CENTER FOR REGULATORY FREEDOM
PROJECT OF CPAC FOUNDATION

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M E M O R A N D U M

To:	**Hon. Markwayne Mullin, Secretary-Designee, Department of Homeland Security** **Hon. Joseph B. Edlow, Director, US Citizenship and Immigrations Services**
From:	**Andrew Langer, Director, Center for Regulatory Freedom, CPAC Foundation**
Date:	**March 9, 2026**
Re:	**Department of Homeland Security, US Citizenship and Immigration Services (USCIS) Agency Information Collection Activities; Extension, Without Change, of a Currently Approved Collection: Application for Free Training for Civics and Citizenship Teachers of Adults; Civics and Citizenship Toolkit, Docket #USCIS-2011-0001, Fed. Reg. 2026-00045, Published January 7, 2026**

Below are comments of the American Conservative Union Foundation's (d/b/a. Conservative Political Action Coalition Foundation) (hereinafter "CPAC Foundation") Center for Regulatory Freedom (hereinafter "CRF"), in response to the Department of Homeland Security US Citizenship and Immigration Services (USCIS) Agency Information Collection Activities; Extension, Without Change, of a Currently Approved Collection: Application for Free Training for Civics and Citizenship Teachers of Adults; Civics and Citizenship Toolkit, Docket #USCIS-2011-0001, Fed. Reg. 2026-00045, published January 7, 2026.

CRF is a project of the CPAC Foundation, a non-profit, non-partisan 501(c)(3) research and education foundation. Our mission is to inject a common-sense perspective into the regulatory process, to ensure that the risks and costs of regulations are fully based on sound scientific and economic evidence, and to ensure that the voices, interests, and freedoms of Americans, and especially of small businesses, are fully represented in the regulatory process and debates. Finally, we work to ensure that regulatory proposals address real problems, that the proposals serve to ameliorate those problems, and, perhaps most importantly, that those proposals do not, in fact, make public policy problems worse.

The Center for Regulatory Freedom appreciates the opportunity to provide comments regarding the U.S. Citizenship and Immigration Services (USCIS) proposal to extend, without change, the information collection associated with registration for civics and citizenship training and requests for the Civics and Citizenship Toolkit. Programs that support the teaching of American civics to prospective citizens serve an important function within the broader framework of the naturalization process. They help ensure that individuals who choose to become Americans understand the constitutional system they are joining and the civic traditions they inherit upon taking the oath of citizenship.

For this reason, while the present notice concerns a relatively narrow administrative matter—registration forms and associated paperwork—it nevertheless touches on a program whose broader civic implications warrant reflection. As the United States approaches the 250th anniversary of the Declaration of Independence, the moment provides a fitting opportunity to reiterate the importance of civics education that accurately conveys the principles that have sustained the American constitutional order for nearly two and a half centuries.

The approaching semiquincentennial of the United States should inform how federal institutions think about citizenship education. In July 2026, Americans will commemorate 250 years since the adoption of the Declaration of Independence, the document that articulated the philosophical foundations of the American experiment in self-government. The anniversary represents more than a historical milestone; it is an opportunity to reaffirm the principles that gave rise to the American republic and that continue to sustain it today. Programs that introduce immigrants to the American political tradition should therefore be attentive to this broader civic moment. While the toolkit and associated training programs are primarily designed to help applicants prepare for the naturalization test, they also serve a larger purpose: transmitting an understanding of the political ideas that define American citizenship. As USCIS administers and renews the tools that support this educational process, it should ensure that the materials available to instructors clearly convey the principles of the American founding and the enduring importance of those principles to the country's continued stability and success.

Central among those principles is the concept of natural rights. The Declaration of Independence famously asserts that all persons are endowed with certain unalienable rights, among them life, liberty, and the pursuit of happiness. This articulation of natural rights established the philosophical basis for American government and continues to shape the country's constitutional tradition. Citizenship education should ensure that prospective Americans understand that the United States was founded on the idea that government exists to secure preexisting rights rather than to grant them. This understanding distinguishes the American political tradition from many other systems of governance in which rights are treated as privileges conferred by the state. For new citizens, learning that American government is structured around the protection of natural rights provides an essential framework for understanding the nation's laws, institutions, and civic expectations. The Civics and Citizenship Toolkit offers a valuable opportunity to reinforce this foundational idea, ensuring that those preparing for naturalization encounter the intellectual heritage that underlies the Constitution and the broader American legal order.

