

1 EDUCATION AND WORKFORCE DEVELOPMENT CABINET

2 Kentucky Board of Education

3 Kentucky Department of Education

4 (Amended after Comments)

5 704 KAR 8:060. Required Academic Standards for Social Studies.

6 RELATES TO: KRS 156.070, 156.160, 158.6451, 158.6453, 160.290

7 STATUTORY AUTHORITY: 156.070, 156.160, 158.6453(2)

8 NECESSITY, FUNCTION, AND CONFORMITY: KRS 156.070 requires the Kentucky Board
9 of Education to establish courses of study for the different grades and kinds of common schools,
10 with the courses of study to comply with the expected goals, outcomes and assessment strategies
11 developed under KRS 158.645, 158.6451, and 158.6453. KRS 156.070(1) requires the Kentucky
12 Board of Education to manage and control the common schools and all programs operated in the
13 schools. KRS 160.290 authorizes local boards of education to provide for courses and other
14 services for students consistent with the administrative regulations of the Kentucky Board of
15 Education. KRS 158.6453(2) requires the Kentucky Department of Education to implement a
16 comprehensive process for the review of academic standards and assessment with the advice of a
17 standards and assessments review and development committee. This administrative regulation
18 incorporates by reference the Kentucky Academic Standards for Social Studies, which contain
19 the general courses of study and academic content standards of social studies, for use in
20 Kentucky's common schools.

1 Section 1. Before graduating from a Kentucky public high school, a student shall meet the
2 minimum content requirements established in the Kentucky Academic Standards for
3 Social Studies.

4 Section 2. Incorporation by Reference. (1) The "Kentucky Academic Standards for **[Reading**
5 **and]** Social Studies", **April** ~~February~~ 2019, is incorporated by reference.

6 (2) This material may be inspected, copied, or obtained, subject to applicable copyright law, at
7 the Department of Education, 5th floor, 300 Sower Boulevard, Frankfort, Kentucky 40601,
8 Monday through Friday, 8:00 a.m. to 4:30 p.m.

This is to certify that the chief state school officer has reviewed and recommended this administrative regulation prior to its adoption by the Kentucky Board of Education, as required by KRS 156.070(5).

(Date)

Wayne D. Lewis
Commissioner of Education

(Date)

Hal Heiner, Chairperson
Kentucky Board of Education

REGULATORY IMPACT ANALYSIS AND TIERING STATEMENT

Regulation Number: 704 KAR 8:060
Contact Person: Deanna Durrett, Deanna.Durrett@education.ky.gov
Phone Number: 502-564-4474

(1) Provide a brief summary of:

(a) What this administrative regulation does: This regulation fulfills the requirements of KRS 158.6453 and sets forth the minimum content requirements to be met by a student per the Kentucky Academic Standards for Social Studies.

(b) The necessity of this administrative regulation: KRS 158.6453 required the Kentucky Department of Education (KDE) to implement a comprehensive process for the review of academic standards and assessment. This regulation fulfills the requirements of KRS 158.6453.

(c) How this administrative regulation conforms to the content of the authorizing statutes: This regulation conforms to KRS 158.6453 as it implements a process for the review Kentucky's academic standards and the alignment of corresponding assessments with the advice of a review and development committee assigned to focus on social studies.

(d) How this administrative regulation currently assists or will assist in the effective administration of the statutes: This regulation conforms to KRS 158.6453 and will assist in its administration as it implements a process for the review of Kentucky's academic standards and the alignment of corresponding assessments with the advice of a review and development committee assigned to focus on social studies.

(2) If this is an amendment to an existing administrative regulation, provide a brief summary of:

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|--|-----|
| (a) How the amendment will change this existing administrative regulation: | N/A |
| (b) The necessity of the amendment to this administrative regulation: | N/A |
| (c) How the amendment conforms to the content of the authorizing statutes: | N/A |
| (d) How the amendment will assist in the effective administration of the statutes: | N/A |

(3) List the type and number of individuals, businesses, organizations, or state and local governments affected by this administrative regulation: Those affected by this regulation include: all public schools, school districts, school councils and the Kentucky Department of Education as it will provide support related to this administrative regulation.

(4) Provide an analysis of how the entities identified in question (3) will be impacted by either the implementation of this administrative regulation, if new, or by the change, if it is an amendment, including:

(a) List the actions that each of the regulated entities identified in question (3) will have to take to comply with this administrative regulation or amendment: The standards outlined in 704 KAR 8:060 are the revised standards for social studies. As this regulation also includes the minimum content requirements for graduation related to social studies, all public schools, school districts and school-based decision making councils are required to follow the standards outlined in the

document incorporated by reference in 704 KAR 8:060. Curriculum and content decisions are made at the local level and will be expected to follow these outlined standards.

(b) In complying with this administrative regulation or amendment, how much will it cost each of the entities identified in question (3): Schools and Districts: A 2008 study published by LRC called *The Costs of College and High School Textbooks in Kentucky* indicated an *average* text cost of \$50 per textbook. While textbooks contain teacher materials, this cost does not account for additional expenses related to teacher training and/or local efforts to align curricula. An estimated cost per class for instructional materials: \$50 x 100 students per grade level. There also will be costs associated for local curricula development and teacher professional learning to support implementation of new curricula. Estimated teacher time for curriculum development/alignment (in a school with only 1 teacher per grade): \$4,000 (5 days for alignment work x 4 teachers x \$200/day). Estimated costs related to professional learning: \$25,000 x # grades = \$X per year.

Kentucky Department of Education: In the revisionary process of social studies standards required by statute, the Department spent \$72129.36 as of the date of filing in the development of the standards in addition to staff time. Additional staff time will be needed as the regulation moves through the legislative and implementation processes.

(c) As a result of compliance, what benefits will accrue to the entities identified in question (3): The compliance of public schools, school districts and school councils will ensure that each student will be qualified for graduation as they will have met the minimum content requirements for social studies. Graduation rates are used as part of each school's accountability model and are reported on each school's report card.

(5) Provide an estimate of how much it will cost the administrative body to implement this administrative regulation:

(a) Initially: The Department spent \$72129.36 administrative costs for the development of the social studies standards that are incorporated by reference in 704 KAR 8:060 to be compliant with KRS 158.6453, as well as staff time to oversee its administration.

(b) On a continuing basis: Additional staff time will be needed as the regulation moves through the legislative and implementation process.

(6) What is the source of the funding to be used for the implementation and enforcement of this administrative regulation: State funds have been used to develop these standards.

(7) Provide an assessment of whether an increase in fees or funding will be necessary to implement this administrative regulation, if new, or by the change if it is an amendment: Some of the state funds cut from the 2018-20 budget were used in the past by the Kentucky Department of Education to implement new standards using the research-based model of leadership networks and provide support to districts as they implement new standards. However, without those funds, much of the implementation support provided in the past will not be available.

(8) State whether or not this administrative regulation established any fees or directly or indirectly increased any fees: 704 KAR 8:060 does not establish any fee directly nor indirectly increased any fees.

(9) TIERING: Is tiering applied? (Explain why or why not) Tiering was not appropriate in this administrative regulation because the administrative regulation applies equally to all schools and local education agencies.

FISCAL NOTE ON STATE OR LOCAL GOVERNMENT

Regulation Number: 704 KAR 8:060
Contact Person: Deanna Durrett, Deanna.Durrett@education.ky.gov
Phone Number: 502-564-4474

(1) What units, parts or divisions of state or local government (including cities, counties, fire departments, or school districts) will be impacted by this administrative regulation? Local education agencies and the Kentucky Department of Education.

(2) Identify each state or federal statute or federal regulation that requires or authorizes the action taken by the administrative regulation. KRS 158.6453 required the Kentucky Department of Education (KDE) to implement a comprehensive process for the review of academic standards and assessment. This regulation fulfills the requirements of KRS 158.6453.

(3) Estimate the effect of this administrative regulation on the expenditures and revenues of a state or local government agency (including cities, counties, fire departments, or school districts) for the first full year the administrative regulation is to be in effect.

(a) How much revenue will this administrative regulation generate for the state or local government (including cities, counties, fire departments, or school districts) for the first year? No revenue.

(b) How much revenue will this administrative regulation generate for the state or local government (including cities, counties, fire departments, or school districts) for subsequent years? No revenue.

(c) How much will it cost to administer this program for the first year? Schools and Districts: A 2008 study published by LRC called *The Costs of College and High School Textbooks in Kentucky* indicated an *average* text cost of \$50 per textbook. While textbooks contain teacher materials, this cost does not account for additional expenses related to teacher training and/or local efforts to align curricula. An estimated cost per class for instructional materials: \$50 x 100 students per grade level. There also will be costs associated for local curricula development and teacher professional learning to support implementation of new curricula. Estimated teacher time for curriculum development/alignment (in a school with only 1 teacher per grade): \$4,000 (5 days for alignment work x 4 teachers x \$200/day). Estimated costs related to professional learning: \$25,000 x # grades = \$X per year. Typically, school districts would have used professional development funds to provide professional development for teachers to review and revise curriculum to incorporate new standards. However, HB 200 (2018) eliminated those funds; therefore, other district funds will need to be used to implement new standards.

Kentucky Department of Education: In the revisionary process of social studies standards required by statute, the Department spent \$72129.36 as of date of filing in the development of the standards in addition to staff time. Additional staff time will be needed as the regulation moves through the legislative and implementation processes. The Kentucky Department of Education used state funds to conduct the revision and implementation process. Additional staff time will be impacted through implementation.

(d) How much will it cost to administer this program for subsequent years? Once curriculum documents are revised, implementation cost will decrease.

Note: If specific dollar estimates cannot be determined, provide a brief narrative to explain the fiscal impact of the administrative regulation.

Revenues (+/-): N/A

Expenditures (+/-):

Other Explanation:

Summary Page - Incorporation by Reference

704 KAR 8:060, Required Academic Standards for Social Studies

The following documents are incorporated by reference:

(1) “Kentucky Academic Standards for Social Studies”, April 2019. The document incorporated by reference consists of 229 pages. The document incorporated by reference contains the required standards for social studies.

