

National Endowment for the Arts arts.gov

HOW TO MANAGE YOUR NEA AWARD

HANDBOOK FOR RECIPIENTS OF

GRANTS

AND

COOPERATIVE AGREEMENTS TO ORGANIZATIONS

Revised October 2016

Grants & Contracts Office

National Endowment for the Arts 400 7th Street, SW Washington, DC 20506 Telephone (202) 682-5403 FAX (202) 682-5610 grants@arts.gov finalreports@arts.gov arts.gov/manageaward The How to Manage Your NEA Award Handbook (the "Handbook") is a companion piece to other National Endowment for the Arts award materials, including, but not limited to, the General Terms & Conditions, payment and reporting forms, and associated instructions. The NEA Grants & Contracts staff is available to assist you with all aspects of managing your award; however we strongly encourage you to review this information in its entirety before contacting us.

Award recipients are responsible for understanding and complying with all of the terms and conditions associated with their National Endowment for the Arts award.

TABLE OF CONTENTS

Part I: BASIC AWARD ADMINISTRATION
1 Have da vea agreement instanciable that Cranta Q Co

1. How do we communicate with the Grants & Contracts Office?	
2. What's in our award notification?	
2.1 Grant award letter	
2.2 Approved project budget	3
2.3 Reporting requirements	3
2.4 General Terms & Conditions	2
2.5 Specific terms and conditions (if applicable)	2
3. How do we get our award funds?	
4. What if we need to make changes to our project?	5
4.1 Changes to the period of performance	6
4.2 Extensions for the submission of final reports	6
4.3 Changes to the project scope	6
4.4 Changes to the project budget that require prior approval	
4.5 Changes to the project that do not require prior approval	
5. How should we acknowledge support from the National Endowment for the Arts?	8
6. What reports do we need to submit for our award?	8
6.1 Progress report	8
6.2 Final Reports	8
6.3 Information about required work products	9
7. Oh no - We can't do the project after all!	9
8. What do we need to know about closing out our award?	9
8.1 Unused National Endowment for the Arts funds/returning funds	9
8.2 Record retention	10
9. What do we do if we are selected for an National Endowment for the Arts audit?	10
9.1 Financial management systems and internal controls	10
9.2 Documenting salaries and third-party in-kind contributions	10
10. How does our auditor get confirmation that we received an National Endowment for the Arts award?	11
Part II: COMMON CHALLENGES	
11. Cost share (recipient share, aka "match")	12
12. Federally-negotiated indirect cost rate agreements	12
13. Keeping up with SAM and DUNS	12
14. Keeping track of multiple federal awards	13
15 Accessibility	4.

Part I: BASIC AWARD ADMINISTRATION

In this first section, we will discuss several areas of federal financial assistance administration (aka "grant management"), including communicating with the National Endowment for the Arts (NEA) Grants & Contracts Office, requesting award funds, and reporting on your award.

The Grants & Contracts Office is the only office authorized on behalf of the Chairman to make awards, approve changes, and review and approve payments and reports. You may have been working with program staff on your application issues, but once an award is made, all formal grant communication and documentation must come directly to the Grants & Contracts Office. Sending material to any other office may delay the review and processing of your request.

1. How do we communicate with the Grants & Contracts Office?

Self-Service: The **Manage Your Award** section of the National Endowment for the Arts website includes rules, regulations, and policies on how to manage and administer a grant or cooperative agreement, including forms, guidance, and reporting requirements that govern your award. In addition, you can find basic information about your award using the **My Grant** feature (also known as My Grant At A Glance). Input your ten-digit grant number (e.g. 15-XXXX-XXXX) to display general information regarding your award, track payment requests, find out if Final Reports sent to the NEA have been received, and to obtain a list of your NEA grants (At this time, cooperative agreement information is not available online.)

E-mail or call us: If you have reviewed your grant information and still have a specific question, the best way to reach us is:

By e-mail to grants@arts.gov By phone at (202) 682-5403

- When calling or e-mailing, be sure to provide your ten-digit grant number (or cooperative agreement number) so we can access your award information quickly.
- If you must send us hard-copy materials or work products, please use a delivery service such as FedEx or UPS.

