



**Testimony to the Kentucky Legislature's Administrative Regulation Review Subcommittee
on 704 KAR 8:060 Adopting Social Studies Standards Dated April 2019**

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May 14, 2019

Mr. Chairman and Members of the Committee:

I am Richard Innes, and I reside in Villa Hills, Kentucky. I also serve in a voluntary role as the Staff Education Analyst at the Bluegrass Institute for Public Policy Solutions.

I would like to address serious deficiencies with the revision to 704 KAR 8:060 and the revised social studies standards this regulation would incorporate by reference. I believe these standards are highly problematic, so I urge the Administrative Regulations Review Subcommittee to find both the standards and their adopting regulation deficient and to send this material back to the KBE for more work.

A brief overview of the problems

In general, the Revised Standards, as they will be referred to in my following comments, excessively focus on process activities while coverage of a truly alarming amount of factual content every Kentucky student should know is clearly deficient. As a result, the standards don't provide anything close to adequate guidance for what our students should know and be able to do when they complete their studies. The Revised Standards thus provide only deficient information to teachers, test writers and, most importantly, our students.

Deficiencies in the Revised Standards are evident even at a most basic level of inspection. Per the National Council for the Social Studies and even the Kentucky Department of Education, social studies include at least 13 separate disciplines such as "History," "Civics," "Law," "Geography," "Religion" and "Sociology." But, the Revised Standards only discuss four, limited "Strands" as the focus of Kentucky's new Revised Standards. The other nine strands are unmentioned.

On a more detailed level, history is astonishingly depersonalized in the Revised Standards. There's no mention of numerous key historical figures every Kentucky child should learn about. The astonishing omissions include many US presidents such as John Adams, Abraham Lincoln and both Franklin D.

Roosevelt and Theodore Roosevelt and extend to other extremely important individuals such as Dr. Martin Luther King, Jr. Important inventors like Alexander Graham Bell and Thomas Edison and other major players in the important story of American exceptionalism are massively missing, as well.

A great deal of other important content also goes unlisted. Coverage of many key topics in geography, for example – even such extremely basic material as ensuring our students learn that our earth has a North and South Pole and an Equator – is totally omitted.

There are legal issues, as well.

One notable problem involves the general lack of appreciation of the responsibilities of Kentucky's School-Based Decision-Making Councils (SBDM) in relationship to the standards. Unfortunately, a last-minute, Band-Aid attempt to fix this SBDM oversight just made things more deficient and confusing by citing the wrong statute concerning the SBDM's authority and responsibility for the creation of social studies curriculum from the standards.

The SBDM situation creates questions about whether the writers of the standards really understand how curriculum is developed in Kentucky.

This situation also raises questions about whether or not the standards writers understand that a primary audience for their product is each individual school council and that resources and knowledge are more limited at that organizational level.

There are additional concerns about the age-appropriateness of some material. I briefly compared the Revised Standards to social studies standards from two states that are highly regarded for coverage of history: Massachusetts and Indiana. To be sure, it wasn't hard to find examples of things specifically included in the standards from those two states that go completely unmentioned in the Revised Standards. However, even when subjects are covered in the Kentucky Revised Standards, they tend to be introduced to students several grades later than is typical in Massachusetts and Indiana.

Quite simply, the Revised Standards are a recipe for Kentucky's children to be left behind while teachers and test writers are forced to make far too many assumptions about what's in and what's out.

Even worse, the vague nature of the Revised Standards opens the door wide for yet another round of test-driven instruction in Kentucky's classrooms. Test writers are left largely on their own to determine exactly what should be covered and how good a performance from each student will be good enough. Under these conditions, it won't take long for the Revised Standards to become essentially meaningless as teachers instead take their cues from the types of questions they see on the state assessments.

With that overview complete, let me examine the issues in more detail.

Legal issues

When considering the Revised Standards, it must be kept in mind that a body of law indicates material not in the approved Kentucky standards is not allowed on state assessments.

This legal restriction is made very clear in Senate Bill 1 from the Kentucky 2017 Regular Legislative Session, which discusses the legal impact of standards approved by the state Board of Education on the state's assessments. The law specifically stipulates:

***"The statewide assessments shall not include any academic standards not approved by the board under subsection (2) of this section."*¹**

As a note, this wise provision in Kentucky law would be supported by experts such as Daniel Walker Howe, Anders Lewis and Bill Donovan, who write in their 2017 report, "Laboratories of Democracy: How States Get Excellent K-12 U.S. History Standards":

***"...standards should be detailed and specific. State history tests...must be based directly on standards that leave no room for ambiguity. Teachers and students should not have to guess what would be on a state history test...."*²**

Thus, both common sense and Kentucky law specify that if it isn't in the standards, Kentucky can't put it in state assessments. Guessing and assumptions are not acceptable.

So, it's obvious that the state's standards must be fairly complete if they are to provide a suitable, unambiguous and legally sufficient basis for the state's assessments. Vague standards that force educators and test creators to guess about what is and is not included are a recipe for trouble.

Note: Senate Bill 1 actually formalizes a much-longer-existing body of law concerning the requirement to provide notice about what's fair game on state assessments. See the Kentucky Legislative Research Commission's (LRC) 1995 report, "A Review of the Measurement Quality of the Kentucky Instructional Results Information System,"³ for more information regarding providing appropriate notice about what's in an assessment. The discussion begins on Page A-4 of the LRC's document.

Due to a massive lack of detail, the final version of the Revised Standards does not honor this legal requirement.

Aside from the impacts of the standards on assessment, other legal issues are present in the Revised Standards. A major problem is that the standards seem to have been created without an appreciation of the importance and authority of the SBDM councils in relationship to standards and the resulting curriculum.

