

NATIONAL
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Civics
Alliance

from NATIONAL ASSOCIATION of SCHOLARS

Robbie Fletcher, Commissioner
Kentucky Department of Education
300 Sower Blvd., 5th Floor
Frankfort, KY 40601

March 20, 2025

Dear Commissioner Fletcher,

The National Association of Scholars (NAS) and the Civics Alliance work to ensure that every state has academic standards that promote first-rate education and protect school children from political indoctrination. We promote reform of content standards in every state, along the lines modeled by the Civics Alliance's *American Birthright: The Civics Alliance's Model K-12 Social Studies Standards*,¹ and we have been asked by Kentucky citizens to comment on the Department of Education's current *Kentucky Academic Standards for Social Studies (2022)*, to help inform the Department as it begins the process of reviewing and revising these standards.² We conclude that the *Standards* require extensive overhaul—and that this improvement should be conducted by recruiting an independent commission to redraft new social studies standards.

The Existing *Standards*: Accomplishments

The *Kentucky Academic Standards for Social Studies* (hereafter *Standards*) have avoided some of the serious faults to be found in some other states' social studies standards. Those faults include unprofessional vocabulary and ideologically extreme content. Since 2020, such faults have degraded social studies standards in several states including Connecticut, Rhode Island, and Minnesota.³ By avoiding these faults, the Department has done Kentucky citizens a service.

¹ *American Birthright: The Civics Alliance's Model K-12 Social Studies Standards*, Civics Alliance, <https://civicsalliance.org/american-birthright/>.

² *Social Studies* (December 2022), Kentucky Academic Standards, Kentucky Department of Education, https://www.education.ky.gov/curriculum/standards/kyacadstand/Documents/Kentucky_Academic_Standards_for_Social_Studies.pdf.

³ David Randall, *Disowned Yankees: How Connecticut's Social Studies Standards Shortchange Students* (National Association of Scholars, 2024), <https://www.nas.org/reports/disowned-yankees>; David Randall, *Taken for a RIDE: How Rhode Island's Social Studies Standards Shortchange Students* (National Association of Scholars, 2023), <https://www.nas.org/reports/taken-for-a-ride>; Wilfred M. McClay, *National Expert: Minnesota's Academic Standards Among the Nation's Worst: Review of the 2021 Minnesota K-12 Academic Standards in Social Studies*,

But the *Standards*, unfortunately, present other significant problems. We list our general critiques below and accompany each critique with a recommendation for how to revise the *Standards*.

Format

The *Standards*' unnecessarily complicated format, which includes Standards, Concepts and Practices, Sample Evidence of Learning, and Disciplinary Clarifications, reduces comprehension by teachers, limits its effectiveness, and obstructs public understanding. This last failing is most serious, because it impedes democratic accountability. A signal of the unintelligibility of the *Standards* is the 11 pages of prefatory material. These pages purport to explain how to read the *Standards*, but properly drafted *Standards* should need no explanation at all.⁴ The basic structure of the *Standards* does not tell teachers, assessment designers, or citizens what should be taught or tested for—and Kentucky statute states that anything not in the state board approved standards cannot be tested.⁵ The *Standards* are too vague to say, and the “Disciplinary Clarifications” only provide out of context detail about some ways a Standard could be taught.⁶ The *Standards*' opaque format prevents them from providing real direction to any professional or public audience.

Recommendation: Kentucky's Education Department should redraft the *Standards* in a straightforward list format. The format should include just content-rich Standards, and remove Concepts and Practices, Sample Evidence of Learning, Disciplinary Clarifications, and all other complicating categories that are not written as standards and that impede comprehension of what the *Standards* actually mandate.

Language

The *Standards* unfortunately draw heavily from the National Council for the Social Studies' (NCSS) *College, Career, and Civic Life (C3) Framework for Social Studies State Standards*,⁷ which focuses upon “social studies skills,” leavened with extreme ideology, at the expense of real content.⁸ While it is understandable that the drafters of the *Standards* would look for guidance from a body called a “national council,” NCSS represents a perspective at odds with traditional views of social studies. The NCSS' *C3 Framework* is hostile to the concept of America as a nation founded on the principles of liberty and justice. The *Standards*, unfortunately, follow the *C3*

Draft Three (American Experiment, 2022), https://files.americanexperiment.org/wp-content/uploads/2022/10/Among-The-Nations-Worst.pdf?_gl=1*_hyy1ys*_ga*MjA3OTA5MTQ1Ny4xNzEyOTMzMTY5*_ga_03BRYTYNY0*MTcxMjkzMzE2OC4xLjEuMTcxMjkzMzE5MS4zNy4wLjA.

⁴ *Social Studies*, pp. 10-20.

⁵ “The statewide assessments shall not include any academic standards not approved by the board under subsection (2) of this section.” Kentucky Revised Statute (KRS) 158.6453(3)(c), <https://apps.legislature.ky.gov/law/statutes//statute.aspx?id=55562>.

⁶ E.g., “HS.WH.CE.4 Analyze causes and effects of political revolutions in multiple global regions from 1750-present.” *Social Studies*, p. 186. The Disciplinary Clarification provides several examples from 275 years of world history, but the standard remains too broad and vague.

⁷ *Social Studies*, p. 8; *College, Career, and Civic Life (C3) Framework for Social Studies State Standards*, National Council for the Social Studies, <https://www.socialstudies.org/standards/c3>.

