Supporting Statement for the HBCU Research	ch Study, Part A
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Table of Contents

A1. (Circumstances that make the collection of information necessary	3
A2. F	Purpose and use of the information	4
A3.	Use of information technology and burden reduction.	8
A4.	Efforts to identify duplication.	8
A5.	Impacts on small businesses or other small entities.	9
A6.	Consequences of collecting the information less frequently.	9
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	
Agen	ıcy	9
A9.	Explain any decisions to provide any payment or gift to respondents	10
A10.	Assurances of confidentiality provided to respondents.	10
A11.	Justification for any questions of a sensitive nature.	11
A12.	Estimates of the hour burden of the collection of information.	12
A13.	Estimates of other total annual cost burden.	14
A14.	Provide estimates of annualized costs to the Federal Government	14
A15.	Explain the reasons for any program changes or adjustments reported on the burden	
work	sheet.	15
A16.	Plans for tabulation, and publication and project time schedule	15
A17.	Displaying the OMB Approval Expiration Date	16
A18.	Exceptions to the certification statement identified in Item 19.	16

Table of Attachments

Attachment A: Communication Materials Attachment B: Web Survey Instrument
Attachment C: Cognitive Testing Report
Attachment D: Focus Group Discussion Guide
Attachment E: IRB Notice of Review and Exemption

Attachment F: Public comment

Part A. Justification

Executive Summary

This is a new Information Collection Request, requesting 2 years of approval.

This is a request for clearance for the National Endowment for the Arts (NEA) to conduct a web survey of the 103 currently operating historically black colleges and universities (HBCUs) and up to 21 virtual focus groups across three HBCUs selected for case studies (seven focus groups per case study). The data collected in the study are not intended to be generalized to a broader population.

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.

This is a request for clearance for the National Endowment for the Arts (NEA) to conduct a web survey of historically black colleges and universities (HBCUs) and focus groups across three HBCUs selected for case studies. 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. Both data collections will be conducted once as part of a mixed methods study on how HBCUs currently support the arts and arts education as preparatory to careers in the arts and in transdisciplinary fields.

In 2021, the HBCU Interagency Working Group (IWG) published agency competitiveness plans in a Federal HBCU Competitiveness Strategy, based on a Federal HBCU

3

¹ Available at https://sites.ed.gov/whhbcu/files/2021/01/Federal-HBCU-Competitiveness-Strategy.pdf.

Competitiveness Framework,² thus creating a government-wide plan to improve conditions under which HBCUs compete for federal opportunities.

The NEA's HBCU Competitiveness Plan provides a vision for the NEA's work with HBCUs. Outreach to HBCUs is a distinct priority of the NEA. The agency's vision is that, over time, every HBCU successfully will apply for funding opportunities through the NEA. To facilitate HBCU engagement with federal and state grant opportunities in the arts, it is desirable to understand, within these institutions, the nature and extent of arts and cultural assets (i.e., programs and facilities)—including arts and arts education (curricular and extra-curricular)—and of partnerships with national, state, and local arts organizations and funders. It is also desirable to know about the role of HBCUs' arts and cultural assets within the context of colleges and universities serving as anchor institutions, how HBCUs' arts and cultural training is preparing students to enter careers in the creative economy and in transdisciplinary fields, and what barriers and opportunities exist in HBCUs' pursuit of relationships with arts and cultural organizations and public and private funders. Accordingly, as part of its commitment to supporting HBCUs, and consistent with the IWG's ongoing work, the NEA seeks to conduct this mixed-methods study.

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.

² Available at

https://content.govdelivery.com/attachments/USED/2020/03/18/file_attachments/1404836/2.14.2 0%20Federal%20HBCU%20Competitiveness%20Framework%20-%20ODS%20%28FINAL%29.pdf.

The data collections in this information collection request will contribute to a mixedmethods study from the NEA describing how HBCUs currently support the arts and arts
education as preparatory to careers in the arts and in transdisciplinary fields. The study also will
produce recommendations on how HBCUs can strengthen and mobilize their arts assets (i.e.,
programs and facilities) and partnerships. Formed around four underlying research questions, the
study seeks to understand (1) the assets at HBCUs available to support the arts, arts education,
and the arts' integration with transdisciplinary work at HBCUs; (2) the current state of these
assets and any needs, challenges, and plans to bolster the assets; (3) the degree to which the
assets are positioning graduates of HBCUs to meet regional arts and cultural workforce needs;
and (4) the ways in which funders at the regional, state, and federal level can support existing
assets at HCBUs and contribute to local workforce demands.

