

Reinstatements of Terminated Awards Frequently Asked Questions

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Section 1: General Reinstatement Process

1. Why is National Endowment for the Humanities (NEH) reinstating terminated awards?

NEH is reinstating terminated awards in compliance with the court order issued by a federal judge in the Southern District of New York (see *American Council of Learned Societies v. National Endowment for the Humanities, et al.*, 1:25-cv-03657 and *The Authors Guild v. National Endowment for the Humanities, et al.*, 1:25-cv-03923), dated May 7, 2026.

2. What do I need to do if I want to reinstate my award?

You must complete the following steps to reinstate your award:

1. Submit the Reinstatement Assurance Form (RAF) within the timeframe established by NEH.
2. Respond to any follow-up questions or requests for additional information from NEH regarding the project, budget, personnel, or revised period of performance.
3. Receive a revised Notice of Action (NoA) from NEH, formally reinstating the award and establishing the revised period of performance and reporting requirements.

Do not assume an award has been reinstated until NEH issues the revised NoA. Once NEH issues the revised NoA, you may resume project activities and draw funds.

3. What is the Reinstatement Assurance Form?

The Reinstatement Assurance Form is the method NEH uses to assess a recipient's intent and ability to successfully resume and complete a terminated award.

All recipients seeking reinstatement must submit the form before NEH can reinstate the award.

The form requests information regarding:

- the recipient's intent to continue the project;
- the organization's current capacity to administer the award;
- the availability of key personnel and authorized officials responsible for project, financial, and reporting activities;

- any anticipated changes to the project scope, activities, or budget; and
- the recipient's ability to complete the project within a revised period of performance.

NEH will review the form to determine:

- whether the award can be reinstated;
- whether revisions to the project, budget, personnel, or award terms are necessary; and
- what revised period of performance and reporting requirements are appropriate.

NEH may contact you for additional information or to discuss potential modifications before reinstating the award.

4. Who is responsible for completing, certifying, and submitting the Reinstatement Assurance Form?

The designated institutional grant administrator (IGA), must complete, certify, and submit the Reinstatement Assurance Form. The IGA serves as the primary contact and has authority to act on the recipient's behalf in matters related to the administration of NEH awards.

If your award is to an individual recipient (fellow, scholar, summer stipend, etc.), only the individual recipient listed on the NEH award has the authorization to complete, certify, and submit the Reinstatement Assurance Form.

5. How do I request a change in the IGA before submitting the Reinstatement Assurance Form?

Send a request to grantmanagement@neh.gov. You must include the IGA's name (including prefix), title, physical address, and email address.

6. When is the Reinstatement Assurance Form due?

NEH requests you submit the RAF through eGMS Reach no later than 30 days after you receive the email from NEH notifying you of the reinstatement process. Early submission will help NEH review requests and process reinstatements as quickly as possible.

7. Can I request additional time to submit the Reinstatement Assurance Form?

NEH requests that recipients submit the RAF within 30 days of receiving reinstatement notification.

Recipients may submit the RAF at any time through November 30, 2026, without requesting an extension or notifying NEH.

Recipients requesting submission after November 30, 2026, must contact NEH Office of Grant Management at grantmanagement@neh.gov.

8. What happens if I do not respond to NEH?

If you don't respond to NEH's offer to reinstate your award by November 30, 2026, NEH may close out the award. In such a case, NEH will use the effective termination date, April 4, 2025, as the period of performance end date for your award.

9. Can NEH deny reinstatement of an award?

Yes. NEH will work with you to resolve issues identified during the review process. However, in some circumstances NEH may not be able to reinstate your award.

For instance, NEH may deny reinstatement when:

- you propose a material change in the scope that alters your project such that it no longer reasonably be considered the same project that was originally approved and are unable to successfully negotiate a resolution with NEH, or
- your organization is unable to appropriately identify qualified individuals to carry out the project.

10. When can I expect NEH to reinstate my award?

NEH will process reinstatement requests in the order it receives the Reinstatement Assurance Forms. Given the high volume of awards and limited staffing capacity, it may take NEH several months to complete all reinstatements.