 U.S. Mail screening procedures can cause significant delays in delivery, as well as damage these materials.
- Unless otherwise directed, please <u>do not</u> call or e-mail a specific member of the Grants & Contracts staff. Inquiries and payment requests are routed to the first available staff member, and using the main e-mail address and telephone number helps us ensure that your questions are answered as quickly as possible.

2. What's in the award notification?

Formal notification of your award (also called the "award notice" or "grant package") includes or references the following:

- Award letter
- Approved project budget
- Reporting requirements
- General Terms & Conditions (GTCs)
- Specific terms and conditions (if applicable)

(For Cooperative Agreements, the scope of work, schedule, budget summary, reporting requirements and specific terms and conditions are contained within the agreement document.)

- READ YOUR AWARD NOTIFICATION CAREFULLY. You are responsible for understanding and complying with all of the legal, financial, and administrative policies and requirements.
- **NOTE:** The tentative funding recommendation email sent by the artistic discipline to which you applied is <u>not</u> the formal award document. Your award is not official until you receive your grant package.

2.1 Grant award letter

The grant letter contains:

- The amount of federal funds awarded.
- A brief **description** of the project we're supporting.
- The ten-digit grant number. This is the number you must provide on all grant-related communication. The
 first two digits indicate the federal fiscal year under which the award was made.
- The approved period of performance noting the project start date and end date. All approved project
 activity, whether supported with National Endowment for the Arts funds or recipient cost share (match),
 must take place within this time frame.
- CFDA Numbers (Catalog of Federal Domestic Assistance). The CFDA tracks award programs in the federal government and assigns each a specific number.
 - 45.024 Promotion of the Arts Grants to Organizations and Individuals
 - 45.025 Promotion of the Arts Partnership Agreements

What else is important to know about the award letter and the acceptance of the award?

You do not need to co-sign the award letter to accept the grant. Submission of a **Payment Request form** (officially known as a "Request for Advance or Reimbursement") constitutes your agreement to comply with all the terms and conditions of the award.

2.2 Approved project budget

The approved project budget summarizes the expenses to be supported by the National Endowment for the Arts award and the recipient cost share (matching sources). <u>All</u> costs included in this budget have been reviewed by G&C staff to ensure that they are allowable, allocable, and reasonable under the **General Terms and Conditions** for your award.

What else is important to know about our approved project budget?

- The approved project budget does not contain specific line item details. However, we may have noted the
 removal or reduction of certain line items. Common changes include the removal of pre-award costs, removal
 of unallowable cost items, adjustments to indirect cost rates, removal of ineligible match sources, etc.
- Your approved project budget is an <u>estimate</u> of the expenditures associated with your funded project. By comparison, you must report <u>actual</u>, <u>documentable expenditures</u> on future financial reports; do not simply reiterate the approved project budget.
- Keep the approved budget summary, a copy of the detailed budget you submitted to the NEA, and any updated budget information you provide to us for documentation purposes. You must be able to document all costs claimed.

2.3 Reporting requirements

Reporting requirements are included with your award notice. If you receive a hard copy of your award package this document is printed on blue paper. It outlines the progress report and final reports you are required to submit for your award. It will also provide details about a work product if one is required. (See Section 6 for more detail).

2.4 General Terms & Conditions

The **General Terms & Conditions (GTCs)** outline your responsibilities as an award recipient. The GTCs are based on federal statutes, government-wide requirements for all federal financial assistance awards, and the National Endowment for the Arts own legislation and policy.

The GTCs should be reviewed by program and financial staff at your organization. You are responsible for understanding and complying with all of the legal, financial, and administrative requirements outlined in the GTCs.

GTCs are applicable to specific federal fiscal years; be sure you are following the correct version for your award.