⁸ 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/>.

Framework in these poor choices. Indeed, the *Standards* do not even meet the *C3 Framework*'s standards: the *C3 Framework* states that, "Content is critically important to the disciplines within social studies, and individual state leadership will be required to select appropriate and relevant content."⁹ The Department has not provided that content.

The *Standards*, for example, include items such as these:

Analyze how human settlement and movement impact diverse groups of people. [3.G.MM.1, p. 61]

This is so bland as to pass without notice, but it is in fact so vague as to be meaningless. "Human settlement and movement" entails all of humanity and plainly involves "diverse groups of people," but everything important about this bare fact comes from the specific places, the kinds of settlement, the reasons for movement, and which peoples. An educational standard cannot be an empty generality.

Analyze the causes and effects of the rise of River Valley Civilizations. [6.H.CE.1, p. 99]

This too is framed far too generally in geographical and chronological scope and is far too open-ended in the questions it asks of students. It also avoids focusing on the most important questions for social studies: what did the River Valley Civilizations of Mesopotamia and Egypt contribute to Israel and Greece, and thus to the foundation of Western civilization.

An example of a compelling question is "Can conflict truly be resolved?" (8.I.Q.1, p. 122)

This is not a compelling question because it cannot be answered concretely. A compelling series of questions for social studies might be, "How can conflict be resolved? When should one seek victory and when should one seek compromise to resolve conflicts? If conflict cannot be resolved, how can we manage it? What examples can we find in (Western) history to guide our behavior?"

Explain the role changing political, social and economic perspectives had on the lives of diverse groups of people in the Colonial Era. ... Diverse people led to diverse perspectives, which, in turn, often led to a variety of reform movements, new ideas and technologies. [8.H.CH.1, p. 135]

This standard, which leans heavily on the meaningless repetition of the word "diverse," also is too vague. The emphasis on "perspectives" avoids the possibility that some "perspectives" might be wrong, as well as the aspiration to know historical truth, which exists regardless of perspective. Nor do "diverse people" and "diverse perspectives" necessarily lead to reform movements, new ideas, or new technologies. For example: New England, not "diverse people" and "diverse perspectives," produced the cotton gin and the heartland of nineteenth-century American abolitionism. The standard's assertion is a slogan that does not describe or explain much of human history. It is not a historical truth that should be taught to Kentucky students.

Analyze how cultural and economic decisions influence the characteristics of various places. [HS.G.HI.2, p. 158]

This standard also is framed too vaguely to be useful for social studies instruction.

The *Standards* require Disciplinary Clarifications because the Standards frequently provide no help to a principal or teacher who wants to proceed beyond vague statements to detailed teaching

⁹ *C3 Framework*, p. 6

and study. The *Standards* should be written with enough detail, precision, and narrative coherence that Disciplinary Clarifications are not needed. The Disciplinary Clarifications, moreover, are not written in a Standard's directive format and are not sufficient to support assessment. They add nothing concrete because they are not actually standards.

Recommendation: Kentucky's Education Department should end its reliance upon the NCSS' *C3 Framework* and remove all concepts and languages from its *Draft Standards* that draw upon or parallel the concepts and language of the *C3 Framework*.

Recommendation: Kentucky's Education Department should redraft the *Draft Standards* to remove all vague language.

Factual Content

The Fordham Institute in *The State of State Standards for Civics and U.S. History in 2021* gave a C to both Kentucky's United States history and Civics content in its 2019 social studies standards,

Kentucky's civics standards are mediocre due to the scant attention given to the nuts and bolts of government, fundamental information about elections, and individual rights. The high school standards, in particular, are very short and broad. ...

Nominally, Kentucky offers two U.S. History sequences: one in fourth and fifth grades, the second in eighth grade and high school. Yet neither sequence is remotely comprehensive, and the first covers only the period between the start of European exploration and ratification of the Constitution. In general, the manner in which Kentucky divides content between strands and sub-strands is problematic, often obscuring chronological development and arbitrarily splitting related content. The level of detail provided by the standards is also inconsistent and, in some cases, inadequate—particularly at the high school level.¹⁰

This judgment generally holds for all material in the *Standards*. Vague Standards accompany Disciplinary Clarifications that generally consist of arbitrarily chosen examples, and which fail to provide the coherent, detailed facts and narrative the Standards cannot provide.

- Consider the Grade 2 Geography Standard, “Explain patterns of human settlement in North America” (2.G.MM.1, p. 54), for which the Disciplinary Clarification is: “For example, the Aztec empire built their capital city within a lake to provide defense and enhance transportation, and over 90 percent of the population of Canada live within 100 miles of the United States border because that is the location of most of their farmable land.” These two examples, separated by 500 years, and neither of them concerning the United States, are inappropriate for teaching second grade students the fundamentals of America's historical geography. Kentucky Geography instruction ought to begin with detailed instruction in the natural and historical geography of Kentucky and the United States.
- Consider the Grade 7 Evidence of Learning: “Students can compare the rights, roles and responsibilities of subjects living in empires between 600-1600, such as feudal France and Japan in Eurasia, Maya Civilization and the Aztec Empire of the Americas, trade-based

¹⁰ *The State of State Standards for Civics and U.S. History in 2021*, Fordham Institute, <https://fordhaminstitute.org/national/research/state-state-standards-civics-and-us-history-2021>, pp. 147, 149; and more largely, pp. 146-51.

empires of Ghana and Mali in West Africa and the highly centralized dynasties of China like the Tang and Song. Students may begin to understand that there are different sources of legitimacy in different places and that the roles of everyday people politically, socially and economically vary over time and place.” (7.C.RR.1, p. 108) This, a clarification of an even vaguer standard, tells teachers and seventh-grade students to look at empires worldwide in a 1,000 year period of history and come to an informative conclusion. This is vague and unhelpful. The *Standards* should focus upon the narrative of the development of conceptions of rights, roles and responsibilities of subjects and citizens in Western states, and the contribution of this developing conception to America’s ideals and institutions.

