

Content Advisor Response and Recommendations Regarding Proposed §113.26, Applied Personal Financial Literacy

Purpose and Overall Perspective

As a content advisor for the proposed Applied Personal Financial Literacy (PFL) TEKS, I appreciate the opportunity to review the public comments and the evolving social studies standards. My recommendations regarding PFL remain focused on content, clarity, rigor, relevance, and instructional feasibility. At the same time, the amendments now being considered across the broader social studies framework raise questions that are relevant to PFL because this course is being adopted within the same statutory, curricular, and procedural system.

I continue to support the central goal of the proposed PFL course: ensuring that Texas students leave high school prepared to make informed financial decisions. The draft appropriately emphasizes budgeting, saving and investing, credit and debt, insurance, taxes, digital financial security, postsecondary and career decisions, and emerging financial products and technologies. My principal recommendation remains greater depth and coherence rather than simply greater breadth.

I. Recommendations Specific to Applied Personal Financial Literacy

1. Scope and Volume of the TEKS

The proposed course contains a substantial amount of content for a one-half-credit course. I recommend a targeted review to consolidate duplicative material, remove unnecessary specificity, and distinguish essential financial literacy knowledge from examples that are better addressed through curriculum and instruction. The objective should be mastery of durable financial concepts and decision-making skills, not exposure to the largest possible number of topics.

2. Structure and Complexity of Student Expectations

Several student expectations combine multiple actions—identifying, calculating, comparing, analyzing, and evaluating—within a single standard. These should be divided into discrete, logically related expectations when doing so improves clarity, teachability, and assessability. For example, postsecondary financing options can be separated from the analysis of return on investment, student-loan implications, and opportunity costs.

3. Estate Planning and Legal Documents

The standards should not be interpreted as requiring students to prepare or execute legally binding documents. I recommend language such as: “explain the purpose and importance of estate planning, including wills, beneficiaries, powers of attorney, and medical directives.” This preserves the financial-literacy objective while avoiding ambiguity about legal practice.

4. History and Religious Literature Within PFL

Broader debates about the amount and framing of history or religious content in social studies should not be imported into PFL unless the material has a clear and direct connection to financial literacy. Where historical content is retained, I recommend language such as: “explain how historical documents and economic principles have influenced the development of American financial systems.” The standard should remain financial in purpose rather than becoming a vehicle for additional history or religious-literature instruction.

II. Broader Alignment Questions the Board Should Resolve

1. Demonstrate Compliance With Statutory Civics Requirements

The revised social studies courses state that the student expectations embed the statutory requirements of Texas Education Code §28.002, including the knowledge-of-civics provisions in §28.002(h-1), (h-2), and (h-3). Given the scale of the amendments, I do not believe the Board should rely solely on a general assertion in a course introduction. TEA should provide a course-by-course crosswalk identifying the specific Student Expectations that satisfy each statutory requirement.

I am particularly concerned about relying on introductory language to satisfy substantive statutory requirements. Educators participating in this process have pointed out that curriculum planning, instruction, and assessment are driven primarily by the Student Expectations, not by language placed in the introduction. If a statutory requirement does not appear meaningfully within the Student Expectations, we should ask whether it is likely to be taught or assessed in practice. Simply appending required concepts to an introduction may achieve technical compliance on paper without ensuring meaningful implementation in the classroom. This concern is compounded by the volume of content already assigned to these courses. If material is placed in the introduction because there is insufficient room or instructional time to incorporate it into the Student Expectations, there is an obvious practical question: when, and how, is it supposed to be taught?

2. Demonstrate Alignment With College, Career, and Military Readiness Standards

The TEKS development process contemplated alignment with the state's College, Career, and Military Readiness expectations. My understanding is that this alignment was supposed to be considered during the work-group process, yet the relevant standards were not presented to the work groups for review. That omission should be addressed before final adoption. TEA should provide a formal crosswalk demonstrating how the revised high-school courses align with the applicable College, Career, and Military Readiness standards, particularly those emphasizing analysis, interpretation, evaluation of evidence, reasoning, communication, and the ability to reach and defend conclusions.

