

January 21, 2016

Ms. Deborah Spitz
U.S. Department of Education
400 Maryland Avenue SW.
Room 3E306
Washington, DC 20202

Submitted Via: Federal eRulemaking Portal: <http://www.regulations.gov>

Docket Number: ED-2015-OESE-0130

Re: Programs under Title I of the Elementary and Secondary Education Act of 1965

I submit this statement on behalf of the Performing Arts Alliance (PAA) in response to the request by the U.S. Department of Education (80 FR 79528) regarding implementing programs under Title I of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act (ESSA).

PAA is a multi-disciplinary coalition of 15 national service organizations from the professional nonprofit performing arts field. PAA advocates for national policies that enhance and foster the contributions the performing arts make to America.

Our members include:

| | |
|--|--|
| Alternate ROOTS | National Alliance for Musical Theatre |
| American Composers Forum | National Association of Latino Arts and Cultures |
| Association of Performing Arts Presenters* | National Performance Network |
| Chamber Music America | Network of Ensemble Theaters |
| Chorus America | New Music USA |
| Dance/USA* | OPERA America* |
| Fractured Atlas | Theatre Communications Group* |
| League of American Orchestras* | *Founding Members |

Within PAA are community-based performing arts organizations and artists, ensembles, collectives, and more who partner with parents, educators, and local K-12 schools to provide arts learning opportunities. Many artists and arts organizations advocate for all students to have equitable access to a complete education that includes the performing arts and will be active participants with school and community stakeholders throughout local and state implementation of ESSA.

In its definition of a “Well-Rounded” education, ESSA recognizes music and the arts as essential to a complete education for all students. This designation enables states and local school systems to use Title I resources to support access to arts education in the full array of arts disciplines. Guidance from the U.S. Department of Education should specify to states that arts education is an eligible expenditure of Title I funds so that there is no ambiguity on this point.

A growing body of rigorous research demonstrates that arts education can both improve student success and transform learning environments. However, the U.S. Department of Education’s 2012 Fast Response Statistical Survey, *Arts Education in Public Elementary and Secondary Schools: 1999-2000 and 2009-10*, found that the highest poverty schools in our country have the least access to arts education.

In regards to annual state report cards, Section 1111 of ESSA specifies that states may report “any additional information that the State believes will best provide parents, students, and other members of the public with information regarding the progress of each of the State’s public elementary schools and secondary schools.” The U.S. Department of Education should strongly encourage states to be publicly transparent regarding the pervasive gaps in access to arts education in Title I schools.

Regarding statewide accountability systems, Section 1111 of ESSA specifies that states may reference measures of student and educator engagement as well as school climate as they improve student academic achievement and student success. U.S. Department of Education guidance can present examples of how the arts are effective in meeting these Title I goals. Examples can be found in the projects supported by the Department’s own Arts Education Model Development and Dissemination program and Professional Development for Arts Educators program. Both programs have supported projects yielding evidence of improved student achievement and projects demonstrating the capacity of the arts to improve the climate for teaching and learning.

Regarding student assessments, Section 1111 of ESSA requires states to “involve multiple up-to-date measures of student academic achievement.” This may include measures “that assess higher-order thinking skills and understanding, which may include measures of student academic growth and may be partially delivered in the form of portfolios, projects, or extended performance tasks.” The assessment frameworks that accompany arts standards can be presented by the U.S. Department of Education as dynamic examples of portfolio- and performance-based practices in measuring what students know and are able to do. These examples can serve as helpful resources to states as they develop new assessment strategies for all subjects that contribute to a complete education.

In support of ESSA’s goal of providing equitable access to a complete education, we urge the Department to collect and disseminate full and complete statistics on the condition and progress of arts education in its routine data collection instruments. We also urge the Department to more frequently implement the National Assessment of Educational Progress in the Arts once every five years in grades 4, 8, and 12.

Thank you for the opportunity to submit written comments for the record. We and our member organizations also look forward to partnering with stakeholders at the state and local levels to advance a complete education for all students. Please feel welcome to contact Cristine Davis, General Manager of the Performing Arts Alliance, for further information (202.207.3850).

Sincerely,



Mario Garcia Durham
Board Chair
Performing Arts Alliance