

Supporting Statement - Part A
National Aeronautics and Space Administration (NASA)
NASA Assurance of Civil Rights Compliance
OMB Control Number: 2700-0148

Type of information collection: Reinstatement with Change of Previously Approved Collection.

Abstract: NASA form 1206, Assurance of Civil Rights Compliance serves as the information collection instrument and is required from all applicants for federal financial assistance, e.g., grant awards and cooperative agreements.

Summary of Changes from the Previously Approved Collection

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- Removed diversity, equity, and inclusion (DEI) related and gender-identity references to comply with Executive Orders (E.O.) 14151 and 14168.
- Added shared-ancestry protections under Title VI; aligned formatting with E.O. 14188, including clarification that Title VI prohibits antisemitism and other shared-ancestry discrimination.
- Removed material referencing E.O. 13166 which was revoked by E.O. 14224.
- Removed gender-identity from Question 2 and clarified applicability for education-related recipients per E.O. 14168.

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- Added new anti-harassment reporting requirement per 85 FR 13934.

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- Updated Section 2 to add “shared ancestry,” remove “gender identity,” and align with E.O. 14188 and 14168.

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- Added Unique Entity Identifier (UEI) field to support procurement tracking.
- Updated the Office of Equal Opportunity name and address.
- Updated Paperwork Reduction Act (PRA) Statement.

Removed Section 5 “Additional Program Information” because NASA no longer maintains a civil rights guidance website.

1. Need for the Information Collection.

NASA, as a federal agency providing financial assistance through grant awards and cooperative agreements, is required to receive signed assurance of civil rights compliance from all applicants for federal financial assistance, such as grants and/or cooperative agreements. NASA must also collect information from institutions applying for these — like universities, museums, science centers, and research institutes—to ensure they meet all regulatory requirements.

This requirement is pursuant to the U.S. Department of Justice (DOJ) Civil Rights Division regulations for coordination and enforcement of Title VI of the Civil Rights Act of 1964 and other grant-related civil rights laws (28 C.F.R. Sec. 42.407(d)(4) found online

at <https://www.ecfr.gov/current/title-28/chapter-I/part-42/subpart-F/section-42.407>) and NASA's Title VI regulations at 14 C.F.R. Parts 1250-1253 and 1260 (found online at <https://www.ecfr.gov/current/title-14/chapter-V>)

Under DOJ regulations, agencies must obtain information on any discrimination-related lawsuits, and any civil-rights compliance reviews conducted on the applicant. NASA also follows DOJ's guidance, which includes a model civil-rights assurance form adopted by the Agency.

2. Purpose and Use of the Information Collection.

The NASA Office of Equal Opportunity collects information from institutions applying for a grant and/or a cooperative agreement award, to ensure regulatory requirements are met via the NASA Form 1206 *Assurance of Civil Rights Compliance with NASA Regulations Pursuant to Nondiscrimination in Federally Assisted Programs*. The collection of this information is used to select recipients for compliance reviews and to assist in investigations of alleged illegal discrimination by the recipient.

The form collects two categories of information:

Section 1 captures the applicant's commitments to comply with civil-rights obligations, including acknowledging the terms of receiving NASA financial assistance, cooperating with compliance reviews, maintaining required records, and, when applicable, identifying staff and procedures for coordinating civil-rights responsibilities.

Section 2 requires applicants to report whether any discrimination accusations have occurred within the past three years. If applicable, they must provide information about complaints, proceedings, and outcomes involving discrimination based on race, color, national origin, sex, age, or disability, including complaints filed with Federal agencies. If an award period exceeds three years, applicants must resubmit updated civil-rights information every three years or upon reapplication.

NASA uses the information to make pre-award compliance determinations, to identify post-award compliance-review candidates, and to support investigations of alleged discrimination.

NASA retains these records according to its Records Retention Schedule 5/27A (found online at https://nodis3.gsfc.nasa.gov/NPR_attachments/NRRS_1441.1_09032025.pdf.)

3. Use of Information Technology.

NASA Form 1206 is available as a fillable and electronically signable PDF. NASA anticipates that most respondents will maintain relevant records electronically within their Human Resources, administrative, or legal offices. When documentation is required, institutions may submit scanned or PDF records, and NASA accepts all responses electronically, including by email.

4. Duplication of Information.

NASA ensures the information collected is not duplicated by coordinating with the DOJ Civil Rights Division, Federal Compliance and Coordination Section.

5. Burden on Small Businesses.

NASA primarily awards grants and cooperative agreements to large educational institutions and nonprofit organizations, there is no significant impact on small businesses.

6. Consequences of Not Conducting Collection.

NASA cannot award federally funded grants or cooperative agreements to institutions that are not compliant with civil rights laws.

7. Special Circumstances.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. Consultations and Public Comments.

A 60-day Federal Register Notice (FRN): 90 FR 34014 was published on 7/18/2025. One comment was received and uploaded as part of this submission. NASA appreciates the commenter's feedback. After evaluating the comment, NASA decided that the existing information collection, burden hours, and cost estimates were already accurate and appropriate.

A 30-day FRN: 91 FR 45829 was published on 7/21/2026.

9. Payments or Gifts.

No payments or gifts are offered to respondents.

10. Confidentiality.

NASA does not provide any assurance of confidentiality. Respondent information is protected in accordance with applicable NASA Information Technology security and privacy policies. Privacy protected data is not collected as part of this information collection.

11. Questions of Sensitive Nature.

Questions of sensitive nature are not included in this collection.

12. Burden of the Information Collection.

The table below summarizes the estimates of the hour burden of the collection.

Category of Respondents	Total Annual Responses	Estimated Time per Response	Total Annual Burden Hours
Individuals	250	4 hours	1000 hours

13. Annual Cost to Respondents.

The estimated cost burden per respondent is approximately \$120.00, which is based on an estimate of 4 hours of effort multiplied by \$30 (the estimated average hourly wage of professional, administrative, and clerical salaries.) With an estimated 250 respondents

annually, the total annual cost burden is \$30,000.

14. Cost to the Federal Government.

NASA's estimated cost to process the information collection is 2 hours of staff time per respondent at an hourly rate of \$50, resulting in a total annual government cost of \$25,000.

15. Reasons for Change in Burden.

This collection is a reinstatement with change to an expired control number. The respondent burden remains unchanged, and revisions were made solely to align the form with applicable Executive Orders.

16. Tabulation or Publication of Results.

There are no plans for tabulation and/or publication.

17. Display of OMB Approval Date.

The form will display the OMB Control Number and expiration date. NASA displays an approved PRA statement for this collection.

18. Exceptions to Certification for PRA Submissions.

There are no exceptions to the certification statement stated in 5 CFR 1320.9.