2.5 Specific terms and conditions (if applicable)

Some awards may also be subject to specific terms and conditions in addition to the GTCs. These may be included in your award letter or an accompanying document. Examples include terms requiring you to provide us with documentation related to:

- Historic preservation or environmental impact
- In-kind support (of allowable costs) used to meet the required match
- Expenditures, if your organization is on an alternative method of payment based on financial management deficiencies (often noted during a National Endowment for the Arts audit.)
- > Specific terms and reporting requirements (other than those pertaining to an alternative method of payment) are applicable only to the referenced award.
- If a specific term or requirement conflicts with information provided in the GTCs, the specific term takes precedence.

3. How do we get our award funds?

You must use the National Endowment for the Arts **Payment Request form** (officially known as a "Request for Advance or Reimbursement"). Submit this form in order to receive funds via ACH (Automated Clearing House) transfer. Award funds are NOT automatically disbursed, nor do we issue checks. Please read the **instructions** for completing and submitting your request carefully.

The request must be approved by an eligible authorizing official (a person who can legally bind the organization), and must include the name and contact information for a staff member who is readily available to answer questions about the request.

How often can I request funds?

When and how often you submit requests for payment is up to you; some recipients request funds in one installment while others request funds on a monthly or quarterly basis. In all cases, your requests must reflect allowable project-related expenses already incurred (a "reimbursement") and/or expenses expected to be incurred within thirty (30) calendar days from the date of the request (an "advance"). All costs must be incurred within the approved period of performance.

How will I know if you received our request for funds?

For grants, you can track the progress of your payment request by using the **My Grant** feature of our website. If you do not see a date in the "Request Received" column and it has been more than four business days since it was submitted, please resubmit the request (At this time, payment status information for cooperative agreements is not available through My Grant.)

How long does it take to get our funds?

It can take up to 30 calendar days to process your request. To help us approve your request as quickly as possible, ensure that your registration in **SAM** is current (see **Section 13**) before submitting the Payment Request, and be sure to provide a progress report, if required (see **Section 6**). The following mistakes also slow processing:

- Reimbursement requests must be based on actual, documentable expenditures corresponding to the approved project budget. Do not reiterate your approved project budget and do not include unallowable costs.
- If you are requesting payments in installments, remember that each request is cumulative. You must report project outlays including those reflected on previous requests, and also subtract any National Endowment for the Arts funds that have already been drawn down.
- If it has been more than 30 days and you have not yet received payment, first check My Grant. If we have submitted your request to the Finance Office, then check your bank account or contact your bank, if necessary. Remember to ask for confirmation of an incoming ACH transfer (not a wire transfer). If your bank confirms they have no record of the ACH transfer, e-mail grants@arts.gov and we will investigate further.
- If you are currently on an alternative method of payment, refer to the National Endowment for the Arts Inspector General's **guidance** available on our website.

Is there a deadline for requesting funds?

Funds must be requested within 90 days of the end date of the period of performance. Often recipients submit a final payment request with their final reports. See Section 8 and, in the GTCs - Section 16.

4. What if we need to make changes to our project?

You must inform us of any project changes as soon as possible and before they are implemented. Many changes require <u>prior written approval</u> from the NEA Grants & Contracts Office, and your failure to seek such approval may result in the disallowance of project costs and the need to return funds to the NEA. Requests are considered on a case-by-case basis, and approval is not guaranteed.

There is no specific form or format for requesting approval of changes, but your request should contain:

- Ten-digit grant number (or cooperative agreement number)
- A clear, concise explanation of the changes requested
- A strong justification for why the changes are needed
- Biographies or résumés of new proposed artists/participants, if any
- A revised timeline or project summary if it is changing substantially
- An updated Project Budget form if significant changes to the budget are also necessary
- Send your request to grants@arts.gov.
- Use this format in the **Subject** line of your email: Amendment Request NEA Grant # Your organization's name.
- Do not send your request to any other National Endowment for the Arts office. You can discuss potential changes with the program staff in the discipline under which your award was made, but only the Grants & Contracts Office has the authority to formally approve changes. The Grants & Contracts Office will confer with other staff as necessary.

