

Comments in Opposition to the International Education Longitudinal Study

Karen R. Effrem, MD – President, Education Liberty Watch

As a pediatrician and president of a national grassroots parent organization with thousands of members, I am objecting to the International Education Longitudinal Study (FR Doc No: 2016-29749) that the National Center for Education Statistics is doing in conjunction with the Organization for Economic Cooperation and Development (OECD). This new study seeks to expand social emotional data gathering (psychological profiling) on our very youngest children, collect sensitive family information and try yet again to show that preschool is effective when there are so many studies to the contrary. The most concerning language from the federal register notice is emphasized below:

The IELS focuses on young children and their cognitive and non-cognitive skills and competencies as they transition to primary school. The IELS is designed to examine: children's early learning and development in a broad range of domains, ***including social emotional skills as well as cognitive skills; the relationship between children's early learning and children's participation in early childhood education and care (ECEC); the role of contextual factors, including children's individual characteristics and their home backgrounds and experiences***, in promoting young children's growth and development; and how early learning varies across and within countries prior to beginning primary school. In 2018, in the participating countries, including the United States, the IELS will assess nationally-representative samples of children through direct and indirect measures, and will collect contextual data about their home learning environments, ECEC histories, and demographic characteristics.

This study combines the worst aspects of both the dangers and ineffectiveness of government preschool programs and the indoctrination and profiling inherent in social emotional learning. Here are several of the many reasons this study should not go forward:

- 1) According to a compilation of over two dozen studies, there is already plenty of evidence that, at best, preschool is only minimally effective and at worst, there is significant evidence that these programs cause academic and emotional harm.¹
- 2) With so much evidence of ineffectiveness and harm, there is no reason to embark on yet another study at taxpayer expense.
- 3) This data gathering is unconstitutional - There is no constitutional, statutory² or moral authority for the federal government to create standards and norms for the attitudes, values and beliefs, for innocent American citizens, conduct psychological research on them and to keep this data in perpetuity in federally mandated state longitudinal databases that according to this proposal are going to be shared with a large international agency.
- 4) It goes against several Supreme Court precedents³ affirming parent's inherent rights to direct the education and upbringing of their children.

¹ Effrem, K. - Compilation & Analysis of Early Childhood Research Regarding Effect, Fade Out, Academic & Emotional Harm – Education Liberty Watch <http://bit.ly/1HaLi26>

² Effrem, K. - Mindsets, Noncognitive and Socioemotional Measurement in the National Assessment of Educational Progress <http://edlibertywatch.org/wp-content/uploads/2016/04/Mindsets-in-NAEP-final.pdf>

³ Mast, R. - Liberty Counsel Letter Regarding Assessing Mindsets in the NAEP – Liberty Counsel available at <http://edlibertywatch.org/wp-content/uploads/2014/11/Final-Ltr-NAEP-legal-and-privacy-concerns-06272016.pdf>

- 5) These types of standards and questions are highly subjective, especially when used for young children, as admitted by leading experts and organizations in the fields of education and mental health.⁴
- 6) Overworked, untrained teachers essentially become psychotherapists to their classrooms of patients.⁵
- 7) There is a clear link to Common Core⁶ and potential for both indoctrination and danger to student and family freedom of conscience covering such controversial topics as climate change, Buddhist mindfulness techniques,⁷ social justice,⁸ [transgenderism and the LGBT agenda](#)⁹ even in preschool standards and curricula.¹⁰
- 8) Because of the weak and gutted federal privacy law, the Family Educational Rights and Privacy Act (FERPA), this very sensitive data can be shared with various agencies of the federal government and third parties and re-disclosed and used for “predictive tests,” which are notoriously subjective and inaccurate. Data may then well be used to make life altering decisions for children affecting college entrance, employment, etc.
- 9) According to information uncovered by the US House Oversight and Government Reform Committee [hearings](#),¹¹ the state of data security at the US Department of Education is appallingly bad, so this sensitive data, that the government should not have in the first place, is not safe from hackers. We have no idea what the data protection situation is at OECD, and this very sensitive, personal data should not be available in other countries or to international agencies that promote education and workforce programs and principles contradictory to those of the American constitutional republic.

For all of these reasons, we strongly suggest that this study be cancelled.

⁴ Effrem, K. - Subjectivity of Social Emotional Learning, Mental Health, and Mental Illness Criteria Compilation and Analysis – Education Liberty Watch <http://edlibertywatch.org/wp-content/uploads/2014/11/SEL-Child-Mental-Health-Quotes-and-References3.pdf>

⁵Thompson, G. - A Mental Health Professional’s Perspective on the Common Core – Truth in American Education <http://truthinamericaneducation.com/common-core-state-standards/a-mental-health-professionals-perspective-on-the-common-core/>

⁶ Effrem, K. - Psychosocial Manipulation in the Common Core Standards and Aligned Tests and Curriculum – The Florida Stop Common Core Coalition - <http://www.flstopccoalition.org/files/45ACDEA5-46D6-408B-9934-4D8BE4B74449--8035CC3C-673E-49B4-8293-E43078236473/psychosocial-manipulation-in-the-common-core-standards-and-aligned-tests-and-curriculum.pdf>

⁷ 1440 Foundation – Mindfulness in Education and Social-Emotional Learning - <http://1440foundation.org/categories/mindfulness-in-education-and-social-emotional-learning/>

⁸ NoVo Foundation – Advancing Social Emotional Learning: A Strategic Approach <http://novofoundation.org/advancing-social-and-emotional-learning/strategic-approach/>

⁹ Arcus Foundation - Arcus, NoVo Foundation Announce Groundbreaking Philanthropy Initiative to Improve the Lives of Transgender People - <http://www.arcusfoundation.org/arcus-novo-foundation-announce-groundbreaking-philanthropy-initiative-to-improve-lives-of-transgender-people/>

¹⁰ Effrem, K. - New Head Start Performance Standards Cement National “Baby Common Core” Content Standards, Assessments, and Curriculum – Education Liberty Watch <http://edlibertywatch.org/2016/09/new-head-start-performance-standards-cement-national-baby-common-core-content-standards-assessments-and-curriculum/>

¹¹ U.S. House Oversight and Government Reform Committee November 17, 2015 and February 2, 2016 hearings - <https://oversight.house.gov/hearing/u-s-department-of-education-information-security-review/> and <https://oversight.house.gov/hearing/u-s-department-of-education-investigation-of-the-cio/>