

# NATIONAL ENDOWMENT FOR THE HUMANITIES Extension of the Generic Clearance Authority OMB Control Number 3136-0134 Justification: Supporting Statement A

#### Abstract

The National Endowment for the Humanities (NEH) seeks a three-year renewal of its generic clearance authority, OMB control number 3136-0134. This clearance includes NEH's Notice of Funding Opportunity (NOFO) template, agency-specific application and award-related forms, and agency-specific performance reports.

### **Type of Request**

This is a request for a revision of existing clearance 3136-0134. This request includes additional information collection instruments and an updated burden estimate.

#### 1.) Need for the Collection

The National Endowment for the Humanities' (NEH) primary function is grantmaking, and this clearance authority covers information collections related to this activity. It allows the agency to:

- solicit grant applications from the public,
- recruit peer reviewers from the public,
- process awards, and
- monitor recipient performance.

NEH programs are authorized by <u>20 U.S.C.</u> § <u>956</u>, <u>et seq</u>. Awards are subject to <u>2 CFR Part 200 Uniform Administrative Requirements</u>, <u>Cost Principles</u>, <u>and Audit Requirements for Federal Awards</u>, which governs NEH's application guidelines and award requirements.

### 2.) Information Use

Respondents to these information collections include grant applicants (both organizations and individuals); grant recipients (both organizations and individuals); and individuals volunteering their services as peer reviewers. NEH uses the information it collects from respondents internally and does not disseminate it publicly.

NEH uses information requested in the NOFO and application forms to determine the applicants' eligibility and applications' completeness and responsiveness while ensuring compliance with 2 CFR Part 200 and program requirements. The information collected is the basis of NEH's funding decisions in its discretionary programs.

NEH uses forms completed by recipients at the time of award to confirm eligibility, establish payment schedules (for individuals), and to mitigate risk to the agency.

NEH uses information collected from the reviewer interest form to identify qualified members of the public to serve as peer reviewers as part of the agency's review process.

NEH uses various reporting templates to monitor recipient performance in compliance with relevant governmentwide regulations, agency policy, and program-specific requirements.

In the past, information collections under this clearance have been used to support NEH's grants management line of business. NEH plans to continue such efforts under this revision.

NEH's existing clearance currently covers 27 information collections, and NEH is requesting clearance for 8 additional information collections, all 35 of which are listed below.

Information Collection	Brief Description
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1. Notice of Funding Opportunity	The NEH NOFO template is used for all NEH funding
Template	programs' application guidelines. It follows the format
	and sequence set forth for all federal grantmaking
2. FPIRI Evaluation Form	agencies in Appendix I of 2 CFR 200.
2. FPIRI Evaluation Form	Fellowship Programs at Independent Research
	Institutions (FPIRI) fellows may voluntarily complete this form on the NEH website following their
	fellowships to provide feedback on their fellowship
	experiences.
3. Certification of Matching Gifts	NEH Challenge grant recipients are required to submit
for NEH Challenge Grants	this form annually to document required third-party
101 WEIT Chanenge Grants	cost share.
4. Assurances as to Labor	Applicants with projects including relevant professional
Standards	performers submit this form in Grants.gov Workspace
Standards	at the time of application. It provides written assurance
	that all projects or productions supported by NEH
	funds will follow the standards set forth in 29 CFR Part
	505.
5. NEH Certification of	NEH grant recipients whose projects include federal
Gifts/Pledges	matching funds are required to submit this form to
,	document required third-party cost share.
6. NEH Organizational Survey	New NEH 501(c)(3) grant recipients receiving an award
	greater than \$50,000 complete this intake form with
	information about their organization and its structure
	at the time of award as part of the agency's risk
	management strategy.
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	Note: the term "survey" in this case does not match
	OMB's definition of a form collecting information about
= NEH Complemental Information	a group's opinions or experience.
7. NEH Supplemental Information	Individual applicants complete this form in Grants.gov
for Individuals	Workspace at the time of application. It includes basic
9 Supplementary Cover Chest for	information about the applicant and proposed project.
8. Supplementary Cover Sheet for NEH Grant Programs	Institutional applicants for discretionary programs complete this form in Grants.gov Workspace at the time
NEH GIAIR FIOGIAINS	of application. It includes basic information about the
	applicant and proposed project.
	applicant and proposed project.

