INFORMATION RESOURCE MANAGEMENT STRATEGIC PLAN FY22 – FY26

National Endowment for the Arts

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Introduction

Information technology systems and services are integral to the National Endowment for the Arts' (NEA) operations and attainment of agency strategic goals and objectives. The NEA Information Resource Management (IRM) Strategic Plan is intended to align agency IRM activities with the broader strategic goals and objectives found in the NEA Strategic Plan. The IRM Strategic Plan communicates long-term information and technology management direction for agency leadership, program area staff, and employees directly supporting IRM activities.

This document is a living document which will be periodically revisited to account for the ever-evolving technical landscape and the technical support that is provided to the NEA. The IRM Strategic Plan will be reviewed during the annual operating planning cycle to ensure the goals, objectives, and initiatives remain relevant. Due to possible shifts in agency direction or technological advancements the initiatives and their anticipated timelines can also be adjusted during the review period.

1.0 About the Office of Information Technology Management

The Office of Information Technology Management (OITM) is integral to the success of the NEA's mission. The office is comprised of a cybersecurity team, an infrastructure team, applications development team, and a governance team.

1.1 OITM Vision and Mission

NEA OITM Vision Statement:

A secure, efficient, and agile information enterprise that enhances NEA's operational mission

NEA OITM Mission Statement:

To advance information technology through leadership, security, and customer service in support of artistic excellence, creativity, and innovation

1.2 Guiding Principles

Guiding Principles:

The Guiding Principles are fundamental philosophies that express how OITM plans for, acquires, deploys, uses, and manages IT resources. The following guiding principles will direct the work of the OITM through its implementation of this Plan:

1. Prioritize system performance
2. Explore and promote a scalable and innovative enterprise architecture
3. Explore and promote opportunities to utilize shared-service offerings
4. Provide customer-centric IT solutions
5. Encourage a culture of continuous improvement
6. Continuously strengthen cybersecurity
7. Promote a knowledgeable and talented IT staff

2.0 NEA OITM Strategic Goals & Objectives

NEA OITM Strategic Goals

The IT goals in the NEA IRM Strategic Plan align with and support both the NEA goals from the NEA Strategic Plan FY 2022 - 2026, and OMB Guidance.

The IRM Strategic Plan describes the four areas of primary focus (IT Strategic Goals) for the Agency:

Goal 1: Ensure reliable, secure, high performing information technology services to support business needs

We will maintain and update the Enterprise Architecture in alignment with the NEA's strategic goals and business strategy. We will review the NEA's business processes and ensure that we thoroughly understand and evaluate them to determine what can be automated.

Objective 1.1 Mobile Computing and Collaboration

Continue support for mobile computing and prepare for further use of the technology and security in order to provide the NEA workforce with a more efficient and flexible work environment. New technology allows employees to communicate, collaborate, and work more efficiently. The NEA will leverage these technologies to empower the workforce with innovative, collaborative tools.

Objective 1.2 Enhanced Infrastructure

The NEA's move to the cloud will continue to offer modern services to the agency that are similar to how people are accustomed to using technology in their everyday lives. Our secure, commercial, FedRAMP cloud infrastructure and private access platform will allow OITM to provide the NEA staff with the products and tools necessary to do their jobs wherever and whenever they need. The agency's cloud initiative provides the foundation for the overall IT infrastructure architecture.

IPv6 is the next generation Internet protocol, designed to replace IPv4. It is essential for the NEA to fully transition to IPv6 in order to keep pace with and capitalize on industry trends, as well as the technical, economic, and security benefits of operating a modern scalable network infrastructure.

Objective 1.3 Enhanced Security

OITM will include enterprise security management, continuous monitoring, and identity and access management which includes single-sign-on.

We will assess current security risk policy for alignment with acceptable security risk thresholds and devise cloud security requirements to determine the security services and level of protection required for client data and information in the cloud.

We will focus on implementing the latest in proven cybersecurity techniques and technologies including upgrading to a Zero Trust Architecture (ZTA).

<u>Goal 1 Strategic Initiatives</u>

Position NEA's Council Book Viewer as a public facing application by the end of FY2023

20% of the NEA's IP-enabled assets are IPv6 compliant by the end of FY2023

50% of the NEA's IP-enabled assets are IPv6 compliant by the end of FY2024

80% of the NEA's IP-enabled assets are IPv6 compliant by the end of FY2025

Transition the NEA network architecture to Zero Trust Architecture by the end of FY2024

Increase collaboration through the automation of workflows using SharePoint by end of FY2026

Goal 1 Key Performance Measures

Percentage of the NEA's IP-enabled assets transitioned to IPv6 compliance by the end of each fiscal year.

Percentage of the NEA's critical technical assets migrated to the agency's cloud service provider.

Progress reflected on the CISA ZTA Maturity Model

Goal 2: Expand capabilities and partnerships to gain efficiencies in IT operations

To improve our ability to serve the NEA and the American Public despite diminishing resources, we must continue to develop strong alliances with other government agencies and the private sector. This will allow the agency and other entities to gain efficiencies and capabilities through shared services and lessons learned. We will use managed processes, where available, to deliver IT services.

Objective 2.1 Grant Management System

Continue the strong, close relationship that the NEA and OITM have with NEH on the development and use of the electronic Grants Management System (eGMS). Provide recommendations and requirements in order to build out the system to best meet the needs of the NEA staff as well as the NEA customers.

Objective 2.2 Financial systems

Continue the strong, close relationship the NEA and OITM have with the FAA and use of their Delphi financial systems. Explore opportunities to expand upon the offering with contract services and other financial processes.

Objective 2.3 Explore opportunities

Complete a thorough review of the IT offerings provided by OITM and current partners to find areas to expand the shared services portfolio. Identify areas of possible automation and new services in which the agency does not currently take advantage.

Goal 2 Strategic Initiatives

Identify and explore options for introducing a contract management system for ASO in FY2022

Identify, explore options, and introduce a legal case management system to OGC in FY2022

Identify, explore options, and introduce Security Operations Center (SOC) as a Service as a shared service for the agency in FY2023

Use external shared program services to establish the Authorization to Operate (ATO) packages for the NEA systems.

