

JOHN R. MCGINLEY, JR., ESQ., CHAIRMAN  
ALVIN C. BUSH, VICE CHAIRMAN  
ARTHUR COCCODRILLI  
ROBERT J. HARBISON, III  
JOHN F. MIZNER, ESQ.  
ROBERT E. NYCE, EXECUTIVE DIRECTOR  
MARY S. WYATTE, CHIEF COUNSEL



PHONE: (717) 783-5417  
FAX: (717) 783-2664  
irrc@irrc.state.pa.us  
<http://www.irrc.state.pa.us>

**INDEPENDENT REGULATORY REVIEW COMMISSION**  
333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

April 18, 2002

State Board of Education  
c/o Honorable Charles B. Zogby, Secretary  
Department of Education  
333 Market Street, 10th Floor  
Harrisburg, PA 17126

Re: Regulation #6-275 (IRRC #2252)  
State Board of Education  
Academic Standards and Assessment for Civics  
and Government; Economics; Geography and History

Dear Secretary Zogby:

Enclosed are the Commission's Comments which list objections and suggestions for consideration when you prepare the final version of this regulation. These Comments are not a formal approval or disapproval; however, they specify the regulatory criteria which have not been met.

The Comments will soon be available on our website at [www.irrc.state.pa.us](http://www.irrc.state.pa.us). If you would like to discuss them, please contact my office at 783-5417.

Sincerely,

Robert E. Nyce  
Executive Director  
evp  
Enclosure

cc: Honorable Jess M. Stairs, Majority Chairman, House Education Committee  
Honorable Nicholas A. Colafella, Democratic Chairman, House Education Committee  
Honorable James J. Rhoades, Chairman, Senate Education Committee  
Honorable Allyson Y. Schwartz, Minority Chairperson, Senate Education Committee

# **Comments of the Independent Regulatory Review Commission**

on

## **State Board of Education Regulation No. 6-275**

### **Academic Standards and Assessment for Civics and Government; Economics; Geography and History**

April 18, 2002

We submit for your consideration the following objections and recommendations regarding this regulation. Each objection or recommendation includes a reference to the criteria in the Regulatory Review Act (71 P.S. § 745.5a(h) and (i)) which have not been met. The State Board of Education (Board) must respond to these Comments when it submits the final-form regulation. If the final-form regulation is not delivered by March 18, 2004, the regulation will be deemed withdrawn.

#### **General**

##### **1. Structure and content of the Standards. - Reasonableness.**

Commentators have stated that the content of the four standards is too detailed and cannot be covered in the time allotted for social studies. An alternative to the current structure would be one standard organized around themes that demonstrate the interrelationships between the four separate standards. In the final form regulation, the Board could consider a more streamlined approach to the four standards.

##### **2. Introductions. - Clarity.**

The introduction to the History standards includes a concise explanation of the general format of the standard. It states that the standards are broken down into categories, statements, bulleted items (descriptors) and examples. For clarity and consistency, similar language should be included in the introductions to the Civics and Government, Economics and Geography standards.

##### **3. Table of Contents. - Clarity.**

We have identified two inconsistencies between the Table of Contents and the format of the four standards.

First, the format of the Tables of Contents for the four standards is not consistent with the Tables of Contents of the existing academic standards for Science and Technology and Environment and Ecology. The Tables of Contents for the existing standards list categories and identify statements under those categories with corresponding capital letters. In the final-form regulation, the format of the Tables of Contents for these new standards should match the format of the existing standards.

Second, the standards listed in the Tables of Contents do not match the standards contained in the text. For example:

- Under the Civics and Government standards Section 5.1, the Table of Contents lists three standards, but the text of Section 5.1 contains 13 standards.
- Conversely, under the Geography standards in Section 7.1, the Table of Contents lists three standards, but the text of Section 7.1 only contains two standards.

In the final-form regulation, the Board should ensure that the content of each of the standards is accurately reflected in the Tables of Contents.

### **Civics and Government**

#### **4. Section 5.2. Rights and Responsibilities of Citizenship. - Clarity.**

In Standard 5.2.9.E, the word “the” should be inserted before the word “political.”

#### **5. Section 5.3. How Government Works. - Clarity.**

Standard 5.3.9.D lists the “Pennsylvania Utilities Commission” as an example of an independent state agency. The correct name of this agency is the “Pennsylvania Public Utilities Commission.”

#### **6. XV. Glossary. - Clarity.**

We have identified the following issues related to the terminology used in the Glossary and the text of standards:

- The following words and phrases are included in the Glossary, but are not used in the text of the Civics and Government standards: “Civil law,” “Civil liberties,” “Common law,” “Compromise,” “Concurrent powers,” “Confederation,” “Consent of the governed,” “Constitutionalism,” “Delegated powers,” “Diplomat,” “Judicial power” and “Political efficacy.” If the terms are not used within the text of the standards, then the Board should delete these terms from the Glossary.
- We have identified 34 words and phrases used in the text of the Civics and Government standards, but not included in the Glossary. They are listed in an attachment to this document (see Attachment A). A commentator on these standards notes that many of the teachers may not have any experience with political science and are unfamiliar with much of the terminology. Therefore, we suggest that the final-form regulation define these words and phrases in the Glossary.

