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MOVING FROM ESSENTIALISM TO INTERSECTIONALITY IN ASIAN AMERICAN HISTORY CURRICULUM: CALIFORNIA AS A NATIONAL MODEL

Lavanya Sathyamurty

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INTRODUCTION

In recent years, activists have campaigned across the country for schools to incorporate ethnic studies into their curricula. For example, in 2021, California Governor Gavin Newsom signed a new law mandating an ethnic studies graduation requirement for all high school students, starting with the class of 2030.[1] While this movement has greatly benefited students by exposing them to multicultural perspectives, misconceptions, such as the model minority stereotype often assigned to Asian Americans, still pervade school curricula. The stereotype portrays Asian Americans as having more of a hard-working mentality and a propensity for achieving socioeconomic success, compared to other ethnic groups.[2] This is especially important in a state like California, which is home to nearly a third of the country's Asian population and twenty-one Asian ethnic groups.[3] School curriculum standards must move away from an essentialist point of view, which assumes that Asian Americans have a uniform experience, and explore the intersectional oppressions that impact the Asian American community. For example, Asian American students in

1. Megan Tagami, *California High Schools are Adding Hundreds of Ethnic Studies Classes. Are Teachers Prepared?* (Mar. 31, 2023), CAL MATTERS, https://calmatters.org/education/higher-education/college-beat/2023/03/california-high-schools-ethnic-studies/ [https://perma.cc/ZRA4-8D76].

2. *See* Jerry Z. Park, *Second-Generation Asian American Pan-Ethnic Identity: Pluralized Meanings of a Racial Label*, 51 SOCIO. PERSPS. 541, 552–53 (2008).

3. Milan Vaishnav & Nitya Labh, *Asian Americans in California: Results From a 2022 Survey*, CARNEGIE ENDOWMENT FOR INT'L PEACE (Oct. 17, 2023), https://carnegieendowment.org/research/2023/10/asian-americans-in-california-results-from-a-2022-survey?lang=en [https://perma.cc/L8S9-RKZB].

Berkeley High School only learned about Chinese and Japanese culture and never discussed Southeast Asian history, such as the wartime conflict in Laos.[4] Schools should also recruit and support Asian American educators, as these teachers' cultural knowledge and racialized experiences will bring the revised curriculum to life. Changes to California's curriculum can serve as a model for the rest of the nation at a time when the model minority myth is manipulated by legislators to suggest that Asian Americans have overcome racism to achieve socioeconomic success and fuel the anti-critical race theory movement, that suppresses learning about racial oppression in schools altogether.

ASIAN AMERICAN DISCRIMINATION IN CALIFORNIA

As California schools launch ethnic studies classes to comply with the state mandate, it is important that these courses discuss Asian American oppression to avoid perpetuating the model minority myth. California, though traditionally viewed as a progressive state, is the site of many instances of Asian American discrimination. In 2023, three Hindu temples, one of India's most popular religions, were desecrated, one of a record eight instances of anti-Hindu hate crimes reported in California in a single year.[5] The Newark Shri Swaminarayan Temple was sprayed with graffiti defaming the Indian prime minister and calling for Sikhs, another religious group, to secede from a Hindu-majority India.[6] Pushpita Prasad, a spokeswoman for the Coalition of Hindus for North America, shared that these hate crimes are caused by the conflation of the Hinduism's social caste system and anti-India issues, driven by Indian politicians' endorsement of upper caste practices.[7] Another example of anti-Asian discrimination was seen in 2013 when Hieu Nguyen, founder of the grassroots organization Viet Rainbow in Orange County, fought for the right of Vietnamese LGBTQ+ groups to march in a Lunar New Year parade after being told by parade organizers that the groups' participation was not in line with Vietnamese culture.[8] Due to these harmful beliefs held by many first-generation Asian immigrants and the emphasis on family in Asian culture, many LGBTQ Vietnamese Americans in the Southern California region, including those in long-term relationships, have not yet come out to their parents.[9] Some of the contemporary struggles faced by Asian Americans, such as Islamophobia, mirror the issues they have faced in decades past. Islamophobia is intertwined with anti-Asian discrimination, as it often targets South Asian and South West Asians, who are racialized as Muslim.[10] For example, in the wake of the Hamas attack on October 7th, 2023, many Muslim, Arab, and

4. Jean Yonemura Wing, *Beyond Black and White: The Model Minority Myth and the Invisibility of Asian American Students*, 39 URBAN REV. 455, 473 (2007).

5. Shaanth Nanguneri, *Hate Crimes Rise Against Indian Americans in California, Deepening a Divide Between Hindus and Sikhs*, CAL MATTERS (Sept. 9, 2024), https://calmatters.org/justice/2024/09/california-hindu-hate-crimes/ [https://perma.cc/5D48-2BCL].

6. *Id.*

7. *Id.*; Anupam Nath, *One Issue Proved Key To the Opposition's Stunning Success in India's Election: Caste Politics*, THE CONVERSATION (June 6, 2024, 2:23 AM), https://theconversation.com/one-issue-proved-key-to-the-oppositions-stunning-success-in-indias-election-caste-politics-231588 [https://perma.cc/5FDR-MWN3].

8. Kevin Truong, *For Asian Americans, Coming Out in 2019 can Still Present Unique Challenges*, NBC NEWS (June 17, 2019, 5:34 AM), https://www.nbcnews.com/news/asian-america/asian-americans-coming-out-2019-can-still-present-unique-challenges-n1016771 [https://perma.cc/TZ2W-E6HS].

9. *Id.*

10. *Post 9-11 Backlash*, SOUTH ASIAN AMERICANS LEADING TOGETHER, https://saalt.org/policy-change/post-9-11-backlash/ [https://perma.cc/5F88-2ZSS].

Palestinian students reported increased instances of verbal abuse from classmates and teachers.[11] Even before this event, Muslim students were already bullied at more than twice the rate of the larger student population.[12] Ali Awad, an Atlanta-based attorney, analogizes the level of Islamophobia incited by the Hamas attack to his experience as a fifth grader during the 9/11 attacks in 2001.[13] In elementary school, a classmate asked Awad why his family was killing everyone in front of the whole class.[14] Following the events of October 7th and Awad's demonstration of Palestinian solidarity, a fellow attorney threatened to hunt Awad down.[15]

Another parallel between past and present discrimination can be seen in the rise in anti-Asian hate crimes during the pandemic in 2020, during which many Asian Americans struggled to leave their homes to access vital care due to fear of racially motivated violence.[16] The threat of violence, as well as the delay in health care, poses a serious threat to the Asian American community.[17] This is not the first time that fear has impeded access to health care for Asian Americans. During Japanese Americans' incarceration in World War II internment camps, pregnant women were scared to seek treatment, worried that they would be deemed unfit to work and become the targets of violence by military officials.[18]

Despite all of these acts of prejudice, Asian Americans are continually deemed the "model minority," a supposedly perfect example of overcoming discrimination to achieve the American dream, often defined by economic success.[19] Yet, the aggregation of Asian American subgroups hides the economic disparities: For example, 39.4% of Burmese Americans live below the poverty line, compared to only 6.8% of Filipino Americans.[20] Moreover, this falsehood supports the idea that inequities experienced by Black Americans, such as gaps in wealth and educational attainment, cannot be explained by systemic racism.[21] The model minority myth is used to debunk the existence of systemic racism. This idea

11. Ismail Allison, *CAIR California Study Finds Muslim Students are Bullied at Twice the Rate of National Statistic*, CAIR (Nov. 2, 2023, 2:46 PM), https://www.cair.com/press_releases/cair-california-study-finds-muslim-students-are-bullied-at-twice-the-rate-of-national-statistic/ [https://perma.cc/K8Z5-P9YD].

12. *Id.*

13. Sakshi Venkatraman & Mirna Alsharif, *For Muslim Americans, a Spike in Hate Incidents Feels Reminiscent of Post 9/11 Islamophobia*, NBC NEWS (Oct. 31, 2023, 4:36 PM), https://www.nbcnews.com/news/asian-america/muslim-americans-spike-hate-incidents-feels-reminiscent-post-911-islam-rcna122570 [https://perma.cc/GKJ5-96TA].

14. *Id.*

15. *Id.*

16. Jenny Chen, *"She Hardly Goes Out": Racism is Keeping Many Asian Americans From Going to the Doctor*, VOX (June 30, 2022, 4:30 AM), https://www.vox.com/23185392/hate-crimes-asian-americans-doctor [https://perma.cc/X3DG-JS6X].

17. *Id.*

18. Jasmine Davies, Reproducing Evacuees: Japanese American Women's Experiences with Reproductive Health During United States Internment, 1942–1945, at 17–18 (May 2022) (M.A. thesis, Texas State University) (on file with author).

19. Kat Chow, *"Model Minority" Myth Again Used as a Racial Wedge Between Asians and Blacks*, NPR (Apr. 19, 2017, 8:32 AM), https://www.npr.org/sections/codeswitch/2017/04/19/524571669/model-minority-myth-again-used-as-a-racial-wedge-between-asians-and-blacks [https://perma.cc/EV66-LDEM].

20. *Data Disaggregation Action Network*, LEADERSHIP CONFERENCE EDUCATION FUND, https://civilrights.org/edfund/data-disaggregation-action-network/#:~:text=Aggregated%20data%20hide%20inequities.&text=As%20just%20one%20example%2C%20aggregate,large%20disparities%20among%20AANHPI%20groups. [https://perma.cc/TQ88-DPZL].

