



NATIONAL ENDOWMENT FOR THE HUMANITIES

Equity Action Plan

Executive Summary

The National Endowment for the Humanities (NEH) serves the American public by promoting advanced research, deeply informed teaching in schools and colleges, lifelong learning, and the preservation of cultural collections. NEH is the only Federal agency dedicated to funding the humanities, which include history, philosophy, literature, language, ethics, archaeology, political theory, jurisprudence, comparative religion, and the humanistic social sciences.

NEH supports the fundamental building blocks of American civil society, helping Americans of all backgrounds to examine the human condition, understand our cultural heritage, foster mutual respect for diverse beliefs and cultures, develop media and information literacy, and pursue civic engagement. Since its founding in 1965, NEH has awarded nearly \$6 billion in grants to support museums, historic sites, colleges, universities, K-12 teaching, libraries, public television and radio stations, research institutions, and independent scholars nationwide – providing a critical lifeline to the nation’s cultural and educational sectors and sustaining the United States’ role as a global leader in the humanities.

Now—as our nation grapples with the COVID-19 pandemic, the persistent scourge of systemic racism, the ongoing climate emergency, and existential threats to our democracy—the humanities are more vital than ever.

Through President Biden’s Executive Order on Advancing Racial Equity and Support for Underserved Communities (EO 13985), the Biden-Harris Administration has developed a whole-of-Government approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality (*see footnote*).¹ Pursuant to Executive Order 13985, NEH will implement an Equity Action Plan that embeds equity across its programs and operations, ensuring that the agency continues to fulfill its statutory mission to expand access to the humanities to “people of all backgrounds”² for decades to come.

In June 2022, NEH will launch an agency-wide Equity Task Force to address barriers to full and equal participation in the agency’s programs and opportunities. The NEH Equity Task Force will focus on the following objectives, as outlined in the Equity Action Plan:

- 1) **Bolstering NEH’s Data Collection Capacity:** Creating an Office of Data & Evaluation and building a robust data collection system to analyze the effectiveness of NEH programs and policies and determine whether, and to what extent, they advance equity and support for underserved communities;

¹ See President Biden’s Executive Order on Advancing Racial Equity and Support for Underserved Communities (13985) for definitions of “equity” and “underserved communities.” <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

² The National Foundation on the Arts and the Humanities Act of 1965, Pub. L. 89-209, sec. 2(4), *codified at* 20 U.S.C. § 951(4).

- 2) **Enhancing NEH’s Outreach and Branding for Underserved Communities:** Creating an Office of Outreach and refining the agency’s branding to increase engagement with communities and institutions that have been historically underserved by NEH, such as Tribal Nations, veterans, Historically Black Colleges and Universities (HBCUs), Hispanic Serving Institutions (HSIs), Tribal Colleges and Universities (TCUs), and community colleges;
- 3) **Simplifying NEH’s Grant Application Process:** Simplifying the agency’s grant application processes and funding opportunity notices; and
- 4) **Expanding NEH’s Procurement Opportunities:** Removing barriers to full and equal participation in the agency’s procurement and contracting opportunities.

NEH’s Equity Action Plan is distinct from its response to President Biden’s Executive Order on Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce (EO 14035), which requires the agency to recruit and retain a workforce that “draws from the full diversity of the Nation.”³ Under Executive Order 14035, NEH will focus on establishing a Chief Diversity Officer position to advise the agency on matters of DEIA across its programs, operations, and policies; implementing regular trainings on implicit bias and other DEIA-related matters for staff, peer reviewers, and members of the National Council on the Humanities;⁴ and providing professional development opportunities to NEH staff that are tailored toward learning more about the diverse communities and institutions that the agency serves.

The following sections set forth NEH’s Equity Action Plan to address barriers to full and equal participation in the agency’s programs and opportunities, in furtherance of Executive Order 13985.

Summary of Early Accomplishments

In FY 2021, NEH distributed \$135 million in emergency relief funding under the American Rescue Plan Act of 2021 (ARP) to cultural and educational institutions affected by the ongoing COVID-19 pandemic. NEH’s ARP programs provided essential support to museums, historic sites, colleges, universities, libraries, and public television and radio stations nationwide that have been forced to lay off and furlough staff, cancel programs, cut departments, close facilities, and tap institutional reserves.

