



**Re: ED-2016-OESE-0032-0001**

July 25, 2016

Ms. Meredith Miller  
U.S. Department of Education  
400 Maryland Avenue, SW – Room 3C106  
Washington, DC 20202-2800

Dear Ms. Miller,

We are writing on behalf of the Association of Art Museum Directors (AAMD) and the American Alliance of Museums (AAM) with respect to the Notice of Proposed Rulemaking ED-2016-OESE-0032-0001. AAMD includes the directors of over 200 major art museums in the United States, all of whom regard education as the central focus of their public service mission. Representing more than 30,000 individual museum professionals and volunteers, institutions and corporate partners serving the museum field, AAM is the only organization representing the entire scope of the broad museum community.

The Department of Education is to be commended for spelling out that community engagement is an important part in the process of formulating state and local plans. According to our data, art museums in the U.S. serve approximately 40,000 schools in a given year, with programs ranging from a single visit by a single classroom to whole-school intensive programs that take advantage of the myriad teaching and learning opportunities offered by museum collections and museum educators. If one considers history, science, children's, and specialty museums, not to mention living collections such as zoos, aquariums, botanical gardens and arboretums, it's clear that the museum field has enormous expertise – both in content and pedagogy – to offer state and local education agencies as well as individual schools. We look forward to urging our member museums to take an active role in the planning process. Thank you for the opportunity to do so.

On another matter, we note that § 299.19 “Supporting All Students” omits arts from the list of subjects that comprise a well-rounded education, and for which state plans must describe strategies, rationales and timelines to attain equitable access. The omission is apparently inadvertent, since the list otherwise encompasses all of the subjects, including music, that are named in Section 8002 of the Every Student Succeeds Act, which defines “well-rounded education.” We hope and expect that the final Rule will include “arts” in such a list.

We further urge the Department to ensure that the term “arts” includes the final “s”, which is the usage that Congress employed in Section 8002 and which indicates the true breadth of the field. Recent communications from the Department have used “art” and “arts” interchangeably; while this imprecision may be inadvertent, it has led to some confusion in the field, and is easily corrected.

We deeply appreciate the Department and Secretary King's commitment to ensuring access to a well-rounded education for all students.

Sincerely,

Handwritten signature of Christine Anagnos in black ink.

Christine Anagnos  
Executive Director, AAMD

Handwritten signature of Laura L. Lott in black ink.

Laura L. Lott  
President and CEO, AAM