

NATIONAL
ASSOCIATION
of SCHOLARS

Civics
Alliance

from NATIONAL ASSOCIATION of SCHOLARS

Committee on Education and Cultural Affairs
c/o Legislative Information Office
100 State House Station
Augusta, ME 04333

February 7, 2024

Dear Committee on Education and Cultural Affairs,

The National Association of Scholars (NAS) and the Civics Alliance have been asked by Maine citizens to comment on L.D. 2182, which would enact into law the Maine Department of Education's proposed *Maine 2023 Draft Social Studies Standards* (hereafter ***Draft Standards***).¹ We 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*,²

We conclude that the *Draft Standards* does a great disservice to the citizens, students, and teachers of Maine. The *Draft Standards* possesses virtually no content knowledge. It consists largely of education school jargon, heavily inflected by radical polemic. State statutes that require mention of African American and American Indian history have been distorted to include rote mention of African Americans and American Indians throughout the standards. Worse, the state requirement to include genocide education focused upon the Holocaust has been turned into a blood libel of American and Mainers, by applying "genocide" to their history. We urge the members of the Committee on Education and Cultural Affairs, and Maine legislators in general, to vote against L. D. 2182. The Maine Education Department should rescind the *Draft Standards* and replace it with a content-rich, unpoliticized social studies standard that replaces inculcation of radical polemic with teaching the history of America and Maine.

¹ *Maine 2023 Draft Social Studies*, PUBLIC COMMENT: Rule Chapter 132: Learning Results: Parameters for Essential Education; Science and Social Studies Standards, Maine Department of Education, <https://www.maine.gov/doe/sites/maine.gov/doe/files/inline-files/2023%20revised%20standards%20DRAFT%20Social%20Studies.%20Leg.%20Format.Locked.docx>.

² *American Birthright: The Civics Alliance's Model K-12 Social Studies Standards*, Civics Alliance, <https://civicsalliance.org/american-birthright/>.

Racially Discriminatory Drafting Process

The *Draft Standards* states that “The Maine Social Studies Standards were created through a collaborative effort between educators, stakeholders, advisors from the Wabanaki Nations, African Americans throughout the state, and The Holocaust and Human Rights Center of Maine.” [Introduction] The reference to “the Wabanaki Nations” and “African Americans throughout the state” indicates that Maine’s Education Department has engaged in illegal race discrimination in creating its *Draft Standards*. Maine mandates instruction in African American and American Indian history³ because it is part of the history of all Maine citizens, and for the benefit of all Maine citizens. Maine’s legislature did not license race discrimination, but Maine’s Education Department impermissibly has used race categories to discriminate among its content advisors.

Recommendation: Maine’s Education Department should redraft all aspects of its *Draft Standards* that drew upon content advisors selected using racial categories.

Recommendation: Maine’s Education Department should document for the Maine public that it has selected all content advisors from the entire body of Maine citizenry, without regard to race or sex, including advisors who represent the full range and approximate proportions of the Maine citizenry’s beliefs.

Opaque Format Prevents Democratic Accountability

The *Draft Standards* presents content by subject strand and substrand, rather than by individual grade band, and it uses complicated tables rather than a simple list format. The *Draft Standards’* opaque format reduces comprehension by teachers, which limits its effectiveness, and reduces comprehension by the public, which prevents democratic accountability.

Recommendation: Maine’s Education Department should redraft the *Draft Standards* in a straightforward list format divided by individual grade band in Grades K-8 and by course subject in Grades 9-Diploma.