Some situations require a combined amendment (e.g. if the project is delayed but also includes changes to the participating artists and/or budget.) The following common changes require pre-approval by the NEA Grants & Contracts Office.

4.1 Changes to the period of performance

If you need more time to complete the project activity (e.g., if a performance is postponed due to artist availability, or your project is delayed from the original timeline), you must request an extension of your period of performance (also called a "time extension.") This type of extension is common, although a request to extend the period of performance beyond four years from the original project start date is rarely approved.

Time extensions may also be requested to accommodate the completion of any required work products such as films, catalogues, etc., as all project expenditures must be incurred within the approved period of performance.

- If a time extension results in overlap with another National Endowment for the Arts award, make sure to avoid overlapping activities and/or costs (see Section 14 for more details.)
- All project activity must take place <u>during</u> the period of performance. Similarly, all expenditures must be incurred <u>during</u> the period of performance. However, you still have 90 days from the period of performance end date to complete final invoicing, draw down funds, and liquidate both the federal and required matching funds. You do not need to request an extension for this purpose.

4.2 Extensions for the submission of final reports

If your project activities are complete but you are not able to submit your final reports on time, request an extension of the reports' due date.

Generally we cannot close out your award if your project budget included an approved indirect cost based on a federally-negotiated provisional rate.

4.3 Changes to the project scope

If project activities need to change substantially, you must notify us as soon as possible. Requests for scope changes are reviewed based on the same criteria of artistic excellence and merit as were used during the review panel's discussion of your application. Be sure to provide a compelling justification for the change.

Examples include:

- Changes in <u>key participants</u> (e.g. artists and others whose participation was confirmed in your application or a previous amendment, and are central to the success of your project)
- Changes in <u>primary project activities</u> (e.g. the removal or addition of a major program component, change in format from live presentations to online activity only, or a significant change in the intended reach of the project activities)
- Changes in the <u>artistic works</u> presented, including changes in <u>content or themes</u> (e.g. from contemporary to classical works), changes in a commissioned work, or changes in locations for public art
- Changes in the <u>phase of the project</u> being supported (e.g. from research, production, and dissemination of a film to research and pre-production only)
- Changes in the scope of touring (e.g. if your multi-state tour changes to a single-state project)
- Changes in required work products (e.g. completion of a film to a working version or rough-cut)

We may require a revised budget corresponding to the changes in activity or the period of performance.

4.4 Changes to the project budget that require prior approval

Only approved expenses included in your project budget can be supported with NEA funds or matching funds. The **Project Budget form** must be used for all budget amendment requests. **Instructions** for preparing your budget are available on our website.

- Foreign travel. If you included foreign travel in your approved project budget, you do not need to do anything further. However, if you wish to <u>add</u> foreign travel to the budget (e.g., if you could not confirm the country of origin/destination at the time of application, or if you are adding a new artist who will require foreign travel), you must request <u>prior written approval</u>. In your request, be sure to identify who is traveling and the countries they are coming from/going to. Requests will not be approved for travel to/from countries sanctioned by the U.S. Treasury's Office of Foreign Assets Control; see also the specific conditions related to the Fly America Act as outlined in the GTCs.
- Equipment. If you included justification for the purchase of equipment (defined as an item valued at \$5,000 or more per unit, with a useful life of more than one year) in your application and approved project budget, you do not need to do anything further. However, if you want to add the purchase of equipment that exceeds the \$5,000 threshold to your budget, you must request prior written approval. Your request must identify what item is being purchased, the unit cost, and provide a strong justification of the necessity of the purchase and its relation to your project.
- <u>Indirect costs</u>. If you wish to <u>add</u> indirect costs to your approved project budget (based on a predetermined or final rate applicable to the award period), you must provide a copy of the current indirect cost rate agreement along with a revised budget form. (See more information about indirect costs in Section 12.)

