



February 7, 2018

Professional Educator Licensing and Standards Board
1500 Hwy 36 West
Roseville MN 55113

Re: Proposed rule mandating cultural competency training for teachers

Dear PELSB Board and Staff:

The proposed rule risks imposing a government-mandated understanding of cultural competency while also completely overlooking religion as a profoundly important aspect of cultural development. Let me explain why I believe the rule, as written, must not be approved, but, first, a note about my credentials.

I have worked professionally with international students at the University of Minnesota for over 32 years, and am, thus, attuned to the need for understanding the diverse cultural perspectives that human beings bring with them. In 2005 I received a PhD in international education at the University of Minnesota where my emphasis was in intercultural studies. From 2008 until 2014 I taught an undergraduate course at the University of Minnesota on religion and educational policy. Some of my students are now lawyers and education policymakers here in Minnesota. I should note that for the past three years I have taught an online course on comparative worldviews, with students literally from around the world. And, finally, for the past nine years, through my work as executive director of Wilberforce Academy, I have been training international graduate students how to solve problems in their very diverse home societies.

When I conducted research for my PhD, one of my research findings was that highly religious international students (mostly graduate students) at the University of Minnesota felt that their religious perspectives and conversations were dismissed by their professors. In other words, a central part of their identity was rejected by the academics who otherwise shaped them, professionally and otherwise.

In the same way, Minnesotans who hold deeply religious perspectives, whether Muslims, Jews, Buddhists, Hindus, or Christians, will perceive that what many of them consider a core dimension of their identity is simply ignored by those who have crafted this rule. Furthermore, by failing to account for religious diversity in this proposed rule, you have ignored one of, if not the most salient, issues that faces Minnesota educators: how to educate students from

religiously and philosophically-diverse backgrounds. I am, frankly, baffled that you would overlook such a large factor in human development, but perhaps that owes to the widespread, but faulty notion that religion is private, and rarely public. If so, may I assure you that such assumption is not only faulty, but is itself a product of Western ethnocentric philosophers (for example, Immanuel Kant)?

My other concern about the rule concerns the way that it implicitly fosters a government-mandated perspective, or viewpoint, on, for example, gender identity and racism. The language utilized in the proposed rule certainly lends itself to the assumption that such training is expected to come through a social justice, or critical theory framework. That framework is not neutral, but, rather, carries the weight and import of a religion, or worldview.

If I am correct in this assumption, then the proposed rule is a potential violation of the First Amendment which states that government will not establish a religion (which could be understood as a particular viewpoint or worldview). In reality, courts have consistently ruled that education in America must be viewpoint neutral. While I absolutely agree that Minnesota's educators and their students need to understand diverse cultures and interpretations, we must ensure that they are not forced to endure training that does not recognize and allow for legitimate differences. I know that many critical theorists would detect "implicit bias" in my comment, but the reality is that we all must be faithful to our own consciences which government has no right or obligation to coerce.

I believe the rule, as written, is highly problematic and thus deserves to be rejected. But, if you insist on the proposed language, I ask that you include a statement both acknowledging that religion is one of the markers of human identity and that educators' consciences must be respected. The revised rule, thus, must also indicate that PELSB, as a government agency, will not impose any particular viewpoint with respect to these important and necessary matters of cultural diversity.

Sincerely yours,

Robert Osburn, PhD
Executive Director