

HISTORIC PRESERVATION FUND

GRANT ADMINISTRATION MANUAL

Guidance & Rules on Managing and Reporting on
HPF Sub-grants



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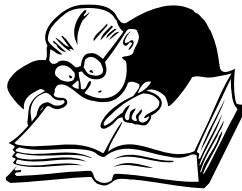
June 4, 2009

This program receives Federal financial assistance for identification and protection of historic properties. Under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975, as amended, the U.S. Department of the Interior prohibits discrimination on the basis of race, color, national origin, disability or age in its federally assisted programs. If you believe you have been discriminated against in any program, activity, or facility as described above, or if you desire further information, please write to: Office for Equal Opportunity, National Park Service, 1829 C Street NW, Washington, D.C. 20240.

The activity that is the subject of the publication has been financed in part with Federal funds from the National Park Service, Department of the Interior, as provided through the Oregon State Historic Preservation Office. However, the contents and opinions do not necessarily reflect the views or policies of the Department of the Interior, nor does the mention of trade names or commercial products constitute endorsement or recommendation by the Department of the Interior.

TABLE OF CONTENTS

I.	Introduction	1
II.	Basic Steps of Grant Administration	1
	Hiring Consultants/Contractors	1
	Program Area Standards	2
	Publications and Public Information	6
	Completing the Progress Report & Payment Form.....	7
	Progress Report and Payment Dates	8
	Final Products	9
	Amendments and Extensions	9
	Final Project Report	10
	Final Project Closeout	10
	NPS Final Project Report Certification	11
III.	General Conditions of Grant	12
	Standards Applicable to Sub-grantees.....	12
	Allowable Costs	13
	Audits	13
	Civil Rights.....	13
	Use of Federal Employees	13
IV.	Special Requirements	14
	1. Federal Administrative Requirements	14
	2. Environmental Requirements.....	14
	3. Public Information Notice of Equal Opportunity	14
V.	Accounting Procedures	15
	1. Salaries and Wages	15
	2. Consultant Services	16
	3. Travel.....	16
	4. Equipment Rental (owned).....	17
	5. Equipment Rental (outside)	17
	6. Materials and Supplies	17
	7. Motor Pool (equipment)	17
	8. Indirect Costs.....	18
	9. Non-Allowable Costs.....	18
	10. Valuation of In-Kind Contributions from Non-Federal Third Parties ..	18
	11. Exclusions in Volunteer Labor Match	20
VI.	In-Field Monitoring	20
Appendices	A. Professional Qualifications Standards.....	21
	B. Timesheets, Volunteer Time Records, Donated Materials Form	23



I. INTRODUCTION

It is very important to read and be familiar with all elements of the Historic Preservation Fund Agreement, as it is the legal document defining your project activities. This Manual lays out additional guidance for managing the grant. Non-compliance with the terms of these documents will cause problems with paying you for your work, and may even jeopardize receiving a grant in the future.

The State Historic Preservation Office (SHPO) administers the Historic Preservation Fund (HPF) Grants-in-Aid program. The program is federally funded through the National Park Service, Department of the Interior. The Oregon SHPO receives an annual grant from the National Park Service, of which the SHPO must distribute a minimum of 10% of the total apportionment to Certified Local Governments. The SHPO may then, at its administrative discretion, distribute the remainder of the funds in the form of sub-grants. These grants must have a 1:1 match, and payment is made on a reimbursable basis.

This funding is a Federal sub-grant, and therefore, you must comply with all Federal laws governing the administration of sub-grants as noted in the HPF Agreement. Additional information on audits, allowable costs, contracting, and federal grant management rules are on the Heritage Programs Division website: <http://www.oregonheritage.org/>, click on "Grants" on the Menu.

II. THE BASIC STEPS OF GRANT ADMINISTRATION

After the HPF Agreement is signed, the steps to be taken toward completing the project goals include some administrative process requirements. Some are common to all projects, and others are related to specific program areas.

1. Hiring Consultants/Contractors.

While the grantee is responsible for all contractors and consultant oversight, federal regulations say SHPO must approve the selection of any consultant or contractor in writing prior to that individual or firm being hired. A consultant or contractor is any individual or firm who is not a staff member on the permanent payroll of the grantee's organization. If you plan to use a consultant or contractor to carry out any tasks in your project, the selection must be consistent with Oregon State policies and the Secretary of Interior's Historic Preservation Professional Qualification Standards. These provisions apply to the hiring of consultants or contractors when the funds to pay their fees are Historic Preservation Grant Funds, or funds used to satisfy the non-federal matching share requirements of an HPF grant. Depending on the project, staff or contractors may be required to meet the Secretary of Interior's standards for historic preservation professionals.

