

January 9, 2013

In the Matter of Proposed Amendments To Minnesota Rules Chapter 3501.1300-3501.1345. Minnesota K-12 Academic Standards in Social Studies Agency Post-Hearing Response to Public Comments

I. Introduction

The Minnesota Department of Education (the department) noticed its intent to hold a hearing regarding proposed amendments to Minnesota Rules Chapter 3501.1300-3501.1345 in a Dual Notice of Hearing published in the State Register on Monday, October 29, 2012, State Register Volume 37, Number 18. The Notice provided for the submission of comments from October 29, 2012, through November 30, 2012 and also provided for a public hearing that was held on December 20, 2012. The comment period was extended by order of the Administrative Law Judge presiding at the hearing until 4:30 p.m. on January 9, 2013.

This rulemaking is limited in scope to the amendments proposed in that Notice under the authority of Minnesota Statutes section 120B.02.

The department has presented information to demonstrate that the proposed amendments are needed and reasonable, mainly in the Statement of Need and Reasonableness (SONAR) and the supporting exhibits to the SONAR, and in this document, hereinafter called the Response. The SONAR document provides more in-depth information and about many of the topics discussed in this Response. The department's response to concerns about the proposed 2011 social studies standards that were discussed in depth in the SONAR will be briefly addressed in this Response. Where a more in-depth discussion of a topic is available in the SONAR, this Response will indicate so and provide a page number in the SONAR where the detailed discussion can be found.

This Response includes the department's preliminary response to comments regarding the proposed Social Studies Standards revision that were received during the public comment period, October 30 through November 30, 2012, and to the oral and written statements made at the public hearing on December 20, 2012 and comments received during the post-hearing comment period prior to January 9, 2012. The department may consequently submit a follow-up to this Response during the rebuttal period between January 10 and January 16, 2013.

The department's Response contains: a) a restatement of the general statements that the department made on the record in the hearing regarding certain issues that have been

identified; and b) responses to specific comments, either on broad issues or concerns, or in response to specific comments and concerns identifying particular elements of the proposed rule language. Due to time limitations, some comments that identified very minor issues may not be specifically addressed in this Response, although the department did carefully review and consider all comments received. Additionally, a number of comments received were considered by the department to be beyond the scope of this rulemaking process, and are only briefly addressed in the Response, by indicating that the comment was out of the scope of the present rulemaking proceeding. An example of comments that were out of the scope of this rulemaking proceeding are those comments specifically related to supporting benchmarks. Although the benchmarks are not part of this rulemaking proceeding this Response will address benchmarks where necessary and appropriate to respond to comments.

We thank all individuals who participated in the rulemaking process by providing input and testifying at the hearing, and providing written comments during the public comment period.

II. General Comments on the Proposed Social Studies Standards

The department conducted a comprehensive review process to elicit public feedback on the proposed standards as they were being developed. Feedback from the public, including over 1100 public comments, was carefully considered by the standards review committee (the Committee) throughout the review process, and the draft standards were modified accordingly. It is important to note that many of the issues voiced at the hearing were not raised to a substantive degree during either of the two public comment periods or at any other time during the official review process. The SONAR and standards revision, therefore focuses on the issues that were raised on a large scale during the official review process.

A. Statutory Authority

1. Some commenters stated that the revision of the 2004 standards went beyond the “revision and alignment” of the standards intended by Minnesota Statutes section 120B.023.

Response: The department has general rulemaking authority under Minnesota Statutes section 120B.02 to conduct rulemaking about the social studies academic standards. The current social studies standards were written in 2004. In 2006 legislation was passed that required the department to “revise and align” the social studies academic standards in the 2010-2011 school year and to subsequently review the standards in the 2019-2020 school year.¹ The standards committee was also tasked with complying with several new legislative mandates created after the development of the 2004 standards, such as embedding “technology and information literacy” into the standards and “aligning the standards and related benchmarks with the knowledge students need for college readiness and advanced work in the particular subject area.” The department disagrees with concerns expressed that the department’s revision of the 2004 standards is a much greater revision than what was anticipated by the “revise and align” language set out in state statute, or that the proposed changes go beyond what would be

¹ Minn. Stat. § 120B.023 (2006).

considered a reasonable and necessary revision and alignment of the standards. Significant changes were needed to the 2004 standards as a result of new legislative mandates and to respond to extensive feedback provided by the education community (over 1000 comments) about the 2004 standards and early drafts of the proposed 2011 standards. The department believes that the proposed 2011 standards effectively revise and align the 2004 social studies standards in compliance with state statutes, new state mandates, and response to feedback provided by the Minnesota education community.

2. Some commenters stated that the department did not have legislative authority to revise the benchmarks that support the 2011 proposed social studies academic standards.

Response: The benchmarks are not part of this rulemaking proceeding, thus comments addressing concerns about language in specific benchmarks are outside the scope of this agency Response and will not be addressed. However, due to the close relationship of the academic standards and the supporting benchmarks the department will briefly address the issue raised that the department does not have authority to revise existing benchmarks.

As stated in the SONAR, the standards are “broad statements of the knowledge and skills that students need to master in order to be considered proficient in a content area.” The SONAR also states that “each standard is supported by one or more benchmarks that specify the knowledge and skills that students must complete by the end of a grade level (grades K-8) or grade band (grades 9-12) to satisfactorily complete a standard.” Due to the close relationship between standards and benchmarks the two must be reviewed and revised simultaneously. For every rulemaking proceeding relating to academic standards in Minnesota since 2007, including Math, Arts, Science, and English Language Arts, the respective revision committees carefully reviewed and revised the supporting benchmarks along with the academic standards for each subject area.

The statutory changes and feedback from the education community discussed briefly above and extensively in the SONAR, require that both the standards and benchmarks be revised simultaneously in order to ensure that the standards and benchmarks “fit” together in a cohesive manner. Revision of the standards without the benchmarks would render the benchmarks useless for the education community because the benchmarks would not be aligned with the standards that they are intended to support. The benchmarks supplement the standards and inform and guide educators as they craft curriculum to meet the standards. Simply put, the department would do Minnesota’s education community a great disservice if it revised the social studies standards without simultaneously revising the supporting benchmarks that specify the “knowledge and skills that schools must offer and students must achieve to satisfactorily complete the state standards.”² Furthermore, Minnesota Statutes section 120B.023, Subd. 2(a) requires that “during each review cycle, the commissioner also must examine the alignment of each required academic standard and related benchmarks with the

² Minn. Stat. § 120B.023, Subd.1(a).

knowledge and skills students need for college readiness and advanced work in the particular subject area.” Thus, Minnesota statutes require the department to revise the benchmarks during the standards review process to ensure there is alignment between the proposed standards and the supporting benchmarks, particularly with regard to new statutory mandates.

The department has general rulemaking authority to promulgate academic standards under Minnesota Statutes section 120B.02. In addition, because the revision and alignment of the supporting benchmarks along with the academic standards is necessary and reasonable to ensure workability, the department does not need to seek out specific legislative authority for developing supporting benchmarks for the proposed 2011 social studies standards.

3. Some commenters expressed disagreement that federal requirements, including the No Child Left Behind Act (NCLB)(and the funding attached to it) require the state to adopt social studies standards. In addition, some commenters stated that NCLB does not mention social studies.

As stated in the SONAR, on pp. 15-16, NCLB requires that each state adopt “challenging academic content standards...that will be used by the State.”³ NCLB further requires that states must have academic standards for all public elementary and high school students “in subjects determined by the State, but including at least mathematics, reading or language arts...and science.”⁴ Although it is true that NCLB does not specifically mention social studies, NCLB specifically requires states to have standards in subjects that are determined by the state. Minnesota Statutes section 120B.021, Subd. 1(4), requires state academic standards in social studies. Thus, in order to comply with federal law, Minnesota must have academic standards in social studies.

4. Some commenters argued that the proposed standards do not comply with Minnesota Statutes section 120B.021, Subd, 2(b) which requires academic standards to be “(1) be clear, concise, objective, measureable, and grade-level appropriate; (2) not require a specific teaching methodology or curriculum; and (3) be consistent with the Constitutions of the United States and the State of Minnesota.”

The department respectfully disagrees with the comments stating that the proposed standards do not comply with Minnesota Statutes section 120B.021, Subd. 2(b). Several of the comments related to this topic voice concerns about specific benchmarks, which are not part of this rulemaking proceeding. The proposed standards and supporting benchmarks are drafted in clear, concise language, and reflect understandings and skills that are well accepted within the social studies academic community. As required by state law, the proposed standards are supported by grade-level benchmarks (K-8), that specify the knowledge and skills that students must achieve to satisfactorily complete a

³ No Child Left Behind Act, Section 1111(b)(1), Pub. L. 107-110 (2002).

⁴ *Id.*

standard. The proposed standards are measureable because the benchmarks guide teachers in developing tests and other kinds of assessments to measure student achievement of standards. The standards are grade-level appropriate because they are supported by grade-specific benchmarks. The proposed standards are measureable because teachers use the supporting benchmarks and local curriculum to gauge student learning in each of the disciplines. The proposed standards do not require a specific teaching methodology or curriculum. Curriculum decisions are left up to local districts to determine the approach that best meets the needs of their schools and students. (Please see p. 5-6 of this Response for further discussion on this topic). Lastly, the proposed standards are consistent with the Constitutions of the United States and the State of Minnesota, having been reviewed by scholars and other experts who are familiar with these documents.

B. Grade-Specific Standards

1. Commenters expressed concern that grade-specific standards will result in lesser quality social studies instruction. They prefer to have grade-banded standards.

Response: The standards are not grade-specific. The benchmarks which support the standards in grades K-8 are grade-specific. According to state law, “the commissioner must supplement required state academic standards with grade-level benchmarks.” Benchmarks are the specific “academic knowledge and skills that schools must offer and that students must achieve to satisfactorily complete a state standard.”⁵ Benchmarks are not the topic of this rulemaking process, however as stated earlier in this Response they may be addressed if necessary and appropriate to respond to a comment..

C. Extent of Revisions to Standards and Vetting Process

1. Commenters expressed concern that the proposed social studies standards represent a major revision to, rather than a minor update of, the 2004 standards, and that the standards were not properly vetted.

Response: The department is required to review and revise academic standards according to requirements set forth in state statute, and these requirements impact the scope of revisions to current standards. The proposed social studies standards must satisfy numerous mandates as listed below:

- Revised standards must address technology and information literacy skills⁶;
- Revised standards must reflect college and work readiness skills and knowledge⁷;
- Revised standards must include the contributions of American Indian tribes and communities;⁸ and

⁵ Minn. Stat. § 120B.023, Subd. 1 (2006).

⁶ *Id.*

⁷ *Id.*

⁸ Minn. Stat. § 120B.023, Subd. 1 (2006).

- Revised standards must include grade-specific benchmarks, rather than grade-band benchmarks as found in the 2004 standards⁹;
- Revised standards need to complement, but not duplicate, the 2010 Minnesota Academic Standards in English Language Arts which include literacy standards for history/social studies; and
- Many different groups, including K-12 teachers and instructors at post-secondary institutions must be consulted for their advice in developing the standards.¹⁰

The law does not require the department to limit the scope of changes to a specified amount; rather, the law requires the department to review and revise the standards according to the aforementioned requirements.

