



NATIONAL ENDOWMENT FOR THE HUMANITIES

OFFICE OF THE CHAIR

PRIVACY IMPACT ASSESSMENT

Instructions: As per the E-Government Act of 2002, the agency must perform a Privacy Impact Assessment (PIA) before: (a) developing or procuring IT systems or projects that collect, maintain or disseminate information in identifiable form from or about members of the public, or (b) initiating, consistent with the Paperwork Reduction Act, a new electronic collection of information in identifiable form for 10 or more persons (excluding agencies, instrumentalities or employees of the federal government). As per OMB M03-22, this PIA should be updated when major changes are made to an existing system or when new external disclosure reasons are deemed appropriate.

The key to a successful PIA is to ensure that the public is informed of exactly what we will be doing with their private information. The System Owner will conduct an initial PIA for new systems before it goes in use and review the PIA annually thereafter.

The agency's Senior Agency Official for Privacy (SAOP) and Chief Information Officer (CIO) must approve the PIA before the system can be put into use. Approved PIAs will be posted on the NEH privacy page.

Name of System:	General Support System (GSS)
Date of this PIA:	July 7, 2025
Notes:	As per the NEH PIA policy, PIAs must be reviewed annually, updated when new disclosure reasons are deemed appropriate, and re-assessed when a major system update occurs. NEH continues to store the same information and deploy the same safeguards referenced in its last PIA dated July 18, 2024.
Name and Office of Person(s) Interviewed for PIA	Jason Hammond (System Owner) was interviewed by Beth Stewart (Director of OIT), on 07/07/2025.
Brief Description:	This system includes the typical business productivity applications like Word, Excel, Outlook, as well as the network/server/printer infrastructure.
Inventory of SORNs updated?	The NEH SORNs have been reviewed and updated as necessary to include all collections of PII hosted in the GSS. The GSS does not have a specific SORN.
Who is the Audience (e.g., what kinds of individuals will be providing us with information about themselves?)	The GSS isn't intended to collect information from any particular audience. However, as a general collection of information in many forms (e-mails, memos, etc.), there is information about the daily business of the NEH. This would include our interaction with grantees, applicants, panelists, agency employees, and other government agencies and private companies with whom we do business.

What information is to be collected (e.g., names, addresses, phone numbers)?	As a general system, the GSS wasn't designed to collect specific information. That said, data stored in this system would certainly include names, addresses, phone numbers, SSNs, and other pieces of PII data.
Why is the information being collected?	The information is collected to facilitate the day-to-day operations of the agency.
What is the intended use of the information?	The information is used in the daily business of processing grants, communicating with other agencies and the private sector.
With whom will the information be shared (e.g., another agency for a specified programmatic purpose or another NEH office?)	The information in GSS is not systematically shared. That said, information generated by staff is certainly shared on an ad-hoc basis (e.g., a press release might be written in the GSS and then posted on the agency website, e-mails are sent to grantees and others, etc.).
Does the system describe to the audience exactly what we will do with the information we collect from them?	GSS is not a public-facing system and does not have a specific audience. There are SORNs for collections of public data which describe what we do with the information.
Does the system provide assurances to the audience that we will not use their information for anything other than the clearly stated purpose?	GSS is not a public-facing system and does not have a specific audience. There are SORNs published for collections of public data which include assurances that collected information will be used appropriately.
What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	N/A- GSS is not a public-facing system and does not have a specific audience. However, there is an NEH Privacy Act Regulations publicly accessible webpage that describes how individuals may exercise rights granted by the Privacy Act.
How will the information be secured (e.g., administrative and technological controls)?	The GSS system is secured according to NIST guidelines and is subject to annual FISMA review. Regarding privacy, the NEH has a privacy policy (M-111, "Safeguarding Personally Identifiable Information") that governs how users should treat PII. This policy is included in yearly security training.
Is a system of records being created under the Privacy Act, 5 U.S.C. 552a.?	No, the GSS is not itself a "system of records" under the Privacy Act, because it is not "a group of . . . records . . . from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual." 5 U.S.C. 552a(a)(5).
If not, how will you store federal records created by this new system?	Records are being stored and managed according to the agency's approved records schedule.
Comments. Please use this space to provide any additional comments or analysis about this system.	The GSS assessment of NIST 800-53 Rev 4 Security Controls include a suite of Privacy Controls related to Appendix J.
Signature and date of NEH Staff Member who Performed this PIA.	<div> <div> <i>Jason Hammond</i> Jason Hammond (Jul 7, 2025 11:50 EDT) </div> <div> Date Jul 7, 2025 </div> </div> <div> Jason Hammond System Owner </div>