This review is particularly important because many of the proposed courses contain substantially more prescribed content. Increasing the number of required names, events, documents, institutions, examples, and interpretations can reduce the instructional time available for the analytical and applied skills the standards themselves say students should develop. Alignment should therefore be demonstrated against the final amended courses, not assumed from earlier drafts.

3. Determine Whether the Cumulative Second-Reading Changes Are “Substantial”

The Board should evaluate second-reading amendments cumulatively rather than one at a time. The Board's operating procedures recognize that substantial changes at second reading warrant additional consideration, but the practical meaning of 'substantial' needs to be clear, objective, and consistently applied. In my view, cumulative revisions that materially alter more than 25 percent of a course should presumptively constitute a substantial change and trigger additional review. Whatever threshold the Board ultimately uses, it should be transparent and calculated across the course as a whole rather than amendment by amendment.

The magnitude of the recent revisions makes this more than a theoretical concern. Based on my review and information shared during this process, the final Grade 8 course adopted in June appears to have been changed across nearly 60 percent of the course. Proposed amendments to U.S. Government have been estimated to affect close to half of that course, while proposed revisions to World Geography have been

estimated at roughly 60 percent. The latest amendments to World History also contain extensive rewrites. These percentages should not be left to informal estimates. Before final action, TEA should quantify the number and percentage of Student Expectations added, deleted, or substantively revised in each course and identify which of those changes were reviewed by work groups, focus groups, content advisors, and the public.

4. Evaluate the Final Courses as Complete Curricula

The Board should evaluate each amended course as a coherent whole rather than treating dozens of individual amendments as isolated decisions. My concern is not simply procedural. When large portions of a course are rewritten at second reading, the practical effect is that teachers in focus groups, work-group members, content advisors, and members of the public may have reviewed and commented on standards that differ substantially from the standards ultimately adopted. Whether or not that is the intent, it risks undermining the value of the review process. The relevant questions are whether the final course is statutorily compliant, aligned with readiness standards, instructionally feasible, developmentally appropriate, historically and geographically coherent, and whether the final integrated product has received meaningful professional and public review.

III. Specific Implications for the History Courses

United States History

The proposed U.S. History course contains strong disciplinary-skill language. Students are expected to formulate historical questions, source and contextualize documents, corroborate evidence, evaluate credibility, construct written historical arguments, interpret visual evidence, analyze causation, and examine change and continuity. These are important improvements and should be preserved.

The concern is whether the expanding volume and prescriptiveness of the content standards will leave teachers enough time to use those skills meaningfully. The course introduction also establishes a particular interpretive frame around liberty, constitutional republicanism, national unity, free enterprise, and the Constitution as a vehicle for reform. Those themes are legitimate subjects of historical study, but the course should allow students to test historical claims against evidence, examine competing interpretations, and understand moments when American institutions both advanced and failed to protect the principles described in the introduction.

I also do not support the proposed amendment to Student Expectation 3(F) absent a clear demonstration of its relevance to the scope and purpose of U.S. History. The course has already expanded considerably, and each additional required topic carries an instructional cost. Before adding material at second reading, the Board should be able to articulate why the content is germane to this particular course, where it fits within the vertical sequence, and what existing content or instructional time it will displace. If that case cannot be made, I recommend retaining the previously reviewed language rather than adding the amendment.

Recommendation: retain the strengthened historical-thinking skills; review the course for content overload and unnecessary specificity; and ensure that interpretive statements function as subjects for historical inquiry rather than predetermined conclusions students are expected simply to reproduce.

United States Government

I am also concerned about growing duplication between U.S. History and U.S. Government. A substantial portion of the proposed Government course is devoted to historical documents, constitutional foundations,

and material students have already encountered in middle school and Grade 11 U.S. History. Repetition can be valuable when a later course demands greater sophistication, but the standards should make that progression explicit. Otherwise, students are likely to experience the material as repetition rather than deeper civic learning.

