



the education policy project

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University of California President James
Milliken
University of California
1111 Franklin Street, 12th Floor
Oakland, CA 94607
(via U.S. Mail and
Email president@ucop.edu)

University of California Regents Chair Maria
Anguiano
University of California
1111 Franklin Street, 12th Floor
Oakland, CA 94607
(via U.S. Mail and
Email regentsoffice@ucop.edu)

Re: University of California's California Subject Matter Project

Dear President Milliken and Regents Chair Anguiano,

We write to inform you that the University of California Office of the President's (UCOP) federally funded¹ California Subject Matter Project (CSMP) does not appear to be in alignment with UC Bylaw 12 and California and federal law.

JIMENA: Jews Indigenous to the Middle East and North Africa, is a U.S.-based nonprofit organization dedicated to advancing recognition and rights of the one million Sephardic and Mizrahi Jewish refugees from the Middle East and North Africa (MENA).² The Education Policy Project is an education law and policy expert.

We urge UCOP to:

1. Commission an independent audit³ of CSMP – including its nine satellite subject matter projects, regional collaboratives, and communities of practice – to (i) ensure their compliance with UC

¹ California Budget Act of 2026, AB 109 (chaptered June 29, 2026), Item 6100-195-0890 (Subject Matter Project \$3,410,000) https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB109 (provides that these federal Title II, Part A funds be transferred to the University of California and “used pursuant to Article 1 (commencing with Section 99200) of Chapter 5 of Part 65 of Division 14 of Title 3 of the Education Code” found in https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=EDC&division=14.&title=3.&part=65.&chapter=5.&article=1)

² Today, 10% of American Jews identify as Sephardic or Mizrahi—descendants of Middle East and North Africa (MENA) communities — and more than half of Israel's Jewish population traces its roots to these dispossessed communities. In the 20th century, nearly one million Jews across the MENA were subjected to state-sanctioned antisemitism, dispossession, and forced displacement from lands they and their ancestors had lived in continuously for over 2,500 years. For many Sephardic and Mizrahi Jews, this antisemitism that ultimately led to their expulsion and flight from MENA countries was initially experienced in school classroom instruction that set the stage for the broad societal conditions that enabled their collective persecution and displacement from the Arab and Muslim world.

³ University of California Audit Services' “Statement of Ethical Values and Standards of Ethical Conduct,” <https://www.ucop.edu/ethics-compliance-audit-services/files/stmt-stds-ethics.pdf> (“4. Compliance with Applicable Laws and Regulations ... University business is to be conducted in conformance with legal requirements, including contractual commitments .. The Office of the General Counsel has responsibility for interpretation of legal requirements [and] 5. Compliance with Applicable University Policies”)

policies and federal and state laws, and (ii) get recommendations for revisions to UCOP's current oversight processes to ensure this compliance going forward. This review would include CSMP's current recommended classroom and consulting materials as well as its posted professional development sessions.

2. Suspend CSMP consulting contracts and pause funding CSMP's nine subject matter projects, regional collaboratives, and communities of practice during this review period and until corrections are made with strong safeguards in place.

We identify several CSMP lessons, inquiry sets, and professional development recordings that appear non-compliant below.

Background

As you know, CSMP⁴ is California's main K-12 teacher pipeline program, established by the California legislature in 1988 to facilitate University of California faculty sharing their best practices with our state's K-12 educators. It now services approximately 30,000 teachers.

Unfortunately, in the past few years, following the passage of State of California's K-12 Ethnic Studies legislation, University of California faculty participating in CSMP began to advise K-12 educators to present students with selectively framed and politically motivated history that biases them against Jews and beliefs core to their identity such as Zionism, the right to self-determination in Jews' indigenous homeland of Israel.⁵

Non-Compliance with UC Policy and the Law

CSMP's materials on the Middle East and North Africa employ -- directly and by omission -- a discriminatory and contested interpretive framework that erases and misrepresents core aspects of Jewish history, current events, identity, and indigeneity. CSMP employs a settler-colonial ideological framework which results in politically motivated historical erasure and misrepresentations now evident in CSMP's materials and programming.

