March 7, 2022

Dear Deputy Director Johnson,

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 Tennessee citizens to comment on the draft *Tennessee Social Studies Standards*.\(^2\) (Hereafter *Standards.*) We conclude that Tennessee’s *Standards* are far better than those of states such as Minnesota and Rhode Island,\(^3\) and that the draft *Standards* provide a solid basis for social studies instruction, although they would still benefit from systematic revision.

\(^1\) *American Birthright: The Civics Alliance’s Model K-12 Social Studies Standards*, Civics Alliance, [https://civicsalliance.org/american-birthright/](https://civicsalliance.org/american-birthright/).


Solid Basis for Social Studies Instruction

Tennessee’s Standards include large amounts of factual content throughout, largely unpolticized, with substantial Tennessee content, which provide clear expectations for teachers and students. We approve of many of these choices. Where we disagree in detail about the choices and omissions, we would suggest revision along the lines of American Birthright—above all, to add even more rigor and factual content. Tennessee’s draft provides a good start for systematic revision of its Standards—but does not provide it an excuse not to engage in that systematic revision.

Shortcomings and Recommendations

Unclear Format: The Standards embed factual content within an unclear format. The Standards include 6 pages in the Introduction on “How to Read the Standards,” “Standards Progression and Course Descriptions,” “Examples Found Within the Standards,” and “Content Strands.” While the Standards themselves are relatively clear despite the overly complex format, teachers still will have difficulty comprehending the Standards, as will parents and policymakers, who should be able to hold teachers accountable for teaching according to the standards. Standards should be simple enough that they do not need a section explaining how they should be read.

Recommendation: Revise the Standards format to be so clear that they can be read without explanation.

Misguided Skills and Inquiry Emphasis: The Standards echoes the latest fashion in education schools, “inquiry-based learning,” which facilitates an unfortunate tendency to include tendentious “questions” that imply answers that fit radical polemic. The Introduction includes 7 pages on “Social Studies Practices,” “Interconnectedness of the Standards, Content Strands, and Social Studies Practices” and “Social Studies Literacy,” as well as repetitive material on “Social Studies Practices” within each individual Standard. These Skills and Inquiry emphases not only render the Standards bulky and unreadable but also will steer teachers and school districts to waste scarce classroom hours teaching mandated skills and “inquiry-based learning” rather than in teaching factual content.

To the extent that the Standards emphasis on “inquiry-based learning” derives from the College, Career, and Civic Life (C3) Framework for Social Studies State Standards, it also aligns Tennessee’s standards with the C3 Framework’s radical pedagogy. We have critiqued the C3 Framework extensively elsewhere, and conclude:

The C3 Framework substitutes process for content, yokes social studies instruction to the failed Common Core curriculum, politicizes social studies instructions, and subordinates all of social studies instruction to action civics, which replaces civics education with vocational training for left-wing community organizing.

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Tennessee should not include any alignment with the *C3 Framework’s* preferred pedagogy of inquiry-based learning.

**Recommendation:** Remove all Skills and Inquiry from the *Standards*, and explicitly detach Tennessee’s *Standards* from the *C3 Framework*.

**Vague Reading and Writing Expectations.** Tennessee’s *Standards* should have firm and clear expectations, which parents may use to hold their schools and their teachers accountable. Social studies instruction should include: *Reading Expectations*, which build toward students capable by graduation from high school of reading an intellectually and stylistically sophisticated 200-page history book, which demonstrates that they are prepared for an undergraduate history course; and *Writing Expectations*, which build toward students capable by graduation from high school of writing an intellectually and stylistically sophisticated 10-page history paper, which demonstrates that they are prepared for an undergraduate history course.

**Recommendation:** Provide firm and clear reading and writing expectations, which parents may use to hold their schools and their teachers accountable.

**Misguided Commitment to “Action Civics”:** Tennessee statute requires the *Standards* to include several “project-based civics assessments”—which too frequently subordinate civics education to “action civics,” also known as “protest civics,” which substitutes vocational training in progressive activism for classroom civics education. The *Standards* also include the repeated, politicizable skill, “Devise new outcomes or solutions.”

**Recommendation:** Request the Tennessee legislature to rescind the “project-based civics assessments” from T.C.A. § 49-6-1028.

**Politicization:** The *Standards* includes politicized instruction and vocabulary. Evanescent radical vocabulary includes *enslaved* (passim), *equity* (E.08, as a goal of economic policy) *European American* (passim), *Indigenous Peoples* (passim), and *multiculturalism* (1.02). The Psychology Standard includes an entire section of radical ideology, “Sociocultural Diversity,” (P.44-48) while the Sociology Standard includes a politicizable section on “Stratification and Social Inequality” (S.40-43). Consider also the standard, “Contrast how the principles set forth in the Declaration of Independence clashed with treatment of different groups, including women, enslaved persons, and American Indians” (4.23), which articulates a Critical Race Theory presumption about how to treat America’s foundational principles—and does not include, as a counterpart, a standard on how the principles set forth in the Declaration of Independence came to be embodied successfully in

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American culture, society, and political practice. Likewise, “Explain how enslaved persons resisted bondage in their daily lives, including passive and overt resistance and Nat Turner’s Rebellion,” (8.44) articulates the radical emphasis on resistance, without such counterparts as cooperation and accommodation, which are universal aspects of human character. The Standards contain enough politicized language and instruction to give pause—and require revision.