More importantly, the Board should ask what is being displaced. U.S. Government is one of the final opportunities before graduation to help students understand how government actually operates and how they can participate effectively in civic life. Students need meaningful opportunities to examine campaigns and elections; the development and role of political parties; how political beliefs are formed; the influence of traditional and social media; media literacy and misinformation; and the ways government and public policy affect their everyday lives. These are not peripheral topics. They are fundamental to preparing young people for responsible civic participation.

I am also concerned about proposed deletions or revisions that narrow students' opportunities to examine negative human impacts on the environment or materially alter how slavery, the slave trade, and the United States' historical relationship to those systems are presented. These subjects should be reviewed for accuracy, balance, and completeness using the same standards applied to other contested historical topics. Students should encounter difficult history through evidence and context rather than through omission or predetermined interpretation.

Recommendation: conduct a vertical-alignment review of U.S. History and U.S. Government to identify unnecessary repetition and the intended progression in rigor; preserve sufficient instructional space for applied civic literacy, elections, political parties, media literacy, and contemporary civic participation; and review substantive deletions and additions for historical accuracy, balance, and instructional consequences.

World History

The most recent World History amendments demonstrate why a whole-course review is necessary. The draft reaches from ancient Israel, Greece, and Rome through Christianity and Islam, medieval Europe, exploration, slavery, revolution, industrialization, imperialism, the world wars, communism, decolonization, terrorism, and globalization. At the same time, the course explicitly emphasizes the Western and American tradition.

I have particular concerns about the proposed treatment of early Islam in Student Expectations 8(D) and 8(E). Language characterizing the Prophet Muhammad principally through “brutal military campaigns,” the “normalization of slavery,” and the taking of female captives as “harem slaves,” followed by a standard describing jihad primarily as a cause of conquest of Christian lands, is unusually charged and prescriptive for a set of academic standards. My concern is not that warfare, slavery, conquest, or religious conflict should be excluded from the study of early Islam. They should be taught where historically relevant. The question is whether the TEKS themselves should direct students toward a singular negative characterization rather than identify the essential historical knowledge students should examine using the source-analysis and historical-reasoning skills established elsewhere in the course.

I recommend replacing those expectations with more neutral and academically framed language. For 8(D): “describe the origins of Islam, including the teachings of the Prophet Muhammad, the development of early Islamic law and governance, and the unification of the Arabian Peninsula.” For 8(E): “describe the expansion of the early Islamic Caliphates and their contributions to mathematics, medicine, and philosophy, including the preservation and transmission of ancient Greek and Roman texts.” These revisions do not prevent

teachers from addressing conflict, conquest, slavery, or competing interpretations. Rather, they establish a broader historical framework within which those subjects can be examined with evidence and context.

I have a similar concern about the formulation of Student Expectation 15(A), which identifies “key features” of Pre-Columbian civilizations but selects Aztec tribute systems and human sacrifice alongside Incan infrastructure and Taíno village life and trade. Human sacrifice is historically relevant to the study of the Aztec civilization, but its selection as one of the defining “key features” raises a broader standards question: What criteria are being used to determine which characteristics are sufficiently important to define a civilization, and are those criteria being applied consistently across cultures? A balanced standard should expose students to political, economic, intellectual, technological, agricultural, and religious dimensions rather than defining a civilization disproportionately through a practice likely to evoke a negative judgment.

I therefore recommend revising 15(A) to read: “identify key features of Pre-Columbian civilizations, including Aztec agricultural and tribute systems and religious practices, Mayan writing, astronomy, and mathematics, Incan road networks and agricultural terracing, and Taíno village life and trade in the Caribbean.” This retains religion within the Aztec standard while providing a more representative comparison of the achievements, institutions, and practices of the civilizations being studied.

