

## Debating <sup>the</sup> DOCUMENTS

Interpreting Alternative Viewpoints  
in Primary Source Documents

# Pluribus & Unum The Diversity Debate

*Is the United States a mosaic of separate cultural subgroups, or is it one nation based on an American cultural pattern shared by all?*



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**DOCUMENTS**

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# *Pluribus & Unum* **The Diversity Debate**

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# Teacher Introduction

## ★ Using Primary Sources

Primary sources are called “primary” because they are first-hand records of a past era or historical event. They are the raw materials, or the evidence, on which historians base their “secondary” accounts of the past.

A rapidly growing number of history teachers today are using primary sources. Why? Perhaps it’s because primary sources give students a better sense of what history is and what historians do. Such sources also help students see the past from a variety of viewpoints. Moreover, primary sources make history vivid and bring it to life.

However, primary sources are not easy to use. They can be confusing. They can be biased. They rarely all agree. Primary sources must be interpreted and set in context. To do this, students need historical background knowledge. *Debating the Documents* helps students handle such challenges by giving them a useful framework for analyzing sources that conflict with one another.



*“Multiple,  
conflicting  
perspectives are  
among the truths  
of history.  
No single  
objective or  
universal account  
could ever put an  
end to this endless  
creative dialogue  
within and  
between the past  
and the present.”*

---

From the 2011 Statement on Standards  
of Professional Conduct of the Council of  
the American Historical Association.



## ★ *The Debating the Documents Series*

Each *Debating the Documents* booklet includes the same sequence of reproducible worksheets. If students use several booklets over time, they will get regular practice at interpreting and comparing conflicting sources. In this way, they can learn the skills and habits needed to get the most out of primary sources.

### **Each *Debating the Documents* Booklet Includes**

- **Suggestions for the Student and an Introductory Essay.** The student gets instructions and a one-page essay providing background on the booklet's topic. A time line on the topic is also included.
- **Two Groups of Contrasting Primary Source Documents.** In most of the booklets, students get one pair of visual sources and one pair of written sources. In some cases, more than two are provided for each. Background is provided on each source. *Within each group, the sources clash in a very clear way.* (The sources are not always exact opposites, but they do always differ in some obvious way.)
- **Three Worksheets for Each Document Group.** Students use the first two worksheets to take notes on the sources. The third worksheet asks which source the student thinks would be most useful to a historian.
- **One DBQ.** On page 20, a document-based question (DBQ) asks students to write an effective essay using all of the booklet's primary sources.

## ★ *How to Use This Booklet*

### **1. Have students read “Suggestions for the Student” and the Introductory Essay.**

Give them copies of pages 5–7. Ask them to read the instructions and then read the introductory essay on the topic. The time line gives them additional information on that topic. This reading could be done in class or as a homework assignment.

### **2. Have students do the worksheets.**

Make copies of the worksheets and the pages with the sources. Ask students to study the background information on each source and the source itself. Then have them take notes on the sources using the worksheets. If students have access to a computer, have them review the primary sources digitally.

### 3. “Debate the documents” as a class.

Have students use their worksheet notes to debate the primary source documents as a class. Urge students to follow these ground rules:

- Use your worksheets as a guide for the discussion or debate.
- Try to reach agreement about the main ideas and the significance of each primary source document.
- Look for points of agreement as well as disagreement between the primary sources.
- Listen closely to all points of view about each primary source.
- Focus on the usefulness of each source to the historian, not merely on whether you agree or disagree with that source’s point of view.

### 4. Have students do the final DBQ.

A DBQ is an essay question about a set of primary source documents. To answer the DBQ, students write essays using evidence from the sources and their own background knowledge of the historical era. (See the next page for a DBQ scoring guide to use in evaluating these essays.)

The DBQ assignment on page 20 includes guidelines for writing a DBQ essay. Here are some additional points to make with students about preparing to write this kind of essay.

#### **The DBQ for this Booklet (see page 20):**

“America is not better off for the way it has stressed ethnic, racial, and other kinds of group identity and pride in recent years.” Do you agree or disagree with this statement? Why?

