March 23, 2018

Tomakie Washington,
Acting Director, Information Collection Clearance Division, Office of the Chief Privacy Officer, Office of Management

RE: Docket ID number ED-2017-ICCD-0133

Dear Acting Director Washington:

The National Association for Music Education (NAfME) advocates at the federal, state, and local levels to educate elected officials and other key decision makers about the impact and importance of music education programs. Representing 131,000 music educators, students, and advocates, NAfME is dedicated to ensuring the access, presence, and perseverance of quality music and arts programs that is operated by certified music educators, for all students across the nation, regardless of circumstance. Together, we are changing the national conversation about music’s role in delivering an outstanding education to all students.

Thank you for allowing us to respond to the Agency Information Collection Activities; Proposals, Submissions, and Approvals: Agency Information Collection Activities; Comment Request; Consolidated State Performance Report Part I and Part II.

In a bipartisan fashion, Congress passed, and the president enacted, the Every Student Succeeds Act (ESSA). ESSA makes clear that students should have a “well-rounded education,” including music. ESSA does not simply mention well-rounded education as a good idea; this language stipulates that Congress expects schools to act on those words and offer a broad and complete curriculum to all students. Schools are required to assess their ability to provide a well-rounded education, and we must achieve this goal with effective and thorough data collection and analysis.

To this end, we have created a draft template for the Consolidated State Performance Report. This template is supported and endorsed by the State Education Agency Directors of Arts Education (SEADAE), Educational Theatre Association, National Dance Education Association, and several members of the Music Education Policy Roundtable. We have used the report template that the Department of Education has used over the last several years, and added components that will be helpful in evaluating a well-rounded education, including music and the arts:

• Music and the Arts Student Participation in Title I, Part A Targeted Assistance Programs by Instructional Services. (Page 6)
• A section on Schoolwide Program Design Title I, Part A which includes activities to support a well-rounded education, mental health programs, early intervention services for problem behavior, and professional development. (Page 10)

• Number of eligible migrant children who received MEP-funded instruction in well-rounded subjects (Page 31)

• LEA Use of Rural Low-Income Schools Program, (Title VI, Part B, Subpart 2) Grant Funds for a well-rounded education (Page 52)

• Data collection for the Student Support and Academic Enrichment Grants (Title IV, Part A) (Page 57)

We believe these additions will serve as a good starting point in providing the aggregated data necessary so states and the Department of Education can analyze the access students have and their level of participation in a well-rounded education.

We appreciate the opportunity to provide comments and commend you on your commitment to collecting quality aggregate data to better our school systems and to uphold the intent of Congress in the creation of the Every Student Succeeds Act. Please let us know how we can continue to provide you with any help and resources you need as you enhance your data collection activities.

Sincerely,

Lynn Tuttle
Director of Public Policy, Research, & Professional Development
National Association for Music Education (NAfME)

Music Education Policy Roundtable Endorsements:

Progressive music
Quadrant
Gordon Institute for Music Learning
Music for All
Phi Mu Alpha Sinfonia
American Orff-Schulwerk Association
Drum Corps International
National Association of Music Merchants
League of American Orchestras