21. *Id.*

strategically draws a wedge between Asian Americans and Black Americans, painting Asian Americans as superior and immune to the effects of systemic racism, and makes way for anti-critical race theory bans, which view racism as a problem of the past and find it unnecessary to discuss systemic racism in the classroom at all.

DEFINING ESSENTIALISM

Essentialism refers to the concept that a certain group has a unitary experience that can be isolated from other dimensions of identity.[22] For example, the idea that the Asian woman's experience can be described as impacted by race alone instead of both race and gender. This theory envisions well-defined social and physical boundaries between different identity groups marked by each group's innate and immutable characteristics. Minority communities craft these collective identities to combat the stigmatized terms used by the dominant White population to describe them, such as the fetishization of Asians. However, these essentialist groupings can also mask intergroup differences in a harmful way.[23]

On one hand, essentialism is intellectually convenient, as the prevalence of systemic racism already trains people to think of others in terms of racial categories,[24] allowing people to organize their experiences as aligned with that of a particular group, even if it requires denying other aspects of their being.[25] Therefore, an essentialist perspective leads to the recognition of shared suffering[26], which lends itself to coalition-building and presents a simpler route for political movements.[27] The framework serves a desire to project a cohesive, positive image of the community, both for internal solidarity and outside acceptance.[28] For example, in April 2024, a coalition of Asian American organizations, elected officials, and community members held a rally opposing SB 264, a Florida law that prohibits Chinese immigrants from buying homes in many parts of the state due to national security concerns, despite the lack of a connection between security threats and the purchase of residential property.[29] Advocates from the coalition asserted that Chinese people should not be viewed with suspicion and that laws like SB 264 fuel racism against all Asian immigrant communities.[30] The Asian American Legal Defense Fund, in conjunction with other organizations, represented Chinese immigrants in challenging this statute and successfully pushed the Eleventh Circuit Court of Appeals to temporarily halt the

22. Kevin Gosine, *Essentialism Versus Complexity: Conceptions of Racial Identity Construction in Educational Scholarship*, 27 CAN. J. EDUC. 81, 82 (2002).

23. *Id.*

24. *See* Angela P. Harris, *Race and Essentialism in Feminist Legal Theory*, 42 STAN. L. REV. 581, 588 (1990).

25. *Id.* at 607.

26. *Id.* at 615.

27. *See id.* at 589.

28. Gosine, *supra* note 22, at 92.

29. Michelle Boykins, *Historic Legal Battle Unveiled Against Discriminatory Florida Housing Law SB 264*, ASIAN AMS. ADVANCING JUST. (May 6, 2024), https://www.advancingjustice-aajc.org/press-release/historic-legal-battle-unveiled-against-discriminatory-florida-housing-law-sb-264 [https://perma.cc/WA5G-TYU4].

30. Sin Yen Ling, *Asian American Community and Allies Rally Against Florida's Anti-Chinese Land Law After Court Hearings*, CHINESE FOR AFFIRMATIVE ACTION (Apr. 19, 2024), https://caasf.org/press-release/asian-american-community-and-allies-rally-against-floridas-anti-chinese-land-law-after-court-hearings/ [https://perma.cc/MX63-F7C9].

enforcement of the law while the court decided on its constitutionality.[31] On the other hand, the opposite extreme to essentialism, mindless pluralism, would make collective advocacy like this incredibly difficult, as it recognizes infinite unique experiences and offers no room for generalization.

However, essentialism can also serve as a reductive oversimplification. This framework overlooks certain perspectives, which can be damaging for groups that are already disregarded. For example, the experiences of Black women are largely underrepresented in legal scholarship, and essentializing the Black female experience only exacerbates this problem by ignoring the nuances of intersectionality, an acknowledgment of how race and gender oppression interact.[32] Similarly, the minority experience is often described without considering other aspects of identity, such as class and sexual orientation.[33] Scholars should adopt multiple consciousness, which recognizes that people are oppressed in multiple ways, all of which impact one another.[34] The law has repeatedly oppressed the most marginalized populations, only worsened by the fact that the courts refuse to recognize unconscious racism as a violation of the Equal Protection Clause.[35] Unconscious racism is even more dangerous, as it is more difficult to recognize, and prohibit, discriminatory behaviors when there is a lack of conscious intent. Highlighting one voice as representative of an entire group, as essentialism does, can harmfully further the false narrative of ethnic groups having overcome racism.[36] The model minority myth demonstrates this phenomenon. Learning only that Asian Americans are the highest-earning ethnic group in America hides the fact that Asian Americans also exhibit the greatest income inequality, with Asians at the 90th percentile earning $110,000 more than those at the 10th percentile.[37] Essentializing the Asian American experience does not recognize how several aspects of one's identity, such as refugee status, impact access to education and, subsequently, a high income.[38]

Despite its drawbacks, essentialism has been adopted in legal scholarship and school curricula alike, partly due to the lack of an alternative. Proposed substitutes largely involve casting off racial identity in favor of a differently constructed identity. This has been met with resistance from scholars, since those frameworks are abstract and offer no guarantee of

31. ACLU, *ACLU Applauds Appeals Court Decision Halting Enforcement of Florida Law That Bans Many Immigrants from China and Other Countries From Buying Homes* (Feb. 1, 2024, 7:00 PM), https://www.aclu.org/press-releases/aclu-applauds-appeals-court-decision-halting-enforcement-of-florida-law-that-bans-many-immigrants-from-china-and-other-countries-from-buying-homes [https://perma.cc/R64Z-AU5N].

32. Harris*, supra* note 24, at 585; Gosine, *supra* note 22, at 91.

33. Harris, *supra* note 24, at 585.

34. Harris*, supra* note 24, at 587.

35. William M. Wiecek, *Structural Racism and the Law in America Today*, 100 KY. L.J. 1, 7 (2011).

36. *See* Harris, *supra* note 24, at 585.

37. Rakesh Kochhar & Anthony Cilluffo, *Income Inequality in the U.S. is Rising Most Rapidly Among Asians*, PEW RSCH. CTR. (July 12, 2018), https://www.pewresearch.org/social-trends/2018/07/12/income-inequality-in-the-u-s-is-rising-most-rapidly-among-asians/ [https://perma.cc/U55A-UHBU].

38. *See* Dedrick Asante Muhammad & Maya Kurani, *Racial Wealth Snapshot: Asian Americans and the Racial Wealth Divide*, NAT'L CMTY. REINVESTMENT COAL. (Aug. 23, 2023), https://www.ncrc.org/racial-wealth-snapshot-asian-americans-and-the-racial-wealth-divide-2023/ [https://perma.cc/246A-MK4G].

success.[39] In fact, scholars encourage the use of essentialism in political strategy as long as advocates understand that these groups are fluid and temporary.[40] This would allow for confrontation, rather than suppression, of intergroup differences and, subsequently, strengthen the fight for political change by ensuring that advocacy efforts are sensitive to the needs of different groups.[41]

ESSENTIALISM AND THE ETHNIC STUDIES MOVEMENT

Essentialism of minority groups has been successfully used in many areas of advocacy, including education. Throughout history, grassroots coalitions around the country have fought to include ethnic studies in school curricula.[42] For example, in Rhode Island, OurSchoolsPVD, a coalition of youth-led education advocacy groups, worked with Providence School Board president to craft a resolution, which would require an ethnic studies graduation requirement in all schools in the district.[43] The Vermont Education Justice Coalition, a statewide advocacy group, worked with public school representative and state administrators to integrate ethnic studies into K-12 curriculum.[44] Ethnic studies employ culturally relevant pedagogy and explores the historical oppression of people of color, predicated on the idea that schools must depart from a race-neutral approach and instead teach "America's inconvenient and necessary truths."[45] In 1968, the Third World Liberation Front, a multiracial coalition of student groups at UC Berkeley and San Francisco State University, engaged in a five-month strike to demand higher education institutions implement ethnic studies, which led to the establishment of the first ethnic studies courses in the nation.[46] The Asian American Political Alliance at UC Berkeley was a major force in this coalition and played an important role in the subsequent development of Asian American Studies curricula at San Francisco State University, UC Berkeley, and UCLA.[47]

More recent ethnic studies campaigns in K-12 schools have been inspired by an important case: *Arce v. Douglas* (2015).[48] After the Arizona state legislature passed laws eliminating the Mexican American Studies programs in Tucson public schools, ten teachers

39. Aimee Van Wagenen, *The Promise and Impossibility of Representing Anti-Essentialism: Reading Bulworth Through Critical Race Theory*, 14 RACE, GENDER & CLASS 157, 166 (2007).

40. Gosine, *supra* note 22, at 94.

41. Gosine, *supra* note 22, at 94.

42. Tania Uruchima, *Implementing Ethnic Studies in California Public Schools*, 1 J. CRITICAL EDUC. POL. STUD. SWARTHMORE COLL. 7, 8 (2016).

43. Amy Russo, *Education Advocates Have Pushed for Ethnic Studies for Years. Are Leaders Listening?*, PROVIDENCE J. (May 22, 2024), https://www.providencejournal.com/story/news/education/2024/05/22/years-long-push-for-ethnic-studies-in-ppsd-may-be-gaining-traction/73769133007/ [https://perma.cc/5ZVC-EKNY].