- Analyze the question carefully.
- Use your background knowledge to set sources in their historical context.
- Question and interpret sources actively. Do not accept them at face value.
- Use sources meaningfully to support your essay’s thesis.
- Pay attention to the overall organization of your essay.



## ★ *Complete DBQ Scoring Guide*

Use this guide in evaluating the DBQ for this booklet. Use this scoring guide with students who are already familiar with using primary sources and writing DBQ essays.

### **Excellent Essay**

- Offers a clear answer or thesis explicitly addressing all aspects of the essay question.
- Does a careful job of interpreting many or most of the documents and relating them clearly to the thesis and the DBQ. Deals with conflicting documents effectively.
- Uses details and examples effectively to support the thesis and other main ideas. Explains the significance of those details and examples well.
- Uses background knowledge and the documents in a balanced way.
- Is well written; clear transitions make the essay easy to follow from point to point. Only a few minor writing errors or errors of fact.

### **Good Essay**

- Offers a reasonable thesis addressing the essential points of the essay question.
- Adequately interprets at least some of the documents and relates them to the thesis and the DBQ.
- Usually relates details and examples meaningfully to the thesis or other main ideas.
- Includes some relevant background knowledge.
- May have some writing errors or errors of fact, as long as these do not invalidate the essay's overall argument or point of view.

### **Fair Essay**

- Offers at least a partly developed thesis addressing the essay question.
- Adequately interprets at least a few of the documents.
- Relates only a few of the details and examples to the thesis or other main ideas.
- Includes some background knowledge.
- Has several writing errors or errors of fact that make it harder to understand the essay's overall argument or point of view.

### **Poor Essay**

- Offers no clear thesis or answer addressing the DBQ.
- Uses few documents effectively other than referring to them in “laundry list” style, with no meaningful relationship to a thesis or any main point.
- Uses details and examples unrelated to the thesis or other main ideas. Does not explain the significance of these details and examples.
- Is not clearly written, with some major writing errors or errors of fact.

# Suggestions to the Student

## ★ *Using Primary Sources*

A primary source is any record of evidence from the past. Many things are primary sources: letters, diary entries, official documents, photos, cartoons, wills, maps, charts, etc. They are called “primary” because they are first-hand records of a past event or time period. This *Debating the Documents* lesson is based on two groups of primary source documents. Within each group, the sources conflict with one another. That is, they express different or even opposed points of view. You need to decide which source is more reliable, more useful, or more typical of the time period. This is what historians do all the time. Usually, you will be able to learn something about the past from each source, even when the sources clash with one another in dramatic ways.

## ★ *How to Use This Booklet*

### 1. Read the one-page introductory essay.

This gives you background information that will help you analyze the primary source documents and do the exercises for this *Debating the Documents* lesson. The time line gives you additional information you will find helpful.



### 2. Study the primary source documents for this lesson.

For this lesson, you get two groups of sources. The sources within each group conflict with one another. Some of these sources are visuals, others are written sources. With visual sources, pay attention not only to the image’s “content” (its subject matter) but also to its artistic style, shading, composition, camera angle, symbols, and other features that add to the image’s meaning. With written sources, notice the writing style, bias, even what the source leaves out or does not talk about. Think about each source’s author, that author’s reasons for writing, and the likely audience for the source. These considerations give you clues as to the source’s historical value.

### 3. Use the worksheets to analyze each group of primary source documents.

For each group of sources, you get three worksheets. Use the “Study the Document” worksheets to take notes on each source. Use the “Comparing the Documents” worksheet to decide which of the sources would be most useful to a historian.

### 4. As a class, debate the documents.

Use your worksheet notes to help you take part in this debate.

### 5. Do the final DBQ.

“DBQ” means “document-based question.” A DBQ is a question along with several primary source documents. To answer the DBQ, write an essay using evidence from the documents and your own background history knowledge.

