

SUPPORTING STATEMENT

National Historical Publications and Records Commission (NHPRC) Grant Program NA Form 17001, NHPRC Budget Form and Instructions and NA Form 17001a, NHPRC Grant Offer Acknowledgement 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 2014 was \$4.5 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 grant budget and related documents is needed in order for applicants to be eligible for consideration and to provide a basis for determining whether a grant should be awarded. 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.

In May 2016, NARA submitted a Change Worksheet to add NA Form 17001a. After the Archivist of the United States, as chair of the Commission, recommends a grant for approval, the prospective grantee must acknowledge the offer of the grant and agree to meet the requirements of applicable Federal regulations. In addition, they must verify the existence of an indirect cost agreement with a cognizant Federal agency if they are claiming indirect costs in the project's budget. This is done on NA Form NA17001a.

- 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. Much of this information comes in narrative sections of the grant that applicants learn about in postings on NHPRC's announcements on Grants.Gov. 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.

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, NHPRC Budget Form and Instructions, 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 NHPRC Budget Form and Instructions 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 April 10, 2018 (83 FR 15410), soliciting comments on the information collection prior to submission to OMB. No comment(s) 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 to prepare the budget form, NA17001 is 10, which is the time needed for the project director and other staff to gather budget information related to an application. Based on an average number of 144 proposals submitted each year, the estimated total annual hour burden is 1,440 hours.

The estimated annual cost to each applicant is \$360. The cost includes 10 hours of effort by the project director and other staff to gather information and submit the application (at \$36 per hour). In addition, approximately a third of grant recipients (an average of 25 a year) need to revise their grant budget which requires 5 hours of effort by the project director and other staff. This adds an estimated hour burden of 125; and an estimated annual cost of \$180, bringing the annual hour burden to 1,565.

The estimated annual cost to each grant offer recipient is \$72. This cost includes the 2 hours of effort to complete and submit the NHPRC Grant Offer Acknowledgement, NA Form 17001a (at \$36 per hour). Approximately 100 institutions are offered grants each; the hour burden is 200 hours. Adding this 200 hours with the 1,565 hours listed above, the grand total hour burden is 1,765.

- 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 \$12,400 for reviewing application budgets administering the grant application process, or \$86 per application submitted, based on two hours of a program officer's time (GS-12s and 13s @ \$39 to \$47 per hour) to review each budget and summarize it for the Commission report (2 per year). In addition, program officers take one hour to review revised budgets, for an annual cost of \$6,200. The estimated annual cost to the Federal government is \$1,075 for reviewing offer acknowledgements, based on 15 minutes of a program officer's time (GS-12s and 13s @ \$39 to \$47 per hour).
- 15. Explanation for program changes or adjustments.** There is a modest increase due to adding NA Form 17001a, NHPRC Grant Office Acknowledgement, used by an additional 100 institutions.
- 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.