Section 2: Project Scope and Period of Performance

11. Why isn't NEH restoring my original period of performance?

NEH is not restoring your original period of performance dates because it would result in a significant reduction in the amount of active time available to successfully carry out your project activities. Many awards only had a few months remaining when NEH

terminated them in April 2025. These awards would not have any time remaining when NEH processes reinstatements.

NEH will extend the period of performance end date to provide reasonable time to restart the project and complete remaining project activities.

The extended period of performance end date is necessary because under 2 CFR Part 200, recipients may only incur allowable costs during the authorized period of performance. Without revising the dates:

- recipients could be prohibited from incurring new costs;
- recipients could lack authority to continue work; and
- reimbursements could be questioned during audit.

12. How will NEH determine my revised period of performance?

NEH will calculate the new period of performance end date based on:

- i. a three (3) month restart period;
- ii. the amount of time remaining on the award when NEH terminated it in April 2025; and
- iii. the date NEH reinstates the award.

i. Restart Period: NEH will provide reinstated awards with a three (3) month restart period to allow recipients time to resume project activities. The restart period provides a reasonable amount of time to:

- engage personnel, contractors, and subrecipients responsible for carrying out the project;
- re-establish project operations and activities, such as scheduling and procurement; and
- complete administrative, financial, and compliance activities associated with the award.

ii. Extension Period: The extension period is based on the amount of time that remained in the original period of performance at the time of NEH termination.

Time Remaining on Award at Termination	Restart and Extension Period
4 months or less (120 days or fewer)	3 months restart period + 4 months extension = 7 months total

5 months to 12 months (121 days to 365 days)	3 months restart period +12 months extension = 15 months total
Greater than 12 months (more than 365 days)	3 months restart + an extension equal to the amount of time the award remained inactive between termination and reinstatement

iii. Reinstatement Date: NEH will calculate the full length of your extension and add it to your reinstatement date. The reinstatement date is the last date of the month in which NEH completes reinstatement processing of your award. The new period of performance end date is calculated by adding the restart period and the extension period from the reinstatement date.

NEH will specify the new period of performance end date for your reinstated award in the revised Notice of Action.

Example 1 – Four (4) months or less remaining at termination

Original period of performance end date: July 31, 2025

Award termination date: April 4, 2025

Time remaining on the award at termination: 4 months

Under the reinstatement policy, NEH will extend this award as follows:

- 3-month restart period, plus
- 4-month extension

Total extension: 7 months

Revised period of performance end date calculation:

- Reinstatement date: June 30, 2026
- Add 7 months
- New period of performance end date: January 31, 2027

Example 2 – Five (5) to twelve (12) months remaining at termination

Original period of performance end date: March 31, 2026

Award termination date: April 4, 2025

Time remaining on the award at termination: 12 months

Under the reinstatement policy, NEH will extend this award as follows:

- 3-month restart period, plus
- 12-month extension

Total extension: 15 months

Revised period of performance end date calculation:

- Reinstatement date: July 31, 2026
- Add 15 months
- New period of performance end date: October 31, 2027

Example 3 – More than Twelve (12) months remaining at termination

Original period of performance end date: April 30, 2026

Award termination date: April 4, 2025

Time remaining on the award at termination: 13 months

Reinstatement date (when NEH completes processing): August 31, 2026

Time between termination and the reinstatement date (inactive period): 16 months

Under the reinstatement policy, NEH will extend this award as follows:

- 3-month restart period, plus
- An extension equal to the inactive period - 16 months

Total extension: 19 months

Revised period of performance end date calculation:

- Reinstatement Date: August 31, 2026
- Add 19 months
- New period of performance end date: November 30, 2027

13. Can I request a shorter revised period of performance than the extension NEH would otherwise apply?

Yes, you may request a shorter period of performance if you need less time to complete project activities.

14. Can I request changes to my project scope or budget?

Yes, you may request minor changes to your project scope or budget as part of the reinstatement process. NEH will review all changes you request and determine whether they can be approved and incorporated into the reinstated award.

NEH will work with you to evaluate proposed changes and, when necessary, negotiate adjustments to ensure the project remains consistent with the original approved award and can be successfully completed. Routine changes in scope may include:

- Adjusting project staffing while maintaining the same key roles and functions.
- Revising project timelines or workplans to reflect updated scheduling needs.
- Adding or modifying subrecipients, contractors, consultants and/or the work to be performed by such parties.
- Adjusting the implementation methods (e.g. delivery format, tools, or approaches in carrying out approved activities).
- Amending the project activities or deliverables to support the completion of work.

