

# Executive Summary

## Equity Action Plan of The National Endowment for the Arts (NEA)

### BACKGROUND

The NEA, established by Congress in 1965, is an independent federal agency that is the largest funder of the arts and arts education in communities nationwide and a catalyst of public and private support for the arts. The NEA fosters and sustains an environment in which the arts benefit everyone in the United States. The NEA's primary activities include grantmaking to nonprofit arts organizations, public arts agencies and organizations, and individual writers and translators. The NEA also conducts research on the value and impact of the arts in order to share that information with stakeholders and the public.

The NEA is committed to supporting equitable opportunities for arts participation and practice for all Americans in the United States. This commitment is reflected in the NEA's equity action plan, which is in alignment with the 2022-2026 agency strategic plan. Activities described in this equity action plan include:

- **Arts Participation in Underserved Communities**
- **Community Engagement**
- **Accessibility**
- **Data**
- **Contracting and Procurement**

### Methodology

Since the 90-Day Report was submitted in April 2021 and the 200-Day Assessment submitted in August 2021, the NEA has worked to develop the following strategies to increase equity in the aforementioned actions that advance and support Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government:

- Address and reduce the gap between availability of arts programming and the participation of underserved groups.
- Expand engagement with underserved communities through webinars and key partner organizations.
- Develop concrete policies and procedures for providing access accommodations for persons with disabilities and limited English proficiency.
- Determine feasibility of expanding demographic data collection related to grant beneficiaries, staff, and leadership of grant recipient organizations.
- Increase awareness of contract and procurement opportunities to HUBZone and other underrepresented groups.

In addition, these actions support the cross-cutting objective identified in the NEA's 2022-2026 strategic plan, which states: *The NEA will model diversity, equity, inclusion, and accessibility in the arts through all its activities and operations.*

### CONCLUSION

The NEA is making a significant impact across the country with its grantmaking, contracting and procurement activities. The NEA will continue to work tirelessly to remove barriers and ensure that award opportunities and dollars are distributed more equitably.

## Summary of Early Accomplishments

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Since January 20, 2021, the NEA has made strides in advancing equity. These efforts came to the forefront with the agency's administration of the American Rescue Plan (ARP). With this program, in a first for the agency, the NEA's grant application guidelines were translated into Spanish and Chinese. Similarly, technical assistance videos, guideline webinars, and twice-weekly Zoom sessions with Q&A for applicants included captioning and options in Spanish and American Sign Language.

In addition, the agency encouraged ARP grant applications from organizations applying to the NEA for the first time. This practice departed from the NEA's method of administering two earlier stimulus grant programs—ARRA (American Recovery and Reinvestment Act of 2009) and CARES (Coronavirus Aid, Relief, and Economic Security Act)—which limited eligibility to previous grantees. With ARP, the agency engaged culturally and geographically-specific communities so that the broadest possible constituency became aware of the new funding opportunity. As a result of these efforts, 18% of the ARP grantees (including the NEA's programs for subgranting and direct grants) were new applicants to the agency; 27% are new grantees to the agency; 28% of grantee organizations had annual budgets of \$250,000 or less; 20% were located in non-metro areas; 42% were in high-poverty areas; and 70% had not received any other type of federal grant in the last 10 years.

The NEA also uses multiple platforms to amplify the stories and narratives from its grantees and from communities and cultural practices around the country. The NEA's first 2021 issue of *American Artscape* magazine featured organizations serving African American artists and communities, and profiled the African American artistic experience. The second issue of the magazine featured stories of Asian American, Native Hawaiian, and Pacific Islander communities. In 2022, the third issue will feature Native artists and arts organizations and the fourth issue will feature Hispanic arts organizations and artists.

The NEA also has ongoing initiatives to engage [Historically Black Colleges and Universities](#) (HBCUs) and [Native American communities](#). In partnership with the White House Initiative for HBCUs, the agency presented at the September 2021 HBCU Week Conference and shared NEA grant opportunities and successful application strategies with attendees. In May 2021, the NEA and the Association of Tribal Archives, Libraries, and Museums (ATALM) co-hosted a five-hour virtual convening of Native American, Alaska Native, and Native Hawaiian artists and cultural leaders. The convening – titled “Sustaining and Advancing Indigenous Cultures: Native Artists Summit” – involved over 350 indigenous cultural leaders in discussions focused on funding resources and infrastructure for Native artists. The agency also hosted two Tribal Consultation meetings with Native American leaders while developing the agency's first Tribal Consultation Policy, in response to the White House Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships. In addition, the NEA is developing a strategy to engage Hispanic Serving Institutions. For the first time, in October 2021, the NEA shared funding opportunities and successful application strategies during the Hispanic Colleges and Universities conference.