STATEMENT OF CONSIDERATION
Relating to 704 KAR 8:060
Kentucky Academic Standards for Social Studies

Kentucky Board of Education
Department of Education

(Amended After Comments)

- I. A public hearing was held on the above regulation on March 27, 2019, at 10:00 a.m. Eastern Time at 300 Sower Boulevard, Frankfort, Kentucky.
- II. The following individuals attended this public hearing or submitted written or verbal comments:

<u>Name</u>	<u>Title and Affiliation</u>
Burnett, Deborah	Unspecified
Carter, Mary	Retired Educator
Crowley, Ryan	Assistant Professor, University of Kentucky, College of Education, Department of Curriculum and Instruction
Dafour, Joel	Unspecified
Davis, Ray	Unspecified
Innes, Richard	Staff Education Analyst, Bluegrass Institute for Public Policy Solutions
Gaskin, Frank	Unspecified
Getman, Sue	Unspecified
Greer, Randall	Unspecified
Gulla, Megan	Director of Engagement, CivicLex
Hall, Jane	Former Educator
Kenney, Candy	Unspecified
Lewis, Ryan	Educator, Woodford County Schools
Muetterties, Carly	Educator, PhD Candidate in Curriculum and Instruction
New, Lisa	Unspecified
New, Ryan	Social Studies Instructional Lead, Jefferson County Schools
Pierce, Kenneth	Former Educator
Popplewell, Ryan	Educator, Fayette County Schools
Presnell, Kevin	Educator, Vice-President of the Kentucky Reading Association
Price, Sally	Unspecified
Richard, Stacie	Parent

Rosenberger, Greg	Unspecified
Rosenberger, Libby	Retired Educator
Sabie, Tarik	Unspecified
Schimmoller, Chris	Unspecified
White, Deborah	Unspecified
Wilkerson, Donnie	Educator, Russell County Schools

III. The following staff from the promulgating administrative body responded to written comments:

Name and Title

Rhonda Sims, Associate Commissioner, Office of Standards, Assessment and Accountability
Michael Hackworth, Policy Advisor, Office of Standards, Assessment and Accountability
Robin Chandler, Policy Advisor, Office of Standards, Assessment and Accountability
Jennifer Fraker, Policy Advisor, Office of Standards, Assessment and Accountability
Todd Allen, Deputy General Counsel, Office of Legal Services
Lauren Gallicchio, Social Studies Consultant, Division of Program Standards
Thomas Clouse, Program Manager, Division of Program Standards

IV. Summary of Comments and Responses

(1) Subject Matter: Support for the adoption of the *Kentucky Academic Standards (KAS) for Social Studies*

(a) Comments: The comments in this section relate to support for the adoption of the *KAS for Social Studies*.

One commenter stated the importance of the social studies program and suggested for the new social studies document to become real by being adopted into law.

Another commenter stated the importance of making sure that all Kentucky schools are teaching students "social studies," including specifically history, geography and civics. The commenter continued to state that social studies education is important for a "well rounded education."

A commenter supported the *KAS for Social Studies* and the way the standards balance content knowledge with disciplinary skills. The commenter believes the inquiry process provides opportunities for students to use a variety of sources in order to answer supporting and compelling questions. The commenter also praised the way the document covers multiple cultures and diverse groups, and how that allows for educators to teach about the "changing nature of the U.S." and how diverse groups contribute to that "identity."

One commenter supported the adoption of the social studies standards because they are grounded in research and are created by Kentucky educators. The commenter also supported the inclusion of a K-12 study of Kentucky. The individual stated the document is important because it emphasizes Kentucky's place in "our" shared history and that it illuminates the role Kentucky has played, and its "citizens have played" in "leading progress ahead." Lastly, the commenter stated

that adopting the standards will "promote teaching that fosters knowledgeable, well-rounded civically-engaged Kentuckians."

Another commenter supported the *KAS for Social Studies*, stating that social studies need standards. The commenter also supported the rigor associated with the proposed standards document. The individual stated that these standards address what students should learn and gives a way for students to learn. The commenter also appreciated the "clearly defined" specific standards for geography, history, economics and world history. Lastly, the commenter stated these standards are "student centered" and they emphasize "student learning."

An additional commenter advocated for the adoption of the *KAS for Social Studies*. The commenter stated that the standards are "student-centered" and encourage skill development alongside content acquisition. The commenter stated that the standards will push Kentucky to the "forefront" of social studies education. Moreover, the commenter supported the standards because they teach students to "pose questions, to analyze sources in a critical fashion, and to make argumentation claims based on evidence they have gathered." The commenter suggested these skills will have a positive impact on students as they move to levels of higher education and/or enter the workforce. Lastly, the commenter stated that the standards will make for a "more informed and more skeptical citizenry."

Another commenter suggested the adoption of the social studies standards should occur. The commenter refuted the criticism that more names should be included in the document as those are not needed in the "information age." The commenter added that what is needed is discussion, investigation with questions, exploration of resources, and the communication of conclusions "after having first built the knowledge and skills to do so." The commenter included a plan for what instruction could look like in a first grade classroom using the social studies standards document.

Three commenters stated that the standards have a "pedagogical approach" that is grounded in research, are student led and well written by Kentucky educators. One commenter supported the standards, calling them a "high quality framework for learning." The commenter also supported the standards for their "comprehensive and intentionally broad" standards that they say "empower the teacher" and "foster multiple perspectives."

Individuals speaking or offering written comments of concerns on this subject matter include: Deborah Burnett, Ryan Crowley, Megan Gulla, Ryan Lewis, Ryan New, Carly Muetterties, Kenneth Pierce, Ryan Popplewell and Kevin Presnell.

(b) Response: The agency carefully considered the comments.

The agency acknowledges the comments made in support of the *KAS for Social Studies*. No changes will be made in response to comments in support of adoption.

(2) Subject Matter: More Time Needed for the Revision

(a) Comments: The comments in this section relate to the standards revision process dictated by

Senate Bill (SB) 1 (2017).

Commenters asked the agency to reconsider the adoption of the proposed *Kentucky Academic Standards (KAS) for Social Studies*.

One commenter stated that more standards would be helpful to teachers and students and wants the process to be re-assessed to include more information.

Another commenter recognized that the development of solid education standards is difficult, and because the standards are the foundation for assessment and curriculum, the revised standards need additional time for further attention and development. An additional commenter encouraged the agency to “double study” the adoption of the proposed *KAS for Social Studies*.

Another commenter stated that the standards revision process was “poor.”

A commenter also stated that the draft standards were not easily accessible to all stakeholders.

Individuals speaking or offering written comments or concerns on this subject matter include: Richard Innes, Candy Kenney, Kenneth Pierce, Deborah White and Donnie Wilkerson.

(b) Response: The agency carefully considered all comments that were received.

In 2017, the Kentucky General Assembly passed SB 1. SB 1 (2017) calls for the Kentucky Department of Education (KDE) to implement a process for reviewing all academic standards and aligned assessments beginning in the 2017-18 school year. The proposed schedule calls for one or two content areas to be reviewed each year and every six years thereafter on a rotating basis. Since schools are required to use the *Kentucky Academic Standards (KAS)* as the basis of their curricula and instruction, the *Kentucky Academic Standards for Social Studies (2006)* is the standards document that SB 1 mandates as the subject of the revision process. While new social studies standards were drafted in 2015, feedback conducted by the KDE found that further revision was needed, and the 2015 draft standards were not adopted by the Kentucky Board of Education (KBE). Since the KBE did not adopt the 2015 draft standards, they were not the standards used for instruction.

The KDE began the review and revision process for current *KAS for Social Studies* in January 2018. SB 1 (2017) required that revision to the content standards shall:

- Focus on critical knowledge, skills, and capacities needed for success in the global economy;
- Result in fewer but more in-depth standards to facilitate mastery learning;
- Communicate expectations more clearly and concisely to teachers, parents, students, and citizens;
- Be based on evidence-based research;
- Consider international benchmarks; and
- Ensure that the standards are aligned from elementary to high school to postsecondary education so that students can be successful at each education level.

SB 1 (2017) required that the department establish a Standards and Assessment Review and Development Committee (RDC) for social studies. The RDC reviewed findings and made recommendations to revise or replace existing standards and adjust assessments to ensure alignment with the standards. The RDC consisted of elementary, middle and high school teachers, members from postsecondary education and representatives from the Kentucky business community.

SB 1 (2017) also established that three Advisory Panels (APs) shall be assigned to each RDC. One panel shall review the standards and assessments kindergarten through grade 5, one shall review standards and assessments for grades 6 through 8, and one shall review the standards and assessments for grades 9 through 12. The combined AP reviewed the standards and made recommendations for changes to the RDC. The AP consisted of elementary, middle and high school teachers, members from postsecondary education and representatives from the Kentucky business community.

During the design considerations discussion of the proposed 2018 *KAS for Social Studies*, the writers used feedback provided on the 2015 standards, as directed by the Commissioner, to inform the development and vision of the 2018 standards. When discussing the 2015 draft *Social Studies Standards for the Next Generation* (not adopted), the teacher writers determined, based on feedback received on the 2015 standards and their own personal knowledge, that the 2015 standards were flawed for the following reasons:

(1) There was no content, scope or sequence in the 2015 draft standards. The teachers knew that revised standards needed to have content and needed to provide a scope and sequence in order for schools to successfully implement the standards.

(2) The inquiry standards found within the 2015 document were the same for all grades, kindergarten through grade 12. This made it very difficult for teachers to understand how to implement the standards as they weren't sure how a particular inquiry standard would differ between grade levels.

Consequently, the 2018 teacher writers from across Kentucky created a document with grade level inquiry standards, grade level content standards and a scope and sequence for kindergarten through twelfth grade to ensure that students would have an opportunity to become lifelong critical thinkers who ask questions and can undertake multidimensional, complex reasoning.

As required by SB1 (2017) and Executive Order 18-581, the Standards and Assessments Process Review Committee reviewed the standards revision process to ensure that shareholders had adequate opportunity for input. The Standards and Assessments Process Review Committee consisted of the Commissioner of Education, or his designee, as a non-voting member and three voting members who were selected by the KBE. The Committee found that the process was found sufficient, and the recommendations (without amendment) went to the KBE for consideration.

