what civic participation actually demands.

We live in an era in which policy debates, news cycles, political campaigns, and increasingly AI-generated content are built on numbers: statistics are weaponized, graphs are manipulated, and percentages are stripped of context. A citizenry that can name a credible source but cannot interrogate the data that source presents is still a citizenry vulnerable to manipulation. Policymakers, advocates, and bad actors alike know that numbers carry authority, and students who have never been inside the process of gathering, analyzing, and questioning data are not equipped to push back.

The solution is not simply more media literacy instruction. It is civic education that places students inside the data process itself.

When students choose a real community issue, form a research question, collect primary data through surveys, interviews, and observation, analyze that data for

patterns, contradictions, and gaps, and then present evidence-based arguments to genuine civic audiences, such as school boards, city councils, community organizations, something transformative happens. They stop being consumers of civic information and become producers of it. They learn firsthand that numbers require context, that datasets have edges, that representation matters, and that what is missing from data is often as important as what is included. They develop the statistical reasoning to ask: What does this number actually prove? Who is counted here, and who is not?

This kind of learning also builds something media literacy alone cannot: a natural, durable skepticism toward data encountered in the wild. Students who have been inside the research process, struggled to get a clean sample, and noticed the limits of their own surveys, approach the data claims of news outlets, political campaigns, and AI-generated content with a fundamentally different critical instinct. They know how data can mislead because they have lived it.

This is not a theoretical argument. Place-based civic education models that embed data literacy in real community inquiry demonstrate that when students see their evidence-based work influence real decisions, they begin to understand themselves as participants in democracy rather than observers of it. That shift in identity is precisely what civics education should be trying to produce.

For these reasons, I strongly urge the National Assessment Governing Board to:

1. Explicitly distinguish data literacy from media literacy in the updated framework, recognizing each as a distinct and necessary civic competency.
2. Include data literacy standards that go beyond source evaluation to encompass statistical reasoning, evidence-based argumentation, and the ability to identify what data omits as well as what it includes.
3. Assess students' capacity to construct civic arguments from evidence, not merely to identify whether a source is credible.
4. Affirm real-world civic engagement and inquiry-based project learning as legitimate expressions of civic knowledge, not peripheral enrichment activities.
5. Connect civics standards with the skills students will need to engage with data in economics, history, geography, and the sciences - disciplines that share the same evidentiary habits of mind.

The NAEP framework signals what we value. If we do not name data literacy as a core civic skill, we risk graduating generations of students who can scroll past a fake headline but cannot question a real statistic, and in a democracy saturated with data, that gap is dangerous.

We should all support the goal of a broad, inclusive, and nonpartisan vision of civic education. Teaching students to ask what evidence proves, who is represented in

data, and what a number actually means is not a partisan act. It is the most foundational act of democratic preparation we can offer.

Thank you for your consideration of these comments.

Respectfully submitted,

Sandra Schwarzkopf  
Newburyport, MA

**From:** [Rebecca Tinder](#)  
**To:** [NAGB Queries](#)  
**Subject:** NAEP Civics Framework  
**Date:** Wednesday, March 18, 2026 3:01:00 PM

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### **Question 1: Does the NAEP Civics Assessment Framework need to be updated? Yes.**

The West Virginia Civic Education Foundation houses both the We the People and Project Citizen Programs in West Virginia, WV has been implementing the programs for decades. I have seen firsthand how the civic landscape students must navigate has changed significantly since the current framework was developed in the 1990s. An updated framework is important to ensure NAEP measures both civic knowledge and competencies that students need today, in the 21st century, to participate in our constitutional democracy. Just as history and how it is taught has changed, so, too must the NAEP assessment framework be updated.

### **Question 2: Why is a revision needed?**

The information environment has fundamentally changed. Students today must navigate a civic information landscape saturated with misinformation, partisan distortion, and algorithmically curated content. The ability to evaluate civic information critically, distinguish fact from opinion, and engage in evidence-based civic reasoning is now a core civic competency that must be taught and tested. To aid with the volume and breadth of information available for consumption, we have utilized the media literacy lessons in both We the People and Project Citizen, opening the eyes of students to subtle differences in how the same information may be presented, highlighting the need to understand who is providing the information and what is to be gleaned.

Constitutional understanding is vital. And applied civic knowledge of constitutional principles is more important than ever. Topics such as separation of powers, federalism, natural rights, the rule of law, and the responsibilities of citizenship deserve ample instructional time and assessment. The framework should strengthen its commitment to foundational constitutional knowledge.

Civic knowledge and civic participation are inseparable. Students who apply constitutional knowledge in authentic participatory contexts — through simulated congressional hearings, community problem-solving, policy research, and engagement with real governmental processes — demonstrate deeper and more durable civic understanding than those who encounter civic content only in the abstract. The research shows that the We the People and Project Citizen programs demonstrate this and have for decades. The framework should reflect what we have learned about how the development of civic knowledge and skill are mutually reinforcing.

Declining NAEP scores demand a rigorous response, one that causes a reversal of the trend, not just a plateau. The appropriate answer to declining civics scores is not to lower expectations — it is to ensure the framework reflects the most current and rigorous research and understanding of what civic competence requires, and that schools have the tools to deliver it.

**Question 3: What should a revision include? Knowledge, participation, and assessment.**

- a. Preserve and strengthen the constitutional **knowledge** core. Any updated framework must maintain its commitment to deep knowledge of the U.S. Constitution, the Bill of Rights, the structure and functions of government, and the foundational principles of constitutional democracy. The research-based, six-unit conceptual structure of *We the People: The Citizen and the Constitution* offers a proven, time-tested framework for integrating constitutional knowledge with civic reasoning: What are the philosophical and historical foundations of the American political system? How did the Framers create the Constitution? How has the Constitution been changed to further the ideals in the Declaration of Independence? How have constitutional values shaped American institutions and practices? What rights does the Bill of Rights protect? What are the challenges and responsibilities of citizenship in the 21st century? This structure informed the original NAEP framework and should be a baseline reference point.
- b. Assess civic **participation** skills, not just civic knowledge recall. The framework should create space for assessing students' capacity to identify public problems, evaluate policy alternatives, engage governmental processes, and deliberate across different perspectives. Research shows that *Project Citizen* and *We the People* have shown this can be done at scale. We have found that extending instruction to include participation increases not just engagement, but knowledge and knowledge retention. This is reflected in the mock congressional hearings implemented in *We the People* classrooms and the showcase presentations in *Project Citizen* classrooms. Students have completed research, written prepared remarks on their topic and respond to questions from outside “judges” ... without notes! We are told by alums of the programs that they have never, and will never forget the experiences of participating in these projects. These students remain engaged and even assist in preparing teachers and students in West Virginia to do the same.
- c. Conduct grade-level **assessment** at grades 4 or 5, and 12. Assessing only grade 8 gives an incomplete picture of how civic knowledge develops across the K–12 span. Restoring assessment at additional grade levels would give educators, state policymakers, and the public far more actionable information about where civic learning needs support. Whether we like it or not, what is tested is taught. Having additional intervals of assessment is key to improving civic knowledge and engagement.

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