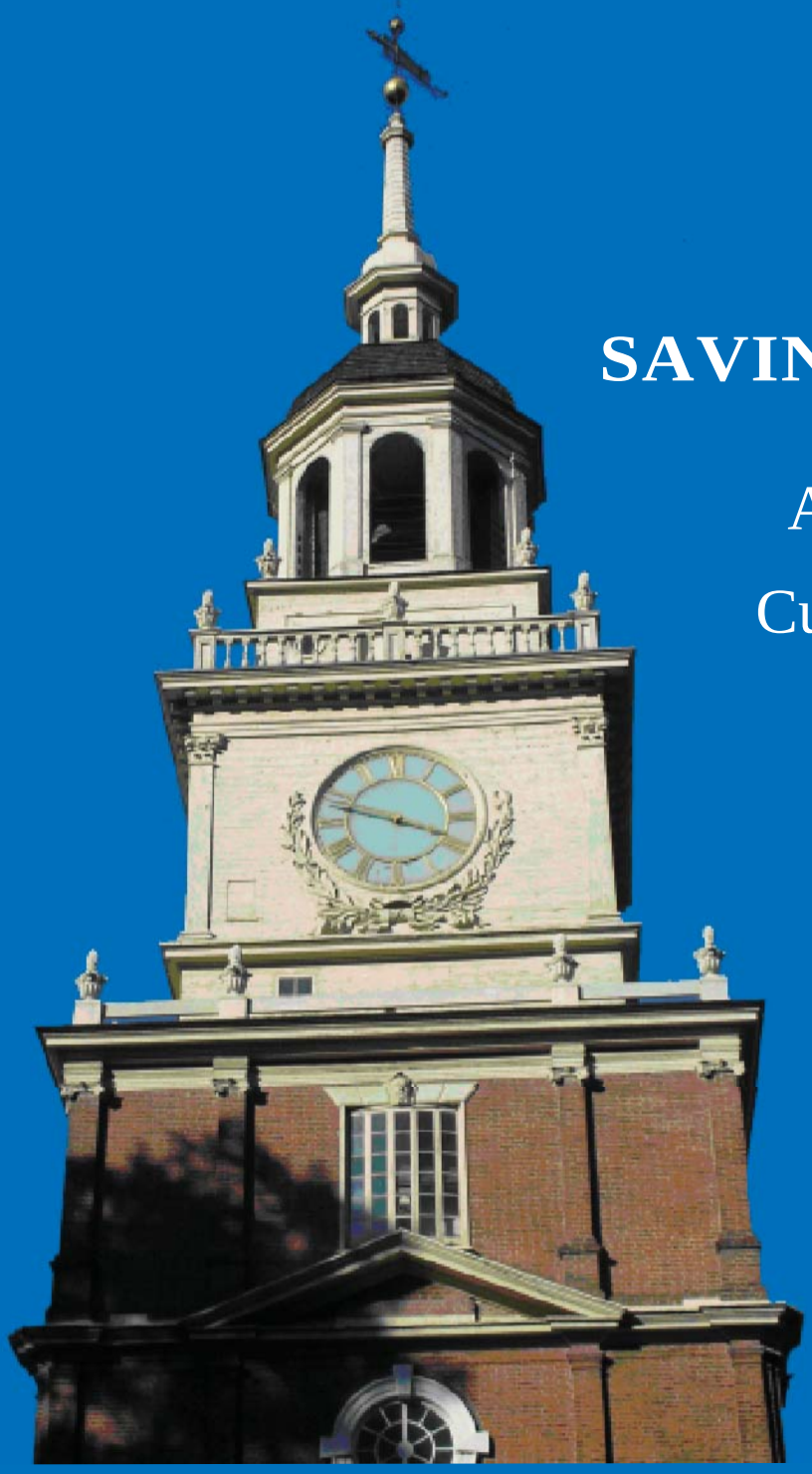
A Report by a Panel of the

NATIONAL ACADEMY OF PUBLIC ADMINISTRATION

For the National Park Service



SAVING OUR HISTORY:

A Review of National Park Cultural Resource Programs

2008

NATIONAL ACADEMY OF PUBLIC ADMINISTRATION®

Note regarding front cover:
The photograph on the cover is the tower at Independence Hall, Philadelphia, Pennsylvania. See page 34 of this report for an explanation of the maintenance problems that place this important national cultural resource at risk.