The *Standards* do now include more reference to the primary sources of American history because the Kentucky legislature required in Kentucky Revised Statute (KRS) 158.196 that the Department do so.¹¹ Yet as we have noted in a previous letter to the Department, the Department made minimal changes to the *Standards* to meet the legislative requirement.

The Department of Education may or may not have obeyed the letter of the legislative mandate. ... The Department’s revisions certainly have made the fewest possible changes to KAS-SS. KRS 158.196’s Section 3 directed the Department of Education to incorporate “fundamental American documents and speeches ... **including but not limited to** [our bold-face]” a list of 24 documents and speeches. The Department of Education has incorporated (with one important exception) only these 24 documents and speeches, and no others.¹²

The *Standards*, indeed, includes language that convey the impression that the Department accepted KRS 158.196’s requirements against its better judgment:

The sources listed in the standard are not a comprehensive list of documents needed to fully portray and understand American history, but they do provide insight into key actions, movements, and moments, in addition to establishing precedents and core principles.

In addition to these documents and speeches, multiple source types that capture diverse perspectives and voices may be included to fully contextualize American history. (8.H.CH.6, pp. 135-36)

The *Standards* by these sentences communicate to teachers the impression that the Department is more impressed by the shortcomings of these documents than by their value to a social studies education. The Department does not appear to be a full-hearted executor of Kentucky policymakers’ statutory requirements.

Certainly the changes the Department made to the *Standards* at the behest of the state legislature—inserting references to the named documents in the existing *Standards*, but making no structural changes—provide virtually no useful guidance to school districts, teachers, providers of professional development, textbook companies, or assessment companies.

¹¹ Kentucky Revised Statute (KRS) 158.196 [Instructional materials standards and concepts – Documents and speeches to be included.], https://apps.legislature.ky.gov/law/statutes/statute.aspx?id=53057&utm_medium=email&utm_source=govdelivery.

¹² Further Revisions to Kentucky’s Academic Standards for Social Studies, Civics Alliance, September 20, 2022, <https://civicsalliance.org/recommends-further-revisions-to-kentuckys-academic-standards-for-social-studies/>.

School districts and teachers should have substantial liberty to determine their own curricula. But state standards should help school districts and teachers by providing a content-rich outline of subjects to be covered. Kentucky’s Department of Education has not done so.

Recommendation: Kentucky’s Education Department should redraft the *Standards* to provide content-rich social studies standards, such as *American Birthright: The Civics Alliance’s Model K-12 Social Studies Standards* and the social studies standards of Louisiana, South Dakota, and Virginia.¹³

“Skills” and Inquiry-Based Pedagogy

The *Standards* lack factual content not least because they depend upon “Skills” instruction and “Inquiry-Based Pedagogy.”¹⁴ “Skills” focus and “Inquiry-Based Pedagogy” replace classroom focus on what to learn (content knowledge) with classroom focus on how to learn and what questions to ask. The advocates of “Skills” and “Inquiry-Based Pedagogy” claim that content, skills, and inquiries complement one another. Indeed they should, and in pedagogies such as Core Knowledge, which emphasizes acquiring substantive knowledge as a foundation for acquiring complementary skills, they do. Pedagogies that emphasize “skills” and “inquiry” in practice generally result in classrooms where students ask questions but never learn what the answers actually are. “Skills” and “Inquiry-Based Pedagogy” are at best unproductive and usually counterproductive.

The focus on “Skills” also profoundly distorts the rationale for social studies instruction, and therefore the way it is taught. In Grade 4, students examine “the reasons why and how people move from one place to another through their study of the migration and settlement of Colonial America.” (p. 70) Kentucky students should study the settlement of Colonial America because it is the story of the founding of their nation, not because it is an example of “the reasons why and how people move from one place to another.” The latter formulation detaches both teachers and students from the foundational commitment to know, with affection, that America is their country, and to teach and learn their country’s history.

Recommendation: The Department should remove all “inquiry” pedagogy from the *Standards*, and frame its standards instead as specific content to be taught and learned.

Recommendation: The Department should place any recommended pedagogies or skills in a separate *Curriculum Framework*, which should be made available for teachers, but not forced upon them by regulation or financial incentive.

Action Civics

Virtually every part of the *Standards* include “action civics,” also known as “protest civics.” Action civics repurposes civics instruction to ready students for public protest, emphasizes the defects of American society and the failures of American government, and diminishes attention to

¹³ *American Birthright*, p. 18; Louisiana Student Standards Social Studies, Louisiana Department of Education, https://www.louisianabelieves.com/docs/default-source/academic-standards/02-08-2022---draft-louisiana-social-studies-standards.pdf?sfvrsn=52de6518_14; South Dakota Social Studies Standards, South Dakota Department of Education, <https://doe.sd.gov/contentstandards/documents/SS-Standards-2023.pdf>; 2023 History and Social Science Standards of Learning, Virginia Department of Education, <https://www.doe.virginia.gov/teaching-learning-assessment/k-12-standards-instruction/history-and-social-science/standards-of-learning-1276>.

