



To the Members of the Georgia Professional Standards Commission,

We, the undersigned members of the Georgia Coalition for Education Justice, an organization of more than 200 students, parents, educators, and administrators, and advocates dedicated to advancing educational equity for all children across Georgia, write to oppose the proposed amendments to rules [505-3-.13](#), [505-3-.14](#), [505-3-.19](#), [505-3-.48](#), [505-3-.51](#), [505-3-.59](#), [505-3-.66](#), [505-3-.77](#), [505-3-.82](#), [505-3-.96](#), and [505-3-.100](#).

The Professional Standards Commission (“Commission”) is charged to attract the highest possible number of qualified personnel to become educators in Georgia; promote the hiring of qualified educators from other states to work in Georgia schools; and improve the level of preparation of educators, both pre-service and in-service, by requiring for purposes of certification those essential skills and that knowledge needed to deliver effective education.¹ The proposed changes run counter to these goals. First, these proposed changes will make schools less welcoming and supportive, while hindering current and future teachers’ ability to effectively instruct all of Georgia’s diverse students. Secondly, the proposed changes may exacerbate recruitment and retention challenges facing our state, particularly with regard to educators of color. Finally, the elimination of diversity, equity, and inclusion (“DEI”) and culturally responsive practices from educator preparation standards may threaten access to federal funding. For the aforementioned reasons, we urge the Commission to reject these changes and instead increase access to high-quality education through bolstering training in DEI as well as in principles of culturally-sustaining pedagogy and practice.

We also write to formally request public comment on the aforementioned rules during the upcoming June 8th meeting of the Georgia Professional Standards Commission in accordance with O.C.G.A §50-13-4 (a)(2) which provides that “In the case of substantive rules, opportunity for oral hearing *must be granted* if requested by 25 persons who will be directly affected by the proposed rule, by a governmental subdivision, or by an association having not less than 25 members.”

The Proposed Rule Changes Will Likely Diminish School Climate and Decrease Academic Achievement

The Commission has historically agreed and passed standards that defined and embraced DEI concepts since 2016.² A focus on these concepts allows schools to build learning environments and climates where students, families and their teachers feel like they belong and are respected, valued and supported. When students perceive that their teachers were incorporating their background, identities and social context into the curriculum, they reported greater interest in school, feelings of belonging and more acceptance of others.³ Incorporating DEI in educator preparation standards supports the creation of positive school climates, which contribute to overall school success, social-emotional wellbeing for students and staff and improved academic outcomes.⁴ Across the nation, public education

¹ Official Code of Georgia §20-2-982

² Georgia Professional Standards Commission Rule 505-3.01

³ Byrd, C. M. (2016). Does Culturally Relevant Teaching Work? An Examination From Student Perspectives. *SAGE Open*, 6(3). <https://doi.org/10.1177/2158244016660744>

⁴ Reynolds, K.J. et al. (2017). How Does School Climate Impact Academic Achievement? An Examination of Social Identity Processes. *School Psychology International*, 38(1), 4-6. <http://dx.doi.org/10.1177/0143034316682295>



systems that have embraced and implemented DEI concepts into their operations have seen incredible success both in terms of student academics and engagement.⁵

For instance, research shows that an academic benefit of culturally relevant teaching is not limited to English and humanities courses, but also improves student achievement in math and science.⁶ Moreover, students who engage the ideas of people from diverse groups demonstrate higher order critical thinking skills.⁷ Ensuring that educators are prepared to serve a diverse student body and implement culturally relevant curriculum allows students of marginalized groups to challenge negative group stereotypes and develop more empowering counter-narratives of themselves, school and society.⁸ Finally, culturally relevant curriculum mitigates the negative impact of discrimination among students and diminishes disciplinary infractions, especially for Mexican-American and African American male adolescents.⁹

