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from NATIONAL ASSOCIATION of SCHOLARS

Mississippi State Board of Education
Department of Education
P. O. Box 771
Jackson, MS 39205-0771

October 24, 2022

Dear Mississippi 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, along the lines modeled by the Civics Alliance’s *American Birthright: The Civics Alliance’s Model K-12 Social Studies Standards*,¹ and we have been asked by Mississippi citizens to comment on the Department of Education’s proposed *2022 Mississippi College and Career Readiness Standards for Social Studies (Standards)*.² We conclude that the *Standards* require substantial improvement—and that this improvement should be conducted by recruiting an independent commission to redraft new social studies standards.

The Proposed Standards: Significant Accomplishments

The proposed *Standards* possess significant accomplishments.

- The *Standards* generally provides factual content, rather than imposing “skills” instruction that is frequently counter-productive and always reduces the time available to learn factual knowledge.
- Large portions of the *Standards*, although not all, are written in unpoliticized language.

¹ *American Birthright: The Civics Alliance’s Model K-12 Social Studies Standards*, Civics Alliance, <https://civicsalliance.org/american-birthright/>.

² *2022 Mississippi College and Career Readiness Standards for Social Studies*, Summary of State Board of Education Agenda Items, September 29, 2022, Office of Chief Academic Officer, [https://www.mdek12.org/sites/default/files/documents/MBE/MBE-2022\(9\)/Tab-01-Social-Studies-item%20and%20back-up.pdf](https://www.mdek12.org/sites/default/files/documents/MBE/MBE-2022(9)/Tab-01-Social-Studies-item%20and%20back-up.pdf).

- The *Standards* frequently include factual specificity, such as the names of individuals, laws, and events.
- The *Standards* provide a good framework for European and United States history, although frequently keyed to provide a vague and hasty overview.

While our critiques of the *Standards* are substantial, we believe that the Department of Education did a great deal of good work in preparing these *Standards*.

The Proposed *Standards*: Critiques and Recommendations for Revision

The *Standards*, unfortunately, do possess significant problems. We list our critiques below and accompany each critique with a recommendation for how to revise the *Standards*.

- **Radical Dependence:** Frameworks such as the National Council for the Social Studies’ *College, Career, and Civic Life (C3) Framework for Social Studies State Standards* replace social studies pedagogy with identity politics and radical activism pedagogies such as Critical Race Theory and Action Civics.³ The Department will radicalize Mississippi’s social studies education if it depends on such national frameworks.

Recommendation: The Department should detach the *Standards* from such radicalized frameworks as the National Council for the Social Studies’ *College, Career, and Civic Life (C3) Framework for Social Studies State Standards*.

- **Distorted Civil Rights Strand Definition:** The *Standards* has added a new Civil Rights strand, with equal status with History, Civics, Economics, and Geography. The *Standards* justifies this by reference to MS Code § 37-13-193 (2013), but the statutory language does not justify the Department of Education’s revision to the *Standards*. The Code states straightforwardly that “The State Board of Education may make civil rights and human rights education a part of the K-12 curriculum of instruction in Mississippi public schools.” The Department has responded with this extraordinarily language:

Civil rights education, as understood by the writers of this framework, is defined as the mastery of content, skills and values that are learned from a focused and meaningful exploration of civil rights issues (both past and present), locally, nationally and globally. This education should lead learners to understand and appreciate issues such as social justice, power relations, diversity, mutual respect, and civic engagement. Students should acquire a working knowledge of tactics engaged by civil rights activists to achieve social change. Among these are: demonstrations, resistance, organizing, and collective action/unity. The content was incorporated as a content strand throughout the entire K-12 framework at the recommendation of the Mississippi Civil Rights Commission. (p. 12 [Strands])

The writers of the *Standards* are not justified in defining “civil rights education” as *social justice, power relations, diversity, civic engagement, demonstrations, resistance,*