More broadly, the standards should apply comparable historical methods and levels of contextualization to all religious traditions and civilizations. The issue is not whether difficult or troubling aspects of history should be taught; they should. The issue is whether the TEKS establish a consistent academic framework that allows students to examine those subjects through evidence, context, comparison, and historical reasoning rather than through selectively evaluative wording.

Recommendation: revise 8(D), 8(E), and 15(A) as described above; conduct a balance and accuracy review across civilizations and religions; reduce content density where necessary; preserve the strong source-analysis and historical-reasoning skills in the introduction; and ensure that students have sufficient opportunity to compare evidence and perspectives rather than memorize prescribed interpretations.

Grade 8 and the Middle-School Sequence

The Grade 8 second-reading proposal is a significant structural change. It describes Grade 8 as a Texas history capstone covering the earliest human presence through the early twenty-first century and asks students to place Texas within regional, national, and global contexts. That may produce a coherent Texas course, but it should be evaluated against the entire Grades 3–8 vertical sequence to identify repetition, displacement of U.S. and world history, and developmental appropriateness.

The scale of that revision also raises a procedural question. If nearly 60 percent of a course is altered at second reading, I believe the Board should explain how that outcome is consistent with its published procedures governing substantial changes. At a minimum, the percentage of the course affected should be formally calculated and the final integrated standards should receive an additional review when the changes cross an established threshold.

The Grade 6 proposal likewise combines world, U.S., and Texas developments in the nineteenth and early twentieth centuries, including revolution, the Early Republic, westward expansion, Texas independence, the Mexican-American War, slavery, the Civil War, Reconstruction, industrialization, immigration, and the Gilded Age. This reinforces the need for a vertical-alignment map showing exactly where essential U.S., Texas, world, civics, economics, and geography content is introduced, reinforced, and mastered.

IV. Specific Implications for World Geography

World Geography deserves particular attention because the course risks becoming a region-by-region checklist containing substantial historical and political content rather than a rigorous geography course. Public comments have raised the same concern: geography should remain a distinct discipline centered on spatial reasoning, patterns and processes, human-environment interaction, population, migration, economic geography, cultural landscapes, boundaries, and geospatial evidence.

The procedural concern is significant here as well. The proposed World Geography overhaul has been estimated to affect roughly 60 percent of the course. TEA should verify that figure and, if the cumulative changes are of that magnitude, determine whether additional review is required. A revision of that scale should also be tested against the original disciplinary purpose of the course and against the feedback already provided by educators and reviewers.

The second-reading amendments contain useful additions, including references to spatial data, GIS mapping, demographic records, economic indicators, geographic field data, human-environment interactions, migration, boundaries, and spatial organization. These should become the organizing intellectual framework of the course rather than supplemental skills attached to a long list of regional facts.

Recommendation: require recurring geographic inquiry in every regional unit. Students should ask geographic questions, analyze maps and spatial datasets, interpret geospatial evidence, examine human-environment systems, evaluate regional patterns, and communicate evidence-based geographic conclusions. Historical content should be included when it helps explain a geographic pattern or process, but World Geography should not function primarily as another history survey.

V. Technical and Drafting Quality of Second-Reading Amendments

The volume and pace of the second-reading amendments also create a more basic quality-control concern. In reviewing the proposed language, I have encountered places where additions and strike-throughs appear to create grammatical problems, awkward sentence construction, inconsistent numbering, or unclear meaning. These may seem minor compared with the substantive issues discussed above, but they matter in a document that will become administrative rule and guide curriculum, instructional materials, assessment, and classroom practice for years.

I recommend that every amended course receive a complete technical edit after all second-reading amendments are integrated and before final adoption. That review should address grammar, syntax, punctuation, numbering, internal cross-references, duplicated or conflicting language, consistency of terminology, and whether the final sentence created by combined insertions and deletions actually says what the Board intends. Significant late-stage amendments should not be adopted simply as a collection of individual markups without reviewing the integrated rule text as a whole.