## *Pluribus & Unum*

In 1782, during the American Revolution, the Continental Congress approved a motto for the Great Seal of the United States. That motto was the Latin phrase *E Pluribus Unum*. This means “From many, one,” and it refers to the uniting of 13 separate colonies into one nation. (The motto itself has 13 letters.)

An early sketch for the Great Seal also included the symbols of several nations from which many American colonists had originally come. Already in 1782, that is, America was a land of many peoples, with diverse ethnic, cultural, and racial characteristics. The motto *E Pluribus Unum* honored the idea that this diverse mixture was now also united into a single society. Yet, has the nation been united in this way? And if so, have its many groups also been able to hold on to what is most distinct and important to them?

These questions have become more urgent in recent decades. Why? In large part because of two developments—the civil rights struggles of the 1950s and ‘60s and the enormous wave of immigration that began in 1965.

The civil rights movement was a momentous struggle to end the legalized segregation that kept blacks and whites apart in many ways after the end of slavery in 1865. The aim of this struggle was to achieve a “color blind” society—a society with blacks fully integrated into all aspects of social life, including schools, jobs, neighborhoods, professions, etc. The goal was best summed up by Martin Luther King Jr. in 1963 in his famous “I Have a Dream” speech, when he longed for the day when his children would be judged “not by the color of their skin but by the content of their character.”

The civil rights movement achieved great breakthroughs. Yet the urban riots of the late 1960s made it clear that deep racial divisions continued to exist. Moreover, black nationalists

and black power advocates soon began questioning the whole idea of integrating blacks and whites. Black pride and black self-help seemed more important to them. In other words, their goal was to strengthen black identity rather than the American identity of African Americans.

This new emphasis on ethnic and racial group identity came at a time when arguments over affirmative action also began to heat up. Affirmative action programs sought to give extra help to groups that had been treated unfairly in the past—mainly racial and ethnic minorities and women. Some saw affirmative action as necessary to achieve real equality, especially in education and jobs. Others saw affirmative action as a new form of “reverse racism” or “reverse discrimination” against whites and males.

Affirmative action was at first justified, mainly as a way to make up for past injustice and discrimination. Later, many also promoted it as a way to ensure a new, more inclusive diversity in American life as well.

Adding to this diversity were newcomers from South and Central America, from Asia, and from many other parts of the world. A new immigration law in 1965 ended restrictions that had made it hard for such non-European immigrants to enter the country. Since 1965, tens of millions of them have arrived, adding a rich variety of new cultural patterns to our lives. As with affirmative action, the new immigration has stirred up debate and conflict. And in both cases, the argument is about the proper relationship of *unum* and *pluribus*.

Do these new sources of diversity and group identity divide and weaken the nation and Americans’ broader sense of national identity? Or do they strengthen the culture and give it a richer variety as they equalize chances for all? The sources for this lesson will help you think about and debate these questions.

# Pluribus & Unum: A Time Line

1776

• • •

The Declaration of Independence says it is self-evident that all men are created equal and are endowed with rights to life, liberty, and the pursuit of happiness.

1860s

• • •

Congress approves the Great Seal with the words *E Pluribus Unum* on it.

1860s

• • •

The 13th Amendment abolishes slavery. The 14th Amendment forbids states from denying “life, liberty, or property” without due process of law and guarantees equal protection under the laws.

1896

• • •

In *Plessy v. Ferguson*, the Supreme Court holds that “separate but equal” accommodations are constitutional, easing the way for the era of segregation.

1954

• • •

In *Brown v. Board of Education* the Supreme Court ends legalized school segregation and calls for school integration with “all deliberate speed.”

1963

• • •

Martin Luther King Jr. delivers his famous “I Have a Dream” speech.

1964

• • •

The 1964 Civil Rights Act ends segregation in all public facilities. Title VII of this act prohibits employment discrimination on the basis of gender as well as race, religion, or national origin. The Equal Employment Opportunities Commission (EEOC) is empowered to bring suits to enforce the Act.