Goal 2 Key Performance Measures

Percentage of meetings attended with the eGMS Steering Committee

Percentage of meetings attended with the FAA on Delphi Financial Systems shared service

Introduce a new legal case management system to OGC

Introduce SOC as a Service to the agency

Goal 3: Recruit, train, advance, and retain skilled IT workforce to meet increased demands

NEA depends greatly on its staff to successfully accomplish our mission. In OITM, the senior IT leadership identifies IT related occupations and competencies that are essential to achieving strategic goals; identifies competency gaps and deficiencies, including current and future competency needs and losses due to attrition.

Objective 3.1 Recruitment and Succession Strategy

Create and implement an IRM recruitment and succession plan to position the NEA as an employer of choice for IT positions. The plan will outline ways to attract and hire a highly skilled set of IT professionals.

Objective 3.2 Professional Development

Develop an IT learning strategy to standardize core knowledge, skills, and abilities (KSAs) across the OITM. This will provide the NEA with a highly skilled IT workforce that meets both current and future IT personnel needs.

Objective 3.3 Retention

Ensure that the pay is equal to the job. Provide career paths for the staff to grow into and design cross-functional developmental assignments to increase new job opportunities for employees.

Goal 3 Strategic Initiatives

Train all OITM staff to be technically familiar with the agency's core technical products

100% of OITM staff with individual development plans starting in FY2022

Goal 3 Key Performance Measures

Percentage of OITM staff on individual development plans

Percentage of OITM staff technically familiar with the agency's core technical products

Goal 4: Customer-centric IT Services

It is imperative that IT help the customers perform work more efficiently and effectively. Improved data collection and monitoring of internal and external end-user needs, including accessibility, will inform all IT design, development, and acquisition efforts.

Objective 4.1 Customer Experience

Priority of IT support-services required by agency personnel will be based on support of the mission and user-based requirements. OITM will strengthen the business requirements analysis capability to tailor services to the needs of the mission and business priorities.

Objective 4.2 Customer Success Management

OITM will provide customer success management through sustained engagement with users within the agency to liaison on IRM service performance and ongoing support needs. Consistent engagement and monitoring of emerging end-user needs ensures that OITM can expeditiously address critical pain points that affect mission operations.

Objective 4.3 Customer Service Monitoring

OITM will obtain customer feedback through periodic surveys and user groups to understand the effectiveness of our offerings and performance. The user data will enable OITM to evaluate services to define improvements in order to maximize overall customer satisfaction.

Objective 4.4 Section 508

We aspire to be a leader in providing accessible information and communications technology to the NEA staff and the American public. We will accomplish this by developing a comprehensive Section 508 training program for NEA agency staff and include Section 508 standards and requirements in our development, implementation, and maintenance of information and communications technology. Our dedicated Section 508 compliance manager will develop and provide technical guidance, tools, and resources to assist with Section 508 compliance. Section 508 standards and requirements will be included in our procurement processes. We will also engage with vendors to provide high-quality consulting and testing services to support agency Section 508 compliance activities.

Goal 4 Strategic Initiatives

Solicit feedback from NEA stakeholders after IT product implementation and support starting in FY2022

Hire a Section 508 contractor to analyze NEA applications in FY2024

Upgrade the NEA's SharePoint user experience with a user-friendly interface by FY2026

Goal 4 Key Performance Measures

Maintain a 90% or higher customer service score on OITM customer service surveys

Percentage of NEA-based applications and systems maintaining Section 508 compliance

Number of NEA offices with updated web design for SharePoint

NATIONAL ENDOWMENT FOR THE ARTS

Open Data Plan

June 20, 2025

Contents

Introduction

The National Endowment for the Arts' (NEA) Open Data Plan (the "Plan") is drafted in accordance with the May 9, 2013, Open Data Memorandum (OMB M-13-13), Project Open Data, the OPEN government Data Act, and the Foundations for Evidence-based Policymaking Memorandum (OMB M-19-23), and Phase 2 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Open Government Data Access and Management Guidance (OMB M-25-05). These memoranda require agencies to open data and information in machine-readable formats in order to fuel innovation in government and the private sector.

Through the Plan, the NEA recognizes that information is a valuable national resource and a strategic asset to the Federal Government, its partners, and the public. Managing these data as an asset and making them open – meaning available, discoverable, and usable – not only strengthens our democracy and promotes efficiency and effectiveness in government, but also has the potential to create economic opportunity and improve citizens' quality of life[1]. NEA open data efforts are an expansion of the Arts Endowment's work in Open Government and Digital Government Strategy, and support our mission of ensuring access for all Americans to participate in the arts.

The Plan is included with the NEA's Information Resource Management Strategic Plan, which describes how information resource management activities help accomplish NEA missions, including how they support government-wide financial management priorities, to include better integration of budget, cost, and performance data.

Definitions

The Plan establishes definitions for commonly used terms in the Plan, as well as in the related policies and memoranda.

Data means "recorded information, regardless of form or the media on which the data is recorded."[2]

Data asset means "a collection of data elements or data sets that may be grouped together."[3]

Dissemination means "the government-initiated distribution of information to a non-government entity, including the public. The term 'dissemination' does not include distribution limited to Federal Government employees, intra- or interagency use or sharing of Federal information, or responses to requests for agency records under the Freedom of Information Act (5 U.S.C. § 552) or the Privacy Act (5 U.S.C. § 552a)."[4]

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[1] https://project-open-data.cio.gov/
[2] *Id.* § 3502(16).
[3] *Id.* § 3502(17).
[4] OMB Circular No. A-130, § 10(a)(18).

Machine-readable means, when used with respect to data, "data in a format that can be easily processed by a computer without human intervention while ensuring no semantic meaning is lost."[5]

Metadata means "structural or descriptive information about data such as content, format, source, rights, accuracy, provenance, frequency, periodicity, granularity, publisher or responsible party, contact information, method of collection, and other descriptions."[6]

Mosaic effect means the particular risk that a data asset will allow for the compromise of a protected interest (such as privacy, national security, or law enforcement interests) when the data asset is combined with other available information. The mosaic effect occurs when the information in an individual data asset, in isolation, may not pose a risk of, for example, identifying an individual, but when combined with other available information, could pose such risk. Before disclosing potential personally identifiable information (PII) or other potentially sensitive information, agencies must consider other publicly available data – in any medium and from any source – to determine whether some combination of existing data and the data intended to be publicly released could allow for the identification of an individual or pose a security concern.

