



August 13, 2023

Re: Vermont's IRIS Ethnic Studies Standards Framework

Dear State Board of Education Chair Jennifer Deck Samuelson and Board of Education Members:

Jewish Communities of Vermont is a non-profit which has been supporting Jews and Jewish organizations throughout Vermont, including advocating for their interests, since 2013.

We recommend that the changes below be made to the Vermont Ethnic and Social Equity Standards Advisory Working Group's ("Working Group") recommended "IRIS Ethnic Studies Standards Framework" ("Framework"):ⁱ

a. Revise "Vermont's Definition of Ethnic Studies" Sectionⁱⁱ to Comply with Act 1

In the second sentence of the first paragraph delete "and outside" so it reads:
"suffered...within the United States." (page 4)

In the third sentence of the second paragraph reword and add "as well as groups that have been historically subject to persecution or genocide" to align it with Act 1 so it reads:
"when we refer to Ethnic Studies Groups, it is in reference to (i) nondominant racial and ethnic groups in the United States including indigenous groups (with a special focus on the Indigenous People of Vermont, the Abenaki, Mahican, Pennacook, Pocomtuc, and others), Africans, Asians, Pacific Islanders, Chicanx, Latinx, or Middle Easterners, and additional people of color as well as (ii) groups that have been historically subject to persecution or genocide." (page 4)

These changes align the Framework to Act 1's statutory requirements:

Act 1, Section 1(b): "Definitions. As used in this act:

(1) "Ethnic groups" means:

- (A) nondominant racial and ethnic groups in the United States, including people who are Abenaki, people from other indigenous groups, people of African, Asian, Pacific Island, Chicanx, Latinx, or Middle Eastern descent; and
- (B) groups that have been historically subject to persecution or genocide."ⁱⁱⁱ

The Vermont Agency of Education's Act 1 Request for Proposal requires that the contract's output (i) incorporate Act 1's statutory lens, and (ii) "embody the broadest possible commitment to group inclusivity."



Note: In February 2019, Amanda Garces pressed the Vermont Legislature to not include clause (B) in Act 1. Sharing that this clause concerned her coalition, Garces stated that including teaching about these ethnic groups – people who had been subject to persecution or genocide – could result in students learning about antisemitism which could "punish" activists who push to boycott Israel.^{iv}

Soon thereafter, Garces was appointed Chair of the Working Group. In that role she drafted recommendations for the Working Group's consideration. In 2022, dismissing the Jewish Community of Vermont's objections and suggestions, the Working Group, a majority of whom were Garces' Education Justice Coalition appointees, approved her recommendation that the Education Quality Standards' definition of "Ethnic Group" exclude clause (B).

b. Remove references to consultant "Community Responsive Education" and its representatives

Delete "Community Responsive Education Consultants: Allyson Tintiangco-Cubales, Samia Shoman and Aimee Riechel" (page 1)

Delete ", in collaboration with Community Responsive Education," (page 3)

Community Responsive Education (CRE) is a private, fee-based Ethnic Studies consulting firm.

The State of Vermont should follow other States' examples and avoid promoting private, for-profit consulting firms to Vermont Superintendents, administrators and teachers who will receive the Framework. For example, in January 2022 State Superintendent of Public Instruction Chris Reykdal removed private, fee-based consultants from Washington State's Ethnic Studies materials noting that the groups he removed also advance political agendas. Similarly, the consultants retained to assist the California Department of Education prepare the CA Ethnic Studies Model Curriculum (ESMC) are not mentioned in the ESMC; it credits the California State Board of Education and Department of Education only.^v

Moreover, the State of Vermont need not promote private groups which push discriminatory materials. Vermont law requires schools to furnish students "educational services...in a nondiscriminatory manner"^{vi} and Vermont's Educational Quality Standards "prohibit discrimination against any student ... as a result of or based upon, ethnicity [and] religion."^{vii}

In 2019 the State of California rejected CRE representatives' Ethnic Studies content due to its biased, antisemitic, and anti-Israel content. See Appendix. CRE's Vermont consultants advance similar content in their private Ethnic Studies teacher trainings and writings.^{viii}



c. **Remove reference to political activist group “Education Justice Coalition”**

Delete: “The Education Justice Coalition responsible for appointing community members”
(page 1)

The reference to Education Justice Coalition (EJC), a group not recognized in Act 1 to work on this project, should be removed.

