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# FY2025 Catalyzing Impact Grant Program Guidelines



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# Catalyzing Impact Grant Program Guidelines

## Purpose

The purpose of the Catalyzing Impact Grant Program is to encourage a breadth of programming through arts and cultural heritage projects that support the goals of ArtsWave's Blueprint for Collective Action ([Appendix A](#)). This project is also supported in part by the National Endowment for the Arts (NEA) and must meet their review criteria as included in the Grant Application Glossary ([Appendix B](#)), as well as, comply with the federal regulations and policy requirements set forth by this award ([Appendix C](#)). Catalyzing Impact 2025 grant projects must occur between January 1, 2025 and December 31, 2025. Note: the project cannot be completed prior grant award notification in February 2025.

**NOTE:** Because there is a federal grant match for the Catalyzing Impact grants, there are additional questions that must be answered and approved as part of the application process. This includes a specific address of the main activity for the grant. Before we can award the grants, the NEA must approve of the location to ensure there is ADA compliance and that the project will cause no historical or environmental harm. Projects without a specific location designated will be disqualified.

## Who May Apply

ArtsWave believes that strong arts create strong communities and actively seeks to promote access, equity, and inclusiveness in its grantmaking. To be eligible for the FY2025 Catalyzing Impact Grant Program, an organization must meet all the following requirements:

- Have a 501(c)3 tax status or be non-profit in nature with an established fiscal agent.
- **NEW: Have already received a federal government Unique Entity Identifier (UEI). This number replaces the previously required DUNS number and can be applied for at SAM.gov.**
- Based in the Cincinnati-Middletown, OH-KY-IN MSA, which includes the following counties: Brown, Butler, Clermont, Hamilton, and Warren Counties in Ohio; Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton Counties in Kentucky; and Dearborn, Franklin, and Ohio Counties in Indiana.
- Did not receive a Sustaining Impact grant for the new cohort cycle beginning FY2024.
- Does not currently have an open Catalyzing Impact Grant with ArtsWave that will not be completed by February 1, 2025 and has successfully completed all previous Catalyzing Impact grant requirements.
- Has not received funding for the proposed project through another ArtsWave project grant.\*
- Embody ArtsWave's commitment to access, equity, and inclusiveness.

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*\*Proposed projects that have already been funded through the ArtsWave Pride, Young Professionals, Circle's African American Arts grant programs or Project Grants for Black and Brown Artists are not eligible for funding. A recipient of any of those grant programs is still eligible to apply if they meet all of the requirements above and proposes a different project for the Catalyzing Impact grant program.*

**NOTE:** Applicants new to ArtsWave **must** schedule an introductory virtual meeting or phone call prior to the application deadline. Please contact Lori Burkhardt at [lori.burkhardt@artswave.org](mailto:lori.burkhardt@artswave.org) to schedule a time. Returning applicants are also encouraged to reach out with any questions they may have related to their project or application. All applicants will be given the opportunity to submit their applications by a pre-deadline, specified date as a review and edit resource.

**UPDATE:** Beginning with the FY23 grant cycle, an organization may apply for funding for two (2) consecutive years and if awarded funding in both years would then be required to take one (1) year off before applying for the Catalyzing Impact grant program again. For example, if you were **funded for** Catalyzing Impact in FY23 and FY24, then you would be ineligible to apply in FY25.

## Eligible Requests

The Catalyzing Impact Grant Program provides funding for arts or cultural heritage projects that demonstrate impact in one or more of the five goals of ArtsWave's Blueprint for Collective Action. This project is also supported in part by the National Endowment for the Arts and must meet their review criteria, as well as, comply with the federal regulations and policy requirements set forth by this award.

**A project is defined as a specific, connected set of activities with a start date, end date, and explicit goals and objectives** (see [Appendix B](#) for more application definitions). Projects with multiple components and/or event dates must show a cohesive theme that ties the entire project together.