The NEA's 2022-2026 strategic plan, developed over the course of 2021, includes a cross-cutting objective that will impact every aspect of the agency's work: *The NEA will model diversity, equity, inclusion, and accessibility in the arts through all its activities and operations.* Through the strategic plan, the agency also proposes to enhance community engagement with populations historically underserved by the NEA and whose access to the arts is limited because of geography, ethnicity, socio-economic status, or disability.

## **Equity Action Plan for Arts Participation in Underserved Communities**

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**Barrier to Equitable Outcome:** A significant barrier to equitable outcome is the gap between the availability of arts programming and actual participation in the arts. While the NEA makes arts programming available to populations historically underserved by the NEA and whose access to the arts is limited because of geography, ethnicity, socio-economic status, or disability, these groups participate in arts programming at lower rates than the national average of 54% ([NEA Report U.S. Patterns of Arts Participation, Dec. 2019, page 20](#)). These historical disparities illustrate a lack of effective engagement with these communities. Therefore, to fulfill its mission by promoting equal access to the arts in every community in America, the NEA will focus not just on making programs widely available, but also on equitable engagement that builds participation among historically underserved groups.

According to the NEA's *U.S. Patterns of Arts Participation Report*, populations impacted by this barrier include individuals at the lowest levels of educational attainment (grade school, some high school, or high school degree), populations over the age of 75, populations that live in non-metro areas, and populations that identify as African American, Hispanic, or Asian (see Appendix A).

### **Action and Intended Impact on Barrier:**

The NEA plans to address disparities between the availability of arts programming and the participation of underserved groups by investing in a pilot initiative that will support arts organizations that have demonstrated consistent engagement with underserved communities. The NEA anticipates that this initiative will utilize Regional Arts Organizations (RAOs) to support leaders of equity-focused organizations in the arts through "capacity-building" subgrants, learning opportunities, and peer network-building. This initiative would support approximately 30-40 subgrantee organizations with grants in the range of \$200,000 each, over a multi-year timeframe. Subject to the availability of funds, these "capacity-building" subgrants will support:

- Continued engagement with underserved communities, including outreach, marketing and advertising.
- Improvements to organizations' abilities to engage effectively with underserved communities, including strategic planning, logic modeling, equity planning, field research, stakeholder engagement, and cultural competency training.

The NEA and RAOs will engage a technical assistance provider, which will facilitate learning opportunities among the cohort of subgrantees. While specific learning opportunities will be

designed collaboratively with the subgrantees, topics may include: creating logic models; strategic planning; equity planning; budgeting; grants management; equitable community engagement; diversity, equity, inclusion, and accessibility; or related topics. The subgrantees will also have the opportunity to learn from and share with each other.

Led by the NEA's Office of Research and Analysis and an expert equity contractor, the NEA and RAOs will measure and report on this overall initiative, with the goal of informing existing grantmaking practices at the NEA and sharing lessons learned with the broader arts sector. A product of this research will be a report that summarizes best practices in community engagement.

The scale and timing of the launch of the subgranting component of this program is contingent on the agency's final budget. In addition to this new subgranting program, in FY 2022 the NEA is continuing to reach underserved communities through its established grant programs, such as Grants for Arts Projects and Challenge America. In FY 2022, the expert equity contractor will assist the NEA in tracking the progress of these efforts against the Equity Action Plan (detailed below).

**Tracking Progress:** In FY 2023, the NEA will develop a long-term monitoring and evaluation strategy using outcomes data to assess the effectiveness of the NEA's Equity Action Plan. Possible outcome measures for "Arts Participation in Underserved Communities" include, among the 30-40 subgrantee organizations participating in the pilot, higher rates of engagement with underserved groups/communities; and greater numbers of arts nonprofits utilizing best practices on effective engagement with underserved groups/communities. To effect outcome improvements in its own grantmaking, the NEA anticipates several programmatic changes. They may include: creation of a new grantmaking "project type" (for example, "planning and sustainability") within the agency's existing grant programs; addition of new relevant language into the Grants for Arts Projects guidelines; a change in reporting requirements; and similar system-wide adjustments. Finally, pending future appropriations, this initiative may graduate from a "pilot" to an ongoing grant program.

In the nearer term, the NEA will monitor and report on outputs as part of its effort to track progress. Monitored outputs may include the number of subgrant awards made by Regional Arts Organizations with the intent of building the capacity of subawardees to build arts participation among historically underserved groups/communities; publication of a toolkit and report of best practices learned through the pilot initiative; and recommendations for improvements to NEA grantmaking practices to more effectively engage with underserved groups/communities.