¹⁴ *Social Studies*, pp. 10-11.

the virtues of America’s Constitutional order. It particularly uses the pedagogy of “service-learning” to substitute vocational training in progressive activism for classroom civics education.¹⁵ The *Standards* indicate their commitment to ideologically extreme action civics by defining “engaged citizenship” to include “participatory citizenship (actively engaging in civic life through organizing groups, voicing opinions to public officials) or more justice-oriented citizenship (working to solve institutional problems and promote equitable social opportunities)”. (HS.C.RR.1, p. 244) The *Standards* license social studies teachers to replace classroom civics instruction that will inform students with the nature of their republic with uninformed activism, generally in service of progressive causes.

The *Standards* promote action civics above all by means of the category Communicating Conclusions, repeated in virtually every standard. Every single high school standard, for example, requires an “action plan”:

Engage in disciplinary thinking and apply appropriate evidence to propose a solution or design an action plan relevant to compelling and/or supporting questions in civics. (HS.C.I.CC.3, p. 142)

Engage in disciplinary thinking and apply appropriate evidence to propose a solution or design an action plan relevant to compelling and/or supporting questions in economics. (HS.E.I.CC.3, p. 150)

Engage in disciplinary thinking and apply appropriate evidence to propose a solution or design an action plan relevant to compelling and/or supporting questions in geography. (HS.G.I.CC.3, p. 159)

Engage in disciplinary thinking and apply appropriate evidence to propose a solution or design an action plan relevant to compelling and/or supporting questions in U.S. history. (HS.UH.I.CC.3, p. 166)

Engage in disciplinary thinking and apply appropriate evidence to propose a solution or design an action plan relevant to compelling/supporting questions in world history. (HS.WH.I.CC.3, p. 179)

The *Standards* distort all these classes toward progressive activism by requiring them to include “action plans”—which are tactical plans to organize students to mount a pressure campaign on policymakers to achieve a (progressive) political goal, with the corollary goal of psychologically conditioning students via ‘organization’ to become long-term (progressive) activists. They also distort Kentucky’s overall social studies instruction. It is telling that the *Standards* mention “action plans” more frequently than they mention liberty.

Recommendation: Kentucky’s Education Department should redraft the *Standards* to remove all action civics, including service-learning; above all by eliminating the Communicating Conclusions category from every course, but also by removing concepts such as “participatory citizenship” and “justice-oriented citizenship.”

¹⁵ 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>.

Vocabulary

Kentucky's *Standards* have not been politicized as badly as those in states such as Minnesota, Rhode Island, and Connecticut. Nevertheless, they contain too much ideologically extreme language, which distorts Kentucky's social studies instruction by word choice that embeds ideologically extreme arguments and suppresses pluralist debate.

- *Vocabulary*: The *Standards* rely extensively on progressive vocabulary popular in education schools, including *active citizens*, *acknowledging*, *civically engaged*, *community*, *culturally aware*, *decision-making skills*, *democracy* (substituted for *republic*), *democratic values/principles* (substituted for *American values/principles*), *diverse/diversity*, *engaged*, *enslaved*, *equity/equitable*, *evidence based*, *global*, *indigenous*, *inquiry practices*, *interact*, *justice-oriented citizenship*, *lens*, *multicultural*, *oppression*, *participatory citizenship*, *perspective(s)*, *public protests*, *socially responsible*.

Recommendation: The Department should remove progressive vocabulary, including references to concepts such as *diversity* and *equity* that now impose belief in discriminatory concepts by inculcation of ideologies known by names including Critical Race Theory; Diversity, Equity, and Inclusion; and so-called “anti-racism.”¹⁶ Above all it therefore should remove *diversity* from its list of basic goals for social studies instruction (p. 1) and replace it with *pluralism*.

Recommendation: The Department should replace “democratic” with “American” throughout, wherever *democratic* and *democracy* have been used as shorthand for the complex of American values which include liberty, law, justice, civic virtue, natural law, a republican form of government, and democracy.

Content

The *Standards* include a great many politicized distortions of social studies content itself—the heart of the *Standards*.

- The Grade 4 *Standards* minimize the democratic culture of Colonial America by articulating the grievances of modern identity politics: “In Colonial America, not all voices were heard, for example, women, enslaved people and those who did not own property were excluded.” (4.C.CP.2, p. 76) The *Standards* register similar identity-politics minimization of the West and America's extraordinary history of liberty and republican self-government in areas including 5.H.CH.1, p. 91; 6.C.RR.1, p. 100; 7.C.RR.1, p. 113; and 8.C.CV.1, p. 130.
- The Grade 5 *Standards* require “Describe the traditions diverse cultural groups brought with them when they moved to and within the United States.” (5.G.HI.1, p. 85) They do not require instruction in America's common traditions—what traditions united Americans, and what traditions have been the basis for Americans' collective love of liberty.
- The Grade 5 *Standards* discuss economic freedom awkwardly: “As Kentucky grew from part of the Virginia Colony to a state, Kentuckians discovered new incentives

