

SUPPORTING STATEMENT

National Historical Publications and Records Commission Grant Program OMB Control No. 3095-0013

- 1. Circumstances Making the Collection of Information Necessary.** The National Historical Publications and Records Commission's grant program provides funding to nonprofit organizations and institutions, state and local government agencies, federally acknowledged or state-recognized Native American tribes or groups, and individuals for projects relating to records that further an understanding and appreciation of American history. Grants are made for the preparation and publication of historical documentary editions, archival preservation and planning projects, projects to increase the accessibility of historical records, and projects to improve the ability of institutions and individuals to care for and make historical records available for use, including educational programs and fellowships.

To fulfill its broad mandate, the Commission must ensure the most effective use of the very limited funds available for grants to preserve the nation's documentary heritage. (Our appropriation for fiscal year 2008 was \$7.5 million.) This requires a careful analysis of the proposed costs of each grant project in relation to the project's stated goals and objectives, and in relation to other proposals for similar work.

Information from applicants in the form of a grant application is needed in order for applicants to be eligible for consideration and to provide a basis for determining whether a grant should be awarded. In addition, compliance with the Government Performance and Results Act of 1993 requires that the NHPRC identify quantifiable performance objectives and report the percentage of grants that produce the results promised in grant applications approved by the Commission. Copies of 44 U.S.C. Chapter 25 and amendments, which authorize the Commission's grant program, and 36 CFR Part 1206, which contains the information collection requirement, are attached.

- 2. Purpose and Use of the Information.** In deciding whether to award a grant, the Commission and NARA need information from the applicant in order to determine if the applicant and its proposed project are eligible and whether the proposed project is methodologically sound and suitable for support. The information is reviewed by Commission and NARA staff, State Historical Records Advisory Boards, expert reviewers, and Commission members, in making decisions to award the grants. Financial information is used to make electronic payments to grantees.

The NHPRC has found that Standard Form 424A, Budget Information - Non-Construction Programs, does not provide the level of detail necessary for this purpose, and therefore uses NA Form 17001, Budget Form, as part of its grant application.

There are many reasons why it is important for grant applicants to the National Historical Publications and Records Commission to use NA Form 17001 for their project budgets rather than the standard Federal budget form, 424A. The chief reason is that individual line items in the project budgets, rather than object class categories as a whole, are evaluated during the decision-making process in terms of whether they are essential to accomplish the

work of the project. The Commission's appropriation level does not permit it to provide full funding to many of the projects that it supports, while in a few cases the amount of funding offered may be slightly increased over what is outlined in the proposal budget to ensure accomplishment of project goals. In making these decisions, rather than simply reducing or increasing funding a certain percentage or arbitrary amount from the total requested, the Commission examines individual items requested in relation to the total project work, as well as other funding available to the grantee. The Commission believes that this results in a more cost-effective use of tax dollars than simply awarding full funding or arbitrarily altered funding, and leads to greater accountability on the part of the Commission and its grantees, as well as serving as a check on fraud, waste, and abuse.

3. **Use of Information Technology and Burden Reduction.** Our grant opportunities and grant application packages are posted to Grants.gov and on our web site at www.archives/nhprc.
4. **Efforts to Identify Duplication and Use of Similar Information.** There is no duplication of this information.
5. **Impact on Small Businesses or Other Small Entities.** We have attempted to minimize the burden on all respondents, including small entities.
6. **Consequences of Collecting the Information Less Frequently.** The information is to be collected only when the applicant requests grant funding. It cannot be collected less frequently since NARA and the Commission must review the individual application for each request. Modifications to the Budget Form are requested only if changes are made to the amount requested by the grantee, or a change in the amount awarded deems it necessary.
7. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.** None. All applicants apply through Grants.gov.
8. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.** A notice was published in the Federal Register on November 20, 2008 (73 FR 70383 and 70384), soliciting comments on the information collection prior to submission to OMB. No comments were received. In addition, informal comments are sometimes received from applicants and grantees and are noted by Commission staff for use in future revisions of the information collection.
9. **Explanation of Any Payment or Gift to Respondents.** No payments or gifts are provided to the respondents.
10. **Assurance of Confidentiality Provided to Respondents.** There is no stated assurance of confidentiality provided to respondents.
11. **Justification for Sensitive Questions.** No questions of a sensitive nature are asked.
12. **Estimates of Hour Burden Including Annualized Hourly Costs.** The estimated annual hour burden on individual respondents is 54, which is the time needed for the project director

to gather information and submit the application through Grants.gov. Approximately 100 grantees among the applicant respondents also will submit semiannual narrative reports, for an additional hour burden of two hours for each report from those respondents. Based on an average number of 148 proposals submitted each year, the estimated total annual hour burden is 8,392 hours.

The estimated annual cost to each applicant is \$1,944. The cost includes 54 hours of effort by the project director to gather information and submit the application (at \$36 per hour). Approximately 100 grantees among the applicant respondents also will submit semiannual narrative reports, for an estimated annual cost of \$144. This is based on 4 hours (2 hours each for two reports a year) of the project director's time to prepare and fax or email the reports to us.

13. Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers.

Applicants are not required to develop or maintain any operating systems solely for the NHPRC grant; therefore, no cost burden has been developed other than that enumerated in Item 12.

14. Annualized Cost to the Federal Government. The estimated annual cost to the Federal Government is \$198,000 for administering the grant application process, or \$1,338 per application submitted. Approximately \$130,000 of that cost goes to maintain the systems that enable applicants to apply electronically through Grants.gov. The rest of the cost is based on an estimate of the time spent by Commission staff members reviewing the application, soliciting reviews from expert reviewers and State Historical Records Advisory Boards, receiving and processing reviewers' and board evaluations, and providing information to the Commission to assist in its evaluation of the proposal (10 hours per application). This cost also includes printing and copying costs. The estimated annual cost to the Federal Government for the review of narrative reports is approximately \$86, based on one hour of a program officer's time (GS-12s and 13s @ \$39 to \$47 per hour) to review each report (2 per year).

15. Explanation for Program Changes or Adjustments. Changes are due to normal salary increases and actual numbers of applications submitted over a 3-year period.

16. Plans for Tabulation and Publication and Project Time Schedule. The results of this collection of information will not be published.

17. Reason(s) Display of OMB Expiration Date is Inappropriate. The expiration date will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions. There are no exceptions to the certification statement identified in Item 19 of OMB 83-I.