The COVID-19 pandemic has exposed and exacerbated severe and pervasive health, social, and economic inequities in the United States, including within the cultural and educational sectors. This problem is particularly acute for HBCUs,⁵ TCUs,⁶ and colleges in rural communities.⁷ In administering a national emergency relief program with historic implications for the recovery of these sectors, NEH recognized the importance of embedding equity into its ARP implementation framework.

³ Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce (EO 14035), <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/25/executive-order-on-diversity-equity-inclusion-and-accessibility-in-the-federal-workforce/>

⁴ See, for example, implicit bias trainings for peer reviewers offered by the National Institutes of Health (NIH) and National Science Foundation (NSF).

⁵ <https://www.usatoday.com/story/news/education/2020/06/09/coronavirus-hbcu-colleges-fall-semester-2020/5286165002/>;

<https://www.chicagoreporter.com/1-in-10-hbcus-were-financially-fragile-before-covid-19-endangered-all-colleges-and-universities>

⁶ <https://www.pbs.org/newshour/show/covid-knocked-the-wind-out-of-navajo-nation-its-colleges-heres-how-theyre-recovering>;

<https://www.insidehighered.com/news/2021/03/16/tribal-colleges-report-pandemic-related-challenges-around-mental-health-persistence>

⁷ https://assets.website-files.com/5fd3cd8b31d72c5133b17425/60101b889e224095a4e50c04_Final%20Final%20Joyce%20Report.pdf

NEH's agency-wide implementation of the ARP provided a rare opportunity for staff to develop cross-divisional approaches to equity. Rather than implement its ARP programs at the division or office level, as the agency does for its regular grant lines, NEH's staff took a whole-of-agency approach, developing high-level, cross-cutting strategies to ensure the equitable distribution of ARP funds. NEH ultimately designed three funding streams for ARP, each strategically designed to reach a different portion of the humanities community:

- **ARP State Affiliates Program.** NEH's state affiliates—the 56 state and jurisdictional humanities councils—are essential partners in the agency's efforts to advance equity and support underserved communities. As representatives of every U.S. state and territory, the councils ensure that all Americans, from Alaska to Florida to the Northern Marianas, benefit from diverse, local, and place-based humanities programming. Through the regranting of Federal support, the councils reach an estimated annual audience of 137 million people.⁸ As directed by Congress, NEH distributed approximately 40 percent of NEH's ARP program funds,⁹ or \$51.6 million, to the 56 state and jurisdictional humanities councils in spring 2021, allowing for accelerated distribution of funds to local humanities organizations and programs around the country. NEH announced this program on May 19, 2021, and began distributing funds for the program the week of June 14, 2021.¹⁰

In its funding guidance to the councils, NEH stated that it “strongly encourages [councils] to develop grantmaking programs directed at increasing equity and inclusion and/or directed at underserved and minority-serving institutions and organizations.”¹¹ Through their local networks and individual subawards structures, state and jurisdictional humanities councils can reach smaller organizations that might not have been as competitive had they applied to NEH's other ARP awards programs, described below. NEH also allowed the state councils to use ARP funds to support humanities organizations' general operating expenses in addition to specific programs, which removed the burden on small and underserved organizations to devise new humanities programs. Finally, most councils developed individualized outreach strategies—including new and improved communications channels, in-person and online grant workshops, and strategic partnerships—that allowed their calls for applications for ARP funds to reach underserved communities.

- **ARP Competitive Open Grant Program.** In October 2021, NEH awarded \$59 million in emergency relief funding through NEH's *ARP: Humanities Organizations* program,¹² which offered cultural and educational institutions one-year grants of up to \$500,000 to support humanities projects across the fields of education, preservation and access, public programming, digital humanities, and scholarly research. Importantly, grantees can use relief funding to retain or hire staff. The Notice of Funding Opportunity (NOFO) for this program, which NEH published on April 7, 2021, specifically encouraged applications from “underserved and minority-serving institutions and organizations.”¹³

Examples of *ARP: Humanities Organizations* awards include a grant to the Arkansas Museum of Fine Arts to support the retention of staff members engaged in collection stewardship activities and to plan exhibits for the museum's newly renovated building; an

⁸ <https://www.neh.gov/news/neh-receives-135-million-distribute-cultural-institutions-affected-pandemic>

⁹ NEH's governing statute sets forth the formula by which NEH allocates funds among its state and jurisdictional affiliates. 20 U.S.C. § 956(f).