Repeated comments were submitted to the standards creation team during the creation process that councils needed much more consideration. However, it was only very late in the process, at the time of the creation of the Statement of Consideration, that there was begrudging admission that such coverage was in fact needed. Nevertheless, the Statement of Consideration's Band-Aid fix regarding SBDM councils actually made things worse. The Statement of Consideration says:

"However, based on feedback provided, the section entitled Translating the Standards into Curriculum will be modified to provide greater clarity on the role of the SBDM in implementing the proposed KAS for Social Studies. The original text in the document stated 'local schools and districts choose to meet those minimum required standards using a locally adopted curriculum.' The agency concurs with the commenter that this statement may need additional clarity; therefore, the agency will add 'local schools and districts choose to meet those

minimum required standards using a locally adopted curriculum according to KRS 158.6453, which outlines the SBDM's role in determining curriculum.”

The major problem here is that KRS 158.6453 does not deal with school council responsibilities regarding the social studies curriculum. KRS 158.6453 only discusses council responsibilities in the single area of writing.

The actual guiding language regarding school council responsibilities for curriculum in general is found in KRS 160.345 (2)(i). The fact that school councils control curriculum under the authority of KRS 160.345 is further supported by this very direct explanatory comment found in the 2018 Kentucky School Laws Annotated edition on Page 872:

“School council has the authority to determine the school curriculum....”

Thus, the Revised Standards remain deficient regarding the consideration and discussion of the legal requirements involving school councils and social studies.

The Revised Standards present other legal issues, as well. Table 1 summarizes some of those legal issues.

Table 1	
Potential Statutory/Legal Issues in Kentucky's Revised Social Studies Standards	
Page(s) in the Standards	Problem
7 - 9	In general, the discussion of pertinent regulations for social studies on Pages 7 to 9 in the Revised Standards completely omits a most important statute, KRS 160.345. KRS 160.345 should be included as it adds broad, additional requirement to include the SBDM councils in many of the curriculum development actions required by the statutes that are listed in the Revised Standards on Pages 7 to 9. Omission of this critical statute and the general lack of coverage of SBDM council responsibilities in regard to the Revised Standards create an impression that the Revised Standards were written without consideration of the needs of the SBDM councils. Regardless, the councils are a major audience for the standards, and council needs have to be extensively considered in any Kentucky academic standards package.
8	House Bill 128, Kentucky 2018 Regular Legislative Session, requires instruction about the Holocaust and other cases of genocide. This legal requirement is pointed out in the beginning section of the Revised Standards. However, the terms “Holocaust” and “genocide” appear nowhere else in the document. In what grade(s) will each school cover this mandatory information? When does this subject become fair game for assessment? Because no grade(s) for coverage are ever specified, it is likely there will be haphazard coverage across Kentucky. Even worse, coverage of the material might never happen at all because teachers might assume their colleagues at other grade levels are dealing with the requirement.

Table 1 Potential Statutory/Legal Issues in Kentucky's Revised Social Studies Standards	
Page(s) in the Standards	Problem
8	In the discussion regarding the instruction students receive about voting requirements related to KRS 158.6450, the Revised Standards say: <i>A school may provide this information through classroom activities, written materials, electronic communication, Internet resources, participation in mock elections and other methods identified by the principal after consulting with teachers.</i> However, as previously noted, KRS 160.345 additionally indicates that school councils are required to adopt policies regarding procedures consistent with local school board policy for determining alignment with state standards. The Revised Standards should point to this <u>additional</u> legal requirement in a way that insures this important educational activity is properly developed. Failing to advise educators that an additional legal requirement aside from KRS 158.6450 pertains could result in violations of Kentucky's SBDM law by school personnel.
8-9	The KRS 158.075 statutory cite that requires a Veterans Day observance in public schools correctly mentions the principal is ultimately responsible. Unmentioned, however, is the fact that under KRS 160.345 the school council is probably required to advise the principal because this is implementation of standards, as well.

To summarize on the legal issues surrounding 704 KAR 8:060, problems, such as an incorrect citation of law, indicate writers of the Revised Standards lack understanding of the requirements of Kentucky's school-based decision-making statutes, a troubling misunderstanding that implies the writers don't understand the key role of a major audience for their standards. Did the creators of the Revised Standards appreciate the fact that the ultimate responsibility to create supporting curriculum for those standards normally is placed way down at the school level where resources are more limited and extra guidance in the form of a far more complete set of standards would be appropriate?

Also, it appears the writers never have understood the implications of the standards as the notice document for what can appear on state assessments. In the current climate where state assessments in general are coming under increasing attack, that deficiency could lead to a situation where the expensive assessment program might eventually be challenged and found illegal. That would be an expensive and unfortunate loss for the commonwealth.

Omissions of basic social studies content are massive

Equally significant as the legal issues are massive omissions in the Revised Standards of important, very basic core content every Kentucky child should learn.

The standards send a message that process trumps content. This is an especially damaging message considering research increasingly shows that content knowledge in social studies is as crucial for basic reading proficiency as it is for true social studies understanding.⁵

Omissions in the Revised Standards are painfully obvious even at a very basic level. The “Design Considerations” found on Page 11 in the Revised Standards indicate social studies has only four disciplinary strands: civics, geography, economics and history.

That very limited set of strands does not agree with mainstream definitions for the social studies. As summarized in Table 2, even the Kentucky Department of Education’s (KDE) own web site page for social studies currently indicates many more disciplinary strands pertain, including, in addition to the four just mentioned: anthropology, archaeology, law, philosophy, political science, psychology, religion, sociology as well as content from the humanities.⁶

This KDE definition of social studies appears to be drawn from the National Council for the Social Studies’ definition, by the way.⁷ The National Council’s own listing of social studies disciplines also mentions integration from “Mathematics” and “Natural Science” in addition to all of those disciplines listed in Table 2. The key point here is that the social studies cover an amazing number of different disciplines.

Why are these national-organization-recognized and important, very basic social studies discipline areas being either ignored completely or at least degraded in importance in the Revised Standards? What was the basis for these decisions?

