

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

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## **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 (NEA), to implement an online survey that will be used to support reporting on the outcomes of relief funding provided by the American Rescue Plan (ARP) to state-level subgrantees from the NEA. 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 March 2021, the ARP appropriated \$135 million to the NEA for emergency relief. Forty percent of these funds were directed to state arts agencies and regional arts organizations to be distributed for grantmaking. Stemming from an effort to understand the benefits and outcomes of relief funds going to states and jurisdictions, the NEA will partner with NASAA to survey regional arts organizations and state arts agencies to collect data on the how the subgrantees used NEA ARP funding.

The ARP funding survey is modeled after the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) funding survey approved by OMB under the same OMB Control Number (see ICR Ref. No. 202105-3135-001) and administered by the NEA in partnership with NASAA in 2020. The intent of both surveys is to assess how federal Covid-19 relief funding from the NEA supported the continuation or creation of jobs and supported investment in infrastructure for state and regional subgrantees. It captures how many jobs grantees were able to maintain or create and the dollar amount invested in facilities. Additionally, it collects any other data state arts agencies are gathering related to ARP funds. The administration of the survey will allow the NEA to again report on the outcomes of the relief funds that were distributed to states. The two surveys are identical

with the exception that programmatic information regarding relief dollars, like grant program name and description, is updated in the ARP funding survey.

The online survey will be delivered to 62 state arts agencies and regional arts organizations who received NEA ARP funding. 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 NEA 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)). Like CARES Act funds, ARP funds were administered to state arts agencies and regional arts organizations via amendments to their already existing fiscal year 2021 partnership agreements, which are reported to the NEA annually in Final Descriptive Reports (OMB Control Number 3135-0140).

However, the NEA’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 ARP dollars to state arts agencies and regional arts organizations. The planned data collection is a new information request as

the subgrantee data are not available elsewhere unless obtained through this information collection.

For CARES Act funding, NASAA gathered data to determine the appropriate mechanism for collecting data on the effects of CARES Act funding going to state arts agencies. 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 NEA 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. 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. Based on this information, the NEA seeks to again reduce burden on subgrantees when collecting information about ARP funds by administering a survey.

Aligned with this previous work on CARES Act funding, a survey will once again be employed to gather information about the impact of NEA Covid-19 relief funding that is not available otherwise. The online ARP funding survey of state arts agencies and regional arts organizations will be implemented once in winter 2023 and will gather data on the outputs and outcomes of grantmaking using ARP funds distributed by the NEA.

Knowledge gained through this information collection will enable the NEA to collect evidence on the effect of ARP funding administered to mitigate the adverse economic impacts of the COVID-19 pandemic.

## **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 NEA, will issue one survey to each of the 62 states, jurisdictions and regions to estimate how grantees and subgrantees benefited from the ARP funding administered by the NEA. 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 NEA 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 NEA ARP funding.
- Estimate how many jobs subgrantees were able to maintain or create due to NEA ARP dollars.
- Estimate the total dollar amount subgrantees invested in facilities and infrastructure and the number of organizations receiving facilities and infrastructure grants due to NEA ARP dollars.
- Provide an opportunity to share any additional qualitative or quantitative subgrantee data related to NEA ARP funding that state arts agencies and regional arts organizations have collected.
- Select specific benefits the NEA ARP funding has had in the state or region.

NASAA will report data for individual states, regions, and jurisdictions to the NEA

and will conduct an analysis to determine what can be reported or extrapolated in the aggregate based on available data. The research project will culminate with a report of findings prepared by NASAA.

The NEA will include aggregated subgrantee data as part of overall ARP 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 infrastructure supported with ARP dollars.

### **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 NEA take their responsibility to minimize burden on respondents very seriously and has designed this project with that goal in mind. By designing an online survey, NASAA eliminated hundreds of hours of labor that would have been required to administer a paper-based survey. An online 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. The online survey is the first and only federal and aggregated survey on NEA ARP funding outcomes at the subgrantee level. As a result, the NEA lacks information about outcome of ARP 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 NEA would have no method for capturing the specifically identified outcomes of importance from the 40 percent of the NEA ARP funding that were allocated to state arts agencies and regional arts organizations.

Like CARES Act funding, state arts agencies will track subgrant recipients and dollar amounts associated with each subgrantee for ARP funding based on direction from OMB that no new reporting requirements should be associated with relief funding. State arts agencies and regional arts organizations will report total funding amounts within their regular, annual Final Descriptive Reports to the NEA. However, these



standard data requirements do not require specific disaggregated data for individual ARP dollars. SAAs and RAOs administered ARP 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 ARP funding as administered via the NEA: to retain jobs and operation of facilities during the COVID-19 crises. Without these data, the NEA will not have sufficient information to understand the outcomes of ARP 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 June 17, 2022, a 60-day Federal Register Notice was published in 87 FR 36546 Volume 87, No. 117. One comment was received. Cognitive testing of the web survey developed for the CARES Act Funding Survey, which the Regional and State ARP Funding Survey is based on, was conducted in March 2021, with eight state respondents, and feedback from one regional arts organization in May 2021. See Attachment C. On August 22, 2022 a 30-day Federal Register Notice was published in Volume 87 FR 51453 Volume 87, No. 161.

**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 NEA will include aggregated subgrantee data as part of overall ARP 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	Web Survey	4.5	1	62	279

The total estimated burden for online surveys to be conducted in winter 2023 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 CARES Act funding survey

instrument, which the Regional and State ARP Funding Survey is based on. 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 allows for them to upload raw data, if convenient.

**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.**

The estimated total annual cost burden is \$9,575.28. This is based on the above figure of 4.5 hours of respondent burden multiplied by \$34.32, which is the average hourly wages and salaries of state and local government employees<sup>1</sup>.

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

The total one-time contracted cost to the Federal Government is \$25,000 for NASAA staff hours and all other outside professional services.

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

The survey is a new data collection.

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<sup>1</sup> U.S. Bureau of Labor Statistics (2022), Employer Costs for Employee Compensation - March 2022. <https://www.bls.gov/news.release/pdf/ecec.pdf>.

**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 NEA and NASAA to conduct data collection from state arts agencies and regional arts organizations. NASAA conducted preliminary conversations with state arts agency grants officers and review of Covid-19 relief funding reporting materials in December 2020 and January 2021 during the development phase for the CARES Act Funding Survey, which the Regional and State ARP Funding Survey is based on. After obtaining final clearance for the Regional and State ARP Funding Survey, NASAA will conduct one survey in winter 2023, pending OMB approval, with a report to be delivered to the NEA in March 2023. A descriptive statistical analysis will be used to examine aggregate survey data. A final report will estimate the total number of jobs created or retained and the amount granted for infrastructure. NASAA will also clean and evaluate additional raw data uploaded by respondents and will assess benefits of NEA ARP 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 NEA 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.