As part of this study, the NEA seeks to conduct a web survey of the 103 currently operating historically black colleges and universities (HBCUs) and up to 21 virtual focus groups across three HBCUs selected for case studies (seven focus groups per case study, with up to five people in each group). The web survey is planned for August to October of 2024 and the focus groups are planned for September to November of 2024, depending on the timing of clearance.

The purpose of the HBCU web survey is to verify identified arts assets associated with each institution; query about additional arts assets; query about campus needs, challenges, and plans for supporting the arts, arts education, and integration of the arts with other fields and sectors; and query about post-graduate study or employment of students to assess whether graduates are employed or preparing for employment in arts and cultural jobs and industries that are of a high priority based on a quantitative analysis of publicly available regional workforce data on employment and wage trends.

NEA will use the information from the survey to update an internal asset mapping matrix of the arts and cultural assets available at HBCUs, which was developed based on previously collected data and a new review of HBCU websites to be used as an internal resource to assist NEA and other stakeholders to identify and support opportunities for partnerships with HBCUs. In addition, the information collected by the survey will contribute to the study's final report, institutional asset maps, and recommendations for NEA and other stakeholders regarding enhancing funding and partnerships with HBCUs. NEA may publish the final report on its website.

The purpose of the Case Study Focus Groups is to provide (1) a more in-depth examination of the current state of arts and transdisciplinary programs and arts and cultural assets at the HBCUs, and (2) an improved understanding of the value of these assets to the surrounding community, including the social, cultural, and economic opportunities for residents and workers.

The contractor will synthesize the results from the three case studies along with findings from the survey and asset mapping matrix into institutional asset maps (one for each case study). These maps will detail the institutions' cultural infrastructure and include infographics tailored to a wide audience. NEA may publish the institutional asset maps on its website.

In addition to the data collections in this request, the study will also incorporate findings from three other research activities to answer its four research questions, as shown in **Exhibit 1**. These activities are: the web scan of HBCU arts and cultural assets; virtual public listening sessions with 21 State Arts Agencies (SAAs) and four Regional Arts Organizations (RAOs) on how these public funders can better support HBCUs; and an analysis of regional workforce needs using nationally available labor projection data and other data sources to identify future arts and

cultural workforce needs at the national and regional level that could be met through HBCU arts programs and initiatives.

Exhibit 1. Crosswalk of Research Questions and the Key Study Components.

Research Questions	Web Scan	Regional Workforce Data	Listening Sessions with SAAs/RAOs	Survey of HBCU Arts Leaders	Case Studies
What assets at HBCUs are available to support the arts, arts education, and the arts' integration with transdisciplinary work (including sectors such as community development, healthcare, and STEM) at HBCUs?	~			~	~
2. What is the current state of these assets— including but not limited to programs, training, personnel, finances, partnerships, and venues (formal and informal)—in terms of needs, challenges, and future plans?	~			~	~
3. To what degree are these assets positioning HBCU graduates to meet regional arts and cultural workforce needs (within a national context), including in high-priority employment areas of the future? Are there strong examples of HBCU arts and cultural assets meeting those needs that could serve as models for other HBCUs?		~		~	~
4. In what ways can public funders at the federal, regional, and state levels support existing arts and cultural assets at HBCUs and contribute to local workforce needs?			4		4

The contractor will develop a final study report that details the study's key findings (organized by research question). The contractor will present the case studies as vignettes within the final study report; highlight areas for further analysis; and propose specific policy recommendations for NEA and other partners. The contractor will include key findings relevant to the primary audiences of this report: NEA, RAOs and SAAs, HBCU leadership and faculty, the larger HBCU research community, and student and professional artists who work with HBCUs.

In addition to the study report, the contractor will prepare the data and written materials for 3-5 infographics for inclusion in the report; these will also serve as standalone resources in their own right. Infographics will summarize key information and findings that pull together

qualitative and quantitative data from asset mappings, surveys, and case studies along with the other research activities.

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.

