

NATIONAL ASSOCIATION of SCHOLARS

Office of the Colorado State Board of Education
201 East Colfax Avenue
Denver, CO 80203

May 27, 2022

Dear Colorado State Board of Education,

The National Association of Scholars (NAS) and the Civics Alliance work to ensure that every state has academic standards that promote first-rate education and protect school children from political indoctrination. We promote reform of content standards in every state, and we have been asked by Colorado citizens to comment on the Final Revision Recommendations (June 2022) for *Colorado Academic Standards: Social Studies* (CAS-SS).¹ We previously provided comment on the Draft Revision Recommendations (November 2021).² We commend you for the substantial improvement you have made to these standards. At the same time, we believe that Colorado can still improve its social studies standards very substantially—and should. If it is too late to make the proper alterations to this year’s revision of social studies standards, we strongly recommend that the Colorado State Board of Education make very great changes during its next social studies standards review, both to the substance and to the adoption process.

First let us express our appreciation for the work you have done to improve the CAS-SS—and especially the changes that address our previous critiques, and those of other individuals and organizations.

1. We recommended that you respond to Colorado’s House Bill 19-1192, “Inclusion Of American Minorities In Teaching Civil Government,” by emphasizing the successes in and contributions to America of American Indians, African Americans, Asian Americans, and Hispanic Americans. You now mention figures such as Crispus Attucks and Benjamin Banneker, and mention “contribution” in reference to “Indigenous Peoples and African Americans.” (pp. 62, 103)
2. We recommended that you address concerns about the way you had responded to Colorado’s House Bill 19-1192, “Inclusion Of American Minorities In Teaching Civil Government,” which requires teaching and content standards for history and civics to include mention of “the lesbian, gay, bisexual, and transgender individuals within these minority groups.” You have responded by removing references to “LGBTQ” from first through third grade.

¹ Colorado Academic Standards: Social Studies, Final Revision Recommendations (June 2022), Red-lined version of the proposed recommendations, https://www.cde.state.co.us/standardsandinstruction/recommendedrevisionsforsocialstudies_redlined. We comment on the red-lined version because our criticism focuses on the changes since the previous draft.

² NAS Comments on the Draft Revision Recommendations for Colorado Academic Standards: Social Studies, National Association of Scholars, <https://www.nas.org/blogs/article/nas-comments-on-the-draft-revision-recommendations-for-colorado-academic-standards-social-studies>.

3. Other individuals and organizations recommended changes which you have also addressed—to the significant improvement of these standards. These include:
 - a. your mention of Greek democracy and the Roman Republic in the Grade Seven standards (p. 89);
 - b. your note that “the United States was the only nation to fight a war to eliminate slavery” (p. 105);
 - c. your note that “Civic-minded individuals understand that all forms of discrimination based on race have been illegal for almost three generations” (p. 114);
 - d. your note that “Historical thinkers understand that societal values change over time; therefore, a period of time under study should not be judged using present day values (p. 117);
 - e. your mention of “the contribution of the United States to the defeat of fascism and totalitarianism in World War II and the contribution made to the rebuilding of Europe through the Marshall Plan” (p. 120);
 - f. your mention of “the natural rights and principles that Dr. Martin Luther King used to inform his leadership of the Civil Rights Movement” (p. 139);
 - g. your mention of the value of the founding documents of the United States (p. 141)

While we appreciate these improvements, we must also say that we do believe that CAS-SS still contains substantial room for improvement. To begin with, you did not address these recommendations that we made previously, and which we repeat:

1. Colorado’s House Bill 19-1192, “Inclusion Of American Minorities In Teaching Civil Government,” requires teaching and content standards for history and civics to include “the contributions and persecution of religious minorities.” We recommend that these standards be revised to mention religious persecution such as the Blaine Amendments, the murder of Joseph Smith, and the Masterpiece Cakeshop lawsuit.
2. Colorado’s House Bill HB20-1336, “Holocaust And Genocide Studies In Public Schools,” requires “the state board to adopt standards related to Holocaust and genocide studies.” We recommend that these standards be revised:
 - a. To refer exclusively to genocides committed by Ottoman Turkey against the Armenians, Nazi Germany against the Jews, Soviet Russia against the Ukrainians, and Communist China against the Tibetans.
 - b. To limit its definition of genocide to deliberate attempts at mass murder, and to avoid using the too-loose definition of the law, “CAUSING SERIOUS BODILY OR MENTAL HARM TO MEMBERS OF A NATIONAL, ETHNIC, RACIAL, OR RELIGIOUS GROUP.” It should also specify that “FORCIBLY TRANSFERRING CHILDREN OF A NATIONAL, ETHNIC, RACIAL, OR RELIGIOUS GROUP TO ANOTHER GROUP” refers to the Turkish seizure of Armenian children and not to schools for American Indians.
 - c. To include as a basic theme America’s proud history of opposing and preventing genocide, including:
 - i. America’s intervention in Cuba to prevent Spanish internment of Cubans in concentration camps,
 - ii. Herbert Hoover’s work to prevent the Armenians from starving,
 - iii. the work of American Quakers to rescue Jews from Nazi Europe,

