

## **National Endowment for the Arts Supporting Statement Blanket Justification for NEA Funding Application Guidelines and Requirements**

### **A. Justification**

- 1. 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.**

The Chair of the National Endowment for the Arts (“NEA”) is authorized to carry out a program of grants-in-aid by the agency’s enabling legislation (20 U.S.C. §954). With the recommendations of advisory panelists and members of the National Council on the Arts, the NEA Chair establishes eligibility requirements and criteria for the review of applications. Applications for funding are accepted at different deadlines throughout the year for a variety of arts projects from nonprofit organizations, government agencies, and individuals.

The NEA has limited federal funds and cannot fund all of the eligible requests that it receives. Competitive review of applications for financial assistance is performed by advisory panelists and the National Council on the Arts (currently composed of 18 Presidentially-appointed members and three members of Congress who serve ex officio). The Council sends forward to the NEA Chair those applications that it recommends for funding. The NEA Chair reviews the Council’s recommendations and makes the final decision on all awards. The information that is collected on the application form and accompanying supplemental materials is used in the review process. This information is necessary for the accurate, fair, and thorough consideration of competing funding proposals.

- 2. 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.**

NEA staff post to an online application review system the completed application forms and other information submitted by grant applicants so that advisory panelists may review these materials. Each advisory panel comprises a diverse group of arts experts and other individuals including at least one knowledgeable layperson. Panel membership rotates regularly.

The application guidelines ensure that all applicants submit comparable information. Without the specific instructions provided by the guidelines, applications would vary in length, format, and consistency and the job of reviewing them would be untenable. If this information was not collected (or not collected in a standardized manner), advisory panelists, the National Council on the Arts, and the NEA’s Chair would not have the basis on which to make sound evaluations and

recommendations. Arbitrary or random methods would be required to select applications for funding.

Information that is collected on the application forms also is used for breakdowns of our applications—for example, by arts discipline, by project type, by type of organization, etc.—and for assessing the agency’s performance in carrying out its strategic goals and objectives.

3. **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.**

The NEA makes all of its application guidelines available on its website and places application packages for all of its funding categories on Grants.gov. The guidelines provide direct links to the application packages on Grants.gov for easy maneuverability. All applicants are required to submit their applications electronically through Grants.gov and the NEA’s online Applicant Portal (for certain funding categories only). Waivers are extremely limited, available only to those who do not have internet access available within 30 miles of their address or in cases where disability prevents the submission of an electronic application.

The NEA has greatly refined its electronic application systems in response to government-wide initiatives and to the agency’s desire to improve efficiency and the reliability and usefulness of the information collected. Most applicants submit a majority of their applications via consolidated webforms located on the agency’s Applicant Portal whenever possible. This has created efficiencies for staff by electronically validating what is submitted, as well as providing easy access to information in data fields for dissemination, decision-making, and research purposes. Applicants have benefited from these efficiencies as well. Instead of submitting multiple application forms as PDF attachments, they enter information into one webform. We continually explore ways to refine our information technology systems for the benefit of applicants, panelists, and staff.

4. **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.**

The NEA uses Grants.gov’s standard Application for Federal Domestic Assistance forms for all of its electronic applications: SF-424 Mandatory for government agencies; SF-424-Short for nonprofit organizations; and the SF- 424-Individual for individuals.

We have three basic sets of forms, one for each of our major constituency types: government agencies (notably the state arts agencies), nonprofit organizations, and individuals. The NEA has carefully analyzed its own additional forms to make certain that there is no duplication with the information requested by the Grants.gov forms. We also have examined our own family of forms to see where consolidation and uniformity was possible.

The Grants.gov and the NEA forms, together with other required supplementary material, request the information that the agency needs to assess consistently applications for financial assistance. Each year, most applicants apply for a single, specific project. This project changes from year to year, as do the personnel involved, timelines, and the project budget. Much of the information collected one year is not relevant to the next year's request since it is not current.

In the case of government agencies, the NEA has a continuing relationship with the state arts agencies and their regional arts organizations and reviews plans from these agencies that cover aspects of their programming. Full proposals normally are reviewed only once every three years; only abbreviated updates are requested in the "off" years.