**Accountability:** This initiative aligns with the goals and objectives set forth in the agency's 2022-2026 strategic plan, as follows:

- Goal 3: Build capacity and infrastructure within the arts sector through knowledge-sharing, tools, resources, and evidence-based practices. Objective 3.1: Support the development of skills and strategies that will enable arts leaders to manage more effective organizations and agencies.
- Cross-cutting objective: the NEA will model diversity, equity, inclusion, and accessibility in the arts through all of its activities and operations.

As an integral part of the NEA's strategic plan implementation, the agency's Office of Research and Analysis will report on this initiative each year, as part of the agency's Annual Performance Report.

## Equity Action Plan for Community Engagement

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**Barrier to Equitable Outcome:** A priority for the National Endowment for the Arts is to ensure that all communities – particularly underserved communities – are aware of the financial and informational resources provided by the NEA. Informing communities about funding opportunities and the application process, however, requires targeted, persistent engagement through traditional and non-traditional avenues. In addition, the NEA must examine how the arts benefit other facets of daily life – including economic vitality, formal and informal education, health and well-being, and the resilience of military and veteran personnel and their families – across communities of different types. Effective sharing of this information requires targeted marketing and engagement strategies through community programming and online communities.

As referenced in the NEA’s 200-Day Equity Assessment Report, smaller to medium-sized non-profits that may be unfamiliar with federal grantmaking do not have the resources to monitor opportunities, or may be overwhelmed by the complexity of the application process and/or grant management requirements if the application is successful. The multiple application portals, reporting needs, and the requirement to provide cost share/matching funds, are daunting to many. In some regions, lack of internet access makes it impossible to apply for and manage federal funds. Resources and training are needed to engage with diverse communities and with trusted sources of information for such communities.

An initial review of arts, cultural, and humanities organizations indicates that about 68% are relatively small non-profits (with budgets less than \$500,000); however, only about 37% of NEA grant applicants fall into this category. Further, an initial review of the communities served by some of NEA’s national initiatives shows a less equitable reach into locations that are predominantly African American and/or Hispanic, compared with other communities.

### **Action and Intended Impact on Barrier:**

During outreach for the American Rescue Plan funding opportunities, the NEA expanded its efforts to engage with communities by holding webinars with key partner organizations and Members of Congress, by hosting live Q&A sessions for potential grant applicants, and by producing technical assistance videos that were promoted widely on social media and to different communities.

Comprehensive public relations efforts will be enhanced to inform the general public, with more focused engagements targeting underserved communities. The NEA will act on the following:

Website upgrades: Continue to refine the website presentation to make it more user-friendly, and produce creative, engaging, and diverse content for the general public as well as underserved communities. In early 2022, the NEA is undertaking an agency-wide review to assess and upgrade the website to improve its effectiveness, and to better serve first-time grant applicants and grantees and first-time visitors to the NEA website.

Social Media utilization: Increase use of social media to push out information to larger and more targeted audiences. In 2021, the NEA partnered with other federal agencies to promote common content; in 2022, the agency will continue to enhance the reach of its social media platforms.

Staff training opportunities: Conduct training for staff to learn more about effective strategies to reach diverse media. In the first six months of 2022, the NEA plans to hold internal seminars to strengthen staff outreach to diverse organizations, media outlets, and opinion leaders.

Strategic Engagement within the public sector: In early 2022, an Agency Task Force will be formed with the purpose of coordinating the agency's engagement efforts, including development of systematic communication with the following partners:

- Congressional Affairs: Continue efforts to engage with Members of Congress on matters related to NEA grantmaking and other programs.
- Intergovernmental Affairs: Building on the NEA's previous work with U.S. Conference of Mayors, enhance communications with state and local officials to learn more about the needs of states, cities, and counties.
- Key Opinion Leaders: Connect with influencers and organizations in diverse communities, representing a wide array of artistic disciplines and cultural traditions.
- Federal Agencies: Partner and extend relationships with other federal agencies on shared missions, as has been done most recently with the Center for Disease Control to raise vaccine awareness.
- Minority-Serving Institutions (MSIs): To be modeled after the NEA's current engagement initiative with the HBCU community, forge stronger ties with MSIs in general.
- NEA Alumni: Organize network with past National Council on the Arts members, NEA honorees/leaders, and NEA former staff.
- State and Regional Organizations: Continue to work with State Arts Agencies and Regional Arts Organizations on sharing information and best practices to reach diverse communities.

Translations for non-English language users: In alignment with strategies for language translation referenced on page 8, as appropriate, public materials will be translated into other languages for more effective message delivery. ARP efforts included first-time translation efforts in Spanish and Chinese. The 2022 grant guidelines are currently posted on our website in English and will be translated into Spanish later in 2022. Select public materials have and will continue to be translated on a case-by-case basis.