4.5 Changes to the project that do not require prior approval

- Changes in costs among the approved budget items, as long as you are still meeting the 1:1 cost share/match.
- Changes in artists who were listed as "proposed" or "to be invited." These artists may be replaced with artists of similar caliber without NEA approval. (Artists noted in your application or subsequent amendments are presumed to be confirmed, unless you have indicated otherwise.)
- Changes to artist line ups for festivals, for example, where there are dozens of artists and arts groups
 participating. *However*, if an artist is key to the festival/a headliner that was identified specifically in the
 application, then a scope change would need to be submitted per 4.3).
- Changes in project venues, as long as the new venue is comparable in reach, meets all accessibility requirements, and does not fall under 4.3 or 4.4.
- Changes to project activity dates that fall within the approved period of performance.
- Changes to the title of a work or event (e.g. from a working title to a final title).
- The removal of indirect costs, if it does not impact the required match amount.
- It can be difficult to determine if a change requires a formal amendment or not. If you are unsure, email us at **grants@arts.gov**, so that we can review your grant file in more detail.

5. How should we acknowledge support from the National Endowment for the Arts?

The **GTCs** provide this guidance. In addition, please consult our **Working with the Media Toolkit.** All **logo files** are available on our website.

6. What reports do we need to submit for our award?

As noted in **Section 2.3**, a Reporting Requirement overview document is included with your award notice. These requirements are further detailed below.

6.1 Progress report

A progress report is required once your cumulative payment requests exceed 2/3 of the total award amount. For example, if your award is \$20,000, you must submit a progress report when your cumulative payment requests exceed \$13,333.

Your progress report is submitted on the **Payment Request form** . It should provide a quick update on approved project activities completed to date, and a summary of activity still to be conducted.

If you are submitting your Payment Request form in conjunction with your Final Descriptive Report, you can simply indicate "See Final Descriptive Report" in the "Progress Report" section of the payment form.

6.2 Final Reports

Final reports are due no later than 90 days after the period of performance end date. You may complete invoicing, request an NEA reimbursement, and liquidate the federal and matching funds during this time.

Components of the final report package include:

- A Final Descriptive Report (FDR). This three-part report requests a narrative and statistics about your award
 activities. You'll also submit information about the locations of project activity in the GEO section on our
 website.
- A Federal Financial Report (FFR)
- A work product, if required. (This requirement will be noted on the Reporting Requirements document in your award notice, if applicable, or, for cooperative agreements, your agreement document will specify any required items.)

6.2.a Which FDR should I use?

The Final Descriptive Report forms may change from year to year. Be sure to follow the link corresponding to the fiscal year of your award number at www.arts.gov/manageaward.

- Different project outcomes require different Final Descriptive Report forms. The outcome associated with your award is on your award document and, for grants, is visible on My Grant.
- Final report materials (except for the GEO) must be e-mailed to finalreports@arts.gov.

6.2.b Additional reporting tips

- If you have completed all project activity <u>and</u> expended all NEA and required cost share/matching funds, feel free to submit your final reports early.
- If you need more time to submit your final reports, you must request an extension of the final reports due date. See Section 4.2 for more information.

- Final reports must <u>not</u> include activities or expenditures that are not consistent with the approved project or budget. If there have been substantial changes to your project review Section 4 about amendments.
- The amount you show on your Federal Financial Report in box 10j (recipient cost share) plus the NEA award funds in box 10e must equal the total actual, allowable expenditures. Generally, we would not expect the expenditures reported on your FFR to match your original project budget to the dollar, since your project budget includes estimates of costs. We may contact you for clarification.
- Failure to submit all required components of the final report package by the due date will cause you to be ineligible to receive new awards and/or payments until all delinquent material is received.
- Some awards may have additional reporting requirements, which may be required at interim times during the period of performance, or with the final report package. If applicable, your award notice will include this information.

6.3 Information about required work products

If your award supported the production of a physical publication (catalogue, journal, commissioned score, books, etc.), an audio/visual work (film/video, CD, etc.), assessment tools, research reports, or any other specific product as identified in the application narrative and budget, a work product may be required. Although you can check **My Grant**, your Reporting Requirements document provides more detail. If no product was specified, you do not need to submit any additional materials. For cooperative agreements, your agreement document will specify any required items.

