

August 30, 2019

To the honored members of the Board of Regents:

We, the undersigned, are professional educators; we serve in a variety of settings as teachers, principals, curriculum specialists, consultants, special education specialists, school psychologists, guidance counselors, and more. Our qualifications include master's and doctoral degrees in education or related fields from accredited colleges and universities, and state teacher's licenses or comparable credentials. We are also proud graduates of yeshivas — Jewish elementary and high schools that maintain distinctive academic programs incorporating both Judaic and general elements. As such, we are uniquely qualified to comment on the efficacy and value of yeshiva education from both a personal and professional perspective.

The trope of yeshivas' educational inferiority — repeated again and again in various media, to the exclusion of our own voices — is belied by our own academic and professional achievements. We condemn the bigotry and false stereotyping inherent in tarring an entire population and educational system with a single, derisive brush, and we deplore the calls for forcible cultural assimilation masquerading as concern for our betterment.

As yeshiva graduates with advanced training in diverse areas of educational theory and practice, we can state with confidence that yeshivas provide students across all levels of ability with enriching educational experiences that stimulate their cognitive, intellectual, practical, social, and moral development.

Many yeshivas demonstrably produce superb outcomes in general academic subject areas as well as Judaic ones. In a limited number of others, improvements in particular subject area may indeed be appropriate — something that is true of individual schools within every educational system, including the public schools held up as an ideal under the proposed "equivalency" regime. These improvements are most wisely effectuated not by naming and shaming of schools or via criminal sanctions against parents, but through innovative and culturally sensitive support, collaboration, and dialogue with educators and parents.

The level of governmental intrusion and control now proposed cannot be justified. It would abridge the educational and operational autonomy of all 1,800 nonpublic schools in New York, and would most heavily impact schools (like yeshivas) with distinctive educational characteristics — schools which can hardly pass a test of shallow, rigid correspondence to the curricular preferences and weekly schedule of the public schools, academic and pedagogical excellence notwithstanding.

Unthinkably, the proposed process for determining the relative worth of public and nonpublic school instruction foregoes objective assessments in essential academic subjects, relying instead on highly subjective and unpredictable on-site audits of nonpublic schools. The proposal lacks robust mechanisms for assuring the impartiality or cultural and subject-matter competency of the personnel conducting these high-stakes audits. Of at least equally great concern is the likelihood that a checklist-like audit will fail to adequately measure many of the advanced intellectual skills whose acquisition lies at the heart of yeshivas' unique educational model: dialectical learning, careful textual analysis, multi-lingual cognition, and critical thinking. Such audits are also unlikely to accurately capture the social and developmental value of interpersonal and self-regulation skills imparted by yeshivas.

In its refusal to employ objective assessment of actual student achievement and its insistence on dictating the design of instruction, the present proposal is both deeply flawed on its own terms and antagonistic to traditional Jewish schools in particular.

We urge you to reject it.

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