Open format means a file format for storing digital data where that format is platform independent and machine readable and is maintained (A) at no cost to the public; and (B) with no restrictions on copying, publishing, distributing, transmitting, citing, or adapting such format.

Open Government data asset means "a public data asset that is—(A) machine-readable; (B) available (or could be made available) in an open format; (C) not encumbered by restrictions, other than intellectual property rights, including under titles 17 and 35 [of the U.S. Code], that would impede the use or reuse of such asset; and (D) based on an underlying open standard that is maintained by a standards organization."[7]

Open license means "a legal guarantee that a data asset is made available (A) at no cost to the public; and (B) with no restrictions on copying, publishing, distributing, transmitting, citing, or adapting such asset."[8]

Open standard means a standard that is freely available to the public to access, use, and share.

Personally identifiable information (PII) means "information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual."[9]

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[5] *Id.* § 3502(18).
[6] *Id.* § 3502(19).
[7] 44 U.S.C. § 3502(20). For the purposes of this guidance, the term "standards organization" includes the National Institute of Standards and Technology.
[8] *Id.* § 3502(21).
[9] OMB Circular No. A-130, § 10(57).

Public data asset means "a data asset, or part thereof, maintained by the Federal Government that has been, or may be, released to the public, including any data asset, or part thereof, subject to disclosure under [5 U.S.C. § 552]."[10]

NEA requirements that apply to all data assets[11]

Understanding the OPEN Government Data Act's definition of a "data asset"—i.e., "a collection of data elements or data sets that may be grouped together"—is central to implementing the requirements of the Act and this Plan. To qualify as a data asset under the Act, the data must meet the criteria below:

- *Structured*: Data assets must be composed of structured or semi-structured data.[12] Examples of data assets composed of structured data include rectangular or tabular data organized into rows and columns, a database of digital images, and a set of files containing geospatial polygons in the same coordinate system. Examples of data assets composed of semi-structured data include data in formats like the Extensible Markup Language (XML) and JavaScript Object Notation (JSON).[13] Agencies may exercise reasonable discretion in determining whether any collection of data is sufficiently structured to be considered a data asset.

- *Logically grouped*: To qualify as a "data asset," data must be composed of a logical grouping of data elements or data sets. This may consist of data grouped together based on similar characteristics, a shared function or purpose, or some other logical method. A simple collection of unrelated data elements or data sets does not constitute a data asset. Similarly, a collection of many data sets that do not share a reasonably discernible common characteristic or theme does not constitute a data asset.

The Plan establishes that the Arts Endowment may not use other criteria to limit the definition of the term "data asset." For example, a database procured through a contract may be a data asset subject to the requirements of this Plan, even if the contents of the database are owned by a private party.

Open Data Principles

The Plan establishes that, in general, open data at the National Endowment for the Arts will be consistent with the following principles from the Office of Management and Budget (OMB)[14]:

- Public. Consistent with OMB's Open Government Directive, the NEA will adopt a presumption in favor of openness to the extent permitted by law and subject to privacy, confidentiality, security, or other valid restrictions.

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[10] 44 U.S.C. § 3502(22).

[11] M-25-05

[12] For descriptions of structured, semi-structured, and unstructured data, *see* William Newhouse et al., Nat'l Inst. Of Standards & Tech., NIST Internal Report (IR) 8496, *Data Classification Concepts and Considerations for Improving Data Protection* (Nov. 2023), *available at* doi.org/10.6028/NIST.IR.8496.ipd.

[13] *See* NIST SP 1500-18r2 Research Data Framework (RDaF), *available at* doi.org/10.6028/NIST.SP.1500-18r2.

[14] https://project-open-data.cio.gov/principles/

- Accessible. Open data are made available in convenient, modifiable, and open formats that can be retrieved, downloaded, indexed, and searched. Formats should be machine-readable (i.e., data are reasonably structured to allow automated processing). Open data structures do not discriminate against any person or group of persons and should be made available to the widest range of users for the widest range of purposes, often by providing the data in multiple formats for consumption. To the extent permitted by law, these formats should be non-proprietary, publicly available, and no restrictions should be placed upon their use.

- Described. Open data are described fully so that consumers of the data have sufficient information to understand their strengths, weaknesses, analytical limitations, security requirements, as well as how to process them. This involves the use of robust, granular metadata (i.e., fields or elements that describe data), thorough documentation of data elements, data dictionaries, and, if applicable, additional descriptions of the purpose of the collection, the population of interest, the characteristics of the sample, and the method of data collection.

- Reusable. Open data are made available under an open license that places no restrictions on their use.

- Complete. Open data are published in primary forms (i.e., as collected at the source), with the finest possible level of granularity that is practicable and permitted by law and other requirements. Derived or aggregate open data should also be published but must reference the primary data.

- Timely. Open data are made available as quickly as necessary to preserve the value of the data. Frequency of release should account for key audiences and downstream needs.

- Managed Post-Release. A point of contact must be designated to assist with data use and to respond to complaints about adherence to these open data requirements.

Standards, Specifications, and Formats Supporting Open Data Objectives

Consistent with existing Arts Endowment responsibilities under OMB Circular A-119 (Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities), and M-12-08, the Plan establishes the use of consensus standards, specifications, and formats to support open data objectives. The NEA, system owners, and data owners should, wherever possible, consider relevant international and US standards for data elements. Standards bodies dealing with data include[15]:

International Standards

- ISO
- United Nations Centre for Trade Facilitation and Electronic Business (UN/CEFACT)
- W3C The World Wide Web Consortium

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[15] https://project-open-data.cio.gov/open-standards/

- [IETF The Internet Engineering Task Force](#)

US National Standards

- [American National Standards Institute (ANSI)](#)
- [International Committee for Information Technology Standards (INCITS)](#)

US Federal Government Standards

- [The Federal Geographic Data Committee (FGDC)](#)
- [The National Information Exchange Model (NIEM)](#)

Senior Key Officials

Chief Data Officer – Sunil Iyengar

Chief Information Officer – James Tunnessen

Chief FOIA Officer – Jean Choi

Senior Agency Official for Privacy (SAOP) – James Tunnessen

Open Data Point of Contact – Kathryn Zickuhr

Data Governance Board

To meet federal requirements, the NEA created the Data Governance Board (DGB) in 2019. The DGB is responsible for monitoring the quality of the NEA's data assets, with the goal of improving accuracy, reliability, timeliness, and validity. The DGB is committed to managing and safeguarding data as a strategic asset, in keeping with applicable legal, policy, and mission requirements. The DGB is authorized to develop, review, or update Arts Endowment policies or guidance documents related to data acquisition or maintenance, data-sharing, or data protection, privacy, and confidentiality. It also has authority to respond to *ad hoc* issues or requests concerning data quality.

