



African American Civil Rights Historic Preservation Fund Grants

Dial-in #: 1-866-881-8098

Passcode: 5049910#

PLEASE PLACE YOUR PHONE ON MUTE

Managing Your Grant

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Presentation Summary

- Welcome
- Attendance
- Introductions
- Word Soup
- Grant Agreement
- Historic Preservation Fund (HPF) Requirements
- Project specific guidance
- Grant Reporting
- 2 CFR 200
- Procurement/Allowable costs/Matching Share
- Insurance/Fiscal Responsibility/ Audit/ Records
- Best Practices
- Reimbursement and Fiduciary Controls
- Section 106 & NEPA
- References

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Historic Preservation Fund

- Established in the 1976 amendments to the National Historic Preservation Act (the Act), the Historic Preservation Fund (HPF) is the source of preservation grants and financial assistance to states, Tribes, local governments, and non-profits. The Act allows states and Tribes to participate in the National Historic Preservation Program by appointing a State or Tribal Historic Preservation Officer (SHPO/THPO) to perform, or have performed, survey, document, and record historic properties and guide preservation activities at the State and Tribal levels. The HPF provides the money necessary for states and Tribes to implement these activities. The funds are administered by the National Park Service (NPS).
- Public Law 114-113 established the African American Civil Rights grant program and authorized \$ 8million from the HPF for the program in FY 2016.
- Funding for the HPF comes from offshore oil and gas lease revenues. The extraction of one non-renewable resource is somewhat counter-balanced by the benefits of preserving other irreplaceable resources.

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Acronyms in your Grant Agreement

- **ACHP** – Advisory Council on Historic Preservation – oversees the Section 106 process
- **AO** – (NPS) Awarding Officer
- **ASAP** – Automated Standard Application for Payment , the Federal grant payment system
- **ATR** – (NPS) Agreements Technical Representative – NPS Grant Manager
- **CLG** – Certified Local Government – Official local community historic preservation board
- **DOI** – Department of Interior (NPS is an agency under DOI)
- **FA** – Financial Assistance (grant agreement)
- **FFR** – Federal Financial Report otherwise known as SF-425
- **HPF** – Historic Preservation Fund – fund from which AACRs are awarded
- **NEPA** – National Environmental Policy Act – Review of environmental impacts of federal projects
- **NHPA** – National Historic Preservation Act (NHPA is now found under 54 USC 301 et. seq.)
- **NPS** – National Park Service
- **SAM** – System for Award Management (Federal System for Registering to be eligible to receive federal funds and for Federal agencies to check on eligibility of entities to receive funds.)
- **Section 106** – Review of impact of federal projects on historically and culturally significant properties.
- **SHPO** – State Historic Preservation Office
- **THPO** – Tribal Historic Preservation Office

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Your Grant Agreement & Requirements

- Requirements – Most requirements are listed in the grant agreement.
 - Goes into effect when both parties sign
- **Website** You can find most of the information on the website on how to manage your grants.
<https://www.nps.gov/preservation-grants/civil-rights/reporting.html>

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Your Grant Agreement

Articles to focus on:

- Statement of Work (III)
- Term of Agreement (IV)
 - Extensions are possible
- Key Officials (V)
 - ATR and AO
- Budget (VI)
 - Federal/Match/Categories
- Reports and Deliverables (IX)
- Subgrant information
- Indirect Costs (XIV)
- Competitive Selection (XVIII)
- Review and Compliance (XIX – XX)

Special Conditions/Articles based on your Risk Assessment and project

- Extra reporting
- Backup documentation
- Accounting information
- Submission to the SHPO

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Budget & Statement of Work

- Budget (VI) and statement of work (III) are in your grant agreement
 - Changes can be made to both.
- Budget – contact NPS if more than 15% change and include explanation
- Scope change – contact NPS with explanation and proposed change and timeline.
 - Both of these items can happen in your interim report

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Deliverables

- The grant agreement lists the project deliverables.
- Due with the Final Report.
- Drafts due prior to Final Report to allow for SHPO or stakeholder input and NPS comment.

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Extensions

- Grant period is 2/3 years.
- Extensions are allowed under certain circumstances.
- Request in Interim Report or contact NPS prior to the current end date.

