

November 9, 2009

Investing in Innovation (I3) Comments  
Office of Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 3W329  
Washington, DC 20202

Re: Document ID ED-2009-OII-0012-0001

To Whom It May Concern:

On behalf of the nation's 90,000 professional visual arts educators, the National Art Education Association offers the following recommendations to strengthen the guidelines for the *Investing in Innovation (i3) Fund*.

Visual arts educators fully support and applaud the four core reform priorities identified by Secretary Duncan. However, to ensure equitable student access to a full and balanced education that is relevant to the 21st Century, *all core subject areas must be emphasized equally throughout all funding initiatives*. Current statute names the arts as a core academic subject and the reference to core academic subjects included in several sections in the guidelines is important.

We are also encouraged that Secretary Duncan has stated that applications that involve arts education might be suitable for this program. During the October 6, 2009 webinar convened by the U.S. Department of Education, Secretary Duncan indicated that "...The (I 3) competition will provide (seed) money for fresh ideas, help grow promising programs with a good track record and scale up programs with proven results at a national level....Entrepreneurial non-profits will be able to join with school districts to add the best new ideas into the system or help scale their homegrown innovations....Some will find ways to establish a network of new schools or develop models that turn around low performing schools...*Others might explore how to engage children in the arts to help them improve*. We want the best ideas to move us forward. We will be investing in great work to scale up existing programs that have already shown success, can validate ones that need to establish evidence of their success or to develop new ideas to determine their potential." (see transcript of 10/6/09 webinar)

After careful review, the draft guidelines may provide thresholds for participation that are too ambitious for nonprofit cultural organizations to achieve making it difficult to garner support from school district partners thereby reducing opportunities for students to acquire critical skills in creativity, problem-solving, and innovation through learning in the arts. The development of these skills is increasingly recognized as essential for all students if our schools are to deliver a high-quality, 21st Century education that ensures our nation's ability to successfully compete in a global economy.

**The Required Funding Match, Achievement Objectives and Eligibility Size Expectations will Inhibit Arts Participation in I3**

Specific recommendations are offered relative to these thresholds:

### ***I. Eligible Applicants***

The I3 draft guidelines include sections that call for an applicant to have achieved certain objectives according to No Child Left Behind annual yearly progress (AYP). The AYP progress sections may be removed by legislative language in the FY2010 education appropriations bill – we support that removal.

### ***II. Cost Sharing or Matching***

The guidelines appear to call for LEA's and their partner nonprofits to demonstrate the ability to secure 20 percent matching funds. For a \$5 million grant, the grantee must present \$1 million in matching funds, including in-kind support. The current economic climate has severely reduced grants from the private sector for nonprofits. In the best of economic times a \$1 million grant award would be unusual for a handful of arts education programs to receive across the country. The three thresholds presented through this program would make meeting the match requirements for even the development grants a significant, if not unattainable, challenge for most nonprofits and their school district partners to reach and identify funds to sustain the programs over time.

One of the unanticipated impacts may make it all but impossible for arts education organizations to apply for these funds unless they are already among a handful of programs that have been receiving foundation and government support within the last decade. The Investing in Innovation fund has the potential to provide an opportunity for many other exemplary nonprofit and school district partnerships to receive the kind of leverage funding that only these programs have been able to secure. In order for the vast number of other noteworthy programs which have been developed in the last few years to be eligible for consideration, it will be essential to reduce the matching requirement. Doing so will enable the department to receive a healthy pool of arts education applications, in keeping with what has been publically mentioned regarding the opportunities that this fund can provide for looking at the ways in which the arts can teach creativity and innovation in our public schools.

### ***III. Impact and Size Expectations***

The guidelines, as drafted, include sections that appear to discourage small and mid-sized nonprofits from applying. The Regulatory section is confusing as it states that very few nonprofits with revenue of under \$7 million would be "interested" in applying for these funds. Specifically, grants are expected to reach a minimum of 100,000 students (page 52216). Nonprofit arts organizations working with whole school initiatives rarely reach 100,000 students. Even those with successful interventions working with whole schools and school districts are not working with all of the students in even the large urban districts or county-wide systems with student populations of 100,000. While some services and interventions might reach all students at one time per school year, these types of proven, in-depth interactions reaching faculty, arts specialists, and community-based organizations have stressed quality vs. quantity in making an impact in low performing schools and reaching high-needs students.

The guidelines indicate that 12,848 of the nation's school districts do not meet this threshold, and consequently, "the Secretary believes that only a small number of these entities would be interested in applying for funds under this program" (page 52228). Staffing levels of nonprofit organizations are not of a size to scale up to serve 100,000 students across numerous districts in advance of securing these types of funds. In fact, consideration of models for arts education working at this size and scale would not only be limited for the purposes of this funding program but would more than likely provide unworkable models for replication in all but a few other settings.

As the guidelines currently stand, these thresholds are prohibitive to the arts education sector and as noted, may be counterproductive to innovation. Thank you for your thoughtful consideration of these recommendations.

Sincerely,

National Art Education Association Executive Committee

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