



**National
Endowment
for the Arts**
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HOW TO MANAGE YOUR NEA AWARD

HANDBOOK FOR RECIPIENTS OF GRANTS AND COOPERATIVE AGREEMENTS TO ORGANIZATIONS

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Grants & Contracts Office

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The *How to Manage Your NEA Award Handbook* (the "Handbook") is a companion piece to other NEA award materials, including, but not limited to, the General Terms & Conditions, payment and reporting forms, and associated instructions.

It is not intended as a substitute for these documents; in fact, you should read the 2015 General Terms & Conditions first, and then refer to this Handbook and specific instructions as needed.

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

TABLE OF CONTENTS

Part I: BASIC AWARD ADMINISTRATION

1. How do we communicate with the Grants & Contracts Office?	1
2. What's in our award notification?	1
2.1 Award letter	2
2.2 Approved project budget	2
2.3 Reporting requirements	2
2.4 General Terms & Conditions	2
2.5 Specific terms and conditions (if applicable).....	3
3. How do we get our award funds?	3
4. What if we need to make changes to our project?	4
4.1 Changes to the period of performance	5
4.2 Extensions for the submission of final reports.....	5
4.3 Changes to the project scope.....	5
4.4 Changes to the project budget.....	6
4.5 Changes not subject to NEA approval	6
5. How should we acknowledge the NEA's support?	7
6. What reports do we need to submit for our award?	7
6.1 Progress report.....	7
6.3 Final Reports	7
6.4 Information about required work products.....	8
7. How do we decline an award?	8
8. What do we need to know about closing out our award?.....	9
8.1 Unused NEA funds/returning funds	9
8.2 Record retention	9
9. What do we do if we are selected for an NEA audit?	9
9.1 Financial management systems and internal controls.....	9
9.2 Documenting salaries and in-kind.....	9
10. How does our auditor get confirmation that we received an NEA award?.....	10

Part II: COMMON CHALLENGES

11. Cost share (aka "match")	11
12. Federally-negotiated indirect cost rate agreements	11
13. Keeping up with SAM and DUNS	11
14. Keeping track of multiple Federal awards.....	12
15. Accessibility.....	13

Part I: BASIC AWARD ADMINISTRATION

Upon receiving your award notice, many award recipients (also known as "grantees" or simply "recipients") aren't sure where to turn next. In this first section, we will discuss several areas of award administration (aka "grant management"), including communicating with the Grants & Contracts Office, requesting award funds, and reporting on your award.

First and foremost, please note that only the Grants & Contracts Office has the authority to make awards, approve changes, and review and approve payments and reports. You may have issues that you wish to discuss with the program staff in the discipline under which your award was made (including seeking panel feedback or discussing future applications) but once an award is made, all formal grant communication and documentation must come 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?

The NEA Grants & Contracts staff is available to assist you with all aspects of managing your award. However, this Handbook will provide answers to many commonly asked questions; we strongly encourage you to review this information in its entirety before contacting us.

Self-Service: You can easily find basic information about your award using the **My Grant** feature of our Web site. Just input your ten-digit grant number (e.g. 15-XXXX-XXXX) and you can view information including pending and past payment requests, report due dates, and more. *(At this time, cooperative agreement information is not available online.)*

E-mail or call us: If you have reviewed this information and still have a specific question, or need to communicate a change of address, personnel, or legal organization name, 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.
- ✗ Unless otherwise directed, please do not 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.
- ✗ Do not send correspondence or other materials to us via U.S. Mail, as screening procedures can cause significant delays in delivery, as well as damage publications, media materials, or other work products.

2. What's in our 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**
- Specific terms and conditions (if applicable)

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

- ➔ **READ YOUR AWARD DOCUMENTATION CAREFULLY.** You are responsible for understanding and complying with all of the legal, financial, and administrative policies and requirements.

2.1 Award letter

The award letter is issued to you unilaterally. That is, you do not have to sign anything at this time, or return it to us. The letter contains basic information about your grant, such as:

- 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 approved **period of performance** (formerly called the "period of support"), which includes the start date and end date. All approved project activity, whether supported with NEA funds or by any required match, must take place within this time frame.

2.2 Approved project budget

Included in the award notice is a summary of the approved project budget, which reflects both the expenses to be supported by the NEA award and those to be funded by matching sources. All costs included in this approved project budget must be allowable under the **General Terms and Conditions** for your award.

What's important for you to know about your approved project budget?

The Grants & Contracts staff has reviewed your budget carefully, and 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.

The approved project budget included in your award notice does not contain specific line item details. Along with this budget, you should retain a copy of the budget you submitted to the Arts Endowment with your application, or any updated budget information that was provided to us, for documentation purposes.