As required by SB 1 (2017), throughout the process, numerous opportunities were provided to solicit public input.

The proposed *KAS for Social Studies* was available for review and feedback during public comment periods in February 2018, August 2018 and March 2019. In August, for example, 1,227 survey respondents from the public and social studies community (roughly 77.59 percent were teachers) accounted for a total of 5,306 comments.

Additionally, prior to the first reading of the *KAS for Social Studies*, which included 704 KAR 8:060 and the document incorporated by reference, at the December KBE meeting, the draft standards were posted on the Kentucky School Boards Association (KSBA) public portal. The draft standards were included as a downloadable document within the KBE meeting agenda. They also were available on the KSBA portal before the February KBE meeting in which they were approved after the second reading. Currently, the draft standards are available on the public portal and can be accessed at any time by any interested party.

During public comment at the December 2018 KBE meeting, three individuals spoke about the standards. One of these individuals represented the Kentucky Council for the Social Studies (KCSS) and expressed the organization's support for the standards and how they foster the development of an informed, engaged and active citizenry. The KCSS endorsed the *KAS for Social Studies* on their organization's website. Another educator spoke as both a parent and social studies educator in support of the draft standards because they help prepare children for the critical thinking necessary to make the decisions needed in the future. Another commenter expressed concerns about the lack of diversity represented in the standards and provided examples to support the argument.

Focus groups conducted in December included representatives from Kentucky education organizations and stakeholders. Representatives from the following organizations participated: the Kentucky Governor's Office of Early Childhood (GOEC), Kentucky World Language Association (KWLA), Center for Economic Education at Murray State University, Green River Regional Educational Cooperative (GRREC), Central Kentucky Educational Cooperative (CKEC), McConnell Center for Civic Education and Engagement, Kentucky Association for Environmental Education (KAEE), Prichard Committee and Kentucky Music Educators Association (KMEA). The December focus groups informed revisions by the AP and RDC to provide more clarity throughout the standards document, especially in grades K-8. The focus groups liked the Grade Specific Overview draft for kindergarten, and as a result of feedback from the focus groups and the KBE, Grade Specific overviews and disciplinary clarifications were added for K-8, and standards were revised to address clarity and inclusion.

Additionally, the Local Superintendents Advisory Council (LSAC) reviewed 704 KAR 8:060, *KAS for Social Studies*, at its November 27, 2018, and January 29, 2019, meetings. The LSAC did not recommend any changes. The KBE approved 704 KAR 8:060, *KAS for Social Studies* at its February 2019 meeting.

The agency followed the intensive standards revision process mandated in SB 1 (2017), and as a result, the agency declines to delay action on this matter.

(3) Subject Matter: Assessment of the Social Studies Standards

(a) Comments: The comments in this section relate to the assessment of the proposed *KAS for Social Studies*.

One commenter expressed that the revised standards are “incomplete” due to the lack of additional content and, therefore, cannot be assessed on state assessments. More specifically, the commenter stated that if the content is not mentioned in the standards it cannot be included on state assessments. The commenter relayed that “testing material which has not received fair notices is a violation of the law.” The commenter stated that a 1995 report issued by the Legislative Research Commission provides information about appropriate notice for assessment. The commenter believes that testing material not listed in the standards violates the law. Moreover, the commenter questioned how student mastery of the standards will be measured by assessments.

Another commenter mentioned the concern that subject areas, such as social studies or science, are only taught in years in which they are assessed by the state.

One commenter stated that the assessment plan for social studies standards will be modeled after the science assessment and expressed concern because science performance is lower than in the previous assessment systems. The commenter argued that low science performance must mean a problem with the standards or the assessment. The commenter also questioned the funding source for the social studies assessment.

Individuals speaking or offering written comments of concerns on this subject matter include: Richard Innes, Stacie Richard and Donnie Wilkerson.

(b) Response: The agency carefully considered the comments.

It is important to point out the assessment of these standards is outside the purview of this regulation.

However, KRS 158.6453 requires that the KBE create and implement a balanced statewide assessment program that measures the achievement of students, schools and districts; complies with the federal Every Student Succeeds Act of 2015, 20 U.S.C. secs. 6301 et seq., or its successor; and ensures accountability. The assessments, as required by KRS 158.6453, must be developed by Kentucky teachers and aligned to the *Kentucky Academic Standards*. The KDE follows a process for reviewing Kentucky’s academic standards and the alignment of corresponding assessments for possible revision or replacement to ensure alignment with postsecondary readiness standards necessary for global competitiveness and with state career and technical education standards. Kentucky assessments cover the standard level and performance is reported out at the strand level (i.e., civics, economics, geography, history), and not every discreet topic needs to be listed in the standards in order to be assessed on the state assessment. Consider the following example related to mathematics: if the commenter’s reasoning was

applied to mathematics, each potential mathematics problem would need to be listed in the standards in order to be on the state assessment. Or for a reading assessment, no reading passage could be used unless it was listed in the standards. In addition, as part of the requirements of KRS 158.6453, educators throughout the state will have the opportunity to review assessment blueprints and make recommendations. Assessment blueprints have dual purposes as they provide (1) targets for test development related to the relative emphasis to be placed on the strands assessed and (2) information to teachers as they make instructional decisions.

The agency has carefully considered the comment regarding “fair notice” relating to assessment. SB 1 (2017) was clear, *i.e.* that the KDE would not do statewide assessments based on criteria that was not approved by the board, and until the new standards are approved, the KDE must use the old criteria. Subsection 2 states that, “Any revision to, or replacement of, the academic standards and assessments as a result of the review process conducted under this subsection shall be implemented in Kentucky public schools no later than the second academic year following the review process. Existing academic standards shall be used until new standards are implemented.” Subsection 3(c) states, “The statewide assessments shall not include any academic standards not approved by the board under subsection (2) of this section.” In February 2019, the KBE approved 704 KAR 8:060, *Kentucky Academic Standards for Social Studies* and therefore, the requirements of SB 1 (2017) related to standards and assessment of those standards have been met. Kentucky’s assessments must measure the state’s adopted standards. The social studies assessment design has not been established for the new standards. The current science test measures Kentucky’s adopted science standards. In addition, standards will be revised on the schedule as prescribed in SB 1 (2017). The agency appreciates all comments received, but assessment is not under purview of this regulation.

The *Kentucky Academic Standards* (KAS) ensure that all districts and schools have access to the same outline of expectations and those expectations establish the minimum foundation for learning for students across the state. The revised *KAS for Social Studies* outlines the minimum content requirements for Kentucky students at each grade level or grade band. While the agency is responsible for the development of academic standards, state law assigns each local school-based decision making (SBDM) council the authority to design the school’s curriculum and determine appropriate instructional materials and activities based upon language found in KRS 160.345. Therefore, SBDMs have the flexibility to design curriculum fulfilling the requirements of the *Kentucky Academic Standards*. The SBDM also may incorporate additional subject matter into personalized courses in a manner that best meets the needs of their students. Schools and districts throughout the state are responsible for coordinating curricula across grade levels and among schools within districts. A coordinated curricular approach ensures that all students have opportunities to experience success with Kentucky’s learning goals and expectations. Schools and districts can also design both formative and summative assessments across grade levels so that all students can demonstrate mastery of content.

Kentucky’s assessment program implements state and federal legal requirements within its budgeted funds.

After careful review, the agency declines to amend the regulation.

(4) Subject Matter: Teaching of Items Not Mentioned in Document

(a) Comments: The comments in this section relate to whether or not terms, people, events, etc., will be taught if not explicitly mentioned in the social studies standards document.

A commenter expressed the concern that if items were not explicitly mentioned in the standards document then they would not be taught to students.

Another commenter believes the new standards represent the "bare minimum" of what needs to be taught. The commenter believes this is all that will be taught in social studies.

Individuals speaking or offering written comments of concerns on this subject matter include: Ray Davis, Stacie Richard and Donnie Wilkerson.

(b) Response: The agency carefully considered the comments.

The revised *KAS for Social Studies* outlines the minimum content requirements for Kentucky students at each grade level or grade band. Standards represent a floor, not a ceiling. Additionally, the standards address what is to be learned - what students must know and do - but do not address how learning experiences are to be designed, what resources should be used, or what specific curricular content should be taught.

While the KDE is responsible for the development of standards, state law assigns each local SBDM council the authority to design the school's curriculum and determine appropriate instructional materials based on language found in KRS 160.345. KRS 160.345 states the following:

The school council shall determine which textbooks, instructional materials, and student support services shall be provided in the school. Subject to available resources, the local board shall allocate an appropriation to each school that is adequate to meet the school's needs related to instructional materials and school-based student support services, as determined by the school council. The school council shall consult with the school media librarian on the maintenance of the school library media center, including the purchase of instructional materials, information technology, and equipment;...

The school council shall adopt a policy to be implemented by the principal in the following additional areas: 1. Determination of curriculum, including needs assessment, curriculum development and responsibilities under KRS 158.6453(19);...

Therefore, the standards purposefully establish learning outcomes and leave curricular decisions to those who are best suited to make those choices, local schools. By carefully constructing progressions that balance the acquisition of skills and content, the standards allow students to develop a seamless understanding of the crucial concepts of the social studies disciplines.

After careful review, the agency declines to amend the regulation.

(5) Subject Matter: Writers Knowledge of School-Based Decision Making Statutes

(a) Comments: The comments in this section relate to how the writers understood statutes regarding school councils.

One commenter believes there is a legal problem in the description for KRS 158.6450. In particular, the commenter believes that the language could “lead schools to commit a statutory violation of Kentucky’s SBDM laws” because the law states the following: “A school may provide this information (instruction in voter registration and election procedures) through classroom activities, written materials, electronic communication, Internet resources, participation in mock elections and other methods identified by the principal after consulting with teachers.”

Additionally, this commenter believes that the writers of the revised *KAS for Social Studies* did not understand the requirements of Kentucky’s SBDM statutes. The commenter states that “the ultimate responsibility to create supporting curriculum for those standards is placed way down at the school level.” The commenter believes the statement “local schools and districts choose to meet those minimum required standards using a locally adopted curriculum” is misleading because it “indicates that districts play a major role in curriculum creation.”