→ U.S. Postal Service (USPS) screening procedures cause delays in delivery, as well as damage to publications, media materials, or other work products. Any required hard copy materials should be sent via alternative delivery service.

7. Oh no - We can't do the project after all!

You may decline the award if you are unable to carry out the activities for which you received National Endowment for the Arts funding. Submit your intention in an email message to **grants@arts.gov**; using the **Subject** line: "Declining NEA Grant # - Your organization's name" and include the following:

- Ten-digit grant number.
- An explanation for why the award is being declined.
- If you have not drawn down any funds, no additional action is required.
- If you drew down grant funds, you must return them (see **Section 8.1**).

Please note: there is no penalty to the organization if you voluntarily decline the award.

8. What do we need to know about closing out our award?

Generally, after your final reports have been accepted by Grants & Contracts staff, your award is closed. However, please note the following:

8.1 Unused National Endowment for the Arts funds/returning funds

Any federal funds that you have not requested from us within 90 days of the period of performance end date may be de-obligated by the NEA. The funds will no longer be available.

NEA funds CANNOT be rolled over for use on future programs that were not part of the specific grant, even
if it's for similar activity.

- If you drew down all your NEA funds but did not meet the cost share/matching requirement, generally we will require you to return any unmatched funds. Unless otherwise noted in your award document, the NEA can only support up to 50% of the project's total allowable costs (up to the NEA award amount).
- If you will not be requesting any remaining NEA funds, simply indicate that on your Federal Financial Report (box 12). Even if you do not indicate such, we will de-obligate the funds as noted above.
- To return funds, send a check payable to the National Endowment for the Arts to:

National Endowment for the Arts Attn: Grants & Contracts Office 400 7th Street SW Washington, DC 20506.

Don't forget to include your ten-digit grant number or your cooperative agreement number on the check memo or a cover sheet.

8.2 Record retention

Records must be retained for three years from the date of submission of the award's final Federal Financial Report. Review the **General Terms & Conditions (GTCs)** for more information about record retention and access to your records.

9. What do we do if we are selected for a National Endowment for the Arts audit?

As a recipient of NEA funds, you may be chosen to undergo an audit or other special review by the NEA's Office of Inspector General (OIG). The OIG evaluates a number of recipients each year for compliance with federal financial assistance regulations and requirements. If you are selected, the OIG will reach out to request documentation and schedule a site visit. Results of past audits and other reviews are available on the OIG section of our website.

9.1 Financial management systems and internal controls

One of the most common audit findings is that an organization lacks adequate systems to support the tracking and management of Federal funds and activities, or that they do not have written policies and procedures that meet federal requirements.

Federal regulations frequently refer to an organization's <u>written</u> procedures (for hiring, travel, procurement, etc.) Be sure yours are written down!

If your financial and management systems and documentation can't support how the federal and matching funds were used for the approved project, you may be required to return funds to us.

9.2 Documenting salaries and third-party in-kind contributions

All salaries charged to a federal award must be properly documented. This can be done through your accounting/payroll systems and/or through the maintenance of Personnel Activity Reports (see a sample on our website.) Also note:

- Third-party in-kind contributions must be properly documented, and include confirmation of the fair market value of the goods or services provided (see a sample on our website under "Forms and Instructions.")
- If you are unable or unwilling to comply with the documentation requirements as referenced in the GTCs, you may not want to include these costs in your project budget if you do not need them to meet the required minimum match.

10. How does our auditor get confirmation that we received a National Endowment for the Arts award and/or funds have been paid?

If you require confirmation of award information for your own audit purposes, contact the NEA Finance Office. Be sure to include:

- Your organization's legal name.
- Your ten-digit grant number or cooperative agreement number.
- The specific information your auditor requires, e.g., amount of award, date of payment(s), etc.
- E-mail your request to **neafinance@arts.gov**, using the subject line "**CPA Audit Confirmation Request**." If you have questions call (202) 682-5491.
- The biggest mistake an organization can make when requesting an audit confirmation is <u>not</u> including the grant or cooperative agreement number(s).
- Do not send your audit confirmation request via U.S. Postal Service, as screening procedures cause delays and damage to mailed materials.