- iv. America's defeat of Nazi Germany in World War II,
- v. America's use of the Nuremberg Trials to hold Nazi leaders accountable for crimes against humanity,
- vi. America's loud opposition to Soviet and Communist Chinese genocides,
- vii. America's use of military force to defend the Bosnians and the Kosovars in the 1990s, and
- viii. the growth of an American civil society, animated by humanitarian impulses, exceptionally dedicated to preventing genocides.

More generally, we note that CAS-SS contains an unfortunately large amount of politicized language and assumptions. We discuss a representative selection in **Appendix: Politicized Language and Assumptions**. We strongly recommend that the Colorado State Board of Education engage in a thorough revision to remove all such politicized language and assumptions from CAS-SS.

We are aware that we make this recommendation late in the adoption process. We therefore also recommend that the Colorado State Board of Education begin immediately to commission a new CAS-SS, and that it appoint an intellectually diverse array of staff and expert consultants for this new CAS-SS, to ensure that the new standards do not incorporate politicized language and assumptions. We believe that Colorado might profit particularly from examining the Florida civics standards and the Louisiana Social Studies Standards.³ Ultimately, Colorado's social studies standards should be replaced rather than revised.

Respectfully yours,



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President, National Association of Scholars



David Randall
Project Director, Civics Alliance

³ Proposed K-12 Civics and Government Standards, <https://www.fldoe.org/core/fileparse.php/18736/urlt/CivicsGovernment.pdf>; 2022 Louisiana Social Studies Standards, https://www.louisianabelieves.com/docs/default-source/academic-standards/02-08-2022---draft-louisiana-social-studies-standards.pdf?sfvrsn=52de6518_14.

Appendix: Politicized Language and Assumptions

American Unity: CAS-SS should thicken its references to what unites Americans—their customs, their proud history, their shared liberty and citizenship. This is particularly important in the earlier grades. Americans’ commonalities are more important than their differences; CAS-SS should make this clear.

Ideological, Polemical, Vilifying Language: CAS-SS unfortunately invokes far too frequently, as an uncontroversial given, ideological and polemical language that usually vilifies the character of American and Americans. Examples include “privileged and marginalized” (p. 32), “settler colonialism” (pp. 49, 103), “cultural genocide” (p. 62), “enslaved” [rather than “slaves”] (p. 62), and “systemic impact of racism and nativism” (p. 118). CAS-SS should remove all such language.

Global Society: CAS-SS frequently invokes “global society,” especially in reference to its Civics standards. There is no such thing as “global society” – there are various national and subnational societies, but “global society” is a fiction. Civics, in any case, should address our behavior as citizens of the United States, not of any putative “global society.” We strongly recommend that CAS-SS remove all such references.

Colorado Pride: CAS-SS’ list of events in Colorado history (p. 50) is astonishingly negative. We recommend that CAS-SS integrate, throughout its standards, events and individuals in Colorado history in which students can take pride. (E.g., the commercial and technological successes of Colorado’s mining industry, the work of its sanatoria to relieve sufferers of tuberculosis, Senator Benjamin Nighthorse Campbell.)

Iroquois Confederacy: CAS-SS lists the Iroquois Confederacy as one “of the events that led to the establishment of the United States government.” (p. 69) This invokes a recent fabrication, that the Iroquois Confederacy was a significant model for our federal model of government. Our real models were (above all) Great Britain, the Netherlands, and Rome; the Iroquois were either a trivial or a nonexistent influence. CAS-SS should eliminate this reference.

American Democracy: CAS-SS repeatedly refers to “American democracy.” The United States is a republic, not a democracy. CAS-SS should eliminate the phrase “American democracy” throughout, especially in its Civics sequences.

Living Document: CAS-SS refers to the Constitution as a “living document,” and assumes that it “benefits American democracy over time” because it is one. (p. 69) The assertion that the Constitution is a “living document” is polemical, as is the contention that it benefits the American republic that it be treated as such. This entire item should be eliminated.