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NATIONAL ACADEMY OF PUBLIC ADMINISTRATION

For the U.S. Department of the Interior, National Park Service

October 2008

SAVING OUR HISTORY: A Review of National Park Cultural Resource Programs

PANEL

Frank Hodsoll,* *Chair*
James Kunde*
Denis P. Galvin

** Academy Fellow*

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Jennifer L. Dorn, *President and Chief Executive Officer*
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Franklin S. Reeder, *Treasurer*

Project Staff

J. William Gadsby,* *Vice President for Academy Studies*
Lena E. Trudeau, *Program Area Director*
Don Ryan, *Project Director*
Mark D. Hertko, *Senior Analyst*
Martha S. Ditmeyer, *Senior Administrative Specialist*

The views expressed in this report are those of the Panel. They do not necessarily reflect the views of the Academy as an institution.

National Academy of Public Administration
900 7th Street, N.W.
Suite 600
Washington, D.C. 20001
www.NAPAwash.org

First published October 2008

Printed in the United States of America ISBN 1-57744-170-2

Academy Project Number: 2122

* *Academy Fellow*

FOREWORD

Although most people associate America's national parks with natural wonders like Old Faithful, two-thirds of our parks were created to protect historical and cultural resources. America's 391 national parks contain a wealth of resources that offer connections to our past and insights into our national character: historic structures; archeological sites; significant landscapes; objects, artifacts, specimens and archives; and places of special meaning. Preserving and protecting park cultural resources is one of the important responsibilities of the National Park Service (NPS).

The National Academy appreciates this opportunity to conduct an independent review of park cultural resource programs for the National Park Service. The Study Panel overseeing this effort was impressed by the dedication of NPS staff to the resources in their care and commends NPS for its efforts to set strategic goals, measure performance, and factor performance and efficiency into budget allocations and management decisions at all levels.

At the same time, the Panel is concerned that cultural resources throughout the National Park System are at risk. The Panel has identified ways that NPS can improve its stewardship of these significant national resources by strengthening performance-based management, ensuring park superintendent accountability, increasing flexibility in the use of funds, strengthening national leadership, and seeking additional staff and funding to reduce risks to cultural resources of national significance.

We extend our appreciation to the members of the Panel for their excellent work, to the project Working Group for their insights and advice, and to the project team for their research and other contributions. We also thank the external experts and NPS staff in the parks, centers, regional offices, and the Washington office who generously contributed their time, expertise and perspectives to this important effort.

Jennifer L. Dorn
President and Chief Executive Officer

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ACRONYMS

Academy	National Academy of Public Administration
ASMIS	Archeological Sites Management Information System
ANCS+	Automated National Catalog System Plus
CLI	Cultural Landscape Inventory
CRV	Current Replacement Value
DOI	U.S. Department of the Interior
FCI	Facility Condition Index
FMSS	Facility Management Software System
GPRA	Government Performance Results Act
LCS	List of Classified Structures
NAGPRA	Native American Graves Protection and Repatriation Act
NPS	National Park Service
OFS	Operations Formulation System
PART	Program Assessment Rating Tool
PEPC	Planning Environment and Public Comment
PMDS	Performance Management Data System
PMIS	Project Management Information System
SAIP	Systemwide Archeological Inventory Program
WASO	Washington Administrative Service Organization

EXECUTIVE SUMMARY

Designating special places as national parks to preserve and protect their cultural and natural resources was an American invention that helped to define who we are as a people. In 1916, Congress created the National Park Service (NPS) to care for our national parks and preserve and protect their unique resources for the enjoyment of current and future generations. Our 391 national parks contain a wealth of cultural resources: historic structures; archeological sites; significant landscapes; objects, artifacts, specimens and archives; and places of special meaning. Preserving and protecting park cultural resources is one of the foremost responsibilities of NPS.