¹⁶ The department should remove identity-politics language such as *diversity*, *equity*, and *multicultural* from items including Geography (p. 4); SS.2.3 (p. 8); SS.3.1 (p. 11); SS.3.3 (p. 11); SS.4.1 (p. 13); SS.4.12 (p. 14); SS.8.22 (p. 28); SS.8.23 (p. 28); SS.E.31 (p. 52); SS.S.9 (p. 55); and SS.P.19 (p. 59).

to make money and new opportunities to increase their wealth. In spite of these opportunities, some Kentuckians made the choice to not take advantage of incentives offered.” (5.E.KE.1, p. 89) This sounds as if the *Standards* are trying to say *many Kentuckians chose to be poor*—but the *Standards’* convoluted language is unclear. The *Standards* do not appear to know how to convey the action of economic freedom in history.

- The Grade 5 *Standards* repeat a central distortion of *The 1619 Project*: “The slave trade ... created, through force, the capital through which the later industrial economy was created.” (5.H.CE.3, p. 92) Reputable historians have repeatedly disproved this claim, which attempts to discredit America’s system of economic freedom by falsely claiming that it is rooted in slavery.¹⁷ This is not merely politicized distortion of emphasis, but significant historical inaccuracy.
- The Grade 7 *Standards* refer to the Republic of Venice as “a more democratic form of government.” (7.C.CV.1, p. 114) The Venetian Republic was famous as an exemplar of *aristocratic* government—including among writers such as Montesquieu, whose *Spirit of the Laws* was enormously influential on America’s Founding Fathers as they crafted our Constitution to include elements of monarchical, aristocratic, and democratic government. The *Standards’* extensive misuse—and overuse—of “democratic” here leads them to a misstatement that will severely distort teachers’ and students’ understanding of America’s Constitution and its intellectual background.
- The Grade 8 *Standards* refer to the Constitution as a “living document.” (8.C.PR.2, p. 131) The phrase “living document” is a keyword of progressive jurisprudence, and is vigorously opposed by Originalists and other intellectual opponents of progressive jurisprudence. The *Standards* should use depoliticized language to prompt study of constitutional history, not language that assumes the arguments of a progressive school of interpretation.
- The Grade 8 *Standards* do not mention the argument that the Constitution was an anti-slavery document, a position held by historical figures such as Frederick Douglass and modern scholars such as Sean Wilentz.¹⁸ The *Standards’* neglect of this argument improperly lends authority to the argument that the Constitution was a pro-slavery document—an argument that also is used in modern polemics to delegitimize America’s Constitution and Republic.
- The High School World History *Standards* do not mention African participation in the trans-Atlantic slave trade, led by kingdoms such as Oyo, Dahomey, and Asante. (HS.WH.CE.3, p. 185) The *Standards’* neglect of this fact gives an untrue impression that the trans-Atlantic slave trade was only conducted by Europeans,

¹⁷ Phillip Magness, “How the 1619 Project Rehabilitates the ‘King Cotton’ Thesis,” *National Review*, August 26, 2019, <https://www.nationalreview.com/2019/08/1619-project-new-york-times-king-cotton-thesis/>.

¹⁸ Frederick Douglass, *The Constitution of the United States: Is it Pro-Slavery or Anti-Slavery?* (1860), <https://www.blackpast.org/global-african-history/1860-frederick-douglass-constitution-united-states-it-pro-slavery-or-anti-slavery/>; Sean Wilentz, *No Property in Man: Slavery and Antislavery at the Nation’s Founding* (Cambridge: Harvard University Press, 2018).

rather than as a partnership between Africans and Europeans. This untrue impression is at the heart of the discriminatory concepts used to inculcate ideologies know by names including Critical Race Theory; Diversity, Equity, and Inclusion; and so-called “anti-racism.

- The High School World History *Standards* use uncritically favorable language to describe progressive nongovernmental organizations: “Among non-state actors are groups seeking greater social justice, who often use peaceful methods like boycotts, protests and social media awareness to promote their causes” (HS.WH.CO.6, p. 192) The *Standards* should mention that every sort of pressure group uses these methods, that the characterization of them as “peaceful” assumes a point at issue, and that many or most Americans regard “social justice” organizations as tools which ideologically extreme elites too frequently have used to erode liberty and circumvent republican self-government. The *Standards*’ uncritically favorable language used to describe progressive nongovernmental organizations therefore will be taken by many Kentuckians as partisan support of these organizations’ damaging goals.

Such language extensively distorts and politicizes the *Standards*.

Recommendation: The Department should remove from the *Standards* all politicized distortions to social studies content.

Liberty

The *Standards* reduce mentions of *liberty* and *freedom*; and substitute phrases such as *democratic principles* for *American principles*, which would encompass liberty, law, justice, civic virtue, natural law, a republican form of government, and democracy. The *Standards* minimization of classroom instruction in liberty does grave harm to America’s foundational commitment to the ideal of liberty.

A Grade 2 Disciplinary Clarification states that “Effective government is one which creates order, establishes justice and meets the needs of its citizens.” (2.C.CP.2, p. 51) The absence of *liberty* from this definition is symptomatic of the *Standards*’ more general minimization of liberty. Consider likewise: “There are basic rights afforded to citizens in North America today which are similar to those of early North American societies.” (2.C.RR.2, p. 51) This formulation likewise avoids mentioning *natural rights*, or *inborn liberty*. The Disciplinary Clarification on “democratic principles” states that it includes “inalienable rights” (2.C.CV.2, p. 52)—but this, aside from the distorting labeling as a “democratic principle,” still avoids mentioning *natural rights* or *liberty*.