Input provided by teachers and others, as well as the previously mentioned requirements, determined the scope of the revisions. The proposed standards are the result of an intensive yearlong review and revision process that was continually informed by input provided by teachers, college instructors, parents, business representatives, community members and national experts in each content area. The vetting process included two formal public review and comment periods, stakeholder group feedback meetings with the commissioner, focus groups and online surveys, consultations with postsecondary faculty in Minnesota, and feedback provided by an unprecedented number of national content experts. As a result, most school districts report that their teachers approve the proposed standards and are working diligently to align local curriculum and instruction to new standards.

Finally, as stated previously in this Response many of the issues voiced at the hearing were not raised to a substantive degree during either of the two public comment periods held during the standards development or at any other time during the official review process, thus the standards committee's work focused on comments received during the standards development phase.

D. Inclusion of Topics in Standards Versus Curriculum

1. Commenters expressed concern that unless a topic is explicitly mentioned in the standards or benchmarks, it will not be taught.

Response: It is helpful to understand the relationship between standards, benchmarks and curriculum. Each social studies discipline in the proposed standards has 10 to 23 standards. A *standard* is a broad statement of skill and understanding that students must learn in order to be prepared for postsecondary education and advanced work. The standards represent the “big picture;” that is, the major concepts and skills that students return to again and again throughout their K-12 education. With the exception of history, each standard describes an important disciplinary concept. In history, the standards

⁹ *Id.*

¹⁰ Minn. Stat. § 120B.021, Subd. 2.

characterize an era in either U.S. or world history. (The SONAR¹¹ provides further explanation about why history is structured this way.) Each standard is supported by one or more benchmarks. A *benchmark* is a specific statement of knowledge and skills that students must achieve by the end of the grade level (grades K-8) or grade band (grades nine through twelve) to satisfactorily complete a standard. Benchmarks are unique to each grade level. Benchmarks are not the topic of this formal rulemaking process.

Many topics that are not explicitly mentioned in the standards may be addressed in the supporting benchmarks. If topics are not addressed in the supporting benchmarks, they may be taught nonetheless through local *curriculum*. While hundreds of topics may be included in the curriculum, it is neither realistic or desirable to identify large numbers of specific topics in the standards and supporting benchmarks. The standards and supporting benchmarks identify the important goals or outcomes of student learning. School districts help students achieve these outcomes through curriculum that is aligned to the standards and benchmarks. If the standards and supporting benchmarks are too specific in content coverage, they will necessarily be too numerous, as well. Standards and benchmarks that are too specific and/or too numerous have the effect of narrowing local control of curriculum.

The Council of Chief State School Officers (CCSSO) notes the danger of confusing the types of topics that should be addressed in curriculum with the goals or outcomes of standards and benchmarks. “This confusion,” asserts CCSSO, “may result in standards too numerous to measure and insufficient curriculum definition to guide instructional activities.”¹² In Minnesota, school districts determine the specific content, instructional strategies, and classroom assessments they will use so that all students satisfactorily complete all social studies standards. Schools may teach more, but not less, than is in the standards. As required by state law, the department must develop standards that do not require a specific teaching methodology or curriculum.¹³

It is misleading to suggest that unless a topic is explicitly stated in the standards or benchmarks, it will not be taught. Any topic that is addressed by the state standards and benchmarks must be taught. Some topics may not be explicitly mentioned in the standards because they are addressed by a larger concept or understanding, or historical time period. For example, specific names of civil rights leaders are not mentioned in the history standards, because this level of detail would not fit with the general nature of the standards and the supporting benchmarks. History Standard 22 and a supporting seventh grade benchmark illustrate this point:

History Standard 22: The student will understand that post-World War II United States was shaped by an economic boom, Cold War military engagements,

¹¹ Minnesota Department of Education, *Statement of Need and Reasonableness: Proposed Rules Governing Social Studies Academic Standards; Minnesota Rules, Chapter 3501.1300*, p. 59-60 (September 21, 2012).

¹² Rabinowitz, Stanley, Ph.D., et. al, *Creating Aligned Standards and Assessment Systems*, Council of Chief State School Officers, p. 6. (2006).

¹³ Minn. Stat. § 120B.021, subd.2(b)(2)

politics and protests, and rights movements to improve the status of racial minorities, women and America's indigenous peoples between 1945 and 1989.

Grade 7 History Benchmark 7.4.4.22.6: Compare and contrast the goals and tactics of the Civil Rights Movement, the American Indian Movement, and the Women's Rights Movement; explain the advantages and disadvantages of non-violent resistance. (Post-World War II United States: 1945-1989)

This standard requires students to learn about "rights movements to improve the status of racial minorities..." and the supporting benchmark requires them to learn about "the Civil Rights Movement." It is highly unlikely that students would be able to complete this standard and seventh grade benchmark without learning about the leaders of these movements, such as Dr. Martin Luther King Jr.

History Standard 22 is also supported by the following high school benchmark:

High School History Civics Benchmark 9.4.4.22.6: Identify obstacles to the success of the various civil rights movements; explain tactics used to overcome the obstacles and the role of key leaders and groups. (Post-World War II United States: 1945-1989)

This high school benchmark explicitly requires students to explain the role of "key leaders and groups." Again, although the leaders and groups are not mentioned by name, it is highly unlikely that students would be able to complete this high school benchmark without learning about the leaders of these movements, such as Martin Luther King Jr. School districts will decide which leaders will be covered under these benchmarks according to local curriculum preferences and the needs of their students.

E. Lack of Specificity in the Standards and Omission of Key People, Places, and Events.

1. Commenters expressed concern that the revised standards lack specificity and omit content on key topics, people, places and events.

Response: Feedback collected by the department prior to and during the standards revision process indicated that an important, if not the most important, concern with the 2004 standards was the *overly-specific* nature of the standards. A closely related concern was the *large number* of standards. Educators reported again and again that the specificity and sheer quantity of standards was unreasonable in at least two ways. First, the 2004 standards require too many topics to be covered in the amount of time typically allotted for social studies instruction. Second, the specificity of the content in the 2004 standards severely limits local curriculum options. This condition is in violation of state laws related to standards and local autonomy. One statute states that academic standards "must not require a specific teaching methodology or curriculum."¹⁴ Another statute declares that the commissioner "shall not prescribe in rule or otherwise the delivery system, classroom assessments, or form of instruction that school sites must

¹⁴ Minn. Stat. § 120B.021, Subd.2(b)(2).

use.”¹⁵ A third statute states that “any state action regarding the [standards] rule must evidence consideration of school district autonomy.”

Research published by the CCSSO warns of the consequences of too many standards:

“The consequences of having too many standards...are disjointed instruction, attempts to cover the content too rapidly (and thus leaving little time to answer student questions, much less develop students who are thoughtful in their understanding and use of the course content), and students who may have factual knowledge but who are unable to use or apply what they have learned. Sets of standards that contain large numbers of standards will encourage superficial learning, not the deep understanding of the content area many educators believe is most important.”¹⁶

According to the CCSSO, states can avoid creating standards that are too numerous and specific by focusing on the key concepts and ideas for the content area. These so-called “big ideas’...can guide instruction that is deep and meaningful, helping students to understand the concepts, not just memorize facts (which may be quickly forgotten).”¹⁷ Research on college readiness affirms the focus on “big ideas,” the essential knowledge of each discipline that prepares students for advanced study.¹⁸

The proposed standards address concerns about the quantity and specificity of standards by focusing on the most important principles, concepts and skills of the four social studies disciplines. By enlarging the so-called “grain size” of the standards, and the benchmarks which support them, the department was able to reduce the overall number of standards and benchmarks to a teachable number of concepts and skills while preserving the option for schools to choose curriculum that they feel best delivers the standards and meets the needs of their students.

As discussed in Section D (above), names of individuals, places and events may not be explicitly mentioned in the standards because they are addressed by a larger concept or understanding or historical time period. In the vast majority of cases, however, these specific topics will be addressed by local curriculum aligned to the proposed standards.

F. Emphasis on Skills Over Content

1. Commenters voiced concern that the proposed standards lack content and that the proposed standards emphasize skills at the expense of factual and/or content knowledge.

¹⁵ Minn. Stat. § 120B.02(a).

¹⁶ Rabinowitz, Stanley, Ph.D., et. al., *Creating Aligned Standards and Assessment Systems*. Issue Paper 3 of 3, Council of Chief State School Officers, p.10 (2006), available at

http://www.ccsso.org/Documents/2006/Creating_Aligned_Standards_2006.pdf (last visited January 9, 2012).

¹⁷ *Id.*

¹⁸ Alliance for Excellent Education, *High School Teaching for the Twenty-First Century: Preparing Students for College*. Issue Brief, Washington DC (September 2007), available at: <http://www.all4ed.org/files/HSTeach21st.pdf> (last visited January 9, 2012).

Response: The proposed standards require students to master a wide range of content *and* skills. The first part of this response speaks to general concerns about content knowledge, and the second part addresses general concerns about skills.

Content knowledge: Content knowledge has not been de-emphasized in the proposed standards. There are 57 standards in the proposed 2011 social studies standards. 11 of the 12 civics standards are focused more on content knowledge than skills. 10 of the 12 economics standards and 8 of the 10 geography standards are focused more on content knowledge than skills. In History, 18 of the 23 standards are focused more on content knowledge than skills.

Some commenters stated that because particular topics (e.g., War of Texas Independence, World War I, America's early leaders) are not mentioned in the standards, these things will not be taught. The department disagrees with this assertion, as explained below.

The proposed standards are written at a broader level of generalization (i.e., a larger "grain size") than the 2004 standards which were more numerous in quantity and more specific in detail. It is incorrect to assume that because particular people, places and events are not specifically mentioned in the standards, students will not be taught these things. In most if not all cases, these topics will be included in the curriculum that local school districts use to deliver the standards, For example, one commenter said that "pilgrims" are not mentioned in the standards. However, this idea is covered by History Standard 16, excerpted here:

History Standard 16: The student will understand that rivalries among European nations and their search for new opportunities fueled expanding global trade networks and, in North America, colonization and settlement and the exploitation of indigenous peoples and lands; colonial development evoked varied responses by indigenous nations, and produced regional societies and economies that included imported slave labor and distinct forms of local government between 1585 and 1763.

The department believes it would be difficult, if not impossible, to teach "colonization and settlement" during the time period covered by this standard without discussing the "pilgrims."

Other commenters claimed that students would be asked to apply "analysis without actual factual knowledge." The implication is that because the standards lack reference to factual knowledge, students will not learn these things. On the contrary, students will not be able to master such a standard unless their analysis is rooted in content knowledge, and schools will consider this as they align their curriculum to the standards. As an example, examine high school U.S. history benchmark 9.4.4.17.2:

High School U.S. History Benchmark 9.4.4.17.2: Analyze the American revolutionaries' justifications, principles and ideals as expressed in the Declaration of Independence; identify the sources of these principles and ideals

and their impact on subsequent revolutions in Europe, the Caribbean, and Latin America. (1754-1800)

In order to teach students how to “analyze the American revolutionaries’ justifications, principles and ideals,” students will need to understand a body of knowledge related to concepts such as liberty and self-government. Schools will design instruction to help students master the facts and concepts related to the revolutionaries’ justifications, principles and ideals, and this instruction will build the foundation for the higher level skills and enduring understandings addressed by this benchmark. The delineation of the content knowledge that supports this benchmark is most appropriately placed at the local level rather than the level of the state standard or benchmark.

