

FOA: Sunil Iyengar, Office of Research & Analysis, National Endowment of the Arts

**SUBJECT: SUPPORT FOR NEA'S PROJECT DOCUMENTATION APPROACH RE  
FR Doc. 2025-08782 Filed 5-15-25.**

11 Jul 2025

The NEA's efforts to advance the arts within the United States is deeply valued. We also appreciate the agency's work to improve final reporting processes for project teams and administrators.

The recommendations below were prepared in consultation with grants administrators and prior awardees who have experience with the NEA's final reporting. We additionally reviewed the [Information Collection List](#) provided via email on June 12, 2025. Our comments focus on the requirements **for organizations**, and in particular, the Final Descriptive Reports for **Standard and Research projects**.

We strongly emphasize **our support for the descriptive approach to NEA's final reporting:**

- The collection and descriptive reporting opportunities provided by the NEA's final reporting process are fully supported. The process is useful, clear, and should continue as proposed.
- The final reporting process is not overly burdensome for research universities.

Additionally, we highlight **two recommendations to improve automation and digital entry:**

- **Add automation by prepopulating metadata** — namely the tables of project partners, funders, and artists — from prior award materials to remove data re-entry and reduce burden.
- **Add a short statement offering guidance for completion of the 'nature of involvement' fields.** This will clarify the type of information the agency seeks and ensure consistent and useful data collection.

**INFORMATION COLLECTION VIA DESCRIPTIVE REPORT REQUIREMENTS  
IS REASONABLE, NOT A BURDEN, AND VALUED:**

We support the NEA's continued use of descriptive reporting. Across award programs, the NEA favors project narratives that ask awardees to describe activities,

accomplishments, and challenges using character-limited open-ended text fields. Our consensus is that the NEA's descriptive report process is clear both in guidance provided and instruction offered. Additionally, the expectations are reasonable.

The use of broad narrative-driven questions is especially appreciated. This approach allows the principal investigators and their teams to tell the story of the project and its impact. The flexibility of this format is important, as it enables awardees spanning a range of artistic and creative practices, domains, and outcomes, to represent their projects effectively.

The nature of the questions has generally been useful. Awardees have found value in preparing these responses and have been able to re-use these reflections to support other documentation and dissemination activities, to the benefit of the funded project. In sum, the approach is reasonable, useful, clear and not overly burdensome.

#### **THE BURDEN OF PREPARING FINAL REPORTS FOR THE NEA IS REASONABLE FOR R1 RESEARCH UNIVERSITIES:**

Clear and well-organized [guidance](#) is provided on the NEA website, and most required fields within eGMS/REACH are well described (see one exception below.) This is appreciated and should continue. While some PIs have found eGMS/REACH confusing and arduous to work with directly, grant administrators at our institution are familiar with the system and provide effective support to PIs in entering final reports into eGMS/REACH, making the process manageable within the context of a research university.

That said, we acknowledge that experiences may differ. Investigators at museums, community colleges, or R2 universities may lack the same administrative infrastructure. We encourage the NEA to defer to and incorporate feedback from those contexts as well.

#### **STREAMLINE THE COLLECTION OF INFORMATION FOR THE INVOLVEMENT OF KEY PARTNERS, FUNDERS, AND ARTISTS BY PREPOPULATING TABLE.**

We recommend clarifying the level of descriptive detail required in the "Nature of Involvement" fields and pre-populating the table of key actors based on previously entered documents, i.e. the approved scope of work or the original proposal.

As part of final reporting, awardees must provide a list of key partners. This involves providing the *Name of Key Partner*, defining the *Type of Entity* by choosing from a drop-down, describing the *Nature of Involvement* (in 750 characters), and indicating whether the partner *Contribute[s] to Cost Sharing/Match*. Since the name and type of entity are already provided during the award process, eGMS/REACH could pre-fill this information. This would decrease the administrative burden of data (re)-entry for awardees.

#### **ADD A SHORT STATEMENT TO BETTER GUIDE COMPLETION OF THE 'NATURE OF INVOLVEMENT' FIELD**

We recommend clearly defining the expectations for and level of descriptive detail required in the 'Nature of Involvement' fields to ensure consistent data collection relative to agency needs.

Administrators expressed uncertainty about the desired level of detail and what information is most useful to the NEA. They noted that responses may vary in format—for example, as a :

- General role attribution (e.g., principal investigator, consultant, research assistant)
- One- or two-sentence descriptions of contributions
- References to specific activities mentioned in the project narrative

At a minimum, the NEA should add a clarifying note to the table to guide data entry. This would have the benefit of clarifying expectations, increase consistency, and improve usefulness of the data, while reducing the risk of excessive or inconsistent reporting.

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We appreciate the opportunity to help shape grantee reporting in ways that reduce complexity and to help improve alignment with the NEA's program goals.

Sincerely,

A handwritten signature in black ink, appearing to read 'DB', with a long horizontal flourish extending to the right.

Daragh Byrne