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Sub-Grants (1989-1990): Correspondence 04

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Reynolds
11/13/89

November 13, 1989

Dear _:

The Congress has directed the National Endowment for the Humanities to increase its oversight of "subgrants," that is, awards made by the Endowment's grantees with the Endowment's funds. After a thorough review of the wording and background of the Congressional directive, the Endowment has determined that the grants affected would include the NEH-financed fellowships and research awards sponsored by the American Council of Learned Societies, the International Research and Exchanges Board, the Committee on Scholarly Communication with the People's Republic of China, the Social Science Research Council, the Council for Basic Education, and the various NEH fellowships at centers for advanced study.

According to the Congressional directive, the oversight procedures adopted by the Endowment must be stringent enough to make the Endowment's Chairman and the National Council on the Humanities "as thoroughly informed and responsible for the subgrants as they are for direct grants." The Council and I have been at pains to fashion procedures that would satisfy this requirement yet respect the integrity, independence, diverse nature, and proven quality of the subgranting programs that the Endowment supports. That has not been easy; but after lengthy discussions at two of its regular quarterly meetings, the Council made the following recommendations for procedures. Because the procedures are new to the Endowment, I emphasize that they may be modified as experience demands.

- (1) NEH will ask subgranting organizations and institutions to pay special attention, as they consider candidates for NEH awards, to the intent and special terms of the NEH bloc grants from which the awards are to be made. Relevant to the intent are NEH's appropriations and authorization legislation, including the definition of the humanities, and applicable official NEH publications, including program guidelines and application instructions.
- (2) After they have completed their review of applications and before they have made any awards, subgrantors will forward lists of proposed subgrants to NEH, subgrant program by subgrant program. These lists will identify proposed award recipients (including alternates) by name, field, and institutional affiliation, and will include a description for each project that is long enough to enable the Endowment to ascertain that the proposed subgrants qualify for support, given the intent and terms of the underlying Endowment bloc grant. The lists will be accompanied by complete applications from all persons proposed for awards.
- (3) NEH staff will promptly examine the lists, solicit additional information from the subgrantor as needed, and mail the lists, together with any applications that it deems worthy of further review, to the appropriate National Council Committee, which will act for the full Council. Committee members will make their recommendations to the Chairman of NEH within one week after receiving the list, and the Chairman will make decisions and communicate them to the subgranting organization promptly thereafter.

The procedures apply to all subgrants made with NEH outright and matching funds from this date forward. They do not, however, apply to subgrants supported by non-federal funds that are given for the purpose of matching NEH funds. Although NEH will continue its policy of matching non-federal funds only if the activities supported by them are eligible for direct NEH support, the Council did not deem it necessary to apply the recommended oversight procedures to subgrants supported by non-federal funds, whether matched by NEH or not.

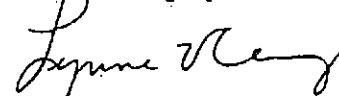
The practice of conducting site visits to centers for advanced study is already part of the evaluation of centers' applications for NEH funds. So, where it has been deemed necessary, is the practice of visiting meetings of centers' selection committees. Because the oversight procedures outlined above fall short of applying to individual subgrants the same grant-by-grant scrutiny that the

National Council and the Chairman apply to the grants that the Endowment makes directly, the Council recommended that NEH staff conduct periodic site visits to selection committee meetings in all the subgrant programs. The purpose of such visits will not be to influence or participate in the recommending process, but to satisfy ourselves of the thoroughness and adequacy of the selection procedure itself. Normally, a selection committee will be visited every three years. Under special circumstances, however, visits could take place more often. After every visit, a report would be made to the appropriate National Council Committee at the next regular meeting of the Council.

I recognize that variations in schedules and methods of operation make the application of a uniform set of oversight procedures to all subgranting programs extremely difficult, and the Endowment is prepared to introduce these procedures flexibly to fit individual circumstances. The NEH staff will contact you soon to discuss the details and timing of the application of the proposed oversight procedures to your program, to give you a chance to air your concerns, and to iron out any problems that you foresee. The staff will also want to discuss the details and scheduling of the submission of your proposed award lists to the Endowment. To keep the numbers of mailings to the Council Committees manageable, the Endowment hopes to establish a schedule of no more than five or six mailings each year, and the staff will want to know what schedule would best accommodate you.

In closing, please permit me to thank you for your long service to the humanities. As we work in the year ahead to comply with Congressional directives for oversight of regrants, I will also be grateful for your advice and counsel as to how these procedures can be improved.

Sincerely yours,



Lynne V. Cheney
Chairman

Variable information for transmitting subgrant letter

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