

NATIONAL  
ASSOCIATION  
*of* SCHOLARS

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

January 10, 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 Draft Revision Recommendations (November 2021) for *Colorado Academic Standards: Social Studies* (LSSS). We conclude that these Draft Revision Recommendations should be substantially revised.

The NAS and the Civics Alliance generally oppose K-12 instruction that make explicit provision for identity groups. We do so both because K-12 instruction should emphasize what unites us as individual Americans who share a common dedication to liberty and because such instruction is now used overwhelmingly to facilitate radical pedagogies such as Critical Race Theory. We also oppose explicit provision for Holocaust and genocide instruction. While such laws are usually intended by legislators to instruct students about the facts of genocides such as the Holocaust and the Armenian genocide, they facilitate radical pedagogies that are used to delegitimize the United States by accusing it of genocide—and to conflate assimilation with genocide. We believe every state that adopts such laws inevitably will find they have subordinated their social studies instruction to radical pedagogy. We urge all states, including Colorado, to rescind such laws.

We also note that such laws cut against Colorado's principle of local curricular control. Colorado's state standards inevitably constrict school district autonomy, but these laws further tighten state education department control over the school districts. If Colorado wishes to preserve local school district autonomy, its legislators should rescind these laws.

That said, we know that since Colorado's legislature and governor have passed these laws, the Board of Education must determine how to put them into practice. Yet the laws delegate their execution to the Board of Education. We therefore make a series of recommendations for how the Board of Education can best work with these laws, until such time as Colorado's elected representative rescind them.

- 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 history, culture, and social contributions" of American Indians, Latinos, African Americans, and Asian Americans. We recommend that these standards be revised:
  - a. To emphasize American Indian success in and contribution to America, illustrated by mention of figures such as Ely S. Parker, Will Rogers, Charles Curtis, Jim Thorpe, and Benjamin Nighthorse Campbell.
  - b. To emphasize African American success in and contribution to America, including figures such as Benjamin Banneker, Elijah McCoy, Booker T. Washington, Biddy Mason, C. J. Walker, Jesse Owens, Ralph Bunche, Colin Powell, and Condoleezza Rice; and to consult with the education organization 1776 Unites (<https://1776unites.com>) about how best to incorporate this material into Colorado's history and civics content standards.
  - c. To emphasize Asian American success in and contribution to America, including figures such as Isamu Noguchi, Chien-Shiung Wu, Richard E. Kim, Hiram Fong, S. I. Hayakawa, Jay Kim, Sunita Williams, Nikki Haley, and Tulsi Gabbard.
  - d. To emphasize Hispanic American success in and contribution to America, including figures such as George Santayana, Luis Alvarez, Desi Arnaz, Rita Moreno, Roberto Clemente, Ellen Ochoa, Cesar Chavez, Richard Cavazos, Marco Rubio, and Ted Cruz.
- 2) 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.
- 3) 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 mention of "the lesbian, gay, bisexual, and transgender individuals within these minority groups." This mandate unfortunately requires both elementary and secondary public schools to teach matters pertaining to sexuality during social studies. Many parents prefer that these subject matters be taught by families rather than public schools, yet there is no opt-out provision in the law for social studies classes. We recommend that the Board of Education request the legislature to introduce a new bill that allows parents to choose for their children to opt out of this requirement.
- 4) 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.

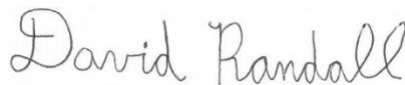
- c. To include as a basic theme America’s proud history of opposing and preventing genocide, including:
  - i. America’s intervention in Cuba to prevent Spanish internment of Cubans in concentration camps,
  - ii. Herbert Hoover’s work to prevent the Armenians from starving,
  - iii. the work of American 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.

We do not here make a line-by-line commentary of those aspects of the draft standards that work against, or fail to fulfil, our recommendations. We do, however, fully endorse the detailed catalogue of concerns presented by the Independence Institute in their public comment, and recommend that you revise the draft standards to address fully the Independence Institute’s concerns.<sup>1</sup> We also recommend to the Board of Education that they use their own initiative to revise the Draft Revision Recommendations (November 2021) for *Colorado Academic Standards: Social Studies* (LSSS) along the lines of the principles we recommend.

Respectfully yours,



Peter Wood  
President, National Association of Scholars



David Randall  
Project Director, Civics Alliance

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<sup>1</sup> Pamela J. Benigno to Social Studies Standards Review and Revisions Committee, January 5, 2022, Independence Institute, <http://pagetwo.complecolorado.com/wp-content/uploads/Independence-Institutes-Public-Comment-Regarding-Recommended-Revisions-to-Social-Studies-Standards.pdf>.