

February 11, 2021

Paul O. Burns, Ed.D.
Deputy Chancellor for Educator Quality
Division of Public Schools
Florida Department of Education
via email

Dear Dr. Burns,

Thank you for the opportunity to review the proposed Florida State “Holocaust Education Standards and Benchmarks (FDOE Proposed Draft)” emailed to me on Feb. 4, 2021.¹ As an active member of the Expert Group selected and convened by the Florida Department of Education (FLDOE) and working since August 2020 on drafting such standards and benchmarks, I am deeply knowledgeable of the process undertaken in proposing these standards and benchmarks; aside from my own engagement with every step of the process, I personally authored our draft document’s introduction, meant as an orientation for readers to our informed approach to this task (a copy is appended to this letter). I am immensely proud of the work my colleagues and I produced, and so I was happy to be invited to comment on that work.

My excitement turned to shock and frustration, however, when I opened the document: this was not what our group of experts had labored months to produce! Rather, what you sent me is a hastily assembled Frankenstein-monster consisting of many—but not all—of our carefully and responsibly calibrated benchmarks and only two of our three proposed standards *mashed-up* with a series of ill-conceived, occasionally incorrect, and illegitimately solicited measures presumably proposed by a right-wing Evangelical group, “Proclaiming Justice to the Nations” (PJTN). PJTN was ostensibly founded to combat antisemitism in education, but their true agenda is to establish a foothold in the nation’s public schools to promote religious indoctrination and their selective, revisionist, conservative Christian conception of American history. PJTN has neither the expertise nor the credentials to propose Holocaust education standards and benchmarks for Florida or any other state for that matter: they have no formal Holocaust studies or professional education knowledge; their founder and spokesperson is a self-styled theologian whose educational qualifications arise from home-schooling her children.

And yet, in a press release dated Sept. 30, 2020, PJTN proudly announced that founder Laurie Cardoza-Moore had been “asked to assist Governor DeSantis’ Department of Education in the upcoming review of Holocaust standards and curriculum in the State of Florida.”² While it is true that the legislation allows the Commissioner of Education to consult outside groups, that input is limited to “any state or nationally recognized Holocaust educational organizations.”³ PJTN’s claims to recognition notwithstanding, it does not meet any standard as a Holocaust educational organization, and the FLDOE should not have solicited a proposal from an unqualified and uncredentialed body and, especially, should not have attempted to combine it with legitimately solicited and qualified input, particularly in such a non-transparent way.

¹ “Embargoed Holocaust Education Standards Final 2.4.2021 v1.”

² “PJTN: Taking back America’s Children’ Campaign Is Impacting the Future of Education in America on a National Level,” Press Release (Sept. 30, 2020), https://www.pjtn.org/20200930_alert. Accessed 23 Jan. 2021. This document has since been removed from the PJTN website.

³ See the 2020 Florida Statutes, Public K-12 Education, s. 1003.42(g), http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=1000-1099/1003/Sections/1003.42.html. Accessed 9 Feb. 2021.

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In fact, the Expert Group had seen elements of PJTN's proposal before, which is the basis for my assumption that the material under review here that we did not produce originated with PJTN. On October 27, 2020, the Expert Group received via email our own recently submitted draft benchmarks combined with "additional feedback and recommendations for Holocaust Education Standards" from an as-yet-unnamed source; several days later, we were informed these new elements were the work of PJTN. The document I was sent on Feb. 4 is strikingly similar to this previous misguided effort at combining two proposals, one legitimate, one illegitimate. We offered detailed feedback back then and rejected most of PJTN's proposed benchmarks, along with the ideology behind them, and so it is particularly troubling to find they have returned in the latest version.

