

January 14, 2013

Office of Innovation and Improvement
Attention: Investing in Innovation Comments
U.S. Department of Education
400 Maryland Avenue, SW, Room 4W321
Washington, DC 20202

Re: Investing in Innovation Fund Priorities

To Whom It May Concern:

The undersigned civil rights organizations and scholars are pleased to submit comments on the “Proposed priorities, requirements, definitions, and selection criteria” for the Department of Education’s Investing in Innovation Fund, 77 Fed. Reg. 74407 (December 14, 2012) (hereinafter, “i3 Fund”)

As indicated in our earlier comments on the “i3” Fund (submitted November 9, 2009)¹ and (February 9, 2011)², we believe that the Department, in neglecting to include “promoting diversity” as a priority to be used in evaluating i3 grant applications, has once again missed an important opportunity to promote greater inclusion and educational equity. The continued absence of this priority is especially significant in light of the Department’s commitment to “promoting diversity” in its list of proposed priorities for discretionary grant programs (most recently updated at 76 Fed. Reg. 27637, May 12, 2011).

If school diversity is a Departmental funding priority, why is it excluded from the Investing in Innovation Fund? While we recognize that every priority is not applicable to every discretionary grant program, the i3 Fund, with its focus on new strategies and support for scaling up smaller efforts, is an ideal program in which to include the “promoting diversity” priority.

Like the other current priorities for the program (including Improving Low-Performing Schools; Improving Science, Technology, Engineering, and Mathematics (STEM) Education; and Improving Academic Outcomes for English Learners), the “promoting diversity” priority could yield a number of quality applicants and lead to the strengthening and scaling up of successful racial and socioeconomic school integration efforts. The i3 Fund was created to provide grants to applicants with “a record of improving student achievement” in order to foster the implementation and growth of innovative practices that have been demonstrated to improve student achievement and growth, close achievement gaps, decrease dropout rates, increase high school graduation rates, and increase rates of college enrollment and completion. By excluding “promoting diversity” as a proposed priority, the Department ignores compelling research that demonstrates that racial and socioeconomic integration can have a powerful impact on student academic success.³

¹ www.school-diversity.org/pdf/InvestinginInnovation.pdf.

² www.school-diversity.org/pdf/i3_comment_letter-2-9-2011.pdf.

³ As referenced in our November 9, 2009 letter, please see Roslyn Mickelson, *Twenty-first Century Social Science on School Racial Diversity and Educational Outcomes*, 69 Ohio St. L.J. 1173 (2008).

We encourage the Department to revise the proposed priorities for the i3 Fund to include “promoting diversity” as either an absolute or competitive preference priority. An analysis of the highest-rated applicants in the 2010 competition revealed that winning applications addressed all of the absolute and competitive priorities articulated by the Department.⁴ Without this designation, it is unlikely applicants in the 2013 competition will pay attention to this goal and applicants proposing projects that include integration as a goal will have no competitive advantage for funding.

Thank you for the opportunity to present these comments. Please let us know if you need additional information. We would be happy to consult with the Department further on the issues addressed in this letter.

Sincerely,

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⁴ Department of Education, “Frequently Asked Questions Regarding the 2010 Highest-Rated i3 Applicants,” (August 11, 2010).

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