

Mia Howerton
U.S. Department of Education
400 Maryland Avenue SW
Room 3C152
Washington, DC 20202

May 19, 2021

Re: Docket ID ED-2021-OESE-0033

Dear Ms. Howerton:

I write as one member of the U.S. Commission on Civil Rights, and not on behalf of the Commission as a whole, to express my opposition to “Proposed Priorities – American History and Civics Education”.¹

In *Proposed Priority 1 – Projects That Incorporate Racially, Ethnically, Culturally, and Linguistically Diverse Perspectives into Teaching and Learning*, the proposed rule cites the 1619 Project and Ibram X. Kendi as inspirations for these new approaches to history and civics.

The 1619 Project is not a work of history. It is a work of propaganda. The person who is the animating force behind the 1619 Project, Nikole Hannah-Jones, has stated as much.

I’ve always said that the 1619 Project is not a history. It is a work of journalism that explicitly seeks to challenge the national narrative and, therefore, the national memory. The project has always been as much about the present as it is the past.²

If the woman who started the 1619 Project agrees that it is not history, why is the Department of Education encouraging schools to incorporate it into their curriculum? Does the Department *want* American students to believe “facts” that are not true?

The 1619 Project states as fact many things that are not true and in other cases ignores important events and context. In the 1619 Project’s introductory essay Hannah-Jones writes, “More than any other group in this country’s history, we have served, generation after generation, in an overlooked but vital role: It is we who have been the perfecters of this democracy.”³

This statement is contrary to historical fact. Lucas Morel, professor at Washington & Lee University, wrote about Hannah-Jones’s essay introducing the 1619 Project:

¹ 86 FR 20348.

² Becket Adams, *1619 Project founder claims her project is simply an ‘origin story,’ not history*, WASHINGTON EXAMINER, July 28, 2020, <https://www.washingtonexaminer.com/opinion/1619-project-founder-claims-her-project-is-simply-an-origin-story-not-history>.

³ Nikole Hannah-Jones, *Our democracy’s founding ideals were false when they were written. Black Americans have fought to make them true*, N.Y. TIMES MAGAZINE, Aug. 14, 2019, <https://www.nytimes.com/interactive/2019/08/14/magazine/black-history-american-democracy.html>.

The strangest thing about the essay is the claim that transplanted Africans and their descendants were the key to American greatness. Hannah-Jones cites no African principles of self-government or ideals of humanity when she quotes the famous pronouncements of the Declaration of Independence. She merely asserts that “black Americans, as much as those men cast in alabaster in the nation’s capital, are this nation’s true ‘founding fathers.’”

Ironically, however, even in this warped retelling, black Americans’ principal means of saving white Americans from their worst selves was not anything African but the quintessentially American ideals of human equality and natural rights.⁴

Clayborne Carson, a professor of history at Stanford who was chosen by Coretta Scott King to oversee the publication of Martin Luther King, Jr.’s papers, commented that the idea of human rights was an Enlightenment ideal that originated with white men. Black people became aware of this discussion and these ideas and said, “well, we have rights too.”⁵ But as Morel said, these ideas originated from Western (in this case, specifically American) culture and were then adopted by black Americans. There is nothing “African” about these ideas.

There are far too many flaws in the 1619 Project to recount here, but clearly the Department of Education is well aware of these errors and omissions. This again raises the question: Why does the Department want American students to be taught “facts” that are not true?

The incorporation of Ibram X. Kendi’s “anti-racist” ideology into history and civics curriculum is similarly problematic. The proposed rule states:

According, schools across the country are working to incorporate anti-racist practices into teaching and learning. As the scholar Ibram X. Kendi has expressed, “[a]n antiracist idea is any idea that suggests the racial groups are equals in all their apparent differences – that there is nothing right or wrong with any racial group. Antiracist ideas argue that racist policies are the cause of racial inequities.”⁶

There are many problems with this approach, but here are just two. Kendi said the following in an interview:

Q: One of the concepts from your work that I find most powerful is the way you call on us all to re-examine our understanding of cause and effect. You write that “racist policies are the cause of racial inequities” and that “policies determine the success of groups.” What does that mean for education? Where, for example, people talk about a racial “academic achievement gap” or disparate discipline rates for Black students?

⁴ Lucas Morel, *America Wasn’t Founded on White Supremacy*, National Ass’n of Scholars, <https://www.nas.org/blogs/article/america-wasnt-founded-on-white-supremacy>.

⁵ Tom Mackaman, *An interview with historian Clayborne Carson on the New York Times’ 1619 Project*, World Socialist Web Site, Jan. 15, 2020, <https://www.wsws.org/en/articles/2020/01/15/clay-j15.html>.

⁶ 86 FR 20349.

A: So let's say for instance, if you're a wealthier parent – and most people of wealth are disproportionately white – and let's say in your city, a single test determines who gets into a prestigious public high school. And let's say you have the resources to hire a personal tutor for your child, which will boost their score on that test, and make it easier, obviously, for them to get into that school. And then somebody comes along and says, “Hey, it's a problem that Black and Latinx kids are underrepresented in that school. And maybe it's because of the test.” You have a built-in advantage. And so you are going to – many people, unfortunately – are going to support that policy that benefits their children.

And then they're going to argue that, well, “If only those Black and Latinx kids would work harder” – in other words, they're going to articulate racist ideas to defend that racist policy. And that's typically how racist policies and the defense of those policies lead to racist ideas.⁷

Kendi steals several bases here. First, he starts by framing this hypothetical in terms of wealth, and then moves from wealth to race. Yet the real-life schools that are the closest analogs to his hypothetical are New York City's specialized high schools, such as Stuyvesant and Brooklyn Tech. The student bodies of those schools are not predominantly wealthy whites – they are predominantly poor Asians. Yes, there is a single high-stakes test that determines admission to these competitive high schools. By Kendi's reasoning, then, the test must be racist – but it is not racist in favor of whites, but in favor of Asians.

Second, Kendi's theory denies all human agency. It discounts the probability that if black, Hispanic, and white children studied as much as Asian children, more of them would be admitted to Stuyvesant. For example, if a white child is admitted to Stuyvesant and another white child is not, it is at least possible that the second white child might have been admitted if he had studied harder. Kendi's dispiriting approach teaches children that they have little control over their futures. After all, why study hard if everything is racist and you won't succeed anyway?

Lastly, both the 1619 Project and Kendi's anti-racism project introduce more racial division into our country. The 1619 Project deliberately minimizes the contributions and cultures of white Americans and magnifies and romanticizes the contributions and culture of black Americans. Ironically, in this way it's the inverse of the longtime failure of texts to describe or even acknowledge the historical contributions of blacks. “Anti-racism” teaches students that any racial disparity in *anything* (except perhaps when blacks and Hispanics have an edge) is due to a racist policy. As there is nothing in this world in which outcomes are precisely equal across all racial groups, the conclusion is that everything is racist. This is a formula for animosity between the supposed oppressor groups and the supposed victim groups.

The Department of Education should not adopt this proposed rule.

Sincerely,

⁷ Rebecca Koenig, *How to Be an Antiracist Educator: An Interview with Ibram X. Kendi*, EdSurge, Dec. 1, 2020, <https://www.edsurge.com/news/2020-12-01-how-to-be-an-antiracist-educator-an-interview-with-ibram-x-kendi>.

A handwritten signature in black ink, appearing to be 'P. Kirsanow', with a long horizontal stroke extending to the right.

Peter Kirsanow
Commissioner