Receiving a Catalyzing Impact grant is a competitive process. Eligible project requests may include a new project or an existing project that demonstrates an expansion of impact. Organizations proposing existing projects that have been funded through the Catalyzing Impact program in previous fiscal years should be prepared to demonstrate how the proposed work is expanding impact. Examples may include:

- serving a new or expanded geography (e.g., neighborhood, municipality, or county);
- serving a new or expanded audience (e.g., age or culturally specific); or
- deepening impact within an existing project (e.g., expanded themes, content, or timeframe)

Catalyzing Impact Grants cannot be requested for any of the following:

- General operating support
- Fundraisers
- Re-granting
- Advancing or inhibiting a religious ideology
- Advocacy of specific political causes or candidates

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ArtsWave will not award grant support to organizations that, in their constitution, bylaws, or practices, discriminate against a person or group because of age, race, national origin, ethnicity, gender, disability, sexual orientation, political affiliation, or religious belief. In doing so, we seek to promote respect for all people.

*Organizations may only submit one application per deadline. Organizations may only receive one Catalyzing Impact Grant in a single fiscal year.*

## **Grant Amounts**

Grant awards will be made up to \$10,000 or 50% of the total expenses for the proposed project and may be funded partially or in full. Please note in the application if you cannot complete your project with partial funding.

## **Match Requirements**

Grants received through the Catalyzing Impact Grant Program are matching grants through which applicants are expected to leverage ArtsWave funds to secure support from outside sources. This grant program **requires a 1:1 match by the applicant**. Up to 50% of your organization's matching dollars can come from in-kind contributions. Matching funds do not need to be secured at the time of application, but documentation of the source(s) of matching funds will be required in the final report. For purposes of determining the value, volunteer time should be calculated at \$33.49 per hour (Independent Sector, 2024).

## **Application Instructions**

All application materials must be submitted via Submittable, ArtsWave's online grantmaking system. We strongly recommend that you begin your online application well before the due date to familiarize yourself with the online grantmaking system and to address any technical concerns. While completing your application, remember these tips:

- Be brief, clear and direct, focusing on what is most important.
- Review panelists may have little or no prior knowledge of your organization. Create a stronger application by:
  - not assuming reviewers have extensive knowledge of all artistic disciplines;
  - explaining acronyms; and
  - explaining the characteristics of your community or audience as needed.
- We recommend that you prepare your responses offline in a word processing program and then copy and paste them into the appropriate sections of the online application.
- Limit the use of bullets and other formatting in text fields.
- Add [Impact@ArtsWave.org](mailto:Impact@ArtsWave.org) to your safe senders list to ensure that you receive all communications from the online grantmaking system.
- Use one of the following compatible browsers: Chrome® v.22+, Firefox® version v.27+, Internet Explorer® v.8-10 (if enabled), Internet Explorer v.11, Safari® v.7+, or Edge®.

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The application for the FY2025 Catalyzing Impact Grant Program can be accessed using the following link: <https://artswave.submittable.com/submit/>

To find out more about how National Endowment for the Arts grants impact individuals and communities, visit [www.arts.gov](http://www.arts.gov).

The application consists of the following sections (*\*delineates a field required to submit*):

## **A. Grant Applicant Information**

- Organization name and legal address\*
- If 501(c) 3
  - Organization EIN \*
  - Organization UEI number\*
- If not 501(c)3
  - Describe the non-profit status of your organization, including your organization's relationship with an established fiscal agent. (150-word limit)\*
  - Provide your organization's contract or letter agreement with your fiscal agent \*
  - Fiscal Agent's legal street address
  - Fiscal Agent's EIN\*
  - Fiscal Agent's UEI status/number\*

## **B. Organization Information**

- Organization County/Phone/Website/Neighborhood served\*
- Chief Professional Officer Contact Information\*
- Grant Contact Information (if applicable)
- Type of Organization\*
- Provide a brief description of your organization and the type of programming you provide. (150-word limit)\*
- Describe your organization's audience and the communities you serve. Please include demographic information such as your audience age, communities--geographic, language, ethnicity, etc. (150-word limit)\*
- Has your organization received an ArtsWave grant since 2020? If yes, please list grant(s) and fiscal year(s).
- Number of Full-Time, Part-Time, Contract, and Unpaid staff members and Number of Board members; % BIPOC for each category\*
- Please include your organization's Diversity Statement\*

## **C. Details of Request**

- Project title\*
- Select one Blueprint Goal to which your proposed project most closely aligns.\*
- Provide a summary description of the proposed project that will be used for announcements and other marketing summaries. \*
- Provide the physical address of where the proposed project will be completed, held, or performed. (100-word limit; your response should include a street address, city, state, zip)\*

