

Education Liberty Watch Comments on Federal “Family Engagement” Policy

Jan 7, 2016

ELW

Detailed comments were submitted by Dr. Karen Effrem on January 4th in response to the US Departments of Health and Human Services and Education’s Orwellian Family Engagement Policy Framework. The full document is available here: [Family Engagement Policy Comments](#). A summary of the four main points of contention are as follows:

- 1. Parents are not just “equal partners,” they “own the store” when it comes to raising their children** – Although the document says on page one that “Families are children’s first and most important teachers, advocates, and nurturers” on page 1, it does not clearly set forth the preeminent role of parents in the education and upbringing of their children. Based on *Pierce vs. Society of Sisters*, *Troxel vs. Granville*, and *Meyers vs. Nebraska* to name a few seminal Supreme Court decisions that have affirmed the constitutional right of parents to direct the education and upbringing of their children, the pervasive language in this document that parents are mere partners with government or that government programs are to perform “parenting interventions” is extremely disturbing and unacceptable.
- 2. Promotion of government home visiting programs** – Based on this [agency’s own research](#), these programs are extraordinarily ineffective in two of the major areas that they are alleged to help:

Prevention of Child Maltreatment: *For primary measures in the studies reviewed where there was data listed, only 15/75 parameters (20%) showed a positive effect while 60/75 parameters (80%) showed no effect and there were many programs not studied.*

Child Development and School Readiness: *For primary measures in the studies reviewed where there was data listed, only 77/448 parameters (17%) showed a positive effect while 362/448 parameters (82%) showed no effect, 3/448 parameters (1%) showed a negative or ambiguous effect, and there were many programs not studied.*

- 3. Focus on social emotional parameters and data for young children** – It is the epitome of destruction of parental autonomy to have the federal government via any agency tamper with, manipulate, set norms for, or otherwise deal with anything in this realm. Psychiatric diagnosis and social emotional parameters are extremely subjective to begin with and are especially difficult to use for young children in particular. Having data and evaluations of these subjective and inaccurate parameters in children’s records that follow them for life is extraordinarily problematic.

4. **Data Privacy** – The draft document is replete with references to expand data collection such as this recommendation on page 9: “Develop and integrate family engagement indicators into existing data systems.” Students, families, and teachers whose sensitive personal and family data about everything from “social and emotional” issues to [genetic data in newborn screening](#) is collected and shared between many federal agencies and private entities. According to an investigation by [Politico](#), education technology companies are “scooping up as many as 10 million unique data points on each child, each day.” FERPA has been severely weakened via regulatory fiat to gut consent requirements and broaden access to data by federal agencies and private entities. Given both the extent and sensitivity of the data that would need to be collected, the spectacular failure of the federal government to protect citizen data (Healthcare.gov, OPM and NSA data breaches), and the complete absence of the word “consent” in this document, this kind of data collection should be eliminated, not expanded