³ David Randall, *Issue Brief: The C3 Framework*, National Association of Scholars, <https://www.nas.org/blogs/article/issue-brief-the-c3-framework>; Stanley Kurtz, “Consensus by Surrender,” *National Review*, June 10, 2021, <https://www.nationalreview.com/corner/consensusby-surrender/>.

organizing, and collective action/unity. This is the basic vocabulary of the radical ideology sometimes referred to as Critical Race Theory, and of the vocational training in radical activism sometimes referred to as Action Civics. The Department of Education, departing unjustifiably from statutory language and legislative intent, has smuggled into the *Standards* an intellectual framework informed by Critical Race Theory and Action Civics.

Recommendation: The Department of Education should rewrite the definition of the Civil Rights Strand to remove all radical vocabulary and pedagogy. The Department also should rewrite the *Standards* entirely to remove all distortions imposed by this radicalized definition of Civil Rights education.

Recommendation: The Department of Education should replace the Civil Rights Strand with a broader strand devoted to Liberty, defined as:

The slow development and application of the ideals and institutions of liberty, particularly those embodied in constitutional self-government. Students generally should be able to identify the ideals, institutions, and individual examples of human liberty, individualism, religious freedom, and republican self-government; assess the extent to which civilizations have fulfilled these ideals; and describe how the evolution of these ideals at different times and in different places has contributed to the formation of modern American ideals.⁴

The Liberty strand should include the development of American civil rights as a core component in the development of liberty in America and in Mississippi.

- **Documents of Liberty:** The *Standards* include a few of the documents of liberty, such as the Declaration of Independence and the Constitution, but includes no sustained attention to teaching America's documents of liberty—or, more broadly, to using primary sources in history and civics instruction.

Recommendation: The Department of Education should add a Strand of *Documents of Liberty*. The Department of Education should incorporate a series of named documents into the *Standards* and integrate coverage of them throughout the *Standards*. The series should include at least the 24 documents specified by Kentucky in KRS 158.196, which provide an excellent model for Mississippi. (**Appendix 1: The 24 Documents and Speeches Specified in KRS 158.196.**) Ideally the series also should include a broader selection of documents, keyed to the history of the intellectual background of the Founding Documents and the history of the United States. (**Appendix 4: Recommended Historical Documents.**) The Department of Education should then publish a *Documents of Liberty Reader*, and provide lesson plans and professional development, to facilitate teachers' ability to provide instruction in the Documents of Liberty.

Recommendation: The Department of Education should consider a larger integration of primary sources into their *Standards*, such as are provided by *American Birthright*.

⁴ *American Birthright*, pp. 22-23.

- **Distorted Geography Strand Definition:** The *Standards'* Geography Strand definition prompts teachers to replace factual content with empty “skills” and radical activism.

The geography strand equips students with the knowledge, skills, and perspectives of world geography to engage in ethical action regarding self, other people, other species, and Earth’s diverse cultures and natural environments. Students learn how to use geographic thinking and information to make well-reasoned decisions and to solve personal and community problems. (p. 12 [Strands])

Recommendation: The *Standards* should replace the Geography Strand with this language: “Geographers and students of geography learn how to make and understand maps, inform themselves of the natural and political contours of the world, and use this knowledge to illuminate their understanding of economics and history.”⁵ The *Standards* should be revised throughout to reinforce coverage of factual knowledge of the geography of Mississippi, the United States, and the world, and to remove all material that prompts toward radical activism.

- **Compressed World History.** The *Standards* provide a hasty survey of the history of Western Civilization and very abbreviated treatment of World History outside of Europe.