Skills: One commenter stated that “students deserve strong content as opposed to skills,” a belief that is unsupported by research that describes the kinds of education that prepare students for college, careers, citizenship and life in an increasingly globalized world. This belief sets up a false dichotomy as both content knowledge *and* skills are essential and intertwined in the delivery of social studies instruction.

As stated in the SONAR¹⁹, many of the jobs that our students will hold in the future do not even exist yet. The most important and transferable part of students’ education is the critical thinking and problem solving skills that will enable them to adapt to the changing job market of the future. Thus, the department decided that it was important for students to develop essential skills in each of the social studies disciplines in every grade, K-8, along with content knowledge. There are standards related to civic skills, economic skills, geospatial skills, and historical thinking skills or perspectives at every grade level. This ensures that students will not go more than a year without practicing key skills in each discipline, such as chronological thinking, map-making, reasoned decision-making, or public policy issue analysis. Skills are also included at the high school level, but there is a higher emphasis on content as more mature students are better able to understand complex information and context, and develop a sense of the world that they will enter as adults.

One commenter stated that “tools of analysis are missing, such as compare and contrast.” However, the proposed standards are supported by benchmarks at each grade level that require students to apply analytic skills such as “compare and contrast.”

(See Part H-College and Career Readiness of this Response, for additional rationale for skills in the proposed standards.)

G. Focus on “Social Studies” Instead of Discipline-Specific Study

1. Commenters expressed concern that history, civics and geography would be put into “one combined class called ‘social studies.’” They said that teacher education programs contribute to teachers’ lack of content knowledge because

¹⁹ Minnesota Department of Education, *Statement of Need and Reasonableness: Proposed Rules Governing Social Studies Academic Standards; Minnesota Rules, Chapter 3501.1300*, p. 33 (September 21, 2012).

they encourage “aspiring teachers to seek certification in social studies rather than history.”

Response: The proposed standards are discipline-specific. Best practice research, as discussed in the SONAR,²⁰ indicates that an integrated social studies approach is preferable to teaching the content in disciplinary “silos,” especially in the early grades. It is also important to teach for interdisciplinary connections to science, mathematics and language arts content. The course offerings through which the proposed social studies will be delivered is the decision of local school districts. It is up to local school districts to determine whether the standards will be delivered through an integrated social studies course or a discipline-specific course such as “U.S. History” or “Geography.”

Teacher preparation requirements are not the subject of these proposed rules.

H. Chronological Development Across All Disciplines

1. One commenter objected to “the lack of chronological development across all disciplines.”

Response: The department is unsure as to what this comment means. Chronology is important in history and the proposed history standards are organized chronologically by era. Chronology is not relevant to the organization of the other social studies disciplines.

The comment may have been a reference to the developmental progression of knowledge and skills from one grade level to the next. If so, expert reviewers of the standards have commented that the proposed standards lay out a smooth progression of K-12 learning. For example, Alfred Andrea, president of the World History Association, commented that:

“...Before setting down any specific points, I feel compelled to state, even more explicitly than in the previous paragraph, that overall this is a superior K-12 social studies curriculum, and its excellence is due to a number of factors, not least of which are its coherence and its carefully laid-out process of graduated learning. The architects of these standards deserve high praise for their work.”²¹

I. College and Career-Readiness

1. Commenters indicated that the standards will not adequately prepare students for college and citizenship.

Response: As explained extensively in the SONAR, the standards committee studied numerous reports of national significance and analyzed suggestions provided by scholars in postsecondary education and the workplace. Based on their analysis, the standards committee determined that college and career readiness consists not only of the social studies knowledge and skills needed for further education and careers, but

²⁰ Minnesota Department of Education, *Statement of Need and Reasonableness: Proposed Rules Governing Social Studies Academic Standards; Minnesota Rules, Chapter 3501.1300*, p. 34 (September 21, 2012).

²¹ Alfred Andrea, *Expert Review of the Draft Minnesota Social Studies Standards* (2012).

also the knowledge, skills and dispositions that prepare students for productive citizenship. Therefore, the social studies standards committee identified and organized the essential skills and knowledge necessary for citizenship and college and career readiness, and worked to make these a primary focus of learning at every grade level in K-12.

To accomplish this task, committee members addressed three questions: 1) What does “College and Career Readiness” look like in Social Studies? 2) How do we know when a student is college and career ready?, and 3) What should students know and be able to do? Hundreds of responses to these questions were compiled into a master list, and sorted into categories. Ultimately, the Committee agreed upon four major categories of skills in social studies that prepare students for college, careers and citizenship. They are: Inquiry, Analysis, Problem Solving and Communication. These categories, represented in Figure 1, are the foundational skills that will be practiced and developed by students in each social studies discipline at every single grade level from kindergarten through high school across Minnesota.



Figure 1: Citizenship, college and career readiness in the proposed social studies standards

Another way that the Committee ensured that the proposed social studies standards provide college and career readiness, was to align the social studies standards with the *2010 Minnesota Academic Standards in English Language Arts*. The language arts standards contain content related to literacy in history and social studies. They include all of the Common Core language arts standards—rigorous standards that have been widely documented as aligned with college and career-readiness expectations.

Many years ago, employers and college instructors shared little agreement on how students needed to be prepared for success in college or the workplace. This has now changed. “In the last decade, research conducted by Achieve as well as others shows a convergence in the expectations of employers and colleges in terms of the knowledge and skills high school graduates need to be successful after high school.”²² Below are some of the key studies and organizations that influenced the standards committee’s

²² *Achieve and the American Diploma Project Network*, available at: <http://www.achieve.org/files/Aboutpercent20AchieveADPApr2012.pdf> (last visited January 9, 2012).

work on the proposed standards (please see the SONAR's bibliography for complete citations for these sources):

- The Association for Career and Technical Education;
- "What Works Requires of Schools: A SCANS Report for America 2000;
- "Critical Skills Needs and Resources for the Changing Workforce";
- "Are They Really Ready for Work";
- *College Knowledge*, by researcher David Conley²³;
- The National Council for the Social Studies²⁴; and
- The Partnership for 21st Century Skills (P21 Partnership)

The P 21 Partnership, as discussed in depth in the SONAR released *The 21st Century Skills Map* was released in 2008.²⁵ This map, or framework, acknowledges that mastery of core subjects is crucial, but in order for students to be ready to achieve and thrive in the sophisticated world of the 21st century, "schools must move beyond a focus on basic competency in core subjects to promoting understanding of academic content at much higher levels. P21, in collaboration with the National Council for the Social Studies, cites essential social studies skills for students in the 21st century as referenced in the SONAR.²⁶

Professional organizations in each of the social studies disciplines also agree on the need to provide increased emphasis on skills so that students are ready for college and careers. The American Historical Association (AHA), for example, cites the need for standards to emphasize a number of analytical skills, and chronology and periodization. In addition, history standards should delineate "a balance among various major facets of the human experience in the past." The AHA notes that adequate standards may vary greatly in how they indicate appropriate factual coverage, and in what they detail. They should nevertheless indicate the importance of dealing with social (such as race, class and gender), cultural, economic, technological and political components and with their mutual relationships.²⁷

The Minnesota Transfer Curriculum, a collaborative effort by all two- and four-year public colleges and universities in the state, provides information about the knowledge and skills that students are expected to achieve when they transfer their work in lower-division general education. In history and the social and behavioral sciences, students are expected to increase their knowledge of how historians and social and behavioral scientists discover, describe, and explain the behaviors and interactions among individuals, groups, institutions, events, and ideas. They are expected to employ the methods and data that historians and social and behavioral scientists use to investigate the human condition, examine social institutions and processes across a range of historical periods and cultures, use and critique alternative explanatory systems or

²³ Conley, David, *College Knowledge: What it Really Takes to for Students to Succeed and What We Can Do to Get Them Ready*, Jossey-Bass, San Francisco, California (2005).

²⁴ National Council for the Social Studies,

²⁵ Partnership for 21st Century Skills (P21), *21st Century Skills Map*, available at:

http://www.p21.org/storage/documents/21st_century_skills_english_map.pdf (last visited January 9, 2012).

²⁶ P21 *21st Century Skills Map*, *supra* note 66. See also the Statement of Need and Reasonableness, pages 31-32.

²⁷ *Criteria for Standards in History/Social Studies/Social Sciences*. American Historical Society Teaching Division, Approved by American Historical Society Council, American Historical Association.

theories, and develop and communicate alternative explanations or solutions for contemporary social issues.²⁸

The standards reflect the recommendations of these groups for increasing emphasis on skill development in social studies.

Unlike the identification of foundational skills within the social studies, there is less agreement about the content knowledge that is most essential and appropriate at any given grade level. The standards committee carefully consulted standards from each of the 50 states, national standards documents, national assessment frameworks and other guiding documents to make decisions about specific content that would adequately prepare students for college and careers. College instructors on the standards committee, as well as expert reviewers, indicated that Minnesota's proposed social studies are rigorous and will adequately prepare students for citizenship, college and careers.²⁹

J. Measurability of the Standards

1. A commenter said that since the standards begin with the phrase, "The student will understand..." it is questionable that these are outcomes which can be objectively measured.

Response: As discussed in Part D of this Response, the standards are implemented and supplemented by grade-level *benchmarks*. The benchmarks implement the standards by specifying the academic knowledge and skills that schools must offer and students must achieve to satisfactorily complete a state standard. Benchmarks inform and guide parents, teachers, and others and are used in developing tests. Although there is no state test in social studies,³⁰ schools must assess students on the benchmarks to determine if they have satisfactorily completed a standard. Feedback from educators about the proposed standards does not indicate any concern about assessment of the standards and benchmarks.

K. Rigor of the Standards

1. Commenters stated that the proposed standards appear to be less rigorous than the 2004 standards.

Response: The department disagrees with the assertion that the proposed standards are less rigorous than the 2004 standards. The proposed standards contain fewer standards and benchmarks than the 2004 standards, but the quantity of standards and benchmarks is not a valid indicator of rigor.

The 2011 standards have been specifically designed to incorporate college and career readiness knowledge and skills as discussed in Part H of this Response. The proposed standards require students to understand the concepts, principles and perspectives that shape the social studies disciplines. Students are asked to address concepts at higher

²⁸ Minnesota Transfer Curriculum, Goal 5: History and the Social and Behavioral Sciences, available at: http://www.mntransfer.org/transfer/mntc/t_sample.php.

²⁹ See, for example, comments submitted by expert reviewers Alfred Andrea, Michelle Herczog and Peter Stearns.