If the proposed changes materially alter the core purpose, objectives, activities, or outcomes of the project, the NEH will conduct additional review before making a determination on reinstatement.

A material change in scope is when a recipient proposes to alter the core elements of the approved project - its activities, objectives, or purpose - as outlined in the original application. Per NEH policy, a material change in scope includes situations such as:

- the project no longer reasonably reflects the project originally reviewed and approved by the Chairman;
- the project would support a substantially different humanities undertaking;
- significant new activities or objectives are introduced that materially change the project; or
- the original approved activities are largely abandoned.

15. Can I change key personnel as part of reinstatement?

You may propose changes to key personnel as part of the reinstatement process while you will work with OGM and NEH program staff. Proposed key personnel changes must still meet the program requirements in the Notice of Funding Opportunity and are subject to program staff review.

16. Will reinstated awards still be eligible for no-cost extensions?

Yes, after NEH reinstates your award, it is still eligible for no-cost extensions beyond the extension period.

You should refer to your General Award Terms and Conditions for prior approval requirements related to no-cost extensions to the period of performance and for instructions on submitting such a change request in eGMS Reach.

Section 3: Costs, Payments, and Funding

17. Can I request reimbursement for costs I incurred on my project during the termination period?

Yes, you may request reimbursement costs for otherwise allowable project costs you incurred during the period in which the award was in a terminated status, provided such costs:

- would have been allowable had the award remained active;
- are consistent with the approved project scope and activities;
- were incurred within the revised period of performance; and,
- have not been paid by other federal sources.

18. I completed my project during the termination period. Can I still request reimbursement?

Yes. In order to do so, you must request reinstatement of the award using the Reinstatement Assurance Form, which will allow NEH to provide access to funds. You will be subject to reporting requirements for the reinstated award.

19. My award does not have any remaining federal funds. Can I still reinstate the award?

Yes. While you will not receive any additional funding, you may request that NEH reinstate the award to complete project activities.

20. Will NEH provide additional funding because of the termination?

No, NEH will not provide additional funding.

21. Do I need to repay termination-related costs previously charged to the award?

No, you may retain prior NEH payments for NEH-approved termination costs.

22. What should I do if I submitted a request for reimbursement of termination-related costs after the deadline and have not received NEH approval?

If you previously submitted a request for reimbursement of allowable costs incurred as a result of NEH's termination of the award after the June 29, 2025, deadline but NEH

has not yet processed that request, you must now submit this as a reimbursement on the reinstated award. You should submit a reinstatement-related claim to seek reimbursement for these costs.

23. Can I incur new costs before NEH finalizes my reinstatement?

Yes, but at your own risk. NEH will not cover new costs you incur before NEH reinstates your award unless NEH subsequently determines they align with the original purpose of the award and are allowable, allocable, and reasonable.

Section 4: Reporting Requirements

24. Will I have a new reporting schedule after reinstatement?

Yes. NEH will reinstate and schedule your required reports based on your revised period of performance.

25. Do I need to submit a final performance report if I decline reinstatement?

No.

26. Do I still need to submit a final Federal Financial Report (FFR) if I decline reinstatement?

Yes, in order to meet financial reconciliation, accounting, and closeout requirements.

Section 5: eGMS and Award Administration

27. How do I check my award balance in eGMS Reach?

You may check your award balance using the Payments tab. The Payments tab allows you to submit payment requests, view past payment requests, payments issued, and the remaining award balance.

28. How will I know if NEH has reinstated my award?

You will receive a message from eGMS Reach indicating that NEH has issued a revised Notice of Action (NoA) reinstating your award.

29. Do I need an active SAM registration for NEH to reinstate my award?

Yes, in accordance with 2 CFR 25.200 (b)(2) all recipients must maintain a current and active SAM registration at all times during which the recipient has an active Federal

award. NEH will not reinstate an award until the organization has an active SAM registration.

30. Who should I contact if I have questions about reinstatement?

Please contact the NEH Office of Grant Management at grantmanagement@neh.gov.