Act 1 calls for the Vermont Coalition for Ethnic and Social Equity in Schools to appoint some working group/advisory committee members. Act 1 does not mention the Education Justice Coalition (EJC):

Act 1, Section 1(d)(1): “Vermont Coalition for Ethnic and Social Equity in Schools (Coalition) shall appoint the 10 members who represent ethnic groups and social groups and the member identified under subdivision (c)(2) of this section. Appointments of members to fill vacancies to these positions shall be made by the Coalition.”^{ix}

If EJC in fact appointed Act 1 Working Group members, as it appears it did,^x the State of Vermont’s projects that EJC representatives informed (including the Framework) should be set aside and a new Working Group, that is constituted in accordance with Act 1, should be convened to complete these projects.

Moreover, EJC is an activist group with a pronounced anti-Israel bias. Interspersed in EJC’s social media posts on “building inclusive messaging for education justice” is anti-Israel messaging such as promoting Act 1 Working Group Vice Chair Mark Hage’s Vermonters for Justice in Palestine June 2023 march that denigrated Israel employing false narratives.^{xi} EJC’s social media posts are peppered throughout with anti-Israel commentary and events hosted by anti-Israel activist groups, including some for K-12 Ethnic Studies teachers and students.^{xii} (Hage is a well-known anti-Israel activist who led Vermonters for Justice in Palestine’s decade-long campaign to pressure Ben & Jerry’s to not sell its ice cream in Israel.^{xiii})



Finally, this EJC credit was added *after* the Working Group approved the Framework. It is not part of the Working Group's recommendation and was not shared with the public so it could not comment on this reference prior to the Working Group's vote.

Thank you for your careful consideration of our recommendations.

Very truly yours,

Rabbi Tobie Weisman, Executive Director, Jewish Communities of Vermont

Ted Molnar, President, Jewish Communities of Vermont

Matt Vogel, Executive Director, UVM Hillel

Rabbi Yizhok Raskin, Chabad of Vermont, Burlington

Rabbi David Edelson, Temple Sinai, S. Burlington

Rabbi Aaron Philmus, Ohavi Zedek, Burlington

Rabbi Jan Salzman, Ruach HaMaqom, Burlington

Rabbi David Fainsilber, Jewish Community of Greater Stowe

Rabbi Ellie Shemtov, Rutland Jewish Center

Rabbi Binyamin Murray, Chabad of Middlebury

Cantor Scott Buckner, Israel Congregation of Manchester

Rabbi Seith Daniel Reimer, Beth El, Bennington

Rabbi Amita Jarmon, Shir HeHarim, Brattleboro

Rabbi Donna Kirshbaum, Bethlehem Hebrew Congregation

Attachment

cc: Heather Bouchey, Interim Vermont State Secretary of Education



Appendix

The Vermont Agency of Education's October 2022 Request for Proposal for an Act 1 Working Group on Ethnic Studies' consultant called for bids from those (i) with expertise with similar projects, (ii) that will ensure that "the framework ...embody the broadest possible commitment to group inclusivity," and (iii) that "take into account parental concerns about religion." See *also* Act 1, Section 1(g)(1)(F) (2019) ("Duties of the Working Group...ensure that the basic curriculum [is] welcoming to all students and take into account parental concerns about religion or culture").

In November 2022, the Agency of Education awarded this \$50,000 contract to Community Responsive Education (Contract # 45131).