Creative and Visual Storytelling about the NEA: In 2021, the number of first-time NEA applicants increased due in part to public engagement efforts around the ARP funding opportunity. Future strategies that aim to increase grant applications from underserved communities will be tailored to likely first-time applicants. Therefore, in addition to focused engagement, more comprehensive explanations – such as storytelling – will be needed. The NEA's grant opportunities are vast and varied, contributing on many fronts to distinct communities nationwide. Promoting success stories about NEA grantees through multiple

platforms and events will not only give a boost to grantee organizations and the communities affected—it will show prospective applicants how success is achieved. The NEA has a rich track record of telling the stories of grantees through blogs, social media, podcasts, and magazines. In 2022, NEA will continue such efforts and will focus efforts to tell ARP success stories from diverse communities throughout the nation.

Economic Storytelling about the arts: Annual statistics produced by the Bureau of Economic Analysis (BEA) and the NEA have consistently shown the economic benefits that the arts and culture bring to communities nationwide. This storytelling works hand in hand with other creative narratives. The NEA is widely respected throughout the arts and culture sectors for its research and analysis work, often partnering with the nation’s top research organizations. In 2022, NEA will partner with BEA again to review the current statistics and report on the economic benefits of arts and culture—extending to analyses for all 50 states.

**Tracking Progress:** In FY 2023, the NEA will develop a long-term monitoring and evaluation strategy using outcomes data to assess the effectiveness of the NEA Equity Action Plan. Possible outcome measures for “Community Engagement” include higher rates of small to medium-sized non-profits receiving NEA grants; and more equitable engagement of communities in NEA national initiatives, regardless of race/ethnicity, geography, and poverty status.

In the nearer term, the NEA will monitor and report on outputs as part of its effort to track progress. Monitored outputs may include the percent of applications received and adjudicated by the NEA from organizations primarily serving underserved communities or populations, and the success rate of these applications.

**Accountability:** The NEA will continue to engage with potential grantees, arts and community leaders, and the general public. Progress will be reported at regular meetings of the National Council on the Arts, and through published annual reports, as well as NEA staff meetings. Modeling diversity, equity, inclusion, and accessibility in the arts through all of our activities and operations is a cross-cutting objective in the NEA’s 2022-2026 strategic plan. This plan also includes an objective to prioritize data-driven methods to broaden and deepen engagement with underserved communities. By more frequently consulting empirical data about the demographic and geographic characteristics of various target populations, the agency will achieve a greater likelihood of success in building and sustaining relationships with people and organizations that have been underserved by NEA programs.

### **Equity Action Plan for Accessibility**

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**Barrier to Equitable Outcome:** As discussed on page 3, persons with disabilities are historically underserved by the federal government and have less access to the arts than the general population. Despite federal laws, and the NEA’s own historic efforts to build capacity for accessibility in the arts sector, people with disabilities still face barriers to accessing the arts, including access to physical facilities, programs, and communications. In addition, according to data from the NEA’s 200-Day Equity Assessment Report, several of the agency’s

grant programs can increase the number of people with disabilities benefiting from NEA funded activities. Language access also poses barriers for those with limited English proficiency, for organizations serving communities where English is a second language, and for federally recognized tribes and territories where English is also a second language. In addition, NEA grantmaking processes pose barriers to people with disabilities and those with limited English proficiency.

The NEA has identified barriers to the grant application and panel process, including problematic electronic documents and systems for those using screen-reading software, and difficulties for those with cognitive or intellectual disabilities who may have problems navigating the agency's and the federal government's common grant application systems, including Grants.gov and SAM.gov. In addition, for panel review of applications, the short timeline for review and the processes' utter reliance on computer systems poses barriers for panelists who have difficulty reading, using screens for long periods of time, or using screen-reading software.

Language barriers include lack of translation/interpretation for applicant guidelines across existing grant programs (non-ARP guidelines) and for other application materials, grantee resources, general outreach tools such as webinars and social media, and public events such as the NEA National Heritage Award and Jazz Masters events.

Evidence of such barriers has been identified through ongoing formal and informal communications with NEA staff by grantees, panelists, would-be applicants, and members of the disability community, as well as through communications with Hispanic and Native American arts leaders at NEA national convenings.

### **Action and Intended Impact on Barrier:**

*Disability* – To address barriers to the application process, in 2022 the NEA will develop concrete policies and procedures for providing access accommodations for the overall grantmaking process. In addition, across 2022-2023, the agency will conduct a Section 508 (of the Rehabilitation Act) assessment of key electronic systems to include grant application, grants management, panelist operations, and other systems. The agency will also explore holding town halls and/or focus groups to determine community needs around accessibility and disability equity. In 2022-2023, the NEA will determine how best to help arts organizations improve accessibility for programs and activities; explore the possibility of developing funding initiatives specific to accessibility; explore the possibility of establishing a technical assistance initiative (via contract or cooperative agreement) to assist organizations with the barriers that they encounter due to disability or language; and explore the possibility of greater education and technical assistance services around accessibility. These expansion efforts may involve new staffing needs and expansion and/or partnerships with external organizations such as the Regional Arts Organizations.