Recommendation: The *Standards* should replace the current World History sequence with a required Western Civilization sequence in middle school and high school, which provides the coherent narrative of the ideals and institutions of liberty which formed America. This Western Civilization sequence should extract the existing materials on the history of Western Civilization from the current World History instruction, and expand upon them to provide greater detail, especially of the histories of liberty, faith, science, and technology. The *Standards* would especially benefit from historical coverage of two historical sequences now entirely absent:

- i. the Renaissance rediscovery and elaboration of the concepts of liberty, individualism, republicanism, and tolerance;⁶ and
- ii. England’s history of liberty from Henry VIII (misidentified in the *Standards* as Henry VII) to John Wilkes, including the growth of parliamentary power, the English Civil War, the Glorious Revolution, legal freedoms such as *habeus corpus*, and the expansion in England of a culture and society animated by the ideals of freedom.

Recommendation: The *Standards* should create a distinct World History sequence, which provides fuller coverage of Asian, African, and Latin American history.

- **Inadequate American Cultural History.** The *Standards* provides too little material on America’s common culture. The United States History Standard (pp. 90-102) only mention American cultural history to refer to the Lost Generation and the Harlem Renaissance. (p. 95 [*US History: 1877 to the Present: USH 5.2, USH 5.8*]). Mississippi students should learn far more American cultural history, from Edgar Allan Poe to Tin Pan Alley to Georgia

⁵ The *Standards'* coverage of the Renaissance includes none of these concepts. *Standards*, p. 59.

⁶ *American Birthright*, p. 28.

O’Keefe.⁷ The *Standards’* African American Studies Standard (pp. 129-35), which includes cultural history in 7 of its 9 separate items, provides a useful model for how the United States History sequence should integrate cultural history.

Recommendation: The *Standards* should integrate coverage of the history of America’s common culture throughout its United States History sequence.

- **Incorrect Usage of “Democracy”:** The *Standards* consistently refer to America as a *democracy* rather than a republic. This usage was challenged in the previous public comments (“Teach that America is a Constitutional Republic, not a Democracy.” [3.CI.1, USG. 1]), but rejected by the Department, on the grounds that “While the United States is a republic where representatives are elected to make laws on behalf of constituents, it is commonly referred to as a democracy.” (USG 1). The Department misstated the case: the United States is *polemically* referred to as a democracy, and it is usage with important intellectual and political consequences—not least because America was established as a republic with limited government and separation of powers precisely to prevent the majoritarian tyranny that the Founding Fathers feared would accompany pure democracy. The *Standards* itself, for example, asks students to “Identify principals [*sic*] of democracy within the Declaration of Independence” (p. 34 [3.CR.1]), without asking them to identify principles of *liberty*. The *Standards* likewise directs students to “Examine the influence of democratic values on the lives of citizens” (p. 32 [3.CI.1]), rather than *American values* or *values of liberty*. The *Standards’* definition of America as a *democracy* rather than a republic underwrites the abandonment of *American values* and *liberty* throughout the *Standards*.

Recommendation: The *Standards* should define America as a constitutional republic, and they should add or substitute *liberty* and *American values* wherever they refer to American *democracy* or *democratic values*.

- **Distorted Mississippi Studies.** Several public comments asked for mention of “MS State Constitution, Davis Secession, James K. Vardaman, Sovereignty Commission, Brown, Plessy” (*U.S. History* 7C.7, 7C.12, 7c.13). The Department responded: “No change needed. Content covered in Mississippi Studies.” While Mississippi Studies does mention successive Mississippi Constitutions, it mentions neither Jefferson Davis nor James K. Vardaman by name, although it does mention individuals for virtually every other period of Mississippi history (*Mississippi Studies*, pp. 77-81). This absence substantially weakens Mississippi Studies.

Recommendation: The *Standards* will not endorse slavery, secession, or segregation if it mentions these figures by name, or those of other famous Mississippians associated with these causes. The Department of Education should revise the Mississippi Studies Standards to include prominent Mississippians, regardless of their political beliefs.

- **Distorted Minority Studies:** Minority Studies includes several absences and distortions.

⁷ Cf. the extended coverage of American cultural history in *American Birthright: Grade 11, United States History*, Item 15 (pp. 124-25), Item 38 (p. 130), Item 48 (p. 132), Item 62J (p. 136), Item 63 (p. 136), Item 77 (p. 140).