Table 2 Social Studies Strands Included and Omitted in the Revised Standards Based on Social Studies Topics Listed in the Kentucky Department of Education’s Web Site	
Disciplinary Strands Included	Disciplinary Strands not Included
Civics	Anthropology
Geography	Archaeology
Economics	Law
History	Philosophy
	Political Science
	Psychology
	Religion
	Sociology
	Humanities

History depersonalized

Jeff Shaara, an award-winning historical novelist, could easily point to one of the major problems in the Revised Standards. In the introduction to his novel, “A Blaze of Glory,” Shaara’s says:

If you have read any of my books, you know that these stories are driven not by events, but by characters. For me, the points of view of the characters in this story are more appealing than the blow-by-blow facts and figures that are the necessary products of history textbooks.⁸

As Shaara knows, information about the personalities involved with history enliven and flesh out the story best.

However, the Revised Standards are virtually devoid of mention of historical personalities. The only mentions I have found are cursory.

A listing in Grade 5 standard 5.H.CE.1 mentions George Washington, Thomas Jefferson and Sam Adams.

Another listing in Grade 4 standard 4.G.KGE.1 mentions Daniel Boone.

The first three individuals are named only as representative examples for many otherwise unnamed individuals involved with the American Revolution. Why, if Washington, Jefferson and Sam (but not John) Adams are listed, are many equally important figures from the American Revolution totally ignored?

Strangely, a motivational quote from Rosa Parks, the fifth historical personality named, is presented in introductory material on Page 10 of the Revised Standards. Parks, however, is nowhere actually listed in any specific standard for any grade. If, let alone when, Parks would be actually be covered is not specified.

Aside from those five individuals, a search in the PDF version of the Revised Standards for other extremely prominent individuals in American and world history shows all are ignored.

It's a glaring error to leave it to assumption whether or not Kentucky's children specifically learn about major historical personages such as Franklin Roosevelt, Harry Truman, Benjamin Franklin, Dr. Martin Luther King, Jr. and even Abraham Lincoln, arguably the commonwealth's most famous son. None are mentioned anywhere in these seriously deficient standards.

Also absent from the Revised Standards are all the key individuals who contributed greatly to the story of American exceptionalism and industrial development. Just a few names on the astonishing list of omitted personages include Thomas Edison, the Wright Brothers and George Washington Carver, a noted African-American who was born to slaves in 1864 and became a noted scientist and college educator.

Nothing in the Revised Standards insures Kentucky's students will learn about any of these individuals.

Such omissions certainly are NOT found in highly regarded state social studies standards such as those from Massachusetts.⁹ A very incomplete listing of key historical personages ignored by the Revised Kentucky Standards but found in Massachusetts' standards are listed below in Table 3.

Table 3 A Very Incomplete Listing of Key Historical Personalities Listed in Massachusetts' Social Studies Standards but Omitted from Kentucky's Revised Social Studies Standards		
Lord Baltimore	Roger Williams	William Penn
Benjamin Franklin	James Madison	King George III
John Winthrop	John Smith	John Dewey
Franklin D. Roosevelt	Theodore Roosevelt	President Eisenhower
Thomas Edison	The Wright Brothers	Abraham Lincoln
Dr. Martin Luther King, Jr.	Harriet Tubman	Alexander Hamilton
Alexander Graham Bell	Andrew Carnegie	Cornelius Vanderbilt
Note: Some of these also appear by name in the Indiana standards, as well.		

While Massachusetts' standards are not perfect by any stretch, they are far stronger than the Revised Standards. In fact, those Massachusetts standards were available and could have served as an excellent roadmap for a much better Kentucky product.

It certainly appears that the depersonalization of history in the Revised Kentucky Standards is intentional. Consider the material presented for Kentucky's Revised Standard for First Grade, 1.C.KGO.2 ***"Investigate how civic identity is shaped by symbolic figures, places and events."*** The Disciplinary Clarifications section of the Revised Standards on Page 43 reads:

"Civic identity can be shaped by diverse historical figures from the state, local communities, and unique places, which may include, but are not limited to, Churchill Downs, Mammoth Cave and the Appalachian Mountains, as well as events that have shaped civic identity in Kentucky like national conflicts."

How will local curriculum developers interpret this puzzling clarification that actually lists some specific places in Kentucky like Mammoth Cave and Churchill Downs yet fails to mention a single historical personage? How will test writers know what events to include among those that shaped civic identity in the Bluegrass State? In fact, since none are specifically listed, can any questions about events that shaped Kentucky's civic identity legally be included on the assessments?

This vague standard could result in over 700 vastly different answers – one for each elementary school in the state – about which, if any, historical figures and events each first-grade student in Kentucky will learn about. The standard is far too vague to establish anything approaching a common core of social studies knowledge.

It's also fair to question the age-appropriateness of this Grade 1 standard absent a whole lot of explanation that the Revised Standards simply fail to provide. Does this seem written in terms suitable to guide a first-grade discussion?

So, in general, the Revised Standards strongly lead Kentucky's social studies teachers to primarily focus on events but not on the people behind them. Mr. Shaara would be shocked.

Furthermore, without even a minimally acceptable listing of essential historical figures that all Kentucky students should know, the Revised Standards render it unlikely that students across Kentucky will gain any sort of common minimum core of such knowledge. In light of a recent report from the Woodrow Wilson Foundation¹⁰ that shows adult Kentuckians currently have the second-worst knowledge of US history of any state in the nation, this deficiency is particularly troubling.

The Revised Standards create another problem regarding included and omitted historical personalities. Because a few personages such as Washington and Adams are mentioned, there's an implication that the omitted persons are intentionally not included. As such, the language from SB-1, 2017 RS, which says things not in the approved standards cannot be tested, comes into play very strongly. Under these standards, could it actually be illegal for a Kentucky social studies assessment to ask a question about Abraham Lincoln? Do we want standards that create such uncertainties?

A lot more than historical figures gets ignored

Aside from a dearth of historical personages in the Revised Standards, drilling a bit deeper shows a lot of interesting Kentucky history is missing.

For example, nothing is said about Berea College, the first college in the US south to admit blacks and whites into integrated classrooms.¹¹

The Battle of Blue Licks, the last skirmish of the American Revolution and fought on Kentucky soil, is also unmentioned.