Part II: COMMON CHALLENGES

The following list includes common issues faced by National Endowment for the Arts recipients. This is not an exhaustive list; if you have specific questions, please feel free to **contact us** at **grants@arts.gov**.

11. Cost share (aka "Match")

Unless specified in your award notice, all National Endowment for the Arts grants require a recipient cost share equal to the amount of the NEA award. Your NEA grant must be matched 1:1 or "dollar for dollar." The **General Terms & Conditions (GTCs)** outline allowable match sources; <u>please read this information carefully</u>.

- Matching funds that support approved project costs must be documented in your financial systems.
- Matching resources, whether cash or in-kind, must be available for the approved project during the period of performance.
- All third-party, in-kind items used to meet the match must be included as costs in the approved project and properly documented.
- You do not need to request approval for changes in match sources (e.g. use of donations versus ticket income, or replacement of in-kind contributions with cash match), as long as they are from allowable sources and properly documented.
- You <u>cannot</u> include funds from other federal sources as part of your match, nor can the costs covered by those funds be included in financial reports for your award. This includes federal funds that are subgranted by your State Arts Agency or a Regional Arts Organization, as well as funds from entities that flow-through federal funds to you.

12. Federally-negotiated indirect cost rate agreements

Most National Endowment for the Arts award recipients do not need a federally-negotiated indirect cost rate agreement (ICRA, also called a Facilities & Administration rate.) The process for obtaining one is lengthy, and generally, obtaining an indirect cost rate is more beneficial to large entities (such as colleges and universities) that receive numerous federal awards each year.

Organizations that don't want to go through the process of obtaining a negotiated indirect cost rate should note:

- Including indirect costs in your NEA project budget is never mandatory. If you don't have a federally-negotiated agreement, "administrative overhead" is acceptable as an allowable direct cost item.
- Starting with FY15 awards, an organization that has <u>never</u> received a federally-negotiated indirect cost rate
 agreement may charge a "de minimis" rate of 10% on modified total direct costs. Note: if you wish to
 charge the de minimis rate to your award, you must have included it on your approved project budget.
- X You cannot claim both overhead/administrative costs and an indirect or de minimis cost rate.
- If you need indirect costs to meet the award's minimum required match, generally you must have a final rate for the period of performance. See Section 4.2.

13. Keeping up with SAM and DUNS

As an applicant for federal funding, you already secured a unique entity identification number (your **DUNS**) and registered in **SAM** (the System for Award Management). Together, these systems provide basic data about your organization and help the National Endowment for the Arts verify your eligibility to receive grant funds.

System for Award Management (SAM)

Your entity must have an active registration in **SAM** throughout the life of your award. Payments cannot be made and we cannot issue new awards if your SAM registration is expired. Remember:

- There are two steps to the SAM registration process: an individual user registration (creating your own user ID and password for access) <u>and</u> an entity registration. It is the <u>entity</u> registration that must be updated annually. Registration and updating is FREE, and you should only use the official website at <u>sam.gov</u> to manage your account.
- To check your SAM status, go to sam.gov and enter your DUNS in the search field.
- Creating or updating your personal user information such as your password or e-mail address does <u>not</u> update the entity's record.
- For help, visit the Federal Service Desk at fsd.gov or call 866-606-8220 (Monday Friday 8 a.m. to 8 p.m. ET).
- If SAM.gov flags your organization with delinquent federal debt, the National Endowment for the Arts cannot make new awards or release award funds. Resolving federal debt can take time, so you must work to address it as soon as you become aware of the debt. To determine the source of the reported debt, contact the Federal Management Service at 800-304-3107.
- September 1 is the cut-off date by which an applicant must have resolved their federal debt status, in writing, to receive a new NEA award in that fiscal year.