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Publications

- All drafts must be approved by NPS
- Disclaimer/Acknowledgment
 - ***"Partially funded by the African American Civil Rights program of the Historic Preservation Fund, National Park Service, Department of the Interior. Any opinions, findings, and conclusions or recommendations expressed in this material do not necessarily reflect the views of the Department of the Interior."***
- NPS right to republish/photos
 - Provide citations and photographer
- All consultants must be informed of this requirement.
- Use of NPS logo is allowed with prior permission requested

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Public Events/Endorsement

- Press releases should be sent to your grant manager for prior approval.
- Press Releases must state:

"Partially funded by the African American Civil Rights program of the Historic Preservation Fund, National Park Service, Department of the Interior. Any opinions, findings, and conclusions or recommendations expressed in this material do not necessarily reflect the views of the Department of the Interior."

Also – add the non-endorsement statement to any press release. (see grant agreement)

- A press release should be posted in your local newspaper within 30 days of receiving the signed grant agreement. Submit a copy to NPS with first interim report.
- Transmit notice of any public ceremonies so NPS may support you.
- Don't publish anything that implies NPS endorsement of your organization.

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GETTING YOUR PROJECT STARTED

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Consultants/Contractors

NPS concurrence with selection:

- Required for all contractors/consultants assisting with grant development/history projects
- If funded by grant funds, submit summary of competitive process and copy of qualifications
- If not funded by grant funding, submit copy of qualifications

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Project Specific Guidance

History projects: Survey and Inventory

- *Secretary of the Interior's Standards and Guidelines for Archeology & Historic Preservation*
- All surveys must be conducted, supervised, reviewed, or verified by a person(s) from the appropriate discipline who meets the [Secretary of Interior's Professional Qualification Standards](#). For example, a historian is needed for a survey project.

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Project Specific Guidance

History Project: Oral Histories

- The [Oral History Association](#) (OHA) sets professional standards for oral history practitioners in the United States. Its website has a wealth of information about conducting oral history projects. The OHA's [General Principles of Oral History and Best Practices for Oral History](#) (2009) is a description of oral history methods and what to do before, during, and after an interview.
- Work must be conducted, supervised, reviewed, or verified by a person who meets the [Secretary of Interior's Professional Qualification Standards](#)
- All projects should have an identified audience, a clear plan for outreach and dissemination, and be related to an overall plan for how the research and documentation will be used either as part of this project or in the future.

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Project Specific Guidance

Preservation Projects: Predevelopment and Construction/Development

- [Secretary of Interior's Standards for the Treatments of Historic Properties](#)
- If the project involves earth moving or demolition you must also use [Secretary of Interior's Archeological Documentation Standards](#).
- All Plans & Specs and repair work must meet **Secretary of the Interior's Standards and Guidelines for Archeology & Historic Preservation** and be submitted to NPS for review and approval prior to commencement of work.
- Project Sign
- Profits made from salvage must be reported as program income and deducted from the grant funding.

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Construction Continued

- Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consider the effects of federal impact on historic properties. Section 106 requires that NPS, as the federal agency responsible for the funding, review all proposed work to ensure that it will have “no adverse effect” on the historic property.
- Similarly, NEPA requires that federal agencies review all federally-funded work for potential environmental adverse effects.
- MORE LATER.....

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Construction Continued

Easements / Preservation Covenants

- Protect the grant assisted work
- Best to start this early
- Draft required in the first year so that any issues can be worked out before it is “required”
- Model Easement available on our website
- Grants over \$75,000 require 20 year duration for the easement
- SHPO usual holder, but other preservation groups can with NPS approval
- Easements are registered with the deed at the County

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GRANT REPORTING

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Grant Reporting

Interim Report

- a) Cover sheet
- b) Detailed narrative
- c) Photographs
- d) Any drafts due
- e) SF-425
- f) ASAP print out

Dates for reporting

- listed in the grant agreement – 30 days after period end date
- Due Sept 30 – covers 3/1/17 to 8/31/17, then every six months

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**Include:**

- Progress on project
- Any problems
- Requests for equipment
- Any changes to the grant agreement – budget, scope, etc.
- Extension requests
- Copies of any draft deliverables
- SF425
- Drawdown history from ASAP
- SF-428A
- What has been accomplished
- What still needs to be completed
- Photos!

If your project involves construction:

- Copy of your draft project sign
- Photo of installed project sign
- Copy of draft easement
- Copy of fully executed easement
- Plan/specs for Section 106 review
- Completed NEPA worksheet

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Stats to track

- Be sure you are keeping track of things that will be reported on the **FINAL REPORT**:
- Number of hours of employment funded with this project.
- Number of people accessing information/site in the next year and 5 years projected.
- Key partners and participants that participated in the grant project and briefly describe their contribution to the project
- contribute to a larger community/tribal/city/regional/state tourism or economic revitalization
- plans for ongoing funding, expansion, modification, or replication
- future public outreach activities are planned to increase the public's access
- major obstacles you faced in implementing your grant project and what additional assistance (from partner organizations, the community, NPS, etc.) would have benefited your organization

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SF425 Federal Financial Report

- Must submit with Interim/Final Report
 - If charging indirect costs must be on SF425
- List correct reporting dates from the grant agreement.
- More guidance on our website

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SF425 – Instructions (Fields 1 - 9)

Enter the Tribe's name and address.