CSMP leaders acknowledge that their work, largely focused on Ethnic Studies, has become "politically controversial."⁶ For example, Palo Alto Unified School District did not renew its consulting contract with CSMP UC Berkeley History-Social Science Project upon receiving a formal complaint about its political

⁴ California Subject Matter Project (CSMP), <https://csmp.online/>, overseen by the University of California Office of the President, operates across multiple campuses in nine subject matter projects that host programming at more than 90 regional sites to provide, via University of California faculty, instructional materials and professional development accessible to California's approximately 1,000 public school districts serving nearly 6 million students. In 2023, UCOP reported that 25,000-30,000 California K-12 educators are in CSMP's network. https://www.ucop.edu/operating-budget/files/legreports/2023-24/csmp_legrpt.pdf

⁵ Hoover Institution, Stanford University, "Jewish Roots in the Land of Israel/Palestine," 2024, https://www.hoover.org/sites/default/files/research/docs/Strauss_WebreadyPDF.pdf and Pew Research, "U.S. Jews' Connections with and Attitudes Toward Israel," 2021, https://www.pewresearch.org/religion/2021/05/11/u-s-jews-connections-with-and-attitudes-toward-israel/pf_05-11-21_jewish-americans-07-2-png/ (83% of Jews believe that Israel is an essential or important part of their identity)

⁶ University of California Office of the President, *California Subject Matter Project (CSMP) In-Person Concurrence Committee Meeting Agenda*, June 4, 2025, Oakland, CA, <https://ucop.app.box.com/s/nvuotzggm5xuzmh9tprazzthlis234s0/folder/310465746702> (Statewide Office and Site Summaries: a "significant portion of the work ... is the support for schools and districts meeting the requirements of AB 101 that required the development and implementation of an Ethnic Studies course ... Ethnic Studies has become more politically controversial in the last three years which has impacted [our] contracts...with school districts")

orientation and contract provisions barring public transparency.⁷ This contravenes University of California Regents Bylaw 12 (Composition and Powers) rooted in the California Constitution. Regents Bylaw 12 requires the University to be administered "entirely independent of all political or sectarian influence and kept free therefrom."⁸

CSMP is funded with federal Elementary and Secondary Education Act (ESEA) funds.⁹ ESEA bars funding programs that discriminate on the basis of, among other things, religion and national origin.¹⁰ ESEA requires that its funds enable school sites to "prepare all students to meet the challenging State academic standards" and "increase student achievement consistent with [those] challenging State academic standards."¹¹ California State Board of Education's approved academic and social content standards require, among other things, that instruction "recognize the complexity of historical causes and effects [and] identify bias and prejudice in historical interpretations."¹²

Moreover, California law requires that (i) CSMP support teachers' content knowledge and pedagogical skills necessary to implement these State Board of Education standards,¹³ and (ii) K-12 classroom instruction (a) be factually accurate and align with standards, (b) not promote a discriminatory bias on the basis of, among other things, ethnicity, religion, and nationality, and (c) not be advocacy, personal opinion, bias, or partisanship.¹⁴

Examples

CSMP's K-12 instructional materials, recommended resources, and professional development programs present contested historical positions and assert political claims as established fact; omit and misrepresent Jewish history, current events, identity, and indigeneity; and, as stated above, fail to align with the California State Board of Education's academic and social content standards.

These concerns are evident in the work produced at several University of California CSMP centers including:

1. **Selective Historical Framing & Omission of Key Historical Facts:** Inquiry sets from CSMP University of California Davis California History-Social Science Project:
 - a) "*Nations and Terrorism*" inquiry set presents primary sources that justify terrorism, instructing students to examine "the culpability of American actions." Students read Iran Ayatollah Khomeini's speech describing his Shi'ite revolutionary movement as needed to "put the United States in its place [and] cut off its hands" – the "straight path of Islam ...

⁷ Palo Alto Parent Alliance letter to Palo Alto Unified School District objecting to UC Berkely History-Social Science Project, March 7, 2024, <https://drive.google.com/file/d/1ic9B7HfgyuMAIPdenla8O9KCKMX4Z4Z4/view?usp=sharing>

⁸ Regents of the University of California, "Bylaw 12: Composition and Powers,"

<https://regents.universityofcalifornia.edu/governance/bylaws/bl12.html>

⁹ California Budget Act of 2026, AB 109 (chaptered June 29, 2026), Item 6100-195-0890,

https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB109 and California Department of Education, *California Every Student Succeeds Act (ESSA) State Plan*, December 2023, page 129, <https://www.cde.ca.gov/re/es/>

¹⁰ Elementary and Secondary Education Act Section 8534 (Civil Rights), codified as 20 U.S.C. Section 7914.