1965

• • •

In an executive order, President Johnson requires federal contractors to take “affirmative action” to ensure equality of employment. The Immigration and Nationality Act Amendments of 1965 end national-origin quotas and launch a huge wave of immigration. By the mid-2000s, the wave will bring about 30,000,000 legal immigrants into the country. Millions more enter illegally, especially from Mexico. Unlike previous immigration waves, a huge share of this one is made up of Asians, Hispanics, and other non-Europeans.

1966

• • •

Inspired by Malcolm X and other black nationalists, “Black Power” supporters divide the civil rights movement. They stress separate black development over full integration as their main goal.

1969

• • •

President Nixon’s “Philadelphia Order” greatly strengthens Lyndon Johnson’s 1965 executive order calling for affirmative action in awarding contracts to federal contractors. Nixon’s order provides for “goals and timetables” in awarding construction contracts to minority contractors in Philadelphia. This order is extended in 1970 to non-construction federal contractors.

1972

• • •

Title IX of the Educational Amendments to the Civil Rights Act prohibits discrimination against girls and women in federally funded education.

1978

• • •

In *University of California v. Bakke*, the Supreme Court says affirmative action quotas are unconstitutional, but minority status can be a factor in admissions.

1995

• • •

In *Adarand Constructors v. Peña*, the Supreme Court strictly limits the use of affirmative action programs awarding contracts to minority businesses.

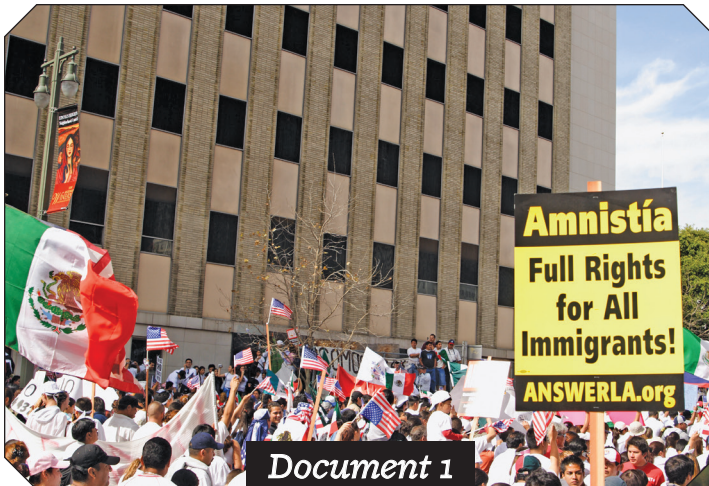
2003

• • •

In *Grutter v. Bollinger*, the Supreme Court upholds the principle that public universities may use affirmative action to ensure a “diverse” student body.



## Visual Primary Source Documents 1 & 2



**Document 1**

Sean Haley, Shutterstock Inc.



**Document 2**

Thomas M. Spindle, Shutterstock Inc.

### Information on Documents 1 & 2

**Document 1.** In the summer of 2006, huge protest marches such as this one took place in many cities. The marchers were speaking out against proposed laws to stop illegal immigration, mainly from Mexico. Many marchers carried U.S. flags, but many also carried Mexican flags. Some marchers chanted “Mexico, Mexico,” and a few insisted they were as much citizens of Mexico as citizens of the United States.

**Document 2.** The immigration marches of 2006 won support from some Americans but provoked an angry backlash from others—including these people greeting one of the marches. The marches and counter-marches were mainly about the issue of illegal immigration. However, they also raised the question of loyalty to one’s ethnic or other subgroup heritage and loyalty to the nation as a whole.

## Visual Primary Source Documents 3 & 4



**Document 3**

Funkenstien, Shutterstock Inc.



**Document 4**

NorthGeorgiaMedia, Shutterstock Inc.

### *Information on Documents 3 & 4*

**Document 3.** One artist's idea of a group of people representing various ethnic backgrounds all volunteering together.

**Document 4.** This photo shows a family of mixed ethnic heritage celebrating at an American Thanksgiving Day dinner, complete with turkey, corn, and other traditional foods.

