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Location of the Institute of Museum Services
In the Federal Government

In the legislation creating the Institute of Museum Services (IMS), the Senate bill placed IMS within the National Foundation for the Arts and the Humanities on an equal footing with the Arts and the Humanities Endowments, while the House bill placed IMS in the Department of Health, Education, and Welfare (HEW) as an agency reporting directly to the Secretary. In the Conference Committee, the House version on this point carried, and the Secretary of HEW delegated responsibility for IMS to the Assistant Secretary of Education. If, as now seems likely, a Department of Education is created, IMS is scheduled to be transferred to the new Department.

Since legislation reauthorizing IMS for another five years will soon be considered by Congress and since the Institute now has nearly two years of experience on which to evaluate its location in the Federal government, it would be appropriate to now consider three primary options regarding the placement of IMS. (It should be noted that because IMS is unique to HEW, the Department's officials have indicated they will not contest efforts to relocate IMS outside of HEW or the new Department of Education.)

Following is a list of advantages and disadvantages of placing IMS within the National Foundation, the Department of Education, or the Smithsonian Institution.

Option #1: IMS re-locate within the National Foundation for the Arts and Humanities, which would become the National Foundation for the Arts, Humanities, and Museums (NFAHM).

Advantages:

1. Museums are closely allied in discipline, content, spirit, and intent to the various categories ascribed to each of the two Endowments.
2. If IMS becomes a third Endowment, it will be able to combine the educational function and the cultural heritage role without making one subordinate to the other.
3. The two Endowments are presently engaged in programs of museum support. Nonetheless, nearly 85% of those museums which qualify under the IMS legislation do not receive Federal funding from the Endowments. IMS would be able to coordinate those museum support activities with the operations support now provided by the Institute.

4. Autonomy would be far greater in the National Foundation. The Institute could go to the Office of Management and Budget (OMB) and the Hill directly, like its two senior colleagues, without bureaucratic layers of intervention. Access to the White House would also be enhanced.
5. While education would continue to play a major role in the policies of IMS, its definition would be somewhat broader (e.g. informal learning, random-access learning resource centers, etc.) than that within the Department of Education which, in practice if not in principle, equates education with schooling. That breadth is appropriate to the definition of education supported by the policies of the two Endowments.
6. Although school systems represent a vast financial resource that museums ought to have access to, the fact is that this is unlikely on any large scale. Thus, museums assume a role not unlike that of symphony orchestras vis-a-vis the Humanities Endowment; that is, educational opportunities as deficit operations.
7. IMS would continue to coordinate with the new Department of Education on programs applicable to museums as well as with other Federal agencies.
8. The feasibility of maintaining information and computerized grants control systems is most desirable and would be easier to facilitate within a triumverate.
9. Pluralistic funding sources for museums would remain as outlined in the Federal Council on the Arts and the Humanities Museum Agreement.
10. It makes sense to house the three independent cultural funding agencies under one roof.
11. The two Endowments and IMS would be kept on the same legislative tract for reauthorization, since they are all part of the Arts and Humanities Cultural Affairs Act of 1976.
12. Cooperation between IMS, NEA, and NEH, already at a high level, would be further enhanced by this move.
13. The Senate has consistently supported placing IMS within the Foundation.
14. Layers of approval and outside reporting requirements placed on IMS would be considerably reduced by this move.

15. IMS and its budget are now sufficiently established to allow the agency to become independent within the Foundation.
16. Quicker service to the applicants, grantees, and profession by eliminating bureaucratic procedure which hamstring all the processes from mail to Federal regulations, to guidelines, program packages, Application Control Center, grants procedure, to disbursement of funds and evaluation of successful awardees.
17. IMS supports education in museums not as a pedagogical process, but as content. Traditionally, Federal funds for education are based on assisting educational procedures, not on improving or enhancing the content of what is taught.
18. IMS, similar to the Endowments, stimulates the private sector with Federal funds, whereas HEW has no such history of funding.

Disadvantages:

1. The two Endowments are presently coming under a great deal of scrutiny. The independence, autonomy, and lack of controls that they have previously enjoyed may become more and more prescribed and may apply to IMS.
2. IMS might absorb some of the existing museum programs within the Endowments.
3. Education might not take as high a priority as it would in the Department of Education.
4. There would be a loss of support services available to IMS. The cost of replacing these services would be about \$500,000 per year.

Option #2: IMS remain within HEW and transfer into the Department of Education if it is established.