Pervasive Empty Verbiage

The draft Maine Social Studies Standards unfortunately draws upon the National Council for the Social Studies’ (NCSS) *College, Career, and Civic Life (C3) Framework for Social Studies State Standards*,⁴ which focuses upon banal jargon about “social studies skills,” leavened with radical polemic, at the expense of real content.⁵ The draft Maine standards therefore includes pervasive empty and undefined verbiage:

Apply civic virtues and democratic principles when engaging in civil discourse. [Civics & Government, Grades 9-Diploma, 3.4]

Students explain how economic decisions diversely affect the well-being of individuals, businesses, communities, and society. [Economics & Personal Finance, Grades 6-8, 2.1]

³ Title 20-A MRSA §4706: Instruction in American history, African American studies, Maine studies, Maine Native American history and the history of genocide, <https://www.mainelegislature.org/legis/statutes/20-a/title20-Asec4706-2.html>.

⁴ College, Career, and Civic Life (C3) Framework for Social Studies State Standards, National Council for the Social Studies, <https://www.socialstudies.org/standards/c3>.

⁵ The C3 Framework, Civics Alliance, <https://civicsalliance.org/the-c3-framework/>.

Students understand the changing perceptions of places and regions have significant economic, political, and cultural consequences in an increasingly globalized complicated world. [Geography, Grades 9-Diploma, 1.2]

Students draw on concepts and processes using primary and secondary sources from history to develop historical perspective and understand issues of continuity and change in the community, Maine, Wabanaki Nations, the United States, and the world. [History, Grades 9-Diploma, 1]

The Draft Standards in large areas provides no help to a principal or teacher who wants to proceed beyond banalities that are at a best a prologue to actual education.

Recommendation: Maine’s Education Department should end its reliance upon the NCSS’ *C3 Framework* and remove all concepts and languages from its *Draft Standards* that draw upon or parallel the concepts and language of the *C3 Framework*.

Recommendation: Maine’s Education Department should redraft the *Draft Standards* to remove all banal jargon and empty verbiage.

Language Errors

The *Draft Standards* generally gives an unfortunate appearance of illiteracy among its personnel by using *impact* rather than *affect*, *effect*, or *consequence*. A very large number of typos also reduce confidence in the Education Department; for example, the direction to explore “connections between geography, history, psychical science, [*sic*] mathematics, and art” [Geography, Grades 6-8, 1.3], which gives the impression that the Maine Education Department wishes social studies classes to explore the geographical implications of clairvoyance.

Recommendation: Maine’s Education Department, when drafting academic content standards, should employ only personnel with superior command of the English language and professional copyediting skills.

Absent Factual Content

Maine’s previous social standards already did an extraordinarily poor job at providing historical content. As the Fordham Institute noted in *The State of State Standards for Civics and U.S. History in 2021*, as it gave an F to both Maine’s United States history and Civics content in its 2019 social studies standards, Maine only provides an extraordinarily brief sketch of historical eras, and virtually no actual detail about our republic’s constitutional structure.⁶ The new *Draft Standards* largely preserves the inadequacy of the previous standards. It adds to the insufficient sketches of “Eras in United States History” and “Eras in World History” an equally insufficient sketch of “Eras in Wabanakis Studies History.” The closest it comes to substantive content about America’s constitutional structure is one sentence in its Grades 6-8 Civics strand: “Describing the structures and processes of United States government and government of the State of Maine, including the concepts of federaliam [*sic*] and checks and balances, and how these are framed by the United States Constitution, the Maine Constitution, and other foundational documents and primary sources.” [Civics, Grades 6-8, 1.2] The *Draft Standards* provides virtually no useful guidance to

⁶ *The State of State Standards for Civics and U.S. History in 2021*, Fordham Institute, <https://fordhaminstitute.org/national/research/state-state-standards-civics-and-us-history-2021>, pp. 159-63.

school districts, teachers, providers of professional development, textbook companies, or assessment companies.

School districts and teachers should have substantial liberty to determine their own curricula. But if there are going to be state standards at all, they should help school districts and teachers by providing a content-rich outline of subjects to be covered. The *Draft Standards*' excuse is, "School administrative units should develop a local curriculum that assists students in gaining a coherent, broad perspective on a variety of peoples, nations, regions, historical eras, and enduring themes." [Key Ideas in Social Studies Standards, Various] But if Maine's Education Department is not going to provide an outline of content to assist school districts, it should not waste taxpayer dollars by providing useless standards.