## Study the Documents: Visual Sources 1 & 2

*Instructions:* Take notes on these questions. Use your notes to discuss the documents and answer the DBQ.

### 1 Main Idea—Doc. 1 \_\_\_\_\_

Read the information provided with this photograph. Based on this information, write a caption of just one or two sentences to accompany this photo in a newspaper article on the topic.

### 2 Main Idea—Doc. 2 \_\_\_\_\_

Read the information provided with this photograph. Based on this information, write a caption of just one or two sentences to accompany this photo in a newspaper article on the topic.

### 3 Background Information \_\_\_\_\_

List the things you know about the immigration debates leading up to and following the huge marches shown here. As much as you can, explain the meaning of the signs these marchers are carrying.

### 4 Bias, or Point of View \_\_\_\_\_

What overall point of view do you think the marchers in these two photos would have about the phrase *E Pluribus Unum*? Create an imaginary dialogue or exchange of views on this phrase among the people in these two photos.



## Study the Documents: Visual Sources 3 & 4

*Instructions:* Take notes on these questions. Use your notes to discuss the documents and answer the DBQ.

### 1 Main Idea—Doc. 3

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Create a caption of just one or two sentences that sums up what you think this illustration's key point is. Include the phrase *E Pluribus Unum* in the caption and explain what view about it the illustration expresses.

### 2 Point of View—Doc. 4

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This photo shows a family of mixed racial and ethnic heritage enjoying a traditional Thanksgiving Day meal. Is the photo simply a neutral or factual primary source document? Or does the photo express a definite point of view or bias regarding the concept of *E Pluribus Unum*? Briefly explain your answer.

### 3 Compare and Contrast

---

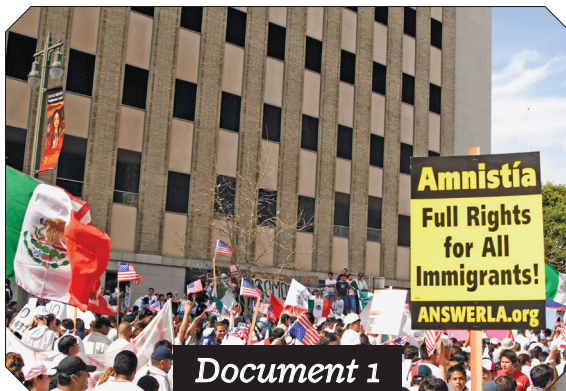
Of the four visual sources provided (Visual Source Documents 1–4), which two contrast most sharply with each other? Make your choices and sum up their contrasting viewpoints.

# Comparing the Documents

## ★ *The Visual Sources*

Answer the question by checking one box below. Then complete the statements on the Comparison Essay worksheet. Use all your notes to help you take part in an all-class debate about these documents—and to answer the final DBQ for the lesson.

**Which of these primary source documents would be most useful to a historian trying to understand the debate about diversity in America today?**



Documents 1 & 2 ☐

Documents 3 & 4 ☐

## Comparison Essay

*I chose Documents \_\_\_\_\_ because:*

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*I did **not** choose Documents \_\_\_\_\_.*

*However, a historian still might use the documents in the following way:*

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**Keep this in mind:** Some sources are very biased. A biased source is one that shows you only one side of an issue. That is, it takes a clear stand or expresses a very strong opinion about something. A biased source may be one-sided, but it can still help you to understand its time period. For example, a biased editorial cartoon may show how people felt about an issue at the time. The usefulness of a source depends most of all on what questions you ask about that time in the past.

## Written Primary Source Document 1

### Information on Document 1

This is part of the Supreme Court's 5–4 ruling in the 2003 case *Grutter v. Bollinger*. The ruling upheld the affirmative action admissions policy of the University of Michigan Law School. Barbara Grutter, a white woman with excellent grades and test scores, claimed she was denied admission because the law school used race as the main factor in deciding who to admit. The Court said the law school used race in an acceptable way to promote diversity. This passage from the majority opinion offers the Court's reasoning. (Page references to other cases have been removed to make the passage easier to read.)