Members of the Data Governance Board include the Chief Data Officer; Chief Information Officer; Director of the Office of Programs & Partnerships; Senior Advisor for Programs & Partnerships; and the NEA's General Counsel, as well as representatives from offices serving the following functions: Administrative Services; Civil Rights & Equal Employment Opportunity; Guidelines and Panel Operations; and Research & Analysis.

Requirements of the OPEN Government Data Act

The Plan describes how the NEA continues to progress in meeting the following core requirements of OPEN Government Data Act.

- Publish data in open formats

- Maintain comprehensive data inventories

- Engage with the public about Agency data

The Agency will comply with all requirements of the OPEN Government Data Act, OMB M-25-05, and 44 U.S.C. § 3511 when disseminating a public data asset.

Open Data Goals

To meet the requirements of the OPEN Government Data Act, the NEA is committed to continually expanding, advancing, and opening existing and new Agency data with the following goals:

1. Expand: Maintain a Comprehensive Data Inventory (CDI) and open data assets

2. Advance: Improve the discoverability, management, and reusability of Agency data

3. Open: Facilitate collaboration and feedback with the public to understand how users value and use government data

Expand: Maintain a Comprehensive Data Inventory (CDI) and open data assets

Comprehensive Data Inventory (CDI)

To track and communicate information to the public about its data assets, the NEA will maintain a Comprehensive Data Inventory (CDI).

The OPEN Government Data Act requires each Agency to develop a CDI that "accounts for all data assets created by, collected by, under the control or direction of, or maintained by the Agency".[16] Agencies must ensure that the CDI is clear and allows the public to understand all data assets in the possession of the agency. The CDI must be included in the federal data catalogue, be updated regularly, and include:

- each data asset and all variable names and definitions,

- whether a data asset can be considered open or is partially or wholly exempt from disclosure,

- related methods of public access, and

- the owner of each data asset.

The Agency is required to update the CDI no later than 90 days after the date on which the agency creates or identifies a data asset. The Agency will also update the CDI on an ongoing basis, not less than once per year, as existing data assets are updated. The Phase 2 guidance notes the following requirements for CDIs[17]:

1. **Interoperable with the Federal Data Catalog**. GSA is responsible for developing and maintaining the Federal Data Catalog, a centralized public online interface dedicated to

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[16] 44 U.S.C. §3511
[17] M-25-05

sharing agency data assets with the public. As part of its responsibilities, GSA maintains the requirements and schema established by OMB and made publicly available through Data.gov or any successor website. Agency comprehensive data inventories must be interoperable with the Federal Data Catalog to ensure that agency information is extracted correctly and displayed there appropriately. The comprehensive data inventory must be maintained in an open format consistent with the ISO/IEC 21778:2017, commonly known as the JSON format, or a successor format.

2. **Metadata**. Each agency's comprehensive data inventory must conform to the standard metadata schema approved by OMB and available on resources.data.gov. If that schema changes, the Agency must update its inventory appropriately within one year.

3. **Public Dissemination**. Agencies must submit their comprehensive data inventory to the Federal Data Catalog as a data asset and host it publicly on the agency's website at the address: www.[agency].gov/data.json. Prior to publicly disseminating the comprehensive data inventory, agencies may redact any information that would be withheld from disclosure under FOIA. Metadata elements withheld from public release should be redacted in accordance with FOIA. For each redaction made, the agency must note the metadata element that was redacted and provide a citation to the relevant FOIA exemption in the open data plan. Agencies must share any redacted metadata with OMB upon request, to the extent sharing is legally permissible.

The Agency undertook a review of all data assets in 2020 and produced a CDI in open format. The CDI is published on the Agency website and is included in the federal data catalogue at Data.gov. The CDI is annually updated by OITM.

The Comprehensive Data Inventory (CDI) is available here: https://www.arts.gov/data

Open Data

The Agency also strives to publish machine-readable and publicly accessible Agency datasets. In reviewing the CDI, the DGB identifies datasets that potentially can be made open and public. This list of priority data sets is further outlined in the Open Data Plan's Milestones and Goals addendum, which includes a tentative roll-out schedule.

The OPEN Government Data Act and corresponding Phase 2 guidance requires that data assets be maintained in open formats to improve the efficiency and effectiveness of data-sharing among agencies and with state, local, tribal, and territorial government partners. The requirements include maintaining each data asset in open format, such as Extensible Markup Language (XML) or comma-separated values (CSV).

The Agency will use the OPEN Government Data Act and Phase 2 guidance as reference in determining if and how agency data assets are converted to open format. The Agency will consider:

- **Costs & Benefits**. The agency will consider costs and benefits associated with converting a data asset to open format and may deprioritize conversion when the cost exceeds relative benefit. The Agency will note:

- Costs, resource availability and other burdens associated with converting and maintaining the data asset in open format;

- Benefits and advantages to the agency from conversion such as furthering agency mission, meeting operational needs, reaching performance, strategic, or evaluative goals, or reducing burden associated with managing data assets;

- Benefits to the public and other data users such as other agencies or researchers such as increasing public participation, promoting governmental transparency, or improving service quality.

- **Intellectual Property Rights or Other Restrictions.** The agency will consider if data assets may be encumbered by restrictions related to property rights, contractual terms, proprietary protections, or other use restrictions.

- **Other Considerations.** The Agency will consider potential of conversion in implicating privacy, confidentiality, national security, legal liability, or other agency interests.

Data Collections

The OPEN Government Data Act also requires that any data collection mechanisms created on or after January 14, 2019, collect data in an open format. The plan establishes the following procedure for new data collections:

Data Collections approved through OMB via the Paperwork Reduction Act clearance process are vetted through various offices at the Agency including the Office of Research and Analysis (ORA) and the Office of Guidelines and Panel Operations (OGPO). For new data collections, these offices will ensure:

1. Data is collected digitally by default

2. Data collected is stored in open format

Digital Collections by Default

Data should be collected digitally by default. Most data collections facilitated by the Agency are completed digitally in grants.gov, the Applicant Portal application submission platform, or the eGMS grants management system.

