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January 14, 2013

Ms. Carol Lyons
U.S. Department of Education
400 Maryland Avenue, SW
Room 4W203, LBJ
Washington, DC 20202-5930

Docket ID: ED-2012-OII-0027

Dear Ms. Lyons:

Thank you for the opportunity to comment on the Department's December 14, 2012 Federal Register Notice for proposed priorities, requirements, definitions and selection criteria for the Investing in Innovation Fund (i3). This is a critical program that has supported the further development and scaling up of important education reforms.

The Arts Education Funders Coalition is an effort by concerned arts and education private, public and corporate grantmakers to promote equitable access to arts education in all public schools. As 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 have a stake in developing effective policy that will secure the place of arts education in twenty-first century education.

Several successful applicants targeted arts education as their focus on their i3 applications. While some of these applicants have been successful at attaining i3 grants, the program as a whole has not leveraged the impact that arts education can have in increasing student achievement and turning around low performing schools.

In order to facilitate a more robust and effective opportunity for innovative and effective proposals that utilize the arts to engage and enhance learning, we make the following recommendations to the proposed priorities in the notice (additions in bold):
Priority 3 - Improving Low Performing Schools

In priority area (a):

(a) Designing whole-school models that incorporate such strategies as providing strong school leadership; strengthening the instructional program, **including the use of arts education to academically engage students, especially low-income students**; embedding professional development that provides teachers with frequent feedback to increase the rigor and effectiveness of their instructional practice; redesigning the school day, week, or year; using data to inform instruction and improvement; establishing a school environment that promotes a culture of high expectations and addresses non-academic factors that affect student achievement; and providing ongoing mechanisms for parent and family engagement

At the end of the priority areas in Priority 3, add the following new priority area:

(h) Developing arts education programs and improving the skills of arts educators to engage students with the purpose of increasing student academic achievement, especially among low-income students.

Arts education has become a powerful focus of many school turnaround efforts. A major effort by the President's Committee on the Arts and the Humanities, the Turnaround Arts Initiative, has put arts education on the map as a central component of school improvement in the nation's worst performing schools. This project is taking on the academic challenges of eight schools across the country through a systemic and rigorous focus on arts education. Our additions to the i3 priority areas in Priority 3 would allow similarly focused efforts to be supported through i3 funding.

We thank you for the opportunity to comment on the priorities of this important initiative and for considering our comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Janet Brown", with a long, sweeping horizontal line extending to the right.

Janet Brown
Executive Director