44. Peter D'Auria, *State Officials Want to Incorporate Ethnic Studies Into Classrooms. Private Schools Say the New Rules Shouldn't Apply To Them.*, VT DIGGER (Dec. 15, 2022, 6:17 AM), https://vtdigger.org/2022/12/15/state-officials-want-to-incorporate-ethnic-studies-into-classrooms-private-schools-say-the-new-rules-shouldnt-apply-to-them/ [https://perma.cc/M8RT-G6NA].

45. Uruchima, *supra* note 42, at 8.

46. Christine Tran, *Asian American Studies: Made in California*, PBS SOCAL (May 15, 2020), https://www.pbssocal.org/shows/asian-americans/asian-american-studies-made-california [https://perma.cc/927T-JQYF].

47. *See id.*; *The Third World Liberation Front and the Origins of Ethnic Studies and African American Studies at UC Berkeley*, BERKELEY LIBR., https://guides.lib.berkeley.edu/twlf/archives [https://perma.cc/LUC8-7B44].

48. Arce v. Douglas, 793 F.3d 968, 981 (9th Cir. 2015).

and the director of the program filed a suit and argued that the laws had been passed with discriminatory intent.[49] The plaintiffs pointed to overwhelming evidence that the statutes were motivated by racial animus. John Huppenthal, a state senator who helped pass the statutes, had posted several comments on public blogs, stating that "this is America; speak English" and that there should be "no Spanish radio stations, no Spanish billboards, no Spanish TV stations."[50] Eventually, the plaintiffs prevailed on the basis of "a student's First Amendment right to receive information."[51] The court decided that "the state cannot remove curricular material unless removal is reasonably related to legitimate pedagogical concerns."[52] Furthermore, there was sufficient evidence that the district violated the Equal Protection Clause and was discriminating against students based on race and national origin.[53]

This case has encouraged movements across the country to incorporate ethnic studies into school curricula. This advocacy has caused a sizable shift in California's education system. While 20 percent of California public school students had access to ethnic studies from 1997 to 2014, 50 percent of students enjoyed access in 2020.[54] More recently, in the last five years, several groups, including lawmakers, students, and teachers, have pushed state and local governments to not only implement but mandate ethnic studies.[55] Student-led movements, with statewide chapters making calls and sending emails to the State Assembly, resulted in over 22,000 petition signatures in support of the California ethnic studies requirement.[56] Starting with the 2025–26 school year, all California high schools must offer an ethnic studies course, and the class will be a statewide graduation requirement for the class of 2030 and beyond.[57] Other states have also taken part in the ethnic studies movement. In 2018, the Texas State Board of Education approved plans to build a new course, "Ethnic Studies: An Overview of Americans of Mexican Descent."[58] The state is also welcoming proposals from the Texas Education Agency Staff for future comprehensive ethnic studies classes.[59] In 2021, the Washington State Board of Education established a statewide ethnic studies graduation requirement in all high schools.[60] The passing of the

49. Juliet Dee, *Do Bans on Teaching "Divisive Concepts" Interfere With Students' Right to Know?*, 13 AAUP J. ACAD. FREEDOM 1, 3–4 (2022).

50. *Id.* at 4.

51. *Id.* at 5.

52. Leslie Ann Locke & Ann E. Blankenship, *Keeping the Flames at Bay: The Interplay Between Federal Oversight and State Politics in Tucson's Mexican American Studies Program*, 10 J. EDUC. CONTROVERSY 1, 12–13 (2015).

53. *Id.*

54. Emily K. Penner & Dan Ma, *Access To Ethnic Studies in California Public Schools* 10 (Nov. 2023) (unpublished manuscript) (Annenberg Inst. at Brown Univ., Paper No. 23-886).

55. *See* Iris Kim, *California Plans To Make Ethnic Studies a Requirement for Public-School Students. Here's the History Behind the Idea*, TIME (Sep. 15, 2020, 1:27 PM), https://time.com/5888853/ethnic-studies-california/ [https://perma.cc/4QD3-83M6].

56. *Id.*

57. John Fensterwald, *California Becomes First State To Require Ethnic Studies in High School*, EDSOURCE (Oct. 8, 2021), https://edsource.org/2021/california-becomes-first-state-to-require-ethnic-studies-in-high-school/662219 [https://perma.cc/HL9G-PNAR].

58. *Board Approves First Ethnic Studies Course*, TEX. STATE BD. OF EDUC., https://sboe.texas.gov/state-board-of-education/sboe-news/sboe-newsletter/board-approves-first-ethnic-studies-course [https://perma.cc/JRQ7-YZBK].

59. *Id*.

60. Jenn Smith, *Washington ethnic studies graduation requirement gains support from Board of Education*, SEATTLE TIMES (Mar. 16, 2021, 6:00 AM), https://www.seattletimes.com/education-

mandate marked the beginning of a lengthy process to develop ethnic studies materials and teacher training materials with the help of community input.[61] Notably, Illinois was the first state in the nation to specifically require a unit of Asian American history be taught in public elementary and high schools, beginning with the 2022–2023 school year. The bill specifies that the curriculum must include contributions made by Asian Americans in advancing civil rights and to the economic, cultural, social, and political development of the nation.[62] Laws, such as this one, open the door to discussing the oppression of Asian Americans as well.

BENEFITS OF THE ETHNIC STUDIES MOVEMENT

Students in ethnic studies courses enjoy many benefits. The curriculum allows students to understand the origins and contributions of marginalized groups as well as the structural hurdles they have overcome historically and continue to face today.[63] In fact, students who have taken an ethnic studies course express more positive attitudes and a higher level of empathy toward the groups discussed in the classroom.[64]

Discussing these topics has an especially significant impact on students of color. Before the implementation of ethnic studies, students of color expressed frustration about having to learn "about White people all the time."[65] Students of color understood that structural racism played a role in their everyday lives, yet the school curriculum decentered their perspectives and presented racism as a problem that was solved with the emancipation of slaves.[66] Even when teachers recognized the importance of discussing racism in the classroom, they often avoided nuanced conversations of race out of fear of classroom tension.[67]

After the launch of ethnic studies courses, students of color became more engaged in their schooling. Students, even those previously uninterested in reading, began consuming literature written by and about people of their racial background, and they deeply connected with the themes in the book.[68] Notably, the students were excited to be able to identify with the main characters.[69] The students' experiences were only enhanced when the teacher encouraged them to bring their personal knowledge to classroom discussions. For example, while reading *Malcolm X: A Fire*, a biography of a prominent civil rights activist, Black students were eager to share what they already knew about the civil rights movement and how racial discrimination manifests in people's everyday lives.[70]

Because students felt more engaged in their coursework, they showed more interest in their education, as seen by higher rates of high school attendance and increased graduation

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lab/washington-ethnic-studies-graduation-requirement-gains-support-from-board-of-education/ [https://perma.cc/2YXS-UEFK].

61. *See id.*

62. Press Release, Ill. Gov't, Gov. Pritzker Signs Historic Legislation Requiring Asian American History to be Taught in Public Schools (July 9, 2021).

63. *See* Sade Bonilla, Thomas S. Dee & Emily K. Penner, *Ethnic Studies Increases Longer-Run Academic Engagement and Attainment*, PROC. NAT'L ACAD. OF SCIS., Sept. 7, 2021, at 8.

64. CHRISTINE E. SLEETER, THE ACADEMIC AND SOCIAL VALUE OF ETHNIC STUDIES 4 (2011).

65. *See* Janine de Novais & George Spencer, *Learning Race To Unlearn Racism: The Effects of Ethnic Studies Course-Taking*, 90 J. HIGHER EDUC. 860, 878 (2018).

66. *See* SLEETER, *supra* note 64, at 9.

67. *Id.* at 4.

68. *See id.* at 9.

69. *Id*.

70. *Id.*

rates.[71] Education scholars theorize that conversations about the impacts of structural racism allow students to feel acknowledged and encourage them to engage more meaningfully in school.[72] Possessing a deeper awareness of one's race and racism is also correlated with an increased chance of pursuing higher education,[73] as this knowledge leads to an enhanced understanding of how education can serve as a tool to navigate racist institutions and advocate for equity in one's community.[74]

ESSENTIALISM OF THE ASIAN AMERICAN EXPERIENCE

Though ethnic studies courses greatly benefit students, it is important that the curriculum does not essentialize the experiences of certain groups. For example, Asian Americans are often made invisible in history classes and even when included, are represented in an unnuanced manner.[75] The narratives presented in the classroom usually highlight only certain groups in the Asian American community, specifically those who have achieved economic success, and perpetuate the model minority myth, which presents Asian Americans as immune to the oppressions that plague other minority groups.[76] In reality, this is far from the truth.

More than fifty years ago, scholars noted the lack of Asian American representation in US history textbooks. Today, not much progress has been made. At the root of this issue is that Asian American figures are largely missing from the history curriculum standards in many states. For example, not a single Asian American was included in a list of ninety-six historical figures in California's standards.[77] Even when Asian Americans are included in the curriculum, they are presented as foreigners who stole jobs from hardworking Americans or as disloyal citizens rightfully incarcerated during World War II.[78] Other states have skills-based standards that don't specify the content that needs to be included in the curriculum, meaning teachers do not necessarily have to touch on Asian American history. For example, South Dakota requires that high school students demonstrate the ability to "explain the causes, events, and consequences of the Second World War including issues at home and abroad."[79] Though some teachers fulfill this requirement by teaching about the Japanese incarceration, they can also choose to teach a topic other than Asian American history.[80] Even when teachers do include Asian American history, they often only give attention to Chinese Americans in the 1800s and Japanese Americans during World War II.[81] Topics

71. Bonilla, Dee, & Penner, *supra* note 63, at 8.

72. *Id.*

73. SLEETER, *supra* note 64, at 8.

74. *Id.* at 9.

