

## 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, and Federally acknowledged or state-recognized Native American tribes or groups, for projects relating to records that further an understanding and appreciation of American history. We issue grants for preparing and publishing historical documentary editions, archival preservation and planning projects, projects increasing accessibility of historical records, and projects improving 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 2021 was \$6.5 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.

We need the information from applicants requested in the grant budget form (NA Form 17001) and related documents to determine that applicants are eligible for consideration and to determine whether we should award a grant. 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 addition, we need the information recipients provide in 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 17001a.

2. **Purpose and use of the information.** In deciding whether to award a grant, the we need information from the applicant 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. We review the information, along with state historical records advisory boards, expert reviewers, and Commission members, in making decisions to award the grants.

We have found that Standard Form 424A, Budget Information - Non-Construction Programs, does not provide the level of detail necessary for this purpose, and therefore we use NA Form 17001, NHPRC Budget Form and Instructions, as part of our grant application process.

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 we evaluate individual line items in the project budgets, rather than object class categories as a whole, during the decision-making process, in terms of assessing whether they are essential to accomplish the work of the project. Our appropriation level does not permit us to provide full funding to many of the projects that we support, while in a few cases the amount of funding offered may be slightly increased over what is outlined in the proposal budget to ensure the grantee can accomplish project goals. In making these decisions, rather than simply reducing or increasing funding a certain percentage or arbitrary amount from the total requested, we examine individual items requested in relation to the total project work, as well as other funding available to the grantee. We believe 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](http://www.archives/nhprc).
4. **Efforts to identify duplication and use of similar information.** This information does not duplicate similar information.
5. **Impact on small businesses or other small entities.** We have attempted to minimize the burden on all respondents, including small entities. In addition, this collection does not have a significant impact on small businesses.
6. **Consequences of collecting the information less frequently.** The information cannot be collected less frequently because the applicants initiate the collection and they determine whether and how often they request grant funding. We also cannot collect it less frequently because we must review the individual grant application for each request. We also do not request that they modify their budget submissions unless the requestee changes the amount they are requesting, or if a change in the amount we award from their initial request necessitates it.
7. **Special circumstances relating to the guidelines of 5 CFR 1320.5.** This information collection complies with 5 CFR 1320.5. All applicants apply through grants.gov.
8. **Comments in response to the *Federal Register* notice and efforts to consult outside agency.** No formal consultations have taken place with regard to the information collection itself. However, we regularly consult with state historical records advisory boards, expert reviewers, and Commission members on the grant application and award processes, forms, requirements, etc., and make efforts to streamline the process as much as possible in response. We also published a notice of this information collection in the *Federal Register* on May 7, 2021 (86 FR 24670), requesting public comments. We received no comments. In addition, we also sometimes receive informal comments from applicants and grantees that we use in future revisions of the information collection.
9. **Explanation of any payment or gift to respondents.** This information collection involves no payments or gifts to respondents.
10. **Assurance of confidentiality provided to respondents.** We do not assure respondents of confidentiality for information they provide under this collection.

**11. Justification for sensitive questions.** We do not ask any questions of a sensitive nature.

**12. Estimates of hour burden including annualized hourly costs.** We estimate the annual hour burden on individual respondents to be between 10-17 hours. If they submit an application, it is about ten hours; if they are a recipient, they may be among the 1/3 of recipients who need to revise their budget documents, adding about five hours, and they will also need to complete the offer acknowledgement form, adding another two hours. The total annual estimate for all respondents would be between 1,440-1,765. The numbers are broken out in the following table:

<i>Type of Respondent and activity</i>	<i>Average number of respondents per year</i>	<i>Responses per respondent per year</i>	<i>Hours per response</i>	<i>Annual hour burden (all respondents)</i>	<i>Est. cost per hour</i>	<i>Annual hour cost per applicant</i>
Applicants: Gather info and prepare budget form, NA Form 17001	144	1	10	1,440	\$36 (average for project director and staff)	\$360
Recipients (1/3): Revise budget	25		5	125		\$180
Recipients (all): Complete and submit Grant Offer Acknowledgment, NA Form 17001a	100		2	200		\$72

**13. Estimate of other total annual cost burden to respondents or recordkeepers.** We do not require applicants to develop or maintain any operating systems solely for the NHPRC grant; therefore, there is no additional cost burden.

**14. Annualized cost to the Federal Government.** We estimate the annual costs to the Government of handling the information as:

<i>Type of Government cost</i>	<i>Cost per hour</i>	<i>Hours per application</i>	<i>Number of applications</i>	<i>Annual cost</i>
1 Review application budgets and summarize for Commission reports (two per year)	\$39-\$47 (GS-12 and GS-13 grades)	2	144	\$12,400 (based on averaging the salary range)
Review revised budgets		1		\$6,200
Review offer acknowledgements		.15		1,075

15. **Explanation for program changes or adjustments.** There is a no change in burden.
16. **Plans for tabulation and publication and project time schedule.** We do not use the information we collect for statistical studies or publications.
17. **Reason(s) display of OMB expiration date is inappropriate.** We display OMB's approval expiration date on the form.
18. **Exceptions to certification for Paperwork Reduction Act submissions.** We are not requesting any exceptions to the certification statement identified in Item 19 of OMB Form 83-I.