NEA takes its responsibility to minimize burden on respondents very seriously and has designed this project with that goal in mind. By designing a web-based survey and virtual focus groups, NEA has eliminated hundreds of hours of labor that would have been required to administer a paper-based survey and travel costs associated with in-person focus groups.

A web-based survey enables the surveying of representatives from all 103 HBCUs currently in operation. Because there are minimal costs associated with adding participants, representatives from every HBCU will have a chance to answer the survey. Thus, the electronic nature of the survey provides the most efficient mechanism for NEA to capture responses from HBCUs.

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 data collection that has been conducted or being conducted that duplicates the efforts of the proposed data collection. Existing NEA administrative data does not include information on arts and cultural assets at HBCUs, how these assets impact the surrounding community, how these assets meet regional workforce needs, or opportunities for supporting HBCUs in the future.

A5. Impacts on small businesses or other small entities.

No small business entities or other small entities are involved in this data collection.

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.

The information will be collected in a voluntary, one-time survey of HBCUs and voluntary, one-time focus groups. It is not possible to collect the information less frequently as both are one-time data collections. If the collection is not conducted, the NEA will be unable to fully understand the scope of HBCU arts and cultural assets and how these assets have impacted the employment of students in arts and cultural areas of regional workforce need. Understanding the needs, challenges, and plans of HBCUs is essential to meeting the stated goals of the agency's HBCU competitiveness plan.

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 Wednesday, December 6, 2023, a 60-day Federal Register Notice was published at 88 FR 84834 Volume 88, No. 223. One comment was received requesting a copy of the proposed information collection (see **Attachment F**), and the NEA provided draft versions of both instruments. Cognitive testing of the web survey was conducted in April 2024, with five respondents (see **Attachment C**). On Thursday, May 23, 2024, a 30-day Federal Register Notice was published at 89 FR 45679 Volume 89, No. 101.

The contractor also convened a technical working group comprised of HBCU leadership/faculty, working artists with ties to HBCUs, a representative from one Regional Arts Organization, and other individuals leading research and related efforts to support strengthening and mobilization of HBCU arts and cultural assets and improving partnerships between funders and HBCUs. To date the technical working group reviewed and provided comments to the contractor on the study research design, research questions, and the data collection instruments. The working group will help the contractor translate the research findings into meaningful recommendations for the study's primary audiences.

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

2M will offer a \$20 token of appreciation to each survey participant in the form of a prepaid debit card upon completion of the survey. Additionally, 2M will pay a \$50 token of appreciation per participant in each focus group. The tokens of appreciation are offered to increase the response rate and to offset any costs associated with participation. 2M will submit all proposed respondents to NEA for approval prior to contacting them for participation.

A10. Assurances of confidentiality provided to respondents.

The web survey includes the institution name of the respondent and a list of arts and cultural assets found on the HBCU's website. The survey introduction and email communications include a statement to respondents that all data for the survey that is provided to the NEA will not include information identifying respondent names or HBCU institution names and NEA will keep individual response data confidential to the extent permitted by law. The contractor will report information collected from the survey in aggregate except for arts and cultural asset information, which will be extracted from the survey dataset and reported in an asset mapping matrix for each HBCU. The asset mapping matrix will not include any other response information from the web survey. Respondents are also informed that the data will be

maintained by 2M Research and de-identified response information will be shared with the NEA. The contractor will provide all respondents with a description of the importance of the survey and a notification that their response to the survey is voluntary and will not impact their current or future awards from the NEA or its partners.

The focus group guide includes language that the contractor will read to respondents that informs them the discussion is voluntary, it will not impact their current or future awards from the NEA or its partners, they may decline to answer any questions, and may leave the conversation at any time with no negative consequences. In addition, the language states the contractor will not attribute names to quotes in documents that summarize the discussion. The contractor will deidentify all transcripts prior to analysis.

This effort does not request any personally identifiable information, or PII (per OMB Circular No. A-130), and does not require a Privacy Act Statement (per 5 U.S.C. §552a(e)(3)).

All survey response data and focus group recordings and transcripts will be stored on the contractor's password protected secure server with access made available only to necessary contractor staff. The contractor will securely transfer all data to NEA at the end of the contract and will delete all data from its servers. There are no plans for datasets to be shared publicly.

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. An external Institutional Review Board reviewed the protocol for this effort and approved the study as exempt from a board review (see supporting documentation in Attachment E).

