

Supporting Statement Grant Application Guidance Survey

Introduction

This request is for a revision to the currently approved collection of information for the Grant Application Guidance Survey (OMB Control Number 3135-0133; see Attachment 5 for the survey) to be administered by the National Endowment for the Arts to applicants of its grants programs. This survey is intended to assess performance on one of the Agency's strategic objectives for FY2014-2018. The intended period of administration is the remainder of FY2015 through FY2018. In addition to assessing performance, the Survey is intended to provide customer feedback on grant application guidance provided by the Agency; this feedback will be used to improve customer service.

A. JUSTIFICATION

A.1. Circumstances: *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

In Executive Order (EO) 13571, issued on April 27, 2011, the President stated that, "with advances in technology and service delivery systems in other sectors, the public's expectations of the Government have continued to rise," and that the Government "must keep pace with and even exceed those expectations." In addition, the President made clear that the Government "must also address the need to improve its services." EO 13571 called for departments and agencies to "establish mechanisms to solicit customer feedback on government services and use such feedback regularly to make service improvements, such as [to] collect ongoing, timely, actionable customer feedback to identify early warning signals of customer service issues, and conduct customer satisfaction surveys and report the results publicly to provide transparency and accountability."

Through the Grant Application Guidance Survey, the NEA will continue to solicit and collect customer feedback on the guidance it provides to organizations, individuals, and government agencies that apply for grants. This feedback will be used regularly to identify customer service issues with the intent of improving Government service to its customers. Data collected from this survey will also be used to report on performance of one of the Agency's strategic objectives from its FY2014-2018 Strategic Plan (attached), ensuring that survey results will be reported publicly. As stated on pages 23-24 and 26 of the Strategic Plan, the Grant Applicant Guidance Survey was established to track success in achieving the Plan's Management Objective 1.2, "NEA is an efficient and vigilant steward of public funds by sustaining transparent and efficient grant-making and administrative practices." The stated intent of the Grant Application Guidance Survey, as presented in the Strategic Plan, is to assess applicants' "experiences in using and understanding the grant application guidelines on the NEA website as well as the quality of interactions with NEA staff while preparing applications."

A.2 Needs and Uses of Information: *Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

First and foremost, the information collected through the Grant Application Guidance Survey will be used by the NEA's Office of Management and Budget to provide data for reporting to OMB and Congress on Management Objective 1.2. Secondly, the customer feedback collected through this survey will be used by the Office of Grant Guidelines & Panel Operations to identify any areas of concern with existing grant application guidance and assess the efficacy of how this information is presented to the public. This office will work with the Office of the Senior Deputy Chairman and other Agency staff to identify overall trends and solutions to address any problems with the intent of improving and streamlining guidance for grant applicants. Analysis from Grant Application Guidance Survey data has already led to refined application instructions and improved delivery of technical assistance to the public. The Agency also will make Grant Application Guidance Survey data available to all staff in an effort to increase customer service.

A. 3. Use of Technology: *Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.*

This information collection will use an online survey administration and data collection service provided by a commercial vendor (SurveyMonkey). In addition to automating the data collection process, this service also aggregates and summarizes the data. The use of online survey administration reduces burden by allowing the NEA to collect and analyze data quickly and efficiently with minimal cost to the Government; and by providing the public with a means to completing the survey at a time and place of their choosing. Since grant applications are submitted online, the NEA knows that all grant applicants have the capability to complete an online survey. Therefore, the use of online survey administration and data collection is considered the most appropriate collection methodology.

A.4. Elimination of Duplication: *Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.*

Prior to the creation of this survey instrument, there was only one non-quantitative source of information about grant applicant response to the grant application process. Applicants were invited to provide feedback by email on the extent to which the NEA met its standards for serving applicants. Applicants did not send such feedback. Consequently, there was no Agency information collection providing detailed and frequent feedback on grant application guidance until the Agency began administering this survey.

