

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

Kentucky Board of Education
Department of Education
(Not Amended After Comments)

I. The public hearing on 704 KAR 8:060, scheduled for February 22, 2023, at 10:00 a.m. at the Kentucky Department of Education, 300 Sower Boulevard, Frankfort, Kentucky, was canceled; however, written comments were received during the public comment period.

II. The following people submitted written comments:

<u>Name and Title</u>	<u>Agency/Organization/Entity/Other</u>
Darcie Cayaba	Unspecified
Shereen Bhalla, Ph.D.	Hindu American Foundation

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

Name and Title
Lauren Gallicchio, Education Academic Program Consultant, Office of Teaching and Learning
Heather Ransom, Education Academic Program Consultant, Office of Teaching and Learning
Micki Ray, Chief Academic Officer, Office of Teaching and Learning
Todd Allen, General Counsel, Office of Legal Services

IV. Summary of Comments and Responses

(1) Subject Matter: Economics, Cryptocurrency

(a) Comment: Darcie Cayaba - Cryptocurrency is an important and relevant topic related to investments that should be included in the economics strand of the *Kentucky Academic Standards (KAS) for Social Studies*.

(b) Response: KRS 158.196(3)(a) states: “Notwithstanding the every six (6) year schedule set forth in KRS 158.6453(2)(a), no later than July 1, 2023, the Kentucky Department of Education shall incorporate fundamental American documents and speeches into the grade-level appropriate middle and high school social studies academic standards and align corresponding assessments, including but not limited to” The proposed amendments to *Kentucky Academic Standards for Social Studies*, the document incorporated by reference in 704 KAR 8:060, are to comply with KRS 158.196. While the agency acknowledges this comment, it is outside of the scope of KRS 158.196. Therefore, no amendments have been made in response to this comment.

- (2) Subject Matter: Indian history and Hindu contributions
- (a) Comment: Shereen Bhalla, Ph.D. - The commenter requested that the empire of Chola India be added to the Disciplinary Clarification of standard 6.E.ST.1. Additionally, the commentator requested that the verb used in standard 6.E.ST.1 be changed from "compare" to "analyze." The commenter also requests replacing the "Sepoy Rebellion of 1857" with the "First War of Indian Independence" in the disciplinary clarification statement for standard HS.WH.CE.7. Furthermore, the commentator requests that "Hindu-" be added to the disciplinary clarification statement for standard HS.WH.CH.2 where "Arabic numerals" are mentioned.
- (b) Response: While the Kentucky Department of Education (KDE) is responsible for the development of high-quality academic standards, KDE does not adopt, select or recommend specific curricula for coursework. Per KRS 160.345(2)(g), "[t]he local superintendent shall determine which curriculum, textbooks, instructional materials, and student support services shall be provided in the school after consulting with the local board of education, the school principal, and the school council and after a reasonable review and response period for stakeholders in accordance with local board of education policy."

It is important to note the difference between standards and disciplinary clarifications. A standard represents a goal or outcome of an educational program; standards are vertically aligned expected outcomes for all students. The standards do not dictate the design of a lesson plan or how units should be organized. The standards establish a statewide baseline of what students should know and be able to do at the conclusion of a grade or grade-span. The proposed version of the *Kentucky Academic Standards for Social Studies*, the document incorporated by reference in 704 KAR 8:060, outlines the minimum content requirements for Kentucky students at each grade level or grade band. 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.

The disciplinary clarifications, however, 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. Therefore, a local curriculum may include additional information not contained within the disciplinary clarification statements.

Specifically, the agency declines to add the Cholas Empire to the disciplinary clarification statement of standard 6.E.ST.1. In the justification provided, the commentator states, "the Cholas ruled most of south India from 800 to 1300 CE." Since the grade 6 theme is Development of Civilizations, the timeframe noted in the *KAS for Social Studies* for grade 6 is 3500 BCE-600 CE. Therefore, this empire is outside of the time frame explored by grade 6 students in Kentucky. In addition, this comment is outside of the scope of KRS 158.196.

The agency also declines to change the verb from "compare" to "analyze" for standard 6.E.ST.1. In the justification provided recommending the change, the commentator stated that standards that use the verb "compare" are "problematic" because they "facilitate ranking of cultural facets." This is not the intent of the standard. The disciplinary clarification for this

standard focuses on the impact of the differences between the physical geography of the region, the goods that were produced and how this contributed to the specialization of each region. In addition, this comment is outside of the scope of KRS 158.196.

The agency declines to change “Sepoy Rebellion of 1857” with the “First War of Indian Independence” in the disciplinary clarification for HS.WH.CE.7. State and national documents differ in how the event is cited while many other state’s social studies documents do not mention the event. It is important to note, again, that the identified disciplinary clarifications are possible suggestions; however, they are not the only pathways and are not comprehensive to obtain mastery of the standards. As a result, local boards of education may use both terms, favor using one term over another, or explain the perspectives of naming a historical event when including this event in local curriculum. In addition, this comment is outside of the scope of KRS 158.196.

The agency further declines to add "Hindu" to "Arabic numerals" in the disciplinary clarification statement for HS.WH.CH.2. As previously stated, the identified disciplinary clarifications are possible suggestions; however, they are not the only pathways and are not comprehensive to obtain mastery of the standards. As a result, local boards of education may refer to "Hindu-Arabic numerals" when implementing the academic standards. Additionally, this comment is outside of the scope of KRS 158.196.

No amendments have been made in response to this comment.

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

The public hearing on this administrative regulation was canceled; however, two written comments were received. The Kentucky Department of Education responded to the comments and will not be amending the administrative regulation.