- *Polemical Despair*: Minority Studies (pp. 165-69) mentions *minority groups, marginalization, plight, discrimination, prejudice, scapegoating, inequalities, resistance, systemic inequality, microaggressions, cultural appropriation, and discrimination*. At least three of these concepts are polemical falsehoods (*systemic inequality, microaggressions, cultural appropriation*), and the rest are severely unbalanced in the historical portrait they present, since they do not mention *minority individuals, assimilation, cooperation, resilience, success, fair treatment, equality, accommodation, or common American identity*.
- *Polemical Absences*: Minority Studies does not mention notable American minorities, including Catholics, Mormons, Quakers, Amish, Cajuns, Irish, Germans, Italians, and Poles. The story of these minorities, and the extent of their assimilation into a common American identity, ought to be part of Mississippi's Minority Studies.
- *Holocaust*: The Minority Studies course oddly refers to the Holocaust without naming the victims: "Illustrate the major events, minority groups, and people associated with the Holocaust and its global impact." (p. 168 [MIN.7]) The Minority Studies should explicitly mention at least Jews, Gypsies, homosexuals, and the disabled.

Recommendation: The Department should redraft the Minority Studies sequence entirely, and produce a version shorn of polemical despair and polemical absences.

- **Miscellaneous Miscues**. The *Standards* makes several smaller mistakes, which should be corrected.
 - **History Strand**. The *Standards* directs students to "investigate how the past shapes the present, how people and events have changed society through time, and how localized changes can impact the world power structure." (p. 12 [Strands]) The *Standards* inappropriately assume that *societies* and *power structures* are the foundation of human history, when it is *polities, faiths, and liberties*. The Department should redraft the History Strand accordingly, and redraft the *Standards* to match this change.
 - **Slaves/Enslaved**: The *Standards* substitutes the polemical term *enslaved* for *slaves*. Polemical jargon is inappropriate for *Standards*—and this jargon obscures a vital historical distinction between African Americans who were enslaved and those who were born slaves (or free men), between African Americans largely products of African culture and those increasingly partaking of and contributing to the American cultural complex of Christianity, ideals of liberty, and Anglo-American culture. The *Standards* should use the terms *enslaved* and *slaves* correctly.
 - **African American Christianity**: The *Standards* does not discuss African American Christianity explicitly, although they do mention Negro Spirituals (p. 73 [US History: Exploration to 1877 8.7]) and religious institutions such as the "AME Church in Philadelphia and other 'Invisible Churches'" (p. 131 [AAS.3]). The *Standards* should mention the Christianization of African-American slaves and free men and the nature and development of African-American Christianity

- **Communism:** The *Standards* does not define Communist ideas, or their effect. The *Standards* directs students to learn how “Nazi ideas about race and nation led to the dehumanization and genocide of Jews in the Holocaust” (p. 87 [*World History* WH 9.2]); they also should direct students to learn how (for example) “Communist ideas about class struggle and the dictatorship of the proletariat led to the dehumanization of “class enemies” and genocide of the Ukrainians in the Holodomor.”
- **Explaining Away Conservatism:** A public comment on *United State History* USH 10.1 astutely notes that “Revisions ask students to evaluate the conservative movement as a response to ‘social, economic, and environmental’ issues rather than appraising the issues.” The Department erred when it made no change in response to this comment. The *Standards* does not ask students to evaluate the Civil Rights movement, the women’s movement, or the environmental movement as responses to other developments. (p. 99 [*United States History* USH 9.3-5]) The *Standards* should treat the conservative movement in the same manner.
- **Economic Rights:** The *Standards* assumes the existence of *economic rights* in the United States Government course: “Identify the importance of economic rights and explain how they are secured.” (USG 8.7) *Economic rights* are a staple of progressive polemic, but they should not be assumed to exist. Nor should they be incorporated into the United States Government course, since our civil rights are political in nature, not economic. The Department should remove this item from the *Standards*.
- **United Nations’ Universal Declaration of Human Rights:** In Grade 6, Standard 6.14 (“Describe how civil rights and citizenship roles vary based on the culture and government of various nation-states.”) includes the objective “Compare and contrast the Declaration of Independence, the Constitution, and the Amendments with the United Nations’ Universal Declaration of Human Rights.” (p. 52 [6.14.4]) The United Nations is not a nation-state, and human rights are not civil rights. The Department should remove this item from the *Standards*.
- **Impact:** The *Standards* uses *impact* throughout, when they should use *affect* or *effect*. The Department should replace *impact* throughout.
- **Revision Transparency:** The Department of Education helpfully provided a redlined version of the *Standards* that transparently revealed the changes between the 2021 draft *Standards* and the 2022 proposed *Standards*. However, it did not provide a similar redlined version to reveal the changes from the 2018 *Standards* to the 2022 proposed *Standards*. The Department should provide redlined versions that provide such information as part of the future standards revision process.