Grantees shall maintain documentation on file to support all hiring and contracting procurements involving Federal and matching funds, including evidence that the services of the consultant are needed and cannot be met by current staff whose salaries are paid in part under the grant. To obtain the required SHPO approval submit the following to the SHPO Grants Coordinator:

- a. A copy of contract solicitations;
- b. A description of the methods of publicizing the solicitations, including dates and places of publication and posting;
- c. Copies of the responses received;
- d. Method and justification of contractor selection;
- e. Justification of the use of negotiation (if used).

SHPO may request that the Grantee check the Consultant’s references, if evidence of this is not submitted with the approval request. This is good hiring practice in any instance. When notice of SHPO approval is received, the contract can be signed. Submit a copy of the signed and dated contract to the SHPO Grants Coordinator.

The Grantee has the responsibility for project completion, as they are under contract with the SHPO. Management of the consultant contract is included in this responsibility. The Grantee needs to maintain regular contact with the consultant to receive progress reports and assure that the agreed upon timeline is being met, and that the products meet their contracted obligations.

All work carried out by the contractor or consultant must be submitted first to the grantee, not to SHPO. When the Grantee approves the work, the Grantee will submit the report, any documents that are products, photos, and the payment request to SHPO. In no case does the contractor or consultant submit work or reports directly to SHPO; drafts for SHPO review must also come from the Grantee.

The standards related to each Historic Preservation Act Program area are below.

HPF Program Area	Standard
Administration	Allowable costs and services must be related to the administration of this grant: application/contract processing, reports, reimbursement requests, etc.

Local Government Certification	Activity in this program area is that which is directly pertinent to certifying local governments as eligible under Section 101(c) of the National Historic Preservation Act. Local governments must develop local historic preservation programs and become certified pursuant to Section 101(c) of the Act. Regulations governing procedures for local government historic preservation programs are published in 36 CFR 61.
Preservation Planning	<ul style="list-style-type: none"> * Prior to starting the preservation-planning project, the grant recipient must receive written approval from the SHPO on the final work plan. * Completed work must be consistent with The Secretary of the Interior's "Standards for Archeology and Historic Preservation," which include the "Standards for Preservation Planning." * Any purchases or contracts for services over \$500 should follow appropriate procurement procedures, including obtaining at least three bids. * The contractor must meet the standards required by the National Park Service. The SHPO must approve the contractor. Please provide copies of the bids, resumes of employees and subcontractors directly involved in the project.
Review and Compliance	<ul style="list-style-type: none"> * Eligible costs and activities include those related to local "design review" as well as to participation with the SHPO in state or federal compliance activities for properties within the local government's boundaries. * Activities and products must be consistent with local, state, and federal preservation standards and guidelines, including the National Register bulletin "How to Apply the National Register Criteria for Evaluation" and the Secretary of the Interior's "Standards for Rehabilitation". * The CLG must maintain records of cases it reviews and the decisions it makes.
Reconnaissance Level Survey	<ul style="list-style-type: none"> * Prior to starting the survey project, the grant recipient must receive written approval from the SHPO on the final work plan. * The completed survey must meet the standards outlined in the SHPO'S "Guidelines for Conducting Historic Resource Surveys in Oregon" (2008 version) and the National Park Services' "Guidelines for Local Surveys: A Basis for Preservation Planning" (1985 revised edition) . Work that does not meet these standards is ineligible for reimbursement. * Originals of all survey materials must be submitted to the SHPO. These include the survey maps, photographs, survey forms, research design, electronic data, and a final report. * The consultant must submit two copies of all survey products, one for the CLG and one for the SHPO. * The contractor must meet the standards required by the National Park Service. The SHPO must approve the contractor. Please provide copies of the bids, resumes of employees and subcontractors directly involved in the project.
Intensive Level Survey	<ul style="list-style-type: none"> * The completed survey must meet the standards outlined in the SHPO'S "Guidelines for Conducting Historic Resource Surveys in Oregon" (2008 version) and the National Park Services' "Guidelines for Local Surveys: A Basis for Preservation Planning" (1985 revised edition) . Work that does not meet these standards is ineligible for reimbursement. * Two copies of all materials should be generated: one for the CLG to keep in its permanent files and one for the SHPO. * The contractor must meet the standards required by the National Park Service. The SHPO must approve the contractor. Please provide copies of the bids, resumes of employees and subcontractors directly involved in the project.