75. Olivia B. Waxman, *A "History of Exclusion, of Erasure, of Invisibility." Why the Asian-American Story is Missing From Many U.S. Classrooms*, TIME (Mar. 30, 2021, 12:35 PM), https://time.com/5949028/asian-american-history-schools/ [https://perma.cc/VY2X-GLBJ].

76. *The Model Minority Myth*, HARV. L. SCH. CTR. ON LEGAL PRO. (Nov./Dec., 2018), https://clp.law.harvard.edu/knowledge-hub/magazine/issues/asian-americans-in-the-law/the-model-minority-myth/ [https://perma.cc/C284-U82H].

77. *See* Sohyun An, *Re/Presentation of Asian Americans in 50 States' K-12 U.S. History Standards*, 113 SOC. STUD. 171, 173 (2022).

78. *See id*.

79. *Id.*

80. *Id.* at 176.

81. Noreen Naseem Rodriguez, *"Caught Between Two Worlds": Asian American Elementary Teachers' Enactment of Asian American History*, 55 J. AM. EDUC. STUD. ASS'N. 214, 216 (2018).

such as the Asian American civil rights movement and alien land laws are rarely discussed and included in only one out of thirty-two states' standards.[82]

Unfortunately, Asian Americans continue to be excluded from school curricula even as anti-Asian violence has skyrocketed, and it has become more important than ever to discuss discrimination against Asian Americans. Anti-Asian hate crimes had, in fact, been taking place for decades before the pandemic but were dangerously on the rise following the outbreak of the disease in China. In only the first year after the COVID-19 outbreak, nearly 7,000 cases of anti-Asian violence were reported.[83] The idea that Asian Americans were dangerous foreigners became even more prevalent and manifested in acts of violence against the ethnic group.[84]

As anti-Asian discrimination remains pervasive, it becomes even more important to discuss these issues in the classroom. Teachers have a difficult time implementing the Asian American experience into their curriculum in the context of the quickly growing, changing demographic. When Asian American studies was first established, the focus was on the Chinese and Japanese cultures, in hopes that students of these backgrounds would be able to see themselves in the material.[85] After all, the term 'Asian American' was developed during the Civil Rights Era, during which Chinese and Japanese American college-age students protested the Vietnam War and sought to increase awareness of the racial discrimination they had faced.[86] These demonstrations eventually led to the demand for ethnic studies programs as well as Asian American studies programs.[87]

However, in post-1960s America, demographics have changed drastically. Immigration waves have resulted in the diversification of all ethnic groups, including Asian Americans.[88] Yet, when teachers respond to the growing diaspora by incorporating information about South Asians, Koreans, and Filipinos, it is often disjointed from the rest of the curriculum and included at the tail end of an already brief lesson on Asian Americans.[89] Even issues connected to important events in U.S. history, such as the oppression of Muslim women after 9/11, are overlooked. Therefore, teaching about these other ethnic groups often feels like an afterthought, a tokenistic addition.[90]

PERPETUATION OF THE MODEL MINORITY MYTH

This lack of discussion about Asian Americans and the injustices they have faced in school curricula means that the model minority myth continues to persist. This phenomenon has led to an identity crisis for many students. A Filipino University of California alumnus, Aaron, shares that his college experience opened his eyes to the separation drawn between his community and other groups under the Asian American umbrella.[91] Filipino students,

82. An, *supra* note 77, at 176.
83. *Id.* at 173.
84. *Id.*
85. *See* Keith Osajima, *Pedagogical Considerations in Asian American Studies*, 1 J. ASIAN AM. STUD. 269, 271 (1998).
86. Park, *supra* note 2, at 542.
87. *Id.*
88. *Id.*
89. Osajima, *supra* note 85, at 270.
90. *Id.*
91. Anthony C. Ocampo, *"Am I Really Asian?": Educational Experiences and Panethnic Identification among Second-Generation Filipino Americans*, 16 J. ASIAN AM. STUD. 295, 295 (2013).

like Aaron, did not fit into the model minority stereotype.[92] While his other Asian classmates were thought to be studious and intelligent, Filipino students were viewed as academically inferior.[93] As he progressed through his college years, Aaron even found himself refraining from identifying as Asian American.[94] Other Filipino students have also so deeply internalized this lack of adherence to the model minority expectation that they did not seek educational opportunities and expressed surprise when professors awarded them with honors.[95] The transition to college was especially difficult for students who graduated from high schools with a large Filipino population, where being Filipino was practically synonymous with being Asian, and later attended large public institutions where they were largely outnumbered by other Asian groups and labeled an "underrepresented identity."[96]

Other groups in the Asian American community share similar experiences with the model minority myth regarding academic achievement. Cambodian Americans are seen as low-achieving relative to other Asian subgroups.[97] One high school administrator asserted that Cambodian Americans are "not like the Japanese and Chinese," stating that Cambodian students were involved in gangs and not held to the same expectations of academic excellence by their parents as other Asian Americans.[98] This sentiment is unfortunately very apparent to Cambodian American students. A high-achieving high school junior, Ratana, shared that people were surprised to learn that he was Cambodian: "It's like, I don't know, like I'm an exception or something . . . like the Cambodians aren't supposed to be smart or something."[99]

Not only has the model minority myth harmed Asian American groups, but legislators have repeatedly manipulated the belief to achieve political aims, such as striking down affirmative action. In 2014, Students for Fair Admissions (SFFA) filed a successful claim against Harvard,[100] alleging that the university unlawfully discriminates against Asian American applicants.[101] This litigation purports the mistruth that affirmative action pits Asian Americans against other students of color.[102] SFFA perpetuated the idea that Asian Americans deserve higher rates of admission, framing them as the ideal, hard-working minority.[103] However, this narrative effectively hides the fact that Asian admission is

92. *Id*.
93. *Id*.
94. Ocampo, *supra* note 91, at 295.
95. *Id.* at 313.
96. *Id.* at 311.
97. Vichet Chhuon & Cynthia Hudley, *Ethnic and Panethnic Asian American Identities: Contradictory Perceptions of Cambodian Students in Urban Schools*, 43 URBAN REV. 681, 689 (2010).
98. *Id.* at 690–91.
99. *Id.* at 695.
100. Hoang Pham, Imani Nokuri, Fatima Dahir, & Mira Joseph, *Students for Fair Admissions v. Harvard FAQ: Navigating the Evolving Implications of the Court's Ruling*, STAN L. SCH. BLOGS (Dec. 12, 2023), https://law.stanford.edu/2023/12/12/students-for-fair-admissions-v-harvard-faq-navigating-the-evolving-implications-of-the-courts-ruling/ [https://perma.cc/3V7B-PLLA].
101. Jonathan P. Feingold, *SFFA v. Harvard: How Affirmative Action Myths Mask White Bonus*, 107 CAL. L. REV. 707, 708 (2019).
102. *Id.* at 710.
103. Monica Sidana, *Affirmative Action and the Model Minority Myth*, BERKELEY POL. REV. (Dec. 9, 2023), https://bpr.studentorg.berkeley.edu/2023/12/09/affirmative-action-and-the-model-minority-myth/#:~:text=Blum's%20argument%20exemplifies%20the%20model,groups%20in%20the%20United%20States [https://perma.cc/XE2F-VRDW].

actually suppressed to preserve White privilege.[104] The admissions process places a lot of emphasis on race and class privilege, leading to easier pathways to acceptance for the wealthy and well-connected, who are often White.[105] In fact, White students are accepted over more qualified Asian applicants.[106] Notably, this litigation did not change the legacy admissions process that heavily favors those associated with Harvard's alumni base, in which White people remain the predominant group and Asians are underrepresented.[107]

The model minority myth has been used to pit Asian Americans against the Black community. The dominant narrative, propagated by White people through media portrayals, paints the Black community as violent and lazy and the Asian American community as law-abiding and hardworking.[108] The dominant narrative leads to tension between the two racial groups. Black Americans felt Korean Americans were receiving preferential treatment for bank and government loans, when bank and government lenders actually uniformly rejected loan applications for people of all races in poor, minority neighborhoods, like South Angeles.[109] Therefore, when the 1992 Los Angeles riots occurred in response to the beating of Rodney King by four White Los Angeles Police Department officers, the media blamed the violence fully on Black-Asian conflict rather than the White police officers who brutally killed Rodney King.[110] For example, reporters focused instead on the killing of Black teenager Latasha Harlins at the hands of a Korean grocer and repeatedly ran a story along the lines of, "Girl killed over $1.79 bottle of juice."[111] News reports portrayed Korean immigrants with guns in their hands; yet most Korean business owners did not even own guns and none were interviewed about the incident.[112] The media did not report that while police brutality was commonplace, claiming the lives of more than 600 people every year,[113] the killing of Harlins by a Korean grocer was a rare incident. Furthermore, there was a complete disregard for Black-Asian coalition efforts throughout history.[114] For example, Asian activist Grace Lee Boggs was a leader in Detroit's Black Power movement to advocate for better housing conditions.[115] In 2016, a group of young Asian Americans

104. *See* Feingold, *supra* note 101, at 710.

105. *See id.* at 712.

106. *Id.* at 723.

107. *Id.* at. 729.