Of the slightly more than 20,000 NPS employees, 785 were assigned to park cultural resource programs in FY2008. NPS staff in the parks, regional offices, technical centers, and the Washington office are devoted to NPS and its mission and dedicated to the cultural resources in their care. At the same time, the evidence clearly indicates that cultural resources, including resources of national significance, are at risk throughout our National Park System.

Historically, NPS has allocated funding and staff primarily based on assessments of parks' needs. Since the mid-1990s, NPS has developed various systems and tools to set strategic goals, measure performance, and factor performance and efficiency into budget allocations and management decisions at all levels. Although NPS managers now have many useful measures and tools to inform decision-making, the Panel finds room for improvement in NPS stewardship of park cultural resources.

The Panel's findings and recommendations to improve NPS stewardship of park cultural resources are organized into five cross-cutting sections and then in relation to each cultural resource program area:

Cross-Cutting Sections

- performance-based management
- park superintendent accountability
- increased flexibility
- national leadership
- funding and staffing

NPS Cultural Resource Program Areas

- archeology
- cultural landscapes
- historic structures
- park history
- museum management

PERFORMANCE-BASED MANAGEMENT

The Panel sought to identify ways to factor performance more strongly into budget decisions, increase accountability at the park level, and use performance measures as a learning and management tool to inform decision-making at all levels. Over the past three years, NPS has instituted two systems that can be used for these purposes: 1) a performance-based allocation process for cultural resources that adjusts Washington office (WASO) project funding allocations to the regions based on parks' prior year accomplishments and reporting on measures developed for the Program Assessment Rating Tool (PART); and 2) the NPS Scorecard system (based on GPRA, PART, and a variety of other measures) that assists in budget formulation, offers a potentially powerful learning and management tool at the park level, and allows park-by-park comparisons

Performance-Based Funding Allocation

The cultural resources performance-based allocation process applies only to the roughly $20 million in project funding that WASO provides to the regions each year. While resulting adjustments affect only a small portion of the total funding for cultural resources and focus on the regional offices rather than the parks, the performance-based allocation process seems to be directing attention to achievement of critical goals. The Panel recommends that WASO Cultural Resources continue implementation of the performance-based allocation process, as a means to improve program management as well as accountability. The Panel also recommends that NPS show forbearance in reallocating funds where regions miss goals for justifiable reasons. (Recommendation #1).

NPS Scorecard

The Panel commends NPS for developing the NPS Scorecard to begin to factor parks' performance and efficiency into service-wide budget decisions. Prior to Scorecard, NPS based most budget formulation decisions primarily on assessment of parks' needs. Scorecard also provides for transparency in park-by-park results for NPS staff service-wide. The Panel recommends that NPS expand use of the NPS Scorecard in budget formulation (Recommendation #2).

The Panel also believes that Scorecard offers a promising tool for improving park-level performance, above and beyond its utility in budget formulation. The Panel recommends several steps to improve Scorecard's utility as a management tool to inform resource management decisions by park staff, including the capacity to allow NPS staff to compare their own park's experience with groups of similar parks (Recommendation #3).

New Performance Measures

Although most performance measures align well with park cultural resources, the Panel recommends that NPS develop several new performance measures for use as appropriate with GPRA, PART, and other performance systems (Recommendations #10, 13, 16, and 18).

Electronic Systems

During the course of this review, many NPS staff expressed concern about the workload associated with electronic systems, including PMDS, PMIS, and FMSS. Because this review did not assess NPS electronic reporting systems and databases in detail, the Panel refrained from recommending that NPS undertake a review of these systems. However, the Panel believes that a significant opportunity may exist for NPS to improve integration of service-wide electronic reporting systems.

PARK SUPERINTENDENT ACCOUNTABILITY

Evaluation of a superintendent's performance by the regional director is the strongest mechanism identified during the course of this study for ensuring accountability across all elements of a park's mission. However, superintendent evaluations are no longer required to include any cultural resource elements. The Panel therefore recommends that park superintendent performance evaluations include resource stewardship (cultural and natural) as an element (Recommendation #4).

