

National Endowment for the Arts Supporting Statement

NEA Funding Reporting Requirements - 2025 Final Descriptive Reports Update

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 Chair establishes eligibility requirements and criteria for the review of applications (see OMB Control No. 3135-0112). Awards are made to nonprofit organizations, government agencies, and individuals.

In concordance with OMB 2 CFR part 200, Final Descriptive Reports (FDR) elicit information on project activities and expenditures from individuals, nonprofit organizations, and government arts agencies that receive funding from the National Endowment for the Arts (see OMB Control No. 3135-0112 for more detail on these programs). Reporting requirements are necessary to ascertain that grant projects have been completed, and that all terms and conditions have been fulfilled.

The NEA also collects information regarding participation in and location of project activities to understand the reach and geographic distribution of NEA-approved grant and cooperative agreement activities. Participation data, including in-person and virtual engagement counts and demographic characteristics of populations served, is collected in the FDR form. Geographic information is collected through the Geographic Location of Project Activity (or GEO) portion of the Final Descriptive Report. This information is used in our reports to Congress, the federal Office of Management and Budget, and the public.

The agency previously submitted a clearance package for FDRs (OMB Control No. 3135-0140) and we are revising this clearance package.

We are adding nine new forms to the PRA package last cleared in November 2022 (ICR Reference No. 202208-3135-001 / OMB Control No. 3135-0140): FY27 Standard FDR form, FY27 Arts Education FDR form, FY27 SAA-RAO FDR form, FY27 Research FDR form, the FY27 Poetry Out Loud FDR form, the Creative Forces Community Engagement FDR form, and the Creative Forces Community Engagement Interim Report. Additionally, two quarterly reports for NEA Research Lab and Cooperative Agreement awardees, as well as one annual report for awardees that have periods of performance extending further than one year. Some of these forms were previously included on a different PRA clearance package (OMB Control No. 3135-0112) and are being consolidated into this package. There

is one new annual performance form for open awards with periods of performance over one year.

The FY27 Standard FDR form, FY27 Arts Education FDR form, FY27 SAA-RAO FDR form and Creative Forces forms are based largely on the corresponding FY24 FDR forms that were cleared in November 2022. The following substantial changes were made globally across this set of forms:

- 1) reordered and reworded narrative questions
- 2) revised the individuals benefited section, removing the collection of race and ethnicity data on project beneficiaries
- 3) removed questions collecting data on the synchronicity of virtual and in-person project activities to reduce burden. These data were previously added to monitor compliance during the COVID-19 era when many awardees were transitioning activities to virtual spaces, which is no longer needed.
- 4) Removed questions collecting data on how awardees monitored progress toward project goals to reduce burden. This question was determined to be redundant as similar information is collected other narrative response questions in the report form.

In addition to global changes, there are some unique changes:

- A) The FY27 SAA-RAO FDR form now includes a brief narrative response question to aid the Agency's Office of Grants Management in ensuring subgrant reporting compliance. The accompanying directions also require the awardee to copy the Agency's Office of Grants Management on email FDR submissions to assist in confirming compliance. In addition, some populations benefited fields have been removed in order to reduce burden to small organizations. The change is consistent with previous OMB guidance to look at location data rather than self-reported data on beneficiaries.
- B) The FY24 Arts Education FDR was revised to streamline the narrative questions for Direct Learning and Professional Development projects. The Collective Impact questions were removed as this project type is no longer supported after FY26.
- C) The FY27 Poetry Out Loud FDR was minorly revised to bring the form into accordance with other agency final report forms. Based on underutilization of data collected, narrative questions and project output questions were removed to reduce burden.
- D) The FY27 Research FDR was revised to streamline narrative questions to focus more immediately on project results and direct project beneficiaries. Two questions were added to collect the number of individuals (students, faculty, and staff) directly supported by the project. One question collects information about individuals receiving monetary support, while the other collects the number of individuals supported in other ways such as receiving education, experience, or publication credits. The collection of this type of information allows the agency to more accurately report on its strategic goal of advancing research and information-sharing, as outlined in the agency's strategic plan.

- E) The Pass-Thru Subaward Spreadsheet report has been renamed from the LAA Subaward Spreadsheet report since it will now be used for any award with pass-through funding. This will account for about 4 more entities per year filling out this report.
- F) The Creative Forces Interim Report was revised to replace the Supplemental Application Form, reflecting changing program needs. The Creative Forces FDR was revised to bring the form into accordance with other agency final report forms.

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.