*Language* – As Spanish is the second-most prevalent language in the United States, starting in 2022 the NEA will award a contract to translate select grant guidelines into Spanish each year. NEA



translation may also include Spanish subtitles for webinars, translation of relevant social media posts, Spanish interpretation services at live events (in-person or virtual), translation and interpretation services for NEA staff to use in internal and external communications, and other services. Through the NEA's Limited English Proficiency (LEP) request process, guidelines and other documents may be translated into other languages upon request.

These proposed actions were identified based on feedback from constituents, technical assistance requests for access accommodations from applicants and grantees, feedback from both staff and applicants to the ARP grant program, and feedback from the NEA's Tribal Consultation. As a result of these activities, the NEA can expect that more organizations serving and employing people with disabilities, and more Hispanic-serving organizations, will become aware of and apply to the agency for funding; people with disabilities will have better access to NEA funding and initiatives; and arts organizations will improve their accessibility for people with disabilities.

**Tracking Progress:** In FY 2023, the NEA will develop a long-term monitoring and evaluation strategy using outcomes data to assess the effectiveness of the NEA Equity Action Plan. Possible outcome measures for "Accessibility" component include greater numbers of individuals with disabilities and Hispanic populations benefiting from NEA programs.

In the nearer term, the NEA will monitor and report on outputs as part of its effort to track progress. Monitored outputs may include the number of applications received and adjudicated by the NEA from organizations serving people with disabilities and Hispanic-serving organizations, as well as the success rate of these applications; and the number of people who access Spanish language guidelines, webinars, and other grant-related resources.

In 5-8 years, we anticipate that the NEA will be seen as one of the primary drivers of equity for people with disabilities in the arts by building on previous success and deepening the work. NEA staff will have a clear process for having materials translated when needed, and will be equipped with resources to provide language interpretation and access services (including ASL and captions) for live events (webinars, public programs, panel meetings, etc.) as needed. Flagship public events will be equipped with translation (including captioning/subtitles) of films and program books, and will have ASL and Spanish interpretation services available to audience members to facilitate full participation in agency events.

**Accountability:** The NEA will conduct regular consultation with the disability and Hispanic-serving communities and track their application success rates.

### **Equity Action Plan for Data**

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**Barrier to Equitable Outcome:** Demographic analysis of the beneficiaries/audiences of selected NEA programs and services produced for the 200-Day Equity Assessment Report highlighted areas for improvement in the agency's reporting ability. The NEA currently collects self-reported data on grant project beneficiaries, but not all populations included in the President's Executive Order are addressed on the NEA's final descriptive report forms for grantees. Consequently, the NEA cannot reliably estimate the extent to which its programs and services reach all populations referenced by the Executive Order. The NEA will explore changes to the data fields for self-reporting, but note that

such changes and decisions based upon the data compiled will require further coordination with other federal agencies.

Meanwhile, the NEA currently lacks data tools and training readily available for program staff to obtain and analyze equity-related data on programs and services. Without training and data tools, program staff cannot optimally use such data to guide outreach to specific underserved groups.

### **Action and Intended Impact on Barrier:**

#### *Strategy 1: Improve Data Collection*

In FY 2022, through its Offices of Research & Analysis (ORA), Guidelines & Panel Operations, General Counsel, Programs & Partnerships, Grants Management, and Civil Rights, and working with the Department of Justice, the NEA will determine the feasibility of expanding data collection related to beneficiaries, as well as to the staff and the leadership of recipient organizations. If feasible, adjustments will be made to program data collection forms to increase equity-related information available to staff. This strategy will be implemented through distinct actions addressing the agency's direct grants and partnership agreements.

1a. Direct Grants. The NEA offices responsible for designing grant data-collection forms (Office of Guidelines & Panel Operations, Office of Grants Management, and ORA) will coordinate a "forms review" to identify data gaps in reporting demographics of populations served, staff and leadership of grantee organizations, and individuals receiving fellowships and honorifics.

1b. Partnership Agreements. The NEA offices responsible for designing grant data-collection forms (ORA, Office of Grants Management, and Partnership Division) will collaborate with an agency cooperator, the National Assembly of State Arts Agencies (NASAA), to coordinate a forms review similar to 1a. The forms review process will include consultation with State Arts Agencies and Regional Arts Organizations to identify desired improvements to data elements.