INCREASED FLEXIBILITY

The Panel concludes that additional flexibility in two areas would enable NPS to make better use of existing resources. First, the Panel believes that restrictions on travel imposed by travel ceilings and across-the-board reductions are at odds with the service-delivery model NPS has adopted (i.e., reliance on shared cultural resource professionals among parks and from regional offices) in response to staffing reductions (Recommendation #5). Second, the Panel also recognizes the inefficiency and ineffectiveness of park staff rushing each year to obligate project funds due to the "squeeze" created by delays in receiving spending authority and contracting offices' deadlines to submit procurement requests. The Panel recommends that NPS seek to increase the time parks have to obligate project funds each year (Recommendation #6).

FUNDING AND STAFFING

In addition to the recommendations outlined above, the Panel concludes that additional funding and staffing are critical to improve stewardship of, and reduce risks to, park cultural resources.

Over the past two decades, the responsibilities of park cultural resource programs have grown substantially, including the addition of 30 new parks, which are predominantly cultural and historical in value. In contrast, inflation-adjusted funding for park cultural resource programs decreased by 0.2 percent per year from FY1995-2008, while over the same period inflation-adjusted funding for natural resource programs increased by an annual average of 4.2 percent. While there was real growth in funding for park cultural resource programs FY1995-2002, inflation-adjusted funding has decreased by 19 percent since FY2002. Largely as a result of the Natural Resource Challenge, funding for natural resource programs today is double that for park cultural resource programs, notwithstanding the fact that two-thirds of the 391 national parks were created because of their historic and cultural significance.

Staffing levels show a similar divergence. As Appendix K indicates, cultural resources and natural resources had nearly identical staffing levels in FY1995: 1,079 FTE for cultural resources, and 1,072 FTE for natural resources. During the period FY1995-2008, staffing levels for natural resources rose by 335 FTE (31.2 percent), primarily as a result of the Natural Resource Challenge, while staffing levels for cultural resources declined by 294 FTE (27.4 percent). Natural resources staffing is now 79 percent greater than cultural resources staffing. According to NPS staff at all levels, the decline in overall staffing levels for cultural resources is exacerbated by increasing reliance on term employees and impending retirements of many key staff.

Based on the scope, complexity, and condition of park cultural resources, the Panel concludes that NPS park cultural resource programs are under-funded and under-staffed. The trend of park cultural resource programs bearing a disproportionate share of budget and staffing reductions should be halted. Over the period FY1999-2006, the Natural Resource Challenge bolstered NPS stewardship of natural resources by an additional $77.5 million to meet critical needs. The Panel recommends that NPS develop a clear, compelling and comprehensive proposal for an initiative of similar magnitude to improve stewardship of park cultural resources, and seek increased funding and permanent positions to reduce risks to cultural resources of national significance (Recommendation #7). Successfully carrying out a service-wide initiative on park cultural resources will require dynamic WASO leadership to engage staff from the parks, regional offices, and centers.

NATIONAL LEADERSHIP

In addition to the steps outlined above, the Panel also recognizes that strong WASO leadership is required to effectively address and improve NPS stewardship of park cultural resources. The Panel therefore recommends that NPS undertake, as an urgent priority, the additional steps required to transform WASO Cultural Resources into a high-performing organization, with close oversight by the NPS Director's office. If it is not possible to make the current organization high performing, the Panel recommends that NPS create a separate Associate Director for Park Cultural Resources. (Recommendation #8)

The Panel recognizes that critical challenges to the successful creation of a high-performing organization exist. First, the WASO Park Cultural Resources unit remains significantly under-staffed. Since 2005, when a major reorganization changed the structure of the Cultural Resources Directorate and reassigned many senior staff and managers, WASO staff working on park cultural resources has declined from approximately 28 FTE to approximately 22 FTE. NPS staff indicate that efforts are now underway to fill a number of vacancies, several of which are long-standing.

Second, the total levels of funding and staff that the parks and regional offices commit to resource stewardship seems to reflect a growing disparity between programs. Since 2005 (the year of the reorganization of WASO Cultural Resources), both natural resource and cultural resource programs have experienced staff reductions, but cultural resources has lost far more staff (147 FTE, or 15.8 percent) than natural resources (19 FTE, or 1.3 percent). This disparity was especially pronounced over the past year (FY2008), as park cultural resources staffing

declined by 74 FTE (8.6 percent) while natural resources experienced an increase of 20 FTE (1.4 percent).

