

November 27, 2023

Office of Administrative Hearings Administrative Law
Judge Eric Lipman, Presiding Judge OAH Docket No. 8-9005-37919
Minnesota Rules: Chapter 3501 Revisor ID: R-4733

Comments on Proposed Amendment to Rules Governing K-12 Academic Standards in Social Studies

Honorable Judge Lipman:

I am an educational researcher and Managing Director of Education at FAIR, a non-profit organization dedicated to advancing civil liberties for all. From 2004 - 2022, I was faculty in the College of Education at Seattle University, where I trained pre-service teachers in literacy methods. My research, which is focused on building literacy with at-risk and incarcerated teens, has been published in the *Journal of Adolescent and Adult Literacy*, *Children's Literature in Education*, *PNLA Quarterly*, and other scholarly outlets, and I am the winner of the 2015 Bonnie Campbell Hill Washington State Literacy Leader Award for my work as a teacher leader. For fifteen years, I volunteered as a writing instructor for incarcerated teens and adults. I am writing to urge you to reject the Proposed Permanent Rules Relating to K-12 Academic Standards in Social Studies.

In the proposed permanent rules, I see an alarming parallel to costly mistakes made in the past several decades in the field of literacy instruction in the United States. You may be aware that one in three American fourth graders read below a basic level, and the 2023 National Assessment of Educational Progress indicates an all-time low in literacy scores. Flawed literacy instruction has been a driving factor behind the nationwide literacy decline, and the field of literacy education has experienced major disruption since 2022 due to wide recognition of these errors in theory and methods, with fifteen states passing laws to change their approach to reading instruction and seven more considering such legislation. In the past several decades, K-12 literacy instructional methods in the United States have largely followed the “three cueing” or balanced literacy model, **which focuses on process or skills over content**. As documented in the groundbreaking podcast *Sold a Story* (summarized here), this model has contributed to reading failure, whereas effective literacy instructional methods include systematic instruction in phonics, vocabulary instruction, and an emphasis on helping students acquire the background knowledge required for reading comprehension. **Students gain critical background knowledge through social studies and science instruction**. Without clear, objective, measurable social studies standards that describe content to be learned, students may not acquire the background knowledge necessary for reading comprehension. While some students may access this knowledge at home or through enrichment activities, our most at-risk students are less likely to have this access and exposure, contributing to what has been called the “achievement” or “opportunity” gap—and some researchers now call the “knowledge gap.” (For a concise

summary of these findings, please see [American Educator, “Building Knowledge: What an Elementary Curriculum Should Do,” Summer 2020.](#))

In *The Knowledge Gap*, awarded the Nautilus Book Award silver medal in Social Sciences and Education (see [overview video](#)), educational researcher Natalie Wexler writes, “As for comprehension, the most important factor in determining whether readers can understand a text is how much relevant vocabulary or background knowledge they have... While a limited amount of instruction in comprehension strategies can help some students derive meaning from text, that’s only possible if they have enough knowledge to make sense of the text in the first place” (p. 47, 2019). Wexler’s work is substantiated by a robust body of research, including this [2023 meta-analysis](#) of fifty-five studies, which concludes that background knowledge is essential to reading comprehension. With such a wide and longstanding body of research demonstrating the importance of building knowledge for comprehension, why have so many teachers and curricula emphasized process or skills over content? Wexler describes (and I can attest to) the proliferation of fashionable but poorly supported pedagogical theories in colleges of education. Here, Wexler identifies the root of the problem: “One fundamental pedagogical precept that most budding teachers do learn is that they should spend as little time as possible imparting factual information. The prevailing theory is that students must engage in constructing their own knowledge rather than memorizing facts that will only bore them and that they don’t truly understand” (p. 49, 2019). The positioning of “constructing knowledge” in opposition to “learning facts” is in actuality a misreading of a nuanced developmental learning theory called constructivism, but, as Wexler states, this misreading is prevalent and has had a tremendous impact on curriculum and instruction.

Throughout the Minnesota Department of Education’s Statement of Need and Reasonableness (SONAR), there is language which closely parallels this flawed reasoning that has compromised decades of literacy instruction. See, for example, this excerpt from page 12 of the SONAR:

In all of the disciplines of social studies, research in at least the last two decades has reflected an effort to move K–12 classrooms away from rote memorization and an understanding of social studies as a set of discrete facts that can be “known” towards the unique disciplinary practices of each of the social sciences, centered on student inquiry... By incorporating the Inquiry Arc into civics classrooms, civics education shifts from “rote memorization of knowledge about the branches of government into participatory inquiry in which students pursue scholarly readings and remedies to self-identified community issues.”

See also this statement on page 64 of the SONAR:

Focus on Conceptual Understanding

Social studies is far more than a mere march through facts, where student learning stops at the level of recalling names, dates, and other information they may soon forget.

Specific content knowledge is important and serves as a foundation for conceptual understandings. Social studies learning can be designed around meaningful conceptual understandings related to ideas such as human-environment interaction, economic decision-making, or revolution. The proposed 2021 K–12 Academic Standards in Social Studies include these conceptual understandings as an integral part of the overall framework.

