

Education Not Arms Coalition

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October 28, 2010

Board of Trustees
San Diego Unified School District
4100 Normal St.
San Diego, CA 92103

Subject: Proposed Policy on Recruiting Activities in San Diego Schools

Dear Board Members:

We are writing in support of the proposed policy on recruiting activities that is expected to be on your agenda in November.

It is important that students have access to information that can help them make informed decisions about their future, and for that reason recruiters can play a positive role in our schools. We believe this policy is needed, however, in order to address critical concerns that have surfaced over pupil privacy, parental rights and the lack of balance in the information many students receive on post-graduation options. The policy would address those concerns by implementing a set of standards that would be applied fairly to all recruiting organizations, whether they are offering information on employment or higher education. Most of its elements are drawn from other school districts that have adopted the same or similar provisions (see the attached footnoted summary).

Specific reasons for the policy include:

1. There is a serious imbalance in the presentation of post-graduation options.

In making its recent commitment to improving student access to A-G courses, the district has taken a positive step toward addressing inequality in the way some students are prepared for post-graduation career and educational options; however, when it comes to learning about their options, students are not getting balanced access to information. At some schools in the district, students report that they rarely, if ever, see recruiters from colleges and civilian employers. Instead, they are met as often as weekly by military recruiters in lunch areas and other school locations. In some cases, students have experienced disruptions in their classes to accommodate visits by military representatives, and in at least one recent case, a special award ceremony for a student athlete was turned into an assembly promoting a single military branch (see attached MBHS photos). Students have indicated that in many of these settings, including lunch areas, recruiters approach them aggressively and treat them as a captive audience, a

condition that most adults would not tolerate if they were subjected to such behavior themselves.

Under this proposed policy, students could learn about options they are interested in without being involuntarily subjected to aggressive marketing and recruiting at school, and instructional time would be protected from disruptions that primarily serve the interests of an individual recruiting organization.

2. The privacy of pupils is not being protected.

The district has a number of procedures in place to protect pupil privacy; however, these procedures and the laws mandating them are circumvented when representatives of outside groups are permitted to use their access to schools to collect extremely personal information on students that is then used for marketing and recruitment purposes.

For example, attached is a student contact form that Army representatives circulated in 2009 to hundreds of students at one school. Not only does this form skirt existing district procedures that provide the armed forces with access to pupil contact information, it includes categories of information that, under federal and state law, schools are prohibited from releasing without parental permission or a court order. The form goes so far as to question students about their citizenship status. Students reported they were enticed to complete the form with the promise of a chance to win an iPod. At other schools, military representatives are giving physical fitness tests in PE classes and telling students to fill contact forms in order to receive their test results.

Many of the district's secondary schools are also giving students the Dept. of Defense's Armed Services Vocational Aptitude Battery (ASVAB). If schools do not dictate otherwise, the information collected with this test is automatically used for marketing and recruitment purposes. Attached is the test form students are required to complete, which among other things asks for their race, ethnicity and Social Security number. According to a 2008 report on ASVAB testing by the Philadelphia Inquirer (<http://tinyurl.com/pedesa>), seven San Diego Unified secondary schools administered the ASVAB during the 2006-2007 academic year; the personal information on all tested students was automatically provided to recruiters.

The proposed policy would implement standards for recruiting activities in schools that would allow organizations to present information to students as willing recipients and without violating their privacy. It would permit the continued use of the ASVAB test as a guidance tool but require the selection of ASVAB release option 8, the military's option for prohibiting the automatic use of student information for recruitment purposes. Option 8, which still lets students release their own test data later, is now the policy in New York City, Los Angeles, various other districts in California, and the entire state of Maryland.

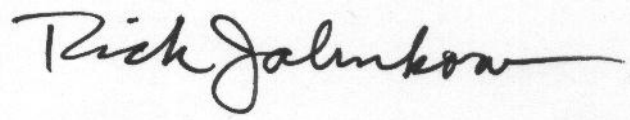
3. Parental and guardianship rights are not being protected.

Parents and guardians have a reasonable expectation that unless they give their written permission, schools will not grant outsiders access to sensitive personal information about their children, the vast majority of whom are under age 18. With only very narrow, specific exceptions, our federal and state laws are written to ensure this, and the district has its own policies and procedures to implement those laws. However, many of the district's procedures are rendered meaningless when outside companies and organizations are allowed to enter schools and, without parental knowledge or permission, collect sensitive personal information directly from students. Instead of protecting parental rights, the district is helping to circumvent them.

The proposed policy would prohibit many of the excessive recruiting practices that violate parental and guardianship rights. It would also establish greater consistency with the district's existing policies and procedures.

In summary, we hope the district will support and adopt this policy as a necessary step toward establishing equitable access for recruitment organizations and providing balanced information for students seeking to make informed decisions about their future.

Sincerely,

A handwritten signature in black ink that reads "Rick Jahnkow". The signature is written in a cursive style with a long horizontal flourish at the end.

Rick Jahnkow
For the Education Not Arms Coalition

Enclosures: Footnoted summary of proposed policy
 Photos: Army assembly at MBHS
 Student contact form, U.S. Army
 DD Form 1304-5AS, ASVAB test answer sheet