



February 15, 2021

Illinois General Assembly
Joint Committee on Administrative Rules

Dear Members of the Joint Committee on Administrative Rules:

The Association of Christian Schools International (ACSI) is the largest Protestant school association in the world and includes 48 member schools in Illinois. Our member schools in Illinois provide quality education to thousands of students with a strong focus on academic excellence and character formation. As such, these schools are an integral part of the local communities they serve and a leading contributor to the diversity of education options that advance the common good in the communities in which they exist. Families choose Christian schools and make considerable sacrifices in order to enjoy these diverse options which are simply not available in other schools.

Our private Christian schools in Illinois operate under independent accreditation standards that are separate in nature from the public school system; we have our own rigorous, research-based teacher certification and qualifications. However, many of our schools also maintain ISBE recognition and state certification for their teachers. We deeply care about everyone in the communities where we live and serve. Many of the students that graduate from our K-12 schools will go on to study education at the university level and become teachers in public schools here in Illinois, and many of our teachers will hold both private educator certifications as well as state teaching credentials.

ACSI understands that the legislature's Joint Committee on Administrative Rules (JCAR) will soon be facing a decision whether or not to ratify a new and amended version of teacher certification regulations being presented by the Illinois State Board of Education (ISBE). We urge the Committee to not ratify the new version of the teacher standards and instead direct the ISBE to re-evaluate and improve their proposal for updated teacher standards found in the Illinois Register, Title 23, Part 24 as *Culturally Responsive Teaching and Leading Standards for all Illinois Educators*.

A review of the ISBE's proposed amendments makes clear these suggested new standards are not educational best practices based on objective, scientific research but rather reflect the promotion of partisan social and political agendas. The proposed amendments go far afield from what normally would be considered academic standards and instead wander into the realms of politics, philosophy and even religious beliefs.

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For example, in Section A on “Self-Awareness” in the proposed amendments to teacher standards, item A-1 states that teachers will “value the notion ... that there is not one ‘correct’ way of doing or understanding something, and... is most often based on our lived experiences.” This type of statement is not related to academic preparedness or subject matter expertise, but is simply a popularized philosophical and religious position, sometimes known as relativism, repackaged as an educational standard.

Quite frankly, good educators still believe in facts and objective truths. Under these new proposed standards, it seems the government is trying to prevent teachers from even asserting that it is objectively “correct” to state that $2 + 2 = 4$ or that all people should be treated with dignity. We do not think there is a “lived experience” that validates disrespecting or bullying others because you may disagree with them on a political or cultural issue. The foundation of our nation was built upon the belief that as a people we held certain *truths to be self-evident*.

While one could go point by point through the proposed amendments to demonstrate other areas of obvious concern, we think that anyone who gives a fair reading to this document will recognize for themselves there is a noticeable shift from scholastic professionalism to political activism. New progressive philosophical frameworks, partisan catchphrases, and political assumptions are seen throughout the ISBE’s new amendments. These all may be legitimate political positions for people to consider advocating for themselves, but the state government has no business dictating what individual teachers must personally believe.

We highly value compassion, appreciate the different cultural contexts from which people come, and understand that different life experiences influence each person’s perspective. However, compassion, understanding, and the appreciation of each other’s experiences do not require the rejection of facts and objective truth. Our concern is that the ISBE’s new amendments conflate these things, thereby obscuring the parts of the existing regulations that represent relevant academic thought and agreed standards of professionalism. All of this seems needlessly influenced by partisan political agendas that have no place in the classroom.

The ISBE already dropped the word “progressive” from the text of their proposed amendments in response to wide public concern, but that really has not changed the sum and substance of their proposed amendments to these teacher standards. We agree with the concerns already expressed by others, that if these proposed amendments are enacted, they can be seen as coercing teachers, using licensure as leverage, to take a specific ideological stance on issues of the day that are being debated in popular culture. This would be a grotesque and embarrassing overreach of government into the realm of personal liberty and conscience. Are the former regulations really to be replaced with these?

An even more fundamental question remains for the Joint Committee on Administrative Rules: Should not JCAR’s goal be to ensure that any new regulations reflect an agreed and bipartisan standard of professionalism for such a critically important area as education? It seems to the watching world that a professionally objective set of

regulations would likely win that sort of support without the public outcry the ISBE has, wittingly or unwittingly, sparked. You, as committee members, have the opportunity to ensure that *teacher certification* is not seen as being hijacked by political interests. Teacher certification is not about making all teachers members of a party or ideologically submissive. It should be about ensuring that teachers are knowledgeable professionals who have the skills to educate.

In summary, we recommend that JCAR not ratify the ISBE's proposed amendments. We ask that you instead direct the ISBE to avoid political influence and to seek greater input to reflect professional standards that have acceptance by the wider community of educational professionals and Illinois parents.

Most sincerely,

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