Recommendation: Maine's Education Department should redraft the *Draft Standards* to provide content-rich social studies standards, such as *American Birthright: The Civics Alliance's Model K-12 Social Studies Standards* and the social studies standards of Louisiana, South Dakota, and Virginia.⁷

Social Studies Education Subordinated to Action Civics

The *Draft Standards* subordinates social studies education throughout to "action civics," also known as "protest civics," which uses the pedagogy of "service-learning" to substitute vocational training in progressive activism for classroom civics education.⁸ The *Standards* uses the vocabulary of action civics pervasively, in such phrases as "active citizenship for social good" [Introduction], "civically engaged" [Introduction], and "protestors" [Civics & Government, Grades 6-8, 2.1]. Substantial portions of the Civics & Government and History strands, especially in Grades 6-8 and Grades 9-Diploma, consist of direction toward action civics, frequently in the guise of a "service-learning project."

Evaluating how people influence government, including voting, writing to legislators, performing community service, and engaging in civil discourse. [Civics & Government, Grades 9-Diploma, 2.3]

Students explore citizens' and institutions' effectiveness in addressing social and political assets and/or needs at the local, state, tribal, national, and/or international level. [Civics & Government, 3]

⁷ *American Birthright: The Civics Alliance's Model K-12 Social Studies Standards*, p. 18, <https://civicsalliance.org/american-birthright/>; Louisiana Student Standards Social Studies, Louisiana Department of Education, https://www.louisianabelieves.com/docs/default-source/academic-standards/02-08-2022---draft-louisiana-social-studies-standards.pdf?sfvrsn=52de6518_14; South Dakota Social Studies Standards, South Dakota Department of Education, <https://doe.sd.gov/contentstandards/documents/SS-Standards-2023.pdf>; 2023 History and Social Science Standards of Learning, Virginia Department of Education, <https://www.doe.virginia.gov/teaching-learning-assessment/k-12-standards-instruction/history-and-social-science/standards-of-learning-1276>.

⁸ Stanley Kurtz, "Action Civics' Replaces Citizenship with Partisanship," *The American Mind*, January 16, 2021, <https://americanmind.org/memo/action-civics-replaces-citizenship-with-partisanship/>; Thomas K. Lindsay and Lucy Meckler, "Action Civics," "New Civics," "Civic Engagement," and "Project-Based Civics": *Advances in Civic Education?* (Texas Public Policy Foundation, 2020), <https://www.texaspolicy.com/wp-content/uploads/2020/09/Lindsay-Meckler-Action-Civics.pdf>.

Describe ways in which people benefit from and are challenged by working together at the local, state, and national levels, emphasizing those of African Americans and Wabanaki Nations. [Civics & Government, Grade 5, 3.2]

Compare historical and contemporary means of changing societies and promoting the common good, including those that involve African Americans and other marginalized groups, in Maine, the Wabanaki Nations, the United States, and the world. [Civics & Government, Grades 6-8, 3.1]

Select, plan, and implement a civic action or service-learning project based on a school, community, or state asset or need, and analyze the project's effectiveness and civic contribution. [Civics & Government, Grades 6-8, 3.5]

Select, plan, and implement a civic action or service-learning project based on a community, school, state, tribal, national, or international asset or need, and evaluate the project's effectiveness and civic contribution. [Civics & Government, Grades 9-Diploma, 3.6]

Developing individual and collaborative decisions/plans by considering multiple points of view, weighing pros and cons, building on the ideas of others, and sharing information in an attempt to sway the opinions of others. [History, Grades 6-8, 1.2]

Developing individual and collaborative decisions/plans by considering multiple points of view, weighing pros and cons, building on the ideas of others, and sharing information in an attempt to sway the opinions of others. ... Applying appropriate and relevant information by making a decision related to the classroom, school, community, civic organization, Maine, Wabanaki Nations, the United States, or international entity. [History, Grades 9-Diploma, 1.1]

Compose a solution to address an identified example of discrimination or oppression or a statement that recognizes the effects of genocide in the local community, the state of Maine, the United States, or the world. [History, Grades 9-Diploma, 1.3]

The *Draft Standards* spends far more time directing students to engage in action civics than it does in directing them to learn about the ideals of liberty, civic virtue and republican self-government, or the structure of our constitutional republic.