108. King-Kok Cheung, *(Mis)interpretations and (In)justice: The 1992 Los Angeles "Riots" and "Black-Korean Conflict"*, 30 MULTI-ETHNIC LITERATURE OF THE UNITED STATES 3, 7 (2005).

109. *Id.* at 8.

110. *See id.* at 12.

111. *See id*. at 11.

112. *See id.* at 11.

113. *U.S. Data on Police Shootings and Violence,* UNIV. OF ILL. CHI., https://policeepi.uic.edu/u-s-data-on-police-shootings-and-violence/ [https://perma.cc/5ZC4-CMJ9].

114. Jennifer Lee & Tiffany Huang, *Why the trope of Black-Asian conflict in the face of anti-Asian violence dismisses solidarity*, BROOKINGS (Mar. 11, 2021), https://www.brookings.edu/articles/why-the-trope-of-black-asian-conflict-in-the-face-of-anti-asian-violence-dismisses-solidarity/ [https://perma.cc/VC4B-ZAME].

115. Kat Chow, *Grace Lee Boggs, Activist and American Revolutionary, Turns 100*, NPR (June 27, 2015, 7:03 AM), https://www.npr.org/sections/codeswitch/2015/06/27/417175523/grace-lee-boggs-activist-and-american-revolutionary-turns-100 [https://perma.cc/Q7TU-ENAY].

founded Letters for Black Lives, a foundation that provides multilingual resources to educate Asian families about Black Lives Matter.[116]

MOVING FROM ANTI-ESSENTIALISM TO INTERSECTIONALITY

To combat the model minority myth, schools must not only anti-essentialize the teaching of Asian American history but actively promote an intersectional understanding of the population. Anti-essentialism is distinct from intersectionality. Kimberlé Crenshaw, a leading scholar of critical race theory, explains that essentialism has a "single-axis" problem.[117] Academics often think of injustice as only happening along a singular axis, such as race or class, and independently of other identities.[118] She points specifically to the example of Black women, who are often silenced in conversations about feminist theory: How can claims about what women are fighting for disregard the experiences of Black women?[119] Too often, White women speak for all women.[120] However, Crenshaw is not arguing for a solely anti-essentialist approach, in which a new essentialism, the essentialism of all Black women, would replace the current status quo.[121] She instead makes a case for intersectionality, which considers all the forms of oppression that a person might endure.[122] She asks scholars to consider that different types of discrimination interact to form a person's experience rather than thinking along only certain axes of identity.[123]

SOLUTION

Intersectionality in school curriculum can be a powerful tool to combat the model minority myth. To fight against the misconception that all Asian Americans experience socioeconomic success, which is a broad assumption, schools should delve into intersectional oppressions faced by specific groups under the pan-Asian umbrella. It is important that these lessons are geographically grounded in the students' communities, as place-based learning encourages students to connect their lessons to their lived experiences and feel more confident in their ability to effect change.[124] This paper will propose changes to the California curriculum as an example since the state has a growing Asian American population[125] and is often viewed as a leader in national policy.[126]

116. Cady Lang, *The Asian American Response to Black Lives Matter is Part of a Long, Complicated History*, TIME MAGAZINE (June 26, 2020, 2:49 PM), https://time.com/5851792/asian-americans-black-solidarity-history/ [https://perma.cc/BQY8-K3Z2].

117. Devon W. Carbado & Cheryl I. Harris, *Intersectionality at 30*, 132 HARV. L. REV. 2193, 2202 (2019).

118. *Id.*

119. *Id.* at 2203.

120. *See id.* at 2201.

121. *See id.* at 2200.

122. *Id.* at 2199–2200.

123. *See id.* at 2202.

124. *See* Gregory A. Smith, *Place-Based Education: Learning To Be Where We Are*, 8 PHI DELTA KAPPAN 584, 587, 594 (2002).

125. Vaishnav & Labh, *supra* note 3.

126. *See* Pilar Marrero, "California is the United States of America, Just Sooner," PBS SOCAL (Oct. 6, 2020), https://www.pbssocal.org/shows/187/california-is-the-united-states-of-america-just-sooner [https://perma.cc/S885-8BLP].

WHAT HAS ALREADY BEEN DONE?

California has already taken strides toward improving Asian American history curricula in schools. In October 2021, California became the first state to make a semester-long ethnic course a requirement for high school graduation, resulting from decades of strategic advocacy.[127] The California Asian American and Pacific Islander Legislative Caucus had previously refused to support performative measures, such as SB 1363, which only "encouraged" teaching the contributions of California Asian Americans and Pacific Islanders as part of social sciences in California schools and did not provide any funding for curricula or educators to implement these changes.[128] The caucus successfully demanded that Asian American history be a requirement in the curriculum, one that is backed by adequate funding.[129] In fact, California State University campuses and the Academic Senate for California Community Colleges have followed suit and also implemented an ethnic studies class into their general education requirements.[130]

Through this shift, the state takes steps to address what should be viewed as a serious gap in the education system. May Lee, an adjunct professor at USC Annenberg School for Communication and Journalism who grew up in Ohio during the 1970s, states that she was taught little to no Asian American history in school.[131] Instead, she was made to feel "otherized" as one of the only Asian children in her town.[132] Those who grew up in Southern California during the same period, such as Chair of the California Assembly budget committee, Phil Ting, report having similar experiences despite the higher Asian American population in this region.[133] Unfortunately, not enough has changed over the last few decades. Megan Zhang, a recent USC graduate, shares that she did not learn about Asian American history, including important events such as the Chinese Exclusion Act of 1882, until she took a college general education course titled "Race in America."[134]

This shocking disregard for Asian American history has concerning consequences. According to the 2022 Social Tracking of Asian Americans in the U.S. Index, a survey

127. Danielle Smith, *Bringing Stories of Asian Americans and Pacific Islanders Into Classrooms*, NBC L.A. (July 27, 2022, 1:34 PM), https://www.nbclosangeles.com/news/local/aapi-education-california-ucla/2941576/ [https://perma.cc/GD5T-ZY7Z].

128. *California AAPI Legislative Caucus Opposes SB 1363 and Demands Actions over Promises for the AAPI Community*, CAL. ASIAN AM. & PACIFIC ISLANDER LEGIS. CAUCUS (June 22, 2022), https://aapilegcaucus.legislature.ca.gov/sites/aapilegcaucus.legislature.ca.gov/files/product_documents/6–22 22%20California%20AAPI%20Legislative%20Caucus%20Opposes%20SB%201363%20and%20Demands%20Actions%20over%20Promises%20for%20the%20AAPI%20Community.pdf [https://perma.cc/2TYZ-LYKP].

129. *See id.*

130. Michael Burke, "*How New Law Requiring Ethnic Studies at California State University will Affect Community Colleges,"* EDSOURCE (Nov. 2, 2020), https://edsource.org/2020/how-new-law-requiring-ethnic-studies-at-california-state-university-will-affect-community-colleges/642192 [https://perma.cc/Z6FB-VXK5]; "*Ethnic Studies*," CA COMMUNITY COLL., https://www.cccco.edu/About-Us/Chancellors-Office/Divisions/Educational-Services-and-Support/What-we-do/ethnic-studies [https://perma.cc/PV8U-2XYL].

131. Danielle Smith, *supra* note 127.

132. Gregory A. Smith, *supra* note 124.

133. Melany De La Cruz-Viesca, *Asian American Studies Center to create free resource for high school teachers*, UCLA ASIAN AM. STUD. CTR. (July 18, 2022), https://www.aasc.ucla.edu/news/aasctextbook2022.aspx [https://perma.cc/M269-3QLH].

134. Gregory A. Smith, *supra* note 124.

conducted by a UCLA academic advisory board, 58 percent of Americans could not name a prominent Asian American, and 42 percent could not name a significant Asian American historical moment after the World War II incarceration of Japanese Americans.[135]

To address this issue, UCLA is developing materials to bring stories of Asian Americans and Pacific Islanders into K-12 classrooms. The UCLA Asian American Studies Center received $10 million from the state to develop and launch an AAPI Multimedia Textbook in 2023, which is now available online for free.[136] This textbook, which can be used for a single class period or a week-long module,[137] includes various lessons and learning activities with audio and visual components, informed by scholarly works. The resource draws upon archival artifacts to cover everything from the struggles faced by the Asian American community to the group's societal contributions.[138]

The center has used the funding not only to develop the materials but also to test the online learning platform and train teachers nationwide on how to implement these lessons into their curriculum.[139] Importantly, this textbook will continue to be edited and refined to best serve teachers' needs and reflect current issues in the Asian American community.[140]

HOW CAN CALIFORNIA IMPLEMENT AN INTERSECTIONAL APPROACH?

First, the California K-12 curriculum should explore the intersection of caste and gender discrimination. A large portion of Indian society is guided by a caste system, which creates a social hierarchy and allows for little social mobility.[141] Unfortunately, this caste system continues to impact the lives of Indians who have migrated to the United States. In 2020, a group of Silicon Valley women engineers who belong to the Dalit caste, the lowest rank in the hierarchy, released a statement on caste bias in the tech industry.[142] The women reported being asked questions about their religion, spouses, and place of origin, which are meant to discern one's caste by their managers.[143] Caste determinations then governed the hiring, referral, and peer review processes in their workplaces.[144] They argue that being a woman in STEM has already exposed them to blatant misogyny, such as inappropriate comments from men and sexual harassment.[145] The added layer of caste discrimination has

135. Caroline Harting, *Why Academia Should Focus Research on the Asian American and Pacific Islander Experience*, COLUMBIA UNIV. (May 5, 2022), https://news.columbia.edu/news/why-academia-should-focus-research-asian-american-and-pacific-islander-experience [https://perma.cc/3UJG-WTF8].