- ➔ Your approved project budget is an estimate of the expenditures associated with your funded project. Remember, on all future payment requests and financial reports, you must report actual, documentable expenditures. Do not simply reiterate the approved project budget.
- ➔ You are responsible for ensuring that no unallowable costs are reflected on payment requests or financial reports for your award.

2.3 Reporting requirements

Generally, a blue reporting requirement overview document is included with your award notification. You are required to submit progress and final reports for your award as described here. (See **Section 6** for more detail).

2.4 General Terms & Conditions

The **General Terms & Conditions** (GTCs), found on our Web site, 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 NEA's own legislation and policy.

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

- ➔ 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 providing us with documentation:

- related to historic preservation or environmental impact,
 - of in-kind support (of allowable costs) used to meet the required match,
 - related to expenditures, if your organization is on an alternative method of funding based on financial management deficiencies (often noted during an NEA audit.)
- ➔ Specific terms and reporting requirements (other than those pertaining to an alternative method of funding) are applicable only to the referenced award; past or future awards are not subject to these conditions unless noted in the relevant award document or amendment.
 - ➔ If a specific term or requirement conflicts with information provided in the GTCs, the specific term will take precedence.

3. How do we get our award funds?

How do we get our award funds? is often the first thing a recipient asks. Here's what you need to know:

Award funds are NOT automatically disbursed. You must submit a **Payment Request** in order to receive funds via ACH transfer. We do not issue checks. Please read the **instructions** for completing and submitting your request carefully; a short **video tutorial** is also available on our Web site at arts.gov/manageaward.

You must use the NEA's **Payment Request form** (officially known as a "Request for Advance or Reimbursement"), not a generic SF-270 or other invoice, as our form includes specific labor assurances applicable to all NEA awards, as well as space to provide the required bank account information. The request must be submitted by an eligible authorizing official, and you should include the name and contact information for a staff member who is readily available to answer questions about the request.

Other common questions include:

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 using the **My Grant** feature of our Web site. Simply input your ten-digit grant number to confirm that a request has been received, and to see the date the Grants & Contracts Office has approved/forwarded it to our Finance Office for payment. This is the best way to track receipt and status of a request.

If you do not see a request marked as "received" and it has been more than four business days since it was sent, please resend it. *(At this time, payment status information for cooperative agreements is not available online.)*

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, we recommend that you check that your registration in **SAM** is current (see **Section 13**) before submitting, and be sure to provide a progress report, if required (see **Section 6**). The following mistakes also slow processing.

- ➔ Requests must be based on actual, documentable expenditures corresponding to the approved project budget. Do not simply reiterate your approved project budget, and do not include unallowable costs.
- ➔ If you are requesting payments in installments, remember each request is cumulative. You must report project outlays including those reflected on previous requests, and also subtract any Arts Endowment 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 and 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 us and we will investigate further.
- ➔ If you are currently on an alternative method of funding (this is a specific term that would be included on your award letter), refer to the NEA's Inspector General's **guidance** available on our Web site.

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

If changes are needed to your project, you must inform us as soon as possible, before implementation of any changes. Many changes require prior written approval from the NEA, and your failure to seek such approval may result in the disallowance of project costs and the need to return funds. Note that requests are generally reviewed within 30 calendar days. 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:

- Your 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 resumés of new proposed artists/participants, if any
 - A revised timeline or project summary, if it is changing substantially
 - A **Revised Project Budget form**, if significant changes to the budget are also necessary
- ➔ Send your request to **grants@arts.gov**.
 - ➔ In the **Subject** line, include your award number and note that this is an amendment request.
 - ➔ Do not send your request to any other NEA 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.

Various types of changes are outlined below, and your situation may require a combined amendment (e.g. if the project is delayed but also includes changes to the participating artists and/or budget.)

4.1 Changes to the period of performance

If you need more time to complete the project activity (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.") These types of extensions are 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 NEA award, make sure to avoid overlapping activities and/or costs. (See **Section 14** for more details.)
- ➔ Although all project activity must take place, and expenditures incurred during the period of performance, 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 the period of performance has ended with the successful completion of all project activity, but you are unable to submit the required final reports within 90 days, you may request an extension of the final reports due date.

As a reminder, you cannot close out an award based on a provisional indirect cost rate agreement. If you need more time to obtain a final indirect cost rate for the award period, you may need to request a reporting extension. (See **Section 12** for more details.)

4.3 Changes to the project scope

You must carry out your project in a manner that is consistent with what has been previously reviewed and approved by the NEA. If project activities change substantially, it is considered a change of project scope, which requires NEA approval in advance of any new/changed activity. Examples include:

- Changes in key participants (e.g. artists and others whose confirmed participation was central to the success of your project)
 - Changes in primary project activities (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 artistic works presented, including changes in content or themes (e.g. from contemporary to classical works), or changes in a commissioned work
 - Changes in the phase of the project 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)
- ➔ If a change in artist is necessary due to illness, or an activity must be cancelled due to extreme weather or other unforeseen circumstances, we ask that you contact us as soon as possible regarding the change.

