NHA Letter on NEH Long-Term Projects (Written in response to NEH Policy Paper on Long-Term Projects issued 9/25/00)

16 October 2000

Dr. John Roberts
Deputy Chairman
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1100 Pennsylvania Avenue, NW
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Dear John:

I write in response to your September 25 letter requesting comment on an NEH policy options paper on long-term projects. As I mentioned when we spoke at the folklore meeting, NHA has sent copies of the policy options paper to each of our 85 members. We encouraged our members to send separate comments to NEH, and to NHA for inclusion in our comments. In the following we have attempted to characterize the range of views received from our constituency.

First, three comments on the general framework in which this policy change is under consideration:

- · While questions in Congress and elsewhere about long-term projects in terms of productivity and incentives to conclude projects would probably be with us regardless of available funding, without doubt the rolling impact of the 1995 cuts is the catalyst for the present policy review. A consequence of the \$67 million reduction in NEH funds administered by Congress in 1995 is that the agency's grant-making ability has been shortchanged by more than \$300 million since 1995.
- · The NEH options paper maintains a neutral tone as to the value of the long-term projects -- Perhaps that is seen as necessary in this type of exercise. Nonetheless, many of us were struck by the absence of recognition that by most measures, the long-term projects supported by NEH are extraordinarily valuable. Fifty years from now, when the success of NEH is measured in terms of contributions to the American people as well as to scholarship, the long-term projects are likely to be among the most visible.
- \cdot Even in its reduced circumstances from which we trust the agency is moving into a more dynamic rebuilding period, it is important that NEH be recognized as a source of support for innovative research in the humanities. While limiting support for the long-term projects may be seen as freeing resources for new projects, NEH can also look to other areas for the same fine tuning of its grant-making. Some will read the options document against the 10/6/00 Chronicle of Higher Education article on NEH and conclude that NEH is less interested in scholarship than it was in the past.

The following comments are organized about the six policy considerations presented in the options paper on page 8:

1. "Should the Endowment limit long-term projects to NEH matching funds, thus requiring projects to seek higher levels of third-party support?"

The NHA recognizes that on the one hand the long-term projects include many of the most important and long lasting contributions of the NEH to preserving and making accessible America's heritage, and that on the other, as a consequence of deep budget cuts, the support structure for these projects can not be maintained as in the past because to do so leaves too little for other scholarly activities.

We do not agree with a change to a policy providing only matching funds to long-term projects. Rather, we would suggest a more nuanced policy that is flexible, moves toward increased matching in steps, takes into account both financial and in-kind contributions of host institutions, and also takes into account the financial position and fund-raising record of each grantee..

2. "Within each NEH division where long-term projects are funded, should the panel review system be structured in such a way that applications from these projects compete against one another for further funding?"

In theory, with stronger appropriations, the NEH might be able to handle the long-term projects in a single panel. One should remember, however, that the long-range projects bring staff with broad expertise and records of bringing access and new insights into the cultural heritage. (If the effort to lighten the NEH commitment to these projects results in setting many of them adrift, serious questions could be raised as to why the federal government should operate a special agency charged with preserving the national historical and cultural heritage.) To place the projects in a tight, necessarily underfunded competition to compete only with each other seems a sure way to set many of them adrift.

3. "In grant-making divisions that support long-term projects, should the Endowment establish discrete programs with their own funding allocations for such projects?"

As noted above, even with the second increase in two years, NEH funding is still very anemic in the areas of research, education, and public programs due to allocation decisions taken at the time of the huge cuts. One could say the same about challenge grants but the problems there have more distant origins. Consequently, we do not think that discrete program funding allocations would improve the situation at this time.

4. "Should NEH limit its support for long-term projects to a specified number of years, number of grants, or amount of cumulative funding?"

At noted above, we believe that a federal agency supporting scholarly and cultural activities should, better than any other funding entity, be able to shepherd through very long term projects -- Stability and non-trendiness should characterize federal involvement. The National Science Foundation, with its very different appropriations experience is a model here.

While not limiting projects by years, number of grants, or cumulative funding, NEH should work with the projects to identify and agree upon timetables, realistic goals for non-federal funding, and other steps that may increase productivity. But the projects are diverse and these steps should reflect the realities of each.

In our view, the formula proposed earlier and mentioned on page 4 of the NEH document (i.e., projects that have been supported for six or more years would be eligible for matching funds awarded on a dollar-for-dollar basis, with the matching requirement doubling to two-for-one at the twelve-year mark) would be damaging for many of the projects. On the other hand, more flexible formulas could be made to work if the schedule were stretched and matching phased in with a broader spectrum (e.g., matches of two or three federal to one private dollar in early stages).

5. "Should the Endowment limit support for long-term projects to the NEH Challenge Grants program after such a project has received grants in other programs for a specified

number of years, been awarded a specific number of grants, or reached a certain level of total NEH funding?"

Using the Challenge Grant program in this way (as a mandatory way for continued NEH support after a certain time) would not be useful for long-term projects and would make awards to other challenge grant applicants even more difficult to obtain. Challenge matching requirements of \$3 or \$4 private funds for each federal dollar would probably end all if not most of the long-term projects.

6. "Should the Endowment maintain the status quo by continuing to support long-term projects the way it currently does?

No, as noted above, we recognize that the present situation calls for NEH to free more of its funds for new research opportunities. (It should be noted that several members have expressed concern that funds "saved" by re-configuring long-term projects might end up supporting activities in other programs of NEH -- They would like to see a guarantee that all savings would go into new research awards). But we caution that the documentary editing projects are prominent among the most important activities of NEH. For most of those projects, an all matching, no outright funds configuration would probably seriously slow the project and in some cases divert key editorial personnel to fund raising. We do think that a slowly diminishing level of outright support, combined with increasing matching requirements could work -- especially if administered flexibly so that projects less prepared to go this route can have more time to prepare.

Finally, my colleagues and I are very pleased that the agency has requested comment from the public on this issue. I hope that the agency will continue the practice, preferably with a longer turnaround for comment, whenever significant policy changes are under consideration.

Sincerely yours,

John Hammer Director