9. Supplementary Cover Sheet for	The state and jurisdictional humanities councils
NEH State Councils	complete this form in Grants.gov Workspace at the time
NEH State Councils	of application for their legislatively mandated general
	operating support grants. It includes basic information
A NEU Desellat Class Has France	about the applicant and proposed project.
10. NEH Panelist Sign Up Form	Individuals can voluntarily indicate their interest in
	serving as a peer reviewer for NEH by completing this
27777 1 D	form on the NEH website.
11. NEH Institutional Profile	Applicants to the Preservation Assistance Grants (PAG)
	program complete this form at the time of application in
	Grants.gov Workspace. It provides additional
	information about the applicant and proposed project.
12. NEH Individual Progress	Individual grant recipients complete this report online
Report	in eGMS Reach within 120 days of the period of
	performance end date, consistent with 2 CFR 200.
13. NEH Interim Performance	Organizational award recipients (except those in
Progress Report	programs with a specialized interim report) complete
	this report online and submit it annually, consistent
	with 2 CFR 200.
14. NEH Final Performance	Organizational award recipients (except those in
Progress Report	programs with a specialized final report) complete this
	report online in eGMS Reach within 120 days of the
	period of performance end date, consistent with 2 CFR
	200.
15. Activities and Outcomes	The state and jurisdictional humanities councils
Report for the State Humanities	complete this report annually. It focuses on qualitative
Councils	outcomes related to subawards and other council
	activities made with their formula-based grants.
16. NEH Interim Performance	Challenge Grants recipients complete this report online
Progress Report - Challenge	in eGMS Reach annually, consistent with 2 CFR 200.
Programs	
17. NEH Final Performance	Challenge Grants recipients complete this report online
Progress Report - Challenge	in eGMS Reach within 120 days of the period of
Programs	performance end date, consistent with 2 CFR 200.
18. NEH Individual Programs	Individual applicants complete this form at the time of
Acceptance Form	award to confirm acceptance of their award and finalize
1	their period of performance and payment schedule.
19. State Humanities Council	State humanities council recipients of formula-based
SHARP interim report	SHARP awards complete this report annually in eGMS
F - 1	Reach.
20. State Humanities Council	State humanities council recipients of formula-based
SHARP final report	SHARP awards complete this report at the end of their
	period of performance in eGMS Reach.
21-23. SHARP Subrecipient	These reports (tailored for individual, organizational,
Selection Reports	and subgranting subrecipients) are used by state
Coloction reports	humanities councils and ARP-G recipients to report on
	organizations and individuals selected as subrecipients.
24. Final Performance Report:	PAG recipients complete this report online in eGMS
Preservation Assistance Grants	Reach within 120 days of the period of performance end
1 1 Coci vation 7 constance Grants	date, consistent with 2 CFR 200.
	uate, consistent with 2 CFR 200.

25-27. Performance Reports: Public Humanities Projects (Implementation, Planning, and Humanities Conversations)	Public Humanities Projects recipients complete these program-specific reports online in eGMS Reach within 120 days of the period of performance end date, consistent with 2 CFR 200.
28. Fed/State Supplemental Funding Interim Report (new collection)	State humanities councils that received special initiative supplemental funding will complete this report online in eGMS Reach annually, consistent with 2 CFR 200.
29. Fed/State Supplemental Funding Final Report (new collection)	State humanities councils that received special initiative supplemental funding will complete this report online in eGMS Reach within 120 days of the period of performance end date, consistent with 2 CFR 200.
30. Fed/State Partnership Regrant Report (new collection)	State humanities councils will submit this report to identify organizations and individuals selected as subrecipients.
31. Performance Report: Division of Education Programs (new collection)	Division of Education Programs recipients will complete this report online in eGMS Reach within 120 days of the period of performance end date, consistent with 2 CFR 200.
32. Performance Report: Digital Projects for the Public (new collection)	Digital Projects for the Public recipients will complete this report online in eGMS Reach within 120 days of the period of performance end date, consistent with 2 CFR 200.
33. Performance Report: Media Production (new collection)	Media Projects: Production recipients will complete this report online in eGMS Reach within 120 days of the period of performance end date, consistent with 2 CFR 200.
34. FPIRI Fellowship Data Form (new collection)	This form asks individual participants in NEH-funded FPIRI fellowship programs to report on their experience.
35. FPIRI Financial Report (new collection)	FPIRI recipients will use this form to provide a summary budget for their programs.