National Register Nominations	<ul style="list-style-type: none"> * The completed National Register documentation must meet the requirements set forth in National Register bulletins (especially "How to Complete the National Register Registration Form" and "How to Apply the National Register Criteria for Evaluation") and the Secretary of the Interior's Standards and Guidelines for Historic Preservation and Archaeology. * Two copies of all materials shall be generated: one for the CLG and one for the SHPO. * The contractor must meet the standards required by the National Park Service. The SHPO must approve the contractor. Please provide copies of the bids, resumes of employees and subcontractors directly involved in the project.
Development (Rehabilitation)	<ul style="list-style-type: none"> * Funds for Development (Rehabilitation) work may only be granted to properties listed on the National Register of Historic Places, or listed as contributing to a National Register Historic District. * Prior to starting the rehabilitation project, the grant recipient must submit a work plan for the project to the State Historic Preservation Office (SHPO) and receive written approval of that work plan, including photos & drawings. * The approved work plan must be used for requesting bids from contractors. Approved procedures for selecting a contractor must be followed, including obtaining at least three bids. * The contractor must meet the standards required by the National Park Service. The SHPO must approve the contractor. Please provide copies of the bids, resumes of employees and subcontractors directly involved in the project. * A signed Preservation Agreement between the Certified Local Government and the property owner is required. A copy of the Agreement must be submitted to SHPO. * The work plan and the actual work must conform to the Secretary of the Interior's "Standards for Rehabilitation". Work that does not meet these standards is ineligible for reimbursement. * A project sign must be displayed in a prominent location at each project site while project work is in progress, acknowledging the grant support from OPRD Heritage Programs Division and the State Historic Preservation Office. * Before and after photographs are required. We also appreciate photos of people at work.
Pre-Development	<ul style="list-style-type: none"> * Prior to starting the pre-development project, the grant recipient must receive written approval from the SHPO on the final scope of work for the project. * Approved procedures for selecting an architect or engineer must be followed, including obtaining at least three bids. * The contractor must meet the standards required by the National Park Service. The SHPO must approve the contractor. Please provide copies of the bids, resumes of employees and subcontractors directly involved in the project. * The CLG must submit to the SHPO copies of all contracts with the consultant(s) for professional services and all reports, drawings, etc. completed for the project. * The work must meet the Secretary of the Interior's "Standards for Rehabilitation."

Public Education	<p>* Prior to starting the public education project, the grant recipient must receive written approval from the SHPO on the final work plan.</p> <p>* The grant recipient must follow appropriate procurement standards for these projects, including obtaining at least three bids for expenditures exceeding \$500.</p> <p>* The contractor must meet the standards required by the National Park Service. The SHPO must approve the contractor. Please provide copies of the bids, resumes of employees and subcontractors directly involved in the project.</p> <p>* Printed publications must include the following Statement of Equal Opportunity and Funding:</p> <p>This publication has been funded with the assistance of a matching grant-in-aid from the Oregon State Historic Preservation Office and the National Park Service. Regulations of the U.S. Department of the Interior strictly prohibit unlawful discrimination on the basis of race, color, national origin, age or handicap. Any person who believes he or she has been discriminated against in any program, activity, or facility operated by a recipient of Federal assistance should write to: Office of Equal Opportunity, National Park Service, 1849 C Street, NW, Washington, D.C. 20240.</p> <p>* SHPO must receive and approve drafts of all long term educational projects (brochures, walking tour maps, interpretive panels, etc.)</p>
Archaeology	<p>Prior to starting the project the grant recipient must develop an appropriate work plan in conjunction with professional staff from the Heritage Programs Division/State Historic Preservation Office, and receive approval of that work plan.</p> <p>All archaeological projects will be carried out in full compliance with applicable laws and regulations, and follow the Guidelines for Conducting Field Archaeology in Oregon, available on the website http://www.oregon.gov/OPRD/HCD/ARCH/index.shtml. All projects involving archaeological fieldwork, including surveys and excavations, will be carried out under the supervision of a professional archaeologist. Any shovel testing or excavation requires a valid Oregon Archaeology Permit. Work that does not meet these standards is ineligible for reimbursement.</p> <p>Credit must be given the State Historic Preservation Office in brochures, news releases, programs, publications, and other printed materials with the following credit line, "This project is being funded in part by a matching grant from the Heritage Programs Division/State Historic Preservation Office." Provide a copy of all materials generated to the State Historic Preservation Office.</p> <p>The contractor must meet the standards required by the National Park Service. The SHPO must approve the contractor. Please provide copies of the bids, resumes of employees and subcontractors directly involved in the project.</p>
Other Preservation Activities	<p>Activities in this program area include any activity that is eligible for HPF assistance but that does not readily fall within one of the Program Areas described above, or involves Multiple Program Areas and the activity cannot reasonably be divided among the specific Program Areas. One example is HABS/HAER documentation projects.</p>