³⁰ Minn. Stat. § 120B.023, Subd.1.

levels of Bloom's Taxonomy, for example "evaluation" or "synthesizing" information instead of merely "identifying" or "describing" it.³¹ In addition to mastering a body of knowledge, students are required to apply their understanding to complex situations and contexts. The standards also require students to *think critically* about important issues and *communicate* their findings, and engage in the processes of *problem solving* and *discipline-based inquiry*. The proposed standards require students to use geospatial technologies to a much greater extent than what was demanded in the 2004 standards. Economic concepts and skills have been enhanced with added focus on financial literacy.

L. Objectivity versus bias in the standards

1. Commenters expressed concern that the proposed standards reflect a liberal ideological bias. Examples that they cited include omissions in the standards such as "rugged individualism and American Exceptionalism," and the inclusion of the benchmark "Evaluate the effectiveness of political responses to the problems [emphasis added by commenter] of industrialism, monopoly capitalism, urbanization and political corruption. (Development of an Industrial United States: 1870-1920)."

Response: The department disagrees that the proposed standards reflect a bias, liberal or otherwise. Applicants for the standards committee agreed to a list of assumptions for guiding the standards committee's work. Two assumptions included the following:

- 1) The revised standards will be grounded in current research on curriculum, instruction and student learning and reflect a comprehensive, balanced, and developmentally appropriate approach to preparation in the social studies core disciplines.
- 2) The revised standards will not be based solely on the interpretation of religious texts and/or the influence of special interests, but on the preponderance of research that is commonly accepted throughout the social studies academic community.

Extensive feedback provided during the two formal public comment and review periods, analysis provided by the expert reviewers of the standards, and the commissioner's meetings with stakeholder groups indicated that the Committee successfully followed the above assumptions.

The department understands that concerns about liberal bias in the standards may be linked to a desire for an "American Exceptionalism" approach to the standards. Such an approach, however, would be inconsistent with the bulk of research that is commonly accepted throughout the social studies academic community. (The department's response to the requests by commenters in support of "American Exceptionalism" in the standards is provided later in this Response-See Part III, Section A.)

³¹ Bloom, B.S. et al. *Taxonomy of Educational Objectives, Handbook I: Cognitive Domain*. New York, McKay (1956) and Anderson, L., et al., *A Taxonomy for Learning, Teaching and Assessing-A Revision of Bloom's Taxonomy of Educational Objectives*, New York, Addison Wesley Longman, Inc. (2001).

Rather than represent a particular ideology or bias, the standards committee sought to achieve academic balance in the standards by coupling disciplinary knowledge (i.e., the commonly accepted “big ideas” of the disciplines) with sophisticated skills that require students to apply their knowledge in useful ways. Expert reviewer Alfred Andrea, president of the World History Association, affirmed the balance between knowledge and skills in the proposed standards:

“If I might loosely paraphrase the thought of a University of Vermont alumnus, John Dewey, a useful education in a democratic society must strike a balance. It must deliver the knowledge, skills, and modes of perception that this society deems essential to the full development of an informed and engaged citizen, but it must also take into account the interests and experiences of the student. Moreover, in order to assist students in becoming effective citizens, it must introduce them to multiple perspectives and must foster in them the art of critical thinking.³² It seems to me that this set of K-12 social studies standards goes far in establishing a structure for achieving this “democratic ideal of education”³³

M. Reliance on National Standards

1. One commenter voiced concern that the proposed standards reflect an emphasis on national/federal standards, and another commenter urged us not to adopt national/federal standards.

Response: The department agrees that the proposed standards do reflect the influence of national standards documents written by national professional content organizations and believes that this is an important source of information for states when they are revising their standards because these national efforts draw on the expertise of some of the top scholars in the field of social studies across the United States (U.S.). Minnesota’s standards committee consulted a variety of sources during the review process. In addition to national standards documents, the Committee consulted national reports on social studies education, “exemplary” standards from other states, The McREL Compendium of Standards, the National Assessment of Educational Progress (NAEP) Frameworks, over 1100 comments submitted by the public, analysis submitted by an unprecedented number of expert reviewers of the draft standards, and advice provided by numerous other content and pedagogy experts. To be clear, the department did not adopt national/federal standards in social studies; the proposed standards are specific to Minnesota and reflect the influence of a variety of sources from within and beyond Minnesota. Comments related to nation-wide standards efforts, such as the Common Core State Standards in English Language Arts (ELA) are outside the scope of this rulemaking proceeding.

Please see the SONAR for more information about national guiding documents and model standards the Committee used during the standards drafting process.

³² Dewey, John, *Democracy and Education*, New York, Macmillan (1916).

³³ *Id.* at p. 114.

N. Inaccuracies in the Proposed Standards

- 1. Some commenters claimed that there are factual errors or historical inaccuracies in the standards.*

Response: The department respectfully disagrees with these commenters. The standards review process included numerous educators at the k-12 and post-secondary level who are masters of their subject matter. In addition, numerous expert reviewers have carefully examined the draft of the standards throughout the process, including those experts who submitted official reports during the "Expert Review Period" as well as those experts who gave feedback at the request of the committee on specific areas. Finally, the standards were informed by over a thousand public comments, so any suggested "inaccuracies" that were flagged during this public comment period would have been addressed. The department may provide further response to this issue in the Rebuttal.

O. Middle School Sequence

- 1. One commenter suggested an alternative sequence for middle school grades.*

Response: The commenter provided an alternative sequence for grades 5-8 that was considered by the Committee but ultimately rejected in favor of the sequence represented in the proposed standards. An in-depth discussion of this topic is provided in the SONAR on p. 70-71.

III. Comments on Specific Topics in the Proposed Social Studies Standards

A. "American Exceptionalism"

- 1. Commenters expressed concerns related to the neutral portrayal of non-American political and economic systems, the consequent failure to highlight "American Exceptionalism" and the specific strengths of America, and the negative portrayal of America's faults.*

Response: The department believes that standards should be written in balanced language. As referenced in the SONAR on page 7, social studies education provides "the understandings, the skills, the thinking, the perspectives and the tools for inquiry" that will be essential for students as they face the challenges of the future world."³⁴ The goal is to provide students with the content knowledge, skills, and dispositions that enable them to draw their own conclusions about the country that they live in.

The term "American Exceptionalism" is problematic because the meaning of this term is not well understood. For the purpose of this response, the department will consider "American Exceptionalism" as a historical perspective that portrays the narrative of American history, government, and economic systems in favorable terms. This seems to be the way that most of the commenters also would define "American Exceptionalism."

³⁴ Yell, Michael M., *Embracing the Future through Social Studies*, Social Education 73(1), p. 6-9, National Council for the Social Studies (2009).

An alternative approach reflected in the proposed standards acknowledges the progress of America, while also calling attention to setbacks that might be underrepresented in an “American Exceptionalism” narrative. The approach provided in the proposed standards presents a balanced narrative of the American story. The proposed social studies standards ask students to examine content about each topic using the objective inquiry methods of a social scientist.

The criteria used to determine whether a country is “exceptional” can vary widely. “Exceptionalism” can be positive or negative, and what is considered “positive” can be very subjective. Examination of different data sets could lead to various answers to the question, “Is America exceptional?” For example, one might say the U.S. is “exceptional” in the low voter turnout rates, but one could also say that the U.S. is “exceptional” in the high education rates for women. It is the important job of the social studies teacher to guide students in becoming critical thinkers who can ask questions, examine evidence, draw conclusions and suggest solutions to problems. If America is “exceptional” in positive ways, then students will draw that conclusion. If there are areas where America is not “exceptional” or “exceptional” in a negative way, then students will draw those conclusions and be challenged to think about the changes that could be made to make the U.S. greater. An essential aim of the study of history is to learn from the past in order to inform our future. American successes are celebrated in the proposed standards. For example, in high school students are required to identify how American democratic principles and ideals influenced other democratic revolutions around the world. The proposed 2011 social studies academic standards seek to both promote American successes as well as critically examine potential solutions to issues.

The proposed standards do not prevent a teacher from highlighting the positive aspects of the United States. Minnesota state statute (as discussed on p. 6 of this Response) requires that schools retain the ability to select the curriculum, the instructional approach, and the form of assessment they will use to address state standards; therefore, the proposed standards are written in a way that honors local control. Likewise, these standards do not prevent a student from reaching the conclusion that American is the greatest country in the world.

Commenters arguing for the perspective of “American Exceptionalism” are requesting that the state standards reinforce a particular set of values. However, standards should not promote a certain set of values. The standards are phrased to encourage students to think critically about topics presented to them. For example, comparative study of different forms of government is an important exercise for students. The proposed social studies standards include a standard and supporting benchmarks that ask students to compare the government of the U.S. with other forms of government like communism and understand how the U.S. interacts with these various governments. The relevant civics standard and supporting benchmarks are listed below:

Civics Standard 12: The student will understand that governments are based on different political philosophies and purposes; governments establish and maintain relationships with varied types of other governments.

Grade 8 Civics Benchmark 8.1.5.13.1: Explain how different types of governments reflect historically and culturally specific understandings of the relationships between the individual, government and society.

High School Civics Benchmark 9.1.5.12.1: Compare the philosophies, structures and operations of different types of governments in other countries with those in the United States.

This civics standard and supporting benchmarks ask students to evaluate different forms of government and draw conclusions based on the effectiveness of different regimes. The standard is written in a value neutral way to foster conversation among students and educators, which allows for a variety of viewpoints and suggestions to be discussed, rather than promoting one view that sets forth a certain value set.

2. Some commenters expressed concern related to “American Exceptionalism” and America’s form of economic system, the lack of reference to the benefits of American capitalism, and the significant scientific and other positive innovations from the U.S.

Response: The standards not only ask students to do comparative analysis of different forms of government, but they also ask students to compare different forms of economic systems and evaluate their effectiveness. Academic standards should not promote a particular set of values or a political agenda, therefore the standards need to be presented in a balanced way. Economics Standard 4 and the supporting benchmarks in grade 8 ask students to think critically about economic systems. The relevant standard and supporting benchmarks are listed below:

Economic Standard 4: The student will understand that economic systems differ in the ways that they address the three basic economic issues of allocation, production and distribution to meet society’s broad economic goals.

Grade 8 Economics Benchmark 8.2.3.4.1: Identify factors which affect economic growth (percentage changes in Gross Domestic Product—GDP) and lead to a different standard of living in different countries.

Grade 8 Economics Benchmark 8.2.3.4.2: Identify characteristics of command, mixed, and market-based (capitalist) economies; classify the economic systems of countries in a given region.

In mastering these two grade 8 Economics benchmarks, as well as three similar benchmarks in high school, students will be analyzing evidence and drawing conclusions about whether the Communist economic system serves the needs of its citizens and how the system has impacted the standard of living for people living in communist countries. The high school benchmarks ask students to do the following:

High School Economics Benchmark 9.2.3.4.1: Explain how the availability of productive resources and technology limits the production of goods and services.

High School Economics Benchmark 9.2.3.4.2: Compare and contrast the characteristics of traditional, command (planned), market-based (capitalistic) and mixed economic systems.

High School Economics Benchmark 9.2.3.4.3: Define broad economic goals and describe the trade-offs that exist between them; evaluate how different economic systems achieve these goals in theory and in practice.