## 3.) Information Collection Method

All NEH information collections are conducted online. Applicants submit their applications via Grants.gov and other reports and forms via eGMS, NEH's electronic grants management system. Applicants seeking funding voluntarily respond to the agency's NOFOs, which are found on Grants.gov as well as on the NEH website. NOFOs include information regarding recipients' post-award reporting requirements. Individuals volunteering as peer reviewers submit their credentials via the NEH website. All collections are overseen by NEH staff.

For the majority of NEH's programs, NEH accepts proposals annually, though a few programs have multiple deadlines per year. NEH requires applicants to submit performance reports annually; in rare cases, recipients may be required to report more frequently, consistent with 2 CFR § 200.329. Other forms are collected once, either at the time of application or at the time of award. NEH maintains an open call for peer reviewers, so individuals may voluntarily respond at any time.

# 4.) Duplication

NEH's Office of the Chair, Office of General Counsel, and Office of Grant Management participate in an internal clearance process to review NOFOs and other documents covered by this clearance to avoid unnecessary duplication.

Recipients from several NEH programs complete performance reports that are tailored to the program, so recipients do not have to complete more than one form or provide duplicate information.

In several cases, NEH modifies existing forms as a basis for its collections. For example, many NEH reports included in this request are based on the basic Performance Progress Report with the addition of agency/program-specific questions. Recipients are only required to complete one version of the interim and final performance progress report.

# 5.) Minimizing Burdens on Small Businesses

NEH is committed to streamlining its application instructions and simplifying the application process. To ensure uniformity with other federal grantmaking agencies, NEH has aligned the format and sequencing of its NOFOs with Appendix I of 2 CFR 200 and strives to balance the need for information with refraining from placing undue burden on its applicants. The agency's internal clearance process ensures that no undue burden is placed on applicants seeking NEH funding.

# 6.) Consequences of Not Conducting Collections

NEH is a grantmaking agency and needs these collections to solicit applications; determine applicant eligibility and qualification; and evaluate project performance. Without the use of these collections, NEH would not be able to fund deserving projects in the humanities, as authorized by 20 U.S.C. § 956, et seq. NEH aligns the frequency and content of its information collections with 2 CFR 200 and has a two-tiered clearance process for NOFOs.

# 7.) Explaining Special Circumstances

One of NEH's information collections could fall under one of the scenarios listed in the instructions. Recipients of individual awards must submit the NEH Individual Programs Acceptance Form to confirm their start dates before receiving their award. If the recipient wants the award to start within 30 days of the decision notification, they would have to complete the form fewer than 30 days after receipt.

### 8.) Consultation Outside of the Agency

NEH's request for comment was published in the Federal Register on 5/24/2024 at 89 FR 45926:

https://www.federalregister.gov/documents/2024/05/24/2024-11529/agency-information-collection-request-60-day-public-comment-request. It invited people to comment on NEH's estimated cost and burden hours for information collections. It received no comments.

### 9.) Payment or Gift to Respondents

NEH does not provide payments or gifts to any respondents.

# 10.) Privacy and Confidentiality

NEH includes a privacy policy in its NOFOs that references NEH's System of Records Notice (SORN). The Federal Register citation for NEH's SORN is 87 FR 8616.

Information collections under this request collect minimal personally identifiable information (PII) that is necessary to identify who is applying for / participating in an NEH award and their qualification. PII collected includes individuals' names, addresses, phone numbers, email addresses, and employment history.

One form, the NEH Individual Programs Acceptance Form, collects sensitive PII. This form is completed by individuals who have been selected to receive an NEH individual award and collects PII necessary to verify their eligibility to receive federal funds. It is a secure, encrypted form, and permissions to view PII are limited to NEH staff who need this information to process awards.