For 1a and 1b, new or revised question-items will be drafted and submitted for review to the agency's Office of General Counsel, which will consult with the Department of Justice as appropriate on the proposed changes. New or revised question-items will be further subject to testing. By September 1, 2022, the revised data-collection forms will be submitted as part of two Paperwork Reduction Act (PRA) clearance packages for grant application guidelines and final report forms, respectively.

#### *Strategy 2: Develop or Improve Internal Data Equity Tools*

The 2022-2026 Strategic Plan calls for prioritizing data-driven methods to broaden and deepen engagement with underserved communities (Objective 1.2). In FY 2022, the NEA intends to use data analysis to identify and address gaps in representation of underserved groups among the NEA's grant applicants, grantees, and program beneficiaries. In alignment with the aforementioned initiative to increase arts participation (see page 3), this evidence base will permit the NEA to conduct effective outreach and engagement and make strategic investments

to meet the needs of communities facing persistent barriers in accessing or benefiting from arts programs.

Using data effectively to broaden and deepen engagement with underserved communities requires data tools and training that can provide Programs & Partnerships staff with the capability to conduct equity-focused analysis of agency grants and initiatives. ORA will update an interactive map application for senior agency leadership that provides high-level summary data on agency grant awards, including direct grants and subgrants, and NEA national initiative activities for the preceding three-year period. The map, which already includes Census data on poverty and urban areas, will be updated to include additional information on underserved communities, including race and ethnicity.

Also, equity-focused modules will be incorporated into dashboards developed for senior leadership and Programs and Partnership staff. During the design phase, an ORA contractor will consult with staff to develop key equity indicators and finalize the dashboard design. ORA will lead training on use of these data tools and preparing data requests, and help staff in using and interpreting equity-related data.

### *Strategy 3: Establish Equity Measurement Framework and Monitoring Strategy*

In FY 2023, the NEA will develop a long-term monitoring and evaluation strategy using outcome data to assess the effectiveness of agency strategies to address equity. ORA will engage a contractor to help the agency develop a logic model and a measurement framework (based on the logic model) that identifies key process and outcome indicators for the agency's equity plan. Once established, the equity measurement framework will provide the foundation of a monitoring and evaluation plan to ensure continuous tracking of progress and measurement of outcomes for the NEA Equity Action Plan. Another outcome from this engagement will be the design of an evaluation plan.

**Tracking Progress:** As noted above, in FY 2023 the NEA will develop a long-term monitoring and evaluation strategy using outcomes data to assess the effectiveness of the NEA Equity Action Plan. Possible outcome measures include increased NEA staff use of data to better understand the impact of the agency's grantmaking and demonstrated NEA actions to improve equity in response to outcomes data on the effectiveness of the NEA Equity Action Plan.

In the nearer term, the NEA will monitor and potentially report on outputs as part of its effort to track progress. Monitored outputs may include the number of new or revised questions on grant forms that improve the collection of equity data; the number of new or improved data tools providing NEA staff with access to robust data and analytical methods to inform outreach efforts; the development of an equity measurement framework; and production and implementation of a monitoring and evaluation plan for the NEA Equity Action Plan.

**Accountability:** Accountability is ensured through the agency's 2022-2026 Strategic Plan and Annual Performance Plan, which includes several performance measures focused on broadening and deepening engagement with underserved communities. Progress will be reported through the agency's Annual Performance Report.

## **Equity Action Plan for Contracting and Procurement**

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**Barrier to Equitable Outcome:** The 200-Day Equity Assessment Report compiled a five-year period of the NEA's contracting dollars to small businesses. The report findings revealed that as a small agency, the NEA awards approximately \$5M annually in contracting, of which 85% is awarded to small disadvantaged businesses. The NEA has exceeded the Small Business Administration's (SBA) small business goals for the agency. Based on the Federal Procurement Data System (FPDS) for FY 2020, below is the distribution of contracts the NEA has awarded to small businesses:

- Small Disadvantaged Business - 52%
- 8a Certification – 32%
- Woman Owned – 10%
- Veteran Owned – 16%
- Service-Disabled Veteran Owned – 13%
- Certified HUBZone - 14%

The Federal Government awards 10% of all federal contract dollars, or \$50 billion in contracts, to Small Businesses. While small business/minority contracting programs have proved rewarding to both contractors and the U.S. Government, significant obstacles and barriers still confront small businesses/minority contractors in their attempt to bid for and obtain Government contracts. Evidence of ongoing and persistent discrimination against small businesses/minority contractors has been documented by court cases, contract protests, and SBA complaints over the years. Structural barriers, including access to financing, bonding, and upfront capital, continue to impede the performance and successful participation of small businesses/minority contractors. These barriers are roadblocks for small business/minority contractors and could potentially impede the process for bidding on solicitations.