Recommendation: Maine's Education Department should redraft the *Draft Standards* to remove all action civics, including service-learning.

Ideological Distortion of State Statute: Wabanaki Nations and African Americans

The *Draft Standards* ideologically distorts social studies education by mechanically including "Wabanaki Nations," "African Americans," and (occasionally) "women" throughout the *Draft Standards*. This mechanical inclusion is at best marginally relevant, as it subordinates what should be the study of all Americans' liberty and government to indoctrination in discriminatory identity-group theory (sometimes referred to as Critical Race Theory, "Diversity, Equity, and Inclusion" ideology, and so-called "anti-racism") grounded in the arbitrarily selected grievances of the progressive identity-group coalition. E.g.,

Provide examples of how people influence government and work for the common good including engaging in civil discourse at the school and local level such as suffrage, petition,

and protest, drawing on the experiences of Wabanaki, African Americans, and women.” [Civics & Government, Grade 3, 2.2]

Yet the mechanical inclusion of identity group ideology also affects areas of social studies instruction where they should be entirely irrelevant, such as Personal Finance & Economics and Geography.

Students compare and contrasting credit options, products, and services available to individuals including how these options may be affected based on individual and cultural identity (ie, [*sic*] gender, race, ability, etc[.])[.] [Personal Finance & Economics, Grades 9-Diploma, 1.7]

Students describe similarities and disparities between various economic and social goals within the local of community, Maine, Wabanaki Nations (to the economics of the local community in the past and present), and the United States. [Personal Finance & Economics, Grade 3, 2.2]

“Students explain careers with geographic skills- including ones with Wabanaki, African American, and women geographers.” [Geography, Grade 4, 1.3]

The *Draft Standards* justifies these intrusions as required by *Title 20-A MRSA §4706: Instruction in American history, African American studies, Maine studies, Maine Native American history and the history of genocide*.⁹ But this legislation simply states that “Maine Native American studies and Maine African American studies must be included.” The legislation does not require that the *Draft Standards* copy-and-paste “African American” and “Wabanaki Studies” into an extraordinarily large number of individual components of social studies instruction. The *Draft Standards*’ mechanical instructions, using almost identical language, give the impression of ideological fanaticism married to intellectual laziness. Their effect will be to coerce social studies teachers to impose equally mechanical and lazy “coverage” of African Americans and American Indians, at the cost of scarce classroom minutes that should be spent on actual social studies instruction.

Recommendation: Maine’s Education Department should redraft the *Draft Standards* to incorporate mention of African Americans and the Wabanaki Nations where relevant in a content-rich series of standards, and to remove identity group ideology from this coverage.

Ideological Distortion of State Statute: History of Genocide

The *Draft Standards* casually perverts the state mandate to include instruction in “The history of genocide, including the Holocaust.”¹⁰ The intent of this bill, on the evidence of the public testimony in its favor, was to teach about the actual Holocaust of European Jewry.¹¹ What the

⁹ Title 20-A MRSA §4706: Instruction in American history, African American studies, Maine studies, Maine Native American history and the history of genocide, <https://www.mainelegislature.org/legis/statutes/20-a/title20-Asec4706-2.html>.

¹⁰ Title 20-A MRSA §4706: Instruction in American history, African American studies, Maine studies, Maine Native American history and the history of genocide, <https://www.mainelegislature.org/legis/statutes/20-a/title20-Asec4706-2.html>.

¹¹ Public Hearing Testimony, An Act To Require Education about African-American History and the History of Genocide, https://legislature.maine.gov/legis/bills/display_ps.asp?paper=SP0310&PID=undefined&snum=129&sec3#.