Each set of application guidelines is reviewed regularly by a wide variety of representatives from the field. Many of the individuals involved have been responsible for completing applications in the past. Others, as panel members, have taken part in the application review process. These individuals are well qualified to help assure that only essential information is requested and that it is as non-duplicative as possible.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Some of the NEA's funding opportunities are aimed specifically at sections of the country, areas of cities, and rural areas that are not fully participating in the arts experiences that are available in our nation. Particularly with these initiatives, special attention has been given to minimizing the burden on applicants. In addition, all of our application materials are developed with sensitivity to the constraints faced by small, independently-run, non-profit organizations.

**6. 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 collection of information correlates directly with specific application deadlines that are listed in the guidelines. Most applicants are limited to submitting a single application, for a specific project, each year. The project for which they apply changes from year to year.

Panelists review applications on their merits and in competition with other applications in the same category. A grant awarded one year does not imply NEA support in subsequent years. If the requested information was collected less frequently, panelists would not have timely or accurate information on which to base their evaluations. The NEA would be unable to ensure the fair and accountable use of federal funds and would not be able to carry out its legislative mandate.

7. **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.**

The agency intends to collect the vast majority of its information from applicants in a manner that does not necessitate any of the special requirements noted above. However, there are limited instances where the NEA Chair, as provided for in our legislation, may want to respond quickly to a specific need or opportunity in the field, particularly when this can help the NEA fulfill its goal of providing grants in areas that are underserved. In such cases, an applicant may be asked to respond to a collection of information in fewer than 30 days. A short turn-around time at the application stage would be part of an expedited review and processing cycle designed to benefit the respondent.

8. **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, Vol. 87, No. 123 (document 2022-13768) on June 28, 2022, to solicit comments on the "Blanket Justification for National Endowment for the Arts Funding Application Guidelines and Requirements" prior to submission of this OMB clearance request. One public comment was received at the NEA in response to this notice.

Advisory panelists (approximately 700 individuals per year) who review applications are regularly consulted as to the clarity of the application guidelines and the value of the information that is requested. In addition, the National Council on the Arts devotes a portion of its meeting time to a discussion of the application guidelines.

In addition, NEA staff members consult regularly with individuals in their fields nationwide. Service organizations and state arts agencies often provide suggestions on the application guidelines from their constituents. The staff also receive and consider suggestions for revising the application guidelines from applicants through an anonymous survey administered to a random sampling of applicants after each of the agency's principal grant deadlines.

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

Not applicable. The NEA does not provide any payments or gifts to respondents.

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

Assurance of confidentiality is provided for under the terms of the Privacy Act of 1974.

The NEA is authorized to solicit applicant information by the agency's enabling legislation [20 U.S.C. §954].

11. **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.**

No questions of a sensitive nature are included in the information collection.

12. **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.**
- **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 14.**

### **ESTIMATED RESPONDENT BURDEN (IN HOURS) FOR APPLICATIONS**

The chart below is broken out by the three basic types of recipients, which correspond to the three basic sets of forms/supplementary material that the NEA requests of its applicants. Figures are based on a frequency of one response per year for applications and requirements.

<b>Type of Recipient</b>	<b>Est. # of Apps</b>	<b>Average Time per App</b>	<b>Est. Reporting Burden for Applications (Hours)</b>
Nonprofit Orgs	4,750	23	109,250
Gov Agencies	63*	14	882
Individuals	1,900	11	20,900
<b>TOTALS</b>	<b>6,713</b>		<b>131,032</b>

\*Includes both full and off-year requests.

The total annual burden (in hours) of the application guidelines is estimated at 131,032 hours. This burden is calculated by multiplying the estimated number of applications for each type of applicant x the estimated average hourly response burden for that type x 1 response per year. The category totals are added together for an agency-wide estimate of 131,032 hours. With an agency-wide estimate of 6,713 applications, this works out to an agency average of 20 hours per response.