Negative Examples: CAS-SS uses examples that are negative, to an extent that it distorts history. For example:

Explain how people, products, cultures, and ideas interact and are interconnected in the Western Hemisphere and how they have impacted modern times. For example: the “Great Dying” of Indigenous Peoples in the Americas and its consequences; rapid deforestation of the Amazon; anti-colonial and nationalist movements, the Columbian Exchange, and revolutions in energy. (p. 74)

The interconnection of people, products, cultures, and ideas in the Western Hemisphere might include (for example) the influential popularity of Walt Whitman, notably praised by Cuban national hero José Martí; and the role of John Lloyd Stephens in the rediscovery of Mayan civilization. Here and throughout, the attractive side of history—especially the history of Europe and the United States—is

oddly faint or absent from the standards. We strongly recommend that CAS-SS add more positive examples, so as to restore accuracy and proportion to the historical narrative they convey.

Indigenous Peoples and Power Dynamics: CAS-SS writes of “the existing conflict and power dynamics between Indigenous Peoples and those in power.” (p. 74) Benito Juarez, Evo Morales, and Charles Curtis are all examples of individuals of Indian or partly Indian descent who achieved substantial dignity and political power. The assumption of this item does not accord with the facts of history.

Facts and Opinions: CAS-SS makes a simple dichotomy between “facts and opinions” (pp. 77. 79), which excludes the entire realm of moral truths, and renders them as nothing more than an “opinion.” For example, the Declaration of Independence opens with these words: “We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness.” These are not “facts” in any strict sense—but CAS-SS’ assumptions would reduce these statements to “opinion.” CAS-SS should make room for the category of “moral truths,” which cannot be reduced to facts, and which are more than just “opinions.”

Discrimination: CAS-SS seems to believe that evil is essentially a matter of “discrimination”; for example, when it refers to “the historical roots of current issues, the Chinese Cultural Revolution, including acts of violence towards groups of people, and the discriminatory policies and events preceding those acts.” Tyranny and murder are no better for being “non-discriminatory,” and no worse for being “discriminatory.” The horrors of the Chinese Cultural Revolution doubtless did “discriminate” among its Chinese victims, but the horrors themselves are what mattered. CAS-SS should expand its moral vocabulary.

Consensus and Collaboration: CAS-SS unduly emphasizes “consensus” and “collaboration” throughout, and thereby educates students to conform to public opinion and to authority—when the most essential civic virtues and habits are individual conscience, self-reliance, and the prizing of persistent, civil, and principled dissent. CAS-SS should educate students to these virtues, not to “consensus” and “collaboration.”

Action Civics: CAS-SS has added an item, “Civic-minded individuals apply the inquiry process, collaborative problem-solving, and design thinking to create actionable solutions to civic problems.” (p. 82) CAS-SS should not encourage “action civics” in its social studies standards. We strongly recommend the removal of all language that facilitates the use of “action civics.”

All Men Are Created Equal: CAS-SS very strangely writes, “Who is included and who is excluded in the clause, ‘All men are created equal,’ which is written in the Declaration of Independence? How true was this clause at the time it was written?” *All men* means *everybody*—the phrase includes all humanity. *Created* is at the heart of America’s revolutionary principles—that since all men were *created* equal, all men *should be* equal in law and in dignity. The statement is parallel to Jean Jacques Rousseau’s, “Man is born free but everywhere is in chains.” The statement is a claim of timeless and revolutionary universality, as true then as it is now, and always will be. CAS-SS should remove this very odd item.

Capitalism, Racism, Extremism: CAS-SS asks students to “Analyze and evaluate ideas critical to the understanding of American history,” including “capitalism, racism, extremism.” (p. 119) *Capitalism* is a word of socialist polemic used to describe the free-market economy; only the enemies of economic liberty refer to *capitalism*. *Extremism* has no intellectual content, and is generally a polemic used against enemies, who are vilified because they are “extreme.” *Racism* does have intellectual substance, when referring to the self-conscious racism that reached its apogee in the later nineteenth century, but has more recently become an intellectually vague polemic, applied to people who have no racist intent,

much less an intellectual theory of racism. CAS-SS should avoid using all three terms—or, at the very least, define them carefully and strictly.

Organization: CAS-SS writes, “Why have or do some groups find it necessary to organize, i.e. unions, boycotts, peaceful protests, or strikes, as a means of civic participation?” (p. 137) CAS-SS should accompany this question with one such as “Why have or do some groups opposed unions, boycotts, peaceful protests, or strikes, as a means of civic participation?” – and provide examples that explain why Americans would in good faith oppose such tactics. (E.g., *unions infringe on economic liberty, and boycotts facilitate coercive forms of intimidation.*)

Impact: “Impact” is not a verb. CAS-SS should replace it throughout with “affect.”