Enter National Park Service

Enter the Grant Agreement # assigned by the Federal Agency

Enter the number of pages included in the report – usually one.

FEDERAL FINANCIAL REPORT
(Follow form instructions)

1. Federal Agency and Organizational Element Which Report is Submitted National Park Service		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment) P16AP000999		Page 1	of 1
3. Recipient Organization (Name and complete address including Zip code) Recipient Organization A, 123 Main Street, Anytown, XX 12345					
4a. DUNS Number 123456789	4b. EIN 12-3456789	5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment)		6. Report Type <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-Annual <input checked="" type="checkbox"/> Annual <input type="checkbox"/> Final	
8. Project/Grant Period From: (Month, Day, Year) 09/01/2016		To: (Month, Day, Year) 08/31/2018		7. Basis of Accounting <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Accrual	
9. Reporting Period End Date (Month, Day, Year) 03/31/2017		6. Reporting Period End Date (Month, Day, Year) 03/31/2017			

This is the start date of grant agreement.

This field is optional and for the recipient's use only.

This is the end date of the grant agreement.

Indicate the report type.

The reporting period end date as listed in your grant agreement for Interim reports.

Indicate the recipient's basis of accounting.

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SF425 – Instructions (Fields 10a - 10h)

Field d - Total grant award amount.

For cash basis, the sum of cash disbursements under the grant. **(Amount Spent)**

For accrual basis, the sum of cash disbursements and the sum of expenditures incurred and recorded but not yet paid related to the grant.

(Use lines d-o for single grant reporting)

Federal Expenditures and Unobligated Balance	
d. Total Federal funds authorized	40,000.00
e. Federal share of expenditures	5,000.00
f. Federal share of unliquidated obligations	0
g. Total Federal share (sum of lines e and f)	5,000.00
h. Unobligated balance of Federal funds (line d minus g)	35,000.00

For cash basis, the sum of expenditures incurred but not yet paid out.

For accrual basis, the sum of expenditures incurred but for which an entry has not yet been made.

The sum of lines 10e and 10f. This amount represents the **total spent on grant so far**

Balance. Funds not yet spent from grant total

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Final Report

General Requirements

- Final Report Cover
 - Answer all questions
 - Final Budget
 - Complete narrative
 - Deliverables
 - Must have met objectives in the Scope of Work
- SF-425
 - No balances!
- ASAP printout
- Easement (if applicable)

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FEDERAL REQUIREMENTS

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Federal Requirements 2 CFR 200

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

- Procurement Standards
- Allowable/eligible/reasonable costs
- Matching share
- Insurance and Liability requirements
- Audit requirements

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Procurement

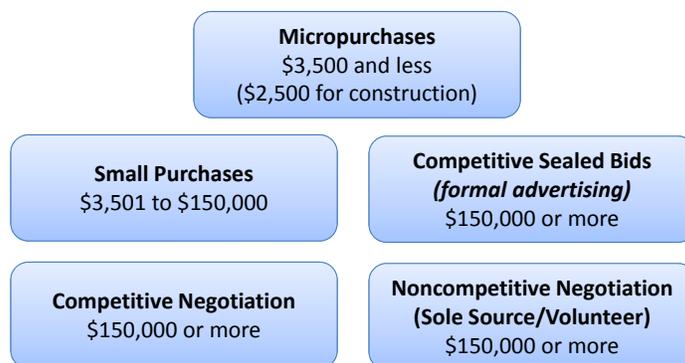
- Contractors and consultants must be competitively acquired – [2 CFR 200.320, Methods of Procurement](#).
- States follow own Procurement procedures (2 CFR 200.317)
- Single source bidding has a very high standard will likely not be approved.
- **All contractors and consultants must be approved by NPS and must meet qualification standards as listed in your grant agreement.**
- Maximum hourly wages charged to this grant for personnel and consultants may not exceed 120% of the salary of a Federal Civil Service GS-15, Step 10. <https://www.opm.gov>

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Procurement

- Methods of Procurement ([2 CFR 200.320](#))



Documentation that price is "fair and reasonable" is required for all purchases.