### **Economics**

#### **7. XVIII. Glossary. - Clarity**

We have identified 37 technical words and phrases used in the text of the Economics standards, which are not included in the Glossary. They are listed in an attachment to this document (See Attachment B). For clarity, the final-form regulation should define these words and phrases in the Glossary.

## Geography

### 8. Section 7.1. Basic Geographic Literacy. - Clarity.

Standard 7.1.3.B uses “i.e.” in some of the descriptors as opposed to “e.g.” which is used throughout the standards. The appropriate abbreviation is “e.g.” and this standard should be changed to reflect the appropriate abbreviation.

### 9. Section 7.2. The Physical Characteristics of Places and Regions. - Clarity.

Standard 7.2.3.A requires students to identify “Earth’s basic physical systems” including “Lithosphere, Hydrosphere, Atmosphere, Biosphere.” In its comments, the House Education Committee Staff questioned the appropriateness of these terms for students up to third grade. We agree and suggest that these terms would be more appropriate under Standard 7.2.6.A.

### 10. Section 7.3. The Human Characteristics of Places and Regions. - Clarity.

Standard 7.3.12.C requires students to “Use models of the internal structure of cities (e.g., concentric zone model, sector *theory*, multiple nuclei *theory*).” The example should refer to “sector” and “multiple nuclei” models as opposed to theories. Further, the definition of the term “Sector model” in Section XXI, Glossary, should reflect the use of the term in the standards.

### 11. Section 7.4. The Interactions Between People and Places. - Clarity.

Standards 7.4.6.A and 7.4.9.A refer to “hazard-prone areas.” However, Section XXI, Glossary defines the term “natural hazard.” The defined term should be used in the standards.

### 12. XXI. Glossary. - Clarity.

We have identified the following issues related to the terminology used in the Glossary and the text of standards:

- The following terms are defined in the Glossary, but not used in the text of the standards: “Choropleth map,” “Climatic processes,” “Contour map,” “Demography,” “Cultural hearths,” “Equinox,” “Industrialization,” “Land degradation,” “Map projection,” “Regionalization” and “Urbanization.” If the terms are not used within the text of the standards, then the Board should delete these terms from the Glossary.
- The following technical terms are used in the text of the standards but not defined in the Glossary: “biomes,” “tertiary,” “legend” (i.e., relating to a map), “NAFTA,” “NATO” and “OAS.” Defining these terms would add clarity.
- The following common terms are defined in the Glossary: “Distribution,” “Population size” and “Satellite image.” We question whether it is necessary to define these terms.
- The definition of the term “Absolute location” states “The position of a point on Earth’s surface that can usually be described by latitude and longitude *but also including nine digit zip code and street address.*” We question whether the phrase “but also including nine digit zip code and street address” is relevant to this definition.
- The term “Intervening opportunities” should be changed to “Intervening opportunity” to be consistent with the tense of the term used within the standards.

## **History**

### **13. XXIII. Introduction. - Clarity.**

The Introduction preceding the History standards contains the following sentence: “Although different grade levels outline different chronological periods within the standards, it is intended, *as any good teacher would do*, that the specified chronological eras be linked to past learnings and that all eras be linked to the present.” Since the phrase “*as any good teacher would do*” is subjective, it should be removed from the final-form version of this rulemaking.

### **14. Section 8.3. - United States History. - Clarity.**

In Standard 8.3.3.A, there is a listing of “Individuals who are role models.” The examples listed include “...Tiger Woods, Cal Ripken, Jr., Sammy Sosa.” Why did the Board choose so many sports figures as examples of “role models” for United States history?

### **15. XXIV. Glossary. - Clarity.**

We have identified the following issues related to the terminology used in the Glossary and the text of the standards:

- The following terms are defined in the Glossary, but not used in the text of the standards: “Archive,” “Legends,” “Monument” and “Timelines.” If the terms are not used within the text of the standards, then the Board should delete these terms from the Glossary.
- The term “Memorial” is defined as “An object or ceremony serving as remembrance for a person, group, day, site or event.” Because the meaning of this term is commonly understood, we question whether it is necessary for this term to be defined.
- “AME Church” is listed as an example of a social organization. A definition of “AME Church” should be included in the Glossary.

**Attachment A**

**Terms to be defined in the Glossary for Civics and Government Standards**

Constitutional Government	Political Leadership	Framers of documents
Civic Life	Constitutional Democracy	Double Jeopardy
Preamble	Executive Branch	Political Unit
Civil Disobedience	Legislative Branch	United Nations
Direct Democracy	Judicial Branch	World Court
Representative Democracy	Bill	International Red Cross
Limited Government	Regulation	Amnesty International
Unlimited Government	Primary Election	World Council of Churches
Personal Rights	General Election	Equal Protection
Political Rights	Caucuses	Right to Counsel
Economic Rights	Electoral College	Civic Responsibilities
Personal Responsibilities		

## Attachment B

### Terms to be defined in the Glossary for Economics Standards

Output	Cartels	Inter-regional trade
Expansion	Limited resources scarcity	International trade
Contraction	Regional economy	Trade barrier
Recession	National economy	Renewable resources
Depression	International economy	Non-renewable resources
Market transaction	Limited resources	Flow resources
Non-competitive market	Unlimited wants	Labor market
Tariff	Capital resources	Stock
Quota	Allocation of resources	Bond
Exchange rate	Economic decision	Mutual fund
Trade balance	Decision making (in the context of marginal analysis)	Retirement savings
Price control	Import	Export
Monopoly		