<p>This PIA is determined by the Senior Agency Official for Privacy (SAOP) as Approved/Not Approved. Signature and date.</p>	<p><input checked="" type="checkbox"/> Approved <input type="checkbox"/> Not Approved</p> <p><u><i>Kimberly Hylan</i></u> Date <u>Jul 8, 2025</u> <small>Kimberly Hylan (Jul 8, 2025 14:27 EDT)</small></p> <p>Kimberly Hylan Senior Agency Official for Privacy Office of the General Counsel</p>
<p>This system is determined by the Chief Information Officer (CIO) as Approved/Not Approved. Signature and date.</p>	<p><input checked="" type="checkbox"/> Approved <input type="checkbox"/> Not Approved</p> <p><u><i>Beth Stewart</i></u> Date <u>Jul 8, 2025</u> <small>Beth Stewart (Jul 8, 2025 14:30 EDT)</small></p> <p>Beth Stewart Acting Chief Information Officer (CIO) Office of the Chair</p>



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Name of System:	Electronic Grants Management System (eGMS)
Date of this PIA:	May 27, 2025
Notes:	NEH continues to store within eGMS the same information, and deploy the same safeguards, referenced in its last PIA for eGMS (dated May 22, 2024).
Name and Office of Person(s) Interviewed for PIA	Statements from previous PIAs are included in this PIA. Beth Stewart (System Owner) interviewed Christopher Mureithi (Development Lead) for this annual review.
Brief Description:	This is the web-based grants processing system.
Inventory of SORNs updated?	The NEH-1 SORN has been reviewed and is being updated as necessary to include all collections of PII hosted in eGMS.
Who is the Audience (e.g., what kinds of individuals will be providing us with information about themselves?)	(1) Individuals who have applied to NEH for financial assistance; (2) in the case of organizations who have applied to NEH for financial assistance, the organization's designated grant administrator and/or project director, as well as other individuals affiliated with the applicant; (3) individuals that have applied to, or received financial assistance, from NEH grantees, including fellows and subgrantees; (4) individuals who have attended NEH-funded seminars; (5) individuals who have applied to or have served as application review panelists; (6) individuals associated with organizations who partner with NEH in

	grant programs; and (7) individuals who serve or have served as members of the National Council on the Humanities.
What information is to be collected (e.g., names, addresses, phone numbers)?	Names of individuals, Social Security numbers and payment information (only for those grant applicants and panelists receiving payment from NEH), U.S. citizenship status, race and ethnicity (no longer actively collected), email address, telephone, home and work address, current institutional affiliations, categorical information on disciplines and expertise, and NEH subscriptions. In addition to these records, eGMS contains grant applications, materials associated with NEH-issued awards and written communications between NEH and grantees. Finally, eGMS contains information pertaining to NEH peer review panels, including the identity of panelists, notes and evaluations, and travel reimbursement information.
Why is the information being collected?	NEH collects this information so that it may effectively review applications for federal financial assistance, including by coordinating the review of application review panelists, and administer awards.
What is the intended use of the information?	NEH staff members, panelists, and grantees use eGMS to evaluate applications to NEH for federal financial assistance, manage active grants and cooperative agreement awards, and communicate with grantees. NEH's financial management system draws upon contact and other information within eGMS to process the disbursement of grant funds to grantees as well as the payment of honoraria and travel expenses to panelists.
With whom will the information be shared (e.g., another agency for a specified programmatic purpose or another NEH office?)	<p>(1) With limited exception described below, NEH limits access to eGMS to internal use among program staff, grant management personnel, and accounting technicians.</p> <p>(2) NEH publicly discloses on its website limited information pertaining to funded projects, and often announces successful grant applicants to Congress and via press release.</p> <p>(3) NEH provides extracts from eGMS to other government organizations as required by the DATA Act.</p> <p>(4) NEH application review panelists and council members have limited access to eGMS. They may access eGMS to review grant applications assigned to the panels on which they have been asked to serve, update their personal information, and upload evaluations and provide information needed to facilitate payment from the agency for their services.</p> <p>(5) NEH grantees (i.e., those who have received NEH awards) also have limited access to eGMS. Specifically, they may access certain records pertaining to projects of which they are affiliated or pertaining to them individually.</p>
Does the system describe to the audience exactly what we will do with the information we collect from them?	<p>(1) Through the relevant grant application guidelines, NEH explains that it is collecting all information sought in the grant application for the principal purpose of processing the grant application and further discloses that it may use the information for statistical research, analysis of trends, and Congressional oversight.</p> <p>(2) In addition, when collecting financial information for entry into</p>