Draft Standards actually have produced is a blood libel on Americans and Mainers, which calumnies Americans and Mainers as having committed genocide on African Americans and American Indians.

Using geographic inquiry, geospatial tools, and demographic data to predict and evaluate consequences of geographic influences on populations, including the Wabanaki Nations, African Americans, or on other populations impacted by genocide. (Examples include, the Holocaust, redlining, blockbusting, and gentrification) [Geography, Grades 9-Diploma, 1.1]

Synthesize primary and secondary sources, identify and analyze incidents of genocide in Maine, the United States, and the world. [History, Grades 6-8, 1.2]

Analyzing and evaluating the role of governments in the discrimination, oppression and historical genocide of African-American people in the community, state of Maine, the United States, and the world. [History, Grades 9-Diploma, 1.1]

Analyzing and evaluating the role of governments in the discrimination, oppression and historical genocide of the Wabanaki in the community, state of Maine, the United States, or the world. [History, Grades 9-Diploma, 1.2]

Students explain that certain groups, such as African-Americans, the Wabanaki Nations, as well as Jews and other groups specifically targeted in the Holocaust, have been historically singled out for discrimination, oppression and genocide. [History, Grade 5]

Identifying current events in their community, the state of Maine, the United States and other governments can or have contributed to discrimination, oppression and genocide. [History, Grades 9-Diploma, 2.2]

Designing a solution to begin to address the legacy of discrimination, oppression and genocide in the local community, state of Maine, the United States, or the world. [History, Grades 9-Diploma, 2.3]

Developing a solution to address an identified example of discrimination or oppression or a statement that recognizes the effects of genocide in the local community, the state of Maine, the United States, or the world. [History, Grades 9-Diploma, 2.4]

Analyze and evaluate the role of governments in the discrimination, oppression and historical genocide of African-American people in the community, state of Maine, the United States, and the world. [History, Grades 9-Diploma, 2.1]

Analyze and evaluate the role of governments in the discrimination, oppression and historical genocide of the Wabanaki in the community, state of Maine, the United States, or the world. [History, Grades 9-Diploma, 2.2]

Compose a solution to begin to address the legacy of discrimination, oppression and genocide in the local community, state of Maine, the United States, or the world. [History, Grades 9-Diploma, 2.5]

Much of this calumny is explicit. Other parts proceed from the *Draft Standards* pervasive conflation of “discrimination, oppression, and genocide”—which are nowhere defined. The *Draft Standards* conflates three distinct concepts, apparently as a way to teach that “discrimination” is scarcely distinguishable from genocide—and, as a corollary, that Maine and the United States are scarcely distinguishable from Nazi Germany.

The conflating use of “discrimination, oppression, and genocide” is stated most explicitly in, “Students recognize that genocide is [a or the] potential consequence of unaddressed discrimination and oppression.” [History, Grade 5] The Maine Education Department has committed itself elsewhere to “equity,” as well as so-called “anti-racism” and ‘decolonization.’¹² The corollary would seem to be that any opposition to this radical political programs is “discrimination” and “oppression,” and thus that any such opposition is pre-genocidal. The *Draft Standards* functions as a particularly ugly slander of every Maine citizen who opposes the radical ideology imposed by Maine’s Department of Education.

The slander is not just of living Maine citizens, but of Mainers and Americans of the past. Since the *Draft Standards* provides no actual historical content, one cannot tell what is the basis of this calumny. Does genocide refer to Maine’s Frontier Wars of the seventeenth and eighteenth centuries, highlights of which were the many Wabenaki raids on English settlements, such as the Raid of York in 1692 in which 100 English colonists were butchered? Does genocide refer to the broader calumny of “cultural genocide”—which is not genocide, and whose use for polemical purposes shamefully trivializes real genocide? Does “historical genocide of African-American people” refer to the Middle Passage, which, albeit a terrible event, was not genocide and was not in the United States? The *Draft Standards* includes in one list of examples, “the Holocaust, redlining, blockbusting, and gentrification”—it is unclear whether the drafters think gentrification actually is genocide, or whether their conflation of “discrimination” and “genocide” means they think that gentrification is merely a gateway to genocide. The *Draft Standards* complete lack of historical content means there is not even a basis for judging the purported grounds for this smear.