¹⁰ <https://www.neh.gov/news/neh-announces-american-rescue-plan-funding-state-and-jurisdictional-humanities-councils>;

<https://www.neh.gov/sites/default/files/inline-files/ARP%20funding%20to%20state%20and%20jurisdictional%20humanities%20councils.pdf>

¹¹ <https://www.neh.gov/sites/default/files/inline-files/ARP%20SHC%20FAQS%2008.02.21.pdf>

¹² <https://www.neh.gov/program/american-rescue-plan-humanities-organizations>

¹³ <https://www.neh.gov/sites/default/files/inline-files/American%20Rescue%20Plan%20Humanities%20Organizations%20NOFO%2020210514-ARPO%20%281%29.pdf>;
<https://www.neh.gov/sites/default/files/inline-files/American%20Rescue%20Plan%20Humanities%20Grantmaking%20NOFO%2020210513-ARPG.pdf>

award to the GLBT Historical Society in San Francisco to support the creation and retention of archivist positions focused on the expansion of the organization’s LGBTQ+ history collections; a grant to the Thomas Jefferson Foundation to develop an African American oral history project at Monticello in Charlottesville, Virginia; an award to the University of Oklahoma Press to develop a new Native American imprint in collaboration with the university’s Native Nations Center in Norman, Oklahoma; a grant to the University of Puerto Rico, Mayagüez Campus, to reinstate lost faculty, student, and consultant positions at the university’s Oral History Lab; an award to the Cheyenne River Youth Project in Eagle Butte, South Dakota, to support Tribal elders and language instructors in developing a new Lakota language and culture internship for youth; and more.¹⁴

- **ARP Grantmaking Program.** Also in October 2021, NEH awarded \$28.8 million in emergency relief funding through the *ARP: Humanities Grantmaking* program¹⁵ to 13 organizations that will administer competitive grantmaking programs in the humanities. The 13 subaward programs – some of which are expansions of existing grantmaking programs and others of which are entirely new – will support organizations or individuals undertaking humanities activities and expand NEH’s reach into communities and sectors that are underrepresented in the agency’s programs. The NOFO for *ARP: Humanities Grantmaking*, posted on April 7, 2021, specifically encouraged applications from “underserved and minority-serving institutions and organizations.”¹⁶

Examples of *ARP: Humanities Grantmaking* awards include a grant to the Oral History Association in Murfreesboro, Tennessee, to support both year-long and short-term fellowships for oral history practitioners who have suffered career and employment disruptions; an award to the New York City-based Firelight Media to administer a fellowship program for mid-career filmmakers who are Black, Indigenous, or people of color whose work on historical or humanities-focused documentary film projects was disrupted by the pandemic; a grant to the Association of Tribal Archives, Libraries, and Museums to assist up to 175 tribal governments, tribal cultural facilities, and allied institutions in reopening and reestablishing community-based humanities programming and resources; an award to the Association for Asian Studies in Ann Arbor, Michigan, to underwrite fellowships for Asian studies professionals to conduct humanities research, teaching, and multimedia projects, with a particular focus on providing opportunities for career development for junior scholars, contingent or adjunct faculty, Black scholars in Asian studies, first-generation scholars, and independent scholars or Asia specialists working outside the professoriate; a grant to the American Council of Learned Societies to offer funding to support publicly engaged humanities initiatives at colleges and universities that address issues of pandemic recovery, racial equity, climate change, international relations, and strengthening democracy; and more.¹⁷

NEH intends to build on these early successes with its Equity Action Plan, as follows.