- Provide a more detailed description of the proposed project. Be sure to clarify how the project relates to the Blueprint goal selected above and the defined criteria for this grant. (500-word limit)\*
- Estimated total participation (Adults and/or Youth)\*
- Project request type\*
  - If "existing project" - Description of project expansion (150-word limit)
- Anticipated project start date and end date\*
- Provide a proposed timeline for project implementation.\*
- Who are the artists involved with this project? Briefly describe their qualifications and background. (150-word limit)
- Please list any organizations you will collaborate with for this project and briefly describe the nature of the collaboration. (150-word limit)
- What are the project's objectives and intended outcomes? What is the change/impact you wish this project to have? These objectives and intended outcomes should be specific, measurable, and aligned to the selected Blueprint goal and reflective of the defined criteria for this grant. (250-word limit)\*
- How will outcomes be measured and who (e.g. staff, consultant, etc.) will measure them? (250-word limit)\*
- Select grant program resource opportunities taken advantage of.\*
- Impact Team feedback opportunity if application submitted by January 3, 2025.\*
- Please upload an example of your organization's work that illustrates your capacity to accomplish the proposed project. (attachment)\*

#### **D. National Endowment for the Arts Additional Questions to ensure ADA, Historical and Environmental compliance**

- Exact address for the majority of the project and description of site.
- Secondary address and site description, if applicable.
- Describe permanence of planned activities.
- Is there a festival or public event with permanent effects?
- Does your project involve outdoors murals or other art?
- Does your project involve temporary public art on a building 50 years old or more?
- Does your project involve erecting or placing permanent wayfinding signs on historic buildings?
- Does your project involve installing small structures (e.g., benches, bus shelters, produce stands) attached to historic buildings or requiring ground disturbance?
- Does your project involve landscape maintenance or rehabilitation (e.g., community garden, urban park) on a NHRP Site(s)?
- Does your project involve in-kind replacements or repairs to a building?
- Does your project involve conceptual planning/design/research?
- Does your project involve information gathering/data analysis/information dissemination?
- If you are proposing a temporary or permanent public art project, provide the age of the building/sites involved and if they are historic. Type NA if not applicable.
- Provide a detailed description of any project activities that might now or someday impact the environment? Type NA if not applicable.
- If an Indian tribe or Native Hawaiian organization might attach religious and/or cultural significance to historic properties touched by your project, describe. Type NA if not applicable.

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- Your organization's ADA policy/statement.
  - Your organization's ADA staff coordinator (if applicable).
  - Describe accessibility capabilities/needs/deficiencies of the project's location.
  - If applicable, describe developed plans to address any accessibility issues of the project location.

## E. Financials

- Annual operating budget\*
- Total project budget\*
- Requested grant amount\*
- How will the grant funds be used? (150-word limit)\*
- Can this project still be completed if award is for partial funding?\*
- Most recent annual financial statement (attachment)\*
- Complete Catalyzing Impact Grant Budget Form\*
- Where do you anticipate receiving the match for your grant from?\*
- Any additional budgetary notations. (150-word limit)
- Please attach a high-resolution organization logo (attachment)\*

**F. Statement of Assurances** – An authorizing official will certify that s/he is authorized to submit the application on behalf of the organization and that the information submitted in the application is true and correct to the best of his/her knowledge.

All application materials must be submitted through the online grantmaking system by **5:00 pm EST on January 15, 2025. Late applications will not be accepted.**

## Grant Overview Session

ArtsWave will host a free, online webinar to go over the Catalyzing Impact Grant Program Guidelines, the application process, and any questions you might have about the program. The webinar will be held on December 17, 2024. For details and to register, please visit:

[FY2025 ArtsWave Catalyzing Impact Grant Program Webinar Registration, Tuesday, December 17, 2024 at Noon | Eventbrite](#)

This webinar session will be recorded and made available on ArtsWave's website.

## Grant Writing Workshops

ArtsWave will host two online Grant Writing Workshop webinars as a free resource in conjunction with this grant program.