Of course any actual historical substance would show at once that the accusation of genocide is a calumny, which serves generally the radical polemic that seeks to delegitimize America. And it is worth repeating: this is not only a groundless calumny but also an ideological hijacking of the genocide education statute, which was intended to teach Mainers about the Holocaust.

Recommendation: Maine’s Education Department should redraft the *Draft Standards* to follow legislative intent and include genocide instruction standards that provide content-rich coverage of the Holocaust, as well as the Armenian Genocide, the Ukrainian Holodomor, and the Rwandan Tutsi Genocide, and to remove identity group ideology from this coverage.

Ideological Distortion of State Statute: Maine Studies Silenced

The same statute that mandates coverage of African-American and American Indian history also mandates coverage of “Maine’s cultural and ethnic heritage.”¹³ Yet the *Draft Standards* fails to mention “English American” and “Franco-American” (to mention only the two largest contributors to Maine’s cultural and ethnic heritage), either in mechanical copy-and-paste or in any substantive coverage. It is astonishing that a document so obsessed with “discrimination” does not think to mention it with reference to Franco-Americans—and that absence highlights the selective, indeed arbitrary, application of the *Draft Standards*’ vaunted concern about discrimination.

¹² Diversity, Equity, and Inclusion, Maine Department of Education, <https://www.maine.gov/doe/index.php/learning/content/socialstudies/resources/DEI>.

¹³ Title 20-A MRSA §4706: Instruction in American history, African American studies, Maine studies, Maine Native American history and the history of genocide, <https://www.mainelegislature.org/legis/statutes/20-a/title20-Asec4706-2.html>.

Recommendation: Maine’s Education Department should redraft the *Draft Standards* to provide a lengthy series of guidelines for instruction in the contribution of all of Maine’s peoples, including the English and French who are the largest contributors to Maine’s cultural and ethnic heritage.

Ideological Indoctrination: Undefined Concepts

The *Draft Standards* uses a large number of keywords and phrases that are part of radical polemical vocabulary. These include:

acknowledgment, active citizens, active citizenship, address issues, addressing social and political assets and/or needs, authentic voices, brave, citizens of the world, civic action, civic contribution, civically engaged, civil discourse collective actions, common good, community groups, community service, constructive action, cooperation, cultural identity, culturally aware, decisions, decolonization, deliberate, deliberative processes, democratic principles, democratic processes, denying rights, difficult questions, discrimination, disenfranchisement, disparities, diverse groups, diverse perspectives, economic equity, economic sustainability, empower, engage, enslavement, environment that supports civil discourse, exclusion, exploitation, fairness, gender, genocide, global citizen, globalization, human rights, identity, ideology, imposed political boundaries, inaction, inclusion, indigenous people, individual’s humanity, justice, marginalized, means of changing societies, minority rights, oppression, political asset, power, protest, racism, reflective, respect, responsible citizens, rights, service-learning project, social asset, social good, socially responsible, society’s wants and needs, solution, under represented persons, various theories of democracy, violence.

Among these undefined words and concepts, large numbers are used in central portions of the *Draft Standards*.

Introduction: active citizenship, authentic voices, citizens of the world, civically engaged, culturally aware, democratic processes, discrimination, diverse perspectives, empower, genocide, global citizen, oppression, social good, socially responsible.

