



May 19, 2021

Ruth Ryder
Deputy Assistant Secretary for Policy and Programs
Office of Elementary and Secondary Education
U.S. Department of Education (ED)
550 12th Street, SW
Washington, DC 20202

RE: Comment Request; Proposed Rule, Proposed Priorities - American History and Civics Education, Docket No. ED-2021-OESE- 0033

Dear Ms. Ryder:

This letter is sent on behalf of the Communities for Just Schools Fund (CJSF). Our 60 partner organizations' efforts to improve school discipline, climate, safety, and pedagogy span more than 31 states and have positively impacted **millions** of students, parents and educators. We are writing in response to the notice published in the Federal Register on April 28, 2021 regarding the proposed priorities for the American History and Civics Education programs, including the Presidential and Congressional Academies for American History and Civics (Academies) and National Activities programs, Assistance Listing Numbers 84.422A and 84.422B.

We write **in support of** the stated goals of supporting “the development of culturally responsive teaching and learning and the promotion of information literacy skills.” We recognize that the proposed goals are bold, necessary steps forward and critical to ensuring that education systems are rooted in equity and justice. We also note that at a time where there is legislative pushback in states and locales across the country, the work to create inclusive, supportive, and affirming educational environments that nurture critical thinking is even more urgent. Now is the moment for building and sustaining public education systems that prepare students for healthy and full lives.

Our Partners' Interest and Expertise

The Communities for Just Schools Fund's partners organize young people, parents and caregivers, educators, and other community members to advocate on behalf of students who are disproportionately impacted by suspensions, expulsions, arrests, corporal punishment, and erasure in schools. Their advocacy has shed light upon the fact that, in many places, there are far too many students who find themselves being policed and targeted for exclusion from their schools because of flawed school policies and practices *and* biased perceptions of them and their communities. These biases are further perpetuated by whitewashed curricula and conversation.

Their advocacy has been crucial in illuminating the need for and value of meaningful engagement with young people and their families, the lack of which exacerbates negative perceptions of young people and their communities. Their advocacy has required them to face off against those who introduce laws designed to silence anti-racist education efforts. Their advocacy has also evidenced how curricula and pedagogy that is void of culturally-affirming and sustaining practices becomes another form of policing, particularly intellectual, emotional, and psychological violence. CJSF partners have shown how this [*curricular violence*](#) manifests in classrooms and communities across the country.

Additionally, our partners invest in their communities by providing political and civic education, researching policies and practices, providing technical assistance to school districts, offering curriculum support and community for educators, and engaging in dialogue with elected and appointed officials. They create and sustain educational spaces where truth-telling is the cornerstone, where students pose justice-oriented solutions, and where student experience and expertise is at the helm of both content and pedagogy.

In most instances, our partners' efforts are local in focus *and* have national impact and reach. They organize community members to stand up for positive, healthy, and supportive school climates and model daily how critical consciousness is elevated in good organizing praxis and multi-directional learning. They work to demonstrate how holistically safe schools produce better academic and social outcomes than do schools with a heavy police and/or security presence, zero tolerance school discipline policies, and over-reliance on exclusionary discipline methods. Our partner organizations offer what is otherwise all too often limited space for Black and Brown students, students with disabilities, immigrant students and LGBTQ+ students, and their family members, to advocate for themselves and their school communities. Using their own lived experiences and the effort they invest in research, data collection, and political education, these groups are proactively working to shed light upon ways in which they have been harmed by hyper-punitive educational policies and practices. They are also actively identifying, proposing, and even helping to implement evidence-based alternatives grounded in belonging and love (e.g. restorative and transformative justice, peace and healing circles, conflict resolution, etc.) These alternatives slowly shift the needle towards just practices in schools and districts that place community and relationships at the center, not “division.”

Federal investments in efforts designed to “incorporate teaching and learning practices that reflect the diversity, identities, histories, contributions, and experiences of all students create inclusive, supportive, and identity-safe learning environments” would align well with CJSF’s partners efforts and demands.