The Budgets Grant Writing Workshop webinar will be held on December 18, 2024, at noon. For details and to register, please visit:

[FY2025 ArtsWave Grant Writing Workshop-Budgets Registration, Wednesday, January 3, 2025 at Noon | Eventbrite](#)

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The General Grant Writing Workshop webinar will be held on January 3, 2025 at noon. For details and to register, please visit:

[FY2025 ArtsWave Grant Writing Workshop-General Registration, Thursday, December 19, 2024 at Noon | Eventbrite](#)

## Other Grant Resources

If you would like to receive feedback on your application draft, complete the application in Submittable, and click SUBMIT by January 3, 2025. After we have reviewed your application, you will receive an email through Submittable opening your application to edit that feedback. You must edit and resubmit by the deadline January 15, 2025.

Additional comments and questions can be shared by posting on our new ArtsWave Chat Board <https://artswavechat.proboards.com/>.

## Determination of Grant Amount

All applications will be reviewed by a panel consisting of community volunteers and ArtsWave staff. Applications will be evaluated using the following criteria:

- The organization has the capacity to provide quality cultural experiences for the community;
- The proposed project is aligned with ArtsWave's Blueprint for Collective Action;
- The proposed project meets the NEA's Artistic Excellence and Artistic Merit criteria as defined;
- The project can be achieved in the proposed timeline;
- The project objectives and intended outcomes are clear and measurable; and
- The proposed project budget is reasonable and meets matching funding requirements.

## Grant Requirements

Upon notification of award, grant recipients must submit a grant acceptance form. A single grant payment will be issued once the grant acceptance form has been received and the grantee's UEI has been verified.

Along with the award notification, grantees will receive the FY2025 Catalyzing Impact Grantee Handbook, which will outline the grantee expectations and requirements set by ArtsWave, as well as, the National Endowment for the Arts, for Catalyzing Impact grantees in FY2025. By accepting funding, an organization agrees to adhere to the grant recipient guidelines outlined in the handbook, including all of the Terms and Conditions of the federal portion of their award.

A final report will be due after the project's completion, but no later than December 31, 2025 or prior to applying for another Catalyzing Impact grant. Applicants are ineligible to apply for funding if a previous final report is outstanding. An applicant may not have two Catalyzing Impact grants open at the same time.



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All requirements must be submitted through the online grantmaking system, and access to all records related to this grant must be retained for no fewer than three (3) years following December 31, 2025, and which may be made available to ArtsWave and their financial auditors.

**Key Dates**

Grant Overview Session	Grant Writing Workshops	Application Deadline *	Funding Decision	Final Report Due
December 17, 2024	December 18, 2024 & January 3, 2025	January 15, 2025	February 2025	December 31, 2025

**\* application closes at 5pm on the deadline date**

**Contact ArtsWave**

Additional application questions may be directed to Lori Burkhardt, Grant Programs Manager at [lori.burkhardt@artswave.org](mailto:lori.burkhardt@artswave.org).

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## Appendix A: Blueprint for Collective Action

**Our Vision – A more vibrant regional economy and more connected community for all.**

### Overview

By supporting a wide variety of art forms and providing strategic leadership for the arts sector in the broader community, ArtsWave creates an environment where the growing impact of the arts is felt and celebrated by the entire community.

The Blueprint for Collective Action provides a focus for ArtsWave's community investments and strategic initiatives for the next ten years. The Blueprint is designed to achieve three things:

- Align with broader community objectives;
- Provide more clarity and specificity around the kinds of activities and outcomes ArtsWave desires; and
- Leverage more support from the community by demonstrating relevance to the community.

By focusing the ArtWave's investment strategy, the Blueprint is intended to stake a bold vision for the region for enhanced impact through the arts by establishing five community goals and creating a roadmap for their achievement.

### Blueprint Goals and Roles

The Blueprint is based on the following principles:

- All goals have equal priority.
- Every arts organization plays a part in achieving our collective goals through a wide variety of activities and programs that create community impact – some new, many already established.
- Individual arts organizations (of any size or discipline) can play specific roles in support of the achievement of each goal.
- No single arts organization can fulfill all roles for all goals all the time. A diverse arts community supporting many different types of organizations and activities is necessary to fulfill all roles and achieve all goals.
- A single activity or program may fulfill several roles and may advance progress on more than one goal.
- ArtsWave, too, has specific roles to play in the achievement of each goal. ArtsWave must leverage its position as leader, connector, aggregator, and partner to build capacities sector-wide.

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## Arts Put Cincinnati on the Map

Greater Cincinnati's innovative arts scene attracts talent, visitors, and business to the region.