The Grade 5 *Standards* state that “The slave trade caused the loss of personal liberty and degradation of inherent human dignity to enslaved persons.” (5.H.CE.3, p. 92) The *Standards* nowhere define what precisely *is* personal liberty or human dignity, explore how they informed the lives, cultures, and ideals of free Americans, provide the history of these ideals in Western Civilization, or explain how these ideals came to inspire the historically unique Western, Christian crusade for abolition.

The Department should mention liberty in all these individual standards, and reframe the *Standards* as a whole to make Liberty a central organizing concept.

Recommendation: The Department should add to the four Discipline Strands of social studies (Civics, Economics, Geography, and History; pp. 11-12) a Discipline Strand on *Liberty*, defined as:

The slow development and application of the ideals and institutions of liberty, particularly those embodied in constitutional self-government. Students generally should be able to identify the ideals, institutions, and individual examples of human liberty, individualism, religious freedom, and republican self-government; assess the extent to which civilizations have fulfilled these ideals; and describe how the evolution of these ideals at different times and in different places has contributed to the formation of modern American ideals.¹⁹

Recommendation: The Department should add to the four Discipline Strands of social studies a Discipline Strand on *Documents of Liberty*. The most effective instruction in Liberty will be by teaching students the primary sources that illustrate the steadily increasing Western and American commitment to the ideals and institutions of liberty. The Department should incorporate a series of named documents into the *Standards* and integrate coverage of them throughout the *Standards*. The series should include at least the 24 documents specified by Kentucky in KRS 158.196. Ideally the series also should include a broader selection of documents, keyed to the history of the intellectual background of the Founding Documents and the history of the United States. (See **Appendix 1: Recommended Historical Documents**.) The Department should then publish a *Documents of Liberty Reader*, and provide lesson plans and professional development, to facilitate teachers' ability to provide instruction in the Documents of Liberty.

Recommendation: The Department should consider integrating a larger number of primary sources into their *Standards*, such as are provided by *American Birthright*.

Geography

Geography should focus on teaching students factual knowledge of the geography of Kentucky, the United States, and the world. The *Standards'* Geography definition, however, prompts teachers to replace factual content with "skills," and provides prompts to ideologically extreme activism: "Students gain geographical perspectives of the world by studying the earth and the interactions of people with places where they live, work and play. Knowledge of geography helps students to address the various cultural, economic, social and civic implications of life in Earth's many environments." (p. 12). The *Standards'* Geography definition replaces actual Geography instruction with ideologically extreme activism tied to a miscellany of current events.

Recommendation: The *Standards* should replace the Geography Disciplinary Strand definition with this language: "Geographers and students of geography learn how to make and understand maps, inform themselves of the natural and political contours of the world, and use this knowledge to illuminate their understanding of economics and history." The *Standards* should be revised throughout to reinforce coverage of factual knowledge of the geography of Kentucky, the United States, and the world, and to remove all material that prompts ideologically extreme activism.

¹⁹ *American Birthright*, pp. 22-23.

World History

The *Standards* provide in Grade 6, Grade 7, and High School World History a too-brief survey of the history of Western Civilization and very abbreviated treatment of World History outside of Europe. Students need to learn the detailed narrative of Western Civilization, to provide coherent instruction in the development of the ideals and institutions of liberty that formed America. They also need dedicated instruction in World History, which teaches students about the particular nature of different civilizations instead of a superficial and homogenizing “global” history.

Recommendation: The *Standards* should replace the current World History sequence with a required Western Civilization sequence, consisting of spiraled instruction in Grades 3-5, Grades 6-8, and high school, which provides the coherent narrative of the ideals and institutions of liberty that formed America. This Western Civilization sequence should extract the *Standards*’ existing materials on the history of Western Civilization from the current World History instruction, and expand upon them to provide greater detail, especially of the histories of liberty, faith, science, and technology. The *Standards* would especially benefit from extended historical coverage of two historical sequences now almost entirely absent:

- i. the Renaissance rediscovery and elaboration of the concepts of liberty, individualism, republicanism, and tolerance;²⁰ and
- ii. England’s history of liberty from Magna Carta to Henry VIII to John Wilkes, including common law, the growth of parliamentary power, the English Civil War, the Glorious Revolution, legal freedoms such as *habeas corpus*, and the expansion in England of a culture and society animated by the ideals of freedom.

Recommendation: The *Standards* should create a distinct World History sequence, which provides fuller coverage of Asian, African, and Latin American history.

American and Kentuckian Cultural History

The *Standards* provides too little material on America’s and Kentucky’s common culture. The history of common culture is the history of what unites Americans and Kentuckians, rather than what divides them. It also is the history of people enjoying themselves—their stories and their music—and students need to learn that history is more than a dour series of political and social problems and crises. *The Standards* generally contain only vague prompts to study cultural history. Kentucky students should learn far more American cultural history, from Edgar Allan Poe to Tin Pan Alley to Georgia O’Keeffe.²¹ Kentucky students also should learn more about Kentucky’s common culture, including bluegrass music, authors such as Alice Hegan Rice and Wendell Berry, equestrian sports, and religious faith.