**Recommendation:** Remove all politicized language and instruction from the Standards, with a particular focus on Geography, Psychology, Sociology, and evanescent radical jargon.

**Absent Core Disciplinary Concepts:** Liberty, Documents of Liberty, and Common American Culture: Tennessee does not include Liberty, Documents of Liberty,9 or Common American Culture10 as Content Strands. These need to be included explicitly as Content Strands, to ensure proper organizing principles for social studies instruction—and to ensure that social studies instruction does not casually cast these aside. Second-grade students, for example learn to “Describe principles of democracy in America, including equality, fair treatment for all, and respect for the property of others.” (2.24) – and they are never taught that liberty is one of America’s foundational principles. Liberty and freedom are similarly absent throughout the Standards, as, by and large, is America’s common culture.

**Recommendation:** Add Content Strands of Liberty, Documents of Liberty, and Common American Culture to the Standards, and revise it accordingly throughout.

**World History Substituted for Western Civilization:** The Standards cannot provide a coherent presentation of Western Civilization’s ideals and institutions of liberty, which Tennessee students need if they are to understand the Declaration of Independence and the Constitution, because they substitute a disjointed and vague World History course for dedicated instruction in the history of Western Civilization.

**Recommendation:** Tennessee should revise the Standards to contain discrete, sustained coverage of Western Civilization throughout K-12 instruction, to provide students the coherent narrative of the ideals and institutions of liberty contained within the histories of the ancient Middle East, Israel, Greece, Rome, Medieval Christendom, the Renaissance, the Scientific Revolution, the Enlightenment, and medieval and early modern England. This instruction should include a dedicated and required class in high school.

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10 For the history of American culture, see *American Birthright*, pp. 124-25, 130, 132, 136-37, 141 [Grade 11: United States History: Items 15, 39, 49, 63-64, 78].
Recommendation: Tennessee should revise the Standards to contain discrete coverage of World History, either as an elective or as a required course, to introduce students to the histories of Asia, Africa, and Latin America.

Distorted Geography: The Standards’ Geography provides cues throughout for radical activism; e.g., “Describe the challenges of urban areas (e.g., access to public services, affordability of housing, discrimination, gentrification, overpopulation, pollution, sprawl, transportation, zones of abandonment, and food deserts).” (WG.46)

Recommendation: Revise Geography to remove all cues for radical activism and to focus on map content knowledge.

Distorted Economics: The Standards’ Economics instruction uses the phrase wants and needs. This distinction, foreign to economic theory, allows activists to smuggle in a polemic for an expansive welfare state in the word needs, to justify government intervention in every aspect of the economic realm denominated as needs.

Recommendation: Remove all use of needs in reference to economics instruction.

“Media Literacy” Distortions: The Standards includes media literacy instruction, which frequently is used to forward default credulity in the radical polemic embedded in the establishment media, and to forward default skepticism in news that contradicts radical polemic.

Recommendation: Remove all media literacy instruction from the Standards.

Semiliterate Prose: The Standards uses “impact” throughout, when it should use “affect” or “effect.” The authors of the Standards reduce confidence in their command of history when they demonstrate shaky command of the English language.

Recommendation: Remove all uses of the word “impact,” and employ a copy editor to review the Standards for correct English prose.

Recommendations: Accompanying Measures

Social studies standards reform should work in tandem with broader support for education reform. We urge Tennessee to undertake several broader measures:

Licensure Requirements, Professional Development and Textbooks: We suggest that Tennessee policymakers work to update the state’s licensure requirements, professional development, and textbook standards to align with the revisions we propose for the Standards.

Dual Enrollment Course Standards Revision: We suggest that Tennessee policymakers enact laws that ensure that dual enrollment social studies courses (dual course, dual credit, concurrent enrollment) align with the revisions we propose for the Standards.

Statutory Reform: We suggest that Tennessee policymakers enact laws that provide statutory underpinnings for the revisions we propose for the Standards.  

Conclusion

Tennessee has done a good work in producing these draft Standards—but it still should engage in systematic reform of the Standards, to address the criticisms we have made. We urge you to engage in this systematic reform. The draft Standards are acceptable, but Tennessee’s citizens deserve excellent social studies standards.

Respectfully yours,

Peter Wood
President, National Association of Scholars

David Randall
Executive Director, Civics Alliance

[Links to acts and codes]

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