Final Descriptive Reports (FDR), and subgrant data as relevant, are required to be submitted by grantees/prime recipients in order to ascertain that funded projects are proceeding with and/or have been completed according to all of the terms and conditions of the federal grant. The submitted forms are reviewed for compliance by the NEA Office of Grants Management staff and then turned over to the respective discipline offices for review.

The NEA Office of Research and Analysis uses FDR and subgrant data for analysis and evaluation of grant programs. In the case of subgrants, this data is used to understand the full reach of NEA grantmaking which extends beyond direct grant awards. Subgrant data is also collected to ensure their compliance with terms and conditions of federal grants. Findings from the analyses of this data are also used in the Agency's Annual Performance Report, which is submitted to OMB and Congress.

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.

Beginning with grants made in the Fiscal Year 2012 award cycle, Final Descriptive Reports (FDR) must be submitted to the Agency electronically. The NEA posts all of the instructions and forms for its reporting requirements on its website, under the [Manage Your Award](#) tab. FDRs from fiscal year 2020 and later and the GEO portion of the Final Report are fillable webforms submitted through NEA's online awards management system, [REACH](#). FDRs from fiscal year 2019 and earlier are submitted as fillable PDF forms. In addition, the new Participation List for the Poetry Out Loud initiative, the FY27 Pass-Thru Subaward Spreadsheet are Excel spreadsheets to be filled out by grantees and submitted to NEA program staff as instructed in the [Manage Your Award](#) tab. Additional forms, as relevant, use either electronic fillable webforms or PDF forms.

The NEA has refined its electronic reporting systems in response to government-wide initiatives (such as the Foundations for Evidence-Based Policymaking Act of 2018) and to the agency's desire to improve efficiency and the reliability and usefulness of the information collected. This has created efficiencies for staff by electronically validating what is submitted, as well as providing us with easy access to information in data fields for dissemination, decision-making, and research purposes. We will continue to explore ways to refine our information technology systems for the benefit of applicants, grantees, 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 reports on projects funded require specific information about federally funded activities that were carried out during the project period. Each year, most applicants apply and report on a single, specific project. This project changes from year to year, as do the personnel involved and the project budget. Much of the information collected one year is not relevant to the next year's request.

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 and subsequent awards are aimed specifically at sections of the country, areas of cities, and rural areas that may not be 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. All of our reporting requirements 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.

Both OMB 2 CFR Part 200 and the NEA's enabling legislation (as amended) require the collection of reports from grant recipients. Without these reports, the agency would not be able to determine whether funded activities were conducted according to the terms and conditions of the federal grant. The application guidelines also state that acceptable reports must be received by the report due dates in order for previous grantees to maintain eligibility for future awards.

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 its information from grantees in a manner that does not necessitate any of the special requirements noted above.

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 60-day notice for public comment was published in the Federal Register, Vol. 90, 21080 (document 2025-08782) on May 16, 2025, to solicit comments on the "2025 Final Descriptive Report Update" prior to submission of this OMB clearance request. One public comment was received and taken into consideration at the National

Endowment for the Arts in response to this notice. A 30-day notice for public comment was also published in the Federal Register, Vol. 90, 43234 (document 2025-17119) on September 8, 2025.

NEA staff members also consult regularly with individuals in their fields nationwide. Service organizations and state arts agencies sometimes provide suggestions on report forms and requirements from their constituents. NEA cooperator National Assembly of State Arts Agencies (NASAA) facilitates data-related technical assistance for the State and Regional FDR form. As such, NASAA has previously asked state and regional representatives questions related to their ability to collect audience counts from virtual, in-person, and hybrid events and their ability to collect data on individuals compensated; feedback from this prior consultation informed current revisions to the FDR form.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration 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 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 BURDEN (IN HOURS) FOR REPORTING

The chart below is broken out by the three basic types of recipients that receive funding awards from the NEA. Figures are based on a frequency of one response per year for reporting.

Type of Recipient	Est. # of Grant Reports	Average Time per Report	Est. Reporting Burden for Grant Reports (Hours)
Nonprofit Orgs	9,661	2.0	19,322
Gov Agencies	2,057	2.3	4,731
Individuals	20	1.0	20
Totals	11,738		24,073

The total reporting requirements burden is estimated at 24,073 hours. This burden is calculated by multiplying the estimated number of grants for each type of recipient x the estimated hourly response burden for that type x 1 response per year. The category totals are added together for an agency-wide estimate of 24,073 hours. With an agency-wide estimate of 11,738 grant reports, this works out to an agency average of approximately 2.0 hours per response. This agency-wide average includes both nonprofits and government agencies whose reporting burden is estimated at 2.0 and 2.3 hours, respectively, and individuals where the estimate is 1 hour per grantee. Note that these estimates reflect the approximate number of reports we expect to receive annually, but also include reports we expect to receive from prior years. Because some grants are multi-year awards, grant reports are received unevenly.