- ➔ Requests for scope changes are reviewed based on the same criteria of artistic excellence and merit as were used during the panel's discussion of your application. Be sure to provide a compelling justification for the change.
- ➔ If you are requesting a major change of project scope or significantly changing the period of performance (e.g., reducing it from two years to one) we may require a revised budget corresponding to the changes in activity.

4.4 Changes to the project budget

Only expenses that were approved as part of your project budget can be supported with NEA or matching funds. The **Revised Project Budget form** must be used for all budget amendment requests. **Instructions** for preparing your budget are available on our Web site.

The following budget changes always require prior NEA approval:

Foreign travel. If you included foreign travel (listed by country) in your approved project budget, you do not need to do anything further. However, if you wish to add 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 prior written approval. 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 Asset 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.

Indirect costs. If you wish to add 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 10**.)

4.5 Changes not subject to NEA approval

Certain changes are NOT subject to NEA approval, including:

- Changes among the approved budget lines, as long as you are still meeting the 1:1 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 **4.4b**.
 - 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 sometimes be tricky to determine if a change requires a formal amendment or not. If you are unsure, just send a message to **grants@arts.gov**, so that we can review your grant file in more detail.

5. How should we acknowledge the NEA's support?

As outlined in the GTCs, we require that you acknowledge the NEA's support for your project. Please follow the guidelines provided for various forms of media/publications. All **logo files** are available on our Web site. For additional guidance, please consult our **Working with the Media Toolkit**.

Information about **grants awarded** since 1998 is also provided on our Web site. If you note substantive inaccuracies in your project description, please contact us at **grants@arts.gov**.

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

As noted in **Section 2**, a blue Reporting Requirement overview document is generally included with your grant award notification. These requirements are further detailed below.

6.1 Progress report

When: A progress report is tied to receiving NEA funds. It is required once your cumulative payment requests exceed 2/3 of the total award amount. This means, if you have received an award of \$20,000, you must submit a progress report at the point that your cumulative payment requests exceed \$13,333.

Progress reports are intended to be completed on the **Payment Request form**; do not attach extra pages unless necessary. They should provide a quick update on approved project activities completed to date (since the start of the period of performance), 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 form.

6.3 Final Reports

When: Final reports are due no later than 90 days after the period of performance end date. All project activities must be completed, and expenditures must be incurred within the period of performance. However, you do have this 90-day period to complete final invoicing, draw down NEA funds, and liquidate the Federal and matching funds.

Components of the final report package include:

- A **Final Descriptive Report (FDR)**. This report includes narrative about the performance of your award activities, as well as statistics and information about locations of major activities.
- A **Federal Financial Report (FFR)**.
- A **work product**, if required.

- ➔ The Final Report forms, instructions, and tips for completing and submitting each report, are found at **www.arts.gov/manageaward**. Final report materials must be e-mailed to **finalreports@arts.gov**.

In addition:

- If you have completed all project activity and expended all NEA and required matching funds, you can 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 should not include activities or expenditures that are not consistent with the approved project or budget. If there have been substantial changes to your project, review the information in **Section 4** about amendments.
 - Generally, we would not expect that the expenditures reported on your FFR could match your original project budget to the dollar, since it has often been more than a year since you gave us your estimated budget. We may contact you for clarification if necessary.
 - 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.
- ➔ The Final Descriptive Report forms may change from year to year. Be sure to follow the link corresponding to your award number.
 - ➔ Check the outcome associated with your award (see your award document or **My Grant**). Different outcomes require different report forms.
 - ➔ Our Town awards use the Livability FDR form; be sure to visit the Manage Your Award **Our Town** page for instructions.
 - ➔ Some awards may have additional reporting requirements; see your award notice for details.

6.4 Information about required work products

If your award supported the production of a physical publication (catalogue, journal, commissioned score, etc.), an audio/visual work (film/video, CD, etc.), or any other specific product as identified in the application narrative and budget, a work product may be required. See your award letter for details and/or the blue Reporting Requirements overview document included in the award notice. Some grant programs may specify additional reporting requirements (such as assessment tools or research reports). 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.

- ✘ As a reminder, 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. How do we decline an award?

If you are unable to carry out the activities for which you received NEA funding, you can decline the award. There is no specific form or format for declining an award, but your request should contain the following information:

- Your ten-digit grant number or cooperative agreement 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 7.1**).
- ➔ E-mail your message to **grants@arts.gov**.
 - ➔ Include your award number and an indication that you are declining your award in the Subject line.