2. Publications and Public Information. It is possible for any of the Program Areas above have related documents published.

a. All grant or match-funded publications, literature, and videos must be reviewed, revised if needed, and approved in draft form by SHPO prior to final publication. This includes context statements, pamphlets, brochures, booklets, etc.

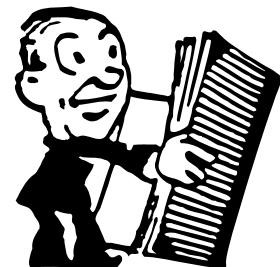
b. Acknowledgment of support. An acknowledgment of NPS support must be made in connection with the publication or dissemination of any printed, audio-visual, or electronic material based on, or developed under, any activity supported by HPF grant funds. This acknowledgment shall be in the form of the following statement:

The activity that is the subject of this [type of publication] has been financed [in part/entirely] with Federal funds from the National Park Service, U.S. Department of the Interior. However, the contents and opinions do not necessarily reflect the views or policies of the Department of the Interior, nor does the mention of trade names or commercial products constitute endorsement or recommendation by the Department of the Interior.

(Only relevant portions of the required statement need to be used as appropriate depending on the content of the publication; e.g., if there are no commercial products, then that part of the statement can be omitted.)

c. Nondiscrimination Statement. Publications and audio-visual materials must also include the following nondiscrimination statement:

This program receives Federal financial assistance for identification and protection of historic properties. Under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975, as amended, the U.S. Department of the Interior prohibits discrimination on the basis of race, color, national origin, disability or age in its federally assisted programs. If you believe you have been discriminated against in any program, activity, or facility as described above, or if you desire further information, please write to: Office for Equal Opportunity, National Park Service, 1849 C Street NW, Washington, D.C. 20240.



d. Public information. Press releases, publications, and any other public

dissemination of information (including electronic materials such as World Wide Web pages) by a grantee made possible by grant assistance shall acknowledge Department of the Interior, National Park Service grant support by use of the above statements.

e. Copies of publications. Upon publication, a minimum of five copies must be submitted to SHPO. Three copies of the publication will be furnished by SHPO to NPS, which will furnish one copy to the Department of the Interior's Natural Resource Library for deposit. Of the copies retained by SHPO, one will be filed with the contract and the other will be placed in the resource library. Publications covered by this section include any publication produced as a result of research or any other work funded in whole or in part by HPF grants, **except** National Register Nominations and Inventories, which conform to their own submission requirements.



3. Completing the Progress Report and Payment Request

This document serves four purposes:

- a. It provides a reference and self-evaluation tool for you, the grantee, to measure your progress in completing the contracted goals and to assure the identification of any problems before they become contract compliance issues.
- b. It tells the SHPO about your progress toward the completion of program goals, identifies technical assistance needs, and whether any contract compliance issues must be addressed.
- c. The report serves as a record of your project in progress, documents the grantee's responsible project operation, and supports the grantee's record of qualifications.
- d. The association of expenditures with project elements verifies the amount you are billing for at the time of the report.

The Report Form follows the work itemization in your application and Agreement. This report is not intended to be a time-consuming procedure. Information to complete it should be collected on an ongoing basis throughout the project. Each report stands on its own. Do not repeat information and

expenditures previously reported.



Original documentation of time sheets, invoices, receipts, etc. must be retained by the grantee for audit examination. Do not send copies to SHPO unless they are specifically requested.

The entire final payment will be withheld until all products are received, and 10% will be withheld until they are approved by SHPO. No more than 50% of the expenditures to date will be paid in any payment, to assure the required 50/50 minimum match.



4. Progress Report Dates

Forms to be used for progress reports will be sent to grantees near the designated report date. The current project progress report form must be used, and all requested information must be entered.

The following schedules and dates must be adhered to, unless the grant is awarded 30 days or less prior to the due date of a progress report. The grantee may then disregard the pending report and submit the next report and payment request, when due. A variance from the above payment schedule may be requested in writing.

