

ATTACHMENT III

Summary of Public Comments and Agency Responses Related to Proposed New 19 TAC Chapter 74, Curriculum Requirements, Subchapter C, Other Provisions, §74.36, Requirements for Elective Courses on the Bible's Hebrew Scriptures (Old Testament) and New Testament and Their Impact on the History and Literature of Western Civilization

Comment. A professor of comparative literature at The University of Texas at San Antonio and an individual expressed concern that the guidelines for teaching of the Bible in public schools are too vague and allow for the possibility of indoctrination rather than instruction.

Agency Response. The agency has maintained language as filed as proposed.

Comment. The National Council of Jewish Women and an individual expressed concern that the vague guidelines under consideration focus on skills, not content, and include no meaningful standards schools can use to teach how the Bible has been influential in history and literature. The individual urged the adoption of clear, specific, and unbiased curriculum standards that promote a respectful study of the Bible and protect the religious freedom of students.

Agency Response. The agency has maintained language as filed as proposed.

Comment. An educator and an individual expressed the belief that the proposed rule violates separation of church and state and that the course cannot be taught without religious bias.

Agency Response. The agency has maintained language as filed as proposed. The SBOE is waiting for an attorney general ruling regarding constitutionality.

Comment. An individual expressed the belief that knowledge of Biblical stories would be advantageous to understanding allusions/archetypes of literature, but finds the course necessarily limited. The individual suggests a complementary course in Greek/Roman mythology.

Agency Response. The agency has maintained language as filed as proposed. State law and rule do not prohibit the teaching of a course on Greek/Roman mythology.

Comment. An individual asked which version of the Bible would be used for this course.

Agency Response. The agency has maintained language as filed as proposed. State law indicates that a student may not be required to use a specific translation as the sole text of the Hebrew Scriptures or New Testament and may use as the basic textbook a different translation of the Hebrew Scriptures or New Testament from that chosen by the board of trustees of the student's school district or the student's teacher.

Comment. An individual stated that mythologies of the Norse, Greeks, Romans, and Babylonians as well as the holy works of Buddhism, Hinduism, and Islam had an enormous impact on Western literature and should be included in this course as well.

Agency Response. The agency has maintained language as filed as proposed. State law and rule do not prohibit the teaching of suggested additional courses.

Comment. An individual expressed support for the course as long as it is not taught as religious Bible study and provided that districts do not make it a "de facto" requirement.

Agency Response. The agency has maintained language as filed as proposed.

Comment. Six individuals supported the proposed rule.

Agency Response. The agency has maintained language as filed as proposed.

Comment. A professor at Rice University expressed the belief that this course should only be taught by people who have extensive, certified training in biblical scholarship and in such a way that absolutely no effort will be made to convert students to a particular point of view regarding the truth or falsity of the Hebrew Bible.

Agency Response. The agency has maintained language as filed as proposed. The law outlines requirements for training of teachers who would teach this course.

Comment. An individual expressed concern the course will become a religious/faith-based course. The individual further commented that the main purpose of the course should be to teach understanding of biblical allusions that are commonly referred to in other written works.

Agency Response. The agency has maintained language as filed as proposed.

Comment. Two individuals supported the rule as long as the class is an elective and is not made mandatory.

Agency Response. The agency has maintained language as filed as proposed. The course will be an elective course and will not be mandatory.

Comment. An individual asked what type of certification would be required for this course.

Agency Response. The agency has maintained language as filed as proposed. State law requires that a teacher of a course offered under this section must hold a minimum of a High School Composite Certification in language arts, social studies, or history with, where practical, a minor in religion or biblical studies.

Comment. An individual expressed opposition to the rule. The individual further commented that these concepts are the responsibility of the home and religious institutions.

Agency Response. The agency has maintained language as filed as proposed.

Comment. Two individuals suggested that a course in all religions or in comparative religion would help further understanding of various cultures and religions by both teachers and students.

Agency Response. The agency has maintained language as filed as proposed.

Comment. An individual expressed opposition to the teaching of religion in public high schools using taxpayer dollars.

Agency Response. The agency has maintained language as filed as proposed.

Comment. A professor at Southern Methodist University expressed the belief that the proposed standards are inadequate and do not address the First Amendment aspect of religion courses. The professor indicated that standards developed specifically for Bible courses are essential to give Texas teachers the guidance they need to offer academically and legally appropriate classes.

Agency Response. The agency has maintained language as filed as proposed.

Comment. A letter was received from State Representatives Rob Eissler, Scott Hochberg, and Diane Patrick explaining that the main purpose of the legislation authorizing this rule was to provide for a well-defined curriculum. The letter indicated that the legislature expects the SBOE to adopt specific curriculum for elective courses and that extra attention to curriculum is required so districts will be less fearful of legal challenges. The letter further indicated that the existence of vendors selling Bible curricula in the marketplace does not justify the adoption of vague curriculum standards. In closing, the representatives urged the SBOE to reject the proposed vague standards and begin a process to build a well-defined course.

Agency Response. The agency has maintained language as filed as proposed.

Comment. A letter was received from the Texas Conservative Coalition supporting the proposed rule.

Agency Response. The agency has maintained language as filed as proposed.

Comment. A letter was received from the Anti-Defamation League expressing the belief that the best way to safeguard religious freedom is through separation of church and state. The letter further expressed concerns that the proposed rule is constitutionally problematic. Rather than being specific and exacting, it is overly general, broad, and discretionary. The Anti-Defamation League letter urged modification and revision of the rule.

Agency Response. The agency has maintained language as filed as proposed. The SBOE is waiting for an attorney general ruling regarding constitutionality.