For data collections requesting a physical collection mechanism, staff in ORA or OGPO will work with the requesting staff to determine if the physical collection mechanism is appropriate and necessary:

Appropriate: A physical data collection mechanism would be appropriate if digital collection would impede the investigation of the research question. This could include concerns about data integrity or if the methodology requires in-person interaction for data validity.

Necessary: A physical data collection mechanism will be necessary if the data cannot be collected digitally due to the nature of the collection. This could include considerations

such as the target participating population (e.g. lack of access, participation barriers) or the cost of implementing digital collection.

Open Storage Formats

1. For data collections submitted to OMB through ORA, staff will ensure that data is stored in open format such as Extensible Markup Language (XML) or comma-separated values (CSV).

2. For data collections submitted to OMB through OGPO, staff will ensure that data is stored in the Applicant Portal or the eGMS databases.

The Applicant Portal and the eGMS databases store data in an open format by default. The data are stored and retrieved using Microsoft SQL Server (MSQL) databases. MSQL uses SQL (Structured Query Language) to manage data in tables with rows and columns. It supports ACID (Atomicity, Consistency, Isolation, Durability) compliance. It has Built-in authentication (Windows and SQL Server logins), encryption, row-level security, and data masking. The data is housed in the Microsoft Azure Cloud.

Converting Data Collections to Open Format

When or if data collections are completed in a non-digital or non-open format, the ORA and OGPO staff are responsible for converting the data collection into open format. This can include changing file formats to the accepted Extensible Markup Language (XML) or comma-separated values (CSV) formats.

Advance: Improve the discoverability, management, and reusability of Agency data

To support public accessibility of existing and new data from the Agency, the NEA will implement Open Data principles and standards when publishing public data assets in open format. Currently, the Arts Endowment publishes much information publicly, but very little in machine-readable, open formats. This goal seeks to establish a baseline of discoverability, management, and reusability of currently available assets, coming into compliance with current open data principles and standards, as described earlier in this Plan.

To improve discoverability, management, and reusability, this Plan establishes uniform use of the W3C Data Catalog Vocabulary Version 3[18] (DCAT-US 3.0) for all open-format data published by the Arts Endowment. This schema provides a structure and common vocabulary for the metadata across open-format datasets, and is considered the common core standard for the Federal Data Catalogue at Data.gov. The schema is based on DCAT, a hierarchical vocabulary specific to datasets, and defines items such as the metadata file format, catalog fields, dataset fields, and dataset distribution fields.

This goal also establishes that the Agency will differentiate between *open data assets* and *public data assets*, as defined previously in this Plan (under "Definitions"). Public data assets are those data assets or portions of data assets maintained by an agency that are legally permitted to be disseminated to the public, *and* that meet one or more of the following criteria:

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[18] M-25-05

1. They have already been lawfully disseminated to the public;[19]

2. They are required by law to be disseminated to the public; or

3. The Arts Endowment *would* disclose them to the public in response to a FOIA request.[20]

In identifying public data assets, the CDO and Data Governance Board will involve relevant agency officials as described in the OPEN Government Data Act and corresponding Phase 2 guidance. The NEA will rely on:

- The NEA Chief FOIA Officer to determine whether any FOIA exemptions could apply to the data asset, and whether the data asset would be disclosed in response to a FOIA request; and

- The Senior Agency Official for Privacy (SAOP) to determine whether a data asset contains PII requiring additional review and disclosure protections.

<u>Attributes Generally Required for Public Data Assets</u>

Once data assets are determined to be public, the NEA will maintain these assets with the following attributes:[21]

1. **Machine-Readable.** Agencies must make each of their public data assets machine-readable.[22] For a data asset to be machine-readable, it must be digital and in an appropriate "format that can be easily processed by a computer without human intervention while ensuring no semantic meaning is lost."[23] Appropriateness of machine-readable formats may vary by data type or context. To ensure machine-readability, agencies should select a machine-readable format that is appropriate for the underlying data type and its intended use. The NEA will consider the cost and benefits to the public of converting data assets into a machine-readable format that is accessible and useful to the public.[24]

    a. **Example**: If the data asset is a spreadsheet or tabular information, the Arts Endowment will not provide this data as a scanned image or image-based PDF

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[19] There may be rare circumstances in which a dissemination of a data asset or portion of a data asset to the public that was lawful in the past would no longer be considered lawful if done in the present. In those circumstances, the Agency has discretion to determine whether it would be appropriate to label the data asset or portion of the data asset as a public data asset. Additionally, there may be rare circumstances in which the Agency experienced an unintentional, yet lawful, dissemination of a data asset or a portion of a data asset to the public. The Agency will not label a data asset or portion of a data asset as a public data asset solely based on an unintentional disclosure, even if it was lawful.

[20] The Agency will not exclude data assets or portions of data assets from the definition of public data asset simply because a FOIA exemption *could* apply; it will only exclude them if the Agency would *in fact* choose to withhold them in response to a FOIA request.

[21] M-25-05

[22] *Id.* § 3506(b)(6)(B)(i); *see also id.* §§ 3502(20), 3506(d)(5).

[23] *Id.* § 3502(18).

[24] *Id.* § 3504(b)(6)(C).

document, but rather will provide that public data asset in an appropriate format (e.g., in a character delimited format such as a CSV file).

2. **Open Formats.** Agencies are permitted and strongly encouraged to provide data assets in different formats to increase and facilitate access and use, but the Arts Endowment will seek to ensure that every data asset is maintained in an open format.

   a. Example: Although the Arts Endowment may use proprietary file formats such as Excel spreadsheets, ACCESS databases, ACCBD file formats, or ESRI geodatabase files, it will make such data assets available in an appropriate open file format such as CSV, TSV, JSON, XML, SQL, or GeoPackage.

3. **Not Encumbered by Restrictions**. Open Government data assets must not be encumbered by restrictions, other than intellectual property rights, that would impede their use or reuse.[25]Data restrictions may include impediments such as registration requirements, access fees, and usage limitations, among others.[26] The ultimate goal, with respect to open data, will be to provide broad, non-discriminatory, free access to public data assets so that any person can access information at any time without providing personal identification. The NEA will strive to remove inappropriate access restrictions whether they were intentionally or accidentally implemented.

   a. Example: The Arts Endowment may establish reasonable rate limits for APIs for open Government data assets for security purposes (*e.g.*, to protect against known or anticipated denial-of-service attacks). However, rate limits for APIs of open Government data assets will not be used to limit or restrict access sought for non-malicious purposes (*e.g.*, web scraping and archiving) and an alternative access method to the open Government data asset should be available as appropriate.