How CJSF’s Partners are Pointing Us Towards Pathways to Liberatory Education

Curriculum often leaves out in-depth conversations and examinations about how current events are part of a long historical continuum. At a time where only 8-9% of class time is devoted to

Black history and Black history is often relegated to one month and a few heroic and misrepresented figures, classroom curricula too often erases the critical contributions and strategic organizing efforts of Black and Brown communities and allies.¹ Learning about the creativity and organizing of everyday, ordinary people encourages students and school staff to see how they can lead and be change makers. CJSF's partners' efforts are empirical evidence that culturally responsive-sustaining pedagogy is critical for fully activating and leaning into the levers of our democracy. Culturally responsive-sustaining pedagogy is aimed at working towards a more just and equitable society, including a society where those who have been most directly impacted and excluded by erasure in texts, curricula, and pedagogical practices see themselves represented in curricular content.

Numerous studies have shown the positive impact that culturally and linguistically responsive learning environments have on all students, particularly in building self-esteem, self and social awareness, and critical consciousness to create social change. Having opportunities to grapple and reckon with this nation's history allows students and staff to analyze how power imbalances perpetuate division, so that they may dream a path forward towards a world grounded in justice, love, and connection. Federal grantmaking that is supportive of such approaches would send an important message not only to state and district leaders but also to communities that have often labored without recognition to fill gaps in students' learning and development and to repair the harms caused when curriculum and teaching send students a clear message that they are not welcomed.

Examples of Our Partners' Efforts Towards Culturally Responsive Learning Environments

Work by our partners has led to greater understanding on the part of schools, communities, districts, and even state officials about harms perpetuated by flawed policies and practices - and in many instances has resulted in changes to these policies and practices. We strongly urge you to read CJSF's *Reclaim SEL: Centering Organizing Praxis for Holistically Safe Schools* [radical report](#) "radport" crafted in partnership with our national network of partners. The radport illuminates examples of social-emotional learning as critical consciousness-raising in organizing praxis. It also includes CJSF partner reflections that serve as evidence relevant to culturally responsive-sustaining curriculum, including "schools should be where young people learn about themselves and people's history as liberatory practice aimed at communal freedom."

We are also including several examples of our partners' work here. These examples all speak to the imperative for greater investment in and support for school practices to effectively accomplish your stated goals for teaching and learning practices:

“(a) Take into account systemic marginalization, biases, inequities, and discriminatory

¹ National Museum of African American History. (2015). *Research into the state of African American history and culture in K-12 public school.*

policy and practice in American history;

(b) Incorporate racially, ethnically, culturally, and linguistically diverse perspectives and perspectives on the experience of individuals with disabilities;

(c) Encourage students to critically analyze the diverse perspectives of historical and contemporary media and its impacts;

(d) Support the creation of learning environments that validate and reflect the diversity, identities, and experiences of all students; and

(e) Contribute to inclusive, supportive, and identity-safe learning environments.”

Coleman Advocates

In 2010, family and youth organizing group Coleman Advocates -- and a broad coalition of students, families, teachers and community -- organized and won a pilot Ethnic Studies course in five San Francisco High Schools. Since then, coalition members have worked together to evolve and expand the curriculum across the district. In advocacy efforts to expand Ethnic Studies into all SFUSD high schools, students consistently testified about their frustration at the absence of Black, Latinx and other historical and cultural figures from communities of color, and the dominance of white ones, in school curricula. That void, they said, made them feel excluded from what was being taught in most classes.² “It makes us feel invisible and like we don’t have any value,” said Alejandra Mendez-Ruiz, a former SFUSD student and Coleman youth leader. “Students in my Ethnic Studies class were way more attentive than in my other classes because we were learning about people that look like us and come from the places our families come from. When you walk into a class and see someone of your own background on the big projector instead of the same old Caucasian male as the hero, it makes you more curious and more excited about learning.”

SFUSD teachers also testified to the power of the curriculum, making the explicit link between Ethnic Studies and the school-to-prison pipeline. They talked about witnessing struggling students improve when they began to learn about their culture’s history – the achievements of the Black Civil Rights movement or the Chicano Movement, for example. Students became more invested in their education and felt more embraced by the school community, which had positive effects on the larger school climate.