But even if we were to ignore the illegitimate origins of the PJTN components, I would still reject the vast majority of them, because they are wrong and misguided in at least four ways:

1. PJTN's contribution inserts a series of benchmarks at the early elementary level requiring teachers to identify or explain the meaning and importance of Jewish symbols, holidays, and traditions, as well as the word "Jewish" itself. This would lead teachers to single out Jews for scrutiny in a manner all-too similar to the way Nazis required students in Germany to learn to recognize Jews. These proposed benchmarks would do the opposite of the legislation mandate leading to "an understanding of the ramifications of prejudice, racism, and stereotyping ... for the purposes of encouraging tolerance of diversity in a pluralistic society."⁴ They ignore the wide range of cultural and secular Jewish experience and, if implemented, would lead students to mistakenly believe that the only Jews to be persecuted and murdered by the Nazi regime were those who were religiously affiliated. Ironically, the proposed focus on Jewish religious practices and identity violates PJTN's own express rejection of "material which promotes one religion to the detriment of other religions."⁵
2. Instead of the Expert Group's more balanced, contextualized, grade- and curriculum-appropriate introduction of Jewish contributions to Florida and US history, PJTN's proposal makes elementary school Holocaust education into a crash course in two-thousand years of Jewish history, eliminating context and suggesting, among other errors, that 3rd grade students could properly learn about the Babylonian Exile, for example. PJTN's lack of expertise in public school curricula is glaring here and in many other places.
3. Surprisingly, for a religious group, PJTN's understanding of religion is woefully simplistic or nonsensical. The proposed grade 2 benchmark, "Identify world religions that consider Abraham as the Father" shows a profound ignorance about Abrahamic religions and why they are referred to as such; the proposed grade 6 benchmark clarification, "Students will recognize that Judaism is inclusive of other faiths" is simply baffling. And under a grade 7 benchmark to use "age-appropriate primary sources to explain how the Jews understood the Holocaust" (language borrowed, I will note, from the Expert Group's proposal), PJTN adds the inexplicable and inappropriate clarification, "Students will recognize that the systematic annihilation of the soul, of the God of Abraham and of

⁴ See s. 1003.42(g), op. cit.

⁵ See "PJTN Methodology to Eliminate Anti-Semitic, Anti-Judeo/Christian, Anti-American, Pro-Islamic Indoctrination of Students in Our Schools," https://d3n8a8pro7vhmx.cloudfront.net/pjtn/pages/87/attachments/original/1507236212/PJTN_K-12TEXTBOOKCAMPAINMethodology.pdf?1507236212. Accessed 9 Feb. 2021.

Judaism was experienced by Jews.” This is a blanket theological statement that has no relevance to K-12 public education standards. Once again, the work of non-experts is obvious.

4. Beginning in grade 8, the PJTN proposal adds a new standard, “Discuss the Cause, Course, and Consequence [sic] of the Holocaust,” which by itself does have some merits, though it should not have replaced the Expert Group’s proposed standard, “Through lessons from the Holocaust, describe how actions of individuals, groups, and nations can safeguard against genocide.” Still, I see the potential value of including additional benchmarks addressing the historical context of the Holocaust, particularly at the high school level. However, much of what PJTN added here consists of curricular recommendations—due to come later in the process—rather than sound, measurable and sequential core content knowledge and skills. Holocaust education should not be a laundry list of facts about the genocide of European Jewry that students and teachers must simply check off as completed.

The proposed benchmarks solicited from PJTN are deeply flawed and would, if implemented, lead to Holocaust distortion. Nowhere would students learn about the Christian roots of antisemitism; nowhere would they learn about the long history of Christian triumphalism and supersession and its negative impact on Christian-Jewish relations; nowhere would students learn that the majority of Nazi perpetrators were baptized Christians. If PJTN’s contributions were implemented, Florida public-school students would never learn that the majority of German Jews were thoroughly assimilated and indistinguishable from their non-Jewish neighbors prior to the rise of Nazism, because PJTN’s limited understanding of Jewish history and the Holocaust focuses erroneously only on religious Jewish identity.