4. **Open Standards.** The structure of open Government data assets must be based on an underlying open standard that is maintained by a standards organization.[27] Open standards and specifications enable data, products, and services to be used by anyone, at any time, and they spur innovation and growth. Standards may apply to data field requirements or to metadata.

   a. The Arts Endowment will utilize appropriate standards from the National Institute of Standards and Technology (NIST), W3C standards, or voluntary consensus standards bodies (e.g., International Organization for Standardization (ISO)) whenever practicable.

5. **Open License:** The OPEN Government Data Act requires that agencies maintain each public data asset of the NEA under an open license, except as provided in this

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[25] *Id.* § 3502(20)(C).

[26] Examples of operational restrictions include: software or hardware protection mechanisms including multifactor authentication; predicating access on user response participation or user registration; digital rights management mechanisms that control content; software or hardware dongles that prevent access; unnecessary encryption or file encoding; unnecessary API (application programming interface) rate limits; unnecessary digital watermarking; or geo-blocking (or location-based access).

[27] 44 U.S.C. § 3502(20)(D).

Memorandum.[28] Generally, data and content created by Federal employees within the scope of their employment are not subject to domestic copyright protection under 17 U.S.C. § 105. As a result, it should be feasible to make most—if not the vast majority—of Agency data assets available without legal restriction. Some data, however, may be subject to privately held or other copyrights that preclude such activities as copying or modification. Data assets that cannot practically be made available under an open license are not subject to the open license requirement.

  a. Example: Some open Government data assets may have minimally restrictive licenses that are not technically open licenses under this definition. For example, an agency acquires a data set from a researcher who has assigned a Creative Commons by attribution (CC-BY) license to the asset, which requires only that the rights-holder be acknowledged when data is shared or used. The NEA can meet the requirement by indicating the CC-BY license and researcher's name in the inventory.

Agency Process for Conversion and Dissemination of Public Data Assets

In the conversion of public data assets into open format for dissemination on Data.gov, the NEA CDO and the Data Governance Board will work with three internal Agency offices, the Office of Information and Technology Management (OITM), the Office of Research and Analysis (ORA), and the Office of Public Affairs (OPA) to create public data assets in open format. ORA will create datasets in .csv format, following data field requirements outlined in the Metadata Schema. Following creation, ORA will submit the dataset to OITM. Upon receival, OITM will transform the .csv dataset to. json format, compatible with the data.gov API. OITM will then work with OPA to publish the open dataset to the Arts Endowment website, where an API will push the dataset to the Federal Data Catalog.

Federal Data Catalog

The OPEN Government Data Act establishes a Federal Data Catalog, which is "a single public interface [maintained] online as a point of entry dedicated to sharing agency data assets with the public."[29] The Federal Data Catalog, accessible on Data.gov or any successor website, is maintained by the GSA to serve as the public interface for government data asset discovery. Data.gov does not host or maintain any data assets directly; rather, it provides a centralized point of entry to discover government data assets from hundreds of decentralized locations, including Federal, state, and local governments.[30]

The OPEN Government Data Act requires agencies to submit their CDI for inclusion in the Federal Data Catalog.[31] While the underlying data assets themselves may not always be disseminated through the Federal Data Catalog, the metadata on all data assets in the Arts Endowment CDI, must appear in the Federal Data Catalog.

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[28] 44 U.S.C. § 3506(b)(6)(B)(ii).
[29] 44 U.S.C. § 3511(c)(1).
[30] M-25-05
[31] *See* 44 U.S.C. § 3511(a)(2)(D).

When the NEA chooses to disseminate a public data asset through the Federal Data Catalog, it will do so by including in the NEA's comprehensive data inventory the URL or persistent identifier[32] where the public data asset may be accessed.[33] However, not all public data assets should be disseminated to the public through the Federal Data Catalog. In determining whether the public data asset should be disseminated through the Federal Data Catalog, the Arts Endowment will consider if the Public Data Asset is Eligible and Appropriate for Dissemination.

The NEA will consider public data assets to be appropriate for dissemination unless specific concerns particular to the circumstances or nature of that data asset outweigh the presumption in favor of openness.[34] The NEA will undertake a two-step process to assess whether data asset is both eligible and appropriate for public dissemination through the Federal Data Catalog:

- ELIGIBLE: The NEA will identify which data assets or portions of data assets are legally permitted to be disseminated to the public and meet one or more of the criteria outlined in the Plan (under "Agency Process for Conversion and Dissemination of Public Data Assets.") These data assets or portions of data assets are public data assets and therefore are eligible to be *considered* for public dissemination.

- APPROPRIATE: Agencies must conduct an assessment in accordance with the criteria provided in the following section to determine which of these public data assets are *appropriate* to disseminate to the public through the Federal Data Catalog.

Assessing Risk

In determining appropriateness for dissemination through the Federal Data Catalog, the Arts Endowment will assess risk, as proactive dissemination of public data assets may introduce risks in vital areas such as national security, privacy, confidentiality, and in relation to intellectual property. In addition to the direct risk that may be posed by dissemination of a particular data asset, agencies also must consider the possible risk posed if the information in that particular data asset is combined with other available information.[35] This includes taking into account information made publicly available by other agencies as well as information generally available in the public domain, and may require additional effort to mitigate the increased risk to protected interests that may arise when the information in the public data asset is combined with other publicly available data.

To conduct an assessment of risk posed by dissemination of public data assets through the Federal Data Catalog or other avenues, the Arts Endowment will use its risk management strategy and any additional privacy impact assessments and similar tools to inform risk-based decisions address how security and privacy risk is framed, assessed, responded to, and monitored.

If risk is identified and the Arts Endowment determines that a portion of a public data asset should not be disseminated, the Arts Endowment will consider disseminating the remainder of

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[32] In this context, "persistent identifier" refers to a globally resolvable persistent URL with an open metadata schema that points to a landing page where the data can be accessed, such as a Digital Object Identifier.
[33] 44 U.S.C. § 3511(c)(1).
[34] 44 U.S.C. § 3511(a)(2)(E).
[35] *Id*. § 3504(b)(6)(A), (B); *see also id*. § 3511(a)(2)(E)(i), (ii).

the public data asset. In doing so, the NEA should remove or redact only the minimum amount of data necessary to make the asset suitable for dissemination. If the data asset is not disseminated in full, the Arts Endowment will provide an explanation in the CDI.