136. Gregory A. Smith, *supra* note 124.

137. *Id.*

138. *See id.*

139. *Id.*

140. *See University of California, Los Angeles: Asian American Studies Center to Create Free Resource for High School Teachers*, INDIA EDUC. DIARY (July 20, 2022), https://indiaeducationdiary.in/university-of-california-los-angeles-asian-american-studies-center-to-create-free-resource-for-high-school-teachers/ [https://perma.cc/FP29-4CM7].

141. Sindhuja Sankaran, Maciek Sekerdaj & Ulrich von Hecker, *The Role of Indian Caste Identity and Caste Inconsistent Norms on Status Representation*, 8 FRONTIERS IN PSYCH., Mar. 31, 2017, at 1–2.

142. *A statement on caste bias in Silicon Valley from 30 Dalit women engineers*, WASH. POST (Oct. 27, 2020, 1:39 PM), https://www.washingtonpost.com/context/a-statement-on-caste-bias-in-silicon-valley-from-30-dalit-women-engineers/d692b4f8-2710-41c3-9d5f-ea55c13bcc50/ [https://perma.cc/M8N3-PL9K].

143. *Id*.

144. *Id*.

145. *Id*.

only led to even more assumptions that these women are incompetent and have abused the affirmative action system to earn jobs that they, in fact, rightfully deserve.[146]

Despite these complaints, California Governor Newsom blocked a bill to ban caste discrimination in California, claiming that the bill was "unnecessary."[147] Despite various attempts to amend the bill to appease legislators, Governor Newsom stated that the state already offers expansive civil rights protections and the bill would only be duplicative of existing law.[148] Without the addition of "caste" to the definition of "ancestry," California law remains vague and makes no explicit mention of any racially discriminatory terms, including those used to describe the South Asian community.[149]

Teachers should also explore the intersection of religion and gender discrimination in the Asian American community. After the events of 9/11, there was a rise in anti-Muslim sentiment, and dozens of mosques across the nation became targets for hate crimes.[150] For instance, people vandalized the Madera Islamic Center, a mosque in the San Joaquin Valley, with hateful signs, such as "Wake up America, the Enemy is here," and threw a brick at the building.[151] Furthermore, the San Francisco office of the Federal Bureau of Investigation launched a "Mosque Outreach" program that recorded Muslim religious leaders' and congregants' identities through mosque visits and disseminated the information to other government agencies, marking Muslims as threats to national security.[152]

Schools should specifically discuss how Muslim women have been uniquely victimized in the hyper-surveillance following 9/11. For example, a woman wearing an Islamic headscarf on a flight in California was deemed suspicious by a member of the crew.[153] The crew member claimed she heard the passenger say, "[I]t's a go," when the passenger had actually said, "I've got to go."[154] A woman wearing a headscarf is often faced with a slew of negative stereotypes: because she is visibly Muslim, people assume that she is a terrorist, terrorist sympathizer, or unassimilable foreigner. Because she is a woman, she is viewed as a victim of Muslim male patriarchy, possibly oppressed by her terrorist husband or father.[155] Because the headscarf is mandatory, Muslim women cannot avoid these interactions. On the other hand, Muslim men are allowed to shave their beards and wear Western clothing, because many Muslims consider these practices optional.[156] Thus, the headscarf places the Muslim woman in uniquely oppressive circumstances.

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146. *Id.*

147. Sameea Kamal, *Newsom blocks a bill to ban caste discrimination in California*, CAL MATTERS (Oct. 7, 2023), https://calmatters.org/politics/2023/10/caste-discrimination-newsom/#:~:text=Senate%20Bill%20403%2C%20 introduced%20by,instead%20of%20a%20 separate%20category/ [https://perma.cc/LCQ8-GBUS].

148. *Id.*

149. *Id.*

150. *Madera Islamic center vandalism called hate crime*, SAN DIEGO UNION TR. (Aug. 25, 2010, 2:25 PM), https://www.sandiegouniontribune.com/sdut-madera-islamic-center-vandalism-called-hate-crime-2010aug25-story.html/ [https://perma.cc/MQ7T-MBDF].

151. *Id.*

152. *FBI Using "Mosque Outreach" to Gather Intelligence*, ACLU NORCAL (Mar. 27, 2012), https://www.aclunc.org/news/fbi-using-mosque-outreach-gather-intelligence?utm_source=chatgpt.com [https://perma.cc/3VM7-BW9J].

153. Sahar F. Aziz, *From the Oppressed to the Terrorist: Muslim-American Women in the Crosshairs of Intersectionality*, 9 HASTINGS RACE & POVERTY L.J. 191, 225 (2012).

154. *Id.*

155. *Id.*

156. *Id.* at 224–25, n.146.

In addition to discussing caste and gender discrimination, schools must also delve into discrimination faced by queer Asian Americans. First, teachers should note that there is not much research in this area, which indicates the lack of importance academics assign to this population. Then, students should learn that trans and gender-nonconforming (TGNC) Asian Pacific Islanders must confront oppression in many areas of their lives, as seen by a study conducted in the San Francisco Bay Area.[157] In this region, 22 percent of LGBTQ Asian Americans experienced homelessness, compared to 17 percent of the LGBTQ population as a whole. Specifically, older Asian adults are usually cared for by children and other relatives; therefore, family estrangement due to LGBTQ status can make this group especially vulnerable to homelessness.[158] A shocking 40 percent of TGNC Asian Pacific Islanders dealt with bathroom-based harassment, relative to only 12 percent of the general TGNC population. Race and gender identity both play a role in this community's ability to report violence to law enforcement. Asian Americans have the lowest level of comfort with reporting to law enforcement, compared to the other ethnic groups, due to language barriers and fear of retaliation, especially following the pandemic-related hate crimes against Asian Americans.[159] LGBTQ+ individuals are more likely to face police search, detainment, and arrest, resulting in a hesitation to call the police for help.[160] Examining the intersection of these two identities, over 75 percent of the Asian American TGNC respondents stated that they were uncomfortable with police interactions, citing a lack of respect.[161]

Finally, the curriculum should explore the intersection of racial discrimination and pregnancy discrimination, which is a form of sex discrimination. During World War II, people of Japanese ancestry were forced to relocate to internment camps and placed under government surveillance based on racist beliefs that they were a threat to national security.[162] The United States justified the internment by claiming that Japanese Americans were "too Japanese" to be considered American despite their pledging loyalty to the United States. These camps denied Japanese Americans access to sanitation, privacy, and healthcare.[163]

These conditions were especially harmful for pregnant mothers. Over 5,000 babies were born in the internment camps.[164] Many women initially attempted to hide their pregnancies from the Army using loose clothing.[165] They feared for both their babies and themselves, as adults deemed unfit for work could be violently targeted.[166] At the camps,

157. Alicia K. Matthews et al., *Factors Influencing the Well-being of Asian-American LGBT Individuals Across the Lifespan: Perspectives from Leaders of Community-Based Organizations*, 22 BMC GERIATRICS 1, 6 (2022).

158. *Id.*

159. Kimmy Yam, *Asian Americans Are Least Likely to Report Hate Incidents, New Research Shows*, NBC NEWS (March 31, 2021, 4:56 PM), https://www.nbcnews.com/news/asian-america/asian-americans-are-least-likely-report-hate-incidents-new-research-n1262607 [https://perma.cc/DXK8-CRU5].

160. *New Report Finds Harassment & Mistreatment Fuels Mistrust Among LGBTQ People Toward Police*, ACLU (Apr. 30, 2024, 9:36 AM), https://www.aclu.org/press-releases/new-report-finds-harassment-mistreatment-fuels-mistrust-among-lgbtq-people-towards-police [https://perma.cc/8EG2-WECE].

161. James Factora, *Groundbreaking Study Reveals Transgender Asian Pacific Islanders Face Significant Discrimination*, THEM (Nov. 30, 2020), https://www.them.us/story/transgender-asian-pacific-islanders-face-significant-discrimination [https://perma.cc/K799-3MP3].

162. Davies, *supra* note 18, at 1.

163. *Id.* at 2.

164. Nina Wallace, *Photo Essay: Japanese American Mothers During WWII*, DENSHO (May 11, 2017), https://densho.org/catalyst/japanese-american-mothers-wwii/ [https://perma.cc/HUK8-MZ87].

165. Davies, *supra* note 18, at 17.

166. *Id.* at 17–18.

pregnant women dealt with hostile, inexperienced doctors and nurses, who were often not equipped with the appropriate medical equipment and would make several medical mistakes.[167] The women could not access adequate nutrition for themselves or their children, which led to their babies being born with underdeveloped immune systems.[168] The women were forced to suffer poor conditions in camp hospitals, which, in some cases, led to deaths during childbirth.[169]

WHY IS AN INTERSECTIONAL APPROACH IMPORTANT IN THE CONTEXT OF THE ANTI-CRITICAL RACE THEORY MOVEMENT?