I therefore strongly reject this unvetted and ill-conceived draft document. I implore the FLDOE to return to the Expert Group’s proposal and eliminate all traces of PJTN’s illegitimate and unqualified intervention once and for all. While I can only speak for myself, I believe that the Expert Group would be willing to meet and discuss with qualified and informed members of the FLDOE team our proposal and ways we could improve it. But not if the FLDOE continues to work behind the scenes—without transparency and without the Expert Group’s consent—to bring PJTN to the table, undermining our efforts and expertise. The FLDOE solicited the work and input of a group of experts; it would be appreciated if the Department and its leadership would listen to us.

Respectfully submitted,



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enclosure: “Introduction” to Expert Group Holocaust Education Standards & Benchmarks

Introduction to Expert Group Holocaust Education Standards & Benchmarks

Executive Summary:

- Since August 2020, an expert group has been tasked with creating new rigorous Holocaust Education Standards and Benchmarks that progress sequentially through relevant K-12 content covering the Jewish experience, tolerance education, antisemitism, and more.
- New benchmarks are organized under three new Holocaust education standards:
 1. Examine how prejudice, discrimination, stereotyping, and anti-Semitism contributed to the Holocaust.
 2. Through lessons from the Holocaust, describe how actions of individuals, groups, and nations can safeguard against genocide.
 3. Explain why remembrance is essential to understanding the lessons of the Holocaust.

Introduction:

In his opening statement at the meeting of the United States Holocaust Memorial Council on May 28, 1980, the late Nobel laureate and Holocaust survivor Elie Wiesel said,

In an age tainted by violence, we must teach this generation and those that follow the origins and consequences of violence. In a society of distrust, skepticism, and moral anguish, we must tell our contemporaries that whatever the answer it must grow out of human compassion and reflect man's basic quest for justice. The Holocaust was possible because the law was violated by the state itself and its principles distorted by its leaders. From the Holocaust we have learned that we are responsible for one another. We are responsible for the past and the future as well.¹

Forty years later, these words still resonate and set the agenda for Holocaust education.

The Holocaust, the systematic, state-sponsored destruction of Jews and Jewish life by the Nazi regime prior to and during World War II, was a watershed event in human history that irrevocably impacted our thinking about humanity, including but not limited to how we reflect on religion, war, society, ethics, morality, culture, and more. Antisemitism—both historical, Christian antisemitism and modern, racial antisemitism—was a necessary but insufficient cause for the Holocaust; the Holocaust exposed how even a modern nation-state could turn on innocent people whom its citizens and collaborators no longer saw as neighbors, as human. The Holocaust was an assault on Jews, Judaism, and Jewish identity, but it was more than that as well; learning about the Holocaust, its causes and its legacies, teaches us universal lessons about the world in which we live today. In light of recent increases in antisemitism, hate speech, and

¹ “Man’s Right to Be Remembered,” meeting of United States Holocaust Memorial Council, May 28, 1980, in *Against Silence: The Voice and Vision of Elie Wiesel*, edited by Irving Abrahamson (New York: Holocaust Library, 1985), 3:171; quoted in Menachem Z. Rosensaft, “In Memoriam: Elie Wiesel,” *Holocaust and Genocide Studies* 30, no. 2 (Fall 2016): 426, doi:10.1093/hgs/dcw048.

racially motivated violence, understanding the past along with its impact on the present and the future have become even more essential.

Twenty-six years ago, Florida was a pioneer among states legislating K-12 Holocaust education. But the mandate did not include or define the standards and benchmarks that would specify the core content knowledge public school students would acquire. In 2020 the Florida legislature in HB 1213 amended the original required instruction statute to provide such standards for teaching the Holocaust “in a manner that leads to an investigation of human behavior, an understanding of the ramifications of prejudice, racism, and stereotyping, and an examination of what it means to be a responsible and respectful person, for the purposes of encouraging tolerance of diversity in a pluralistic society and for nurturing and protecting democratic values and institutions, including the policy, definition, and historical and current examples of anti-Semitism, as described in s. 1000.05(7), and the prevention of anti-Semitism.”²