Third, interviews with NPS staff who work in the parks, regional offices, and centers revealed widespread concern about the frequency and quality of communications from WASO, lack of engagement of field staff in strategic planning and goal setting, and ineffective advocacy for park cultural resources. In the Panel's view, this is contributing to a deterioration of the relationships between WASO and the field and has the potential to negatively impact WASO's ability to effect change.

The Panel urges NPS to weigh the overall advantages, disadvantages, and tradeoffs involved in creating a separate Associate Director for Park Cultural Resources. This option would place cultural resources on a par with natural resources, which has its own Associate Director, and recognize that two-thirds of the parks were created because of their cultural resources. It would also recognize the fact that the policies and skills required for direct fiduciary management of park assets are fundamentally different than those required to manage a grants and regulatory program designed to incentivize preservation of non-federal properties.

INDIVIDUAL PROGRAM RECOMMENDATIONS

The Panel finds that the application of FMSS to archeological sites, cultural landscapes, and historic structures is unsatisfactory due to this system's reliance on Current Replacement Value, which is difficult to calculate for historic resources. That said, the Panel concludes that FMSS offers a practical means for park cultural resources to compete for maintenance, rehabilitation, and repair funding, and encourages NPS to develop more accurate estimates of deferred maintenance for maintained archeological sites and cultural landscapes.

Archeology

The Panel concludes that the Archeology Program needs more strategic focus to direct attention and resources to critical activities and highest priority sites. Most archeologists in the parks and regional offices have been occupied for the past few years with completing site condition assessments in response to the 2004 Heritage Assets Audit. The Panel recommends that NPS revise regional Corrective Action Plans (Recommendation #9), develop an additional performance measure that takes sites' significance and vulnerability into account (Recommendation #10), and accelerate the conversion of ASMIS to a web-based system (Recommendation #11).

Cultural Landscapes

Although the Cultural Landscape Program is still maturing, it is functioning well with all regions making slow but steady progress in establishing a baseline inventory of park landscape resources. The Panel offers no formal recommendations for the Cultural Landscapes Program.

Historic Structures

The Historic Structures Program is a mature, well functioning program according to NPS staff at all levels, although the $1.9 billion estimate of deferred maintenance makes clear the magnitude of unmet needs. The Panel finds troubling the fact that there are currently 2,811 historic structures of national significance in *poor* condition. In most parks, resource managers reportedly work in close partnership with facilities maintenance staff, whose support is critical to preserving historic structures. Recognizing that available funds are inadequate to maintain all structures in good condition, NPS has developed practical tools to prioritize the treatment of structures. The Panel recommends that NPS reconcile the significant differences between LCS and FMSS so that their listings of historic structures coincide (Recommendation #12).

History

The Panel recognizes the value of both administrative histories and historic resource studies for managing park cultural resources. The Panel recommends that NPS develop separate performance measures for these studies and administer funding for these histories and studies from a single fund source (Recommendation #13).

Museum Management

The Panel concludes that NPS is failing to fulfill its public trust for museum collections, because 45 percent of its collections are not cataloged. As a result, 56 million items are irretrievable and unavailable to park staff, researchers, and the public. Recognizing that the backlog is a service-wide problem, the Panel offers the following recommendations:

- Projects that produce field collections should assure their cataloging, and records unrelated to managing park resources should not be sent to museums (Recommendation #14).

- Museum staff need to recognize the important difference between cataloging museum objects and archives and follow professional methods for archives (Recommendations #15 and 16).

- NPS should improve access to museum collections by park staff, researchers, and the public (Recommendation #17), and begin to report the use of its museum collections as a performance measure (Recommendation #18).

CONSOLIDATED LIST OF RECOMMENDATIONS

The Panel's formal recommendations are listed below for easy reference. Chapter 4 provides fuller discussion of the Panel's findings and rationale.

Recommendation #1: The Panel recommends that WASO cultural resource programs continue the performance-based allocation process for adjusting project funding allocations to the regions as a means to improve program management as well as accountability. WASO needs to insist on timely and accurate reporting, seek early identification of problems, and exercise forbearance in reallocating funds when the regions miss goals for justifiable reasons, using each failure as a learning opportunity.

