

**Supporting Statement for the Regional and State Arts Agency  
CARES Act Funding Survey, Part A**

Last updated: May 27, 2021

## Table of Contents

A1. Circumstances that make the collection of information necessary. ....	<b>Error! Bookmark not defined.</b>
A2. Purpose and use of the information.....	5
A3. Use of information technology and burden reduction. ....	7
A4. Efforts to identify duplication. ....	8
A5. Impacts on small businesses or other small entities.....	8
A6. Consequences of collecting the information less frequently. ....	8
A7. Special circumstances relating to the Guidelines of 5 CFR 1320.6.....	9
A8. Comments in response to the Federal Register Notice and efforts to consult outside Agency. .....	9
A9. Explain any decisions to provide any payment or gift to respondents.....	9
A10. Assurances of confidentiality provided to respondents. ....	9
A11. Justification for any questions of a sensitive nature. ....	10
A12. Estimates of the hour burden of the collection of information. ....	10
A13. Estimates of other total annual cost burden. ....	11
A14. Provide estimates of annualized costs to the Federal Government.....	11
A15. Explain the reasons for any program changes or adjustments reported on the burden worksheet. ....	12
A16. Plans for tabulation, and publication and project time schedule.....	12
A17. Displaying the OMB Approval Expiration Date.....	13
A18. Exceptions to the certification statement identified in Item 19. ....	13

## Table of Attachments

Attachment A: Communication Materials  
Attachment B: Web Survey Instrument  
Attachment C: Cognitive Testing Report

## **Abstract**

This request for regular clearance will enable the National Assembly of State Arts Agencies (NASAA), in partnership with the National Endowment for the Arts (“the Arts Endowment”), to implement a web survey that will be used to support reporting on the outcomes of the emergency relief funding provided by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to state-level subgrantees from the Arts Endowment. This package requests the Office of Management and Budget’s (OMB) regular clearance for one-time data collection.

As part of the stimulus package passed by Congress in April 2020, the CARES Act appropriated \$75 million to the Arts Endowment for emergency relief. Forty percent of these funds were directed to state arts agencies and regional arts organizations to be distributed for emergency grantmaking. Stemming from an effort to understand the benefits and outcomes of emergency relief funds going to the 56 states and jurisdictions, the Arts Endowment partnered with NASAA to survey regional arts organizations and state arts agencies to collect data on the how the subgrantees used CARES Act funding.

This survey will assess how CARES Act funding from the Arts Endowment supported the continuation or creation of jobs and supported investment in infrastructure for state and regional subgrantees. This will allow the Arts Endowment to report on the outcomes of the funds that were distributed to states, which would not be possible without a new data collection mechanism.

The survey will be delivered to 62 state arts agencies and regional arts organizations who received Arts Endowment CARES Act funding. It will capture how many job grantees were able to maintain or create and the dollar amount invested in facilities. It will also capture any other

data state arts agencies are gathering related to CARES Act funds. It will take approximately 4.5 hours per response with 15 questions and skip patterns built into the survey.

## **Part A. Justification**

### **A1. 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.**

The planned data collection is a new information collection request, and the data to be collected are not available elsewhere unless obtained through this information collection. A web-based survey of state arts agencies and regional arts organizations will be implemented once during summer 2021 and will gather data on the outputs and outcomes of grantmaking using CARES Act emergency relief funds distributed by the Arts Endowment. Knowledge gained through this information collection will enable the Arts Endowment to collect evidence on the effect of the CARES Act funding administered to mitigate the adverse economic impacts of the COVID-19 pandemic. The Arts Endowment is collecting final report data for direct grantees with questions pertaining to staff and infrastructure investment, however, the Arts Endowment does not regularly collect information on sub-grantee investments in employment or facilities associated with funding administered from CARES Act allocations to states and regions.

The National Endowment for the Arts is compelled by Congress to obligate 40 percent of its program budget to state arts agencies and regional arts organizations through Partnership Agreements (20 U.S.C. § 954(g)). In turn, state arts agencies use these funds to support state and regional grantmaking and other programming, “developing projects and productions in the arts in such a manner as will furnish adequate programs, facilities, and services in the arts to all the people and communities in each of the several States.” (20 U.S.C. § 954. (g)(1)). For regular

Partnership Agreements, states are required to report subgrantee data to the National Endowment for the Arts (OMB Control Number 3135-0140).

As part of the stimulus package passed by Congress in April 2020, the CARES Act appropriated \$75 million to the Arts Endowment for emergency relief. Forty percent of these funds were directed to state arts agencies and regional arts organizations to be distributed for emergency grantmaking. After the National Assembly of State Arts Agencies (NASAA) conducted a listening session on June 24, 2020 with executive directors of state arts agencies, based on OMB guidance to federal agencies in administering and implementing relief funding, the administration emphasized minimal burden to expedite implementing funding decisions, which gave agencies leeway in determining appropriate transparency and accountability mechanisms.