**GOAL: To be a more competitive region for talent attraction by leveraging arts that are perceived as extraordinary**

### Roles for Arts Organizations:

- To design new or unexpected artistic collaborations
- To create arts experiences that are active, immersive, and social; and that stretch the boundaries of the art form
- To improve and employ digital capabilities and use of social media to reach and engage digitally oriented or remote audiences
- To participate in collaborative efforts to increase earned media and leverage paid media/marketing opportunities
- To develop and share stories that distinguish the region through its arts

## Arts Deepen Roots in the Region

Residents who are engaged in the arts – whether as volunteers, artists, or audience members – have a stronger and more positive connection to the community.

**GOAL: To deepen feelings of engagement and connection to the community by widening participation in arts experiences, especially those that resonate with adults age 40 and under**

### Roles for Arts Organizations:

- To create arts experiences that are participatory, social, recurring, and encourage personal investment in the organization and/or community
- To create arts experiences for college students and young professionals
- To develop partnerships and collaborations with local colleges and universities
- To involve college students and young professionals at all levels of organizational decision-making

## Arts Bridge Cultural Divides

When the arts reflect and celebrate the diversity of our community, residents build a greater understanding and appreciation of cultural differences.

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**GOAL: To promote cross cultural understanding by increasing the availability and accessibility of arts experiences that include and represent all races and ethnicities**

**Roles for Arts Organizations:**

- To present works of art created by artists of all races and ethnicities
- To create arts experiences that include artists of all races and ethnicities
- To create and/or present art that tells the story(ies) of all races and ethnicities
- To create shared arts experiences for people of all races and ethnicities
- To identify and establish partnerships and collaborations that support equitable access to arts experiences for people of all races and ethnicities
- To involve at all levels of organizational decision-making people who reflect the broadest possible racial and ethnic diversity
- To develop cross-cultural artistic partnerships and collaborations

### Arts Enliven Neighborhoods

Community arts centers, galleries, and theaters serve as vital hubs for neighborhood activity that supports local business and builds civic pride.

**GOAL: To enhance the vibrancy of neighborhoods, particularly those that are underserved and/or revitalizing, by increasing the availability and accessibility of arts organizations and opportunities**

**Roles for Arts Organizations:**

- To establish partnerships and collaborations within the neighborhood in which the organization is physically located
- To create an environment where all members of the organization's surrounding neighborhood feel welcome
- To increase the variety and frequency of arts experiences embedded in or accessible to neighborhoods throughout the region
- To improve the aesthetics of the region's neighborhoods
- To enliven indoor and outdoor public spaces throughout the region with arts experiences
- To optimize the use of resources already present in neighborhoods throughout the region to support equitable access to arts experiences

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- To improve and employ digital capabilities and use of social media to reach and engage neighborhoods

## Arts Fuel Creativity and Learning

The arts have the power to transform education both by improving learning of core curriculum and teaching skills like creativity, collaboration, and critical thinking.

**GOAL: To promote the development of 21st century skills by ensuring that all children in the region, particularly those that are underserved, have access to multiple arts opportunities**

### Roles for Arts Organizations:

- To provide meaningful arts education opportunities for youth at all grade levels
- To optimize the use of resources already present in school and community settings to support equitable access for youth to meaningful arts education opportunities
- To provide professional development and enrichment opportunities for arts educators
- To develop curricula, materials, and training to support arts integration in all subjects and at all grade levels

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## Appendix B: Grant Application Glossary

### **Artistic Excellence**

The quality of the artists and other key individuals, creative process, works of art, organizations, arts education providers, artistic partners, and/or services involved in the project and their relevance to the audience or communities the project aims to serve.

### **Artistic Merit**

The value and appropriateness of the project to the organization's mission, artistic field, artists, audience, community, and/or constituency. The ability to carry out the project based on such factors as the appropriateness of the budget, clarity of the project activities, resources involved, and the qualifications of the project's personnel and/or partnerships. Clearly defined goals and/or proposed outcomes and an appropriate plan to determine if those goals and/or outcomes are met. Evidence of direct compensation to artists, art collectives, and/or art workers. May also include, as applicable, engagement with individuals whose opportunities to experience the arts are limited by geography, race or ethnicity, economics, or disability, and the ability to strengthen the arts sector through knowledge-sharing and resources.