General considerations of risk include:

National Security Risk. Data assets maintained in other information systems may contain data that, if disseminated, would present a risk to national security. Agencies are not required to disseminate public data assets that would present such a national security risk.

Information Security Risk. Dissemination of data assets may adversely affect information security, for example, by introducing risks pertaining to network architecture or information system configuration. If the Arts Endowment determines that dissemination would have such an adverse effect, then the Arts Endowment is not required by the OPEN Government Data Act or related Memorandum to disseminate the public data asset.

Privacy and Confidentiality Risk. The dissemination of PII can pose significant risk of harm to affected individuals. In addition, the NEA will consider the reidentification risk, and potential mosaic effects, associated with the dissemination of any deidentified data. This risk can change over time and must be reassessed prior to any new dissemination of data.

Intellectual Property. The NEA will consider whether a public data asset contains material protected by Title 17 of the U.S. Code and whether publication of that data on the Federal Data Catalog could infringe copyright or otherwise risk legal liability. If it would do so, the Arts Endowment is not required to disseminate that data.

Restrictions from Contracts or Other Written Agreements. The Arts Endowment will consider whether dissemination via the Federal Data Catalog would be prohibited by or is inconsistent with a contract or other binding written agreement. Dissemination through the Catalog is not required if it creates a significant risk of a breach of contract.

Consultation with Rights Holders. Under certain circumstances, when a public data asset involves rights held by another party, consultation with that party may be relevant in determining whether the data asset may be disseminated. Some disseminations that otherwise would be prohibited by law may be permitted when the holder of the rights to a data asset has provided consent. Before disseminating such a data asset, agencies must comply with applicable law, regulation, and policy to provide any required notice to third parties, or, when appropriate, to obtain their consent.[36]

Identifying Public Interest

The NEA's process for identifying and prioritizing public data assets for dissemination includes consistent tracking of NEA data, exploratory and technical discussions involving NEA staff, and completion of the aforementioned risk assessment. The Arts Endowment's Data Governance

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[36] *See* 44 U.S.C. § 3511(a)(2)(E)(vi).

Body guides this work and will update data collected and/or generated by the Arts Endowment's activities, in alignment with the published Arts Endowment CDI and records retention schedules.

In identifying high-value public data assets, the DGB will consider public interest, taking into account FOIA and other frequent requests for data, as well as any feedback received in response to the NEA's Open Data plan after publication. When data assets are considered high value by the DGB, the board will consider privacy and risk concerns as described above before deciding the potential of the public data asset to be disseminated. This process allows the NEA to identify datasets that are determined to be of high value, of public interest, eligible, and appropriate to be disseminated through the Federal Data Catalog.

Access to Public Data Assets that are not Appropriate for Dissemination through the Federal Data Catalog

NEA data assets that are not appropriate for the broad access provided by disseminating data assets through the Federal Data Catalog, may still be useful to researchers, other agencies, organizations, Congress, and other stakeholders in the development of evidence or for other purposes.

Interested parties will be made aware of public data assets not available in the Federal Data Catalog through the Arts Endowment's CDI in the Federal Data Catalog. To obtain access to these assets, the public can request access under FOIA. The NEA's FOIA office can be found here: https://www.arts.gov/about/freedom-of-information-act-foia-guide.

Open: Facilitate collaboration and feedback with the public to understand how users value and use government data

The NEA understands the importance of engaging with the public to inform data publication efforts. To help direct the NEA's focus and prioritize which datasets are of greatest interest to the public, the NEA seeks to consider stakeholder input on potential high-value data collections through several mediums. The guiding body for data governance, the DGB, will then prioritize the conversion to open formats, based on stakeholder and public interest, as described earlier in this Plan.

The public is encouraged to view the Arts Endowment's CDI, follow NEA updates, and provide any feedback from links contained on the Arts Endowment's Open Data webpage (https://www.arts.gov/data); such communications can be directed to the NEA open data point of contact at research@arts.gov, as listed on the Open Data webpage. In addition to direct public feedback and requests, the NEA will look at information from its website metrics as indicators of what is of greatest interest to the public, including resources and publications most often accessed. The NEA will also continue to monitor FOIA requests and look for additional ways to make the data most frequently requested more easily available to the public.

Beyond interaction with open data through data.gov, the Arts Endowment engages with the public through two NEA data-related initiatives:

- National Arts Statistics and Evidence-based Reporting Center (NASERC)
- National Archive of Data on Arts and Culture (NADAC)

To learn more about NASERC and NADAC, see Appendix A.

Data Asset Usage
Each year, the National Endowment for the Arts reports on its activities under the Freedom of Information Act (FOIA). An overview of the agency's FOIA operations, as well as annual FOIA reports and annual Chief FOIA Officer reports, can be found at https://www.arts.gov/about/foia/agency-foia-reports-and-logs. Detailed information can also be found in the NEA's most recent annual report.

The NEA's plan for data usage metrics is still under development. When complete, this section of the Open Data Plan will include metrics that the NEA will share about public usage of the agency's open data, and about the extent to which the NEA's open data are shared publicly.

Improvement Processes

The NEA will evaluate the timeliness, completeness, consistency, accuracy, usefulness, and availability of open government data assets through ongoing and regular review and will consult with the Data Governance Board and key offices to improve these assets as described. As part of this process, the NEA will take into consideration public input on available open government data assets and request that specific data assets be prioritized for dissemination. Future iterations of this Open Data Plan will outline the process by which the agency will solicit and respond to public input in more detail.