Equity Action Plan

Equity Task Force Framework

¹⁴ https://www.neh.gov/sites/default/files/inline-files/NEH%20ARP%20awards%20list%20state%20by%20state_1.pdf

¹⁵ <https://www.neh.gov/news/neh-awards-288-million-arp-funding-13-grantmaking-organizations>

¹⁶ <https://www.neh.gov/sites/default/files/inline-files/American%20Rescue%20Plan%20Humanities%20Organizations%20NOFO%2020210514-ARPO%20%281%29.pdf>

¹⁷ <https://www.neh.gov/sites/default/files/inline-files/American%20Rescue%20Plan%20Humanities%20Grantmaking%20NOFO%2020210513-ARPG.pdf>

¹⁷ <https://www.neh.gov/sites/default/files/inline-files/NEH%20ARP%20Humanities%20Grantmaking%20awards%20state%20by%20state.pdf>

In June 2022, NEH will launch an agency-wide Equity Task Force to implement the Equity Action Plan. The task force will comprise four working groups focused on the following actions: (1) bolstering NEH's data collection capacity; (2) enhancing NEH's outreach and branding for underserved communities; (3) simplifying NEH's grant application process; and 4) expanding NEH's procurement opportunities.

The task force will balance its membership between the agency's administrative and program staff and between supervisory and non-supervisory employees, and will include members from the agency's Office of the General Counsel, the Senior Executive Service, and the agency's Schedule C appointees. The task force will engage with the National Council on the Humanities; the agency's network of 56 state and jurisdictional humanities councils; and other external stakeholders as appropriate.

By March 2023, NEH will establish the framework for (1) an Office of Data & Evaluation, which will provide insights into the agency's impact on underserved communities and institutions; (2) an Office of Outreach and a revised branding strategy, which will increase engagement with communities and institutions that have been historically underserved by NEH; (3) a grant application process that better serves the underserved communities that NEH seeks to support; and (4) a procurement policy that deepens the agency's support for small businesses that are owned by members of underserved communities.

At the March 2023 meeting of the National Council on the Humanities, the task force will present its findings and results to the Chair, senior leadership, and National Council.

Action #1: Bolstering NEH's Data Collection Capacity

a. Barrier to Equitable Outcomes

NEH does not currently use an agency-wide, data-driven framework to analyze the effectiveness of its grants and the extent to which they reach underserved communities and institutions such as Tribal Nations, veterans, HBCUs, HSIs, TCUs, and community colleges. Further, NEH does not currently collect equity metrics, such as demographics, from grant applicants, hindering the agency's ability to fully measure the outcomes of applications from underserved communities.

b. Action and Intended Impact on Barriers

In summer 2022, NEH will hire a Director to establish an Office of Data & Evaluation that develops an agency-wide, data-driven framework to analyze the effectiveness of its grants and the extent to which they reach underserved communities and institutions. An Office of Data & Evaluation will enable NEH staff to design and implement programs, conduct outreach, and fund applications using a data-driven framework that provides clearer insights into the agency's impact on underserved communities and institutions.

The Office will be staffed by professional data scientists and social scientists, who will:

- Collect data about the organizations and individuals that apply to NEH, the principal investigators responsible for those applications, and the NEH peer reviewers who evaluate them;

- Perform in-house studies about the impact of NEH’s awards, particularly by analyzing completed projects to see how they have impacted the field over time;
- Award grants and contracts to outside organizations (*e.g.*, researchers who are experts in equity) to perform studies of NEH’s work; and
- Provide reliable data to NEH leadership to inform new grant programs, outreach strategies, and hiring practices.

From June 2022 to March 2023, the Equity Task Force working group focusing on Action #1 will develop an implementation plan for the launch of the Office of Data & Evaluation. The working group will work closely with the incoming Director of the Office of Data & Evaluation and the agency’s Office of the General Counsel to develop options for the collection of equity metrics from grant applicants and grant recipients. The working group will also consider (1) collecting additional data from non-awarded applicants to guide the agency’s ongoing review of its programs as well as (2) addressing access constraints in underserved communities, which could limit the Office’s ability to collect robust data. Finally, the working group will comply with the Paperwork Reduction Act, which requires the Office of Management and Budget (OMB) to approve certain data collections.

To inform the work of this new Office, the working group will gather and evaluate existing data from its archive of grant applications. This initial assessment will provide a sense of current deficiencies in the agency’s data collection and guide the development of future actions to promote equity in the agency’s grantmaking programs.

c. Tracking Progress

The Equity Task Force working group focusing on Action #1 will develop an implementation plan for the launch of the Office of Data & Evaluation from June 2022 to March 2023. The working group will engage regularly with members of the National Council on the Humanities; the agency’s network of 56 state and jurisdictional humanities councils; Federal grantmaking agencies with robust data collection systems; and representatives of communities and institutions that have been historically underserved by NEH, as appropriate.