Recommendation #2: The Panel recommends that NPS expand use of the NPS Scorecard as a budget formulation tool, including providing increased outreach, training, and technical assistance to NPS staff at all levels.

Recommendation #3: The Panel recommends that NPS make full use of the NPS Scorecard as a management tool so that park superintendents and resource managers can track changes over time and make comparisons with similar parks by: adding additional informational measures for cultural resources and other programs; developing the capability to allow comparisons with groups of similar parks; accelerating development of benchmark standards; highlighting exemplary practices; and expanding outreach, training, and technical assistance to NPS staff at all levels.

Recommendation #4: The Panel recommends that NPS include resource stewardship (cultural and natural) as an element in all superintendents' performance evaluations, in particular with respect to park cultural resources at risk.

Recommendation #5: The Panel recommends that NPS seek sufficient travel ceiling to support skill-sharing between parks and regional offices, meet critical training needs, and facilitate cross-learning.

Recommendation #6: The Panel recommends that NPS expand the time that parks have to obligate project funds each fiscal year by applying assessments at the beginning of the year, accelerating the availability of approved funds, and streamlining contracting procedures.

Recommendation #7: The Panel recommends that NPS undertake an intensive service-wide effort (similar to the Natural Resource Challenge) to develop a comprehensive proposal, clear priorities, and sound justification to improve stewardship of park cultural resources, and seek increased funding and permanent staff to reduce risks to cultural resources of national significance and meet other critical needs.

Recommendation #8: The Panel recommends that NPS significantly strengthen WASO leadership to improve stewardship of cultural resources throughout the parks by: 1) implementing the changes needed to make the current WASO organization high performing; or 2) creating a separate Associate Director for Park Cultural Resources.

Recommendation #9: The Panel recommends that NPS revise regional Corrective Action Plans for the archeology program, as needed, to take into account the time and cost involved in traveling to archeological sites.

Recommendation #10: The Panel recommends that NPS accelerate efforts by WASO and field staff to develop a new performance measure for the archeology program that takes sites' significance and vulnerability into account.

Recommendation #11: The Panel recommends that NPS accelerate completion of the conversion of ASMIS to a web-based system to improve access to archeological site data and better meet the needs of archeologists in the parks and regional offices.

Recommendation #12: The Panel recommends that NPS develop an expeditious and efficient schedule to ensure that all parks reconcile differences between LCS and FMSS so that these two systems' records of historic structures (assets) coincide.

Recommendation #13: The Panel recommends that NPS develop separate performance measures for park administrative histories and historic resource studies and administer funding for these histories and studies from a single fund source.

Recommendation #14: The Panel recommends that NPS enforce current policy to avoid inappropriately adding to museums' uncataloged backlog by: deeming "incomplete" any project that produces uncataloged field collections; administering research permits to ensure that collections produced and intended for long-term preservation are cataloged; ensuring that archival records that are unrelated to resource management are not accessioned by museums; and creating regional review panels to ensure that large donations (e.g., archival collections >100 linear feet) are consistent with a sound museum management plan and scope of collection.

Recommendation #15: The Panel recommends that NPS ensure that museums follow professional archival methods by: expediting revisions to Appendix D of the Museum Handbook; appointing a fully qualified regional archivist for every region; developing and delivering training in professional archival methods for all staff involved in archiving; and providing on-site technical assistance to demonstrate the practical application of professional archival standards.

Recommendation #16: The Panel recommends that NPS use separate measures to track the backlog of archives and other museum items.

Recommendation #17: The Panel recommends that NPS make public search tools more user friendly, ensure that museum staff use the web catalog module of ANCS+, and provide training as necessary.

Recommendation #18: The Panel recommends that NPS develop a new performance measure (based on data that museums already report) to track and report the use of museum collections by park staff, researchers, and the public.