These standards and supporting benchmarks ask important questions that prompt students to draw their own conclusions based on content knowledge about America's economic system and other economic systems around the world.

3. Some commenters expressed concern about the lack of "American Exceptionalism" in the U.S. history standards.

Response: Beyond analysis of different forms of political and economic systems, the standards require students to study examples from American history that highlight American efforts to resist the growth of oppressive political regimes and encourage the spread of democracy around the world. A 7th grade U.S. history benchmark incorporates this concept and specifically asks students to:

Grade 7 U.S. History Benchmark 7.4.4.22.1: Identify military and non-military actions taken by the United States during the Cold War to resist the spread of communism. (Post-World War II United States: 1945-1989) For example: Military actions—Korean War, Cuban Missile Crisis, Vietnam War. Non-military actions—Marshall Plan, North Atlantic Treaty Organization, the "Kitchen Debate," the Space Race.

High school history benchmark 9.4.4.22.9 builds on this understanding of the Cold War face-off between competing political ideologies, and asks students determine the actions that were most effective for containing communism and ultimately bringing the Cold War to an end. The benchmark states:

High School U.S. History Benchmark 9.4.4.22.9: Evaluate the effectiveness of United States policies in ending the Cold War. (Post-World War II United States: 1945-1989)

Both of the benchmarks listed above fall under History Standard 22 which is as follows:

History Standard 22: The student will understand that post-World War II United States was shaped by an economic boom, Cold War military engagements, politics and protests, and rights movements to improve the status of racial minorities, women and America's indigenous peoples between 1945 and 1989.

The department disagrees that "American Exceptionalism" is absent from the proposed social studies standards. As a whole, the social studies standards and supporting benchmarks provide a positive portrayal of America. With the exception of one economics standard about comparative economics, almost the entire Economics strand

is about American capitalism. The standards and supporting benchmarks for Civics focus almost entirely on American civics, and many of the civics standards and benchmarks highlight the rights and democratic principles that many in the world have tried to emulate in their struggles for democracy. Almost half of the history standards and supporting benchmarks focus on U.S. history, while the other half focus on world history. Within the world history standards and supporting benchmarks there are also multiple benchmarks that relate to European and American history. There is also a significant number of geography standards and supporting benchmarks that address the geography of U.S. and Europe. Finally, the U.S. history standards include positive references to America's strengths, while also addressing its struggles and setbacks.

Every history standard characterizes an era by including both examples of progress during that time period as well as significant struggles. This is reasonable because many people argue that the United States is truly "exceptional" because of its continual efforts to address issues in American society, and provide greater access to American democracy. It is important to acknowledge that what makes America great are the battles that have been won to provide greater political, economic, and social equality, in addition to the struggles to spread liberty and democratic values throughout the world. The proposed standards ask students to examine both, thus providing a balanced approach to social studies. An example is U.S. History Standard 22, excerpted above, where students are asked to identify American efforts to overcome internal dissent and oppression in the U.S. Another example is U.S. History Standard 17 illustrates this balanced approach and makes reference to the "new nation based on the ideals of self-government and liberty."

U.S. History Standard 17: The student will understand that the divergence of colonial interests from those of England led to an independence movement that resulted in the American Revolution and the foundation of a new nation based on the ideals of self-government and liberty between 1754 and 1800.

In high school, a supporting benchmark supports this standard by asking students to:

High School U.S. History Benchmark 9.4.4.17.2: Analyze the American revolutionaries' justifications, principles and ideals as expressed in the Declaration of Independence; identify the influence of the Declaration of Independence on other revolutions around the world by analyzing the American revolutionaries' justifications, principles and ideals as expressed in the Declaration of Independence and identifying the sources of these principles and ideals and their impact on subsequent revolutions in Europe, the Caribbean, and Latin America. (Revolution and a New Nation: 1754-1800).

B. Western Civilization and Global Emphasis

1. Some commenters expressed concern related to the lack of emphasis on Western Civilization contributions and an overemphasis on global perspectives.

Response: Minnesota statutes section 120B.024(a)(4) requires students in high school to complete 3.5 credits of social studies to graduate, which must include

civics/government, economics, geography, U.S. history, and world history. This mandate specifically requires educators to address World History instead of European history. Furthermore, there is movement in the social studies field to incorporate a greater global emphasis into social studies standards. Recommendations of countless institutions across the political spectrum as well as changing requirements from colleges and universities emphasize a more global approach. The 21st century world requires students to have a global perspective in order to function successfully in our highly interconnected world. The SONAR, on p.35, provides further explanation about this shift from a focus on Western Civilization to a more global study of the world.

Given the state mandate for World History and the emphasis on the global perspective in the greater social studies field, the high school standards focus on the breadth of world history, which includes study of Europe/Western Civilization, instead of focusing more narrowly on just Western Civilization.

The department respectfully disagrees with commenters who have suggested that the contributions of Western Civilization are absent from the proposed social studies standards. Despite the focus on world history as required by state statute, the proposed 2011 social studies standards have supporting benchmarks related to the contributions of Western Civilization within each time period. For example, students are asked to understand topics like the significance of the Greek and Roman civilizations, the development of Christianity, the “Great Schism” in Christianity, the exchange of ideas which was prompted by the Enlightenment and Renaissance, the Reformation and Counter-Reformation, trans-oceanic exploration, and the Columbian exchange in benchmarks 9.4.3.8.2, 9.4.3.8.3, 9.4.3.9.5, 9.4.3.9.7, 9.4.3.10.2, and 9.4.3.10.3, respectively.

The shift in these proposed standards from a focus on Western Civilization toward a global study of the world is supported in post-secondary education. What used to be called Western Civilization at the college level is now more accurately called “European Civilization.” To focus the high school world history standards and benchmarks so much on one continent minimizes the contributions of the rest of the world. In addition, the proposed standards follow current scholarship in the field of world history which emphasizes broad patterns in human development and connections and interactions among human societies across time and space. The proposed standards are designed to give students a much broader perspective of world history. For example, the proposed World History Standards 9 and 10 require students to situate the contributions of Western Civilizations like the “Renaissance” in wider global context.

World History Standard 9: The student will understand that hemispheric networks intensified as a result of innovations in agriculture, trade across longer distances, the consolidation of belief systems, and the development of new multi-ethnic empires while diseases and climate change caused sharp, periodic fluctuations in global population between 600 and 1450.

World History Standard 10: The student will understand that new connections between the hemispheres resulted in the “Columbian Exchange,” new sources

and forms of knowledge, development of the first truly global economy, intensification of coerced labor, increasingly complex societies, and shifts in the international balance of power between 1450 and 1750.

While learning World History Standards 9 and 10 above, students will study the Renaissance under benchmarks 9.4.3.9.7 and 9.4.3.10.2, but the word “Renaissance” is not specifically mentioned in either benchmark. (A simple word search might prompt one think that the Renaissance has been omitted from the standards, but this is not the case.) However, “Renaissance” is listed as an example in benchmark 9.4.3.9.7:

High School World History Benchmark 9.4.3.9.7: Describe the intensified exchanges of scientific, artistic and historical knowledge among Europe, Africa and Southwest Asia; evaluate the impact on Christian and Islamic societies. (Post-Classical and Medieval Civilizations and Expanding Zones of Exchange: 600-1450). *For example:* Dar al Islam, Crusades, Renaissance.

Another example of the shift towards a more global approach to social studies is high school world history benchmark 9.4.3.10.6 which requires students to examine the slave trade not only from the American or “Western” perspective but within the broader global context. This world history benchmark reads:

High School World History Benchmark 9.4.3.10.6: Compare and contrast the forms of slavery and other non-free labor systems among African, European and Arab societies; analyze the causes and consequences of chattel slavery in the Atlantic. (Emergence of the First Global Age: 1450-1750).

Professional historians have a broad understanding of world history that is rooted in global understanding, rather than a focus on Western Civilizations. Thus, the proposed standards require Minnesota students to develop the same skills and practices that are applied in the field by professional scholars. Alfred Andrea, president of the World History Association, Professor Emeritus of the University of Vermont, and expert reviewer for these proposed standards during development, stated the following:

“And allow me to state immediately that world historians are not involved in some massive conspiracy to eliminate U.S. history or Western Civilization from the curricular canon. Quite to the contrary. We are all trained in areas of special interest and balance these areas of specialized, micro-historical research with the macro-history of world history. Indeed, the guild of world historians contains a number of eminent specialists in U.S. history who are in the vanguard of placing the history of the United States, from its origins to today, into a broader global context.”

C. The Role of Religion

1. Commenters expressed concern about the use of BCE/CE instead of BC/AD for indicating periods of history in the proposed standards.

Response: World historians have moved away from the convention of “BC” (Before Christ) and “AD” (Anno Domini) to denote time periods in history. Instead the field has adopted a more culturally balanced way of periodizing history that uses “BCE” (Before Common Era) and “CE” (Common Era). In Alfred Andrea’s expert review of an early draft of these proposed standards, he suggested that we include a substrand related to world history terminology (such as Afro-Eurasia, syncretism, and BCE/CE) because, [although] “...historians largely avoid jargon or specialized language, world history does have a few special terms and notions.” Every culture in the world has different ways of marking time, according to milestones in their individual history. Marking chronology in history from the birth of Christ (using BC/AD) makes sense in a Christian world but makes less sense in a global world where there are a variety of chronologies and religious traditions. “BCE” and “CE” have become the standard in the field of world history and remove value judgment about which system of marking time is most important. Thus, the standards committee decided to use the BCE/CE terminology to indicate time periods in the proposed social studies academic standards.

2. Some commenters expressed concerns related to the lack of discussion about the role of religion in History, especially during the founding period of America.

Response: According to the guiding assumptions the standards committee used to develop the 2011 standards, “the revised standards will not be based solely on the interpretation of religious texts and/or the influence of special interests, but on the preponderance of research that is commonly accepted throughout the social studies academic community.” Some social studies scholars argue that Christianity influenced the Founding Fathers as they developed first the Declaration of Independence and later the Articles of Confederation and its ultimate replacement, the Constitution and Bill of Rights. However, the degree to which Christianity has influenced these documents has been a source of scholarly debate for centuries. Documents such as the Treaty of Tripoli make the case that the U.S. is not based on Christianity. This treaty, ratified by the U.S. Senate in 1797, states that, “As the Government of the United States of America is not, in any sense, founded on the Christian religion...” Because of these debates, the proposed social studies standards do not make value judgments or assertions that are not universally accepted within the field.

In addition, there is disagreement in the field of social studies about which version of Christianity was most influential. Some argue that it was really a very narrow brand of “Calvinist Protestantism” that had the greatest impact, but arguably there were influences such as the Quakers, Catholics, and other Christian groups. Thus, the proposed standards do not set forth a specific role that religion or Christianity played in American history or government or the development of America. These are questions that students might examine in their study of the founding period, but not value-based assertions that should be mandated by the state.