Recommendation: The *Standards* should integrate coverage of the history of America’s common culture throughout its coverage of United States history.

²⁰ *American Birthright*, p. 28.

²¹ Cf. the extended coverage of American cultural history in *American Birthright: Grade 11, United States History*, Item 15 (pp. 124-25), Item 38 (p. 130), Item 48 (p. 132), Item 62J (p. 136), Item 63 (p. 136), Item 77 (p. 140).

Recommendation: The *Standards* should integrate coverage of the history of Kentucky’s common culture throughout its coverage of Kentucky history.

Reading and Writing Expectations

Kentucky’s *Standards* contain no concrete reading or writing expectations. The *Standards* convey the impression that it is acceptable for Kentucky students to graduate high school without having read a book of history or written a history paper. Kentucky’s *Standards* should have firm and clear expectations for reading and writing, which parents may use to hold their schools and their teachers accountable.

Recommendation: The *Standards* should integrate concrete reading expectations, which build toward students capable by graduation from high school of reading an intellectually and stylistically sophisticated 200-page history book, to demonstrate that they are prepared for an undergraduate history course.

Recommendation: The *Standards* should integrate concrete writing expectations, which build toward students capable by graduation from high school of writing an intellectually and stylistically sophisticated 5-page history paper, to demonstrate that they are prepared for an undergraduate history course.

Military, Religious, and Economic History

The *Standards* compress, although they do not delete, military, religious, and economic history. Above all they compress the narratives and the importance of Western, American, and Kentuckian valor, faith, and prosperity. Kentucky students cannot understand the true history of the West, America, or Kentucky if they do not learn full accounts of our wars, faiths, and free markets. The *Standards* should revise their content throughout to make central these fundamental themes of history.

Dependence on the C3 Framework and the American Institutes for Research (AIR)

Many flaws in the Kentucky’s *Standards* proceed from one general cause: the *Standards* unfortunately derive too much of their structure and content from the National Council for the Social Studies’ (NCSS) *College, Career, and Civic Life (C3) Framework for Social Studies State Standards*.²² The *C3 Framework* 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 activism pedagogies such as Action Civics.²³ The *Standards*, as a result of their dependence on the *C3 Framework*:

- extensively have adopted “skills” instruction and “inquiry-based pedagogy”;
- have incorporated action civics throughout the document; and
- to a limited extent have allowed identity-politics ideology to influence content.

A major part of the *Standards*’ dependence on the *C3 Framework* probably derived from the Department’s decision to hire American Institutes for Research (AIR) to take part in Kentucky’s

²² *Social Studies*, p. 8.

²³ 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/>.

social studies standards revision process.²⁴ States that hire AIR to take part in their social studies standards revision process standardly produce social studies standards that recapitulate the flaws of the NCSS' *C3 Framework*: insufficient content knowledge, extensive use of "inquiry" pedagogy, heavy use of "skills" instruction; action civics; and at least some identity-politics ideology influence on content.²⁵ All these consequences are the predictable results of hiring AIR. The Department's decision to hire AIR was tantamount to a decision to adopt the ideologically extreme structure of the NCSS' *C3 Framework*.

Furthermore, journalists recently have published evidence that AIR has overcharged the federal government for its work as a contractor.²⁶ Prudence suggests that the Department and state policymakers both should investigate whether AIR has overcharged the Department for its work.

Recommendation: The Department should detach the *Standards* from such ideologically extreme structures as the NCSS' *C3 Framework*. It also should detach the *Standards* from the NCSS's ideologically extreme definition of social studies.²⁷

Recommendation: The Department should not hire AIR, or in any way involve AIR, in any part of the creation or revision of its *Standards*.

Strategic Recommendations

We have provided the above recommendations for revision to the Department of Education, but we do not believe that social studies standards revision can or should be undertaken entirely by the Department. We make three strategic recommendations to the Department and to Kentucky policymakers.

- **Independent Commission.** The *Standards* require fundamental change rather than limited revision. We therefore recommend that the Department ask Kentucky's legislature enact a law to appoint an independent commission, not staffed by Department personnel, to redraft Kentucky's social studies standards, along the lines we have suggested.
- **Licensure Requirements and Professional Development:** The Department also should update its licensure requirements and professional development to ensure that its teachers are equipped to teach curriculum that aligns with our suggested emphases, including Liberty, Documents of Liberty, and American Common Culture.

²⁴ Standards and Assessments in Social Studies, American Institutes of Research, <https://www.air.org/resource/spotlight/standards-and-assessments-social-studies>.

²⁵ 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.

²⁶ Alex Gutentag and Michael Shellenberger, "US Education Department Contractor Overcharged Taxpayers While Spending Millions On Executive Salaries," *Public*, March 17, 2025, <https://www.public.news/p/us-education-department-contractor>.

²⁷ Comment on the NCSS's New "Social Studies" Definition, Civics Alliance, <https://civicsalliance.org/comment-on-the-ncsss-new-social-studies-definition/>.