The implementation plan for the Office of Data & Evaluation will include short- and long-term progress metrics, such as reporting to the Chair, senior leadership, the National Council on the Humanities, and stakeholders at every meeting of the National Council. In March 2023, the working group will submit the implementation plan and report on its findings to the Chair, senior leadership, and the National Council.

By FY 2024, the agency aims to have a robust data collection system that establishes a baseline understanding of NEH’s support for underserved communities and institutions. NEH will use this data to design and implement programs, conduct outreach, and select applications for funding.

d. Accountability

Once hired, the Director of the Office of Data & Evaluation will lead the working group focused on Action #1. NEH will identify two senior staff members from the agency’s program and administrative offices to lead the working group in the interim and support the new Director once appointed. The Director will meet regularly with NEH leadership to discuss the work of

the group. The agency will report on its overall progress on data collection in internal and external communications, as appropriate. The Director will provide reports to the Chair, senior leadership, the National Council on the Humanities, and relevant stakeholders on the development of the agency's data metrics before every meeting of the National Council (which meets at the call of the Chair but may not meet less often than twice during each calendar year).

NEH will also incorporate this action and other equity goals into the agency's forthcoming FY 2022–2026 strategic plan.

Action 2. Enhancing NEH's Outreach and Branding for Underserved Communities

a. Barrier to Equitable Outcomes

Although NEH program staff regularly interact with the American public through speaking engagements, conferences, and webinars regarding the agency's grant programs and funding opportunities, NEH lacks a centralized, data-driven outreach strategy focused on engagement with potential grantees from underserved communities and institutions. NEH's experience administering its ARP programs emphasized the need for a more coordinated and strategic effort to reach underserved organizations and institutions.

NEH's branding strategy has also been hindered by the American public's perception of the term "humanities," which is widely associated with academia and may discourage potential applicants who are not affiliated with higher education and who do not see themselves as eligible for NEH support. Further, a 2019 study by the American Academy of Arts and Sciences indicated that 51 percent of American adults either "strongly" or "somewhat" agreed that the humanities "attract people who are somewhat elitist or pretentious."¹⁸

b. Action and Intended Impact on Barrier

In fall 2022, NEH will hire a Director to establish an Office of Outreach that will centralize the agency's outreach efforts and expand its engagement with underserved communities and institutions, such as Tribal Nations, HBCUs, HSIs, TCUs, veterans, and community colleges. The Office will be staffed by outreach specialists with experience in grantmaking who will:

- Use data collected by the Office of Data & Evaluation to inform outreach strategies;
- Identify new methods of agency outreach, in coordination with NEH's Office of Communications and Office of Publications, program divisions, staff working groups on HBCUs and Tribal Nations, and the network of 56 state and jurisdictional humanities councils;
- Conduct regular consultations with underserved communities and institutions to identify constituents' needs;
- Strengthen the agency's engagement with Tribal Nations and TCUs, in furtherance of President Biden's January 26, 2021, Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships;¹⁹

¹⁸ See "Survey of the Humanities in American Life," American Academy of Arts and Sciences, 2019, <https://www.amacad.org/sites/default/files/publication/downloads/The-Humanities-in-American-Life.pdf>

¹⁹ <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/26/memorandum-on-tribal-consultation-and-strengthening-nation-to-nation-relationships/>

- Expand the agency’s roster of peer reviewers to include greater participation from members of underserved communities and institutions;
- Create a dedicated helpline for smaller organizations and first-time applicants to the agency’s grant programs;
- Devise targeted outreach workshops in conjunction with NEH program staff for smaller organizations and first-time applicants;
- Build outreach networks with nongovernmental partners that are trusted by underserved communities, such as associations and smaller conferences; and
- Collaborate with other Federal grantmaking agencies on outreach strategies.

From June 2022 to March 2023, the Equity Task Force working group focusing on Action #2 will develop an implementation plan for the launch of the Office of Outreach.