Advantages:

1. Education has provided museums with the single most important stimulus for development in recent history. Museum growth can usually be correlated with the growth of the education function. Since museums have become the paradigm of "informal" learning settings, the agency which serves museums would be best located within the education arm of the government.
2. The placement of IMS within HEW is itself testimony to

the Federal recognition of the growing educational role of museums.

3. IMS would be a sister among a family of education agencies, the collective budget of which exceeds \$10 billion. Benefits could travel horizontally.

Disadvantages:

1. Museums, as alternative education institutions, will always take a back seat to the school system in terms of access to resources, local or Federal. Thus, while cooperative relationships with the schools are desirable, museums (and the agency serving them) will be bound to receive a much smaller percent of the resources in relationship to their services. It would be better to be free from the subordinate position among other education agencies within the Department.
2. Proximity to education funding does not mean sharing those dollars. The most powerful education constituencies, the National Education Association and the American Federation of Teachers, would not support such diffusion of Federal education dollars.
3. Although HEW has been responsive to IMS, the new agency represents a miniscule portion of the HEW budget. The IMS FY '79 budget is \$7.7 million. The FY '79 HEW budget is \$182 BILLION. By virtue of size and newness, IMS is subject to the wills of the larger agencies within HEW. A comparable situation would exist within the new Department of Education.
4. While education is an important and necessary function of a museum, it is not necessarily the primary function. Of great importance is the acquisition/conservation/preservation/storage functions. Museum support ought to be offered in areas other than education, lest the constituency be led away from its other important functions. Within HEW or the Department of Education, IMS would be obliged to stress its educational policy base. This runs counter to the operational support mandate (as distinct from categorical, e.g. education, or special services). This implies a down-play of the role of museums as "Cultural Institutions".
5. The 1977 Senate Committee Report did not favor either HEW or the Department of Education as the most suitable home for IMS. There is reason to believe that its sentiment is still the same.
6. The political history of the creation of IMS is such

that certain decision-makers felt that they could terminate IMS by placing it within HEW. Some of those sentiments still linger.

7. Housing IMS within any large bureaucracy is generally counterproductive administratively. Every memo, guideline, initiative, contract, etc. must be run through a complex and basically obstructionist process.
8. IMS is losing its funding access flexibility. When a budget ceiling is placed upon HEW (or a Department of Education), the agency within such a department must also hold its own budget at a specified level or penalize another sister agency for its own growth. That is the case at the present time. The larger the hierarchy of decision-making above IMS, the more obstructions exist for serving the intended constituency.
9. While HEW and the new Department have cabinet level connections with the White House, IMS' concerns might receive a low priority within the new Department of Education, thereby suggesting access in an independent agency may be an improvement.
10. IMS' general operating support program is unique. HEW and the Education division offer no precedents for the program, application forms, computer systems, and have generally been unable to relate to and support adequately the unique needs of IMS.
11. It would be extremely difficult to administer the Institute's proposed multi-year funding program (Cornerstone Grants Program) within the existing HEW/Education Division administrative constraints, requirements, and grants and contract procedures.
12. The many reporting requirements placed on IMS by HEW deter the Institute from its prime mission.

Option #3: IMS relocate within the Smithsonian Institution.

Advantages:

1. Instant identification with a leading national museum institution.
2. Considerable advocacy power on the Hill.

Disadvantages:

1. The Smithsonian Institution is one of 5,500 museums in the United States. By delegating museum authority to

it, the field would resent having one museum decide the fate of a national museum funding program.

2. When the IMS legislation was being developed, its supporters and museum professionals rejected the idea of placing it within the Smithsonian for fear that the broad interests of the national museum community would be subordinated to the special interests of the Smithsonian. That feeling still prevails.

3. Since the Smithsonian Institution is not a Federal agency, it is difficult for it to dispense grants even when it would be through IMS' program.

4. Duplication between IMS and the National Museum Act (NMA) program would be difficult to avoid. There would be concern that IMS might absorb NMA.

5. Currently, IMS funds museums which may cooperate with the Smithsonian for purposes of programming. If IMS were under the Smithsonian, any such awards could constitute a conflict-of-interest in that the Institute was making awards which ultimately benefitted the Smithsonian as the cooperating institution.

6. Concern that education will not take as high a priority as it would in the Education Department.

7. The Smithsonian, by virtue of its tenure, has become entrenched in procedural and institutional issues, and thus lacks the necessary flexibility of a new, vital, and dynamic agency.

5/24/79

→ To me, this is the most compelling (and very real) disadvantage.

an accurate assessment