NATIONAL ENDOWMENT FOR THE ARTS

Open Data Plan

Appendix A: Milestones and Goals for Agency Open Data

June 20, 2025

Goals and Milestones

Goal 1: Develop a Comprehensive Data Inventory (CDI)

#	Milestone	Description	Status	Dates
1.1	Develop plan for compiling and maintaining the CDI	Develop a process for identifying Agency data assets, creating and publishing an inventory, and maintaining updated records	The NEA developed a CDI in 2020, the inventory is posted on the Open Data webpage. Maintenance is the responsibility of OITM and the Agency's Enterprise Architect.	FY20
1.2	Create a list of priority data assets to make open	Identify data assets that have potential to be published in open format, and denote priority as related to public availability.	Priority data assets identified in 2021. See list of priority datasets.	FY21
1.3	Identify internal-only datasets	Identify internal-only datasets, and criteria for non-public data.	Responsibility of OITM and the Agency's Enterprise Architect.	FY25 Q2

Goal 2: Improve reusability of public NEA data

#	Milestone	Description	Status	Dates
2.1	Develop plan for transforming current data sets into open format	Determine a process and policy for responsibility of publishing priority open data assets.	ORA, OITM, and OPA, will work together to publish data in open format. See list of priority datasets.	FY25 Q1
2.2	Establish timeline for publishing current data sets in open format.	Determine timeline and workplan for publishing priority open data assets.	See publication schedule.	FY24 Q4

#	Milestone	Description	Status	Dates
2.3	Develop process for ensuring that any future data acquired or created use open formats	Develop standard process and policies for data acquisition and publication for new Agency data	OITM is working towards data asset mapping for the Agency. Responsibility of OITM and the Agency's Enterprise Architect.	FY25 Q4

Goal 3: Streamline records and data retention and storage policies

#	Milestone	Description	Status	Dates
3.1	Develop methods for tracking data asset usage	Develop standard process for tracking internal and external data asset access and usage	OITM is working towards data asset mapping for the Agency. Responsibility of OITM and the Agency's Enterprise Architect.	FY25 Q4
3.2	Update records retention policy.	Update Agency Records Retention policy and schedule to include digital records and assets.	Responsibility of the Office of Administrative Services in partnership with the Data Governance Board.	FY25 Q2

Goal 4: Implement processes to improve the quality, completeness, accuracy, and timeliness of data

#	Milestone	Description	Status	Dates
4.1	Create strategy for scheduled updates of open data	Establish timeline for publication of new or updated data, including offices responsible.	Responsibility for reviewing available data for updates twice annually: ORA, Program Offices. Release new or updated data annually: ORA, OITM, OPA	Ongoing – Annually following Grants Press Releases in Q2 and Q3 (January and May)

4.2	Identify processes for evaluating and improving open government data in consultation with stakeholders and the public.	Develop strategies for engaging the public on usage of open data, including development of analytical metrics.	Processes to be determined after initial publication of open data.	

Priority Dataset List

Recent Grant Search

Through the "Recent Grants" search tool on the NEA website he Agency regularly releases information about NEA grants awarded to organizations. This dataset is updated regularly after each meeting of the National Council on the Arts, when the Agency announces new grant awards. The underlying data set accessed via the search tool includes information about grant awards from 1998 to present. Data points available include grantee institution name, city, state, zip code, project description, funding fiscal year, funding program, arts discipline, application number, grant award amount, and the grant period.

Historical Grant Dataset

The Agency's historical grant data has been published through Agency annual reports (1966-1983), available in PDF format only (see https://www.arts.gov/about/annual-reports). In recent years, the NEA has worked to produce a machine-readable dataset mined from these annual reports. The Historical grant dataset includes award information for 1966 through 1983, offering a picture of federal arts funding previously unavailable. Data points available include grant ID, year, discipline information, discipline category, discipline subcategories, grant amount, funding, recipient name, recipient city, and recipient state.

Panelist Data

The Agency regularly publishes information about the subject experts who review grant applications. Panels are made up of experts with knowledge and experience in the area under review. Each application is reviewed and rated in accordance with the published review criteria. These reviewers, panelists, and/or readers, are made public regularly after each meeting of the National Council on the Arts, when the Agency announces new grant awards. Panelist information is available on the NEA website for panels from 2008 to present. Data points available include name, title, affiliated institution, layperson status, city, state, panel name, panel date, and discipline.

Schedule

2019

    Established Data Governance Board

2021

    Publish Comprehensive Data Inventory and Data Governance Priority Goals

2022

    Pilot grants data dashboards

    Produce a data dictionary

2023

    Refine grants data dashboards

    Investigate and determine next steps for processing qualitative data

    Develop Open Data Plan

2024

    Draft Open Data Plan

    Publish Open Data Plan

    Publish Recent Grants Search and Historical Grant datasets in open format

2025

    Publish Panelist dataset in open format

    Agency Update of Comprehensive Data Inventory

    Data Asset Mapping

Additional Information on NEA Data-related Initiatives

National Arts Statistics and Evidence-based Reporting Center (NASERC)

The NEA established the National Arts Statistics & Evidence-based Reporting Center (NASERC) with the goal of providing the public with continuously-updated statistics on the health and vitality of the arts in the United States. As part of this ongoing work, NASERC has created the Arts Indicators Project to track key measures across four domains: artists and other cultural workers; arts participation; arts and cultural assets' and arts and education.

NASERC is guided by a researcher/practitioner working group that has been providing input on all NASERC products to date. Over time, the center will develop a reliable reporting schedule for these indicators, and other timely products. The center will engage with the public through events like webinars, as well as products like topical reports, evidence-based guides and literature scans. The center will also provide technical assistance services to users. Please contact NASERChelpdesk@air.org to receive expert support.

National Archive of Data on Arts and Culture (NADAC)

The National Archive of Data on Arts and Culture (NADAC) is a repository that facilitates research on arts and culture by acquiring data, particularly those funded by federal agencies and other organizations, and sharing those data with researchers, policymakers, people in the arts and culture field, and the general public. NADAC is one of several topical archives hosted by the Inter-university Consortium for Political and Social Research (ICPSR), the largest social science data archive in the world and part of the University of Michigan's Institute for Social Research. As NADAC is funded by the NEA, users obtain data from NADAC at no charge.

NADAC regularly interfaces with the public, from providing webinars to compilations of relevant publications within the arts and cultural sector. NADAC also provides services to both data users and depositors. For data users, NADAC provides: a searchable catalogue of arts and cultural datasets, online analysis capability, customized subdivisions of selected datasets, assistance with retrieval and use of data files from NADAC, and more. For data depositors, NADAC provides technical assistance with data preparation, consultation on data collection to enhance the quality of the data for analysis, and confidentiality reviews of data. Consult ICPSR's Get Help with Data, or contact User Support at ICPSR-help@umich.edu or 734-647-2200.