In August 2020, an expert group of educators and educational facilitators, representing expertise in public-school teaching, university instruction, museum and other Holocaust institutional education, and lay leadership, was tasked with creating appropriate standards and benchmarks in response to HB 1213. These standards would “specify the core content knowledge and skills that K-12 public school students are expected to acquire” and would need to “be rigorous and relevant and provide for the logical, sequential progression of curricular content that incrementally increases a student’s content knowledge and skills over time.”³

How would we meet these challenges? The consensus among Holocaust education experts is that the gory facts of genocidal mass murder are not appropriate content for K-4 students, and that watering down gruesome content with the aim of teaching it to younger students is at best undesirable and at worst pedagogical malpractice. The Holocaust itself is “far too complex for young children to understand;”⁴ the USHMM recommends teaching the Holocaust to grades six and above.⁵ Our expert group has therefore drafted a progression of educational benchmarks building up to age-appropriate teaching and learning about the details of the Holocaust, along with its antecedents and legacies, in context and as relevant to students today. These benchmarks, and the corresponding curricular content and resources to be identified, progress rationally and reasonably from general to specific core content and from less to more complex levels of cognition, organized under the three new Holocaust education

² See the 2019 and 2020 Florida Statutes, Public K-12 Education, s. 1003.42(g), http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=1000-1099/1003/Sections/1003.42.html. Accessed 28 December 2020.

³ See Florida Department of Education, “HB 1213 Holocaust Education Presentation 1 8132020.pdf,” presented at Expert Group Meeting 1, Aug. 13, 2020.

⁴ See Samuel Totten, “Should There Be Holocaust Education for K-4 Students? The Answer Is No.” *Social Studies and the Young Learner*, 12:1 (Sep-Oct 1999): 36-39, <http://www.socialstudies.org/sites/default/files/publications/yl/1201/120109.html>. Accessed 28 December 2020.

⁵ “Students in grades six and above demonstrate the ability to empathize with [individual eyewitness accounts](#) and to attempt to understand the complexities of Holocaust history, including the scope and scale of the events. While elementary age students are able to empathize with individual accounts, they often have difficulty placing them in a larger [historical context](#).” See <https://www.ushmm.org/teach/fundamentals/age-appropriateness>. Accessed 29 Dec. 2020.

standards detailed above in the executive summary. In the younger grades, these preliminary building blocks take the form of prejudice and discrimination reduction, appreciation of diversity, and the inculcation of values such as tolerance and respect. Without these pre-Holocaust education benchmarks, younger students will not have the necessary tools to recognize and learn to prevent antisemitism and other forms of racism, intolerance, and disrespect.

Inculcating core values such as empathy and respect is not, however, an opening for religious education, which has no place in the public school curriculum. The Holocaust was perpetrated against Jews, and K-12 students in Florida will therefore learn about Jewish people past, present, and future. We advocate teaching and learning about Jews and Jewish life as historical facts in the context of the diversity of America's multifaith, multiethnic society and as preludes to learning about the Holocaust. But we do not advocate for religious education. An over-emphasis on Jewish doctrine and practice may lead to the mistaken impression that only religious Jews were victims or, worse, that—as Christian antisemitism would teach—Jewish religion brought on the Holocaust. Nazism was ultimately an anti-religious phenomenon, not only an anti-Jewish one. The Holocaust was—*and is today*—not about or relevant to Jews only. If Florida students learn only the Jewish historical experiences of racism, xenophobia, persecution, and genocide and are never taught the universal lessons of respect, tolerance, and loving the “other,” we will have failed. “Never again,” if it is to mean anything, must mean that such things should never again happen to any human being. As Elie Wiesel wrote in the epigraph above, “From the Holocaust we have learned that we are responsible for one another.” The Holocaust education standards and benchmarks we are proposing for the state of Florida will ensure that all of our children, from the youngest grades through high school, will learn these critical lessons.