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Procurement

- Types of Contracts ([2 CFR 200.320](#))

Allowable	Unallowable
<div style="border: 1px solid black; border-radius: 10px; background-color: #e6f2ff; padding: 5px; margin-bottom: 5px; width: 80%; margin: auto;">Firm Fixed-Price Contracts</div> <div style="border: 1px solid black; border-radius: 10px; background-color: #e6f2ff; padding: 5px; margin-bottom: 5px; width: 80%; margin: auto;">Fixed-Price Incentive Contracts</div> <div style="border: 1px solid black; border-radius: 10px; background-color: #e6f2ff; padding: 5px; width: 80%; margin: auto;">Cost-Reimbursement Contracts</div>	<div style="border: 1px solid black; border-radius: 10px; background-color: #e6f2ff; padding: 5px; margin-bottom: 5px; width: 80%; margin: auto; opacity: 0.5;">Cost-Plus-a Percentage-of-Cost*</div> <div style="border: 1px solid black; border-radius: 10px; background-color: #e6f2ff; padding: 5px; width: 80%; margin: auto; opacity: 0.5;">Percentage-of-Construction-Cost *</div>
	<p><small>*These contracts and any goods or services acquired under them are not allowable for federal share or non-federal matching share expenses.</small></p>

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Allowable Costs

- Resources
 - Grants Manual* Chapter 13
 - 2 CFR 200, Subpart E - Cost Principles
 - If conflicting, contact your Grant Manager
- Development costs
- Necessary Audits
- Equipment* (limited circumstances)
- Landscaping (limited circumstances)

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Indirect & Administrative Costs

- **Indirect Costs** - Costs incurred for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the HPF grant without effort disproportionate to the results achieved (2 CFR 200.414).
- Indirect costs and administrative costs added together **may not total more than 25%** of budget.
- Indirect cost rate must be on file or memo if claiming 10% de minimus rate

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Common Unallowable Costs

- Curation of artifacts after the grant end date
- Entertainment and Alcohol, most food
- Honoraria
- Lobbying/fundraising
- Indirect Costs if no current IDC in place
- Travel expenses beyond Federal per diem rates
- Equipment purchased without prior NPS approval

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Matching Share

- Not required by the program but.....
- If part of the project must meet all the same rules as the federal share
- Must be reported on SF425
- Keep costs organized
- Track in-kind with timesheets and documentation of value

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Insurance and Liability

- **You must be insured:** It is required to obtain and maintain liability insurance throughout the life of the grant and list the federal government as an additional insured under your policy. (Some exceptions – i.e. local governments)
- Costs of insurance required by this grant are allowable.
- Unallowable costs of insurance include insurance held to correct defects in materials or workmanship.
- **You indemnify NPS:** By signing your grant agreement, your entity indemnifies the federal government against third party claims for damages.

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Insurance and Liability

- **Bonding Requirements** (2 CFR 200.325)
- For construction contracts/subcontracts **exceeding \$150,000**, NPS may accept your entity's bonding policy and requirements as long as we determine the Federal interest is "adequately protected."
- If not, the minimum requirements must be: **(a)** A bid guarantee from each bidder equivalent to five percent of the bid price; **(b)** A performance bond on the part of the contractor for 100 percent of the contract price; and **(c)** A payment bond on the part of the contractor for 100 percent of the contract price.

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Audit Requirement

- **Single Audit Act compliance**
 - Nonfederal Entities are subject to Single Audit Act requirements if they expend more than \$750,000 in their fiscal year. This is not optional.
 - Annual Certification will be required to confirm you do not meet these requirements.

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GETTING YOUR FUNDS

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ASAP/ Reimbursements

- Reimbursable grant
 - As funding is expended on the project, you may drawdown that amount.
 - Full drawdown is not allowed
 - Advances are allowed under certain circumstances
- ASAP
 - Grantee must be enrolled in ASAP even if already enrolled with other agency
 - ASAP help desk: 1-855-868-0151, option #2, option #3; 7:30 am – 6:00 pm Monday – Friday; kfc.asap@fiscal.treasury.gov
 - Draw funds: <https://www.asap.gov>
 - Enrollment, instructions: <http://go.nps.gov/pay>



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ASAP/ Reimbursements

When do I draw down?

- HPF grants are *reimbursement* grants
 - This means you have to incur the costs before you can draw them down.
 - For example, you must have received and paid an invoice or purchased goods
 - Advances are allowed, provided you have written procedures to minimize the time between drawing down and expending the funds; details in 2 CFR 200
 - Must be only for the amount immediately needed

How do I draw down?