There's also significant omission of key terminology, which is particularly noticeable for geography. While a few mapping terms such as "Longitude" and "Latitude" appear, many additional terms of importance such as "Equator," "Greenwich (or Prime) Meridian," "Topographic Map," "Mercator Projection," "Volcano," "North Pole," "South Pole" and "Mount Everest" are absent from the entire Kindergarten to Grade 12 coverage.

Along these lines, the "Key Vocabulary" listings for each grade are ridiculously trivial and incomplete. The entire listing for Grade 3 includes just 17 items for the entire year. Furthermore, the Revised Standards say the actual curriculum "may" include these terms. So, the terms are not even considered mandatory knowledge. How will test creators interpret this? Should we even bother to include such lists if they are only going to be trivially inadequate?

Keep in mind, thanks to Senate Bill 1 from the 2017 Regular Session, it's reasonable for teachers and test writers to assume that omitted terminology is outside of the standards and therefore cannot be tested. That opens the door wide for questions about whether such important and basic material will actually be taught consistently across Kentucky.

Some omissions are truly puzzling. The "Pacific Ocean" is never mentioned but there are multiple references to the Indian Ocean Maritime System developed in ancient times. There are also mentions of the "Atlantic System" regarding trade in the Revised Standards, but the term "Atlantic Ocean" never appears. Terms like "Antarctic" and "Arctic" never appear, either. Will Kentucky's children ever learn these basic and key geography terms? How can you prove they will with these standards?

Will Kentucky's children ever learn our earth has a North and South Pole? If we can't test for those terms because they are not listed in the Revised Standards, how will we ever know?

By the way, deficiencies in the area of geography are particularly puzzling because Page 10 of the draft standards indicates the standards-creation team looked at the National Geographic Society's "Geography for Life: The National Geography Standards, Second Edition."¹² However, it seems like the National Geographic Society's guidance received rather cursory attention, at best. The fact that such detailed geographical standards information was available and apparently was largely ignored by creators of the Kentucky draft standards raises more disquieting questions about thoroughness and attention to detail.

It's also worth noting that despite the large number of strands covered by other, well-organized social studies programs, the length of the Revised Social Studies Standards is shorter (just 229 pages in total) compared to recently approved standards for Kentucky in the areas of reading and writing¹³ (458 pages)

and mathematics¹⁴ (258 pages). Neither of those more-focused academic areas have nearly as many disciplinary strands to cover.

For sure, massive omissions in the Revised Standards force far too many assumptions on those who must develop curriculum or assessments for social studies. The potential for chaos across Kentucky's classrooms is easy to see.

Age appropriateness?

One disturbing result from my very incomplete comparison effort to standards from Massachusetts and Indiana (see Tables 4 and 5 below) is that in too many cases – even when the Revised Kentucky Standards do call for material to be covered – it's first examined in considerably later grades than those specified in either Massachusetts' or Indiana's standards. Clearly, the Revised Standards would leave Kentucky students well behind their contemporaries in these other states.

There are other areas in the Revised Standards where consideration of the students' readiness seems doubtful. I already touched on one example where first-grade teachers are left to guess about what to include in ***"events that have shaped civic identity in Kentucky like national conflicts."***

Another example is found in the Disciplinary Clarifications for Kindergarten Standard K.G.HI.1. There the standards talk about ***"a rule posted on the wall which says to take turns when speaking."***

This is a standard for Kindergarteners. I suspect such young students are not ready to read rules posted on a wall.

In fact, anyone trying to get Kindergarteners to do this sort reading activity would probably be pushing sight word reading approaches that are highly inappropriate for beginning readers. A growing body of research papers including the National Reading Panel's report in 2000¹⁵ and more recent studies using functional MRI techniques¹⁶ indicates that students first need to learn phonics or they actually can wind up using the wrong side of their brain for reading activities. Could implementing this Disciplinary Clarification actually lead to inappropriate teaching?

Another major deficiency

Another major deficiency in the standards is that they don't provide any information about how success in mastering the standards will be measured. This omission will have adverse impacts on curriculum writers, teachers and especially test creators, where not only what to include, but how to grade it, are major concerns. Performance standards are needed, but the draft offers none.

The Revised Standards compare poorly against those from other states with highly regarded standards

To amplify the deficiencies in the Revised Standards, two tables below provide some comparisons to social studies standards from Massachusetts and Indiana, two states which received high marks for their

history coverage in reports from the Thomas B. Fordham Institute in Washington, DC in 2011¹⁷ and the Pioneer Institute in Massachusetts in 2017.¹⁸

The comparisons below in Table 4 reveal the Revised Standards are notably incomplete compared to what's outlined in Massachusetts' very highly regarded standards.

Note: Massachusetts titles its standards as a "framework," but the Massachusetts document is actually similar to the "standards" used in Kentucky because the Massachusetts document outlines what's fair game on that state's assessments.

Table 4 Comparison of Kentucky's Proposal¹⁹ to Massachusetts' (MA) 2003 Standards²⁰		
Ref. Number	Comments on Kentucky's Proposed Standard³	Comparison from Massachusetts⁴
1	The Civil War isn't mentioned until the 8 th grade.	MA starts Civil War in Grade 5 (Pg. 32)
2	No mention of the "Colonial Era" until the 8 th grade.	MA starts Colonial Period topic in Grade 5 (Pg. 27)
3	No mention of the term "Pilgrim." (Thanksgiving also not mentioned)	MA starts discussing Pilgrims in detail in Grade 3 (Pg. 20)