- **Statutory Reform:** The Department should ask state policymakers to enact laws that ensure proper social studies instruction in all Kentucky public K-12 schools.²⁸

Conclusion

The Kentucky Department of Education’s proposed *Standards* possess significant virtues, but they also require extensive overhaul. The Department should revise the proposed *Standards* in detail as we have recommended in this public comment. We suggest that the Department examine our model *American Birthright* social studies standards to help inform its revision of Kentucky’s social studies standards, but we also suggest that the Department examine the fine alternate models of Louisiana, South Dakota, and Virginia to help inform its revision.²⁹ The Department also should request Kentucky policymakers to appoint an independent commission to redraft new social studies standards.

Respectfully yours,



Peter Wood
President, National Association of Scholars



David Randall
Executive Director, Civics Alliance

²⁸ Civics Alliance: Social Studies Curriculum Act, <https://civicsalliance.org/model-palm-card/social-studies-curriculum-act/>; Civics Course Act, <https://civicsalliance.org/model-k-12-civics-code/civics-course-act/>; United States History Act, <https://civicsalliance.org/model-k-12-civics-code/united-states-history-act/>; Western Civilization Act, <https://civicsalliance.org/model-k-12-civics-code/western-civilization-act/>; Historical Documents Act, <https://civicsalliance.org/model-k-12-civics-code/historical-documents-act/>; and more broadly, the Model K-12 Civics Code, <https://civicsalliance.org/model-k-12-civics-code/>.

²⁹ 2022 K-12 Louisiana Student Standards for Social Studies, Louisiana Department of Education, https://www.louisianabelieves.com/docs/default-source/academic-curriculum/k-12-louisiana-student-standards-for-social-studies.pdf?sfvrsn=df396518_38; South Dakota Social Studies Standards (2023), South Dakota Department of Education, <https://doe.sd.gov/contentstandards/documents/SS-Standards-2023.pdf>; 2023 History and Social Science Standards of Learning, Virginia Department of Education, <https://www.doe.virginia.gov/teaching-learning-assessment/k-12-standards-instruction/history-and-social-science/standards-of-learning-1276>.

Appendix 1: Recommended Historical Documents

<p><i>Founding Documents, Intellectual Background</i></p> <p>Magna Carta (1215)</p> <p>Petition of Right (1628)</p> <p>English Bill of Rights (1689)</p> <p>Toleration Act (1689)</p> <p>John Locke, <i>Second Treatise of Civil Government</i> (1690)</p> <p>Montesquieu, <i>The Spirit of Laws</i> (1748)</p>	<p>Abraham Lincoln, “House Divided” speech (1858)</p> <p>Abraham Lincoln, Second Inaugural Address (1865)</p> <p>Niagara Movement Declaration of Principles (1905)</p> <p>Theodore Roosevelt, “The Man with the Muck-rake,” speech (1906)</p> <p>Woodrow Wilson, “Peace Without Victory,” speech (1917)</p>
<p><i>United States Documents</i></p>	
<p>Articles, Laws, and Orders of Virginia (1610)</p> <p>Fundamental Orders of Connecticut (1639)</p> <p>Massachusetts Body of Liberties (1641)</p> <p>Pennsylvania Charter of Privileges (1701),</p> <p>John Woolman, <i>Some Considerations on the Keeping of Negroes</i> (1754)</p> <p>John Adams, <i>Braintree Resolves</i> (1765)</p> <p><i>Common Sense</i> (1776)</p> <p>Virginia Declaration of Rights (1776)</p> <p>Massachusetts Constitution and Declaration of Rights (1780)</p> <p>Virginia Statute for Religious Freedom (1786)</p> <p>Northwest Ordinance (1787)</p> <p>Anti-Federalist Papers: Brutus No. 1 (1787)</p> <p>The Federal Farmer, <i>Letter III</i> (1787)</p> <p>The Federalist Nos. 9 (Alexander Hamilton), 39 (James Madison), and 78 (Alexander Hamilton) (1787-88)</p> <p>Benjamin Franklin, <i>The Autobiography of Benjamin Franklin</i> (1791)</p> <p>Thomas Jefferson, First Inaugural Address (1801)</p> <p>Alexis de Tocqueville, <i>Democracy in America, Volume I</i> (1835) and <i>Volume II</i> (1839)</p> <p>Abraham Lincoln, “Speech on the Dred Scott Decision” (1857)</p>	<p><i>Schenck v. United States</i> (1919)</p> <p>Justice Oliver Wendell Holmes’ dissenting opinion in the case of <i>Abrams v. United States</i> (1919)</p> <p>Herbert Hoover, <i>Rugged Individualism</i> (1928)</p> <p>Franklin Delano Roosevelt, First Inaugural Address (1933)</p> <p>Franklin Delano Roosevelt, “Four Freedoms” speech (1941)</p> <p>Justice Robert M. Jackson’s opinion for the Supreme Court in <i>West Virginia State Board of Education v. Barnette</i> (1943)</p> <p>Learned Hand, <i>The Spirit of Liberty</i> (1944)</p> <p>The Truman Doctrine (1947)</p> <p>George Kennan, “The Sources of Soviet Conduct” (1947)</p> <p>John F. Kennedy, Inaugural Address (1961)</p> <p>Ronald Reagan, Berlin Wall Speech (1987)</p> <p>Ronald Reagan, Speech at Moscow State University (1988)</p> <p>George W. Bush, Second Inaugural Address (2005)</p> <p><i>District of Columbia v. Heller</i> (2008)</p> <p><i>Dobbs v. Jackson Women's Health Organization</i> (2022)</p>