As was commonplace in literacy education, the language above from the SONAR uses “rote memorization” and “facts” pejoratively to argue for replacement of content knowledge with a heavy focus on process or abstract skills. I urge you to reject this flawed reasoning which will only further disadvantage our most at-risk students, who may lack opportunities to acquire social studies background knowledge outside of school contexts. Students need content knowledge, which sometimes does include memorization, in order to build the cognitive frameworks to understand their social, national, and political contexts and eventually take self-determined action (rather than teacher-directed action). Content knowledge need not be delivered or acquired in a “rote” manner (though sometimes rote learning can be helpful), but may be pursued through a variety of pedagogical methods that may include cooperative and inquiry based learning. In other words, there is a false dichotomy in the notion that “facts” and “inquiry” are at odds. Though there is in the SONAR a brief acknowledgment of the importance of content knowledge, the actual revisions to the standards and benchmarks remove a startling number of content objectives.

To illustrate the pervasive removal of content from the standards, I’d like to share an example of the changes to the Geography Strand by comparing 2011 standards to the proposed new standards. I have also reviewed the benchmarks, which are not included in the rule-making process, and find them similarly lacking in clarity, coherence, and measurability. These issues are consistent throughout the other strands/standards.

The Geography standards have been reduced in number from nine standards in 2011 to five standards in the Proposed Rule Change, itself an indicator of reduced content. In the Proposed Rule Change, the 2011 Geography Standards 3 and 4 are combined into one standard.

(2011) Standard 3: Places have physical characteristics (such as climate, topography and vegetation) and human characteristics (such as culture, population, political and economic systems).

(2011) Standard 4: People construct regions to identify, organize and interpret areas of the earth’s surface, which simplifies the earth’s complexity.

Standards 3 and 4 (2011) are combined into Standard 14 in the Proposed Rule Change:

Standard 14: Places and Regions: The student will describe places and regions, explaining how they are influenced by power structures.

This change replaces concrete and objective terms with abstract, vague language that will present a challenge to interpretation and lesson planning. To further illustrate the reduction in content, please see the change in Kindergarten Benchmarks for the above standard(s).

(2011) Kindergarten Benchmark for Standard 3:

0.3.2.3.1: Identify the physical and human characteristics of places, including real and imagined places. For example: Physical characteristics—landforms (Rocky Mountains, Mount Everest), ecosystems (forest), bodies of water (Hudson Bay, Indian Ocean, Amazon River), soil, vegetation, weather and climate. Human characteristics—structures (Great Wall of China, Eiffel Tower), bridges (Golden Gate Bridge), canals (Erie Canal), cities, political boundaries, population distribution, settlement patterns, language, ethnicity, nationality, religious beliefs.

Kindergarten Benchmark for Standard 14 under the Proposed Rule Change:

K.3.14.1: Identify physical and human characteristics and find examples in the local community and within stories.

These are just two examples of the pervasive removal of content and concrete, actionable language from the standards.

Moreover, the SONAR states in its “Statement of Need and Reasonableness for Repeal of Existing Social Studies Standards” that “Ultimately, the department, in conjunction with the committee, chose to recommend adopting new standards and repealing the existing Minnesota Rules governing K–12 academic standards in social sciences in their entirety. This decision was made to better align with current research, such as the nationally recognized C3 Framework.”

The C3 Standards clearly state the **importance of state standards in determining content**, as seen on page 14 of the C3 Standards in the subsection *Here Is What Is Not Covered in the C3 Framework*:

The C3 Framework is intended to serve as a resource for states to consider as they upgrade their existing state social studies standards. The Framework provides guidance on the key concepts and skills students should develop through a robust social studies program of study, but intentionally does not address all of the elements states will need to consider in developing and upgrading standards. There are three main areas **not** addressed by the framework: • Content Necessary for a Rigorous Social Studies Program. The C3 Framework focuses on the concepts that underlie a rich program of social studies education. The foundational concepts in Dimension 2 outline the scope of the disciplinary knowledge and tools associated with civics, economics, geography, and history. References are made to a range of ideas, such as the U.S. Constitution, economic scarcity,

geographical modeling, and chronological sequences. **However, the particulars of curriculum and instructional content—such as how a bill becomes a law or the difference between a map and a globe—are important decisions each state needs to make in the development of local social studies standards.**

If, indeed, the rewriting of the Social Studies Standards was made in part to align with the C-3 Framework, then it is important to heed the Framework’s language regarding its uses and limitations.

Minnesota state law requires that standards be “clear, concise, objective, measurable, and grade-level appropriate” (Minn. Stat., section 120B.021, subd. 2). As a teacher trainer of twenty years, I would like to testify that the proposed standards do not meet these criteria, and I would like to emphasize the crucial connection between clear, measurable, grade-level appropriate state standards and effective lesson planning. In teacher training programs, teachers learn to anchor lesson plan objectives, learning targets, and assessment plans to state standards. Overly abstract language in the standards is confusing to teachers and places on them a burden of interpretation that results in wide variations in content and instruction; uneven assessment practices; and lack of coherence and continuity across grade levels and/or districts. Outsourcing content concerns to similarly vague and abstract benchmarks does not provide the needed clarity and also circumvents public voice in the rule-making process. For lesson planning purposes, it is virtually impossible to extrapolate the needed instructional anchor from such language as is pervasive throughout the proposed new standards. The lack of specified content in the new standards and benchmarks will greatly complicate lesson planning *and* further exacerbate the literacy crisis in our country by increasing the “knowledge gap” which hinders so many students’ reading comprehension.

Thank you very much for considering these comments. Again, for the sake of Minnesota K-12 students’ proficiency in both social studies and literacy, I urge you to reject this proposed rule change in its entirety.

Sincerely,

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Foundation Against Intolerance & Racism (FAIR)