At San Francisco’s Balboa High School, an Ethnic Studies course is used as an “early retention strategy” for outgoing middle school students identified as “at risk” of failing or dropping out. **Stanford University released findings from a controlled study in 2016 that revealed that**

² This case study is adapted from Communities for Just Schools Fund’s (2018) “*Do the Harder Work--Create Cultures of Connectedness in Schools: A Youth & Parent Organizer Response to the Federal Commission on School Safety.*” Available at cjsfund.org/do-the-work.

taking this ninth-grade Ethnic Studies course boosted the grades, attendance and course completion rates of participating students.³ The academic benefits of the course were so significant, the researchers who conducted the study said they were “shocked” by their own findings. “Schools have tried a number of approaches to support struggling students, and few have been this effective,” said Emily Penner, co-author of the Stanford report. “It’s a novel approach that suggests that making schools relevant and engaging to struggling students can really pay off.”⁴

Providence Student Union

Providence Student Union (PSU) is a youth-led organizing group working with high school aged students in Providence, RI. In 2016, PSU reviewed demographic data for their school district and the content of their high school curriculum. They discovered that 91 percent of Providence students were youth of color, but approximately 85 percent of their teachers were white and that the curriculum did not reflect students’ lives. In their words, “Without culturally relevant coursework, students struggle to see themselves in the material and as important voices in our world.” In response, PSU decided to create a campaign for Ethnic Studies in their schools. The district has made progress towards these goals. Most importantly, PSU members, operating as the “Ethnic Studies Task Force” meet with the district every few weeks to discuss the curriculum and its development. Their consistent advocacy helped push the district to hire a coordinator specifically for supporting Ethnic Studies and expand culturally relevant and responsive curricula for Providence’s 23,000 students.

Teaching for Change

Teaching for Change and Zinn Education Project are named in more than 15 states' bills to ban their resources that get at the heart of the Proposed Priorities in American History and Civics.

Teaching for Change launched a Freedom Reads: Anti-Bias Book Talk series, which is part anti-bias training and part book review. Each short segment explores anti-bias books for the home and the classroom to strengthen parents’ and teachers’ anti-bias, anti-racism lens, and their ability to critically analyze children’s media. Children’s books can be a starting point for young people to see how others understand emotions, talk about their feelings, and identify with social issues.

Zinn Education Project

The Zinn Education Project, coordinated by Teaching for Change and Rethinking Schools, offers free, downloaded lessons and articles for teachers to teach beyond the textbook. Many of these lessons include interactive activities like role plays and tribunals. To date, more than 130,000 educators are signed up to download free lessons. The current wave of legislative attacks on

³ Thomas S. Dee & Emily K. Penner, 2017. "The Causal Effects of Cultural Relevance," American Educational Research Journal, vol 54(1), pp 127-166. Available at <https://www.nber.org/papers/w21865>.

⁴ Brook Donald. (12 July 2016). “Stanford study suggests academic benefits to ethnic studies courses,” <https://news.stanford.edu/press-releases/2016/01/12/pr-ethnic-studies-benefits-011216/>

teaching people's history is in direct response to the growing number of educators committed to truth-telling. When the pandemic hit, Zinn Education Project created [Teach the Black Freedom Struggle online classes](#), a virtual mini-series to support educators in teaching about current events. The series covered the Black Freedom Struggle, which brought together hundreds of educators, young people, and organizers from across the country. These sessions featured a historian in conversation with an educator to discuss the historical context of topics like the Civil Rights Movement in the North, the Student Non-violent Coordinating Committee, and the historical roots of the 2020 rebellion. As part of the sessions, attendees left with both a deeper and more nuanced understanding of the topic, as well pedagogical strategies to use in their classrooms and communities.

Gwinnett SToPP

Gwinnett SToPP in Gwinnett County, Georgia has been using Facebook Live amidst COVID-19 to offer political education through a series called *Education System in Crisis*. One session, entitled *Still Separate and Unequal*, focused on disparities in education and addressed how school funding works as well as disparities in college readiness and Advanced Placement and honors course enrollment for Black and Brown young people.

In Sum

These partners' efforts are just a sampling of the thirst for and push towards culturally responsive learning that exists in communities across this nation. By investing in "teaching and learning that reflects the breadth and depth of our Nation's diverse history and the vital role of diversity in our Nation's democracy" ED will be contributing to the realization of Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, specifically "an ambitious whole-of-government equity agenda that matches the scale of the opportunities and challenges that we face." Thank you for providing us with this opportunity to comment. If you have any questions or concerns, please contact Jaime Koppel at jkoppel@cjsfund.org.

Sincerely,

Communities for Just Schools Fund

<http://www.cjsfund.org>