Key Ideas in the Social Studies Standards: active citizens, address issues, brave, civil discourse, collective actions, constructive action, deliberate, difficult questions, environment that supports civil discourse, individual’s humanity, reflective, responsible citizens

Major Enduring Themes: cooperation, exploitation, justice, oppression, society’s wants and needs,

These concepts need to be defined, because radical polemical usage is very different from ordinary usage. In this vocabulary, for example, *equal opportunity* means *discrimination*; *assimilation* means *(cultural) genocide*; *racism* means *color-blindness*; *economic equity* means *economic redistribution*; *decolonization* means *massacres of innocent civilians*; and *violence* means *words I disagree with*.

Recommendation: Maine’s Education Department should remove from the *Draft Standards* every word and phrase drawn from radical polemical vocabulary. At the very least, the Department should define within the *Draft Standards* every one of these words and phrases, so that Maine’s citizens and policymakers may know precisely what beliefs and practices the Education Department endorses.

Ideological Indoctrination: Miscellaneous

The *Draft Standards* contains extensive miscellaneous ideological indoctrination, which we list in **Appendix 1: Miscellaneous Ideological Indoctrination**.

Recommendation: Maine's Education Department should remove from the *Draft Standards* every word and phrase that supports miscellaneous ideological indoctrination.

Independent Commission

The Maine Education Department's regular personnel have failed so completely to provide adequate social studies standards that social studies standards revision should not be undertaken entirely by the Department.

Recommendation: Maine's Education Department should ask Maine's policymakers to appoint an independent commission to redraft Maine's social studies standards. Effective revision of the *Standards* must be carried out by a commission independent of the Department personnel.

Conclusion

We urge the members of the Committee on Education and Cultural Affairs, and Maine legislators in general, to vote against L. D. 2182. The Maine Department of Education should rescind the *Draft Standards* and replace it with a content-rich, unpoliticized social studies standard that replaces inculcation of radical polemic with teaching the history of America and Maine. Its revision should follow all the Recommendations we have made in this public testimony. (See **Appendix 2: Collated Recommendations**.) We suggest that the Department examine our model *American Birthright* social studies standards, but we also suggest that it examine the fine alternate models of South Dakota, Virginia, and Louisiana. The Department also should request Maine policymakers to appoint an independent commission to redraft new social studies standards.

Respectfully yours,



Peter Wood

President, National Association of Scholars



David Randall

Executive Director, Civics Alliance

Appendix 1: Miscellaneous Ideological Indoctrination

1. The *Draft Standards* gives the impression that democracy (“majority rule”) is presumptively suspect, unless it protects “minority rights”: “Explore how government structures can result in majority rule that can protect minority rights, but also can result in discrimination, oppression, and genocide in marginalized groups.” [Civics, Grades 6-8, 1.3; and see Civics, Grades 9-Diploma, 1.3]
2. The *Draft Standards* apparently presumes that identity groups, rather than individuals, are the fundamental constituents of our republic: “Describing how the powers of government are limited or expanded to protect individual rights and minority rights as described in the United States Constitution, the Bill of Rights, and court cases and the risks inherent in denying rights to national, racial, ethnic, and religious groups.” [Civics, Grades 6-8, 2.2]
3. From the beginning, the *Draft Standards* presumes the identity-politics assumption, that group identities determine beliefs, and the arguments themselves need not be taken seriously: “Identify the beliefs, experiences, perspectives, and values that underlie their own points of view about civic issues.” [Civics, Grade 3, 3.1]
4. The *Draft Standards* inserts polemic into economics instruction by requiring instruction in “economic equity,” “economic sustainability,” and “the economic influence and lasting effects of enslavement, discrimination, and racism in Maine, the United States, and the world.” [Personal Finance & Economics, Grades 6-8, 2.3, 2.7; and see Personal Finance & Economics, Grades 6-8, 2.8; Personal Finance & Economics, Grades 9-Diploma, 2.9-10].
5. The *Draft Standards* imposes “land acknowledgment”: “Students use basic [*sic*] maps and globes to identify local and distant places and locations, directions (including N, S, E, and W), and basic physical, environmental, and cultural features, including the acknowledgment of the surrounding Wabanaki land.” [Geography, Grade 2, 1.1]
6. The *Draft Standards* subordinates geography to DEI: “Students demonstrate geographic inquiry on the topic of how geographic features unify or divide communities and regions as well as support diversity and the cultural aspects within, using a variety of sources.” [Geography, Grade 5, 1.3; and see Geography, Grades 6-8, 1.2] The *Draft Standards* also subordinates geography instruction to racially preferential job recruitment: “Learning about geographic professionals in Wabanaki, African American, and other marginalized communities.” [Geography, Grades 6-8, 1.2; and see Geography, Grades 9-Diploma, 1.3]
7. The *Draft Standards* extensively covers the radical concepts of “inclusion and exclusion.”
8. The *Draft Standards* provides a self-parody of its denial of common humanity: “Students recognize how people are alike and different, with emphasis on the Wabanaki Nations and African American community” [History, Kindergarten, 1.3; and see History, Grade 2, 1.3]
9. The *Draft Standards*, by its peculiar focus on negative relationships between identity groups, gives the impression that nothing else exists: “Identifying and analyzing incidents of violence and genocide that have characterized interactions between national, racial, ethnic, and religious [*sic*] groups.” [History, Grades, 6-8, 1.2]
10. The *Draft Standards* citation of “inaction” (History, Grades 9-Diploma, 1.2) presumes that “action” is the default, and “inaction” is culpable—when it is unclear what that action should have been. Citing “inaction” facilitates present-minded judgment of the past.