### Document 1

*The Court endorses Justice Powell's view that student body diversity is a compelling state interest that can justify using race in university admissions. The Court defers to the Law School's educational judgment that diversity is essential to its educational mission. . . . Attaining a diverse student body is at the heart of the Law School's proper institutional mission, and its "good faith" is "presumed" absent "a showing to the contrary." Enrolling a "critical mass" of minority students simply to assure some specified percentage of a particular group merely because of its race or ethnic origin would be patently unconstitutional. But the Law School defines its critical mass concept by reference to the substantial, important, and laudable educational benefits that diversity is designed to produce, including cross-racial understanding and the breaking down of racial stereotypes. The Law School's claim is further*

*bolstered by numerous expert studies and reports showing that such diversity promotes learning outcomes and better prepares students for an increasingly diverse workforce, for society, and for the legal profession. Major American businesses have made clear that the skills needed in today's increasingly global marketplace can only be developed through exposure to widely diverse people, cultures, ideas, and viewpoints. High-ranking retired officers and civilian military leaders assert that a highly qualified, racially diverse officer corps is essential to national security. Moreover, because universities, and in particular, law schools, represent the training ground for a large number of the Nation's leaders, the path to leadership must be visibly open to talented and qualified individuals of every race and ethnicity. Thus, the Law School has a compelling interest in attaining a diverse student body.*

## Written Primary Source Document 2

### Information on Document 2

In 1995, the Supreme Court ruled in the case *Adarand Constructors, Inc. v. Peña*. This case involved businesses contracted to do work for the government. The Court set strict limits on when affirmative action programs could be used to award minority businesses such contracts. Supreme Court Justice Clarence Thomas wrote an opinion concurring with the Court's decision in this case. That is, he agreed with the decision, but he also added his own stronger views on affirmative action in general. This passage is from his opinion.

### Document 2

*That these programs may have been motivated, in part, by good intentions cannot provide refuge from the principle that under our Constitution, the government may not make distinctions on the basis of race. As far as the Constitution is concerned, it is irrelevant whether a government's racial classifications are drawn by those who wish to oppress a race or by those who have a sincere desire to help those thought to be disadvantaged. There can be no doubt that the paternalism that appears to lie at the heart of this program is at war with the principle of inherent equality that underlies and infuses our Constitution. . . . [T]here can be no doubt that racial paternalism and its unintended consequences can be as poisonous and pernicious as any other form of discrimination. So-called "benign" discrimination*

*teaches many that because of chronic and apparently immutable handicaps, minorities cannot compete with them without their patronizing indulgence. Inevitably, such programs engender attitudes of superiority or, alternatively, provoke resentment among those who believe that they have been wronged by the government's use of race. These programs stamp minorities with a badge of inferiority and may cause them to develop dependencies or to adopt an attitude that they are entitled to preferences.*

*In my mind, government-sponsored racial discrimination based on benign prejudice is just as noxious as discrimination inspired by malicious prejudice. In each instance, it is discrimination, plain and simple.*

## Study the Document: Written Source 1

*Instructions:* Take notes on these questions. Use your notes to discuss the documents and answer the DBQ.

### 1 Main Idea or Topic \_\_\_\_\_

This Supreme Court opinion found that “student body diversity is a compelling state interest that can justify using race in university admissions.” Explain what you think the Court means by “diversity” here and what point this sentence is making about this form of diversity.

### 2 Interpreting Meanings \_\_\_\_\_

The Court describes what it sees as right and wrong reasons for a school to enroll a “critical mass” of minority students. What does it mean by “critical mass,” and what are the right and wrong reasons for enrolling it?

The Court says diversity in schools will foster “cross-racial understanding and the breaking down of racial stereotypes.” What does this mean? Do you agree with the Court on this? Why or why not?

### 3 What Else Can You Infer? \_\_\_\_\_

What is suggested or implied in the document? For example, what kinds of things can you infer about the American economy and how it is changing? Why would these economic changes influence the Court’s thinking about racial diversity in colleges?