Furthermore, this commenter believes the revised *KAS for Social Studies* does not provide enough information on the role of SBDMs in the implementation of the standards.

This commenter also stated that while the citation for KRS 158.075 is accurate, it does not mention that “under KRS 160.345 the school council is probably required to advise the principal because this is implementation of standards, as well.”

Individuals speaking or offering written comments of concerns on this subject matter include: Richard Innes.

(b) Response: The agency carefully considered the comments.

In regards to the concerns raised about the description for KRS 158.6450 in the document, the agency declines to amend the document as the included language is a direct quote from the statute.

However, based on feedback provided, the section entitled *Translating the Standards into Curriculum* will be modified to provide greater clarity on the role of the SBDM in implementing the proposed *KAS for Social Studies*. The original text in the document stated “local schools and districts choose to meet those minimum required standards using a locally adopted curriculum.” The agency concurs with the commenter that this statement may need additional clarity; therefore, the agency will add “local schools and districts choose to meet those minimum required standards using a locally adopted curriculum according to KRS 158.6453, which outlines the SBDM’s role in determining curriculum.”

After careful consideration, the agency agreed to amend the regulation.

(6) Subject Matter: Standards versus Curriculum

(a) Comments: The comments in this section relate to specific people, events and terms being named in the standards document.

Six commenters stated that the standards are general, vague and depersonalized.

Three comments were specific to the lack of “historical personages” in the *KAS for Social Studies*.

One commenter stated many individuals who contributed to the story of American exceptionalism and industrial development are absent from the standards. The commenter argued the *KAS for Social Studies* “only mentions [historical personages] in a cursory listing.” The commenter stated that without cohesive, minimal references to essential and undisputed historical figures the standards will not provide students with common, minimum core knowledge.

The commenter also was concerned that there is additional content missing from the standards. The commenter cited the omission of Berea College from the standards. Additionally, the commenter expressed concern with the omission of geography terms, including, “Equator,” “Greenwich (or Prime) Meridian,” “Topographic Map,” “Mercator projection,” “North Pole” and “South Pole” as well as physical geographic terms relating to the area, such as “Kentucky Bend” and “Notch”. The commenter expanded on concerns about geography by discussing that Geographic Information Systems (GIS) “is never mentioned in the Kentucky draft” but that the “NatGeo standards require GIS to be introduced by Grade 8 and effectively used by Grade 12 students.” Additionally, the commenter stated that additional terms are missing and include “Pacific Ocean,” “Atlantic Ocean,” “Antarctic,” and “Arctic.” The commenter further stated the “Key Vocabulary” listings for each grade are too short and incomplete.

Additionally, a few commenters mentioned specific events and how they should be stated explicitly in the standards document. Commenters included the following events: the War of 1812, Chinese Wars, Pequot, King Phillip's Wars, Israeli War for Independence, Vietnam War, Korean War and Persian Gulf War. Commenters also mentioned ongoing military conflicts in Iraq and Afghanistan.

One commenter also suggested the addition of the terms “calendar” and “religious diversity” and the legislation known as the “New Deal.”

A few commenters identified specific persons as being important, specifically stating the need to study Abraham Lincoln and Martin Luther King, Jr. One commenter also mentioned the omission of FDR, Madison and John Adams. Another commenter argued that without specific names the social studies document erases 228 years of history. This commenter asked that the department consider that many of the arguments against the proposed *KAS for Social Studies* focus on deletions from current *Kentucky Academic Standards*. When discussing the twentieth

century, the commenter stated that “Madeline McDowell Breckinridge and women’s suffrage, the horrors of child Labor, World War I, the Great Depression, the Dust Bowl, the Holocaust, World War II, the Cold War, the Civil Rights Movement, Martin Luther King, Jr., his ‘I Have a Dream’ Speech, and Neil Armstrong’s ‘One Small Step’ are just some of the many things...currently stud[ied] in fifth grade” but will not be studied in fifth grade with the proposed *KAS for Social Studies*. Additionally, this commenter discussed items he teaches during fifth grade. The commenter stated that “the entire two centuries during which they occurred [the events he teaches] are summarily deleted from elementary school history standards and cannot simply be inferred as some may now claim.”

Another commenter suggested a more detailed teaching of social studies in the school system. The individual stated that studying history is particularly important for children to learn, both the good and the bad things that have molded the nation and influenced the state of the nation today. The commenter finished by stating that children need to learn all about past events and individuals who played a part in both recent and not so recent history.

An additional commenter suggested that history and geography were being "watered down." The individual stated that students will not have a "sense" of the people who "made this country what it is" and students will not "learn about the world."

One commenter stated opposition to the changes in the proposed document, which the commenter sees as eliminating important subjects from the course. The commenter mentioned the invention of the light bulb, printing press and atomic bomb.

Individuals speaking or offering written comments of concerns on this subject matter include: Joel Dafour, Ray Davis, Sue Getman, Randall Greer, Jane Hall, Richard Innes, Lisa New, Stacie Richard, Libby Rosenberger, Greg Rosenberger, Tarik Sabie, Chris Schimmoeller and Donnie Wilkerson.

(b) Response: The agency carefully considered the comments.

The revised *KAS for Social Studies* outlines the minimum content required of all Kentucky students at each grade level. Standards are the floor, not the ceiling. Additionally, the standards address what is to be learned - what students must know and do - but do not address how learning experiences are to be designed, what resources should be used, or what specific curricular content should be taught. While the KDE is responsible for the development of standards, state law assigns each local SBDM council the authority to design the school’s curriculum and determine appropriate instructional materials based on language found in KRS 160.345. KRS 160.345 states the following: “The school council shall adopt a policy to be implemented by the principal in the following additional areas: 1. Determination of curriculum, including needs assessment, curriculum development and responsibilities under KRS 158.6453(19);...”.

Therefore, the standards purposefully establish learning outcomes and leave curricular decisions to those who are best suited to make those choices, local schools. By carefully constructing progressions that balance the acquisition of skills and content, the standards allow students to

develop a seamless understanding of the crucial concepts of the social studies disciplines. Furthermore, there is nothing preventing school councils or individual teachers from adding additional content in order to help students meet the objective of the standards.

In developing the architecture of the revised *KAS for Social Studies*, teacher writers from across Kentucky were committed to striking a balance between the content and skills students are required to know and be able to do as both are required to successfully engage in “doing” social studies. They believe educators must impart meaningful content to students and teach them how to think critically about the world and their place in it relative to past events. Neither development of the inquiry practices nor development of the knowledge and understanding within the disciplinary lenses of civics, economics, geography or history is sufficient on its own to equip young people with the knowledge and skills necessary to carry on the ideals of the founders.

The use of “other geographic representations” is consistent with the language used by National Geographic. In fact, the Nat Geo Standards have an entire section on geographic representations, which reference a geographic information system (GIS) as just one example of many types of geographic representations (using an e.g.): “Internet-based mapping applications, GIS, GPS, geovisualization, and remote sensing” (<https://www.nationalgeographic.org/standards/national-geography-standards/1/>). In order to be responsive to quickly changing technology, the term “other geographic representations” was purposefully used (rather than tethering the students of 5-10 years in the future to current technology) in order to open space in the students’ experiences for evolving changes in geospatial technologies, for example, the recent prevalence of OSM (OpenStreetMap).

The current *KAS for Social Studies* (2006) for fifth grade require that students examine significant eras from United States history, such as Colonization and Settlement, Industrialization and Immigration and the Twentieth Century. The proposed *KAS for Social Studies* (2019) for Grade 5 requires that students learn about U.S. History from Colonization to Constitution. The decision to limit the scope of the history standards in Grade 5 was informed by public comment on the current *KAS for Social Studies* (2006) where feedback indicated that the current timeline for fifth grade history was “too expansive” and that “fifth grade should not be required to study events from the beginning to the current time period.” While the theme of Grade 5 in the proposed *KAS for Social Studies* (2019) is Colonization to Constitution, several standards require that students connect their learning from within this theme to the modern world. Furthermore, there is nothing preventing school councils or individual teachers from adding additional content in order to help students meet the objective of the standards.

Additionally, the proposed *KAS for Social Studies* for grades K-5 require that students engage in social studies education throughout their entire elementary school experience. Effective social studies education in the elementary classroom fosters a child’s natural ability to be curious, wonder and reason, which are essential building blocks when making sense of the world. While elementary social studies instruction is intended to spark a desire to better understand the world, it must provide the foundation for students to become knowledgeable citizens and leaders in a diverse and fast-paced world. In kindergarten through grade 5, students use the inquiry practices of questioning, investigating, using evidence and communicating conclusions to understand

themselves, the cultures around them and the founding of the United States through the disciplinary lenses of civics, economics, geography and history. The proposed *KAS for Social Studies* requires that students understand the modern world, both from the present day and the historical perspective. The focus of kindergarten is to provide students with rich explorations of topics that affect them and their personal environment. They engage in learning about themselves, their school, city and local communities. Students also have opportunities to compare how life in the past is different from today, with respect to their own experiences. The focus of grade 1 is the continuation of developing students' citizenship skills by expanding their studies from a personal to a local level, to include the state. They explore the interplay between people of the past and modern communities. Students also engage in thinking and conversing about how their community impacts them. The focus of grade 2 continues to be the development of students' understandings of the concept of community by extending their studies from their local and state community to communities found in North America (Canada, Mexico and the U.S.). They engage in learning the motivations of diverse groups in the past and today. Students also study the influence of settlement on people and places. The focus of grade 3 is the extension of students' understandings of the concept of community to include global communities. Students explore interactions between groups of people in Africa, the Americas, Asia, Europe and Oceania (Australasia, Melanesia, Micronesia and Polynesia). Students also investigate how cultures work together, while acknowledging the different perspectives of diverse groups. The focus of grade 4 builds on students' knowledge of local, national and world social studies to discover how and why people move from one place to another. Through the lens of European Exploration to the Thirteen Colonies, students engage in the study of geographic, political, economic and cultural reasons people move, as well as what they experience during the transition. The focus of grade 5 constitutes a series of explorations about the people, places and ideas that make up the story of the nation, the United States. Students examine the founding of the United States to understand why the founding documents were developed and how they guided decisions in the past. Students also engage in deeper learning about our government and how it is structured. In each of these grades, students are required to understand how the past impacts the present.