### **501(c)3 Status**

A non-profit organization that has been approved by the Internal Revenue Service as a tax-exempt, charitable organization.

### **Non-Profit in Nature**

An organization, group or individual artist whose programming are organized for purposes other than generating profit (such as to benefit a community or communities) but are without a 501(c)3 status.

### **Fiscal Agent**

A fiscal agent is a non-profit organization that holds the tax-exempt status as granted by the Internal Revenue Service under code 501(c)3 and that agrees to act on behalf of an individual or organization that does not yet have tax exemption for the purposes of this grant process.

### **Cincinnati-Middletown, OH-KY-IN MSA**

The Cincinnati-Middletown, OH-KY-IN MSA includes the following counties: Brown, Butler, Clermont, Hamilton, and Warren Counties in Ohio; Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton Counties in Kentucky; and Dearborn, Ohio, and Union Counties in Indiana.

### **BIPOC**

Black, Indigenous and People of Color "We use the term BIPOC to highlight the unique relationship to whiteness that Indigenous and Black people have, which shapes the experiences of and relationship to white supremacy for all people of color within a U.S. context." We take this explanation and practice from the BIPOC Project.

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## **Project**

A project is defined as a specific, connected set of activities with a start date, end date, and explicit objectives and outcomes. Projects with multiple components and/or event dates must show a cohesive theme that ties the entire project together.

## **New Project**

A project that has not occurred before and/or has not received ArtsWave funding before.

## **Existing Project**

A project that has occurred before (this may include projects that have OR have not received ArtsWave funding before).

## **New or Expanded Audience**

Demonstrated project expansion through serving a new or expanded audience, such as an age group, a racially or culturally specific group, etc.

## **New or Expanded Geography**

Demonstrated project expansion through serving a new or expanding geography, such as a school district, neighborhood, municipality, county, etc.

## **Other Expansion**

Demonstrated project expansion through deepened impact, such as expanded themes, content, or timeframe.

## **Estimated Total Participation – Adults**

The estimated number of persons aged 19+ years that will be reached through this project.

## **Estimated Total Participation – Youth**

The estimated number of persons aged 0-18 years that will be reached through this project.

## **Objective**

An objective defines the specific, measurable actions your organization must take to achieve successful outcomes.

## **Outcome**

An outcome defines changes that have taken place because of your organization's work (i.e. results or impact). Outcomes help you answer the question, "so what?".

## **Annual Operating Budget**

The annual operating budget should be based on a realistic projection of income for the current year. This should reflect an organization's entire operations, not just the project budget.

## **Financial Summary**

A financial document (called: profit and loss, statement of activities, or income and expense statement) from your organization's most recently completed fiscal year.

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## Appendix C: National Policy and Other Legal Requirements, Statutes, and Regulations that Govern Your Award

You must ensure that the funded project is implemented in full accordance with the U.S. Constitution, federal law, and public policy requirements: including, but not limited to, those protecting free speech, religious liberty, public welfare, the environment, and prohibiting discrimination (2 CFR 200.300).

As a registrant with SAM.gov, in most cases, you have already self-certified to the "Financial Assistance General Certifications and Representations," including attesting to the accuracy of the certification and acknowledging that you may be subjected to criminal prosecution under Section 1001, Title 18 USC, or civil liability under the False Claims Act if you have misrepresented the information. A copy of this Financial Assistance Certifications Report is available in your SAM.gov entity registration record.

### 1. Nondiscrimination Policies

As a condition of receipt of federal financial assistance, you acknowledge and agree to execute your project, and require any contractors, successors, transferees, and assignees to comply with applicable provisions of national laws and policies prohibiting discrimination, including but not limited to:

1.a Title VI of the Civil Rights Act of 1964, as amended, and implemented by the National Endowment for the Arts at 45 USC 1110, provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance. Title VI also extends protection to persons with limited English proficiency (42 USC 2000d et seq.)

1.b As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps to ensure that LEP persons have meaningful access to your programs. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. You are encouraged to consider the need for language services for LEP persons in conducting your programs and activities. For assistance and information go to [www.arts.gov/foia/reading-room/nea-limited-english-proficiency-policy-guidance](http://www.arts.gov/foia/reading-room/nea-limited-english-proficiency-policy-guidance).