Strategic Recommendations

We have provided the above recommendations for revision to the Department of Education, but we do not believe that social studies standards revision can or should be undertaken entirely by the Department. We make three strategic recommendations to the Department.

- **Independent Commission.** The Department received a great many thoughtful comments—which its personnel largely ignored, even when they were sensible. The Department evinced an attitude that was unresponsive to the Mississippi public, to which

it should be accountable. We therefore recommend that the Department ask Mississippi's policymakers to appoint an independent commission to redraft Mississippi's social studies standards. Effective revision of the *Standards* must be carried out by a commission independent of the Department personnel.

- **Licensure Requirements and Professional Development:** The Department of Education also should update its licensure requirements and professional development to ensure that its teachers are equipped to teach curriculum that aligns with these *Standards* new emphasis in historical documents.
- **Statutory Reform:** The Department of Education should ask state policymakers to enact laws that ensure proper social instruction in all Mississippi public K-12 schools.⁸

Conclusion

The Mississippi Department of Education's proposed *Standards* possess significant virtues, but they also possess substantial shortcomings. The Department should revise the proposed *Standards* in detail as we have recommended in this public comment. We suggest that the Department examine our model *American Birthright* social studies standards, but we also suggest that Kentucky examine the fine alternate models of Louisiana and South Dakota. The Department also should request Mississippi policymakers to appoint an independent commission to redraft new social studies standards.

Respectfully yours,



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⁸ Civics Alliance: Social Studies Curriculum Act, <https://civicsalliance.org/model-palm-card/social-studies-curriculum-act/>; Civics Course Act, <https://civicsalliance.org/model-k-12-civics-code/civics-course-act/>; United States History Act, <https://civicsalliance.org/model-k-12-civics-code/united-states-history-act/>; Western Civilization Act, <https://civicsalliance.org/model-k-12-civics-code/western-civilization-act/>; Historical Documents Act, <https://civicsalliance.org/model-k-12-civics-code/historical-documents-act/>; and more broadly, the Model K-12 Civics Code, <https://civicsalliance.org/model-k-12-civics-code/>.