When comparing the *KAS for Social Studies* (2006) to the proposed *KAS for Social Studies* (2019), it is important to understand how each document is constructed. In the "*Core Content for Social Studies Assessment*" document, (August 2006), the document states the following:

- The Kentucky Academic Expectations define what students should know and be able to do upon graduation from high school. These large goals were used as a basis for developing the Program of Studies and the Core Content for Assessment. (2)
- The Core Content for Assessment includes state assessed standards and supporting content standards. (4)
- Supporting content standards are proposed for local instruction and assessment and appear in italics in the Core Content document. The content standards for the state assessment are in bold print. (4)

Additionally, the 2006 document states:

- Some Core Content standards contain additional information in parentheses. A list preceded by an e.g., means the examples included are meant to be just that, examples and may be on the state assessment. Other examples not included may also be on the state assessment. However, if the list is not preceded by an e.g., the list is to be considered exhaustive and the items within the parentheses are the only ones that will be assessed.

Thus, in regards to specific items discussed in the comments, such as Martin Luther King's *I Have a Dream Speech*, these items are listed in parentheses with an e.g., meaning that the items listed are suggestions or examples to clarify the standard. These items are not elements of the standard itself.

After careful review, the agency declines to amend the regulation.

(7) Subject Matter: Proposed Social Studies Standards Compared to Other States

(a) Comments: The comments in this section relate to a comparison of the social studies standards to standards from other states.

One commenter explained that other state social studies standards that are highly regarded, such as states that receive a high grade from the Thomas Fordham Institute, do not omit specific people from the standards, but rather give lists, such as Massachusetts and Indiana. This commenter also stated there is content that is in the Massachusetts and Indiana standards that is not found in the proposed *KAS for Social Studies* document, and at times, Massachusetts and Indiana place content in different years of study than in the proposed *KAS for Social Studies*. This commenter further cited a study done by the Woodrow Wilson Institute that concluded that Kentucky ranked second to last in the U.S. when it came to American History knowledge. The commenter used the citation to postulate that the *KAS for Social Studies* would only increase the lack of American historical knowledge amongst Kentucky students.

Another commenter encouraged Kentucky to look at other state models, such as Massachusetts and Indiana.

Individuals speaking or offering written comments of concerns on this subject matter include: Richard Innes and Donnie Wilkerson.

(b) Response: The agency carefully considered the comments.

Design decisions for the proposed *KAS for Social Studies* were informed by reviews of current evidence-based practices, state social studies standards and public comments regarding the 2006 *Kentucky Academic Standards for Social Studies*. The design is intended to convey the importance of both conceptual knowledge and understanding within four disciplinary strands in social studies (civics, geography, economics and history) and the development of the inquiry practices of questioning, investigating, using evidence and communicating conclusions. Grade-level and grade-span concepts within each of the four disciplinary lenses provide the specificity, content and context for the appropriate application of the practices. The complexity of the standards within the concepts and practices progresses from kindergarten through high school.

The KDE provided the following foundational documents to inform the writing team's work:

- Center for Civic Education. (2014). *National Standards for Civics and Government*. Retrieved from <http://www.civiced.org/standards>
- Council for Economic Education. (2010). *Voluntary National Content Standards in Economics*. Retrieved from <https://www.councilforeconed.org/wp-content/uploads/2012/03/voluntary-national-content-standards-2010.pdf>
- Council of Chief State School Officers. (2011). *Global Competence Matrices*. Washington, D.C. Retrieved from <https://teaching.unsw.edu.au/sites/default/files/upload-files/Global%20Competence%20Matrices.pdf>
- Council of Chief State School Officers with the American Historical Association, the American Institutes for Research, the National Council for History Education, and the National Council for the Social Studies. (2014). *U.S. History Framework for the 2014 National Assessment of Educational Progress*. Retrieved from <https://nagb.gov/content/nagb/assets/documents/publications/frameworks/history/2014-history-framework.pdf>
- Council of Chief State School Officers with the National Assessment Governing Board. (2010). *Geography Framework for the 2010 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/geography/2010-geography-framework.pdf>
- Council of Chief State School Officers, Center for Civic Education, the American Institutes for Research for the National Assessment Governing Board. (2014). *Civics Framework for the 2014 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/civics/2014-civics-framework.pdf>
- Downs, R. & Heffron, S. (Eds.). *Geography for Life: The National Geography Standards, Second Edition*. (2012). Geography Education National Implementation Project. Retrieved from <https://www.nationalgeographic.org/standards/national-geography-standards/>
- Draft Kentucky Social Studies Standards for the Next Generation, 2015. *Kentucky Academic Standards, Social Studies* (current). Retrieved from https://education.ky.gov/curriculum/standards/kyacadstand/Documents/Kentucky_Academic_Standards_Social_Studies.pdf
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- National Assessment Governing Board, the American Institutes for Research, the Council for Economic Education, and the Council of Chief State School Officers. (2012). *Economics Framework for the 2012 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/economics/2012-economics-framework.pdf>

- National Center for History in the Schools. (1996). United States history content standards for grades 5-12. In *National Standards for History*. Los Angeles, CA: University of California, Los Angeles. Retrieved from <https://phi.history.ucla.edu/nchs/united-states-history-content-standards/>
- National Council for the Social Studies. (2013). The College, Career, and Civic Life (C3) Framework for Social Studies State Standards: Guidance for Enhancing the Rigor of K-12 Civics, Economics, Geography, and History. Silver Spring, MD: NCSS. Retrieved from <https://www.socialstudies.org/sites/default/files/c3/C3-Framework-for-Social-Studies.pdf>
- Partnership for 21st Century Learning. (2016). *Framework for 21st Century Learning*. Washington, D.C.: P21. Retrieved from <http://www.p21.org/about-us/p21-framework>
- Review of state academic standards documents (Colorado, Connecticut, Florida, Illinois, Indiana, Iowa, Kansas, Maryland, Massachusetts, Minnesota, Nebraska, New Jersey, New York, Ohio, Tennessee, Utah, Wisconsin)

Additionally, participants brought their own knowledge to the process. The writers also thoughtfully considered feedback from the public and social studies community.

Throughout the process, the teacher writers from across Kentucky carefully reviewed the Massachusetts and Indiana social studies standards documents, and these state standards informed the teachers' work.

When developing the proposed *KAS for Social Studies*, the teacher writers from across Kentucky reviewed both the 2003 and 2018 versions of the *Massachusetts History and Social Science Curriculum Framework*. In addition to informing the development of the architecture and vision for the work, these documents informed the development of the *KAS for Social Studies* in regards to the organization and composition of the Grade Specific Overviews (grade level introductions, Looking Back, Looking Ahead: Progression snapshots, connections to the *KAS for Reading and Writing* and some of the themes utilized kindergarten through grade 8). Additionally, the proposed *KAS for Social Studies* was informed by the revisions to the 2018 document with the addition of skills, such as “formulating questions, conducting research, evaluating sources, and synthesizing information” found on page 15 of the *Massachusetts History and Social Science Curriculum Framework*.

When comparing the *Massachusetts History and Social Science Curriculum Framework*, it is important to note that Massachusetts has much more specific guidelines and policies that impact the design and detail of their document. For example, page 13 of the 2018 document states the following: “As to the core subject of history and social science, the law directs that: ‘The standards shall provide for instruction in at least the major principles of the Declaration of Independence, the United States Constitution, and the Federalist Papers. They shall be designed to inculcate respect for the cultural, ethnic, and racial diversity of the commonwealth and for the contributions made by diverse cultural, ethnic and racial groups to the life of the commonwealth. The standards may provide for instruction in the fundamentals of the history of the commonwealth as well as the history of working people and the labor movement of the United States....The board may also include in the standards...an awareness of global education and geography.’” The document continues with “the law further directs the Board and Commissioner

to institute a process for drawing up curriculum frameworks for each of the core subjects, and to update, improve, and refine the standards and frameworks periodically.”

As seen on pages 7-9 in the proposed *KAS for Social Studies* under the Legal Basis section, similar laws in Kentucky do not exist. The specificity of the Massachusetts laws varies greatly from Kentucky’s local control laws; as a result, the *Massachusetts History and Social Science Curriculum Framework* must be much more specific than the proposed *KAS for Social Studies*. Otherwise, the *KAS for Social Studies* would be in danger of violating requirements, such as KRS 160.345, among others.

Moreover, the *Massachusetts History and Social Science Curriculum Framework* is a curricular framework and currently is not used at the state level to develop assessments as Massachusetts does not conduct social studies assessments statewide.

A study done by the Woodrow Wilson Institute, which concluded that Kentucky ranked second to last in knowledge of American History, was used by a commenter as evidence to argue against the proposed *KAS for Social Studies*. The survey done by the Woodrow Wilson Foundation was given to 41,000 adult participants. The survey was sent directly to people based on demographic data. The survey was based solely on the test bank of questions that relate to United States Citizenship and Immigration Services test. As the survey was given to adults, the results have no implications on the standards. In 2017, the Kentucky General Assembly passed Senate Bill 159 to address the lack of civic knowledge among Kentucky citizens. Since KRS 158.141 (2017) requires that all Kentucky students must pass a citizenship exam before graduation, the Kentucky General Assembly has acted to address the knowledge deficiencies identified in this survey.

The Thomas Fordham Institute conducted its review of state social studies standards entitled, *The State of State U.S. History Standards, 2011*. While Massachusetts and Indiana did receive an A- from the Fordham Institute, both of these states revised their standards since this report was conducted. Massachusetts social studies standards were revised in 2018, and Indiana social studies standards were revised in 2014. To inform the work of the writers, the KDE provided both the Massachusetts (2003 and 2018 versions) and Indiana state social studies standards. Additionally, the writers were provided the *U.S. History Framework for the 2014 National Assessment of Educational Progress*, among other NAEP frameworks, to inform the design of the *KAS for Social Studies*. The Fordham Institute recommended the NAEP framework as a model for states. The following quote can be found on page 2 of the Fordham report: “The study also reviewed the framework for the National Assessment of Educational Progress’s (NAEP) U.S. history examination and found it deserving of an A-minus. Thus, there are several national models - from the strongest state standards to the NAEP - that lagging states could and should emulate going forward.” This information and the additional documents provided to inform the writers’ work can be found on pages 10-11 in the proposed *KAS for Social Studies*.