- Staff member with appropriate role(s) must log in to ASAP.gov and make drawdown using ACH or Fedwire
 - Instructions are on our website at go.nps.gov/pay
- Log in regularly to ensure your account doesn't expire
- Funds are pushed to your account the next business day for ACH payments or the same day for Fedwire payments

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ASAP/ Reimbursements (cont'd)

What do I need to know to draw down?

- Username and password with appropriate privileges
- Have your ASAP ID (also called Recipient ID) handy; each organization receives a unique 7 digit number
- Have your ASAP account ID handy

How do I tell my grant manager that I have made a drawdown?

- High-risk grantees must receive prior permission to draw down and/or provide additional documentation
- Other recipients may make drawdowns at any time without notification/approval
- Interim and final reports must include a printout of drawdowns; instructions for this are on our website under go.nps.gov/pay

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ASAP/ Reimbursements (cont'd)

What happens if a make a mistake?

- If you draw down too much, and you discover the error within 30 days of the draw, you can return the funds via ASAP
- After 30 days, you must write a check payable to the National Park Service, referencing your grant number. You should contact your grant manager for details.

Who can answer questions about using ASAP?

- General information about enrollment, user roles, and how to draw down is available at go.nps.gov/pay

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Additional Fiduciary Controls

- Separation of Duties
- Separate project bank account
- Disaster
- Employee changes

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BEST PRACTICES

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Best Practices

Keep in mind...

- Your grant file should tell your 'story' – without having to explain anything.
- Our job as grant managers is to make sure grantees manage their grant properly and are in compliance with all requirements.
- A well managed grant is the best form of advocacy for this grant program.

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Best Practices

What should be in my grant files?

- Grant agreement and any amendments
- Guidance & communication from NPS
- Financial documentation (receipts, invoices, timesheets, etc.)
- Evaluation criteria for consultants and related documents (Review notes, bid documents)
- Reports: interim and final

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Best Practices

What should be in my grant files? (cont.)

- Organizational chart explaining roles of who was involved in managing the grant
- Any explanatory materials given to public
- Any relevant timelines and actions plans
- Cancelled contracts and related explanations
- Records Retention: 3 years from close of grant

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REVIEW AND COMPLIANCE

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Later is Now

- Section 106 reviews
- NEPA and other law reviews
- Responsibility of the Federal agency (NPS) but requires some help from you, the grantee.

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Section 106 Steps

- Determine which properties in the project area may or will be affected by the project
- Determine if those properties are either listed, or are eligible for listing, in the National Register of Historic Places (these are referred to as “historic properties”);
- Determine how the historic properties might be affected;
- Explore measures that can be taken to avoid “adverse effects” to historic properties (see PA regarding appropriate use)
- Reach an agreement with the SHPO/THPO (and the ACHP in some cases) on such measures to resolve any adverse effects or, failing that, obtain advisory comments from the ACHP.

**Don't forget Public Consultation

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National Environmental Policy Act

- Passed by Congress in 1969 established this country's environmental policies, including the goal of achieving productive harmony between human beings and the physical environment for present and future generations.
- NEPA is triggered by a federal action. Federal actions are defined as projects, activities, or programs funded in whole or in part under the direct or indirect jurisdiction of a federal agency, **including those carried out by or on behalf of a federal agency**; those carried out with federal financial assistance; those requiring a federal permit, license, or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a federal agency.

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Other Federal Laws

1. Endangered Species Act
2. Executive Orders 11988 and 11990, Floodplain Management and Wetland Protection
3. National Historic Preservation Act (NHPA) section 106
4. Executive Order 12898, Environmental Justice in Minority and Low-Income Populations
5. Secretarial Order 3175 and ECM95-2—proposed actions on Indian Trust Resources in any environmental document

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Environmental Screening Form (ESF)

- Combines NEPA and Section 106 Documentation
- Project Information, Project Description, Section 106 information, Effects to Consider, Mandatory Criteria (Do Not Pass Go Section), Project types—development is not the only type of work that NEPA involves.
- Just the scope of your work—you are not assessing the world.

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References

- [Secretary of the Interior's Standards for the Treatment of Historic Properties](#)
- [Secretary of the Interior's Archeological Documentation Standards](#)
- [NPS Technical Preservation Briefs](#) – recommended methods and approaches for rehabilitating historic buildings.
- [Citizen's Guide to Section 106 review](#)
- [NEPA review process](#)
- Contact your [State Historic Preservation Office](#)
- [2 CFR 200](#), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- [Historic Preservation Fund \(HPF\) Manual](#)
- STLPG [webpage](#)

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State, Tribal, and Local Plans & Grants Division

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Questions?

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