The progress report and payment request dates are scheduled as follows:

2009-2010 Grant

October 15	Project report and payment request (if needed) for expenditures from project start date through September 30.
March 15	Project report and payment request (if needed) for October 1 through February 29.
August 31, 2010	Ending date for Agreements
September 15	All final report and payment request documents through August 31, and all photographs and products required in HPF Agreement.
September 30	Last day in the Federal Fiscal Year

2009 Maintenance Grant

October 15	Project report and payment request for expenditures from project start date through September 30.
April 30, 2009	Ending date for Agreements
May 15	All final report and payment request documents through April 30, and all photographs and products required in HPF Agreement.

Don't forget that all subcontractor selections must be approved by SHPO prior to contracting, and remember to submit all document or video drafts to SHPO for review, revision if necessary, and approval prior to publication. Review by professional staff may take two weeks.

5. Final Products

Federal Guidelines make it very clear that the product is the measurable result of HPF projects. Products must meet the Secretary of Interior's Standards for the applicable project objectives. It is very important that you complete each element agreed upon in the Agreement. If goals are not met, it is SHPO's responsibility to withhold final reimbursement, or request re-payment of funds. Your ability to secure future grants from SHPO may also be affected.

6. Amendments to the Agreement

No changes may be made without prior written SHPO approval that would substantively alter the scope of work stipulated in the HPF Agreement, or make any changes which might result in a deviation from the intent of the legislation which authorized the award of the grant.

Any request to amend the scope, objectives, timeline, budget, or products of the HPF Agreement must be submitted in writing to SHPO. The document must include a complete explanation of the reason for the request and how the final product will be affected, and revised versions of the affected Agreement sections. A new Timeline is required to be submitted with all revisions.

The Grants Coordinator must be notified as soon as possible of expected under expenditures of grant or match funds. Any unspent HPF funds must be re-obligated to other projects; otherwise, they are lost to the people of Oregon, returned to the federal government, and distributed to other states.

7. Extensions to the Agreement End Date

The Federal Fiscal Year ends on September 30 each year. HPF Agreements

end on August 31 to allow grantees time to submit closeout materials by the end of the Federal Fiscal Year. Any variance to this schedule must be requested in writing, and the reason for the request must be fundamental to the accomplishment of grant objectives. No HPF Agreement can be extended beyond September 30.

When the project is completed by August 31, but processes in the grantee organization will delay submission of closeout materials, a variance to the closeout submission date may be requested in writing, with the reason for the request clearly explained.

8. Final Project Report

Final Project Report documents, that also include:

The Certification of Project Completion.

9. Final Project Closeout

The HPF Agreement will be considered closed out when:

- * all required reports, payment requests, and products have been received by SHPO, approved as consistent with National Park Service and SHPO regulations and standards, and the HPF Agreement;
- * Matching contribution has been approved and grant funds have been disbursed.



**NPS FINAL PROJECT REPORT
CERTIFICATION OF PROJECT COMPLETION**

I certify professionally qualified program and grants management staff of my organization have confirmed, through visits to the project site and/or review of grant products, financial and performance reports that work under this sub-grant (or contract) has been accomplished according to applicable laws, regulations, Secretary of the Interior's Standards, other program standards, grant management requirements specified in the Historic Preservation Fund Grants Administration Manual, and the terms and conditions of the applicable HPF grant(s).

Authorized Signature:

Typed Name Title

Signature Date

III. GENERAL CONDITIONS OF THE GRANT

1. Standards Applicable to Sub-grantees.

Standards have been developed to assure that HPF grantees are qualified to operate both the programmatic activities of the grant and the fiscal/administrative management. The award of HPF monies to those who are not responsible and/or qualified would be a disservice to the public, which is entitled to receive full benefit from the award of grants for the protection of cultural resources. It would also be inequitable to the unqualified contract holders themselves, who may suffer financial or other hardships as a result of an inability to meet grant requirements. Such awards would be unfair to other individuals or organizations capable of performance, and may discourage them from applying for future grants.