VI. Relationship of These Issues to PFL

These broader concerns do not mean that the PFL course should absorb additional history, civics, or geography content. In fact, they reinforce the opposite principle: each course should have a clear disciplinary purpose. PFL should teach students how to make informed financial decisions. World Geography should teach students to think geographically. History courses should teach students both

essential historical knowledge and how to investigate the past using evidence. Civics requirements should be explicitly mapped to the courses in which they are taught.

The common challenge across the proposed standards is the temptation to solve every curricular concern by adding another required topic. There is an opportunity cost to curriculum just as surely as there is an opportunity cost in personal finance. Every additional fact, document, person, example, or prescribed interpretation consumes instructional time that cannot be spent on application, analysis, discussion, writing, media literacy, geographic inquiry, or authentic problem solving. That principle should inform our review of PFL, Government, History, and Geography alike.

VII. Recommended Actions Before Final Adoption

- Provide a statutory crosswalk showing where each applicable requirement of TEC §28.002, including §28.002(h-2), is satisfied in the final TEKS.
- Provide a College, Career, and Military Readiness alignment crosswalk for the amended high-school courses.
- Quantify cumulative second-reading changes by course, publish the methodology used to calculate the percentage affected, and determine whether those changes are substantial under SBOE operating rules.
- Establish an objective threshold for substantial second-reading changes; I recommend that revisions materially affecting more than 25 percent of a course presumptively trigger additional review.
- Conduct a vertical-alignment review across Grades K–12 to identify repetition, gaps, and displaced content.
- Conduct an instructional-feasibility review based on actual available instructional time, not simply the number of standards.
- Preserve and strengthen disciplinary thinking: historical inquiry in history, spatial reasoning in geography, and authentic financial decision-making in PFL.
- Review U.S. Government and U.S. History together for unnecessary duplication and preserve sufficient instructional time for elections, campaigns, political parties, media literacy, political belief formation, and applied civic participation.
- Review World History for balance, historical precision, and comparable treatment of religions, civilizations, slavery, imperialism, and non-Western societies.
- Recenter World Geography on geographic inquiry and geospatial analysis rather than historical coverage.
- Streamline PFL so every required expectation has a direct and defensible relationship to personal financial literacy.
- Provide educators and content advisors a meaningful opportunity to review the final integrated courses when cumulative amendments materially change what was previously reviewed.
- Revise World History 8(D) and 8(E) to use neutral, academically framed language that addresses the origins and expansion of Islam while allowing conflict, conquest, slavery, and religious interaction to be examined through evidence and context.
- Revise World History 15(A) so the identified “key features” of Pre-Columbian civilizations reflect a balanced range of political, economic, intellectual, technological, agricultural, and religious characteristics.
- Require proponents of late-stage additions such as the proposed U.S. History 3(F) amendment to demonstrate the content's relevance to the course, vertical alignment, and instructional opportunity cost.

- Conduct a complete technical and grammatical review of every course after second-reading amendments are integrated and before final adoption.

Conclusion

I support the Board's effort to strengthen social studies instruction and believe many elements of the proposed standards are substantive and worthwhile. My concern is both substantive and procedural. Rigor should not be equated with volume, specificity, or the number of required facts, and meaningful review should not end before the standards themselves stop changing. Genuine rigor comes from combining essential knowledge with the ability to analyze evidence, reason across competing claims, apply disciplinary tools, and communicate conclusions. A credible standards process should also ensure that the final courses—not merely earlier drafts—receive the statutory, alignment, educator, content-advisor, and public review appropriate to the magnitude of the changes.

For Applied Personal Financial Literacy, that means students should leave the course capable of navigating real financial decisions. For history, it means students should understand the past while learning how historical knowledge is constructed and evaluated. For geography, it means students should be able to analyze the spatial patterns and human-environment systems that shape an interconnected world. Before final adoption, the Board should ensure that the amended standards accomplish those purposes while also satisfying statutory requirements, readiness expectations, and the Board's own procedural safeguards.