

May 9, 2022

Commissioner Betty A. Rosa  
State Education Department  
89 Washington Avenue  
Albany, New York 12234

**COMMENTS IN OPPOSITION TO PROPOSED RULE ID# EDU-13-22-00025**

Dear Commissioner Rosa:

As both licensed mental health professionals and yeshiva graduates, we wish to comment on the proposed revised guidelines and share our positive collective experience with yeshiva education.

The narrative that yeshiva education is inadequate for professional success is simply not true; our education enabled us to successfully complete college and graduate school, and for some of us, doctoral level training. Our experience has been that general studies at a high level are indeed taught in our yeshivas. Further, Judaic studies are not a mere distraction from education as portrayed by the new guidelines. On the contrary, skills learned in Judaic studies have directly contributed to our academic success, including but not limited to ability to analyze text-based documents, linguistic skills from learning two or more second languages, writing skills, logical reasoning, legal process, Jewish history and civics, and more. This is in addition to the ethical and moral framework they imbue: if you need a tire changed, emergency medical care, a donation, a hot meal, a monetary loan, professional mentoring, a referral, or a place to sleep — our flourishing network of volunteer social service organizations provide all this and more, a direct outgrowth of the unique value system taught in yeshivas. Similarly, critical soft skills such as self-discipline, value for education, independent study skills, initiative, problem-solving, and studiousness are nurtured and developed by the unique education of yeshivas. These academic, spiritual, and developmental gains are cherished by our community and our greatest wish is to gift them to our children; but sadly the proposed evaluation criteria do not credit any academic value to the rigorous Judaic studies.

An additional complication to the proposed guidelines is that they grant evaluating and licensing power to bodies who are not equipped linguistically or culturally to comprehend what is being taught in the schools. This can result in inaccurate assessment of the actual value of the education being offered, as well as potential recommendations for culturally incompatible or undesired ancillary subjects to be taught. Related to this are concerns that granting excessive power to local school boards leaves the community subject to the whims of individuals who may have specific agendas.

Further, as mental health professionals who serve the Orthodox Jewish community and who are compliant with mandated reporting laws, we reject the claim that parents who place their children in yeshivas that do not meet the proposed criteria are neglecting the welfare of their children. The vast majority of parents in our community are devoted to the education and wellbeing of their children, and the proposal to consider them negligent for exercising freedom of religion and placing their children in schools that reflect their values is surprising and inappropriate. Children in yeshivas attend a rigorous educational framework daily and the guidelines should not carry the threat of declaring these serious students truant.

In summary, professional codes of ethics for mental health practitioners emphasize respect for diversity and for cultural values of minorities. We urge you to do the same by considering the many strengths that are unique to yeshiva education rather than seeking to replicate the public-school experience, which those in our community have not chosen for their children, often at great financial sacrifice. We hope that you will adopt policies that are respectful to the values of our community, recognize the academic value of our educational model, and emphasize collaboration and mutual respect rather than enforcement and coercion.

Sincerely,

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