Throughout the process, the KDE conducted focus groups on the draft standards with questions that were crafted from the Fordham criteria. In the Appendix A of the report on page 164, the report explains the “Methods, Grading, and Criteria” used when determining whether the standards were of high quality. The criteria are divided into two categories: (1) content and rigor and (2) clarity and specificity. It is important to note that while the report also details content-

specific criteria for U.S. history that “provide illustrative examples of the kinds of essential content that rigorous U.S. history standards would demand all students have learned by the end of grades 4, 8, and 12 respectively,” this listing was not used to obtain a score, did not factor into combined totals and did not translate into a letter grade.

The criteria listed for content and rigor and clarity and specificity informed the questions crafted and posed during the focus groups. The KDE conducted focus groups throughout the development of the proposed *KAS for Social Studies* using the criteria above. The feedback provided by these focus groups informed the writers’ thoughtful review and revision of the *KAS for Social Studies* throughout the entire process.

According to the 2011 report, the state with the highest score was South Carolina. When providing an overview for the reason why South Carolina received an A rating, the report stated that, unlike Kentucky, South Carolina is not a local control state. As a result, they are able to provide additional “curriculum” support documents that would violate Kentucky’s local control laws (page 132). The revised *KAS for Social Studies* outlines the minimum content required of all Kentucky students at each grade level. Additionally, the standards address what is to be learned - what students must know and do - but do not address how learning experiences are to be designed or what resources should be used. While the KDE is responsible for the development of standards, state law assigns each local SBDM council the authority to design the school’s curriculum and determine appropriate instructional materials based on language found in KRS 160.345. KRS 160.345 states the following:

The school council shall determine which textbooks, instructional materials, and student support services shall be provided in the school. Subject to available resources, the local board shall allocate an appropriation to each school that is adequate to meet the school's needs related to instructional materials and school-based student support services, as determined by the school council. The school council shall consult with the school media librarian on the maintenance of the school library media center, including the purchase of instructional materials, information technology, and equipment;...

The school council shall adopt a policy to be implemented by the principal in the following additional areas: 1. Determination of curriculum, including needs assessment, curriculum development and responsibilities under KRS 158.6453(19);...

Therefore, the standards purposefully establish learning outcomes and leave curricular decisions to those who are best suited to make those choices, local schools. By carefully constructing progressions that balance the acquisition of skills and content, the standards allow students to develop a seamless understanding of the crucial concepts of the social studies disciplines.

It also is important to note that the Fordham Report focused on U.S. history standards; it does not allocate for a balanced approach to studying the social studies. In developing the architecture of the revised *KAS for Social Studies*, teacher writers from across Kentucky were committed to striking a balance between the content and skills students are required to know and be able to do as both are required to successfully engage in “doing” social studies. They believe educators must impart meaningful content to students and teach them how to think critically about the

world and their place in it relative to past events. Neither development of the inquiry practices nor development of the knowledge and understanding within the disciplinary lenses of civics, economics, geography or history is sufficient on its own to equip young people with the knowledge and skills necessary to carry on the ideals of the founders.

After careful review, the agency declines to amend the regulation.

(8) Subject Matter: Processes and Content

(a) Comments: The comments in this section relate to the amount of disciplinary processes and content featured in the standards document.

One commenter stated that process trumps content in the standards document.

Another commenter stated the proposed *KAS for Social Studies* was not written by Kentucky teachers and that the teachers were only given one document, *The College, Career and Civic Life (C3) Framework*, as the foundational document for this work. This commenter also stated that exposing students to higher order cognitive abilities, taught independently of content, adversely affects students. The commenter further cited John Hattie that the teacher needs to be the facilitator of learning, not the guide on the side.

An additional commenter believes that the *KAS for Social Studies* document is synonymous with the C3 Framework. Further, the commenter believes the type of inquiry approach at the center of the C3 Framework is not research based. The commenter continued that constructivist instructional design (inquiry, project based learning, student led) actually harms struggling students. The individual suggested the need to follow a prescribed social studies information base, similar to the idea of Cultural Literacy as defined by E.D. Hirsch, and also promoted direct explicit instruction with the teacher as the facilitator of learning.

One commenter stated the belief that the writers were “out of touch” with classroom teachers.

Another commenter stated that the "C-3 Framework is totally flawed" and will "not provide any portion of a knowledge base" for a student to "become a productive citizen" and "leader of the future".

Individuals speaking or offering written comments of concerns on this subject matter include: Richard Innes, Gerry Rosenberger, Libby Rosenberger and Donnie Wilkerson.

(b) Response: The agency carefully considered the comments.

Design decisions for the proposed *KAS for Social Studies* were informed by reviews of current evidence-based practices, state social studies standards and public comments regarding the 2006 *KAS for Social Studies*. The design is intended to convey the importance of both conceptual knowledge and understanding within four disciplinary strands in social studies (civics, geography, economics and history) and the development of the inquiry practices of questioning, investigating, using evidence and communicating conclusions. Grade-level and grade-span

concepts within each of the four disciplinary lenses provide the specificity, content and context for the appropriate application of the practices. The complexity of the standards within the concepts and practices progresses from kindergarten through high school.

In developing the architecture of the revised *KAS for Social Studies*, the writers, current classroom teachers from across Kentucky, were committed to striking a balance between the content and skills students are required to know and be able to do as both are required to successfully engage in “doing” social studies. They believe educators must impart meaningful content to students and teach them how to think critically about the world and their place in it relative to past events. Neither development of the inquiry practices nor development of the knowledge and understanding within the disciplinary lenses of civics, economics, geography or history is sufficient on its own to equip young people with the knowledge and skills necessary to carry on the ideals of the founders.

The KDE provided the following foundational documents to inform the writing team’s work:

- Center for Civic Education. (2014). *National Standards for Civics and Government*. Retrieved from <http://www.civiced.org/standards>
- Council for Economic Education. (2010). *Voluntary National Content Standards in Economics*. Retrieved from <https://www.councilforeconed.org/wp-content/uploads/2012/03/voluntary-national-content-standards-2010.pdf>
- Council of Chief State School Officers. (2011). *Global Competence Matrices*. Washington, D.C. Retrieved from <https://teaching.unsw.edu.au/sites/default/files/upload-files/Global%20Competence%20Matrices.pdf>
- Council of Chief State School Officers with the American Historical Association, the American Institutes for Research, the National Council for History Education, and the National Council for the Social Studies. (2014). *U.S. History Framework for the 2014 National Assessment of Educational Progress*. Retrieved from <https://nagb.gov/content/nagb/assets/documents/publications/frameworks/history/2014-history-framework.pdf>
- Council of Chief State School Officers with the National Assessment Governing Board. (2010). *Geography Framework for the 2010 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/geography/2010-geography-framework.pdf>
- Council of Chief State School Officers, Center for Civic Education, the American Institutes for Research for the National Assessment Governing Board. (2014). *Civics Framework for the 2014 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/civics/2014-civics-framework.pdf>
- Downs, R. & Heffron, S. (Eds.). *Geography for Life: The National Geography Standards, Second Edition*. (2012). Geography Education National Implementation Project. Retrieved from <https://www.nationalgeographic.org/standards/national-geography-standards/>
- Draft Kentucky Social Studies Standards for the Next Generation, 2015. *Kentucky Academic Standards*, Social Studies (current). Retrieved from https://education.ky.gov/curriculum/standards/kyacadstand/Documents/Kentucky_Academic_Standards_Social_Studies.pdf

- Kentucky Department of Education. (2009). *Characteristics of Highly Effective Social Studies Teaching & Learning in Kentucky Schools*. Frankfort, KY: Retrieved from https://www.researchgate.net/profile/Mohamed_Hammad11/post/What_are_the_qualities_required_of_teachers_to_teach_21st_century_learners/attachment/59d658af79197b80779ae7e6/AS%3A539431640551424%401505621933741/download/Characteristics+of+Highly+Effective+Social+Studies+Teaching+and+Learning+in+Kentucky+Schools.pdf
- National Assessment Governing Board, the American Institutes for Research, the Council for Economic Education, and the Council of Chief State School Officers. (2012). *Economics Framework for the 2012 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/economics/2012-economics-framework.pdf>
- National Center for History in the Schools. (1996). United States history content standards for grades 5-12. In *National Standards for History*. Los Angeles, CA: University of California, Los Angeles. Retrieved from <https://phi.history.ucla.edu/nchs/united-states-history-content-standards/>
- National Council for the Social Studies. (2013). *The College, Career, and Civic Life (C3) Framework for Social Studies State Standards: Guidance for Enhancing the Rigor of K-12 Civics, Economics, Geography, and History*. Silver Spring, MD: NCSS. Retrieved from <https://www.socialstudies.org/sites/default/files/c3/C3-Framework-for-Social-Studies.pdf>
- Partnership for 21st Century Learning. (2016). *Framework for 21st Century Learning*. Washington, D.C.: P21. Retrieved from <http://www.p21.org/about-us/p21-framework>
- Review of state academic standards documents (Colorado, Connecticut, Florida, Illinois, Indiana, Iowa, Kansas, Maryland, Massachusetts, Minnesota, Nebraska, New Jersey, New York, Ohio, Tennessee, Utah, Wisconsin)

Additionally, participants brought their own knowledge to the process. The writers also thoughtfully considered feedback from the public and social studies community. *The C3 Framework* was one of 31 foundational documents provided to inform the writing team’s work. *The C3 Framework for the Social Studies* is a framework, not a set of standards. The *C3 Framework* does not include all that can or should be included in a set of robust social studies standards and intentionally preserves the critical choices around the selection of curricular content taught at each grade level, a decision best made by each state. The Framework aims to support states in creating standards that prepare young people for effective and successful participation in college, career and civic life.

After careful review, the agency declines to amend the regulation.

(9) Subject Matter: Defining the Social Studies as Four Strands

(a) Comments: The comments in this section relate to the way that social studies is defined within the standards document.