¹¹ Elementary and Secondary Education Act Sections 2001 and 2101(c)(4)(B)(viii) (Purpose and State Uses of Funds), codified in 20 U.S.C. Sections 6601 and 6611(c)(4)(B)(viii)

¹² California State Board of Education's History-Social Science Content Standards,

<https://www.cde.ca.gov/be/st/ss/documents/histsocscistnd.pdf>, and California State Board of Education's Social Content Standards, <https://www.cde.ca.gov/ci/cr/cf/lc.asp>

¹³ California Education Code Section 99200.5(a)(3),

https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC§ionNum=99200.5.

¹⁴ California Education Code Section 51500, as amended by Assembly Bill 715 (2025),

https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC§ionNum=51500.

is fighting against oppressive powers” – while omitting his regime's seeding terrorism and violence in the Middle East and severe oppression of women, homosexuals, and Jews. Students also read revolutionary Carlos Marighella’s manifesto calling upon oppressed peoples to unite in liberation struggles, defining victory as the ““destruction of imperialism”” through prolonged and violent conflict against the United States, described as the ““great enemy of the human race.””¹⁵

- b) “*Modern Palestinian History*” inquiry set, created with the assistance of the Chair of University of California Berkeley Palestinian and Arab Studies Department Professor Ussama Makdisi, frames Jewish presence in Israel as European “Zionist colonization” beginning in the late 19th century, omitting over two millennia of continuous Jewish presence in the region. Similarly, its instructional materials characterize the movement of Jewish communities from countries such as Iraq and Egypt as “emigration,” without incorporating Jews’ longtime presence in the region nor the documented expulsions, detention, and confiscation of property that accompanied the forced departure of nearly one million Jewish refugees from those countries in the 20th century.¹⁶
2. **Presentation of Contested Claims as Fact:** CSMP University of California Los Angeles History and Geography Project’s K-12 Ethnic Studies Certificate Program¹⁷ focuses on “the occupation of Palestine and genocide of Palestinians,” as well as on “critical perspectives on terrorism and global conflicts,”¹⁸ using political publisher Rethinking School’s “*Teaching Palestine*” as a resource¹⁹ – all partisan political positions devoid of the full historical context, legal definitions, and competing perspectives.
3. **Biased Representation:** CSMP University of California Berkeley History-Social Science Project's High School Ethnic Studies Initiative promotes “liberated” Ethnic Studies resources that embed anti-Israel biases. It co-hosted a professional development program for K-12 teachers with a university professor who called out the “lies of the Zionist regime” as the reason they should

¹⁵ University of California Davis California History-Social Science Project Inquiry Set, “*Nations and Terrorism*,” 2020, <https://ucdavis.app.box.com/s/3x47nwqi4hqkxowj3jlpd5lnvd7uh6dz>

See also “*Terrorism*” lesson narrowly focused on anti-Muslim extremism that leads students to the website of U.S. designated foreign terrorist organization Al-Qaeda which provides “tools (bomb manuals, encryption software, etc.) needed to carry out jihad.” University of California Davis California History-Social Science Project Inquiry Set, “*Terrorism*,” 2019, <https://ucdavis.app.box.com/s/ilu0pb8mrk1nnu3kn5pupaux2m8kqvm>

¹⁶ University of California Davis California History-Social Science Project Inquiry Set “*Modern Palestinian History*,” 2025, <https://ucdavis.app.box.com/s/0fbpxqh73wbyw62q7jareq092efxkc1p>
See also “*Middle Eastern Jewish Life and Early Zionism, 1880–1920*,” University of California Davis California History-Social Science Project, 2025. <https://ucdavis.app.box.com/s/wk14mc3fty2utuc8g3nk44nvdu1n2ctt> and “*Cold War-Decolonization*,” University of California Davis California History-Social Science Project Lesson, 2013, <https://ucdavis.app.box.com/s/6aams84eqj5p462kz60585f0x4sho7sq>.