# 11.) Justification for Sensitive Questions

NEH does not collect any sensitive information from respondents, including details about sexual behavior and attitudes, religious beliefs, or race/ethnicity.

### 12.) Information Collection Burden Estimates

Title	Type of collection	Number of	Annual	Hours per	Total hours
A NICH NEED OF		respondents	responses	response	_
1. NEH Notice of	NOFO	4,894	1	60.00	293,640
Funding	template				
Opportunity					
Template					
2. FPIRI	Report	50	1	0.50	25
Evaluation Form	template				
3. Certification of	Award form	100	1	0.50	50
Matching Gifts					
for NEH					
Challenge Grants					
4. NEH	Application	150	1	0.25	38
Assurances as to	form				
Labor Standards					
5. NEH	Award form	75	1	0.50	38
Certification of					
Gifts/Pledges					
6. NEH	Award form	35	1	0.50	18
Organizational					
Survey					
7. NEH	Application	1,400	1	0.33	467
Supplemental	form				
Information for					
Individuals					
8. Supplementary	Application	3,450	1	0.17	575
Cover Sheet for	form				
NEH Grant					
Programs					

9. Supplementary Cover Sheet for NEH State Councils	Application form	56	1	0.17	9
10. NEH Panelist Sign Up Form	Review form	236	1	0.50	118
11. NEH Institutional Profile	Application form	157	1	0.25	39
12. NEH Individual Progress Report	Report template	191	1	1.00	191
13. NEH Interim Performance Progress Report	Report template	542	1	2.00	1,084
14. NEH Final Performance Progress Report	Report template	419	1	2.00	838
15. Activities and Outcomes Report for the State Humanities Councils	Report template	56	1	30.00	1,680
16. NEH Interim Performance Progress Report - Challenge Programs	Report template	105	1	2.00	210
17. NEH Final Performance Progress Report - Challenge Programs	Report template	30	1	2.00	60
18. NEH Individual Programs Acceptance Form	Award form	225	1	0.50	113
19. State Humanities Council SHARP interim report	Report template	56	1	2.00	112
20. State Humanities Council SHARP final report	Report template	56	1	3.00	168
21. State Humanities Council SHARP Subrecipient Selection Report	Report template	56	1	10.00	560
22. SHARP	Report	6	1	10.00	60

Subrecipient Selection Report (individuals)	template				
23. SHARP Subrecipient Selection Report (organizations)	Report template	7	1	10.00	70
24. Final Performance Report: Preservation Assistance Grants	Report template	70	1	2.00	140
25. Performance Reports: Public Humanities Projects (Implementation)	Report template	47	1	2.00	94
26. Performance Reports: Public Humanities Projects (Planning)	Report template	26	1	2.00	52
27. Performance Reports: Public Humanities Projects (Humanities Conversations)	Report template	11	1	2.00	22
28. Fed/State Supplemental Funding Interim Report (new collection)	Report template	56	1	4.50	252
29. Fed/State Supplemental Funding Final Report (new collection)	Report template	56	1	4.50	252
30. Fed/State Partnership Regrant Report (new collection)	Report template	56	1	8.00	448
31. Performance Report: Division of Education Programs (new collection)	Report template	200	1	2.00	400
32. Performance Report: Digital Projects for the Public (new	Report template	28	1	2.00	56

collection)					
33. Performance	Report	29	1	2.00	58
Report: Media	template				
Production (new collection)					
34. FPIRI	Report	70	1	0.17	12
Fellowship Data	template				
Form (new					
collection)					
35. FPIRI	Report	13	1	1.00	13
Financial Report	template				
(new collection)					
TOTAL					301,962

Respondent time is estimated at \$70.76 per hour, making the total annual burden dollars \$21,366,831.10.

There have been no significant changes to the number of respondents to these collections or the time required to complete them since the previous revision, so our burden estimates for existing collections remain the same. Burden estimates for new collections are based on the average number of applicants to the relevant programs.

# 13.) Cost Burden

These information collections do not require equipment or services outside of what is part of customary and usual business.