An intersectional approach to teaching Asian American history would disprove the model minority myth, which has been weaponized to fight against the inclusion of critical race theory in school curricula. Critical race theory focuses on how racism is embedded in American society and forces a racial hierarchy, through the denial of access to resources, such as quality public education, to people of color.[170] For example, the racial wealth gap is marked by a $240,120 difference in wealth between the median White household and the median Black household.[171] Black families find it increasingly difficult to afford higher education, as evidenced by Black college and university enrollment dropping twenty two percent between 2010 and 2020.[172] Given that college graduates earned sixty one percent more than high school graduates in 2023,[173] this disparity in educational attainment only further cements the racial wealth gap. Kenny Xu, a lead insider on *Students for Fair Admissions v. Harvard*, claims that Asian American success disproves critical race theory. The Immigration and Nationality Act of 1965 replaced national origin quotas, which had limited immigration from Asian countries, with labor force and family reunification considerations, supposedly signaling the beginning of a meritocracy.[174] After all, following this legislation, Asian Americans have enjoyed a higher rate of postsecondary achievement compared to the national average and, subsequently a household median income that is 43%

167. Raquel Velasquez, Leslie Ruvalcaba & Samantha Ozorco, *A Walk Through the Life of a Mother at the Internment Camps*, OTTERPOD (2021), https://digitalcommons.csumb.edu/cgi/viewcontent.cgi?article=1006&context=otterpod [https://perma.cc/2ZTP-J6RB].

168. *Id.*

169. Wallace, *supra* note 164.

170. Adreienne D. Dixson & Celia Rousseau Anderson, *Where are We? Critical Race Theory in Education 20 Years Later*, 93 PEABODY J. EDUC. 121, 127 (2018).

171. Andre M. Perry, Hannah Stephens & Manann Donoghoe, *Black wealth is increasing, but so is the racial wealth gap*, BROOKINGS (Jan. 9, 2024), https://www.brookings.edu/articles/black-wealth-is-increasing-but-so-is-the-racial-wealth-gap/ [https://perma.cc/5M5Y-3KV2].

172. Jon Marcus, *The college degree gap between Black and white Americans was always bad. It's getting worse*, HECHINGER REP. (May 15, 2023), https://hechingerreport.org/the-college-going-gap-between-black-and-white-americans-was-always-bad-its-getting-worse/ [https://perma.cc/DU96-SEL4].

173. Marisol Cuellar Mejia, Cesar Alesi Perez, Vicki Hsieh, & Hans Johnson, *Is College Worth It?*, PPIC, https://www.ppic.org/publication/is-college-worth-it/ [https://perma.cc/NC5Y-FRMH].

174. Muzaffar Chishti & Jessica Bolter, *"Merit-Based" Immigration: Trump Proposal Would Dramatically Revamp Immigrant Selection Criteria, But with Modest Effects on Numbers*, MIGRATION POLICY (May 30, 2019), https://www.migrationpolicy.org/article/merit-based-immigration-trump-proposal-immigrant-selection [https://perma.cc/5FYJ-U6ZJ].

greater than the national median income.[175]. For example, Vietnamese refugees escaping political turmoil have been able to start successful businesses in the United States.[176] Asian Americans have supposedly thrived by embodying the core American principle, that anyone can pull themselves up by their bootstraps.[177]

Yet, Asian American parents have expressed concern about critical race theory being taught in schools, as the theory undermines the meritocracy that has allowed Asians to succeed in America.[178] Recently, Chinese parents protested when a math teacher in a largely non-White elementary school in Cupertino told his students to rank themselves according to their "power and privilege" on an identity map, claiming that the activity was teaching their children to be racist.[179]

However, Asian Americans have not surpassed or reached the same level of privilege as White Americans. An intersectional understanding of Asian American history will help students learn how racial discrimination interacts with other forms of oppression and how this phenomenon impacts Asian Americans' day-to-day lives. The model minority myth is not a reality and is manipulated by legislators to attack critical race theory.[180]

The model minority myth is dangerous especially when the anti-critical race theory educational movement is already rampant across California. Conservative groups, such as Reform California, have demanded the ban of critical race theory in schools. School boards have been granted wide discretion in these cases, as a Board's conduct is not considered to be offensive to the First Amendment so long as it is "reasonably related to legitimate pedagogical concerns." [181] This is a vague test that can be easily satisfied, as long as the curriculum is transmitted values deemed important by the community.[182] Placentia-Yorba Linda Unified, Visalia Unified, Paso Robles Joint Unified, Temecula Valley Unified, Ramona Unified, and Newport-Mesa Unified school districts have all passed measures restricting instruction about race, arguing that critical race theory is controversial and might cause discomfort and racial guilt among students. Even the recent adoption of the California

175. Dedrick Asante Muhammad & Maya Kurani, *Racial Wealth Snapshot: Asian Americans And The Racial Wealth Divide*, NCRC (Aug. 23, 2023), https://ncrc.org/racial-wealth-snapshot-asian-americans-and-the-racial-wealth-divide-2023/ [https://perma.cc/N5VY-W9VG].

176. Heather Hope, *"I am very proud to be Vietnamese, and I am proud to be American too" | Former Vietnamese refugees share their stories of success and resilience*, CBS8 (May 11, 2022), https://www.cbs8.com/article/news/community/our-community/former-vietnamese-refugees-share-their-stories-of-success-and-reslience/509-d0fa861c-b593-4957-877c-1813ab111fc3 [https://perma.cc/BR5F-Y4HB].

177. *See* Kenny Xu, *Asian Americans Debunk Critical Race Theory*, JAMES G. MARTIN CTR. FOR ACAD. RENEWAL (Aug. 25, 2021), https://www.jamesgmartin.center/2021/08/asian-americans-debunk-critical-race-theory/ [https://perma.cc/MD9A-486E].

178. *Author: 'Asian Americans Showed that Critical Race Theory Cannot Be True'*, THE HILL (July 23, 2021, 3:56 PM), https://thehill.com/hilltv/rising/563447-author-asian-americans-showed-that-critical-race-theory-cannot-be-true/ [https://perma.cc/M5BT-XZDL].

179. Helen Raleigh, *Asian Americans Emerging as a Strong Voice Against Critical Race Theory*, NEWSWEEK (Mar. 9, 2021, 6:00 AM), https://www.newsweek.com/asian-americans-emerging-strong-voice-against-critical-race-theory-opinion-1574503 [https://perma.cc/BYB6-9G35].

180. *See* Mari Matsuda, *Mari Matsuda: Critical Race Theory Is Not Anti-Asian*, XIN SHENG PROJECT (June 26, 2021), https://www.xinshengproject.org/post/crt-is-not-anti-asian [https://perma.cc/CP34-9ZHY].

181. Robin M. Steans, *Is Virgil Proper Fare For Public Schools?: The Application of Hazelwood v. Kuhlmeier to School Board Curriculum* Decisions, 1991 UNIV. CHI. LEGAL F. 413, 425.

182. *See id*.

ethnic studies mandate faced over 100,000 objections, many of which were based on the curriculum's reliance on critical race theory.

CALIFORNIA AS A NATIONAL MODEL

Policymakers can implement a revised Asian American history curriculum in other states as well. In recent years, several states, such as Wisconsin, Florida, New Jersey, and Illinois, have passed legislation requiring Asian American history to be taught in K-12 schools. Other states are looking to pass similar legislation: New York lawmakers have proposed a bill requiring the incorporation of Asian American, Native Hawaiian, and Pacific Islander history into school curricula,[183] and the Asian American curricular mandate introduced in Ohio has already received broad support.[184]

The general curricular framework proposed above for California can be adopted in every state by centering narratives of intersectional oppression faced by Asian Americans to fight against the sweeping stereotype of the model minority myth. However, each state should tailor its curriculum to the experiences of Asian Americans in that particular region. For example, Wisconsin's bill specifically includes Hmong history to account for the state's significant Hmong population, which makes up 29 percent of the state's Asian American population.[185] Incorporating this level of personalization in each state will require a significant amount of research. However, K-12 schools can draw support from local universities in adapting their curricula. Mirroring the relationship between UCLA and Los Angeles schools, other states have started similar collaborations. The Connecticut Department of Education has hired Jason Oliver Chang, the director of the University of Connecticut Asian American Studies Institute, to help revise social studies standards to include Asian American studies and remove problematic material that perpetuates Asian stereotypes. The new standards will be implemented across the state in 2025, when the Connecticut AAPI curricular mandate goes into effect. Chang now leads the Advanced Pedagogy Curriculum Lab, which brings together Connecticut K-12 educators, university students, and faculty to collaborate on community-engaged scholarship and create a curriculum that highlights AAPI experiences.[186]

Involving other states in this movement only becomes more important as the anti-CRT movement grows stronger. Between January 1st, 2021 and December 31st, 2022, federal, state, and local government officials introduced over five hundred anti-CRT measures, of which nearly half were adopted.[187] These measures affect more than twenty two million American public school children and prevent these important concepts from being taught

183. S. 5963A, 2023–2024 Sess. (N.Y. 2023).

184. Susan Tebben, *Social Studies Curriculum Receives Broad Support as Committee Continues Consideration*, OHIO CAP. J. (Dec. 18, 2023, 10:50 AM), https://ohiocapitaljournal.com/2023/12/18/social-studies-curriculum-receives-broad-support-as-committee-continues-consideration/ [https://perma.cc/PTP2-X4E4].

185. Sakshi Venkatraman, *Wisconsin Will Now Require Asian American History to Be Taught in Schools*, NBC NEWS (Apr. 5, 2024, 6:27 AM), https://www.nbcnews.com/news/asian-america/wisconsin-schools-require-asian-american-hmong-history-rcna146441 [https://perma.cc/NL6G-BHLK].