One commenter stated that “the Revised Standards indicate social studies has only four strands: civics, geography, economics and history.” The commenter stated that “the Kentucky Department of Education’s (KDE) website page for social studies currently indicates that many more strands pertain, including in addition to those just mentioned: anthropology, archaeology,

law, philosophy, political science, psychology, religion, sociology, religion, sociology as well as content from the humanities.” The commenter added this KDE definition of social studies is apparently taken from the National Council for the Social Studies (NCSS).

Another commenter stated the proposed standards omit many subjects that need to be taught to Kentucky students.

Individuals speaking or offering written comments of concerns on this subject matter include: Ray Davis and Richard Innes.

(b) Response: The agency carefully considered the comments.

The NCSS defined social studies as follows on their “About” page (The link may be accessed here: <https://www.socialstudies.org/about>): “Social studies is the integrated study of the social sciences and humanities to promote civic competence. Within the school program, social studies provides coordinated, systematic study drawing upon such disciplines as anthropology, archaeology, economics, geography, history, law, philosophy, political science, psychology, religion, and sociology, as well as appropriate content from the humanities, mathematics, and natural sciences.” While the NCSS does define social studies as stated above, the teacher writers from across Kentucky were not required to design a set of social studies standards based on a social studies organization’s definition of the field. Rather, the teacher writers from across Kentucky were required to design a set of social studies standards according to SB 1 (2017).

SB 1 (2017) states that the standards revision to the content standards shall, focus on critical knowledge, skills, and capacities needed for success in the global economy; result in fewer, but more in-depth standards to facilitate mastery learning; communicate expectations more clearly and concisely to teachers, parents, students and citizens; be based on evidence-based research; consider international benchmarks; and ensure that the standards are aligned from elementary to high school to post-secondary education so that students can be successful at each education level.

In accordance with SB 1 (2017), design decisions for the proposed *KAS for Social Studies* were informed by reviews of current evidence-based practices, state social studies standards and public comments regarding the 2006 *Kentucky Academic Standards for Social Studies*.

When developing the proposed *KAS for Social Studies*, the teacher writers from across Kentucky reviewed 17 state social studies standards documents: Colorado, Connecticut, Florida, Illinois, Indiana, Iowa, Kansas, Maryland, Massachusetts, Minnesota, Nebraska, New Jersey, New York, Ohio, Tennessee, Utah and Wisconsin. Of the 19 documents studied, including the current *Kentucky Academic Standards for Social Studies* (2006) and the *Kentucky Social Studies for the Next Generation* (2015- not adopted), all of the states, except Utah, organize the social studies standards by the four disciplines of civics, economics, geography and history.

Ten state standards documents strictly adhere to only organizing the standards by the four disciplines of civics, economics, geography and history. Five state standards documents include behavioral science standards; however, in some cases, these standards are electives or

supplementary course standards. Four state standards documents, including the *Kentucky Academic Standards for Social Studies* (2006), have a culture strand, but the name of this strand varies among states. Two states have state history as a strand while others have the state history standards embedded throughout the document. One state changes the discipline of focus depending on the year of study.

Based on this information, the teacher writers from across Kentucky decided to design the proposed *KAS for Social Studies* (2019) around the four disciplines of civics, economics, geography and history. The design is intended to convey the importance of both conceptual knowledge and understanding within four disciplinary strands in social studies (civics, geography, economics and history) and the development of the inquiry practices of questioning, investigating, using evidence and communicating conclusions. Grade-level and grade-span concepts within each of the four disciplinary lenses provide the specificity, content and context for the appropriate application of the practices. The complexity of the standards within the concepts and practices progresses from kindergarten through high school.

After careful review, the agency declines to amend the regulation.

(10) Subject Matter: Length of the Standards Document

(a) Comments: The comments in this section relate to the length (in pages) of the social studies document.

One commenter stated that while the social studies document covers four different strands, the *KAS for Social Studies* document is shorter (229 pages) than other recently adopted *Kentucky Academic Standards* documents (reading and writing with 458 pages and mathematics with 258 pages).

Another commenter stated the additional Grade Specific Overviews and Disciplinary Clarifications added to the page length of the document. With the addition of sections, such as Key Vocabulary, Sample Evidence of Learning and Disciplinary Clarifications, and not additional content standards, the original 60 page document increased to 234 pages. Yet, the commenter argued that the “current (much more clear and complete, though certainly not perfect) social studies standards [portion of the document] is also only 60 pages long.”

Individuals speaking or offering written comments of concerns on this subject matter include: Richard Innes and Donnie Wilkerson.

(b) Response: The agency carefully considered the comments.

The page length of the proposed *KAS for Social Studies* should not be compared to other *Kentucky Academic Standards*, such as mathematics and reading and writing, because they are standards documents for different content areas. The page length of the proposed *KAS for Social Studies* is 229 pages, which is more than the page length of other social studies standards documents for recently revised social studies standards of the following states: Connecticut 2015, Minnesota 2013 (150-200 pages); Utah 2016 (100-150 pages); Iowa 2017 (54 pages).

Based on feedback provided, grade-level overviews were added by teacher writers from across Kentucky in kindergarten through grade 8. In K-8, each grade level is introduced with a grade-level overview that includes an expanded grade-level introduction, suggested key vocabulary, connections to the previous and following grade, an explanation of what inquiry looks like in practice and opportunities for cross disciplinary connections. The grade-level theme presented in the introduction drives the standards within the concepts and practices through the four disciplines of civics, economics, geography and history.

Feedback indicated that stakeholders valued the additional clarity of an expanded introduction specific to each grade level. Teacher writers drafted the expanded introduction to provide additional information on the grade-level theme and explain how the goal of social studies education connects with students as they progress through their social studies education. Additionally, the expanded introduction provides examples of how learners engage with each of the four disciplines during the year.

Feedback indicated that stakeholders valued suggested key vocabulary specific to each grade level. The writing committee identified terms that they felt were essential to understanding the content and skills in the standards. The identified key vocabulary terms listed are possible suggestions; they are not the only terms that may be used during instruction.

Feedback indicated that stakeholders valued the progression snapshots found in the overviews. Short summaries of the previous and following grades are included to provide teachers information on what a student's social studies learning experience is focused on in the previous and following grade. This short snapshot provides a short narrative on how the current grade's theme progresses.

Feedback provided indicated that supports were needed to assist teachers in seeing how the inquiry and discipline strand standards interact in a learning experience. Kentucky teacher writers crafted this section to provide guidance on how to combine the standards into a learning experience for students and how the standards work together to ensure students are engaged in the inquiry practices throughout K-8. The identified sample evidence of learning is a possible suggestion of how the disciplinary strand standards interact with the inquiry practices; however, it is not the only pathway and is not comprehensive to obtain mastery of the standards.

Feedback provided indicated that teachers needed support, especially at the elementary school level, when understanding how cross disciplinary connections could be made among the content standards. In this section, teacher writers made connections between the *KAS for Social Studies* and the *KAS for Reading and Writing*.

Based on feedback provided, disciplinary clarifications, following the grade-level standards, were added in kindergarten through grade 8 by teacher writers from across Kentucky. The disciplinary clarifications include sample ideas of content and concepts to help teachers better understand the expectations of the standards. The identified disciplinary clarifications are possible suggestions; however, they are not the only pathways and are not comprehensive to obtain mastery of the standards.

After careful review, the agency declines to amend the regulation.

(11) Subject Matter: Age-Appropriateness of Standards

(a) Comments: The comment in this section relates to the age-appropriateness of a clarification provided on a standard.

One commenter expressed concerns about the age-appropriateness of a clarification for a grade-level standard. The commenter pointed to an example in the Disciplinary Clarifications for Kindergarten (K.G.HI.1) where students are asked to "talk about a rule posted on the wall which says to take turns when speaking." The commenter contended kindergarten students would not be ready for this task. The commenter also pointed to the National Reading Panel report of 2000 and a recent MRI study to contend if this approach might lead to inappropriate teaching because teachers would be asking students to use the wrong side of their brain.

Individuals speaking or offering written comments of concerns on this subject matter include: Richard Innes.

(b) Response: The agency carefully considered the comments.

Information found in the Disciplinary Clarifications are not standards; they are suggestions, not the only pathways and are not comprehensive to obtain mastery of the standards. It is important to note that the Disciplinary Clarification does not state that students would be required to read the rule on the wall. The text is merely stating that the rule might be posted on the wall. The Disciplinary Clarifications were written by teacher writers from across Kentucky.

When developing the proposed *KAS for Social Studies*, the teacher writers were informed by reviews of current evidence-based practices, state social studies standards and public comments regarding the *KAS for Social Studies* (2006). The design is intended to convey the importance of both conceptual knowledge and understanding within four disciplinary strands in social studies (civics, geography, economics and history) and the development of the inquiry practices of questioning, investigating, using evidence and communicating conclusions. Grade-level and grade-span concepts within each of the four disciplinary lenses provide the specificity, content and context for the appropriate application of the practices. The complexity of the standards within the concepts and practices progresses from kindergarten through high school.

Additionally, participants brought their own knowledge to the process. The writers also thoughtfully considered feedback from the public and social studies community.

After careful review, the agency declines to amend the regulation.

(12) Subject Matter: Amount of United States and Kentucky History

(a) Comments: The comments in this section relate to the amount of coverage given to U.S. History.

One commenter wanted to see more American history taught in schools. The commenter stated that much of the history work they have seen has been "watered down." The commenter wanted to see more taught about American culture instead of learning about cultures from around the world. The commenter believes that social studies "needs a huge boost" to understand what "made America great."

A commenter also provided extensive comments about how specific people, events and terminology relating specifically to U.S. history were omitted from the standards document. The commenter was concerned that those interested in American history are being ignored by our education system. The commenter stated that students need to be very aware of "our American history." The commenter also states that it is important to make sure we do not repeat the negatives things from the past, but emulate the positives.

Another commenter stated the need for more of a study on American history, stating that one year was not enough.

Another commenter stated that there needed to be more "Kentucky" and "Social Studies History".

An additional commenter stated the need to include more state and national history and geography.

Individuals speaking or offering written comments of concerns on this subject matter include: Mary Carter, Frank Gaskin, Richard Innes, Candy Kenney, Lisa New, Sally Price and Libby Rosenberger.