Community Responsive Education (CRE) is a private California Ethnic Studies consulting firm co-founded and led by Allyson Tintiangco-Cubales and Jeff Duncan-Andrade. Working in Vermont were Tintiangco-Cubales and her CRE consultants Aimee Riechel and Samia Shoman.

Controversial California Ethnic Studies Model Curriculum Draft

In 2019, Tintiangco-Cubales co-chaired the State of California's Ethnic Studies Model Curriculum (ESMC) Advisory Committee,^{xiv} an important State of California project that made national news immediately after her advisory committee's ESMC draft was released to the public for comment. (Vermont Ethnic Studies consultants Riechel and Shoman served on Tintiangco-Cubales' ESMC Advisory Committee.)

The reaction to Tintiangco-Cubales' ESMC draft was exceptionally negative and, within weeks, the State of California discarded her draft.

Among those displeased were (i) Governor Newsom who called Tintiangco-Cubales' draft offensive and publicly stated that her draft would never see the light of day in California,^{xv} (ii) the California State Board of Education (SBE) President Linda Darling-Hammond who added that it did not comply with California law or the SBE's project guidelines,^{xvi} (iii) the California legislature which in 2021 enacted guardrails to attempt to prevent its content from entering classrooms,^{xvii} and (iv) 19,000 Californians who submitted public comments.

Of great concern to the California Jewish community was that Tintiangco-Cubales' draft was rife with antisemitic and anti-Israel content including the trope that Jews control the media and the characterization of the anti-Jewish and anti-LGBTQ hate group the Nation of Islam as an "African American spiritual and religious tradition."^{xviii}

Tintiangco-Cubales' draft denigrated Israel as well as targeted Jews' right to self-determination there, their indigenous homeland, with favorable mentions of the Boycott, Divestment and Sanction Israel (BDS) movement, a movement whose aims are to deny Jews this right there, tagging BDS instead a social justice movement for students to study and advance during school.^{xix}



Moreover, in an Ethnic Studies curriculum designed to teach students about discrimination against minorities, Tintiangco-Cubales' ESMC did not list antisemitism among the eight types of hate it called out for study^{xx} -- despite the fact that antisemitism is the motivation behind 63% of our nation's religious-based hate crimes directed at the Jewish 2.4% of the population.^{xxi} Also, it did not offer content on Jewish Americans.

SBE President Linda Darling-Hammond aptly summed up the situation caused by Tintiangco-Cubales' work: an Ethnic Studies curriculum "should be accurate, free of bias, appropriate for all learners in our diverse state" so Tintiangco-Cubales' draft -- which "wades unnecessarily into the global debate over the Israeli-Palestinian conflict" -- must be "substantially redesigned."^{xxii}

Vermont's Ethnic Studies Frameworks Draft and Policy Recommendations

CRE's May 2023 Vermont Ethnic Studies Framework (Framework) draft presented to members of the Vermont Ethnic and Social Equity Standards Advisory Working Group (Working Group) included as teacher resources the controversial concepts that California discarded, later deleted from the Framework *after* the Agency of Education shared this draft with the public pursuant to a records request. (The Working Group Chair did not post this draft, which was discussed in agendized public sessions, for the public to access.)

The May 2023 draft Framework's recommended teacher resources included:

- i) the 2019 California ESMC draft that the State of California rejected,
- ii) an article that portrays teens' religious conversion to the Nation of Islam positively (Akom, "Reexamining Resistance as Oppositional Behavior: The Nation of Islam and the Creation of a Black Achievement Ideology"), and
- iii) a paper that encourages readers to advocate for anti-Zionism (Maira and Shihade, "Meeting Asian/Arab American Studies: Thinking Race, Empire and Zionism").