Table 4 Comparison of Kentucky's Proposal ¹⁹ to Massachusetts' (MA) 2003 Standards ²⁰		
Ref. Number	Comments on Kentucky's Proposed Standard ³	Comparison from Massachusetts ⁴
4	<p><u>Many</u> important personages are totally ignored. <u>NOT ONE</u> of the important individuals listed to the right, all of whom are explicitly mentioned by name in the MA standards, appears <u>ANYWHERE</u> in the proposed Kentucky Standards! <u>NOT ONE</u>!</p>	<p>In Grade 5, MA requires students to <i>"Identify some of the major leaders and groups responsible for the founding of the original colonies in North America."</i> Some specifically mentioned in the MA standards include: Lord Baltimore and Maryland, Roger Williams and Rhode Island, William Penn and Pennsylvania, John Winthrop in Massachusetts, John Smith in Virginia (Pg. 29)</p> <p>Also in Grade 5, MA, requires students to <i>"Describe the life and achievements of important leaders during the Revolution and the early years of the United States."</i> Some of these MA names who are missing in the Kentucky draft include: Benjamin Franklin, James Madison and King George III. (Pg. 31)</p> <p>Additionally, specifically mentioned in the MA standards:</p> <p>Franklin D. Roosevelt (Pg. 60), Theodore Roosevelt (Pg. 74), and President Eisenhower (Pg. 78), Martin Luther King, Jr. (Pg. 78)</p> <p>And, perhaps most intriguing of all for a school document, John Dewey (Pg. 74) is included in the MA standards but not in KY's!</p>
5	"American Revolution" not mentioned until 5 th grade.	MA introduces in Grade 3 (Pg. 20)
6	"Bill of Rights" not mentioned until Grade 5.	MA introduces Bill of Rights in Grade 3 (Pg. 21)
7	"Declaration of Independence" and "American Revolution" not specifically mentioned until Grade 5.	MA introduces the declaration and the American Revolution in Grade 3 (Pg. 21)

Table 4 Comparison of Kentucky's Proposal ¹⁹ to Massachusetts' (MA) 2003 Standards ²⁰		
Ref. Number	Comments on Kentucky's Proposed Standard ³	Comparison from Massachusetts ⁴
8	"Constitution" first mentioned in Grade 5. However, the term "Constitutional Monarchy" first appears in Grade 3. (Especially interesting is a federal law, discussed on Page 9 of the Revised Standards, that requires instruction on the Constitution on September 17 of each year. It looks like most elementary school students will start that date clueless about what the teachers are talking about because the Constitution won't be introduced to them until Grade 5.)	MA introduces the Constitution in Grade 3 (Pg. 21)
9	"New Deal" never mentioned	MA Covers in US History II (Pg. 72)
10	No specific wars except for the French and Indian War, the American Revolution and the Civil War are mentioned until high school (there's a vague reference to Protestant Vs. Catholic wars in Grade 7). The French and Indian War and the Revolution are covered in Grade 5 and the Civil War in Grade 8.	In sharp comparison, in MA many wars, some not even covered at any time in the proposed KY standards, are included in lower grades. Just a <u>very few</u> examples: <ul style="list-style-type: none"> • War of 1812 is covered in Grade 5 (Pg. 12) • Chinese Wars covered in Grade 4 (Pg. 23) • Pequot and King Philip's Wars in New England in Grade 5 (Pg. 29) • Israeli War of Independence in 1948 in Grade 6 (Pg. 36)

Table 4 Comparison of Kentucky's Proposal¹⁹ to Massachusetts' (MA) 2003 Standards²⁰		
Ref. Number	Comments on Kentucky's Proposed Standard³	Comparison from Massachusetts⁴
11	<p>Post-World War II conflicts are ignored. There's no mention of "Vietnam" or the "Vietnam War" or other related terms like "Southeast Asian Conflict" in Kentucky's draft. The "Korean War" is also never mentioned. The "Persian Gulf War" is similarly treated with absolute silence as are the countries of "Iraq" and "Afghanistan."</p> <p>This could prove particularly problematic because earlier wars such as World War II are mentioned. This implies that more recent conflicts like Vietnam are to be omitted. Again, if it isn't in the standards, it cannot be evaluated on assessments.</p> <p>(Note: Page 8 mentions that a KY statute requires students to learn about Veterans Day. How's this going to happen when none of the wars most living vets ever fought are covered before high school?)</p>	<p>MA covers the Vietnam War Memorial in a Grade 4 standard (Pg. 24) (Pg. 61) and other areas such as Vietnamese immigrant groups (Pg. 25) in a number of places. The Vietnam War is explicitly included with a lot of other detail about the Cold War Era in high school standards (Pg. 61)</p> <p>MA includes a massive amount of references to Korea and wars in that peninsula.</p> <p>MA covers the Persian Gulf War, too (Pg. 63).</p>
12	<p>"Religious Diversity" is not mentioned at all (but is in the current KY standards).</p>	<p>MA covers "Religious Diversity" as an optional topic in Grade 6 (Pg. 35)</p>

Table 4 Comparison of Kentucky's Proposal ¹⁹ to Massachusetts' (MA) 2003 Standards ²⁰		
Ref. Number	Comments on Kentucky's Proposed Standard ³	Comparison from Massachusetts ⁴
13	Discussion of map skills and terms is incomplete. For example, there's no mention of things like ensuring our kids know about the "North Pole" and "South Pole." Terms like "Greenwich Meridian," "Equator" and "Pole" never occur in the document. The only specific political capitals discussed are for the Byzantine Empire and the Aztec Empire. Neither Frankfort nor Washington D.C. are mentioned as capital cities. The Pacific Ocean is never mentioned.	<p>MA requires <u>1st graders</u> to:</p> <ul style="list-style-type: none"> • Define and locate the North and South Poles and the equator (Pg. 15) • Define and give examples of a continent, mountain, river, lake, and ocean (Pg. 15) <ul style="list-style-type: none"> • On a map of the United States, locate Washington, D.C. and identify it as the capital of the United States of America (Pg. 16) • Locate Boston and identify it as the capital of Massachusetts (Pg. 16) <p><u>And, this is just in the 1st Grade!</u></p> <p>MA requires this from 5th graders: Identify the location of the North and South Poles, the equator, the prime meridian, Northern, Southern, Eastern, and Western Hemispheres (Pg. 27)</p>
14	Calendars are never mentioned	<p>MA requires things like this for 2nd graders: "Use a calendar to identify days, weeks, months, years, and seasons." (Pg. 17) This is then expanded to introduce students to discuss historical periods in a more meaningful way.</p>
15	"South America" and "Antarctica" are not mentioned.	<p>MA introduces in Grade 2 and covers South America extensively later, as well. MA's Grade 2 students are expected to "...locate all of the continents: North America, South America, Europe, Asia, Africa, Australia, and Antarctica" (Pg. 18)</p>