SHPO has taken essential precautions to award grants only to reliable and capable applicants who can reasonably be expected to comply with grant requirements. For a potential HPF recipient to be found qualified and responsible, the State Historic Preservation Officer must ensure that the recipient will be provided with, or will have access to, appropriate technical and financial management assistance in order to meet and maintain, for the period of the grant award, the following standards as they relate to the scope of a particular project:

- a. Have adequate financial resources for performance, the necessary experience, organization, technical qualifications, and facilities; or a firm commitment, arrangement, or ability to obtain such (including proposed sub-agreements);
- b. Be able to comply with the proposed or required completion schedule for the project;
- c. Have a satisfactory record of integrity, judgment, and performance, especially prior performance upon grants and contracts;
- d. Have an adequate accounting system and auditing procedures to provide effective accountability and control of property, funds, and assets sufficient to meet grantee needs and grantee audit requirements;
- e. Abide by Federal Procurement Standards, and are capable of managing the consultant or contractor;
- f. Maintain a property management system for the acquisition, maintenance, safeguarding, and disposition of property;
- g. Conform with the civil rights, equal employment opportunity and labor law requirements of Federal grants; and

- h. Be otherwise qualified and eligible to receive a grant award under applicable laws and regulations.

If you feel you need technical assistance in any of these areas, you must contact the SHPO as soon as possible in your grant cycle.

2. Allowable Costs.

Expenditures may be charged to this grant only if they:

- a. are in payment of an obligation incurred during the contracted grant period,
- b. are necessary to the accomplishment of approved grant objectives, and
- c. conform to the Federal "Standards for Allowability of Costs".

3. Audits. A financial audit of your grant may be conducted following the submission of your final products and payment requests after the grant period ends. Also, the SHPO program is audited at least every four years, and your project may also be audited as a part of that review. Your financial records should be retained for a period of seven years, or for three years following the final audit.

4. Civil Rights. NPS grant-assisted programs and projects must be administered in conformance with the Civil Rights Act of 1964 (Public Law 88-352), as amended; 43 CFR 17, issued by the Department of the Interior; and Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against the handicapped. Title VI of the Civil Rights Act of 1964 states that no person will, on the grounds of race, color, age, national origin, sex, or handicap be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. Every contract holder is required to complete an Assurance of Compliance (Form DI-1350).

5. Use of Federal Employees. You may not use any Federal funds or funds from other sources applied as a matching share to pay a fee to, or travel expenses of, current employees of the Federal government for consultant services, lectures, attending program functions, including temporary summer employees of Historic American Buildings Survey/ Historic American Engineering Record (HABS/HAER) and Community Development Block Grant (CDBG) through the Department of Housing and Urban Development (HUD) participation. This prohibition is in accordance with 18 USC 209 which stipulates that Federal employees whose employment has not terminated shall not receive supplemental compensation for their services in their capacity as Federal government employees.



IV. SPECIAL REQUIREMENTS OF THE GRANT

1. Federal Administrative Requirements. The provisions of Office of Management and Budget Circulars A-87, A-102, and A-110 referred to in your contract, apply to HPF grants. Failure to comply with these Circulars may be the basis for withholding payments for proper charges, recovery of such funds, and the termination of financial support. Most of the circulars are on the Web, at <http://www.whitehouse.gov/OMB/circulars/>.
2. Environmental Requirements. Activities funded by HPF grants shall be conducted in full accord with the policies and provisions of the National Environmental Policy Act of 1969 (Public Law 91-190), the Coastal Zone Management Act, and the Floodplain Management Act, as applicable.
3. Equal Opportunity. Equal Opportunity posters will be distributed to all projects by the SHPO. These must be posted in all project offices and sites. All activities assisted under the HPF grant program are subject applicable Federal laws as stated in your contractual agreement, including the provisions below:
 - a. Title VI of the Civil Rights Act of 1964, 78 Stat. 241, as amended, which provides that no person on the grounds of race, color, age, national origin, or handicap shall be excluded from participation in, be denied the benefits of, or be subject to discrimination under any activity receiving Federal financial assistance.
 - b. DI Form 1350, Assurance of Compliance (with Title VI, Civil Rights Act of 1964) is part of the contract documentation.
 - c. Property acquired or developed with HPF assistance shall be open to entry and use by all persons, regardless of race, color, age, national origin, or handicap who are otherwise eligible. Discrimination on the basis of residence, including preferential reservation or membership systems, is prohibited, except to the extent that reasonable differences in admission or other fees may be maintained on the basis of residence.



V. ACCOUNTING PROCEDURES

In any program where reimbursement is requested for a portion of project costs, or matching share is claimed, adequate records are essential. There should be definite supporting evidence for EACH item of cost claimed--estimates are not sufficient.

In order to promote a better understanding of the records required and to avoid the possibility of having costs disallowed at the time of audit, the following accounting procedures are suggested for all SHPO grants:

A separate account should be established for each agreement project. The ledger sheet, computer cards or tape should include the project HPF number and name. It should be maintained in such a manner (e.g., separate columns on a ledger sheet) that payment for salaries and wages, contracts, equipment rental, supplies and other items conform to categories listed on the Grant Agreement and Report Form.