Thus, the deliberate removal of key concepts that equip educators with the training and guidance necessary to support diverse, equitable and inclusive learning environments, and proactively work to eliminate bias and embrace cultural competency denies opportunities for Georgia's students and families to receive a high-quality public education tailored to the needs of the child. These competencies are also essential to preparing Georgia's students to compete in a global economy. We ask that the Commission prioritize the needs of Georgia's students, the majority of which are students of color and will be directly impacted by this proposal.¹⁰

The Proposed Rule Changes will Diminish Educators' Capability to Effectively Teach Diverse Students

We are deeply concerned about the proposed amendments replacing the word "diverse" with "difference" or "unique". These words are not defined in the Educator Preparation rules, and we fear that this, combined with the erasure of the previous definition of diversity which included many of the

⁵ Groundwater, S., Becker, B., Jiang, F., Gitter, J., Nuland, L., & Ewaida, M., (2022). 2022 State of Diversity, Equity, and Inclusion in Public Schools Report. Hanover Research. <https://www.hanoverresearch.com/reports-and-briefs/the-current-state-of-diversity-equity-and-inclusion-in-k-12-public-schools/?org=k-12-education>.

⁶ Rodriguez, J. L., Jones, E. B., Pang, V. O., & Park, C. D. (2004). Promoting Academic Achievement and Identity Development among Diverse High School Students. *The High School Journal*, 87(3), 44–53. <http://www.jstor.org/stable/40364295>

⁷ Pascarella, E. T., Palmer, B., Moye, M., & Pierson, C. T. (2001). Do diversity experiences influence the development of critical thinking?. *Journal of College Student Development*, 42(3), 257-271

⁸ Dunn, A. H., Neville, M. L., & Vellanki, V. (2022). #UrbanAndMakingIt: Urban Youth's Visual Counternarratives of Being #MoreThanAStereotype. *Urban Education*, 57(1), 58–82. <https://doi.org/10.1177/0042085918798065>

⁹ Umaña-Taylor, A. J., Wong, J. J., Gonzales, N. A., & Dumka, L. E. (2012). Ethnic identity and gender as moderators of the association between discrimination and academic adjustment among Mexican-origin adolescents. *Journal of adolescence*, 35(4), 773–786. <https://doi.org/10.1016/j.adolescence.2011.11.003>;

Wright, B. L. (2022). "Black Boys Matter: Strategies for a Culturally Responsive Classroom." NAEYC. <https://www.naeyc.org/resources/pubs/tyc/apr2019/strategies-culturally-responsive-classroom> ;

Bottiani, J. H., McDaniel, H. L., Henderson, L., Castillo, J. E., & Bradshaw, C. P. (2020). Buffering Effects of Racial Discrimination on School Engagement: The Role of Culturally Responsive Teachers and Caring School Police. *The Journal of school health*, 90(12), 1019–1029. <https://doi.org/10.1111/josh.12967>

¹⁰ <https://www.gadoe.org/External-Affairs-and-Policy/communications/Pages/Quick-Facts-on-Georgia-Education.aspx>



individual and group differences which are present in Georgia classrooms, creates ambiguity and will leave teachers ill prepared to teach students with identities that they do not share. We are also concerned by the striking of language encouraging teachers to confront their “bias.” Removing the word and our commitment to address bias does not eliminate its reality. There is no evidence which suggests that Black students misbehave more than their peers, yet they are persistently over-represented in school suspensions, expulsions, corporal punishment and other forms of school discipline in Georgia.

In fact, a July 2019 report by the U.S. Commission on Civil Rights noted that “students of color as a whole, as well as by individual racial group, do not commit more disciplinable offenses than their white peers – but Black students, Latino students, and Native American students in the aggregate receive substantially more school discipline than their white peers and receive harsher and longer punishments than their white peers receive for like offenses.¹¹ More specifically, the Governor’s Office for Student Achievement has reported the disproportionate disciplining of English learners, boys, Black children, and students with disabilities in Georgia classrooms.¹² This underscores the need for bias training in our educators, not its withdrawal.