Table 4 Comparison of Kentucky's Proposal ¹⁹ to Massachusetts' (MA) 2003 Standards ²⁰		
Ref. Number	Comments on Kentucky's Proposed Standard ³	Comparison from Massachusetts ⁴
16	There doesn't seem to be any discussion of how to become a naturalized citizen.	In MA they discuss <i>"different ways immigrants can become citizens of the United States"</i> in 4 th grade (Pg. 22)
17	There's no mention of the Mississippi or the Ohio rivers as a boundary for Kentucky. Obviously, there's a problem with Kentucky's kids not knowing about the "Kentucky Bend" or "Notch" that the river forms, as well. Folks in Fulton County might not like this very much)	MA 2 nd graders must identify the Mississippi River (Pg. 18) Other parts of the standards require students to be familiar with rivers in the Connecticut area (Pg. 20) Will the students in Massachusetts know more about Kentucky's western border than the Bluegrass State's own kids know?
18	The term "Middle East" only appears in conjunction with ancient time periods such as 1300 to 1500 (HS.WH.CH.1). No discussion of the Middle East in modern time is presented, indicating such is not required.	MA's standards mention Middle East or Middle Eastern 23 separate times and include extensive discussion of many issues.
19	Famous inventors like the Wright Brothers and Thomas Edison are never mentioned.	MA mentions both the Wrights and Thomas Edison in a Grade 1 standard (Pg. 16). Edison is mentioned again in a US History II standard (Pg. 73).
20	The terms "Atom" and "Atom Bomb" and "Atomic Energy" and "Energy" are all totally absent.	MA discusses the Atom Bomb and its implications in its World History Standard (Pg. 60) and its US History II Standards (Pg. 76). Energy in general is discussed in World History II (Pg. 57)
21	The term "Time Zone" never is mentioned. (KY has 2 of them, but our kids will get none of them!)	MA requires specific coverage about time zones in its Grade 6 standards (Pg. 34)
22	Introductory material points to statute that says: <i>"public middle and high school's curriculum shall include instruction on the Holocaust and other cases of genocide."</i> But, there's no further mention of this legal requirement in ANY standards area. In fact, the term "Holocaust" never appears in any grade-level standards. How and when is this supposed to be integrated into the instruction? When can it be tested?	MA covers the Holocaust in WHII.26 (Pg. 60) and WHII.39 (Pg. 62)
23	The "Manifest Destiny" is never covered.	MA covers Manifest Destiny in USI.26 (Page 68)

Table 4 Comparison of Kentucky's Proposal¹⁹ to Massachusetts' (MA) 2003 Standards²⁰		
Ref. Number	Comments on Kentucky's Proposed Standard³	Comparison from Massachusetts⁴
24	The "Monroe Doctrine" is never covered.	MA covers the Monroe Doctrine in two areas, USI.26 (Page 68) and USII.6 (Page 73)
25	The purchase of "Alaska," and the term "Alaska" itself never appear.	MA requires 4 th Graders to know the boundaries of Alaska Grade 4 Standard 4.9 (Page 24). MA covers "the purchase of Alaska from Russia" in USII.6 (Page 68)
26	The "Gadsden Purchase" is never mentioned.	MA covers the Gadsden Purchase in USI.26 (Page 68)
27	The "Louisiana Purchase" is never mentioned.	MA covers the Louisiana Purchase in Grade 5 standard 5.29 (Page 32) and in USI.22 (Page 68)
28	"Lewis and Clark" are never mentioned.	MA covers "the expedition of Lewis and Clark" in Grade 5 standard 5.30 (Page 32)
29	"Climate Maps" and "USDA Hardness Zones" are ignored.	MA covers "Climate Maps" in Grade 6 (Page 33)
30	The "Federalist Papers" are never mentioned.	MA Covers in multiple places including the introductory material (Pages 2 and 4) and high school standard USI.8 (Page 66) for just a few examples.

Likewise, a second comparison in Table 5 shows the Revised Standards don't measure up well against Indiana's current social studies standards, either.

Table 5 Abbreviated Comparison to Indiana's (IN) Standards²¹ Based on Findings in Table 4		
Reference Number from Table 4	Abbreviated Comments on Kentucky's Proposed Standard³ from Table 4	Comparison from Indiana⁵
1	The Civil War isn't mentioned until the 8 th grade.	Civil War coverage starts in Grade 4 (Grade 4 Standards, Pg. 5)
2	No mention of the "Colonial Era" until the 8 th grade.	IN starts <u>extensive</u> discussion of the colonial era in Grade 5 (Grade 5 Standards, PP. 3,4, 6-9, 12-15 + more)
3	No mention of the term "Pilgrim" or "Puritan."	IN standards also don't specifically mention "Pilgrim" but "Puritans" are discussed (IN Standard 5.1.5).

Table 5 Abbreviated Comparison to Indiana's (IN) Standards ²¹ Based on Findings in Table 4		
Reference Number from Table 4	Abbreviated Comments on Kentucky's Proposed Standard ³ from Table 4	Comparison from Indiana ⁵
4	<u>Many</u> important personages are totally ignored.	<p>A few people mentioned in the IN standards include George Washington, Chief Little Turtle, Abraham Lincoln, Harriet Tubman; and Martin Luther King, Jr. (beginning in Kindergarten Standards, Pg. 4)</p> <p>More are found later, including James Madison, George Mason and Alexander Hamilton (Grade 5 Standards, Pg. 5)</p> <p>Names continue to be added in the high school standards such as Theodore Roosevelt (High School US History Std. USH.3.3), Franklin D. Roosevelt (High School US History Std. USH.5.2),</p>
5	"American Revolution" not mentioned until the 5 th grade.	IN starts this in Grade 4 (Grade 4 Standards, Pg. 4)
6	"Bill of Rights" not mentioned until Grade 8.	IN starts Bill of Rights study in Grade 5 (Grade 5 Standards, Pg. 5)
7	"American Revolution" not specifically mentioned until Grade 5.	IN starts looking at American Revolution in Grade 4 (Grade 4 Standards, Pg. 4)
8	"Constitution" first mentioned in Grade 5.	IN starts extensive discussion first about the Indiana Constitution in Grade 4. (Grade 4 Standards, Pg. 7) and introduces the US Constitution in Grade 5 (Grade 5 Standards, Pg. 5)
9	"New Deal" never mentioned	IN covers in several high school areas, including Indiana Studies (IS.1.18) and US History (USH.4.8 and USH.4.9)