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.

COST TO RESPONDENTS/REPORTING

Type of Recipient	Est. # of Grant Reports	Average # of Hours per Grant Report	Total Hours	Average Hourly Wage	Total
Nonprofit Orgs	9,661	2.0	19,322	\$28.50	\$550,677
Gov Agencies	2,057	2.3	4,731	\$28.50	\$134,836
Individuals	20	1.0	20	\$51.50	\$1,030
TOTALS	11,738		24,073		\$686,543

TOTAL COST TO RESPONDENTS = \$686,543

The total estimated burden to grantees is \$686,543.

The figures above were estimated as follows. NEA staff was consulted as to the division of respondent time between Professional Staff and Support Staff for each type of recipient. This division of labor is estimated at approximately 50% for professional staff (\$38/hour) and 50% for support staff (\$19/hour). The average hourly wage of \$28.50 was computed factoring in professional support staff wages proportionate to the amount of time each typically spends preparing reports. Salaries for personnel at nonprofit organizations and government agencies were estimated based on 1) salaries provided in the NEA's past submission under PRA increased using the Consumer Price Index; and 2) a sampling of salaries presented in current applications; and 3) consultation with NEA staff. Salaries for individuals were estimated based on 1) 2024-2025 average salaries for assistant professors and instructors at U.S. colleges and universities; and 2) consultation with NEA staff.

- 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.**

COST TO FEDERAL GOVERNMENT

NEA Application/Report Review

Type of Review	Est. # Grants	Average # of Hours per Application or Report	Total Hours	Average Hourly Wage	Total
Reports	11,738	2.0	24,073	\$75.11	\$1,808,123

COST TO FEDERAL GOVERNMENT = \$1,808,123

In the chart above, the estimated number of hours for staff review of reports is based on staff experience with these tasks over a number of years. The average hourly wages were developed in consultation with agency staff, based on the following. The review of reports averages 2 hours per report by a Final Reports Officer (average wage GS 12/Step 10 using Washington, DC locality). The pay here, provides an estimated hourly rate of \$75.11. The total cost to federal government is calculated by estimated number of reports x average number of hours per report x average hourly wage.

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

Final Descriptive Reports were previously approved under OMB Control No. 3135-0140. Based on the relevant burden hours from the previous OMB control number (2022) and compared to the current submission, our overall estimated number of grants has decreased, from 15,838 to a current estimate of 11,738. In addition to minor updates to forms, decreases in cost burden, both for respondents and the federal government, are due primarily to the following factors: the total number of grantees submitting FDRs from previous years has decreased (changes in agency priorities required expedited closeouts or terminations for many awards); multiple grant programs have been discontinued or consolidated into Grants for Arts Projects; and the FDR forms have been reduced overall in terms of character count and the number of questions (details explained above).

The forms that were previously cleared are still in use currently, so the new forms represent data collections to be added to the preexisting collections. To reduce burden, we have removed older forms that were intended for any award in FY2019 or earlier, since these awards have been closed out. These forms include: FY17 LIT Fellows FDR, SAA-RAO FY18, FY19 Standard FDR, FY19 Our Town FDR, FY19 Arts Ed FDR, FY18 GEO Form, FY17 GEO Form, FY18 Multi-Use FDR, FY15-17 Livability FDR, FY15-17 Arts Ed FDR, FY12-14 Standard FDR, FY12-14 Livability FDR, FY15-17 Standard FDR.

The NEA remains committed to supporting the arts in communities – large and small, urban and rural– throughout the country, and continues to engage in outreach activities to connect with underserved areas. In addition, the posting of our guidelines on the Agency's website and a series of guidelines webinars has increased awareness of and access to our grant opportunities throughout the country.

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.

FDRs include data pertaining to many of the Agency's strategic objectives and utilized in drafting the Agency's Annual Performance Report. The Government Performance and Results Act (GPRA) Modernization Act and the Office of Management and Budget (OMB) require that agencies report on their performance at the end of each fiscal year. The Annual Performance Report provides information on the Agency's progress achieving the goals and objectives described in the Agency's Strategic Plan, including progress on strategic objectives and performance goals.

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 reporting requirements.

**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.