In August 2023, CRE's Vermont Ethnic Studies policy recommendations were shared publicly.^{xxiii} In it is a link to a Jefferson Union High School District presentation. Jefferson Union's Ethnic Studies course outline instructs teachers to teach students that "anti-Zionism" is a social justice movement around which students should build solidarity in class.^{xxiv} (CRE is Jefferson Union's Ethnic Studies consultant, providing services under a \$180,000 contract with the district.^{xxv} CRE and its representatives are involved with the Ethnic Studies work in the three other districts mentioned in its Vermont policy recommendations; Shoman and Riechel are employed by San Mateo Union and San Francisco Unified School Districts, respectively.)

As with BDS, anti-Zionists single out Jews' beliefs and aims for disdain and to deny Jews the same rights they advance for other groups -- self-determination and sovereignty in one's indigenous homeland. See Jewish Virtual Library. Almost a century ago, anti-Zionism was devised as a state-sanctioned, "legitimate" way to discriminate against Jews in the Soviet Union. Soon thereafter, anti-Zionism became a rationale to oppress, imprison, dispossess, and ethnically cleanse almost one million Jews in the Middle East and North Africa.^{xxvi} Today, United States anti-Israel activists advance anti-Zionism as an anti-racist, anti-settler colonialist political campaign based on narratives, not facts, with the same antisemitic intent as in the Soviet Union and Middle East decades ago.^{xxvii}



For a detailed description of the anti-Israel messaging that CRE representatives, including Samia Shoman, inject into K-12 Ethnic Studies teacher trainings see “Under the Radar: Ethnic Studies Activists Push Anti-Israel Content Into American Schools.”^{xxviii}

ⁱ [Standards Framework 6-30-2023 \(1\).pdf - Google Drive](#)

ⁱⁱ Working Group’s recommended Framework:

“According to the WG’s suggested revisions to the EQS, ‘Ethnic Studies’ is defined as is interdisciplinary, age appropriate and grade-appropriate curricula and programs dedicated to the historical and contemporary study of race, ethnicity, and indigenous peoples (including the Indigenous People of Vermont). This requires a critical examination of the experiences and perspectives of racial and ethnic groups and indigenous peoples that have suffered systemic oppression, marginalization, discrimination, persecution, and genocide within and outside the United States. ‘Ethnic Studies’ may involve a critical examination of these experiences and perspectives through the lens of the characteristics of social identity groups. The WG defined ‘Social Identity Group’ to mean a group of people who share common characteristics that shape their identity and promote a sense of unity. Including sex, sexual orientation, gender identification, disability, class, socio-economic status, or other characteristics and conditions that are innate, unchangeable, or fundamental to identity.

“Building on these definitions, this framework refers to Ethnic Studies Groups throughout the text. Ethnic Studies, from its inception in 1969, focuses on providing ‘safe academic spaces for all to learn the histories, cultures, and intellectual traditions of Native peoples and communities of color in the YUS in the first person and also practice theories of resistance and liberation to eliminate racism and other forms of oppression.” (San Francisco State University). In this framework, when we refer to Ethnic Studies Groups, it is in reference to Black, Indigenous (with a special focus on the Indigenous People of Vermont, the Abenaki, Mahican, Pannacook, Pocomtuc, and others). Asian Americans, Latinas/os/e’, and additional people of color.”

ⁱⁱⁱ <https://legislature.vermont.gov/Documents/2020/Docs/ACTS/ACT001/ACT001%20As%20Enacted.pdf>

^{iv} <https://legislature.vermont.gov/Documents/2020/WorkGroups/Senate%20Education/Bills/H.3/Written%20Testimony/H.3~Amand a%20Garces~Testimony-VT%20Coalition%20for%20Ethnic%20Studies%20and%20Social%20Equity%20in%20Schools~2-6-2019.pdf> (Garces: including this clause could “allow...abuses against marginalized people to occur” and “punish advocacy groups and activism promoting boycotts of Israel”) (February 6, 2019)

^v [Ethnic Studies Model Curriculum \(ca.gov\)](#) at pdf page 4.

^{vi} 16 V.S.A. Section 165(a)(7).

^{vii} <https://education.vermont.gov/sites/aoe/files/documents/eqs-final-revisions-updated-05-18-23%20.pdf> (approved by SBE May 2023).