Appendix 1: The 24 Documents and Speeches Specified in KRS 158.196

1. The Mayflower Compact;
2. The Declaration of Independence;
3. The Constitution of the United States;
4. The Federalist No. 1 (Alexander Hamilton);
5. The Federalist Nos. 10 and 51 (James Madison);
6. The June 8, 1789, speech on amendments to the Constitution of the United States by James Madison;
7. The first ten (10) amendments to the Constitution of the United States, also known as the Bill of Rights;
8. The 1796 Farewell Address by George Washington;
9. The United States Supreme Court opinion in *Marbury v. Madison*, 5 U.S. 137 (1803);
10. The Monroe Doctrine by James Monroe;
11. What to the Slave is the Fourth of July? speech by Frederick Douglass;
12. The United States Supreme Court opinion in *Dred Scott v. Sandford*, 60 U.S. 393 (1857);
13. Final Emancipation Proclamation by Abraham Lincoln;
14. The Gettysburg Address by Abraham Lincoln;
15. Declaration of Rights of the Women of the United States by Susan B. Anthony, Matilda Joslyn Gage, and Elizabeth Cady Stanton;
16. The September 18, 1895, Atlanta Exposition Address by Booker T. Washington;
17. Of Booker T. Washington and Others by W.E.B. Du Bois;
18. The United States Supreme Court opinion in *Plessy v. Ferguson*, 163 U.S. 537 (1896);
19. The August 31, 1910, New Nationalism speech by Theodore Roosevelt;
20. The January 11, 1944, State of the Union Address by Franklin D. Roosevelt;
21. The United States Supreme Court opinions in *Brown v. Board of Education of Topeka*, 347 U.S. 483 (1954) and *Brown v. Board of Education of Topeka*, 349 U.S. 294 (1955);
22. Letter from Birmingham Jail by Martin Luther King, Jr.;
23. The August 28, 1963, I Have a Dream speech by Martin Luther King, Jr.; and
24. A Time for Choosing by Ronald Reagan.

Appendix 2: Recommended Historical Documents

Founding Documents, Intellectual Background

Magna Carta (1215)
Petition of Right (1628)
English Bill of Rights (1689)
Toleration Act (1689)
John Locke, *Second Treatise of Civil Government* (1690)
Montesquieu, *The Spirit of Laws* (1748)

United States Documents

Articles, Laws, and Orders of Virginia (1610)
Fundamental Orders of Connecticut (1639)
Massachusetts Body of Liberties (1641)
Pennsylvania Charter of Privileges (1701),
John Woolman, *Some Considerations on the Keeping of Negroes* (1754)
John Adams, *Braintree Resolves* (1765)
Common Sense (1776)
Virginia Declaration of Rights (1776)
Massachusetts Constitution and Declaration of Rights (1780)
Virginia Statute for Religious Freedom (1786)
Northwest Ordinance (1787)
Anti-Federalist Papers: Brutus No. 1 (1787)
The Federal Farmer, *Letter III* (1787)
The Federalist Nos. 9 (Alexander Hamilton), 39 (James Madison), and 78 (Alexander Hamilton) (1787-88)
Benjamin Franklin, *The Autobiography of Benjamin Franklin* (1791)
Thomas Jefferson, First Inaugural Address (1801)
Alexis de Tocqueville, *Democracy in America, Volume I* (1835) and *Volume II* (1839)

Abraham Lincoln, “Speech on the Dred Scott Decision” (1857)
Abraham Lincoln, “House Divided” speech (1858)
Abraham Lincoln, Second Inaugural Address (1865)
Niagara Movement Declaration of Principles (1905)
Theodore Roosevelt, “The Man with the Muck-rake,” speech (1906)
Woodrow Wilson, “Peace Without Victory,” speech (1917)
Schenck v. United States (1919)
Justice Oliver Wendell Holmes’ dissenting opinion in the case of *Abrams v. United States* (1919)
Herbert Hoover, *Rugged Individualism* (1928)
Franklin Delano Roosevelt, First Inaugural Address (1933)
Franklin Delano Roosevelt, “Four Freedoms” speech (1941)
Justice Robert M. Jackson’s opinion for the Supreme Court in *West Virginia State Board of Education v. Barnette* (1943)
Learned Hand, *The Spirit of Liberty* (1944)
The Truman Doctrine (1947)
George Kennan, “The Sources of Soviet Conduct” (1947)
John F. Kennedy, Inaugural Address (1961)
Ronald Reagan, Berlin Wall Speech (1987)
Ronald Reagan, Speech at Moscow State University (1988)
George W. Bush, Second Inaugural Address (2005)
District of Columbia v. Heller (2008)
Dobbs v. Jackson Women's Health Organization (2022)