Despite the neutral wording of the standards, these proposed standards and supporting benchmarks do provide students opportunities to think about the influence of Christian values on the development of the U.S. There are specific references to topics such as

The Mayflower Compact (Civics Benchmarks 5.4.4.17.1 and 9.1.2.3.1) and, the First Great Awakening (High School U.S. History Benchmark 9.4.4.16.7), and the Second Great Awakening (High School U.S. History Benchmark 9.4.4.18.5) as examples in the supporting benchmarks. Although these topics are not specifically listed in the language of the proposed standards or supporting benchmarks, they are offered as examples related to particular benchmarks. These examples provide teachers with content suggestions they can include in their curriculum when highlighting the role of Christian values in American history. Another example of how a teacher might choose to highlight the role of Christianity in the development of the U.S. might be through the study of Rev. Martin Luther King, Jr. and the important role that churches played in the Civil Rights Movement. Other benchmarks from grade 5 through high school provide similar opportunities for students to examine the influence of Christianity, if a teacher or student chose to focus on that aspect of American development. These benchmarks are as follows:

Grade 5 U.S. History Benchmark 5.4.4.17.2: Describe the development of self-governance in the British colonies and explain the influence of this tradition on the American Revolution. (Revolution and a New Nation: 1754-1800)

Grade 7 U.S. History Benchmark 7.4.4.18.3: Identify causes and consequences of Antebellum reform movements including abolition and women's rights. (Expansion and Reform: 1792-1861)

High School U.S. History Benchmark 9.4.4.16.2: Compare and contrast the motivations for exploration, conquest and colonization in North America by different European nations. (Colonization and Settlement: 1585-1763)

High School U.S. History Benchmark 9.4.4.16.3: Identify the varied economic, political and religious motives of free and indentured European immigrants who settled in North America. (Colonization and Settlement: 1585-1763)

High School U.S. History Benchmark 9.4.4.16.7: Describe the growth of colonial societies in British North America, including the evolution of representative forms of government, increased ethnic and religious pluralism, and changing concepts of racial identity, gender roles and family organization. (Colonization and Settlement: 1585-1763)

High School U.S. History Benchmark 9.4.4.18.5: Analyze the strategies, goals and impact of the key movements to promote political, cultural (including artistic and literary), religious and social reform. (Expansion and Reform: 1792-1861)

Since its inception over 200 years ago, the United States has become a more religiously pluralistic country. While Christianity remains the predominant religion in America today, there are many other forms of religion that have shaped our leaders and events in more recent times. Thus to reflect this change in America and to be inclusive of the backgrounds of all Minnesota students, the proposed standards do not make assertions

based on values representing one religion or cultural group, at the exclusion of other groups.

3. Some commenters expressed concerns related to the source and nature of rights, including “unalienable rights,” and lack of the inclusion of these rights in the proposed standards.

Response: Several commenters suggest that the proposed standards should ask students to make the distinction between “God-granted rights” and rights granted by the government. The United States’ legal system *recognizes* rights, but does not *grant* rights. The proposed social studies standards deliberately do not identify the *source* of rights in order to avoid making assertions based on a certain set of values. Some believe that rights come from God, but this is a religious belief and not a widely accepted fact within the social studies academic community. One of the guiding assumptions that the standards committee’s followed throughout the review process was “the revised standards will not be based solely on the interpretation of religious texts and/or the influence of special interests, but on the preponderance of research that is commonly accepted throughout the social studies academic community.” It is a parents’ prerogative to teach their children about the source of rights if they so choose, but it is not appropriate for the state to mandate that particular religious beliefs be taught in a public education setting.

At least three of the twelve Civics and Government standards address the rights of individuals in the U.S., including those rights that fall under the broad term of “unalienable rights,” such as life, liberty, and the pursuit of happiness (see Civics Standards 3, 4, and 5 listed below). The proposed standards use the term “inalienable rights” in place of the term “unalienable rights.” The two terms are synonymous. Although not specifically identified as the concepts of inalienable rights are included at both the standards and benchmark levels. In addition, the concept of “liberty” is included in both Civics Standard 3 and History Standard 17. Civics Standards 3, 4, and 5, and History Standard 17 are listed below.

Civics Standard 3: The student will understand that the United States is based on democratic values and principles that include liberty, individual rights, justice, equality, the rule of law, limited government, common good, popular sovereignty, majority rule, and minority rights.

Civics Standard 4: The student will understand that individuals in a republic have rights, duties, and responsibilities.

Civics Standard 5: The student will understand that citizenship and its rights and duties are established by law.

History Standard 17: The student will understand that the divergence of colonial interests from those of England led to an independence movement that resulted in the American Revolution and the foundation of a new nation based on the ideals of self-government and liberty between 1754 and 1800.

The following Civics benchmarks include examples that address the concepts of “inalienable rights”:

Grade 7 Civics Benchmark 7.1.2.3.1: Identify examples of how principles expressed in the Declaration of Independence and Preamble to the Constitution have been applied throughout United States history, including how they have evolved (if applicable) over time. *For example:* Equality, liberty, First Amendment rights, criminal rights, civil rights.”

Grade 7 Civics Benchmark 7.1.3.6.2: Compare and contrast the rights and responsibilities of citizens, non-citizens and dual citizens. *For example:* Voting, paying taxes, owning property.”

“Inalienable rights” are also listed as an example of a content topic in Grade 5 benchmark 5.4.4.17.5 that teachers could use to teach students about civics and government.

Grade 5 Civics Benchmark 5.4.4.17.5: Describe the purposes of the founding documents and explain the basic principles of democracy that were set forth in the Declaration of Independence, the Constitution and the Bill of Rights. (Revolution and a New Nation: 1754-1800). *For example:* Consent of the governed, social contract, inalienable rights, individual rights and responsibilities, equality, rule of law, limited government, representative democracy.

In addition, Economics benchmark 9.2.4.8.2 makes reference to property rights:

High School Economics Benchmark 9.2.4.8.2: Identify and analyze market failures caused by poorly-defined or poorly-enforced property rights, externalities, and public goods; evaluate the rationale and effectiveness of government attempts to remedy these problems.

Thus, the concept of “inalienable rights” is addressed in the proposed social studies standards, supporting benchmarks, and examples in many different ways. Commenters may have mistakenly assumed that this topic is not included in the proposed standards, if they relied on a simple word search of the document using the term “unalienable rights.” The term “inalienable rights” is used instead. In order to find all references to “inalienable rights,” one needs to include the specific values and principles referenced in the standards that are associated with this broad term.

IV. Specific Comments Related to Each Discipline

The following section discusses concerns received during the comment period about specific disciplines in the proposed social studies standards, including Civics and Government, Geography, U.S. and World History and Economics. Because many of the disciplines are interrelated, responses to a concern in one discipline may reference information about other disciplines within social studies. For example, a response to a concern about a Civics and Government standard may reference a U.S. history or Economic standard that responds to the concern.

A. Comments Related to the Proposed Civics and Government Standards.

1. Several commenters expressed concern related to the lack of discussion of liberty and its importance as an unalienable right.

Response: Liberty is specifically listed as a core democratic principle in Civics Standard 3.

Civics Standard 3: The student will understand that the United States is based on democratic values and principles that include liberty, individual rights, justice, equality, the rule of law, limited government, common good, popular sovereignty, majority rule, and minority rights.

In addition, Civics Standards 4 and 5 address the inherent rights of individuals, which include liberty:

Civics Standard 4: The student will understand that individuals in a republic have rights, duties, and responsibilities.

Civics Standard 5: The student will understand that citizenship and its rights and duties are established by law.

The Civics supporting benchmarks are more specific than the standards in what they ask students to know about their rights, but the proposed standards and supporting benchmarks do not specifically identify all of the rights of individuals in the U.S. It is also important to note that “life, liberty, and the pursuit of happiness” are all identified as rights in the Declaration of Independence, but this document does not provide the legal foundation for the U.S. government. Thus, the specific rights identified in the supporting benchmarks under Civics Standards 4 and 5 focus on those rights recognized in the Constitution and Bill of Rights. Civics benchmarks for grades 5 and 6 are listed below:

Grade 5 Civics Benchmark 5.1.3.5.1: Explain specific protections that the Bill of Rights provides to individuals and the importance of these ten amendments to the ratification of the United States Constitution.

Grade 6 Civics Benchmark 6.1.3.5.1: Describe the establishment and expansion of rights over time, including the impact of key court cases, state legislation and constitutional amendments.

2. Several commenters expressed concern that the proposed standards lacked mention to first amendment rights.

Response: Over the course of K-12 there are multiple opportunities for students to look at rights, including those recognized in the First Amendment to the Constitution (the Bill of Rights). For example, starting in second grade students are introduced to the concept of rights in a way that is developmentally appropriate and provides the conceptual understanding necessary for understanding rights in later grades. The supporting benchmark asks students to:

Grade 2 Civics Benchmark 2.1.4.8.1: Compare and contrast student rules, rights and responsibilities at school with their rules, rights and responsibilities at home; explain the importance of obeying rules.

Subsequently, in grade seven, students are asked to:

Grade 7 Civics Benchmark 7.1.4.8.1: Analyze how the Constitution and the Bill of Rights limits the government and the governed, protects individual rights, supports the principle of majority rule while protecting the rights of the minority, and promotes the general welfare.

As mentioned above, three civics standards (Civics Standards 3, 4, and 5) relate to the rights of individuals. Although the proposed standards do not specifically mention First Amendment rights (or any other specific rights), teachers will certainly use the rights identified in the first amendment to illustrate the concepts of the standards and supporting benchmarks listed above. There also is one supporting benchmark in high school that specifically asks students to examine the First Amendment. This benchmark reads as follows:

High School Civics Benchmark 9.1.3.4.2: Explain the scope and limits of rights protected by the First and Second Amendments and changes created by legislative action and court interpretation.”

Finally, “First Amendment rights” are specifically mentioned in examples for several civics benchmarks, including 5.1.3.5.1 (see previous page of this Response), 7.1.1.1.1, and 7.1.2.3.1 (see p. 29 of this Response). Civics benchmark 7.1.1.1.1 is listed below:

Grade 7 Civics Benchmark 7.1.1.1.1: Exhibit civic skills including participating in civic discussion on issues in the contemporary United States, demonstrating respect for the opinions of people or groups who have different perspectives, and reaching consensus. *For example:* Civic skills—speaking, listening, respecting diverse viewpoints, evaluating arguments. Controversial issues—First Amendment in the school setting, mandatory voting.

3. Several commenters expressed concern related to the lack of emphasis on principles of American democracy, the lack of reference to foundational documents such as the Declaration of Independence, and the reference to these founding documents as “artifacts.”

Response: There are multiple references in the proposed standards to “foundational documents” which include the Declaration of Independence. For example, a high school benchmark asks students to:

High School Civics Benchmark 9.1.2.3.1: Define and provide examples of foundational ideas of American government which are embedded in founding era documents: natural rights philosophy, social contract, civic virtue, popular sovereignty, constitutionalism, representative democracy, political factions, federalism and individual rights.

There is also one benchmark under Civics Standard 3 that specifically mentions the Declaration of Independence. This grade 7 benchmark is as follows:

Grade 7 Civics Benchmark 7.1.2.3.1: Identify examples of how principles expressed in the Declaration of Independence and Preamble to the Constitution have been applied throughout United States history, including how they have evolved (if applicable) over time.