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

Most of the time, once you have submitted your final reports and they have been reviewed/accepted by the Grants & Contracts staff, your award is considered closed. However, please note the following items:

8.1 Unused NEA funds/returning funds

Any Federal funds that remain unliquidated (unpaid) after the 90-day period may be deobligated by the NEA.

- NEA award funds CANNOT be rolled over for use on other future programs, even if it's for similar activity.
- If you have received all your NEA funds but not met the matching requirement, you will be required to return any unmatched funds.

- ➔ If you will not be requesting funds, simply indicate that on your Federal Financial Report.
- ➔ To return funds, send a check (payable to the NEA) to: National Endowment for the Arts, Attn: Grants & Contracts Office, 400 7th Street SW, Washington, DC 20506.
- ➔ Include your ten-digit grant number/cooperative agreement number on the check memo or a cover sheet.

8.2 Record retention

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

9. What do we do if we are selected for an NEA 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 for an audit, the OIG will reach out to request documentation and schedule a site visit. Results of past audits and other reviews are available on our Web site.

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 written procedures (for hiring, travel, procurement, etc.) Be sure yours are written down!

9.2 Documenting salaries and in-kind

All salaries charged, in whole or in part, 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 **Web site**.) Also note:

- 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 Web site.)
- 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 your systems and documentation can't support what happened with the Federal and matching funds, you may be required to return funds to the agency, and we may, if necessary, take action to terminate your award and/or suspend or debar your organization.

10. How does our auditor get confirmation that we received an NEA award?

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) 682-5016.
 - ✗ 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

Managing a Federal award can be challenging, especially for first-time recipients or for new staff. The following are some of the most common issues that NEA recipients may face. This is not an exhaustive list; if you have specific questions, please feel free to **contact us**.

11. Cost share (aka "match")

Unless specified in your award notice, all NEA grants must be matched 1:1, or "dollar for dollar." The GTCs outline allowable match sources; please read this information carefully.

Important things to remember are:

- Matching funds that support approved project costs must be documented (allocated) in your financial systems.
 - Matching resources, whether cash or in-kind, must be available for use and allocated to the approved project during the period of performance.
 - All in-kind items used to meet the match must be allocable to 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.
- ✘ Remember, you cannot 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.

12. Federally-negotiated indirect cost rate agreements

Most NEA award recipients do not need a Federally-negotiated indirect cost rate agreement (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 who don't wish 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 never 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 minimus rate to your award, you must have included it on your approved project budget.
- ✘ You cannot claim both overhead/administrative costs and an indirect/de minimis rate.

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 NEA 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 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) and an entity registration. It is the entity registration that must be updated annually. Registration and updating is FREE, and you should only use the official Web site at **sam.gov** 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 not update the entity's record.
 - *For help, visit the Federal Service Desk at **fsd.gov** or call 866-606-8220.*
- ✘ The NEA cannot make new awards, or issue payments to organizations whose registration in SAM identifies them as having delinquent Federal debt. Resolving these issues can take time, so you must work to address it as soon as you can. Once you are on a repayment plan, and can show evidence of making payments, we can support your award. To determine the source of the reported debt, contact the Federal Management Service at 800-304-3107.

DUNS

Your DUNS (Dun & Bradstreet) record doesn't require annual updates, but you need to make sure it reflects any changes to your organization's legal name or address. To check, go to the **D&B Web site**. Organizations may have more than one DUNS, as a separate registration is required for each business location; you must use the same DUNS as you used to apply for NEA funding. *For help, call 866-705-5711 or e-mail **govt@dnb.com**.*

Please remember:

- The NEA has no access to the SAM or DUNS systems and cannot retrieve lost passwords.
- Be sure to keep your entity's information updated in both systems (especially your points of contact and their e-mail addresses).
- If your address has changed, you must change it first with DUNS; the information will then pre-populate to SAM.

14. Keeping track of multiple Federal awards

If your organization receives more than one Federal award (either from the NEA or from other Federal agencies, including the National Endowment for the Humanities, U.S. Department of Education, Corporation for Public Broadcasting, etc.), you must take extra caution to ensure that you properly manage and document the use of Federal 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 as 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. However, you may have overlapping periods of performance as long as the Federal awards support different 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 salaries or contractors 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

All project activities that are supported with NEA or matching funds must be fully accessible to people with disabilities in compliance with Section 504 and the ADA. This includes physical 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 a residency program, you must ensure that accessible living accommodations are available.) This also includes programmatic 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.

- There are many resources on our Web site to help you ensure compliance with the accessibility requirements of your award. See the **Accessibility** section of the site for more detail.
- Note that NEA grantees are required 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 Workbook 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.
- ✘ 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 ramps, etc.) cannot be supported with NEA or matching funds.

We hope this information is helpful to you in managing your NEA award. Remember, this handbook is NOT a substitute for your thorough review and understanding of the **GTCs** 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.