## Study the Document: Written Source 2

*Instructions:* Take notes on these questions. Use your notes to discuss the documents and answer the DBQ.

### 1 Main Idea or Topic

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Justice Thomas seems to sum up his main point in the *Adarand* case when he says “the paternalism that appears to lie at the heart of this program is at war with the principle of inherent equality that underlies and infuses our Constitution.” In your own words, explain what he means.

### 2 Interpreting Meanings

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Thomas calls affirmative action programs a form of “benign prejudice” or “benign discrimination.” What does he mean, and why does he feel this form of discrimination is as bad as any other form of discrimination?

### 3 Compare and Contrast

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Justice Thomas says affirmative action conflicts with the “inherent equality” protected by the Constitution. Look over the majority opinion in the *Grutter* case (Written Document 1). How would the Justices who supported that opinion answer Thomas on this point about “inherent equality”? What is your opinion about this?



# Comparing the Documents



## *The Written Sources*

Answer the question by checking one box below. Then complete the statements on the Comparison Essay worksheet. Use all your notes to help you take part in an all-class debate about these documents—and to answer the final DBQ for the lesson.

**Which of these primary source documents would be most useful to a historian trying to understand the debate about diversity in America today?**

*Part of the  
Supreme Court's 5–4 ruling  
in the 2003 case  
Grutter v. Bollinger  
upholding the affirmative  
action program of the  
University of Michigan  
Law School.*

*Document 1*

☐

*Supreme Court  
Justice Clarence Thomas's  
opinion concurring with  
the Court's decision in the  
1995 affirmative action case  
Adarand Constructors,  
Inc. v. Peña.*

*Document 2*

☐

## Comparison Essay

*I chose Document \_\_\_\_\_ because:*

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*I did **not** choose Document \_\_\_\_\_.*

*However, a historian still might use the document in the following way:*

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**Keep this in mind:** Some sources are very biased. A biased source is one that shows you only one side of an issue. That is, it takes a clear stand or expresses a very strong opinion about something. A biased source may be one-sided, but it can still help you to understand its time period. For example, a biased editorial cartoon may show how people felt about an issue at the time. The usefulness of a source depends most of all on what questions you ask about that time in the past.

# Document-Based Question

Your task is to answer a document-based question (DBQ) on recent debates about ethnic, racial, and other forms of cultural diversity. In a DBQ, you use your analysis of primary source documents and your knowledge of history to write a brief essay answering the question. Using all four sets of documents, answer this question.

## *Document-Based Question*

**“America is not better off for the way it has stressed ethnic, racial, and other kinds of group identity and pride in recent years.” Do you agree or disagree with this statement? Why?**

Below is a checklist of key suggestions for writing a DBQ essay. Next to each item, jot down a few notes to guide you in writing the DBQ. Use extra sheets to write a four- or five-paragraph essay.

- *Introductory Paragraph*  
Does the paragraph clarify the DBQ itself? Does it present a clear thesis, or overall answer, to that DBQ?
- *The Internal Paragraphs—1*  
Are these paragraphs organized around main points with details supporting those main ideas? Do all these main ideas support the thesis in the introductory paragraph?
- *The Internal Paragraphs—2*  
Are all of your main ideas and key points linked in a logical way? That is, does each idea follow clearly from those that went before? Does it add something new and helpful in clarifying your thesis?
- *Use of Primary Source Documents*  
Are they simply mentioned in a “laundry list” fashion? Or are they used thoughtfully to support main ideas and the thesis?
- *Concluding Paragraph*  
Does it restate the DBQ and thesis in a way that sums up the main ideas without repeating old information or going into new details?

# **Visual Primary Sources**



## First Group—Documents 1 & 2



Document 1

Sean Haley, Shutterstock Inc.



Document 2

Thomas M. Spindle , Shutterstock Inc.



## First Group—Documents 3 & 4



Funkenstien, Shutterstock Inc.



NorthGeorgiaMedia, Shutterstock Inc.