## 14.) Information Collection Cost to Federal Government

We estimated the total hours based on the complexity of the forms staff review. NEH staff spend approximately four hours reviewing and processing each application (including the associated forms), one hour reviewing performance reports, and thirty minutes for each voluntary peer review application. The table below shows review time and cost.

Title	Type of collection	Annual responses	NEH review hours	Total NEH review hours
1. NEH Notice of Funding Opportunity Template	NOFO template	4,894	4	19,576
2. FPIRI Evaluation Form	Report template	50	1	50
3. Certification of Matching Gifts for NEH Challenge Grants	Award form	100	1	100
4. NEH Assurances as to Labor Standards	Application form	150	0	0
5. NEH Certification of Gifts/Pledges	Award form	75	1	75
6. NEH Organizational Survey	Award form	35	1	35
7. NEH Supplemental	Application	1,400	0	0

Information for Individuals	form			
8. Supplementary Cover Sheet	Application	3,450	0	0
for NEH Grant Programs	form	07.10		
9. Supplementary Cover Sheet	Application	56	0	0
for NEH State Councils	form			
10. NEH Panelist Sign Up	Review form	236	0.5	118
Form				
11. NEH Institutional Profile	Application	157	0	0
	form			
12. NEH Individual Progress	Report	191	1	191
Report	template			
13. NEH Interim Performance	Report	542	1	542
Progress Report	template			
14. NEH Final Performance	Report	419	1	419
Progress Report	template			
15. Activities and Outcomes	Report	56	1	56
Report for the State	template			
Humanities Councils				
16. NEH Interim Performance	Report	105	1	105
Progress Report - Challenge	template			
Programs				
17. NEH Final Performance	Report	30	1	30
Progress Report - Challenge	template			
Programs				
18. NEH Individual Programs	Award form	225	1	225
Acceptance Form		1		
19. State Humanities Council	Report	56	1	56
SHARP interim report	template			
20. State Humanities Council	Report	56	1	56
SHARP final report	template			
21. State Humanities Council	Report	56	1	56
SHARP Subrecipient Selection	template			
Report	Domont			
22. SHARP Subrecipient	Report	6	1	6
Selection Report (individuals)	template	+		
23. SHARP Subrecipient	Report	7	1	7
Selection Report (organizations)	template			
24. Final Performance Report:	Donort	70	-	70
Preservation Assistance	Report template	70	1	70
Grants	template			
25. Performance Reports:	Report	47	1	47
Public Humanities Projects	template	4/	1	4/
(Implementation)	template			
26. Performance Reports:	Report	26	1	26
_	_	20	1	20
	Complete			
	Report	11	1	11
			•	
	F			
Public Humanities Projects (Planning)  27. Performance Reports: Public Humanities Projects (Humanities Conversations)	Report template	11	1	11

28. Fed/State Supplemental Funding Interim Report (new collection)	Report template	56	1	56
29. Fed/State Supplemental Funding Final Report (new collection)	Report template	56	1	56
30. Fed/State Partnership Regrant Report (new collection)	Report template	56	1	56
31. Performance Report: Division of Education Programs (new collection)	Report template	200	1	200
32. Performance Report: Digital Projects for the Public (new collection)	Report template	28	1	28
33. Performance Report: Media Production (new collection)	Report template	29	1	29
34. FPIRI Fellowship Data Form (new collection)	Report template	70	1	70
35. FPIRI Financial Report (new collection)	Report template	13	1	13
TOTAL				22,365

The total time that NEH will spend reviewing these information collections is 22,365 hours. With staff time estimated at \$70.76 per hour, the total cost to the federal government is \$1,582,547.40.

## 15.) Explanation of Adjustments

The total burden requested for this revision has decreased slightly (by 95 hours) from NEH's existing clearance, but it includes 8 additional information collections. The new collections include program-specific performance reports that better tailor report questions to the specific program.

### 16.) Publication Plans

NEH will not publish responses to these information collections.

# 17.) Displaying OMB Control Number

NEH is not seeking approval to not display the OMB approval expiration date.

# 18.) Exceptions to "Certification for Paperwork Reduction Act Submissions"

NEH has no exceptions to the topics of the certification statement.