CHAPTER 1

INTRODUCTION

GENESIS AND SCOPE OF THIS REVIEW

In January 2008, the National Park Service (NPS) contracted with the National Academy of Public Administration (the Academy) to undertake an independent review of its park cultural resource programs.[1] NPS commissioned this review to implement the Management Improvement Plan agreed to with the Office of Management and Budget (OMB) as follow-on to the 2004 Program Assessment Rating Tool (PART) review by OMB, which judged the park cultural resource program "adequate". The PART review noted that NPS park cultural resource programs had never been independently reviewed and recommended that NPS strengthen performance assessment, link budgeting more closely to performance, and clarify roles and responsibilities among the parks, regional offices, and the Washington office. The Academy's review was designed to meet the following objectives:

- assess the appropriateness of current performance measures and targets and suggest alternatives for consideration

- assess how current performance measures are being used in budget, resource allocation and management decisions, and suggest improvements

- recommend other changes to improve NPS stewardship of park cultural resources

STUDY METHODOLOGY

The Academy convened an expert Panel to review NPS park cultural resource programs, guide the Academy staff's research, and make recommendations for improving NPS stewardship of park cultural resources. Appendix A provides biographic sketches of the three Panel members and key project staff.

In addition to the Panel's experience in preservation, performance-based management, and the operations of the national park system, the Academy created a 14-member Working Group to provide input, assistance, and advice to the Panel. NPS identified nine staff to serve on the Working Group, drawn from the parks, regional offices, and Washington office to provide a range of perspectives and expertise in the cultural resource programs under review. The Academy added five other subject matter experts to provide external perspectives and ensure balance. The Working Group was integrally involved over the course of the project and provided valuable insights, advice, and interpretation of feedback from interviews, which validated the research findings. Appendix B provides a list of the members of the Working Group, who deserve thanks for their hard work, significant contributions, and volunteered time.

[1] This review was undertaken at the initiative of the Associate Director, Cultural Resources.

This review of NPS cultural resource programs relied on three research methods:

- background interviews with Working Group members
- interviews with NPS staff at all levels of the service as well as other experts and stakeholders who have a range of perspectives on the management of cultural resources in national parks
- examination of various DOI and NPS policy and program documents, including strategic plans, budget justifications, management policies, and program guidelines

The project work plan initially called for 50 interviews with NPS staff and external experts. Because these interviews identified additional research needs and failed to produce clear patterns regarding NPS management systems, the Academy conducted additional interviews, ultimately more than doubling the original target. Appendix C lists the individuals the Academy study team interviewed, who can be categorized in the following categories:

Category	Number
Park Superintendents	12
Other Park Staff	36
Regional Office Staff	33
Washington Office Staff	20
Other Experts and Stakeholders	15
Total	**116**

The Academy's study team identified the regional offices and parks for site visits and individuals to interview based on criteria including park size, primary mission, and geographic region with the goal of ensuring diversity in perspective and coverage of the breadth of resources across the National Park System. The study team conducted site visits to four regional offices and 14 parks, and interviewed NPS staff from all NPS regional offices and all cultural resource disciplines, in addition to a range of external experts and stakeholders. Interviews, which averaged approximately one hour, were conducted both in-person and by phone. The majority of interviews were one-on-one; some in-person interviews with NPS regional office and park staff were conducted in small groups. Interviewees were assured their responses would be not be attributable and that the results of the interviews would be aggregated. Appendix D provides the questions used to conduct the interviews.

OVERVIEW OF PARK CULTURAL RESOURCE PROGRAMS

Park cultural resources encompass seven programs, although not all parks include all programs:

- archeology
- cultural landscapes
- ethnography
- historic structures
- history
- museum management (both museum collections and archives)
- Native American Graves Protection and Repatriation Act (NAGPRA)

Due to budget and time constraints, the Academy and NPS agreed to exclude the ethnography and the park NAGPRA programs from this review. The 2004 PART review conducted by OMB also did not include these two programs.

CURRENT GOALS AND MEASURES

NPS uses a number of measures to assess the performance of park cultural resource programs. Table 1 below provides a simplified summary of current measures for cultural resource programs. Appendix E provides more detailed information from the NPS Budget Justification about these goals and measures. Since 2006, the parks have reported on four GPRA goals related to the condition of cultural resources. In addition, the Washington office (WASO) reports on four "NPS goals," which track progress in inventorying cultural resources based on information in service-wide cultural resource databases.[2] In addition, the Cultural Resources Directorate negotiated agreement with OMB on eight PART measures, which are a combination of park GPRA goals, NPS goals, and other measures.