(b) Response: The agency carefully considered the comments.

The *KAS for Social Studies* outlines the minimum standards Kentucky students should learn in each grade level kindergarten through 8 or high school grade-span. The standards are the floor, not a ceiling. The standards place an equal importance on both the mastery of important social studies concepts and disciplinary practices. Throughout a child's social studies education, students engage in the inquiry practices – questioning, investigating, using evidence and communicating conclusions. Students use these practices to acquire, refine and extend knowledge and understanding of key social studies concepts within the four disciplinary lenses of civics, economics, geography and history.

Throughout a child's kindergarten through high school social studies experience, students have several opportunities to engage in studies on American history. A student's engagement with U.S. history begins as early as kindergarten. The focus of kindergarten is to provide students with rich explorations of topics that affect them and their personal environment. Students also have opportunities to compare how life in the past is different from today, with respect to their own experiences. The study of U.S. history continues in grade 1 as students expand their studies from a personal to a local level, to include the state. The focus of grade 2 continues to be the development of students' understandings of the concept of community by extending their studies

from their local and state community to communities found in North America (Canada, Mexico and the U.S.). Students begin to dive into U.S. history in grade 4 as students' knowledge of local, national and world social studies expands to discover how and why people move from one place to another. Through the lens of European Exploration to the Thirteen Colonies, students engage in the study of geographic, political, economic and cultural reasons people move as well as what they experience during the transition. The focus of grade 5 constitutes a series of explorations about the people, places and ideas that make up the story of the nation, the United States. Students also engage in deeper learning about our government and how it is structured. Students revisit and expand upon this theme in Grade 8 and engage in U.S. history studies throughout high school.

Moreover, the *KAS for Social Studies* includes K-12 standards that focus on examining each of these lenses through a study of Kentucky. Throughout a child's social studies education, a student will engage in discipline specific Kentucky studies, where appropriate. As a result, a student will engage with more Kentucky studies as a result of the proposed *KAS for Social Studies*. Feedback indicated that students would know more about Kentucky after engaging with these standards and students would understand U.S. history better as it relates to Kentucky.

While the KDE is responsible for the development of standards, state law assigns each local SBDM council the authority to design the school's curriculum and determine appropriate instructional materials based upon language found in KRS 160:345. Therefore, the KDE does not adopt, select or recommend specific curricula for coursework.

After careful review, the agency declines to amend the regulation.

(13) Subject Matter: Technical Issues

(a) Comments: The comments in this section relate to technical issues within the language and grammar of the social studies standards document.

The commenter suggested that on page 10 of the *KAS for Social Studies* document the first line read: "The writing team envisioned standards that would afford schools an opportunity to provide social studies learning experiences...."

The commenter suggested on page 10 that the last sentence of the first paragraph read: "In an ever-changing and increasingly interconnected world, students must be life-long learners, critical thinkers and questioners who can undertake multidimensional, complex reasoning."

The commenter stated that the definition of "microeconomics" is different than that stated by Business Dictionary. The commenter suggested following a definition that aligns closer to that of Business Dictionary. Specifically the commenter stated that definition should include more reference to personal financial skills.

The commenter suggested that on page 43 "Appalachian mountains" should be changed to "Appalachian Mountains."

The commenter stated that two sentences are citations from a source that does not have any attribution. The first sentence discussed is the first sentence in the description of “History.” The second sentence discussed is the first sentence in the description of “Geography.” Additionally, the commenter asks, “Is Google really an authoritative source?”

The agency noted that "Reading" was included by mistake in the title of the standards in 704 KAR 8:060 and needs to be removed.

When responding to comments provided on the proposed *KAS for Social Studies*, the agency realized the documented incorporated by reference omitted the National Assessment of Educational Progress (NAEP) Frameworks as foundational documents provided during the revision process. The NAEP Frameworks provided include:

- *Civics Framework for the 2014 National Assessment of Educational Progress*
- *Economics Framework for the 2012 National Assessment of Educational Progress*
- *Geography Framework for the 2014 National Assessment of Educational Progress*
- *U.S. History Framework for the 2014 National Assessment of Educational Progress*

Individuals speaking or offering written comments of concerns on this subject matter include: Richard Innes.

(b) Response: The agency carefully considered the comments.

The commenter suggested on page 10 of the *KAS for Social Studies* document incorporated by reference that the first line read: “The writing team envisioned standards that would afford schools an opportunity to provide social studies learning experiences...”. After careful consideration, the agency declines to amend the regulation to modify the phrase “life-long critical thinkers and questioners who can undertake multidimensional, complex reasoning.” Teacher writers from across Kentucky wrote the vision statement and this text captures their vision for the work.

After careful consideration, the agency declines to amend the regulation to modify the definition of microeconomics. When developing the proposed *KAS for Social Studies*, the teacher writers from across Kentucky were informed by reviews of current evidence-based practices, state social studies standards, national standards, NAEP frameworks and public comments regarding the 2006 *Kentucky Academic Standards for Social Studies*. Additionally, participants brought their own knowledge to the process. The writers also thoughtfully considered feedback from the public and social studies community. Also, in 2018, the Kentucky General Assembly passed KRS 158.1411, which required that the “Kentucky Board of Education shall promulgate administrative regulations establishing academic standards and a graduation requirement for financial literacy.” Since the agency is developing a separate set of standards to address financial literacy, it is unnecessary to amend the definition of microeconomics to emphasize personal finance skills in the *KAS for Social Studies* document incorporated by reference.

The agency will change "Appalachian mountains" to "Appalachian Mountains" as the latter is the proper name of the mountain range.

The agency carefully reviewed all comments and made changes to the regulation to change two sentences in the document that do not provide attribution to a source. The first sentence discussed is the first sentence in the description of “History.” The second sentence discussed is the first sentence in the description of “Geography.”

The agency also found that Reading was included in the name of the standards in 704 KAR 8:060. Therefore, the agency will change the regulation to remove "Reading" from the title of the *Kentucky Academic Standards for Social Studies* in 704 KAR 8:060 on page 2, line 4.

A reference to the *NAEP Frameworks* will be added on page 10 and 11 of 704 KAR 8:060 document incorporated by reference to rectify the omission of these documents.

Summary of the Statement of Consideration and Action Taken by Promulgating Administrative Body

The agency received comments related to 704 KAR 8:060, Kentucky Academic Standards (KAS) for Social Studies. The agency responded to the comments and amends the administrative regulation as follows:

Comments were broadly categorized as: support for the adoption of 704 KAR 8:060, Kentucky Academic Standards (KAS) for Social Studies, more time needed for revision, writers knowledge of school-based decision making statutes, standards versus curriculum, assessment of the standards and a commenter pointed out some technical issues.

The agency received support for the *KAS for Social Studies*. The commenters praised the process that involved Kentucky teachers in the revision of standards and also praised the way the *KAS for Social Studies* balanced content knowledge with disciplinary skills. Commenters recognized that the standards are grounded in research and focus on the critical knowledge, skills and capacities needed to become well-rounded, civically-engaged citizens.

The agency received comments expressing that more time was needed for revision. The argument the commenters used to support spending more time on the revision process included reviewing standards from other states, the perceived emphasis of process or content, the amount of United States and Kentucky history, the length of the standards, and the age-appropriateness of the standards.

One commenter questioned the knowledge of the teachers who wrote the standards because the critical role of the school-based decision making council in curriculum development was not made clear. Also, comments were received that illustrated there still is some misunderstanding of the statutory role of the Kentucky Board of Education in setting standards and the roles of the local district, schools and councils in implementing them through curriculum and instruction.

The agency received comments expressing concern about the way social studies standards would be assessed if more specific people, concept and events were not included in the standards so teachers would know what was going to be assessed on the state assessment. A commenter expressed concern that students were only taught content in the year it was to be assessed. The agency also received comments expressing concern that items not mentioned in the *KAS for Social Studies* will not be taught at all.

The agency carefully considered all comments submitted by the public and will amend the regulation and the document incorporated by reference in the following ways:

Revisions to regulation, 704 KAR 8:060, Kentucky Academic Standards for Social Studies

Page 2

Line 4-5

“Reading and” will be deleted.

Revisions to 704 KAR 8:060, Kentucky Academic Standards for Social Studies, Document Incorporated by Reference.

Pages 10 and 11

The following NAEP Frameworks have been added to the foundational documents list:

- Council of Chief State School Officers with the American Historical Association, the American Institutes for Research, the National Council for History Education, and the National Council for the Social Studies. (2014). *U.S. History Framework for the 2014 National Assessment of Educational Progress*. Retrieved from <https://nagb.gov/content/nagb/assets/documents/publications/frameworks/history/2014-history-framework.pdf>
- Council of Chief State School Officers with the National Assessment Governing Board. (2010). *Geography Framework for the 2010 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/geography/2010-geography-framework.pdf>
- Council of Chief State School Officers, Center for Civic Education, the American Institutes for Research for the National Assessment Governing Board. (2014). *Civics Framework for the 2014 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/civics/2014-civics-framework.pdf>
- National Assessment Governing Board, the American Institutes for Research, the Council for Economic Education, and the Council of Chief State School Officers. (2012). *Economics Framework for the 2012 National Assessment of Educational Progress*. Retrieved from <https://www.nagb.gov/content/nagb/assets/documents/publications/frameworks/economics/2012-economics-framework.pdf>

Page 12

The original text in the document stated “local schools and districts choose to meet those minimum required standards using a locally adopted curriculum.” The statement will now read, “Local schools and districts choose to meet those minimum required standards using a locally adopted curriculum according to KRS 158.6453, which outlines the SBDM’s role in determining curriculum.”

Page 43

Disciplinary Clarifications, “mountains” will be capitalized in referring to the “Appalachian Mountains”.

Page 15

The original text in the document stated, “Geography is the study of the physical features of the earth and its atmosphere and of human activity as it affects and is affected by these, including the distribution of populations and resources, land use and industries.” It now will read, “Geography is the study of physical and human activity as well how they interact within space, including the distribution of populations and resources, land use and culture.”

Page 15

The original text in the document stated, “History is the study of past events, often including an explanation of their causes.” It will now read, “History is the study of past events, commonly with a focus on their causes and intended/unintended effects.”