Dun & Bradstreet (D&B) Data Universal Numbering System, aka DUNS number

Your DUNS record doesn't require annual updates, but you should check it periodically to verify that your information is correct. To check, go to the **D&B website**. Organizations may have more than one DUNS number, as a separate registration is required for each business location; however you must use the same DUNS you used on your NEA application on all subsequent required reports. *For help, call 866-705-5711 or e-mail govt@dnb.com*.

Please remember:

- The NEA has read-only access to the SAM and D&B databases and cannot retrieve lost passwords.
- Be sure to keep your entity's information updated in <u>both</u> systems (especially your points of contact and their e-mail addresses).
- If your address has changed, you must change it first with DUNS; SAM will retrieve the new information within a few days.

14. Keeping track of multiple Federal awards

If your organization receives more than one federal award (either from the National Endowment for the Arts or from other federal agencies, such as the National Endowment for the Humanities, Institute of Museum and Library Services, U.S. Department of Education, or through entities that award federal funds such as Corporation for Public Broadcasting), you must take extra caution to ensure that you properly manage and document the use of these funds.

There can be NO overlapping project costs with other federal awards, whether from the NEA or another federal agency.

You also need to be aware of federal funds that flow to you through a subgrant or subcontract from another non-federal entity. This includes funds from State Arts Agencies or Regional Arts Organizations, among others.

One way to avoid overlap is to have separate periods of performance for each award. However, you may have overlapping periods of performance as long as the federal awards support distinctly <u>different</u> projects with different expenditures, and you must be able to adequately allocate and document charges for each separate award.

- Costs that have been charged to an earlier award cannot be included in the project budget for a subsequent award. For example, if one award is to support a commission of a work and another award is to support its eventual performance and recording, commissioning fees that are included in the budget for the first award cannot also be included in the second award.
- A common problem is having staff or contractor salaries or fees charged to more than one award during overlapping periods of time. Check to make sure the same individual's time is never charged at more than 100% in total during any given time segment.

15. Accessibility

<u>All</u> project activities that are supported with National Endowment for the Arts or matching funds must be fully accessible to people with disabilities in compliance with Section 504 and the ADA. This includes <u>physical</u> accessibility (e.g. wheelchair accessibility) of **all** locations where project activity takes place, including offices as well as spaces for performances, workshops, classes, meetings, lectures, etc. If your award is for an artist residency program, you must ensure that accessible living accommodations and studio spaces are available. This requirement also includes <u>programmatic</u> accessibility in the form of sign-language interpretation, audio description, large print/Braille programs, etc.

Accessibility requirements also apply to all publications, films, broadcasts, and online media projects that are supported by NEA or matching funds.

Costs of accommodations such as sign-language interpretation and large print programs are allowable project expenditures; however, the costs of accessibility-related construction (building of permanent ramps, etc.) cannot be supported with NEA or matching funds.

- There are many resources on our website to help you comply with the accessibility requirements of your award. See the **Accessibility** section of the site for more detail.
- You are <u>required</u> to have a **Section 504 self-evaluation Workbook** or a comparable document on file. Failure to maintain this required documentation is one of the most frequent audit findings reported by the NEA Office of Inspector General. You should work with the staff at your organization to be sure the 504 self-evaluation is completed and updated as needed.
- You should clearly advertise where and how a program participant can request any necessary accessibility accommodations. Your website is a great place to do this, but you should also include this information in advertising/promotional materials, in application information (if your project invites people to apply for residencies or other activities), and in other communications.
- Although venues such as churches or other historic properties may themselves be exempt from certain accessibility provisions, you, as the recipient of a federal award, must ensure that NO federal or matching funds are used to support activities at inaccessible locations.

We hope this information is helpful to you in managing your National Endowment for the Arts award. Remember, this handbook is NOT a substitute for your thorough review and understanding of the **General Terms and Conditions** for your award.

Please feel free to contact us at grants@arts.gov or call us at (202) 682-5403 with any questions or concerns.