With this guidance, the National Endowment for the Arts determined that there would be no additional reporting requirements for states and regions associated with these emergency funds in order to minimize burdens of during the pandemic. CARES funds were administered to state arts agencies and regional arts organizations via amendments to their already existing FY 2019 partnership agreements (Award ID Number 1882738-61-C-20), which are reported to the Arts Endowment annually in Final Descriptive Reports (OMB Control Number 3135-0140).

However, the Arts Endowment's Final Descriptive Reports for state arts agencies and regional arts organizations do not request data describing the jobs and facility or infrastructure investments, which were the primary purpose of CARES Act dollars to state arts agencies and regional arts organizations. In an effort to understand the benefits and outcomes of emergency relief funds going to the 62 state arts agencies and regional arts organizations, the Arts

Endowment partnered with NASAA to survey state arts agencies and regional arts organizations to collect data on the how subgrantees used CARES Act funding.

## **A2. Purpose and use of the information.**

**Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.**

NASAA, in partnership with the Arts Endowment, will issue one survey to 62 states, jurisdictions and regions to estimate how subgrantees have benefited from the CARES Act funding administered by the Arts Endowment and how each state or jurisdiction benefited overall from receiving CARES Act dollars. The survey will be administered via an online platform to executive directors or deputy directors of 62 state arts agencies and regional arts organizations. The Arts Endowment will use the information collected in the survey to report on how emergency relief has served communities across the U.S. The survey will ask the following information from each state arts agency and regional arts organization:

- Detail how the state or region administered Arts Endowment CARES Act funding.
- Estimate how many jobs subgrantees were able to maintain or create due to Arts Endowment CARES Act dollars.
- Estimate the total dollar amount subgrantees invested in facilities and infrastructure and the number of organizations receiving facilities and infrastructure grants due to Arts Endowment CARES Act dollars.
- Provide an opportunity to share any additional qualitative or quantitative subgrantee data related to Arts Endowment CARES Act funding that state arts agencies and regional arts organizations have collected.

- Select specific benefits the Arts Endowment CARES Act funding has had in the state or region.

NASAA will collect and analyze all survey data and prepare a report of findings. NASAA will report data for individual states, regions, and jurisdictions to the Arts Endowment and will conduct an analysis to determine what can be reported or extrapolated in the aggregate based on available data.

The Arts Endowment will include aggregated subgrantee data as part of overall CARES Act public reporting. The primary indicators will be the number of jobs created or maintained by grantees and subgrantees (full time and part time), and the facilities/infrastructure supported with CARES Act dollars.

To determine the appropriate mechanism for collecting data on the effects of CARES Act funding going to state arts agencies, NASAA gathered data from a few sources. First, NASAA convened a listening session on June 24, 2020, with 9 executive directors of state arts agencies and regional arts organizations to discuss the burden of reporting requirements associated with CARES Act funding. Based on the listening session, the Arts Endowment determined there would be no reporting requirements to mitigate additional burden. Instead there was potential for a survey of subgrantees, or a survey of state arts agencies and regional arts organizations based on data they collected from subgrantees, to capture jobs and facility costs. To that end, in December 2020 and January 2021, NASAA gathered information (from a conversation with grants officers and individual states' reviewing reporting requirements) on what data state arts agencies have collected from subgrantees. NASAA also had a conversation with grants officers to ascertain the same information. Based on all of the information gathered, it was determined

that the least amount of burden would be to survey state art agencies and regional arts organizations to collect estimates of CARES Act funds on subgrantees.

### **A3. Use of information technology and burden reduction.**

**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.**

NASAA and the Arts Endowment take their responsibility to minimize burden on respondents very seriously and has designed this project with that goal in mind. By designing a web-based survey, NASAA has eliminated hundreds of hours of labor that would have been required to administer a paper-based survey. A web-based survey enables the surveying of all state arts agencies at no additional cost. Thus, the electronic nature of the survey provides the most efficient mechanism for NASAA to capture responses from these state agencies and regional organizations.

Once the survey is electronically deployed, it will include dynamic survey logic that will tailor the questions to present the most applicable and relevant questions to respondents. For example, those who respond no to a question asking if they have data on subgrantee job creation, they will not be shown any follow up questions related to how many jobs subgrantees created.

### **A4. Efforts to identify 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.**

There is no similar ongoing data collection being conducted that duplicates the efforts of the proposed data collection. This web survey is the first and only federal and aggregated survey



on Arts Endowment CARES Act outcomes at the subgrantee level. As a result, the Arts Endowment lacks information about outcome of CARES Act funding at the subgrantee level.

**A5. Impacts on small businesses or other small entities.**

No small business entities or other small entities are involved in this data collection. By opting to survey 56 state arts agencies, which are state government entities, and 6 regional arts organizations, instead of subgrantees, this has eliminated burden or impacts on hundreds of small entities.

