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Ms. Margo Anderson Associate Assistant Deputy Secretary Office of Innovation and Improvement U.S. Department of Education 400 Maryland Avenue SW, Room 4W311 Washington, DC 20202

Docket ID ED-2013-OII-0146

Dear Ms. Anderson:

Thank you for the opportunity to comment on the Department's June 24, 2014 Federal Register Notice regarding "Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs."

Created in 1989, Grantmakers in the Arts (GIA) is the only national association of private and public funders focused on making grants to artists and arts organizations in America. GIA's strength is in its diversity of members: private, family, community and corporate foundations; national, state and local governmental agencies: nonprofit national, regional and local service organizations. Grantmakers in the Arts also supports the Arts Education Funder's Coalition which consists of 131 individual members representing 110 organizations from 41 states and makes grants to schools and arts organizations for education purposes. As a group of funders who have contributed millions of dollars to the public education system or to the nonprofit arts sector to compensate for lack of arts education in public schools, coalition members and other funders have a stake in developing effective policy that will secure the place of arts education in twenty-first century education.

In general, we support the proposed priorities and definitions that are intended to replace the current supplemental priorities for discretionary grant programs that were published in 2010. We specifically support the inclusion of Priorities: 1 (Improving Early Learning and Development Outcomes); 2 (Influencing the Development of Non-Cognitive Factors); 4 (Improving Academic outcomes for High-Need Students); 12 (Promoting Diversity); 13 (Improving School Climate, Behavioral Supports and Correctional Education); and 14 (Improving Parent, Family and Community Engagement).

Priority 1—Improving Early Learning and Development Outcomes

We strongly support the President's request to help states make high-quality preschool available to all students. According to the Office of Head Start, a growing body of research on the effects of early arts experiences shows their positive relationship to improved, overall academic performance. Research in the arts also demonstrates that when creativity is developed at an early age, its benefits are continual and are transferred to many intellectual tasks (Arts Education Partnership, 2000).

In fact, the importance of creative arts has already been recognized in early childhood programs through Head Start. Domain 5 of the Head Start Child Outcomes Framework identifies four elements: art, music, movement, and dramatic play. In addition, both the Senate and House bills, entitled the Strong Start for America's Children Act of 2013, list "creative arts expression" as a required element under the "approaches toward learning" domain of school readiness. To this point, we strongly encourage the Department of Education to ensure the concepts in the Senate and House bills are reflected in the proposed definition of "Essential domains of school readiness."

Priority 2—Influencing the Development of Non-Cognitive Factors

We strongly support the recognition that non-cognitive factors play an important role in a students' academic, career and life outcomes. This priority is particularly important given the intent of the Department for the priorities to span students' full academic and career trajectories. Today, employers are interested in identifying skills and competencies of potential employees that go beyond reading, writing and mathematics. They want to know if students have skills such as creativity, writing, teamwork, and critical thinking. These skills are all developed through high-quality arts education.

Priority 4—Improving Academic Outcomes for High-Need Students

We strongly support the Department's commitment to equity for all students with a particular focus on high-need students and students in the lowest performing schools. Arts education can and does play an important role in improving academic outcomes for these students. Two studies by James Catterall found significant advantages for "arts engaged low-socioeconomic status students" in college going and types of employment, as well as strong advantages in volunteerism and voting. In addition, gainful employment for this group of students included better jobs with higher pay, more responsibility, more promotion opportunity, and more employee satisfaction.

The California Alliance for Arts Education has also noted that a substantial body of research demonstrates that certain forms of arts education can be an asset to schools and districts working to improve students' achievement in English Language Arts and mathematics. Studies find that integrating the arts with instruction in other academic subjects—for example, teaching skills and content of drama and English Language Arts in tandem—increases student learning and achievement and helps teachers more effectively meet the needs of all students.

The President's Committee on the Arts and the Humanities (PCAH) has also developed, in cooperation with the U.S. Department of Education and the White House Domestic Policy Council, the Turnaround Arts initiative to narrow the achievement gap and increase student engagement through the arts. Turnaround Arts currently works in 35 schools across the country, in 25 school districts and 11 states. Interim evaluation results on the pilot phase of Turnaround Arts schools showed that participating schools demonstrate improved academic performance, increased student and parent engagement and improved culture and climate, often outperforming comparable schools in their district or state.

In addition, PCAH recently announced it will expand its successful Turnaround Arts initiative. The expanded program will be working in 35 schools in districts in California, Colorado, Connecticut, Illinois, Iowa, Louisiana, Massachusetts, Minnesota, Montana, Oregon and Washington D.C., with plans to expand to up to 60 schools across the country. All schools participating in Turnaround Arts will receive training and resources to address their individual needs. Resources will include a summer leadership program, in-school professional development, partnerships with community arts education and cultural organizations, art supplies and musical instruments.

Priority 12—Promoting Diversity

We strongly support the focus of Priority 12 on decreasing the racial, ethnic and socioeconomic isolation of students. Unfortunately, arts education is often the first thing taken away from low-income students, particularly in Title I schools, in order to gain time and monetary savings. Given the benefits of arts education outlined in numerous studies (as indicated in our response to Priorities 4 and 13), we urge the Department to consider augmenting Priority 12 by including the concept of *access* to arts education and other approaches that reduce socioeconomic isolation of students.

Priority 13—Improving School Climate, Behavioral Supports and Correctional Education & Priority 14—Improving Parent, Family and Community Engagement

According to the California Alliance for Arts Education, studies have found that both integrated and non-integrated forms of arts education help to transform the learning environment in schools by fostering student engagement, attendance, and motivation to learn, and improving school culture and climate. The Turnaround Arts Initiative also provides a good example of the role of arts education in Priorities 13 (Improving School Climate, Behavioral Supports and Correctional Education) and 14 (Improving Parent, Family and Community Engagement). According to PCAH, studies show that when students participate in the arts they are more engaged and cooperative with teachers and peers, and are more self-confident and better able to express their ideas. Arts education also encourages parent, family and community engagement by providing additional opportunities for students and their families to access the arts through district and school partnerships with museums and artists. Because of these partnerships, we strongly encourage the Department to specifically highlight museums, cultural organizations and other art venues in their definition of "community engagement" and "sustained partnerships."

Thank you for allowing us the opportunity to comment on the Department's proposed priorities and definitions and for your consideration of these comments.

Sincerely,

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Janet Brown President and CEO