Table 5 Abbreviated Comparison to Indiana's (IN) Standards²¹ Based on Findings in Table 4		
Reference Number from Table 4	Abbreviated Comments on Kentucky's Proposed Standard³ from Table 4	Comparison from Indiana⁵
10	<p>No specific wars except for the French and Indian War, the American Revolution and the Civil War are mentioned until high school (there's a vague reference to Protestant Vs. Catholic wars in Grade 7). The French and Indian War and the Revolution are covered in Grade 5 and the Civil War in Grade 8.</p>	<p>IN mentions war vets as early as Grade 1 (Grade 1 Standard 1.1.4) and starts to deal with more rigorous discussion of Revolutionary War in Grade 3 (Grade 3 Standard 3.1.9). The Civil War gets extensive coverage in Grade 5 (Grade 4 Standards starting on Pg. 5). World War I & II and Korean War discussions start in Grade 4 (Grade 4 Standard 4.1.10 and 4.1.13)</p>
11	<p>Post-World War II conflicts are ignored. There's no mention of "Vietnam" or the "Vietnam War" or other related terms like "Southeast Asian Conflict" in Kentucky's draft. The "Korean War" is also never mentioned. The "Persian Gulf War" is similarly treated with absolute silence as are "Iraq" and "Afghanistan."</p> <p>This could prove particularly problematic because earlier wars such as World War II are mentioned. This implies that more recent conflicts like Vietnam are to be omitted. Again, if it isn't in the standards, it cannot be evaluated on assessments.</p> <p>(Note Page 8 mentions that KY statute requires students to learn about Veterans Day. How's this going to happen when none of the wars most living vets ever fought are covered before high school?)</p>	<p>IN Covers the Vietnam War in USH.7.9 for High School US History. The Korean War is specifically mentioned in Grade 4 Standard 4.1.13. IN does not mention the fairly recent Persian Gulf War.</p>

Table 5 Abbreviated Comparison to Indiana's (IN) Standards ²¹ Based on Findings in Table 4		
Reference Number from Table 4	Abbreviated Comments on Kentucky's Proposed Standard ³ from Table 4	Comparison from Indiana ⁵
13	Discussion of map skills and terms is incomplete. For example, there's no mention of things like ensuring our kids know about the North and South Poles. Terms like "Greenwich Meridian," "Equator" and "Pole" never occur in the document. The only political capital mentioned is for the Byzantine Empire. Neither Frankfort nor Washington DC are mentioned as capital cities. Neither the Atlantic nor Pacific oceans are ever mentioned.	Indiana's 2 nd Graders are expected to locate the equator and the poles (2 nd Grade Standard 2.3.2). Coverage of the hemispheres begins in Grade 3 (Grade 3 Standard 3.3.4)
14	Calendars never mentioned	Calendar discussion starts in Grade 2 in IN (Grade 2 Standard 2.1.6)
15	"South America" and "Antarctica" not mentioned.	South America is first discussed in Grade 6 (Grade 6 Standards, Pg. 3).
16	There's no discussion of how to become a naturalized citizen.	IN's USG.5.1 requires students to "identify the requirements for citizenship in the United States."
17	There's no mention of the Mississippi or Ohio rivers as a boundary for Kentucky. Obviously, there's a problem with Kentucky's kids not knowing about the "Kentucky Bend" or "Notch" that the river forms, as well. Folks in Fulton County might not like this very much.	In IN Standard 3.3.2 requires students to "Label a map of the Midwest, identifying states, major rivers, lakes and the Great Lakes."
18	The term "Middle East" only appears in conjunction with ancient time periods such as 1300 to 1500 (HS.WH.CH.1). No discussion of the Middle East in modern time is presented, indicating such isn't required.	IN mentions the term "Middle East" 6 times in just the K to Grade 8 standards and makes it clear that current issues in the region are to be discussed (Grade 7, Page 3)
19	Famous inventors like the Wright Brothers and Thomas Edison are never mentioned.	While IN doesn't mention these specific inventors, it does require discussion about the impact of inventors in Standard 8.4.4. and about inventions in numerous standards such as 5.4.4.
20	The terms "Atom" and "Atom Bomb" and "Atomic Energy" and "Energy" are all totally absent.	IN discusses Atomic Energy and other energy forms in Standards 6.1.17 and 6.4.6.

Table 5		
Abbreviated Comparison to Indiana's (IN) Standards²¹ Based on Findings in Table 4		
Reference Number from Table 4	Abbreviated Comments on Kentucky's Proposed Standard³ from Table 4	Comparison from Indiana⁵
22	Introductory material points to statute that says: <i>"public middle and high school's curriculum shall include instruction on the Holocaust and other cases of genocide."</i> But, there's no further mention of this legal requirement in ANY standards area. In fact, the term "Holocaust" never appears in any grade-level standards. How and when is this supposed to be integrated into the instruction?	IN covers this in Standard 6.1.20, a sixth grade standard.
23	The "Manifest Destiny" is never covered.	IN covers Manifest Destiny in Grade 8 standard 8.1.18
27	The "Louisiana Purchase" is never mentioned.	IN covers this in Grade 8 Standard 8.1.12
28	"Lewis and Clark" are never mentioned.	IN covers the Lewis and Clark expedition in Grade 8 standard 8.1.12
29	"Climate Maps" and "USDA Hardness Zone Maps" are ignored.	IN covers "USDA hardness zone maps" in Grade 4 standard 4.3.7.