Each entry in the account must be cross-referenced to a voucher, payroll invoice or other supporting document. Each payment request must be supported by a cancelled check or warrant.

1. Salaries and Wages

In cases where grantee staff are acting as professional historic preservationists carrying out the project, they will have to meet the Secretary of Interior's Historic Preservation Professional Qualification Standards and be pre-approved by SHPO.

a. Payrolls should be signed by an authorized official and wages paid should be supported by time and attendance records for each employee. Time and Attendance Records (daily, weekly, or monthly) must show total daily hours for all projects and description of work performed. A system which reports only hours applicable to the SHPO grant is not acceptable. Examples of timesheets are available from SHPO.

b. Fringe benefit rates should be developed using actual costs, and individual components should be identified. Documentation should show how rate or cost was derived. This amount must be traceable through the sub-grantee's records.

c. After receiving written SHPO approval of consultant/contractor selection, provide SHPO with a copy of the sub-contract. The work

performed by consultant or contractor must be consistent with the provision of the HPF Agreement.

d. Payments made by the sub-grantee should be supported by a statement or invoice from the contractor. The document must identify the project and the service performed. It must also indicate the time period in which the service was performed. (Remember that contracts must be advertised according to Federal Procurement Standards, selection pre-approved by SHPO.)

e. No fee or wage paid as an hourly rate with grant or matching funds to staff, contractor, or consultant may exceed the GS-15 federal employee salary range.

2. Consultant Services

Proper consultant selection procedures must be followed and proper documentation maintained for audit. Federal Procurement Standards must be followed, or contract costs are subject to disallowal. Remember, the contractor or consultant managing and oversight for the duration of the project is the grantee's responsibility.

a. Payments made by the sub-grantee should be supported by a statement or invoice from the consultant. The consultant hours do not need to be broken down if contracted in a lump sum, since the consultant agreement should state a total contracted amount.

b. Payments made include fee for service, salary, per diem, payment for the travel, or other allowable services.

c. A cost-plus-percentage of costs payment is not allowable under federal regulations.



3. Travel

a. State guidelines require that all mileage rates do not exceed the current maximum federal rate per mile.

b. A copy of reimbursement request must show name of individual, mileage (odometer readings or locations) and purpose.

c. A copy of lodging receipts for overnight travel must be maintained.

d. Reimbursement requests must show name of individual; time of departure and return; dates; and meals claimed.

4. Equipment Rental (Owned)

Equipment rental cost (for owned equipment) should be supported by time records and by a schedule of hourly rates developed from actual historical costs, or in the event no previous cost data exists, from reasonable estimates of such factors as useful life, annual hours or use, insurance premiums, etc. These estimated rates must be adjusted each year based on the previous year's actual costs. The State has developed a tabulation type form that may be used for this purpose; copies are available from SHPO.

5. Equipment Rental (Outside)

Payments made by the project sponsor for equipment rented for specific project area are generally allowable under federal regulations. Payments made by the project sponsor must be supported by a statement or invoice from the vendor that indicates the time period the equipment was rented.



6. Materials and Supplies

Supplies and materials charged to the project must be supported by purchase orders and supplier's invoices if purchased for a specific project, or by approved requisitions or similar documents if issued from stock; unit prices for stock issues should be traceable to actual invoices and/or other historic cost data. A photocopy of the cancelled checks must be provided in final payment request or be available for field audit.

7. Motor Pool (Equipment)

The payment request form must relay the following:

- a. Equipment number
- b. Mileage or hour
- c. Rate charged

8. Indirect Costs

Indirect costs are those incurred for a common or joint purpose benefiting more than one cost objective and not attributable to one particular project. These types of costs are allowable if approved by a cognizant federal agency (primary source of federal funds). They must be pre-approved by SHPO. Approval is obtained by submitting a Cost Allocation Plan. Many larger governmental agencies already maintain a Cost Allocation Plan and may use the existing plan. Smaller governmental agencies and non-profits may find that the process is not cost effective for the total dollar amount attributed to indirect costs. If interested, procedures are found in OASC-10, which is made available upon request from SHPO.

In some cases, indirect cost rates may exceed the amount SHPO is able to pay, and still maintain an equitable distribution to grantees. In this case, the rate to be paid under the HPF Agreement will be negotiated.

9. Non-Allowable Costs

Become familiar with Standards For Allowability of Costs.