A.5. Minimizing Burden in Small Businesses or Small Entities: *If the collection of*

information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection will involve some small entities. Steps have been taken to minimize burden. First, the time burden of the survey has been kept deliberately short while still collecting substantive information to provide customer feedback on grant application guidance. The low time burden was attained by minimizing the use of open-ended questions and keeping the overall number of questions small. Secondly, the ease of access provided by an online administration also reduces the burden on small entities. The online format provides small entities with the means to complete the survey at a time and place of their choosing. All questions are voluntary, which also reduces burden for any respondent who may not want to answer a particular question.

A. 6. Consequences of Less Frequent Data Collection: *Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

The intent of the NEA is to administer the survey to all grant applicants during the duration of its FY2014-FY2018 Strategic Plan. In order to accomplish this intent, the Agency will administer the survey following each grant application deadline (approximately twelve deadlines per year). If the survey was administered less frequently (e.g., annually), the customer feedback provided by grant applicants would be less timely for the Agency, thereby potentially allowing customer service issues to go unnoticed for up to a year. Secondly, it is most appropriate to collect feedback immediately after an applicant has completed and submitted a grant application while the memory of the experience is still fresh. To delay the administration would be to risk a lack of recall by survey respondents. There are no other known technical or legal obstacles to reducing burden beyond these factors.

A.7. Special Circumstances: *Explain any special circumstances that would cause an information collection to be conducted in a manner:*

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document;*
- *requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data*
- *security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted*

- *procedures to protect the information's confidentiality to the extent permitted by law.*

There are no special circumstances associated with this information collection.

A.8. Public Comment and Consultations Outside the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A notice was published in the Federal Register (pages 1971-1972) on January 14, 2015, to solicit comments on the Grant Application Guidance Survey prior to submission of this OMB clearance request. (A copy of this notice is in attachment 3). No public comments were received in response to this notice. The second Federal Register notice was published on April 10, 2015 (pages 19357-19358). (A copy of this notice is in attachment 4). The proposed data collection was also distributed to approximately 50 employees within the agency in February, 2015 for comment. Their feedback showed that the survey was perceived to be relevant, easy to understand, and not a burden.

A.9. Paying Respondents: *Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.*

The NEA will not make any payments nor provide any gifts to individuals participating in the Grant Application Guidance Survey.

A.10. Assurance of Confidentiality: *Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.*

The NEA will conduct this information collection in compliance with the Privacy Act of 1974 and the OMB Circular A-130. During each survey administration, each grant applicant will receive an email with the URL link to the survey. The email will include the information required by the Privacy Act of 1974, explain the voluntary nature of the survey, and state the estimated time required for participating in the survey. The email will provide assurance that the information will be collected anonymously. No email addresses, names, or other personally identifiable information will be collected.

A.11. Questions of a Sensitive Nature: *Provide additional justification for any questions of a*

sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The Grant Application Guidance Survey does not include any questions of a sensitive nature.

A.12. Estimate of Hour Burden

Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.*
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.*

The NEA anticipates the receipt of approximately 5,764 applications annually based on numbers of applications received in FY2014. Based on this estimate, the estimated respondent burden is 291 hours for each of fiscal years (FY) 2015 through 2018. This estimated burden is based on an average 3-minute completion time for each of the 5,764 persons aged 18 years and older in the grant applicant universe. This estimate was based on an average of three test administrations of the survey instrument on NEA staff. Given the low hour burden for this survey, the NEA does not anticipate an annualized cost to respondents.

A.13. Estimate of Cost Burden

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing*
- the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such*

as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

There are no costs to respondents other than that of their time to respond.

A.14. Cost to Federal Government: *Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.*

The estimated annual cost to the government of the Grant Application Guidance Survey is \$300, which will be borne by the NEA. This estimate is based on the annual subscription fee for SurveyMonkey. Since this online software service aggregates the data, no analytical costs are anticipated.

A.15 Reasons for Program Changes: *Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.*

There is no change in the estimated cost burden to the Federal Government. Based on FY2014 figures, our estimated number of applications has increased modestly from our last submission, from 5,714 to a current estimate of 5,764. Our projected annual time burden, therefore, reflects a corresponding increase of 5 hours from our last submission, from 286 hours to 291 hours. Given the low hour burden for this survey (3 minutes per response on average), the NEA does not anticipate an annualized cost to respondents.