It must be stressed that the listings in Table 4 and 5 are very incomplete. However, these tables provide good evidence that the Kentucky Revised Standards for Social Studies need more work. Just adding in the massive number of missing historic personalities and determining the grade sequencing when each will be covered is going to take a considerable amount of time.

In summation

Overall, there's simply no question that the draft Revised Standards for Social Studies need more work and are clearly deficient in their current form.

What's next?

The proper decision for the committee is to find 704 KAR 8:060 deficient and send the standards document back to the Kentucky Board of Education for more work.

It might be beneficial for the committee to suggest that the Kentucky Board of Education assemble a new set of individuals to review the standards and offer further improvements to them.

In closing, it's recognized that the development of solid education standards is extremely hard work. However, those standards become the cornerstone around which the entire remaining elements of our

education system are built, including both expensive state assessments and curriculum, which is time-consuming to create. Therefore, the state's social studies standards deserve as much time and attention as we can provide them. At present, the Revised Standards are too heavy on process and woefully deficient on content, and Kentucky's education leaders will do our students a great disservice to put this deficient draft into use without first providing it much more time and attention.

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(Final Edit: May 11, 2019)

Endnotes

- ¹ Senate Bill 1, 2017 Regular Legislative Session, Enrolled Version, Page 20. Online at: <http://www.lrc.ky.gov/recorddocuments/bill/17RS/SB1/bill.pdf>.
- ² Howe, Daniel Walker; Lewis, Anders and Donovan, Bill, "Laboratories of Democracy: How States Get Excellent K-12 U.S. History Standards, The Pioneer Institute, Boston, Massachusetts, Page 21. Online at: <http://pioneerinstitute.org/download/laboratories-democracy-states-get-excellent-k-12-u-s-history-standards/>.
- ³ "A Review of the Measurement Quality of the Kentucky Instructional Results Information System" is online at: <http://www.lrc.ky.gov/oea/reports/MEASUREMENT%20QUALITY%20FINAL%20REPORT%2091-94.pdf>.
- ⁴ Kentucky Department of Education, "2018 Kentucky School Laws Annotated," Complete to October, 2018, Page 872. Online at: <https://education.ky.gov/districts/legal/Documents/KY%20School%20Laws%202018%20Edition.pdf>.
- ⁵ Regarding the importance of factual knowledge for strong reading, see, for example, Pimentel, Susan, "Why Doesn't Every Teacher Know the Research on Reading Instruction?" Education Week, October 26, 2018. Online at: <https://www.edweek.org/ew/articles/2018/10/29/why-doesnt-every-teacher-know-the-research.html>, and Willingham, Daniel T., "How to Get Your Mind to Read," The New York Times, November 25, 2017. Online at: <https://www.nytimes.com/2017/11/25/opinion/sunday/how-to-get-your-mind-to-read.html>.
- ⁶ KDE's Social Studies web page is online at: <https://education.ky.gov/curriculum/conpro/socstud/Pages/default.aspx>.
- ⁷ See the National Council for the Social Studies definitions here: <https://www.socialstudies.org/standards/execsummary>.
- ⁸ Shaara, Jeff, "A Blaze of Glory," Ballantine Books, New York, New York, © 2012.
- ⁹ The Massachusetts History and Social Science Curriculum Framework, August 2003 is online at: <http://www.doe.mass.edu/frameworks/hss/final.pdf>.
- ¹⁰ The Woodrow Wilson Institute's news announcement about US History knowledge across the states is online here: <https://woodrow.org/wp-content/uploads/2019/02/WW-AHI-50-State-Release-02.14.19-fnl.pdf>.
- ¹¹ Berea College Quick Facts. Online at: <https://www.berea.edu/about/quick-facts/>.
- ¹² Downs, R. & Heffron, S. (Eds.). Geography for Life: The National Geography Standards, Second Edition. Online at: <https://www.nationalgeographic.org/standards/national-geography-standards/>.
- ¹³ Kentucky's newly adopted Kentucky Academic Standards - Reading and Writing for SY 19-20 are online here: https://education.ky.gov/curriculum/standards/kyacadstand/Documents/Kentucky_Academic_Standards_Reading_and_Writing.pdf.
- ¹⁴ Kentucky's newly adopted Kentucky Academic Standards - Mathematics for SY 19-20 are online here: https://education.ky.gov/curriculum/standards/kyacadstand/Documents/Kentucky_Academic_Standards_Mathematics.pdf.
- ¹⁵ "Report of the National Reading Panel: Teaching Children to read" is online here: <https://www.nichd.nih.gov/publications/pubs/nrp/smallbook>.
- ¹⁶ Wong, May, "Stanford study on brain waves shows how different teaching methods affect reading development," May 28, 2015. Online at: <https://news.stanford.edu/2015/05/28/reading-brain-phonics-052815/>.
- ¹⁷ Stern, Sheldon M. and Stern, Jeremy A., "State of State U.S History Standards 2011," Thomas Fordham Institute, February 2011, Page 2. Online at: http://edex.s3-us-west-2.amazonaws.com/publication/pdfs/SOSS_History_FINAL_7.pdf.
- ¹⁸ Howe, Daniel Walker; Lewis, Anders and Donovan, Bill, "Laboratories of Democracy: How States Get Excellent K-12 U.S. History Standards, The Pioneer Institute, Boston, Massachusetts. Online at: <http://pioneerinstitute.org/download/laboratories-democracy-states-get-excellent-k-12-u-s-history-standards/>.
- ¹⁹ The Kentucky Academic Standards for Social Studies revision dated April 2019 and presented to the Kentucky Board of Education on April 10, 2019 for its statement of consideration is online here: <https://portal.ksba.org/public/Meeting/Attachments/DisplayAttachment.aspx?AttachmentID=476202>.

²⁰ The Massachusetts History and Social Science Curriculum Framework, August 2003 is online at:
<http://www.doe.mass.edu/frameworks/hss/final.pdf>.

²¹ The Indiana standards are presented in separate documents by grade level (K to 8) or high school subject online here: <https://www.doe.in.gov/standards/social-studies>.