Appendix 2: Collated Recommendations

Maine's Education Department should redraft all aspects of its *Draft Standards* that drew upon content advisors selected using racial categories.

Maine's Education Department should document for the Maine public that it has selected all content advisors from the entire body of Maine citizenry, without regard to race or sex, including advisors who represent the full range and approximate proportions of the Maine citizenry's beliefs.

Maine's Education Department should redraft the *Draft Standards* in a straightforward list format divided by individual grade band in Grades K-8 and by course subject in Grades 9-Diploma.

Maine's Education Department should end its reliance upon the NCSS' *C3 Framework* and remove all concepts and languages from its *Draft Standards* that draw upon or parallel the concepts and language of the *C3 Framework*.

Maine's Education Department should redraft the *Draft Standards* to remove all banal jargon and empty verbiage.

Maine's Education Department, when drafting academic content standards, should employ only personnel with superior command of the English language and professional copyediting skills.

Maine's Education Department should redraft the *Draft Standards* to provide content-rich social studies standards, such as *American Birthright: The Civics Alliance's Model K-12 Social Studies Standards* and the social studies standards of Louisiana, South Dakota, and Virginia.

Maine's Education Department should redraft the *Draft Standards* to remove all action civics, including service-learning.

Maine's Education Department should redraft the *Draft Standards* to incorporate mention of African Americans and the Wabanaki Nations where relevant in a content-rich series of standards, and to remove identity group ideology from this coverage.

Maine's Education Department should redraft the *Draft Standards* to follow legislative intent and include genocide instruction standards that provide content-rich coverage of the Holocaust, as well as the Armenian Genocide, the Ukrainian Holodomor, and the Rwandan Tutsi Genocide, and to remove identity group ideology from this coverage.

Maine's Education Department should redraft the *Draft Standards* to provide a lengthy series of guidelines for instruction in the contribution of all of Maine's peoples, including the English and French who are the largest contributors to Maine's cultural and ethnic heritage.

Maine's Education Department should remove from the *Draft Standards* every word and phrase drawn from radical polemical vocabulary. At the very least, the Department should define within the *Draft Standards* every one of these words and phrases, so that Maine's citizens and policymakers may know precisely what beliefs and practices the Education Department endorses.

Maine's Education Department should remove from the *Draft Standards* every word and phrase that supports miscellaneous ideological indoctrination.

Maine's Education Department should ask Maine's policymakers to appoint an independent commission to redraft Maine's social studies standards. Effective revision of the *Standards* must be carried out by a commission independent of the Department personnel.