^{viii} [Under the Radar: Ethnic Studies Activists Push Anti-Israel Content into Schools | CAMERA](#) (“Samia Shoman, who has Palestinian roots, is a leading anti-Zionist proponent among LESMCC consultants. ... she showed a map of the Middle East in which the name ‘Palestine’ appears, and the State of Israel is missing from the map”) and [Fight for Ethnic Studies Moves to K-12 Classrooms | Convergence \(convergencemag.com\)](#) (Tintiangco-Cubales co-wrote that “as soon as Islamophobic and Zionist organizations like the Antidefamation League (ADL), the Jewish Community Relations Center (JCRC) and the Simon Wiesenthal Center saw the inclusion of Palestine in the curriculum, they organized an aggressive campaign to sanitize the curriculum [and] the Department of Education approved a gutted, all-lives matter version”)

^{ix} [Draft Bill Template \(vermont.gov\)](#)

^x [Act 1 Organizing — Education Justice Coalition of Vermont \(edjcoalitionvt.org\)](#)

^{xi} [\(20+\) Facebook](#). See also EJC Facebooks posts:

- March 22, 2022 post “P is for Palestine”
- July 15, 2022 post “Zionism is a political ideology, not a race or a religion”
- September 19, 2022 post “Come out Wednesday to support Vermonters for Justice in Palestine. We need to ensure UVM students for justice in Palestine are not silenced.”
- October 13, 2022 post calling upon members to “support students in solidarity with Palestine and our collective ability to tell the truth” displaying a sign that says “that criticism of apartheid Israel is not antisemitism.”

^{xii} [\(20+\) Facebook](#) (posted on Education Justice Coalition Vermont’s Facebook page February 2021)

^{xiii} [We got Ben & Jerry’s to stop selling in Israeli settlements. Here’s how we did it | Mark Hage | The Guardian](#)

^{xiv} [List of Advisory Committee Members - Curriculum Frameworks & Instructional Materials \(CA Dept of Education\)](#)



xv [In face-to-face with Gov. Newsom, strong support for Jewish concerns \(jweekly.com\)](#)

xvi [California needs time to get ethnic studies curriculum right | EdSource](#)

xvii [Bill Text - AB-101 Pupil instruction: high school graduation requirements: ethnic studies. \(ca.gov\)](#) (see Section 51225.3(a)(1)(G)(vi))

xviii [Instructional Quality Commission Agenda - Instructional Quality Commission \(CA Dept of Education\)](#) (Agenda Item 2, Attachment 2 at pages 44 and 259).

xix [Instructional Quality Commission Agenda - Instructional Quality Commission \(CA Dept of Education\)](#) (Agenda Item 2, Attachment 4 at page 2).

xx [190729 Jewish Caucus Letter on Ethnic Studies Model Curriculum.pdf](#)

xxi [cde.ucr.cjis.gov/LATEST/webapp/#/pages/explorer/crime/hate-crime](#)

xxii <https://www.cde.ca.gov/be/pn/nr/yr19sberel01.asp> and <https://edsources.org/2019/california-needs-time-to-get-ethnic-studies-curriculum-right/617650>

xxiii [Vermont Ethnic Studies Framework: Recommendations for Policies](#)

xxiv [Ethnic Studies Course Proposal Form \(eboardsolutions.com\)](#)

xxv [jeffersonunion.agendaonline.net/public/Meeting.aspx?AgencyID=85&MeetingID=26253&AgencyTypeID=1&IsArchived=True](#)

xxvi <https://fathomjournal.org/soviet-anti-zionism-and-contemporary-left-antisemitism/> and <https://blogs.timesofisrael.com/raping-the-jews-in-egyptian-prisons/>

xxvii [Anti-Zionism | ADL](#)

xxviii <https://www.camera.org/article/under-the-radar-ethnic-studies-activists-push-anti-israel-content-into-american-schools/>