

## Supporting Statement

### Extension of the Generic Clearance Authority for the National Endowment for the Humanities OMB Control Number 3136-0134

#### A. Justification

1. In his letter to Sally Katzen, Office of Information and Regulatory Affairs, Office of Management and Budget dated February 3, 1994, Sheldon Hackney, then Chairman of the National Endowment for the Humanities (NEH), requested that the authority for reviewing and approving some agency information collection requests under the Paperwork Reduction Act be delegated to NEH. On July 7, 1994, OMB approved a generic clearance authority for all NEH collections of information, excluding surveys, evaluations or other data calls used for policy-making purposes. On July 18, 1997, June 1, 2000, June 24, 2003, June 8, 2006, June 22, 2009, July 17, 2012, and June 19, 2015. OMB approved three-year extensions of the generic clearance authority. **This submission requests that NEH again be granted a three year extension of the existing generic clearance authority.**
2. Prior to fiscal year 1996, before a 36% cut in funding, NEH had 39 information collection instruments covered under the generic clearance authority. At the time of NEH's last extension request in 2009, NEH had only nineteen information collection instruments covered under the generic clearance authority. Currently, NEH has only thirteen information collection instruments covered under the generic clearance authority.  
  
Seven of the thirteen collections are guidelines and application instructions for NEH's grant programs. Each of the seven guidelines and application instructions collections consist of a description of what types of projects are funded under the particular grant program and the instructions necessary to submit an application via Grants.gov. Five of the thirteen collections are instructions used by NEH grantees to submit financial and performance reports, and the remaining collection is a form used in the NEH peer review process.
3. NEH has attained the goal of 100 percent electronic collection of information. Currently, applicants can download all guidelines for funding opportunities from both the NEH website located at <http://www.neh.gov/> or Grants.gov <http://www.grants.gov/>. All of NEH's grant applications are now being collected electronically via Grants.gov. All reporting instructions are available on the NEH website, and all reports are submitted electronically by grantees via the NEH's electronic grant management system, "eGMS".
4. Duplication is avoided since all NEH grant application guidelines and publications are reviewed through an internal clearance process which requires review by several different offices and divisions of the agency, including the Office of the General Counsel.
5. Individuals or small organizations are the primary applicants to many of NEH's grant

programs. Every effort has been made to streamline the application instructions and to simplify the entire application process. The agency's internal clearance process ensures that no undue burden is placed on any applicant for NEH funding.

6. At the time of this submission in 1994, NEH grant programs normally had application deadlines twice a year. In the fall of 1995, NEH's funding and staff were reduced by 36%, which meant that NEH was forced to reduce application deadlines for most programs to once a year. This is still true for the majority of NEH's grant programs.
7. None of the listed conditions apply, with the exception of number three, requiring respondents to submit more than an original and two copies of any document. OMB has allowed NEH an exception to the three copy limit in order to accommodate the peer review process. While in the past it was necessary to require applicants to submit multiple copies of each application, now with the advent of electronic application, applicants submit one application electronically via Grants.gov. The burden is now on the agency to duplicate the application. However, there is still some supporting documentation for grant applications that cannot yet be collected electronically that NEH still requires for distribution to outside reviewers or panelists. An example of this would be in our Media Program, which requires copies of sample or pilot films and digital samples. Applicants are still required to mail these in to the NEH. Accordingly, OMB agreed that NEH could request from applicants three copies for internal agency use and one copy for each reviewer and panelist. (The number of reviewers and panelists varies from program to program.) NEH has strictly adhered to this policy and will continue to do so in the future. Please note also that these samples are returned to applicants after the review process if they provide NEH with a self-addressed envelope.
8. On February 14, 2018 and April 25, 2018 NEH published notices in the Federal Register which solicited comments from the public on this proposed information collection. **(See PDF documents attached to electronic submission.)** One comment was received from the first notice.

Every program of the NEH assembles panels of experts during each review cycle to review proposals submitted to the program for funding. The panelists are consulted by NEH staff regarding the clarity and value of the guidelines under which they have judged the proposal. The panel also informally comments on the burden of response required by applicants. NEH also notes and evaluates other suggestions for revising guidelines received from applicants responding to the invitation for comments found in the burden statement contained in each information collection. Efforts are continually being made to shorten and simplify application instructions in response to suggestions made by respondents.

The public also has the opportunity to comment on guidelines at special presentations by staff of NEH grant programs at the annual meetings of NEH customers such as the Modern Language Association, the Organization of American Historians, the American Historical Association, and the PBS Program Fair.

9. No payments or gifts are provided to any of the respondents.

10. All NEH guidelines and application instructions contain a notice furnished in compliance with the Privacy Act.
11. No information on sexual behavior, religious beliefs, or other personal matters is solicited.
12. The estimate of the **hour burden for the thirteen collections of information** included in the NEH's generic clearance authority is **88,885 hours**. We have based this estimate on **7,815 responses** from applicants, grantees and panelists/reviewers. The hours per response varies among the thirteen collections from thirty minutes for a grantee to fill out a form certifying gifts collected to release NEH matching funds, to a maximum of fifteen hours for an applicant to prepare an application for funding. Each collection of information contains the required burden statement which estimates the time to complete. These estimates were originally made by NEH staff in consultation with respondents. They have been revised over the years to what we believe are accurate estimates of the number of hours it takes to fill out a form or prepare an application.

The total burden hours is substantially reduced from the 327,596 hours reported in 1994.

The annualized cost to the respondents is estimated at \$6,004,182 (up only slightly from \$5,896,728 in 1994) despite the increase in the average wage of respondents since 1994. Currently the agency has estimated that the total annual reporting hours by respondents is 88,885. The average wage of respondents has been recalculated and has slightly increased since our last submission, and is estimated at \$67.55 (formerly \$62.23).

13. See response to 12. above. The cost estimate is based solely on the cost of the respondent's time to complete the information collection. The two cost components, total capital/start-up and operation/maintenance/purchase of services are not applicable.
14. The annualized cost to the Endowment is estimated at \$2,111,613. (This figure is down from \$5,313,960 reported in 1994.) Currently the agency has calculated that 7,815 responses are made per year to the thirteen information collection requests. Approximately four hours are spent by NEH staff reviewing and processing each response at an average hourly wage of \$67.55. (7,815 responses x 4 hours x \$67.55)
15. The change is an adjustment, which is a result of the increase in the number of responses to NEH collections of information, attributable to the increase in number of applicants to NEH grant programs.
16. N/A
17. N/A
18. N/A

#### B. Collections of Information Employing Statistical Methods

None of the agency's collections of information employ statistical methods.\