A.16. Project Schedule: *For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

The first administration of the Grant Application Guidance Survey will take place in August 2015. Approximately twelve administrations of the Survey are anticipated annually based on

the current schedule of grant application deadlines. Each administration period will begin within two weeks following the grant application deadline and will be open for four days. An internal report will be produced within 30 days of the close of each administration period. Reporting on the performance measure will take place once during the year in September (Annual Budget Request to OMB). NEA will establish performance goals and report out survey results in relation to these targets.

For performance reporting, data collected on 7 of the 12 question items will be used (see Attachment 5). These seven questions (3.1, 5, 6.1, 6.2, 6.3, 7.1, 7.2) specifically collect feedback on the different forms of application guidance (webinar, website, staff) will be used to generate the data for the performance measure. Six of the seven question items use a 5-point Likert scale, ranging from Strongly Disagree to Strongly Agree; one question item provides a Yes/No option. Agree, Strongly Agree, and Yes responses to question items will be considered positive. Overall applicant satisfaction will be calculated as the average percentage of the combined positive responses for each of the seven questions divided by the total completed responses for each of those survey questions.

A. 17. Request to Not Display Expiration Date: *If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

The NEA is not requesting an exemption.

A. 18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable. There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

B.1. Universe and Respondent Selection

The NEA will administer the Grant Application Guidance Survey within two weeks following each grant application deadline for the remainder of FY2015 through FY2018. The universe is all direct grant applicants to the NEA across all its grant-making programs. Grant applicants include the following types of entities: nonprofit organizations, state governments, county governments, municipal governments, tribal governments. Individuals applying for direct grants also will be surveyed.

The listing of direct grant applicants will be drawn from the listing of primary contacts for all submitted grant applications. The survey will be administered to the entire universe, since the Agency wants to provide all applicants with the opportunity to provide feedback on its application guidance. The Agency estimates a total annual distribution of 5,764. Distributions per administration date will range from approximately 60-1,900 based upon the estimated number of applicants to each grant application deadline. Recorded response rates for individual Grant Applicant Guidance Surveys conducted in FY 2014 ranged from 30%-71%. The Agency expects to maintain response rates in this range.

B.2. Procedures for Collecting Information

Statistical methodology for stratification and sample selection. Since the survey will be administered to the entire universe, no information on statistical methodology for stratification and sample selection has been included.

Estimation procedure. Not applicable.

Degree of accuracy needed for the purpose described in the justification. Not applicable.

Unusual problems requiring specialized sampling procedures. Not applicable.

A collection schedule based on application deadlines is proposed in order to collect feedback on guidance provided within approximately two weeks of the submission of a grant application. Since the applicant pool for each application deadline is distinct, unique data collection administrations are required.

B.3. Response Rates

Methods to maximize response rates and to deal with issues of non-response. In order to maximize response rates, the NEA will take the following steps:

- Provide a cover email that introduces the purpose of the survey; how the survey results will be used; provides clear directions on how to access the survey; and assures participants of anonymity;
- Provide enough time to complete the survey—a four-day administration period is proposed;
- Send an email reminder during the survey period encouraging participants to complete the survey.

Accuracy and reliability of information collected must be shown to be adequate for intended uses.

For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

Since a sampling procedure will not be used, this question is not relevant to this information collection. Recorded response rates for individual Grant Applicant Guidance Surveys conducted in FY 2014 ranged from 30%-71%.

B.4. Tests of Procedures or Methods

Describe any tests of procedures or methods to be undertaken.

Given the nature of this survey instrument, no tests of methods or procedures were undertaken.

B.5. Personnel

Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Statistical Personnel Consulted:

Melissa Menzer, PhD
National Endowment for the Arts
Office of Research & Analysis
202-682-5548

Personnel/Agency Unit Responsible for Data Collection & Analysis:

Jillian Miller
Guidelines & Panel Operations
National Endowment for the Arts
202-682-5504

Attachments

1. Executive Order (EO) 13571
2. NEA FY2014-2018 Strategic Plan
3. Federal Register Notice, Vol. 80, No. 9, pp. 1971-1972
4. Federal Register Notice, Vol. 80, No. 69, pp. 19357-19358
5. Grant Application Guidance Survey