Although the agency has met the small business goals of the SBA, there is still room for improvement in the NEA's contracting and procurement processes. The NEA is committed to doing what it can to break these barriers articulated above. By creating opportunities through outreach, awareness, education, marketing, and building stronger relationships with the small business/minority community, the agency will target small businesses such as HUBZone, Woman, Veteran, and Service-Disabled Veteran Owned businesses. These businesses, based on FPDS data, have had fewer contracting opportunities with the NEA.

### **Action and Intended Impact on Barrier:**

#### *Strategy 1: Develop an Agency Contracting Officer Representative (COR) Training Program*

In FY 2022, the NEA will develop a training program for the agency's current and future CORs. The program will enhance knowledge in the following areas to further increase the agency's equity in procurement by: 1) Understanding market research; 2) Understanding the development of the statement of work; 3) Understanding the government procurement sites such as GSA eLibrary and SAM.gov; and 4) Anti-bias Training. The program will be headed by one of NEA's senior contracting officers.

### *Strategy 2: Establish a Business/Engagement Specialist Role*

In FY 2022/2023 the NEA may establish a new role in which the Contracting Officers will be responsible for outreach, awareness and relationship building in the underserved/underrepresented communities and small businesses. The new role would also be responsible for partnering with other agencies and hosting small business forums to discuss some of the barriers that are affecting these communities.

### *Strategy 3: Relationship Building*

In FY 2022, the NEA will utilize the Contracting Officers and CORs to build intentional and sustainable relationships through targeted and local outreach. We will enable businesses to build a connection with the NEA to better understand the procurement process and how businesses that are underserved/underrepresented can be successful throughout the NEA procurement process.

The Contracting Officers will be responsible for improving clarity around the NEA's procurement process by creating additional materials to help simplify federal and procurement terminology and to offer better communication to businesses who try to contact the agency for assistance.

**Tracking Progress:** In FY 2023, the NEA will develop a long-term monitoring and evaluation strategy using outcomes data to assess the effectiveness of the NEA Equity Action Plan. Possible outcome measures for the "Contracting and Procurement" component of this plan include an increase in the rate of contracts awarded to HUBZone, Woman, Veteran, and Service-Disabled Veteran Owned businesses.

In the nearer term, the NEA will monitor and report on outputs as part of its effort to track progress. Monitored outputs may include the number of outreach contacts made to HUBZone, Woman, Veteran, and Service-Disabled Veteran Owned businesses; and the number of these targeted businesses responding to NEA contract solicitations.

**Accountability:** The Contracts Office will take responsibility for promoting potential contract awareness, outreach, and education to the small business communities. The Contracting Officers will closely monitor the market research and engagement efforts of the CORs and Project Officials to ensure that market research is being conducted in an equitable manner.

The NEA will commit to partnering with other agencies to adopt best practices in promoting awareness and outreach in the small business community.

### **Embedding Civil Rights in the Equity Action Plans**

The NEA's Office of Civil Rights and Equal Employment Opportunity (OCREEO) consists of a Director with one full-time permanent EEO specialist, and one term EEO/ARP specialist. The Office of Civil Rights ensures that organizations and individuals receiving services from NEA-funded or conducted programs are not subject to discrimination.

The OCREEO has a leading role in implementing Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. Designated by the NEA Chairman, the OCREEO Director co-led the agency-wide development of the Equity Action Plan.

The Office of Civil Rights will pursue the following strategies to support the implementation of the five equity action plans for Arts Participation in Underserved Communities, Community Engagement, Accessibility, Data, and Contracting and Procurement:

*Strategy 1: Educate the staff*

In FY 2022 and beyond, OCREEO will partner with the Office of Human Resources to deliver a series of trainings centered on equity and civil rights laws which will equip staff with the necessary knowledge and information necessary to implement these plans through an equitable lens within the framework of the civil rights laws.

*Strategy 2: Educate the public and provide technical assistance*

Equity begins with nondiscrimination. In FY 2022, OCREEO will host webinars to educate applicants, grant recipients, and federal contractors about the civil rights laws, guidance, and directives that apply to the receipt of federal funds. OCREEO will also model equity and provide technical assistance to federal funds recipients on best practices to develop, deploy, and accomplish equity goals.