A history benchmark in grade five also makes reference to foundational documents, including the Declaration of Independence. This supporting benchmark reads:

Grade 5 U.S. History Benchmark 5.4.4.17.5: Describe the purposes of the founding documents and explain the basic principles of democracy that were set forth in the Declaration of Independence, the Constitution and the Bill of Rights.” (Revolution and a New Nation: 1754-1800)

Likewise, a high school benchmark asks students to:

High School U.S. History Benchmark 9.4.4.17.2: Analyze the American revolutionaries’ justifications, principles and ideals as expressed in the Declaration of Independence; identify the sources of these principles and ideals and their impact on subsequent revolutions in Europe, the Caribbean, and Latin America.” (Revolution and a New Nation: 1754-1800)

As mentioned previously, the Declaration of Independence, while an important document for establishing the democratic principles upon which this country is founded, does not provide the legal basis for the U.S. government. Thus, the majority of the civics standards and supporting benchmarks focus on the Constitution and Bill of Rights.

One commenter argued that there is no mention of the Articles of Confederation or the Bill of Rights, the Constitutional Convention, the ratification conventions, or the Federalist Papers. These concepts are all addressed in supporting benchmarks and examples which are outside the scope of this rulemaking process. The Bill of Rights is addressed extensively in the supporting benchmarks under Civics Standard 4. The other concepts are addressed under History Standard 17. Supporting benchmarks this standard such as the following grade five and high school benchmarks ask students to analyze the first government of the United States under the Articles of Confederation, the reasons for its failure, the debates around the development of a new government, and the eventual replacement with the Constitution and Bill of Rights.

Grade 5 U.S. History Benchmark 5.4.4.17.6: Describe the successes and failures of the national government under the Articles of Confederation and why it was ultimately discarded and replaced with the Constitution. (Revolution and a New Nation: 1754-1800)

Grade 5 U.S. History Benchmark 5.4.4.17.7: Describe the major issues that were debated at the Constitutional Convention. (Revolution and a New Nation: 1754-1800)

High School U.S. History Benchmark 9.4.4.17.4: Analyze the arguments about the organization and powers of the federal government between 1783 and 1800, including the debates over the Articles of Confederation, the Constitution and the Bill of Rights; explain the origins of the two-party political system and the significance of the election of 1800. (Revolution and a New Nation: 1754-1800)

One commenter objected to the language of Civics Standard 2 because of the reference to foundational documents as “artifacts.” The term “artifact” does not necessarily mean outdated, and in no way is meant to imply that the founding documents are irrelevant to today’s students. Civics Standard 2 is as follows:

Civics Standard 2: The student will understand that the civic identity of the United States is shaped by historical figures, places, and events, and by key foundational documents and other symbolically important artifacts.

Webster’s dictionary describes an artifact as “something created by humans, usually for a practical purpose; especially an object remaining from a particular period” OR “something characteristic of or resulting from a particular human institution, period, trend, or individual.” The language of this standard was meant to guide students to a deeper appreciation for the documents, symbols, songs, and traditions that represent the U.S. and instill a sense of patriotism. However, if the language of the standard is confusing or misleading, the department suggests removing the word “other” from the standard. Thus, the new standard would read as follows: Civics Standard 2: “The student will understand that the civic identity of the United States is shaped by historical figures, places, and events, and by key foundational documents and symbolically important artifacts.”

4. Another commenter suggested that the proposed standards should emphasize “pursuit of happiness” as an American right, in lieu of “equal outcome.”

Response: As previously mentioned, “pursuit of Happiness” is not enunciated in American law (the Constitution and Bill of Rights), but instead in the Declaration of Independence. In addition, specific rights are not identified in the proposed standards or supporting benchmarks so there is no reference to “equal outcomes” as a specific right of Americans.

5. Several commenters expressed concern that the certain civic values and principles were not included in the proposed standards

Response: Many civic values and principles are included in the proposed social studies standards and supporting benchmarks. For example, Civic Standard 3 reads:

Civics Standard 3: The student will understand that the United States is based on democratic values and principles that include liberty, individual rights, justice, equality, the rule of law, limited government, common good, popular sovereignty, majority rule and minority rights.”

One commenter objected to specific principles that were included in this standard, and made suggestions for other principles that should be added.

The standards committee consulted numerous resources in the development of the civics standards, as outlined in the SONAR. These included documents and scholarship from organizations across the political spectrum including the P21 the report *Guardians of Democracy* from the organization Campaign for the Civic Mission of Schools, the *National Standards for Civics and Government* from the Center for Civic Education, and the framework of the National Assessment of Educational Progress. All of these resources were helpful in determining the civic values that should be specifically included in standard 3, as well as identifying values to include at the benchmark level and those that were best left to local curriculum decisions or parents.

Many of the principles included in Civics Standard 3 are drawn directly from the foundational documents of American democracy. For example, “justice” is included in the preamble to the Constitution. “We the People of the United States, in Order to form a more perfect Union, establish Justice, insure domestic Tranquility, provide for the common defense, promote the general Welfare, and secure the Blessings of Liberty to ourselves and our Posterity, do ordain and establish this Constitution for the United States of America.”

Civics Standard 3 does not provide an exhaustive list of American values and principles; other values and principles are also included in the supporting benchmarks and examples or may be included in local curriculum decisions. For example, one commenter wanted the inclusion of virtue as a civic value, and this is addressed in high school benchmark 9.1.2.3.1 which reads:

High School Civics Benchmark 9.1.2.3.1: Define and provide examples of foundational ideas of American government which are embedded in founding era documents: natural rights philosophy, social contract, civic virtue, popular sovereignty, constitutionalism, representative democracy, political factions, federalism and individual rights.

Other commenters suggested including the term “patriotism.” This is an example of a civic value that is not explicitly mentioned in the standards, but there are certainly multiple opportunities for students to address this concept in multiple standards and benchmarks throughout K-12. The civics standards as a whole are meant to give students a better understanding of their government, instill a sense of patriotism and civic identity, and empower them to work towards the good of the country. From an early age, students are asked to understand how the civic identity of the U.S. is shaped in Civics Standard 2:

Civics Standard 2: The student will understand that the civic identity of the United States is shaped by historical figures, places and events, and by key foundational documents and other symbolically important artifacts.”

A first grade benchmark under this standard that supports learning about civic identity is as follows:

Grade 1 Civics Benchmark 1.1.2.2.1: Explain why and when the Pledge of Allegiance is recited; provide examples of basic flag etiquette.

This benchmark about why we say the Pledge of Allegiance (the Pledge) and conduct flag etiquette addresses the substance of patriotic values. The Committee deliberately placed this supporting benchmark at grade one because this is the same grade level that students are likely to memorize the Pledge and say it in class (as prescribed by state law), so having a better understanding of the Pledge would make the practice of that patriotic gesture meaningful. In addition, there was only one reference to “patriotism” in the 2004 standards and it also took place in grade one. Thus, the concept of patriotism is still present in the standards and supporting benchmarks.

In the 2010 NAEP Framework, it states that, “The values and principles of American constitutional democracy are sometimes in conflict, and their very meaning and application are often disputed.” It goes on to say that, “a constitutional democracy is a way of allowing the competing ideas, values, goals, and interests of people, individually or in groups, to compete with one another in a peaceful manner.” The Department recognizes that there may be disagreement about which values are highlighted in the standards, but this is part of democracy in action.

6. Some commenters expressed concern about the use of the word “democracy” instead of the word “republic” in the proposed social studies standards.

Response: Both of the terms “democracy” and “republic” are used in the 2011 standards, as American government is a blending of the two political systems. Civics Standard 1 and 4 listed below illustrate this point through the use of the terms “democratic government” and “republic.”

Civics Standard 1: The student will understand that democratic government depends on informed and engaged citizens who exhibit civic skills and values, practice civic discourse, vote and participate in elections, apply inquiry and analysis skills, and take action to solve problems and shape public policy.

Civics Standard 4: The student will understand that individuals in a republic have rights, duties and responsibilities.

Both terms also are used at the benchmark level. For example a high school benchmark reads:

High School Civics Benchmark 9.1.2.2.2: Identify the sources of governmental authority; explain popular sovereignty (consent of the governed) as the source of legitimate governmental authority in a representative democracy or republic.

The term "representative democracy" is another way of saying "republic".

Democracy is rule by the people. The U.S. is not a direct democracy, in which all people vote or participate directly in decision-making on every public policy issue. The Founding Fathers were leery of pure democracy and thus set up a republic that would avoid rule by the masses through a constitutional democracy that limits the power of the majority. However, over time the U.S. government has become more democratic—limiting the power of the national government and allowing more people to participate in electing their representatives. The seventeenth amendment allowing for the direct election of Senators is another example of the U.S. becoming more democratic. There also are elements of direct democracy in U.S. government. For example, at the state and local levels there are measures of direct democracy as illustrated by procedures such as the initiative, referendum and tax levies.

A republic is rule by elected officials, who represent the will of the people as they make policy decisions. However, not all republics are very democratic. Rome was a republic but only few people were allowed to vote in elections. The USSR (Union of Soviet Socialist Republics) was also an example of a republic, as is the Peoples' Republic of China. Thus, to use only the term “republic” to define American government would be misleading. The U.S. is a kind of republic, but one in which democratic values have led to universal suffrage.

The two forms of government are not synonymous, but there are areas of overlap. The U.S. is considered a representative democracy, which is considered a form of a republic. Some also call it a democratic republic. These proposed standards do not make the claim that the U.S. is a direct democracy, because this would be false. The standards do include language that captures the many elements of American democracy, and offer multiple opportunities for students to study the nuances of “democracy” and “republic” within the standards, benchmarks and local curriculum decisions.

For example, Civics Standard 12 requires students to do comparative study of different kinds of government:

Civics Standard 12: The student will understand that governments are based on different political philosophies and purposes; governments establish and maintain relationships with varied types of other governments.

A corresponding grade 8 benchmark asks students to further examine different types of governments:

Grade 8 History Benchmark 8.1.5.13.1: Explain how different types of governments reflect historically and culturally specific understandings of the relationships between the individual, government and society.

This benchmark presents an opportunity for students to explore the differences between direct democracies, representative democracies, and republics.

A high school benchmark also asks students to compare different types of governments, thus, giving students another opportunity to explore the nuances between republics and democracies.

High School Civics Benchmark 9.1.5.12.1: Compare the philosophies, structures and operations of different types of governments in other countries with those in the United States.

7. One commenter objected to Grade 6 benchmarks suggesting that the government is the final arbiter of conflicts.

Response: Benchmarks are outside the scope of this rulemaking process. In addition, the department is unclear as to what this is referencing, as there is no language in the grade 6 benchmarks related to who is “arbiter” of conflicts. It seems that the commenter may be implying that God is the final arbiter of conflicts, but this is difficult to determine from the comments submitted.

8. One commenter expressed concern that that the civics and government standards were getting pushed aside at the expense of other disciplines, specifically geography.

The standards committee analyzed the 2004 standards according to information provided in national standards documents in each discipline, “exemplary” standards from other states, national assessment frameworks, and other guiding documents. This analysis helped the Committee determine the appropriate balance among the social studies disciplines at each grade level in Kindergarten through grade 8.