1.c Title IX of the Education Amendments of 1972, as amended, provides that no person in the United States shall, on the basis of sex, be excluded from participation in, be denied benefits of, or be subject to discrimination under any education program or activity receiving federal financial assistance (20 USC 1681 et seq.)

1.d The Age Discrimination Act of 1975, as amended, provides that no person in the



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United States shall, on the basis of age, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance (42 USC 6101 et seq.)

- 1.e The Americans with Disabilities Act of 1990 (ADA), as amended, prohibits discrimination on the basis of disability in employment (Title I); State and local government services (Title II); and places of public accommodation and commercial facilities (Title III) (42 USC 12101-12213).
- 1.f Section 504 of the Rehabilitation Act of 1973, as amended, provides that no otherwise qualified individual with a disability in the United States shall, solely by reason of his/her disability, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance (29 USC 794).

Access should be integrated into all facets and activities of an organization, from day to day operations to long range goals and objectives. Access accommodations and services should be given a high priority and funds should be available for these services. All organizations are legally required to provide reasonable and necessary accommodations for staff and visitors with disabilities.

#### Section 504 - Self-Evaluation and Additional Resources

- i. A Section 504 self-evaluation *must* be on file at your organization. To help your organization evaluate its programs, activities, and facilities with regard to Section 504 accessibility requirements, the Civil Rights Office has a *Section 504 Self Evaluation Workbook* available on our website.
  - ii. You should designate a staff member to serve as a 504 Coordinator. The completed workbook or similar compliance and supporting documentation should be kept on file for a period of three (3) years from the date the Federal Financial Report (FFR) is filed, and made available to the public and the NEA upon request. The NEA may request the 504 Workbook or your compliance documents for various potential scenarios including an Inspector General audit and/or civil rights investigation.
  - iii. *Design for Accessibility: A Cultural Administrator's Handbook* provides guidance on making access an integral part of an organization's staffing, mission, budget, and programs. This Handbook and other resources may be downloaded from the NEA website. If you have questions, contact the Office of Accessibility at [accessibility@arts.gov](mailto:accessibility@arts.gov); (202) 682-5532; FAX (202) 682-5715; or TTY (202) 682-5496.
2. Environmental and Preservation Policies
    - 2.a The National Environmental Policy Act of 1969, as amended, applies to any federal funds that would support an activity that may have environmental implications. We may ask you to respond to specific questions or provide additional information in accordance with the Act. If there are environmental implications, we will determine whether a categorical exclusion may apply; to

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undertake an environmental assessment; or to issue a "finding of no significant impact," pursuant to applicable regulations and 42 USC Sec. 4332.

- 2.b The National Historic Preservation Act of 1966, as amended, applies to any federal funds that support activities that have the potential to impact any structure eligible for or on the National Register of Historic Places, adjacent to a structure that is eligible for or on the National Register of Historic Places, or located in a historic district, in accordance with Section 106. This also applies to planning activities that may affect historic properties or districts. We will conduct a review of your project activities, as appropriate, to determine the impact of your project activities on the structure or any affected properties. Agency review must be completed prior to any agency funds being released. You may be asked to provide additional information on your project to ensure compliance with the Act at any time during your award period (16 USC 470).

### Other National Policies

3. Debarment and Suspension. You must comply with requirements regarding debarment and suspension in Subpart C of 2 CFR Part 180, as adopted by the NEA in 2 CFR 3254.10.

There are circumstances under which we may receive information concerning your fitness to carry out a project and administer federal funds, such as:

- i. Conviction of, or a civil judgment for, the commission of fraud, embezzlement, theft, forgery, or making false statements;
- ii. Any other offense indicating a lack of business integrity or business honesty that seriously and directly affects your present responsibility;
- iii. Any other cause of so serious or compelling a nature that it affects an organization's present responsibility.

In these circumstances, we may need to act quickly to protect the interest of the government by suspending your funding while we undertake an investigation of the specific facts. We may coordinate our suspension actions with other federal agencies that have an interest in our findings. A suspension may result in your debarment from receiving federal funding government-wide for up to three (3) years.

4. The Drug Free Workplace Act requires you to publish a statement about your drug-free workplace program. You must give a copy of this statement to each employee (including consultants and temporary personnel) who will be involved in award-supported activities at any site where these activities will be carried out.