The Proposed Rule Changes Will Likely Have a Dampening Effect on Recruiting and Retaining Diverse Educators

Retreating from our explicit commitment to diversity, equity, and inclusion in our educator preparation programs will hurt students and educators. Georgia’s teacher workforce is becoming increasingly diverse.¹³ This is a promising trend because we know that students have shown higher academic achievement when they have teachers who reflect their own identities. Eliminating language on DEI will also worsen our teacher shortage.¹⁴ This change will deter college students who come from these diverse backgrounds from pursuing teaching as a profession. When they see that their experiences are not reflected and valued in the profession, they are likely to seek different professional opportunities. Georgia will shrink its pool of future teachers and those most impacted are likely to be the one most in need. This means that our educational leaders, such as administrators and superintendents, must also be well versed in DEI practices to effectively support and retain their educators. Removing the language that is also inclusive of our diverse educator population, lowers the bar to which we hold all our educators. If administrators are not prepared to support an increasingly diverse faculty, we will continue to see increased burnout and turnover.

The Proposed Rule Changes May Violate Federal Anti-Discrimination Law and Threaten Access to Federal Funding

¹¹US Commission on Civil Rights. (2019). Beyond Suspensions: Examining School Discipline Policies & Connections to the School-To-Prison Pipeline For Students of Color with Disabilities. <https://www.usccr.gov/pubs/2019/07-23-Beyond-Suspensions.pdf>.

¹² GOSA. (2022). K-12 Discipline Dashboard.

¹³ University of Georgia (2022) Teacher Burnout Report. Accessible at <https://www.gadoe.org/External-Affairs-and-Policy/communications/Documents/Teacher%20Burnout%20Task%20Force%20Report.pdf>

¹⁴ See University of Georgia (2022)



Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in the programs or activities of all recipients of Federal financial assistance. The removal of concepts related to diversity, equity and inclusion may strip educators, and therefore schools and districts, of a critical tool used to address racial disparities and provide equal educational opportunities in Georgia’s public schools. The proposal is a thinly veiled attack on diverse, inclusive learning and is a clear outgrowth of efforts to ban discussions of race in the classroom and could lead to racially hostile learning environments and other potential violations of Title VI.

Furthermore, the American Rescue Plan (ARP) provided more than \$4.2 billion to Georgia to support schools in safely reopening and sustaining safe operations of schools while meeting the academic, social, emotional, and mental health needs of students resulting from COVID-19, about half of which remains unallocated.¹⁵ Federal law mandates that a minimum 20% of those funds be allocated to address learning loss and “the disproportionate impact of COVID-19 on student subgroups (each major racial and ethnic group, children from low-income families, children with disabilities, English learners, gender, migrant students, students experiencing homelessness, and children and youth in foster care).”¹⁶ The Georgia Department of Education made assurances to the U.S. Department of Education that the state would meet this and other conditions directly connected to equitably serving diverse student populations. Removing DEI and related concepts from educator preparation standards directly implicates the state’s ability to successfully execute the grant requirements and could lead to significant fiscal loss.

Recommendations

- Reject the proposed changes that eliminate definitions and use of “diversity”, “equity” “inclusion” “bias” and “cultural”.
- Develop additional language within these rules to ensure that educators not only recognize diversity, work in a manner that is equitable, and ensure that all students are included, but also that they work to actively incorporate culturally sustaining principles aimed at supporting, fostering, and sustaining each and every student’s cultural and linguistic background.

We would recommend that the Commission reject these changes, by voting NO to the proposed amendments and stand firm in our commitment to serving the diverse children and families of Georgia.

For questions, please contact Mikayla Arciaga at mikayla.arciaga@idra.org

The Georgia Coalition for Education Justice, coordinated by IDRA, is a coalition of students, educators, parents, and advocates committed to advancing education justice for all children across the state.

Signed

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¹⁵ <https://oese.ed.gov/offices/education-stabilization-fund/elementary-secondary-school-emergency-relief-fund/stateplans/>

¹⁶ https://oese.ed.gov/files/2021/03/ARP-ESSER-Grant-Award-Assurances_FINAL2.pdf



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