This average hours-per-response differs significantly by applicant type: from 23 hours for nonprofit organizations to 11 hours for individuals. The average for government agencies is 14 hours, but this figure includes both the state arts agencies and regional organizations that are submitting full proposals (due every three years and estimated at 32 hours per proposal) and those other more numerous agencies that are submitting only off-year updates (estimated at 8 hours per response).

There is also some variation within the nonprofit organizations group. The estimated application burden for most of these applicants is 26 hours. However, certain categories of funding are designed specifically to increase access in underserved areas and have simplified application requirements; the time burden for these categories is estimated at 11 hours.

### **ESTIMATED RESPONDENT BURDEN (COST) FOR APPLICATIONS**

<b>Type of Recipient</b>	<b>Est. # of Apps</b>	<b>Average # of Hours per Application</b>	<b>Total Hours</b>	<b>Average Hourly Wage</b>	<b>Total</b>
Nonprofit Orgs	4,750	23	109,250	\$26	\$2,840,500
Gov Agencies	63*	14	882	\$28.35	\$25,005
Individuals	1,900	11	20,900	\$38	\$794,200
<b>TOTALS</b>	<b>6,713</b>				<b>\$3,659,705</b>

The total annual cost burden to applicants (in dollars) is \$3,659,705. The figures above were estimated as follows. NEA staff were consulted as to the division of respondent time between professional staff and support staff for each type of recipient. The average hourly wage was computed factoring in professional and support staff wages proportionate to the amount of time each typically spends preparing applications. Salaries for personnel at nonprofit organizations and government agencies were estimated based on 1) salaries provided in this submission three years ago adjusted for Cost of Living Adjustments for the past three years; 2) a sampling of salaries presented in current applications; and 3) consultation with NEA staff. Salaries for individuals were estimated based on 1)

2020-2021 average salaries for assistant professors and instructors at U.S. colleges and universities; and 2) consultation with NEA staff.

- 13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet.)**
- **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 collection 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.**

Not applicable. There are no annual costs to respondents or recordkeepers resulting from this collection of information.

- 14. Provide estimates of annualized cost 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, 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.**

## **ESTIMATED FEDERAL GOVERNMENT BURDEN FOR APPLICATIONS**



Type of Review	Est. #	Average # of Hours per Application	Total Hours	Average Hourly Wage	Total
Applications	6,713	6	40,278	\$67	\$2,698,626
<b>TOTAL</b>					<b>\$2,698,626</b>

The total estimated annual cost to the Federal Government is \$2,698,626. In the chart above, the estimated number of hours for staff review of applications is based on staff experience with these tasks over a number of years. The Average Hourly Wage was developed in consultation with agency staff, based on the following. The review of applications averages 6 hours each. Each 6 hour review involves: 4 hours for the Program Specialist (average wage at the GS 12/5 level); 1 hour for Support Staff (average wage GS 9/1); and 1 hour for the Program Director (average wage GS 15/6). We computed the pay of these 3 positions (using the U.S. Office of Personnel Management's 2022 Salary Tables for the D.C. area) proportionately to the time spent by each, to come up with an average hourly rate of \$67. This figure includes an estimated 30.9% fringe benefits rate.

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

With respect to the application guidelines and requirements, the federal government's burden for these costs has increased since 2019 from \$2,443,014 to \$2,698,626 due to Cost of Living Adjustments over the past three years, as well as an increase in the number of applications to be processed. Similarly, the cost to respondents for the same period of time has increased from \$3,496,585 to \$3,659,705 due the same factors.

To mitigate the overall impact of these changes, we have carefully examined all of our grant funding opportunities to see where streamlining and consolidation might be desirable. Our efforts led us to simplify the application instructions and requirements, improve the presentation of application materials on our website, and refine our application webforms. As a result of these efforts, the application instructions and requirements included in this information clearance request will not see even a modest increase in annual applicant burden (in hours) from three years ago. In fact, the application guidelines and requirements for nonprofit organizations (approximately 4,750 applications per year) will see respondents' average time spent per application reduced by one hour—resulting in an estimated overall annual decrease of 3,250 hours from three years ago.