10. Valuation of In-Kind Contributions from Non-Federal Third Parties

The value of labor, materials, equipment usage, etc., donated by sources outside the agency may be included only if fully documented in the project application and approved in advance by the State Historic Preservation Office. The sub-grantee should use the forms provided for this purpose by the SHPO, refer to Appendix E. The unit value of all donations must be approved by the SHPO as part of the proposed budget prior to the acceptance of the donation by the project sponsor.

- a. Valuation of volunteer services -- Volunteer services may be furnished by professional and technical personnel, consultants, and other skilled and unskilled labor. Volunteered services may be counted as matching share if they are an integral and necessary part of an approved program. However, because this benefit has been abused occasionally in the past, donated values are reviewed with particular care by state and federal auditors, and complete and meticulous records are absolutely essential, if these values are used for matching share.



b. Required Documentation for Volunteer Services -- All volunteer services claimed as nonfederal share must be substantiated by time cards or records that are signed by both the volunteer and their supervisor, as required for all other employees. Such records must show the actual hours worked and the specific duties performed. The records should also indicate the basis for determining the rate of the volunteer's contributions, and such documentation must be available for audit. Volunteer time records must be signed by both the volunteer and supervisor to be an allowable contribution.

A packet of forms is provided in Appendix E for use by proponents who anticipate donated values to projects. The forms are, for the most part, self-explanatory. The Donated Labor forms are weekly time sheets that must be signed by both the person donating the time and a supervisor. Proponents should keep copies of the completed forms, and additional blank forms may be reproduced locally as necessary. The cost of reproduction may be included in the reimbursable project cost. The State Historic Preservation Office will not process requests for reimbursement containing donated values unless donated value documentation is complete.

c. Rates for volunteer services

Rates for volunteer services may not exceed those regular rates paid for similar work in other activities of the state government, not to exceed the GS-18 federal employee salary range (currently \$65.68 per hour). In those instances in which the skills required for the Historic Preservation Fund-assisted work are not found in the state government, rates used must be consistent with those paid for similar work in the labor market in which the grantee competes for the kind of services involved. For example, if a carpenter or bookkeeper donates carpentry or bookkeeping services to the project, these services may be valued at the hourly rate the carpenter or bookkeeper would normally charge. In such cases the donor must sign a brief statement that notes the donor's usual occupation, social security number, intent to donate usual occupational services, and the date. These statements are then included in the payment request support documentation.

If a volunteer performs services outside his profession or trade, this volunteer time must be valued at the current minimum wage rate. All such rates are subject to National Park Service and SHPO field and audit review.

d. Volunteers employed by other organizations -- When an employer other than the grantee or a university furnishes the services of an employee, these services will be valued at the employee's regular rate of pay (exclusive of fringe benefits and overhead cost) provided these services are in the same

profession for which the employee is normally paid.

e. Donated Professional Services -- When professional services, such as architectural services, are donated to a project, the professional simply marks an invoice for professional services "donated" and signs it. Again, the maximum hourly charge rate applies to the total of both grant and match-funded hourly pay. For example, a professional who normally charges \$100 may donate time in the amount of \$74.92/hour. If the time is charged to the grant in the amount of \$30.00, the professional may donate the balance of \$44.92 as match. The difference between \$100 and \$74.92 cannot be charged to either grant or match.

f. Donated Materials -- Invoices, where applicable, must be marked "donated" and attached to Donated Material Summary sheets and signed.

g. Donated Equipment -- Invoices, where applicable, must be marked "donated" and attached to Donated Equipment Summary sheets and signed.

11. Exclusions in Volunteer Labor Match

a. Volunteer work performed by full-time grantee staff members within the scope of the normal responsibilities of the position in excess of their working hours is not allowable as matching share.

b. Part-time grantee staff may not donate more than 40 hours a week, less their paid employment. Such donations of services must be necessary and directly related to project work and be appropriately valued and documented. Project staff may not donate hours in excess of a 40-hour work week.

c. Consultants may donate services only if the employment contract specifies that the consultant is accepting less than his/her normal rate of pay and is explicitly donating the difference for the achievement of project work. Such donations must be documented. A written statement of intention to donate the rate difference should be on file and available for audit.

VI. IN-FIELD MONITORING

Expect to receive approximately one or more site inspections involving both the project coordinator and/or persons conducting the work. Typically, the meeting might consist of a visit to the project area; a review of the boundaries, concentrations or types of resources, discussion of the progress of the project, or attendance at a public hearing or meeting. Record keeping and financial systems will be examined. In-field monitoring will be scheduled in advance of the meeting.