NEH’s Office of Communications will concurrently develop a one-year strategic plan (March 2023–March 2024) for the agency’s branding, website, and social media tools to broaden access to NEH programs for all Americans. The Office will:

- Use data collected by the Office of Data & Evaluation to implement a marketing strategy that raises the profile of the agency, including its funding opportunities, beyond the agency’s traditional audiences to increase geographic, language, and socioeconomic diversity of applicants to NEH programs;
- Enhance the agency’s social media presence and advertising opportunities in social media, print, and broadcast media to increase its reach with underserved audiences;
- Consider expanding the agency’s digital engagement staff to better serve online audiences and maximize the agency’s reach and presence across social media platforms;
- Review potential redesign strategies for the agency’s website and logo to make information more accessible and reduce barriers to participation;
- Develop Spanish and American Sign Language media tools or translation services to reach a wider population of potential grant beneficiaries and contributors to the humanities fields;
- Support the Office of Outreach in implementing interactive information sessions on the agency’s programs; and
- Collaborate with other Federal grantmaking agencies to heighten awareness of the agency’s programs.

c. Tracking Progress

The Equity Task Force working group focusing on Action #2 will develop an implementation plan for the launch of the Office of Outreach from June 2022 to March 2023. The working group will engage regularly with members of NEH’s Office of Communications; the National Council on the Humanities; the agency’s network of 56 state and jurisdictional humanities councils; and representatives of communities and institutions that have been historically underserved by NEH, as appropriate. The implementation plan for the Office of Outreach will include short- and long-term progress metrics, such as reporting to the Chair, senior leadership, the National Council on the Humanities, and stakeholders at every meeting of the National Council. In March 2023, the working group will submit the implementation plan and report on its findings to the Chair, senior leadership, and the National Council.

As described above, NEH’s Office of Communications will develop a one-year strategic plan (March 2023–March 2024) for the agency’s branding, website, and social media tools that aims to broaden access to NEH programs to all Americans. The strategic plan will include short- and long-term metrics to measure progress. The Office of Communications will submit the strategic plan to the Chair, senior leadership, and the National Council by March 2023.

By FY 2025, NEH aims to demonstrate a measurable increase in representation from members of Tribal Nations, HBCUs, HSIs, TCUs, veterans, and community colleges among (1) applicants to the agency’s grant programs and (2) the agency’s roster of peer reviewers. NEH also aims to demonstrate a measurable increase in engagement—through its website, social media platforms, and other communications tools—with members of these groups as well as other communities and institutions that have been historically underserved by the agency.

NEH will utilize data from its forthcoming Office of Data & Evaluation to track these outcomes.

d. Accountability

Once hired, the Director of the Office of Outreach will lead the working group focusing on Action #2. NEH will identify two senior staff members from the agency’s program and administrative offices to lead the working group in the interim and support the new Director once appointed. The Director will meet regularly with NEH leadership to discuss the work of the group. The agency will report on its overall progress on outreach in internal and external communications, as appropriate. The Director will provide reports to the Chair, senior leadership, the National Council on the Humanities, and relevant stakeholders on the development of the agency’s outreach strategies before every meeting of the National Council (which meets at the call of the Chair but may not meet less often than twice during each calendar year).

A senior staff member from the Office of Communications will lead the agency’s strategic branding initiative and meet regularly with NEH leadership. The agency will report on the agency’s overall progress on branding in internal and external communications, as appropriate.

NEH will also incorporate these actions and other equity goals into NEH’s forthcoming FY 2022–2026 strategic plan.

Action 3: Simplifying NEH’s Grant Application Process

a. Barrier to Equitable Outcomes

Federal grant regulations are inherently complex, especially for new and inexperienced applicants. Working within the Government-wide Uniform Guidance for grantmaking,²⁰ NEH staff have strived to simplify NEH's NOFOs. Nevertheless, the agency's grant application process remains highly technical and may stand as a barrier to participation for institutions and individuals without the resources to navigate the process. This puts potential applicants from underserved communities, mid-sized and small institutions, and first-time applicants at a disadvantage, as they often lack experienced grant writers who are familiar with the Uniform Guidance.

