



California Council for the Social Studies
AN AFFILIATE OF NATIONAL COUNCIL FOR SOCIAL STUDIES

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August 5, 2007

Debra Strain
Regulations Coordinator, Legal Division
California Department of Education
1430 N Street, Suite 5319
Sacramento, CA 95814

Re: 15-Day Notice of Modifications to Text of Proposed Regulations, Instructional Materials

Dear Ms. Strain:

The California Council for the Social Studies promotes and encourages quality social studies education through service, advocacy and leadership development. As the largest history-social science professional organization in the state, we encourage our members to participate in efforts at local, state, and national levels to promote and support high quality history-social science education as a core subject for all students, K-12. A number of our members participated in the 2005 History-Social Science Instructional Materials State Adoption process by serving on the Instructional Materials Advisory Panel (IMAP).

Our members were enthusiastic about participating in the adoption process and looked forward to providing feedback to members of the Curriculum Commission and State Board of Education regarding instructional materials submitted for state adoption. Many were disheartened to learn, during final deliberations, that feedback regarding strengths and weaknesses of instructional materials was *not* allowed in final reports submitted to the Curriculum Commission. This experience prompts us to respond to the 15-Day Notice of Modifications to Text of Proposed Regulations regarding:

Section 9510, (m) "IMR/CRE Report of Findings" is compiled by CDE and contains the determinations of all the IMR and CRE review panels as to whether the instructional materials reviewed by each panel meet the content standards, curriculum frameworks, evaluation criteria, and social content standards for a particular adoption. The report shall include, at a minimum: (1) a recommendation for or against the adoption of each set of instructional materials, and (2) if applicable, a list of edits and

corrections that should be made to the instructional materials as a condition of adoption.

We believe that the expertise of classroom teachers is critically important in the selection of high quality instructional materials. Knowledge, skills, and experience play a valuable role in evaluating, historical perspectives, pedagogy, organization, assessment, and delivery of instruction. Feedback regarding strengths and weakness of individual instructional programs should be valued and appreciated by policymakers who make important decisions about the adoption of instructional materials.

Therefore, it is extremely important for IMRs and CREs to utilize rubrics or scoring guides in evaluating materials and be allowed to share their findings with the Curriculum Commission and State Board of Education. We agree that *The report shall include, at a minimum: (1) a recommendation for or against the adoption of each set of instructional materials* but the regulations should also allow IMR and CRE members the opportunity to provide information regarding strengths and weaknesses of proposed programs that speak beyond *a list of edits and corrections*.

This opinion is shared by a number of other professional organizations including the California Science Teachers Association, California Math Council, and Californians Together. These organizations, along with the California Council for the Social Studies issued a joint letter sent to Mr. Kenneth Noonan, President of the State Board of Education and members of the State Board of Education to express support of four of the recommendations of the Legislative Analyst's Office report, "Reforming California's Instructional Material Adoption Process."

Recommendation 6: Enhance information sharing.

Districts should have access to the informed judgments of the subjects-matter and pedagogic experts who have evaluated materials for adoption. We believe the LAO report and the scheduled revision of the Title V Regulations provide the State Board of Education with a unique opportunity to restructure the adoption process to restore public trust in the system and provide an efficient, cost-effective, and professional, rather than arbitrary, process by which curricular materials are recommended for adoption.

Thank you in advance, for your consideration. If you have further questions, please do not hesitate to contact me at (661) 533-2277 or by email at ccsorg@earthlink.net.

Respectfully submitted,

Jill Gordon
President