186. *See* Heather Borton, *Opening Eyes and Minds: UConn Experts Help Transform Connecticut K-12 Curricula*, UCONN TODAY (Dec. 7, 2022), https://today.uconn.edu/2022/12/opening-eyes-and-minds-uconn-experts-help-transform-connecticut-k-12-curricula/# [https://perma.cc/HJ89-PDT5].

187. Olivia B. Waxman, *Exclusive: New Data Shows the Anti-Critical Race Theory Movement Is 'Far From Over'*, TIME (Apr. 6, 2023, 5:00 AM), https://time.com/6266865/critical-race-theory-data-exclusive/ [https://perma.cc/QEK4-JMU3].

below the graduate level.[188] All states, both blue and red, have witnessed this pushback against critical theory.[189] Promoting an intersectional Asian American history curriculum will dismantle the model minority myth, demonstrate the prevalence of systemic racism, and reinforce the need for critical race theory in K-12 schools.

ISSUES IN IMPLEMENTATION: IMPORTANCE OF A DIVERSE TEACHING FORCE

While changing the K-12 curriculum can be impactful, it is equally important to recruit a diverse teaching force to deliver these lessons. Asian American teachers, who bring their own racialized experiences to classroom discussions, are themselves proof that Asian Americans are not a monolith and have complex intersectional identities. May Hara, an associate professor of education at Framingham State University and a former middle school English as a Second Language teacher, shares that she has often been the first Asian American teacher that her students had experienced. Furthermore, despite spending over ten years as a professor in a state with a 7.5 percent Asian population, she can count on one hand the number of Asian American students that she has taught.

Unfortunately, this experience is widespread. While Asians make up seven percent of the national population and are the fastest-growing racial group in the United States, only two percent of K-12 teachers are Asian American. The Asian American population is expected to rise to 35.8 million by 2060, so it is important now more than ever to recruit and uplift Asian American teachers who reflect this changing demographic. Hiring more Asian American teachers will increase test scores and graduation rates for Asian American students, who benefit from having a role model from their ethnic group to support their academic goals.[190] Asian American teachers also improve civic engagement and critical thinking skills among White students due to their exposure to multicultural perspectives.[191]

Change goes beyond hiring practices. Asian American teachers state that they often feel invisible at their schools. Michael Ida, a mathematics and computer science teacher in Honolulu, shares that Asian Americans are often excluded in professional environments and are not given an opportunity to speak during important meetings. He explains the Asian invisibility phenomenon, in which Asian American educators' individual ethnic identities are overshadowed by the invisibility experienced by Asian Americans as a whole. Asian American educators are often seen as interchangeable or even confused with one another, stripping them of their personhood. Yet, they are tasked with the responsibility of representing the interests of the Asian American community, since these concerns are not raised by other groups.[192]

188. *See id.*

189. Taifha Alexander, LaToya Baldwin Clark, Kyle Reinhard & Noah Zatz, *CRT Forward: Tracking the Attack on Critical Race Theory*, UCLA SCH. OF LAW, https://crtforward.law.ucla.edu/wp-content/uploads/2023/04/UCLA-Law_CRT-Report_Final.pdf [https://perma.cc/2TJM-659D].

190. May Hara, *I'm Almost Always the First Asian American Teacher My Students Have Had. That's a Problem*, WBUR (Aug. 22, 2023), https://www.wbur.org/cognoscenti/2023/08/22/representation-immigrants-asian-american-teachers-may-hara [https://perma.cc/F5FS-XXJU]; *see* Desiree Carver-Thomas, *Diversifying the Teaching Profession: How to Recruit and Retain Teachers of Color*, LEARNING POL'Y INST. (Apr. 19, 2018), https://learningpolicyinstitute.org/product/diversifying-teaching-profession-report [https://perma.cc/DEG3-DGG6].

191. Hara, *supra* note 190.

192. *See* Michael Paul Ida, *How My Voice as an Asian American Teacher Goes Unheard—and Why I Can't Speak Up*, EDSURGE (Jan. 31, 2024), https://www.edsurge.com/news/2024–01–31-how-my-voice-as-an-asian-american-teacher-goes-unheard-and-why-i-can-t-speak-up [https://perma.cc/6XJ9-C5D4].

The pandemic has only further brought these issues to light. On March 16, 2021, a 21-year-old White man in Atlanta killed eight people, the majority of whom were Asian women. The morning after, school administrators were largely silent. An Asian American K-8 teacher in Philadelphia shared that no one discussed the event in the daily morning meeting. An Asian American high school English teacher in upstate New York felt helpless like no one at work would understand what they were going through. Three Asian American educators in Boston chose to share their reactions to the event in a department meeting but were met with silence, with the discussion quickly shifting to the upcoming state-mandated test.[193] During a time of mourning and fear, Asian American teachers were left unsupported and ignored.

Supporting Asian American educators in teaching their histories is more critical now than ever, as anti-critical race theory laws are on the rise. 19 states have passed laws regulating the discussion of race and racism in schools, and this is affecting teachers' freedom in the classroom.[194] High school history teacher Mary McIntosh had to revise her curriculum after Tennessee passed a law prohibiting concepts related to systemic racism from being taught in the classroom – she is no longer able to introduce her students to Bryan Stevenson's memoir *Just Mercy*, which discusses the legacy of racism in the criminal justice system.[195] Even teachers in solidly Democratic states, such as California, are highly surveilled by parents and school board members who oppose critical race theory and are receiving criticism for lessons they have been teaching for decades.[196] These bans would impact the teaching of the historical oppression of Asian Americans.

There are various steps that schools can take to uplift Asian American voices. First, support Asian American leaders. Asian American administrators can bring an understanding of language and cultural barriers faced by the Asian American community and help address anti-Asian sentiment in schools.[197] Moreover, Asian Americans serving on school boards can oppose the curricular bans called for by anti-critical race theory advocates. Also, school districts can support Asian American administrators by sponsoring affinity groups for Asian American educators so they can work together to build a community and anti-racist curriculum.[198] One such group in New York, the Asian American Male Teacher Retention, Support, and Development Initiative, engages in rich discussions about anti-racist teaching, specifically about how the Asian perspective is unique compared to those of other identities.[199] The group also implements teacher-led initiatives, such as a

193. *See* Diana Lee, *Voices at the Center: Asian American Educators Rising*, EDSURGE (Dec. 12, 2022), https://www.edsurge.com/news/2022–12–12-voices-at-the-center-asian-american-educators-rising [https://perma.cc/3C3F-BP3B].

194. *See* Olivia B. Waxman, *Anti-'Critical Race Theory' Laws Are Working. Teachers Are Thinking Twice About How They Talk About Race*, TIME (June 30, 2022, 12:37 PM), https://time.com/6192708/critical-race-theory-teachers-racism/ [https://perma.cc/7U3X-J9SV].

195. *Id.*

196. *See id.*

197. Noah Cooc & Grace McHyun Kim, *Revisiting the "Decline" in Asian American and Pacific Islander* Teachers, 36 EDUC. POL'Y 1759, 1782–83 (2022).

198. *See* Denisa R. Superville, *Why Aren't There More Asian American School Leaders? Here's What We Heard*, EDUC. WEEK (Feb. 28, 2023), https://www.edweek.org/leadership/why-arent-there-more-asian-american-school-leaders-heres-what-we-heard/2023/02#:~:text=Less%20than%202%20 percent%20 of,teaching%20workforce%20in%20public%20schools [https://perma.cc/2588-NFTK].

199. *See* Gianna Cacciatore, *How Do We Get—and Keep—More Asian American Male Teachers?*, HARV. GRADUATE SCH. OF EDUC. (Aug. 24, 2021), https://www.gse.harvard.edu/ideas/ed-

"Stop Asian Hate" community hall.[200] Uplifting Asian American educators and administrators requires not only acknowledging but highlighting significant events that impact the Asian American community and everyday racialized experiences.

CONCLUSION

As ethnic studies and, more specifically, Asian American studies become more commonly incorporated into school curricula, schools should focus on portraying the Asian American diaspora in a holistic way, highlighting the intersectional oppressions faced by the community rather than perpetuating the model minority stereotype. This shift will play an important role in combating the anti-critical race theory movement that threatens discussions of race in the classroom. Once states have revised their curriculum standards, the next step is to connect with local Asian American communities to bring classroom discussions to life. For example, in Los Angeles, schools can collaborate with the AAPI Equity Alliance, a coalition of Asian American and Pacific Islander groups in Southern California.[201] For younger students, the alliance can conduct age-appropriate training on hate crimes and how survivors can access resources.[202] Older students can assist with the organization's policy advocacy, advocating in front of the Board of Education for measures like the Everyone Counts Resolution.[203] Through these experiences, schools can properly serve Asian American students, who deserve to see themselves accurately reflected in classroom materials and community engagement.

magazine/21/08/how-do-we-get-and-keep-more-asian-american-male-teacher [https://perma.cc/PVA9-EKAT].

200. *See id.*

201. *See Members*, AAPI EQUITY ALL., https://aapiequityalliance.org/members/ [https://perma.cc/Y54D-88LY].

202. *See Stop the Hate*, AAPI EQUITY ALL., https://aapiequityalliance.org/stop-the-hate/ [https://perma.cc/MM8N-EURK].

203. *See Policy Advocacy & Civic Engagement*, AAPI EQUITY ALL., https://aapiequityalliance.org/policy-advocacy-civic-engagement/ [https://perma.cc/U7WX-WPDU].