Equally important to the American system is the structure of divided government established by the Constitution. The founders recognized that political power, if concentrated, poses risks to liberty. In response, they created a federal system in which authority is divided between national and state governments, and further separated among the legislative, executive, and judicial branches. This structure of limited and distributed authority serves as a safeguard against tyranny and as a mechanism for preserving individual freedom. Citizenship education should therefore

highlight not only the existence of these institutions but also the reasoning behind them. Prospective citizens should understand why the Constitution distributes power across multiple branches and levels of government and how this design promotes accountability, stability, and liberty. When instructors present the architecture of American governance in this way, they help new citizens appreciate the practical and philosophical logic that has guided American constitutional development for generations.

Closely related to this system of divided authority is the principle of separated powers and checks and balances. The Constitution does not merely assign different responsibilities to different branches of government; it creates a system in which each branch possesses the ability to check the others. This design ensures that no single institution can exercise unchecked power, and it encourages cooperation and deliberation in the formulation of public policy. For individuals preparing to become citizens, understanding this system is essential to grasping how American governance operates in practice. Civic education that emphasizes the role of checks and balances helps new Americans understand why legislative debate, judicial review, and executive accountability are integral components of the American system. By reinforcing this institutional framework, citizenship instruction can cultivate a deeper appreciation for the constitutional safeguards that protect liberty and maintain democratic stability.

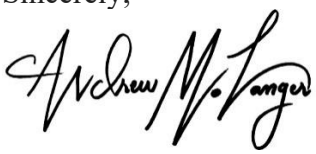
Another important dimension of citizenship education is the recognition that civic knowledge contributes directly to the long-term viability of the republic. The American constitutional system relies not only on institutions but also on an informed citizenry capable of understanding and participating in the political process. From the earliest days of the republic, American leaders have emphasized the connection between civic education and self-government. Individuals who become citizens through the naturalization process join a political community whose success depends on the informed engagement of its members. The Civics and Citizenship Toolkit therefore serves a role that extends beyond exam preparation. By providing educators with materials that explain American history, government, and civic traditions, it contributes to the broader project of cultivating citizens who understand the responsibilities associated with their new status. Ensuring that these materials clearly communicate the principles of American constitutionalism strengthens the civic foundations upon which the nation's democratic institutions depend.

In light of these considerations, USCIS should continue to ensure that the Civics and Citizenship Toolkit and associated training programs emphasize the historical and constitutional foundations of the American system. While the materials are primarily designed to assist instructors in preparing students for the naturalization exam, they also serve as an introduction to the nation's civic heritage. As the United States approaches its 250th anniversary, this educational mission takes on added significance. The semiquincentennial will prompt renewed national reflection on the ideas that gave birth to the American republic and on the institutions that have preserved it through periods of challenge and change. Citizenship education programs administered or supported by USCIS provide an opportunity to share that heritage with individuals who have chosen to become part of the American political community. Ensuring that the materials associated with these programs convey the principles of natural rights, limited government, and constitutional structure will help reinforce the civic understanding that underpins the nation's democratic traditions.

For these reasons, the Center for Regulatory Freedom supports the continuation of the information collection associated with registration for civics training and requests for the Civics and Citizenship Toolkit. The administrative burden associated with these forms appears modest,

and the underlying program serves an important role in preparing prospective citizens to understand the American system of government. As USCIS continues to administer this program, the agency should take the opportunity presented by the nation's approaching 250th anniversary to reaffirm the foundational principles of American constitutionalism within its educational materials. By emphasizing natural rights, the structure of divided government, and the system of separated powers and checks and balances, citizenship education can help ensure that new Americans understand not only how the nation's institutions function, but also why they were designed as they were. In doing so, these programs will contribute to the continued vitality of the American republic and to the preservation of the constitutional system that has sustained it for nearly two and a half centuries.

Sincerely,



Andrew M. Langer
Director
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