Compared to the 2004 standards, the 2011 standards contain a reduced number of civics standards and benchmarks at the elementary, middle, and high school levels. Geography also experienced a reduction at each grade level. If any discipline gained “at the expense of civics” it was economics, which made slight gains in the K-8 grade levels. At the elementary level, both economics and history increased their overall number of benchmarks. The SONAR provides ample support for the addition of new economics content, beginning on p. 45, including a new mandate to include personal finance in economics and research showing that students do not have the necessary economic literacy skills necessary for life in the global marketplace.

Compared to the other disciplines, economics had been underrepresented in the 2004 elementary standards, so this change brought the volume of economics content into line with the other social studies disciplines. Again, the SONAR provides further explanation on the balanced “social studies” approach at the elementary level on p. 68.

At the middle school level, economics experienced a slight increase, but the other three disciplines (Civics, Geography, and History) all experienced reductions in the number of benchmarks. At the high school level, all four disciplines reduced their numbers of benchmarks between 24% (geography) to 41% (economics). In high school, economics experienced the greatest reduction. Civics was reduced by 33% from 52 benchmarks in 2004 to 35 benchmarks in 2012. Geography had fewer benchmarks in the 2004 standards so their reduction was less dramatic, from 34 to 26 benchmarks. All of these reductions in standards and benchmarks were made in response to public feedback that

cited a need for reducing the volume of social studies standards to better align with the amount of instructional time devoted to social studies.

It is true that civics is not designated as the lead discipline at any grade level. There are no lead disciplines in grades K-3; content from all disciplines is presented in a balanced “social studies” approach. At the middle school level, geography is the focus of grade 4, history is the focus of grades 5, 6 and 7; and geography is the focus of grade 8. Economics and civics are not designated as lead disciplines at any grade level but standards and benchmarks from economics and civics are included at each grade level that support the lead discipline and the topic focus for the year.

At the high school level, standards are presented in such a way that school districts may offer stand-alone courses in each discipline. This is not a state mandate, but it is how most districts currently structure their courses at the high school level. The Committee operated under the assumption that districts would continue to offer full-year courses in U.S. history and world history, and half-year courses in geography, economics, and civics. This assumption was based on survey data of current practices in school districts across Minnesota. Of course, many differences still exist in terms of the courses, sequence, and content offered from one district to another. There are districts that will be reducing their civics high school course from a year-long course to a half-year course in response to the new standards. However, this is a local district decision and not universal across all districts in the state.

B. Comments on Geography Themes.

1. Some commenters expressed concerns related to the lack of content knowledge in both national and world geography present in the proposed standards.

Response: The department respectfully disagrees with commenters who argue that there is a lack of content related to geography in the proposed social studies standards. The proposed standards include a separate strand devoted to geography, and include at least one geography standard and supporting benchmarks at every single grade level from kindergarten through grade 8. Geography has the same number of benchmarks as the other disciplines in K-3. It is the “lead discipline” in grades 4 and 8, meaning that Geography has more benchmarks than any of the other social studies disciplines at that grade level. There are also benchmarks for geography at the high school level which are the equivalent of one half-credit (or semester) course of geography. These standards position students to develop a strong background in geographic concepts and skills.

2. Some commenters expressed concerns related to climate change causing fluctuations in global populations and argued that global warming is not an established fact.

Response:

patterns, is an established scientific occurrence throughout history and is the focus of

History Standard 9: The student will understand that hemispheric networks

One commenter suggested language for new benchmarks that might relate to this standard. However, benchmarks are outside the scope of this rulemaking process. In addition, the Committee worked very hard to reduce the number of benchmarks to a reasonable number that can be taught within the time allowed for social studies instruction so adding more benchmarks at this time is not advisable.

3. Some commenters expressed concerns related to the use of the term “sustainable interaction and development” in the SONAR.

Response: The term “sustainable development” does not appear in the proposed 2011 social studies standards or the supporting benchmarks. However, the term “sustainable interaction” does appear in the SONAR document on p. 52. The SONAR document is not the subject of this rulemaking process, but was a tool used by the department to explain the rationale, reasonableness and necessity of the proposed standards. The commenter did not provide a specific comment or suggestion related to this term and a specific geography standard.

4. Some commenters voiced concerns related to the emphasis on human geography in lieu of physical geography.

Response: Many of the topics related to physical geography are already addressed in the newly revised 2009 science standards under the Earth Science strand. For this reason, the Committee elected to not duplicate the same concepts, but to focus the geography standards on human geography which is not covered in the science (or any other) standards.

C. Concerns Related to the Proposed Economic Standards

1. Some commenters expressed concern related to the neutral portrayal of government intervention in the economy, and the market failures that result from government overregulation.

Response: The standards are deliberately written in a balanced way, so that they are not promoting a particular set of values or a specific political agenda. Study of this topic

will allow students to draw their own conclusions about the role of the U.S. government in the economy.

There are multiple opportunities for students to learn about the role of government in the economy throughout the proposed K-12 social studies standards. Some of the history standards and related benchmarks that provide opportunities for students to learn these concepts are listed below:

History Standard 21: The student will understand that the economic growth, cultural innovation, and political apathy of the 1920s ended in the Great Depression which spurred new forms of government intervention and renewed labor activism, followed by World War II and an economic resurgence between 1920 and 1945.

Two seventh grade benchmarks under this standard specifically ask students to identify the economic causes of the depression and the role of the government, respectively.

Grade 7 U.S. History Benchmark 7.4.4.21.1: Identify causes of the Great Depression and factors that led to an extended period of economic collapse in the United States. (The Great Depression and World War II: 1920-1945)

Grade 7 U.S. History Benchmark 7.4.4.21.2: Describe the impact of the Great Depression on United States society, including ethnic and racial minorities, and how government responded to events with New Deal policies. (The Great Depression and World War II: 1920-1945)

Likewise, in high school students are asked to perform similar tasks as evidenced by the following benchmarks:

High School U.S. History Benchmark 9.4.4.21.2: Analyze the economic causes of the Great Depression and the impact on individuals, communities and institutions. (Great Depression and World War II: 1920-1945)

High School U.S. History Benchmark 9.4.4.21.3: Analyze how the New Deal addressed the struggles of the Great Depression and transformed the role of government. (Great Depression and World War II: 1920-1945)

In addition, Economics Standard 8 and the supporting benchmarks also incorporates this topic:

Economics Standard 8: The student will understand that market failures occur when markets fail to allocate resources efficiently or meet other goals and this often leads to government attempts to correct the problem.

Three high school benchmarks specifically address the issue raised by these commenters.

High School Economics Benchmark 9.2.4.8.1: Identify and analyze market failures caused by a lack of competition, lack of resource mobility (barriers), and

lack of perfect information; evaluate the rationale and effectiveness of government attempts to remedy these problems.

High School Economics Benchmark 9.2.4.8.2: Identify and analyze market failures caused by poorly-defined or poorly-enforced property rights, externalities, and public goods; evaluate the rationale and effectiveness of government attempts to remedy these problems.

High School Economics Benchmark 9.2.4.8.3: Identify measures of income distribution, wealth distribution and poverty and explain how these affect, and are affected by, the economy; evaluate the effectiveness of, and incentives created by, government income redistribution programs.

2. One commenter suggested that the comparative advantage concept addressed in benchmark 8.2.5.12.1 is a concept that is too difficult for students in grade 8.

Response: Benchmarks are not a part of this rulemaking proceeding, however several concerns related to Geography were raised about supporting benchmarks so the department will briefly respond to this concern. The department respectfully disagrees with this commenter. Comparative advantage is not too complex a topic for middle school students, and mastery of this concept is in fact a necessity given our increasingly global economy. Examples provided to support benchmark 8.2.5.12.1 are based on a simulation that has been conducted by multiple committee members with students to teach the concept of comparative advantage.

Discussion about why one region produces some goods and a second region produces others is both necessary and appropriate for students if they are to understand the geographic concept of what defines something a region. Benchmark 8.2.5.12.1 is listed below for reference:

Grade 8 Geography Benchmark 8.2.5.12.1: Explain why trade is mutually beneficial to countries; define and apply absolute and comparative advantage with respect to international trade. *For example:* Absolute advantage—using fewer resources to produce a good (based on differences in productivity). Comparative advantage—giving up fewer other goods to produce a good (based on differences in opportunity costs). A worker in Country A can produce two rugs or four pizzas in one day, while a worker in Country B can only produce one rug or one half of a pizza. Country A has an absolute advantage in producing both rugs and pizzas (workers can produce more of both). However, Country B has a comparative advantage in producing rugs (one rug costs one half of a pizza in Country B, while in Country A one rug costs two pizzas). Both countries would be better off if Country A specialized in producing pizzas and Country B specialized in producing rugs and they traded at a rate of one rug for one pizza.

3. Some commenters expressed concern related to the inclusion of the topic of free-market capitalism in the proposed economics standards.

Response: The standards describe the function of a market system, otherwise known as “market capitalism.” Calling it “free market” capitalism is redundant, because an important component of capitalism is competitive (or “free”) markets.

Purely free markets do not exist except in theory. Governments intervene in markets in a variety of ways. In addition, corporations either purposely or accidentally establish barriers to entry which inhibits the “free market.” The United States has a mixed economy, as does most of the world.

In the 21st century every country around the world, with very few exceptions, contains some elements of market capitalism. There are very few countries in the modern world (if any) that could be considered a true command economy. Therefore, the purest forms of both market and command economic systems are historical concepts rather than a modern economic reality.

Lastly, as mentioned previously in this Response, the standards are presented in a balanced way so as not to promote any particular ideology, belief system, or set of values.

4. Some commenters expressed concern related to the lack of reference to the Kuznet Curve, micro technology initiatives, and the connections between energy consumption and poverty eradication in the proposed economics standards.

Response: This topic is not covered in the proposed 2011 standards, but districts may choose to incorporate it into local curriculum. The standards are broad statements of skill and understanding that students must master. Topics recommended by the commenter are too specific to be included in the broad anchor standards, which are meant to capture the 10-12 most essential concepts or skills in a social studies discipline. Feedback from the public was carefully reviewed at several points throughout the review process, and these topics were never raised during that official review process. The

topics suggested by this commenter might be deemed appropriate for the benchmark level, or to be included in examples. However, benchmarks and examples are not part of the rulemaking proceeding so this suggestion is outside the scope of the rulemaking process.

VI. Comments Received in Support of the Proposed Standards

The department received many comments in support of the proposed standards. The department thanks those individuals and entities who took the time to support the standards development and the rulemaking process.

VII. Conclusion

This document constitutes the department's preliminary response to comments and concerns received during the hearing request time period and post-hearing comment period for the proposed social studies academic standards rules. In conclusion the department believes that the proposed social studies standards are necessary, reasonable, and in accordance with the law. We respectfully request that these proposed rules be approved.

If you have questions about this agency response please contact Kerstin Forsythe Hahn, the department's rulemaking coordinator at 651-582-8583 or Kerstin.forsythe@state.mn.us.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jessie Montano".

Jessie Montano
Deputy Commissioner
Minnesota Department of Education

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