	eGMS, NEH makes clear to individuals providing such information that it is collecting it for the purpose of facilitating payment to the individual's financial institution.
Does the system provide assurances to the audience that we will not use their information for anything other than the clearly stated purpose?	eGMS includes links to the NEH Privacy Policy published on the agency website.
What opportunities do individuals have to decline to provide information or to consent to particular uses of the information?	All NEH information collections pertaining to this system are in a sense voluntary as all those providing NEH information maintained in eGMS (grant applicants, peer review panelists, council members) freely apply for financial assistance from the agency, seek engagement on an NEH peer review panel, or accept a position on the NEH National Council.
How will the information be secured (e.g., administrative and technological controls)?	<p>NEH limits access to records within this system to authorized personnel whose official duties require such access. For example, NEH limits the access of its program staff to those functions necessary to processing and evaluation of applications. NEH limits the access of its grant management staff to those functions necessary to managing active grants and disbursing funds.</p> <p>NEH provides limited access to this system to grantees and peer review panelists for the limited purpose of accessing and uploading documents associated with their award and panel service. NEH provides grantees and peer review panelists with individual eGMS accounts to which it restricts access to grants and applications for which the individual has an assigned role.</p> <p>Agency staff accessing eGMS are authenticated via an individually assigned staff account. Once authenticated, NEH restricts access within eGMS using role-based tools and permissions. The eGMS steering committee has defined eGMS-supported roles.</p> <p>Roles include:</p> <ul style="list-style-type: none"> • Program staff (access to application intake and pre- Council functions, and limited access to post-council functions) • Grants Management staff (access to award processing and other post-Council functions) • Public Affairs staff • Administrator group • Limited access group (read-only) • Grantees (access to grants and other documents associated with projects for which they are affiliated) • Panelists and National Council Members (access to applications and other documents associated with projects to which they have been assigned to review)

Is a system of records being created under the Privacy Act, 5 U.S.C. 552a.?	Yes: See Vol 82, No. 79, F.R. 19264 SORN, as corrected at Vol. 87, No. 31, F.R. 8616 for NEH-1.
If not, how will you store federal records created by this new system?	N/A
Comments. Please use this space to provide any additional comments or analysis about this system.	eGMS uses security and privacy controls as outlined in NIST 800-53 Rev 4.
Signature and date of NEH Staff Member who Performed this PIA.	<u><i>Christopher Mureithi</i></u> Date <u>Jul 18, 2025</u> <small>Christopher Mureithi (Jul 18, 2025 10:56 EDT)</small> Christopher Mureithi Development Lead, Office of Information Technology
This PIA is determined by the Senior Agency Official for Privacy (SAOP) as Approved/Not Approved. Signature and date.	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Not Approved <u><i>Kimberly Hylan</i></u> Date <u>Jul 18, 2025</u> <small>Kimberly Hylan (Jul 18, 2025 11:12 EDT)</small> Kimberly Hylan Senior Agency Official for Privacy Office of the Chair
This system is determined by the Chief Information Officer (CIO) as Approved/Not Approved. Signature and date.	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Not Approved <u><i>Beth Stewart</i></u> Date <u>Jul 18, 2025</u> <small>Beth Stewart (Jul 18, 2025 11:25 EDT)</small> Beth Stewart Acting Chief Information Officer (CIO) Office of the Chair