A summary of changes to the NEA's application guidelines and requirements is included at the bottom of this document (see "2022 PRA Summary of Changes" below).

16. **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.**

Not applicable.

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

Displaying the expiration date for OMB approval of the information collection is appropriate. The expiration date will be displayed on all application guidelines (including each form).

18. **Explain each exception to the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”**

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

## B. Collections of Information Employing Statistical Methods

Not applicable. This collection of information does not employ statistical methods.

### 2022 PRA Summary of Changes to Application Guidelines and Requirements:

Area	Detail
<b>All Non-Profit Grant Categories</b>	
Org and Project Profile Tab Data	Updates to list of choices in various categories.
Org and Project Profile Tab Data - Organizational leadership/staffing question	New question regarding organizational staff and governance. (Optional and not to be used in grant making decisions or panel review.)
NEPA/NHPA Question Form - 3c Public Art	New bullet asking for details about temporary art installations
Accessibility Question Form and Instructions	Updates to bullet points outlining types of accommodations
<b>FY24 Challenge America</b>	
Organizational budget	Simplified - applicants will now be asked to provide income and expenses for 3 years, but will no longer be asked to provide detailed breakdowns for each year.

Project Title	Renamed "Project Synopsis"
Project Summary	Removed from the application
Organizational Partners	New drop down list for applicants to identify project partner types
<b>Research Awards</b>	
GAF questions	Changes to: Mission and Background/History, Org Budget, Project Summary, Organizational Partners, Project Budget Instructions, Engagement with Intended Community, Participants & Audience.
<b>Our Town Grant Application Form (GAF) Instructions</b>	
Instructions Text	Changes to: Organizational Background, Org Budget, and Project Partners. Added short-term and long-term systems change questions
<b>FY24 Grants for Arts Projects (GAP) Application Instructions (GAF)</b>	
Discipline-specific sections (Additional Items, Items to Upload)	For the purposes of PRA review, we have moved the discipline specific sections to their own standalone document.
All Disciplines - Year Founded	New item
All Disciplines - Organizational Context for Project Activities	Revamped item, used to be Organizational Background
All Disciplines - Organizational budget	Simplified - applicants will now be asked to provide income and expenses for 3 years, but will no longer be asked to provide detailed breakdowns for each year.
All Disciplines - Arts Programmatic History	Refreshed language, guidance to provide 1-3 examples
All Disciplines - Project Title	Renamed "Project Synopsis"
All Disciplines - Project Summary	Removed from the application
All Disciplines - Project Description	Refreshed language
All Disciplines - Key Individuals/Orgs	Removal of summary questions
All Disciplines - Key Individuals/Orgs	Removal of pop-up window, applicants will now have a set of fields/drop downs for each individual or organization they enter.
All Disciplines - Organizational Partners	New drop down list for applicants to identify project partner types
All Disciplines - Engagement with Intended Community, Participants & Audience	Refreshed language; Addition of "race" to "ethnicity"
All Disciplines - Other Project Information	New question
GAP Design Instructions - Work Samples	Reduced time to 10 minutes

GAP Design Instructions - Additional Items	Removed additional items
GAP Musical Theater Instructions - Additional Items	Removed Artist Statement
GAP PMW Instructions - Additional Items	Removed Leadership Statement
GAP PMW Instructions - Work Samples	Revised max images, max pages of documents.
GAP Theater Instructions - Additional Items	Remove Artist Statement
<b>Government Agencies</b>	
State Arts Agency (SAA) Partnership Application Instructions	Streamlined On and Off year instructions; changes to Plan Implementation and Accomplishments; Program Budget Allocations, NEA Related program areas, Poetry out Loud.
Regional Arts Organizations (RAOs) Partnership Application Instructions	Streamlined On and Off year instructions; changes to Plan Implementation and Accomplishments; Program Budget Allocations, NEA Related program areas.
National Services Partnership Application Instructions	Streamlined On and Off year instructions, changes to Plan Implementation and Accomplishments, Resource Development and Management.
<b>Individuals</b>	
Heritage Fellows Acceptance Form Biographical info	Added "Tribal Affiliation" (Optional, and if applicable)