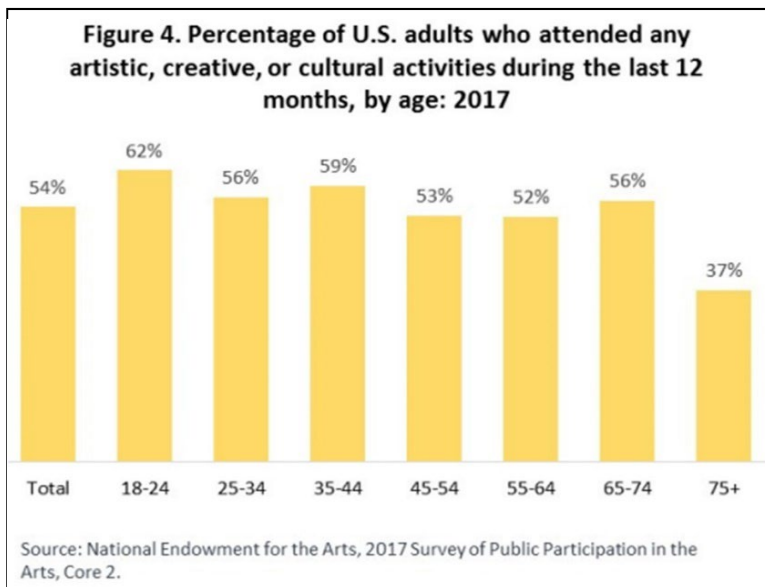
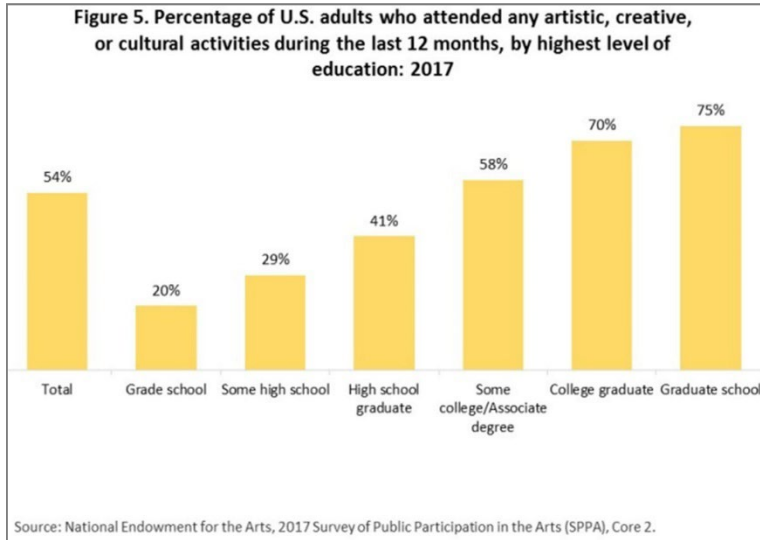
*Strategy 3: Conducting enforcement and compliance efforts*

Commencing in FY 2022, the OCREEO will begin strategic planning for implementation of compliance reviews on organizations receiving federal funds from the NEA. OCREEO will partner with the Office of Research and Analysis and Department of Justice, as appropriate, to collect data on demographics and complaint activity, and the organizations' Diversity Equity Inclusion and Accessibility strategies. This process will ensure that organizations are complying with civil rights laws and approaching their work through an equity lens.

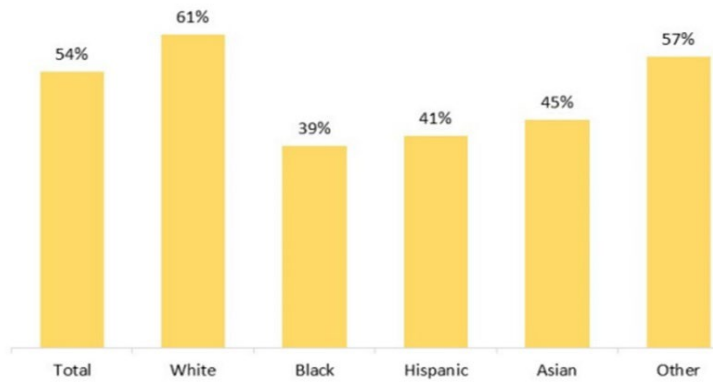
## APPENDIX A

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### Charts from 2019 National Endowment for the Arts Report: [“U.S. Patterns of Arts Participation”](#)



**Figure 3. Percentage of U.S. adults who attended any artistic, creative, or cultural activities during the last 12 months, by race/ethnicity: 2017**



Source: National Endowment for the Arts, 2017 Survey of Public Participation in the Arts (SPPA), Core 2.

### Participation in the arts in Metropolitan Areas vs. non-Metropolitan Areas

Type of activity	Average participation for US Adults	Adults in Metropolitan areas	Adults in non-metro areas
Attended an art exhibit	23%	24%	16%
Attended a live music performance	42%	43%	34%
Attended a live play or musical	24%	25%	19%
Attended a live dance performance	15%	16%	13%
Read novels or short stories	42%	43%	37%

(Report, pages 90-100)