**A6. Consequences of collecting the information less frequently.**

**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 the burden.**

Without this survey, the Arts Endowment would have no method for capturing the specifically identified outcomes of importance from the 40% of the Arts Endowment CARES Act funding that were allocated to state arts agencies and regional arts organizations. With the direction from OMB that no new reporting requirements should be associated with CARES Act funding, state arts agencies will track subgrant recipients and dollar amounts associated with each subgrantee. State arts agencies and regional arts organizations will report total funding amounts within their regular, annual Final Descriptive Reports to the Art Endowment. However, these standard data requirements do not require specific disaggregated data for individual CARES Act dollars. SAAs and RAOs administered CARES Act dollars through a variety of mechanisms including current grantee amendments and new grant programs. Additionally, these standard reporting requirements do not contain data on the primary purposes of CARES Act funding as administered via the Arts Endowment: to retain jobs and operation of facilities during

the COVID-19 crises. Without these data, the Arts Endowment will not have sufficient data to understand the outcomes of emergency relief policies. Due to the unprecedented financial impact of the COVID-19 pandemic, and the subsequent stimulus, this was an unforeseen supplemental funding stream and will not be a regularly occurring funding stream in the future.

**A7. Special circumstances relating to the Guidelines of 5 CFR 1320.6.**

The information will be collected in a manner consistent with the guidelines in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public-General Information Collection Guidelines). There are no special circumstances contrary to these guidelines.

**A8. Comments in response to the Federal Register Notice and efforts to consult outside Agency.**

On Tuesday February 16, 2021, a 60-day Federal Register Notice was published in 86 FR 9543 Volume 86, No. 29. One comment was received. Cognitive testing of the web survey was conducted in March 2021, with eight state respondents, and feedback from one regional arts organization in May 2021. See Attachment C. On June 8, 2021 a 30-day Federal Register Notice was published in 86 FR 30499 Volume 86, No. 108.

**A9. Explain any decisions to provide any payment or gift to respondents**

Respondents will not receive any payment or gifts for completion of the web survey.

**A10. Assurances of confidentiality provided to respondents.**

The survey introduction and email communications include a statement to respondents that all data for the survey will be kept confidential and that data will only be analyzed and reported to the public in aggregate. NASAA will provide all respondents with a description of the

importance of the survey and a notification that their response to the survey is voluntary. The Arts Endowment will include aggregated subgrantee data as part of overall CARES Act reporting.

**A11. Justification for any 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.**

The survey does not contain any questions of a sensitive nature.

**A12. Estimates of the hour burden of the collection of information.**

**Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

<b>Participant Description</b>	<b>Instrument or Activity</b>	<b>Average Hours per Response</b>	<b>Number of Responses per Person</b>	<b>Total Responses</b>	<b>Estimated Burden (Hours)</b>
State arts agencies and regional arts organizations, July 2021	Web Survey	4.5	1	62	279

The total estimated burden for web surveys to be conducted in summer 2021 is 16,740 minutes, or 279 hours, based on the estimate of 4.5 hours per respondent, as supported by the findings from the cognitive testing of the survey instrument. Participants reported the survey took 29.4 minutes, on average, to complete, with a range of 5 to 90 minutes. Those who reported longer times said they needed to consult with colleagues and/or extract data. Those who reported shorter times acknowledged that it would take longer to complete the survey when they had all of their data to report. All participants reported that additional time will be needed to extract information from spreadsheets, applications, and/or final reports. Time estimates for extracting

and compiling this data ranged from 2 to 35 hours. The higher end of the time estimation was due to some respondents having to extract quantitative data from individual qualitative reports. Instead of placing burden on the respondent to extract these data, the survey includes a function to upload raw data respondents may have.

**A13. Estimates of other total annual cost burden.**

**Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

Web survey participants do not incur any costs other than their time spent responding.

**A14. Provide estimates of annualized costs to the Federal Government.**

The total one-time contracted cost to the Federal Government for:

Total one-time costs for NASAA staff hours and all other outside professional services: \$45,000

**A15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.**

The survey is a new data collection.

**A16. Plans for tabulation, and publication and project time 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 purpose of this clearance package is to obtain full clearance for the Arts Endowment and NASAA to conduct data collection from state arts agencies. NASAA conducted preliminary conversations with state arts agency grants officers and review of reporting materials in December 2020 and January 2021. After obtaining final clearance, NASAA will conduct one survey in July 2021, pending OMB approval, with a report to be delivered to the Arts Endowment in September 2021. A descriptive statistical analysis will be used to examine aggregate survey data. A final report will estimate the total the number of jobs created or

continued and the amount granted for infrastructure. NASAA will also clean and evaluate additional data uploaded by respondents and will assess benefits of Arts Endowment CARES Act funding to states and regions, describing variation in response through cross tabulations.

**A17. Displaying the OMB Approval Expiration Date.**

**If you are seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

NASAA and the Arts Endowment will display the expiration date of OMB approval and the OMB approval number on all instruments associated with this information collection, including forms and questionnaires.

**A18. Exceptions to the certification statement identified in Item 19.**

**Explain each exception to the topics of the certification statement identified in Certification for Paperwork Reduction Act Submissions.**

No exceptions are necessary for this information collection.