You must maintain on file the place(s) where work is being performed under this award (i.e., street address, city, state, and zip code). You must notify the NEA Office of Grants Management of any employee convicted of a violation of a criminal drug statute that occurs in the workplace (41 USC 701 et seq. and 2 CFR Part 3256).

5. Lobbying. You may not conduct political lobbying, as defined in the statutes and

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regulations listed below, within your federally-supported project. In addition, you may not use federal funds for lobbying specifically to obtain awards. For definitions and other information on these restrictions, refer to the following:

5.1 No part of the money appropriated by any enactment of Congress shall, in the absence of express authorization by Congress, be used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a Member of Congress, a jurisdiction, or an official of any government, to favor, adopt, or oppose, by vote or otherwise, any legislation, law, ratification, policy, or appropriation, whether before or after the introduction of any bill, measure, or resolution proposing such legislation, law, ratification, policy, or appropriation; but this shall not prevent officers or employees of the United States or of its departments or agencies from communicating to any such Member or official, at his request, or to Congress or such official, through the proper official channels, requests for any legislation, law, ratification, policy, or appropriations which they deem necessary for the efficient conduct of the public business, or from making any communication whose prohibition by this section might, in the opinion of the Attorney General, violate the Constitution or interfere with the conduct of foreign policy, counter-intelligence, intelligence, or national security activities (18 USC 1913).

5.2 Lobbying (2 CFR 200.450) describes the cost of certain influencing activities associated with obtaining grants, contracts, cooperative agreements, or loans as an unallowable project cost. The regulation generally defines lobbying as conduct intended to influence the outcome of elections or to influence elected officials regarding pending legislation, either directly or through specific lobbying appeals to the public.

5.3 Certification Regarding Lobbying to Obtain Awards. Section 319 of Public Law 101-121, codified at 31 USC 1352, prohibits the use of federal funds in lobbying members and employees of Congress, as well as employees of federal agencies, with respect to the award or amendment of any federal grant, cooperative agreement, contract, or loan. While non-federal funds may be used for such activities, they may not be included in your project budget, and their use must be disclosed to the awarding federal agency. Disclosure of lobbying activities by long-term employees (employed or expected to be employed for more than 130 days) is, however, not required. In addition, the law exempts from definition of lobbying certain professional and technical services by applicants and awardees.

6. Davis-Bacon and Related Acts (DBRA), as amended, requires that each contract over \$2,000 to which the United States is a party for the construction, alteration, or repair of public buildings or public works (these activities include, but are not limited to, painting, decorating, altering, remodeling, installing pieces fabricated off-site, and furnishing supplies or equipment for a work-site) must contain a clause setting forth the minimum wages to be paid to laborers and mechanics employed under the contract. Under the provisions of DBRA, contractors or their subcontractors must pay workers who qualify under DBRA no less than the locally prevailing wages and fringe benefits paid on projects of a similar character.

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Information about the laborers and projects that fall under DBRA can be found in the U.S. Department of Labor's Compliance Guide at [www.dol.gov/compliance/guide/dbra.htm](http://www.dol.gov/compliance/guide/dbra.htm). DBRA wage determinations are to be used in accordance with the provisions of Regulations, 29 CFR Part 1, Part 3, and Part 5, and with DOL's Compliance Guide. The provisions of DBRA apply within the 50 states, territories, protectorates, and Native American nations (if the labor is completed by non-tribal laborers).

7. The Native American Graves Protection and Repatriation Act of 1990 applies to any organization that controls or possesses Native American human remains and associated funerary objects and receives federal funding, even for a purpose unrelated to the Act (25 USC 3001 et seq.).

8. U.S. Constitution Education Program. Educational institutions (including but not limited to "local educational agencies" and "institutions of higher education") receiving federal funds from any agency are required to provide an educational program on the U.S. Constitution on September 17 (P.L. 108-447, Division J, Sec. 111(b)). For more information on how to implement this requirement and suggested resources, see [www.ed.gov/policy/fund/guid/constitutionday](http://www.ed.gov/policy/fund/guid/constitutionday) and <http://thomas.loc.gov/teachers/constitution.html>.

9. Prohibition on use of funds to ACORN or its subsidiaries. None of the federal or cost share/matching funds expended for your awarded project may be distributed to the Association of Community Organizations for Reform Now (ACORN) or its subsidiaries (P.L. 111-88 Sec. 427).