¹⁷ UCLA Teacher Education Program (@k12ethnicsciencesatucla), *Instagram post*, March 17, 2025, <https://www.instagram.com/k12ethnicsciencesatucla/p/DHUrI2vP6Sy/>

¹⁸ UCLA Teacher Education Program Faculty Advisor Darlene Lee, Declaration, *American Association of University Professors v. Donald Trump*, No. 3:25-cv-07864-RFL, October 5, 2025 (U.S. District Court, Northern District of California).

¹⁹ Zinn Education Project (@zinneeducationproject), *Instagram post*, August 8, 2025, <https://www.instagram.com/p/DNGO38DANIh/>

teach about Palestine in their classrooms, without offering countervailing facts and interpretations.²⁰

4. **Promotion of Activist-Driven Content:** CSMP University of California Santa Cruz History and Civics Project's K-12 Ethnic Studies Pedagogy Collaborative's recommended "Palestinian Liberation Resources" are rife with anti-Israel materials prepared by activists including the Middle East Children's Alliance, Palestinian Youth Movement, Palestinian Feminist Collective, and Liberated Ethnic Studies Model Curriculum Consortium.²¹

Call for CSMP Suspension and Audit

Accordingly, we respectfully call for UCOP to suspend CSMP and conduct this thorough audit of the CSMP program and UCOP's oversight systems to ensure that, going forward, CSMP only disseminates K-12 public school materials and teacher trainings that are legally-complaint, accurate, balanced, and align with CA State Board of Education's approved academic and social content standards.

While we affirm the importance of academic freedom and the role of universities in fostering open inquiry, debate, and exposure to diverse perspectives, that does not override the State of California's requirement that K-12 classroom instruction and professional development materials comply with the California State Board of Education approved academic standards, the California Education Code, and federal grant terms and conditions.

We appreciate your attention to this critically important matter and stand ready to provide any additional information that may be helpful.

We shared these concerns with the United States House Committee on Education and Workforce after House Committee Chair Walberg²² stated that his committee's oversight responsibilities extend to ensuring that K-12 schools are "cared for by the ...institutions...that receive federal dollars" too.²³



Sarah Levin, JIMENA Executive Director

SarahLevin@JIMENA.org



Lauren Janov, The Education Policy Project Founder

LJanov@EdPolicyProject.org

²⁰ University of California Berkeley High School Ethnic Studies Initiative, <https://americancultures.berkeley.edu/hsesi>, and University of California Berkeley High School Ethnic Studies Initiative "Teaching Histories of Anti-Imperialist Solidarity" video, 2024, <https://www.youtube.com/watch?v=EfXSozH7JOY>

²¹ University of California Santa Cruz History and Civics Project's "Ethnic Studies Pedagogy Collaborative Resources Main Document," (on file with author)

²² JIMENA and The Education Policy Project letter to US House Committee on Education and Workforce, April 30, 2026, <https://www.jimena.org/wp-content/uploads/2026/05/JIMENA-and-EPP-Letter-2.pdf>

²³ U.S. House Committee on Education and Workforce, "Antisemitism in Higher Education: Examining the Role of Faculty, Funding, and Ideology" video, July 15, 2025, <https://www.youtube.com/live/T-R8vkAYekI> ("our K-12 students are in danger next" and "our responsibility at federal level is to make sure that the local schools, K-12, are ... cared for by the state and locals ...that receive federal dollars, we have an oversight responsibility") (hour 3:25-3:26 and 3:28). See also U.S. House Committee on Education and Workforce, "How Campuses Became Hotbeds: The Rise of Radical Antisemitism on College Campuses" Report, March 2026, <https://www.dropbox.com/scl/fi/kw4w8wuxj9ecwpevss7gp/How-Campuses-Became-Hotbeds-the-Rise-of-Radical-Antisemitism-on-College-Campuses.pdf?rlkey=tsuha6vybakp5oqlxhto1euth&e=6&st=08c027lp&dl=0> and https://edworkforce.house.gov/news/documentsingle.aspx?DocumentID=413173&utm_source

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Charles Robinson, General Counsel and Senior Vice President of Legal Affairs, University of California

Alexander Bustamante, Senior Vice President and Chief Compliance and Audit Officer, University of California