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.

Table 1. Burden Estimates for 2024

Participant Description	Instrument or Activity	Number of Participant	Average Hours per	Number of Responses	Total Responses	Estimated Burden
		S	Response	per Person		(Hours)
HBCU	HBCU	206	0.33	1	206	68
leadership,	Web					
faculty, and	Survey					
staff						
HBCU	Case Study	35	1.5	1	35	52.5
leadership,	Focus					
faculty, and	Groups					
staff; student						
and alumni						
representativ						
es;						
Local, state,	Case Study	35	1.5	1	35	52.5
and regional	Focus					
arts funders	Groups					
Community	Case Study	35	1.5	1	35	52.5
arts leaders	Focus					
and partners,	Groups					
representativ						
es from						
regional						
workforce						
development						
boards;						
community						
organizers						
	Total	311	0.73	1	311	225.5

The total estimated burden for 2024 is 225.5 hours. This estimate includes 20 minutes per survey response, based on cognitive testing of the survey instrument, and 90 minutes per focus group participant based on staff and Technical Working Group review. The NEA will not ask HBCU staff who participated in cognitive testing to participate in the survey data collection.

Table 2. Estimated Annualized Burden and Costs to Respondents for 2024

Participant Description	Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
HBCU leadership, faculty, and staff	HBCU Web Survey	206	1	0.33	68	68	\$45.17	\$3,071.56
HBCU leadership, faculty, and staff; student and alumni representati ves	Case Study Focus Groups	35	1	1.5	52.5	52.5	\$45.17	\$2,032.65
Local, state, and regional arts funders		35	1	1.5	52.5	52.5	\$64.24	\$2,890.80
Community arts leaders and partners, representati ves from regional workforce developmen t boards; community organizers	Case Study Focus Groups	35	1	1.5	52.5	52.5	\$28.36	\$1,276.20
Total	•	311	1	0.73	225.5	225.5	\$45.70	\$10,304.49

The estimated annualized cost burden is \$10,304.49. This is based on the above figure of 225.5 hours of respondent burden. This respondent burden is broken out into three types (1) HBCU leadership, faculty, and staff and student and alumni representatives; (2) local, state, and regional arts funders; and (3) community arts leaders and partners, representatives from regional

workforce development boards, and community organizations. Each respondent type was assigned an average hourly wage estimate per the May 2023 National Occupational Employment and Wage Estimates produced by the Bureau of Labor Statistics. The average hourly wage for the first respondent type is \$45.17, which is the average for Arts, Communications, History, and Humanities Teachers, Postsecondary. The average hourly wage for the second respondent type is \$64.24, which is the average for Fundraising Managers. The average hourly wage for the third respondent type is \$28.36, which is the average for Community and Social Service Occupations. The annual burden of each respondent type was multiplied by the average hourly wages to get an estimate of the total annualized respondent cost.

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.

There are no additional costs to respondents.

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

The total one-time contracted cost to the Federal Government for survey and focus group data collection and analysis is \$98,672.20.

Cost Category	Estimated Costs
Instrument Development and IRB/OMB Clearance	\$21,432.00
Survey Administration, Data Collection, and Analysis	\$38,564.12
Case Study Focus Group Data Collection	\$38,676.08
Total	\$98,672.20

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

This is a new information collection request. The information collected does not represent any program change.

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 study will result in a Final Study Report that details the study's key findings (organized by research question). The report will present the case studies as vignettes; highlight areas for further analysis; and propose specific policy recommendations on how HBCUs can strengthen and mobilize their arts assets (i.e., programs and facilities) and partnerships to meet regional workforce needs (both in the arts and in other sectors that utilize skills and competencies gained through an arts education). The report will also detail HBCU interactions with public arts funders at the federal, regional, and state levels, and provide recommendations on how the NEA, as well as SAAs and RAOs, can engage further with HBCUs.

Table 3. Project Schedule

Activity	Expected Activity Period
Survey data collection begins	August 2024
Develop case study sample and recruit focus groups	September 2024
Complete survey data collection	October 2024
Complete focus groups	November 2024
Submit final survey findings report	January 2025
Submit final institutional asset maps	March 2025

Meet with Technical Working Group to review final study report and discuss future research and findings dissemination.	April 2025
Submit finalized study report and infographics	May 2025

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.

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. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.