Other possible deterrents for potential applicants include the requirement that an applicant set up multiple accounts (*e.g.*, on SAM.gov and Grants.gov) to submit applications as well as variations in policies among peer agencies, *e.g.*, NEH, the National Endowment for the Arts (NEA), the Institute for Museum and Library Services (IMLS), the National Institutes of Health (NIH), and the National Science Foundation (NSF).

b. Action and Intended Impact on Barrier

In June 2022, NEH will launch a nine-month review of its grant application processes to identify systemic barriers to equity. NEH will convene a working group that will:

- Utilize data on applicants' success in applying to NEH programs collected by the Equity Task Force working group focusing on Action #1;
- Collaborate with the agency's Office of the General Counsel and Office of Grant Management, as well as other Federal grant-making agencies, to provide recommendations to OMB to modify the regulatory environment for Federal grants;
- Convene an advisory group of experts to assess any implicit or explicit biases in the agency's NOFOs and grantmaking process and suggest more inclusive alternatives; and
- Develop guides and other outreach tools on the agency's grant application process in collaboration with the agency's planned Office of Outreach.

As discussed above, the proposed Office of Outreach will also create a dedicated helpline for smaller organizations and first-time applicants and devise targeted outreach workshops in conjunction with NEH program staff.

e. Tracking Progress

The Equity Task Force working group focusing on Action #3 will conduct a nine-month review of its grant application processes from June 2022 to March 2023. The working group will engage regularly with members of the National Council on the Humanities; the agency's network of 56 state and jurisdictional humanities councils; and representatives of communities and institutions that have been historically underserved by NEH, as appropriate. In March 2023, the working group will submit a report on its findings to the Chair, senior leadership, and the National Council on the Humanities. The report will identify systemic barriers to equity in Federal grantmaking regulations and NEH's grant application processes and set forth the agency's actions and proposals to remove these barriers.

²⁰ 2 C.F.R. part 200.

NEH will assess its progress by analyzing the pool of grant applicants to future funding opportunities. The agency strives to foster larger, more diverse populations of grant applicants and award recipients.

f. Accountability

NEH will identify two senior staff members from the program and administrative offices to lead the working group described above; they will meet regularly with NEH leadership to discuss the work of the group. The agency will report on its overall progress on improving the grant application process in internal and external communications, as appropriate.

NEH will also incorporate these actions and other equity goals into NEH’s forthcoming FY 2022–2026 strategic plan.

Action 4. Expanding NEH’s Procurement Opportunities

a. Barrier to Equitable Outcomes

NEH intends to use its procurement and contracting opportunities to deepen its support for small businesses that are owned by members of underserved communities.

The agency’s procurement policy, however, must comply with the rules set forth in the Federal Acquisition Regulation (FAR).²¹ The FAR recognizes certain categories of small businesses as eligible for targeted support, such as those owned by women or veterans, but it omits many other underserved communities that NEH also seeks to benefit.

The Federal government’s experience with equity-focused procurement programs, such as the Women-Owned Small Business Program and the Vets First Contracting Program, demonstrates the effectiveness of such programs in advancing DEIA. Therefore, NEH intends to coordinate with other agencies to amend the FAR to expand Federal procurement opportunities for underserved communities.

b. Action and Intended Impact on Barrier

An update to Parts 2 and 19 of the FAR would allow NEH broader leeway to support underserved communities through its procurements and contract awards. NEH will outline a plan to compile recommended updates to the FAR so that it addresses a broader range of underserved communities.

Additionally, NEH will conduct outreach to vendors owned by members of historically underserved communities to identify potential concerns regarding the availability of contracting opportunities. The agency will seek to better understand the barriers underserved communities face in conducting business with NEH and will discuss best practices to eliminate them.

c. Tracking Progress

The Equity Task Force working group focusing on Action #4 will coordinate this effort with relevant Government contracting groups, such as the Small Agency Council Procurement

²¹ Title 48 of the Code of Federal Regulations.

Committee and the Chief Acquisition Officers Council, as well as groups that include Government and industry representatives, such as the Government Business Council. To the extent permitted by Federal law and the FAR, NEH will collect and track demographic information for its contractors and suppliers. NEH intends to use the information it collects to establish metrics for its support of underserved communities and individuals in procurement and contracting.

Ultimately, NEH intends to participate in appropriate updates to the FAR that will promote equity in acquisitions across Government.

d. Accountability

NEH will identify senior staff to lead the working group described above; they will meet regularly with NEH leadership to discuss the work of the group. NEH will compile recommended updates to the FAR, as discussed above, by March 2023. NEH will also incorporate these actions and other equity goals into NEH’s forthcoming FY 2022–2026 strategic plan.

Primary Points of Contact

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