Table 1
Summary of Goals and Measures for Park Cultural Resource Programs

GPRA	NPS	PART	PROGRAM / MEASURE
			Archeology
X		**X**	Percent of recorded archeological sites in good condition 2007 Actual: 40.2% 2012 Target: 42.5%
	X		Number of archeological sites inventoried and evaluated with complete, accurate, reliable information in ASMIS[3] 2007 Actual: 68,327 2012 Target: 72,737
			Museum Management
X		**X**	Percent of collections in good condition (i.e., maintained according to museum property management standards)

[2] These "NPS goals" had previously been reported as park GPRA goals.
[3] Archeological Sites Management Information System

GPRA	NPS	PART	PROGRAM / MEASURE
			2007 Actual: 73.9% 2012 Target: 78.9%
	X	X	Percent of museum objects catalogued and submitted to the National Catalog 2007 Actual: 54.3% 2012 Target: 66.8%
		X	Average cost to catalog a museum object 2007 Actual: $0.81 2012 Target: $0.81
Historic Structures			
X		X	Percent of historic and prehistoric structures on the LCS[4] in good condition (both physical condition and integrity) 2007 Actual: 53.4% 2012 Target: 56.0%
	X	X	Percent of historic and prehistoric structures on the LCS that have complete, accurate, and reliable information 2007 Actual: 80% 2012 Target: 100%
		X	Condition of historic buildings as measured by the FCI[5] (physical condition only) 2007 Actual: 0.21 2012 Target: 0.21
Cultural Landscapes			
X		X	Percent of cultural landscapes on the CLI[6] in good condition (both physical condition and integrity) 2007 Actual: 47.6% 2012 Target: 50%
	X		Percent of cultural landscapes on the CLI that have complete, accurate, and reliable information (based on the FY2006 baseline) 2007 Actual: 19.7% 2012 Target: 82.4%[7]
History			
			None

[4] List of Classified Structures
[5] Facility Condition Index
[6] Cultural Landscape Inventory
[7] The 2012 target reflects progress against the current baseline

CHAPTER 2

UNDERSTANDING THE NATIONAL PARK SERVICE

Undertaking a review of NPS park cultural resource programs requires a larger understanding of NPS organizational structure, systems, norms and culture. This chapter provides background and context for reviewing park cultural resource programs.

OVERVIEW OF THE NATIONAL PARK SERVICE AND ITS PARKS

The National Park Service (NPS) is one of the operating bureaus of the Department of the Interior (DOI), and as such is subject to DOI policies and directives. NPS was created in 1916 "*to conserve the scenery and the natural and historic objects and the wild life [in national parks, monuments, and reservations] and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations*."[8] NPS is therefore charged with preserving places and things that are historically and culturally unique and important to our understanding of who we are as a people.

The National Park System consists of 391 parks. Although the public tends to associate NPS with the western parks that are famous for their natural wonders, about two-thirds of national parks were created because of their historic or cultural significance. Even parks considered primarily "natural" contain rich cultural resources, including historic structures, archeological sites, collections of artifacts, and places that are meaningful to a variety of ethnic groups. Conversely, most parks that were founded for their historical and cultural significance also have a wealth of natural resources.

Parks range in size from less than one acre to more than 13 million acres. While the public tends to think first of large parks, such as the Grand Canyon, Yellowstone, and Yosemite, in fact, the great majority of parks are small: 202 (52 percent) have less than 25 staff; and 276 (77 percent) have annual budgets of less than $3,000,000.[9]

National parks are authorized by Congress,[10] which ensures that areas designated as parks reflect priorities set through a democratic, political process. Each park has a specific statutory mission, and park missions vary as widely as the parks themselves—from the private homes of political leaders and poets to battlefields, wilderness areas, and places that are landmarks in the quest for

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[8] 16 U.S.C. 1 et seq.

[9] This includes 34 park units without operating budgets that receive funding through other parks.

[10] Under authority of the Antiquities Act of 1906, the President also may establish units of the NPS through designation of National Monuments by Presidential Proclamation; Congress has subsequently affirmed some of these units. Also, under the Historic Sites Act of 1935, the Advisory Board on National Parks, Historic Sites, Buildings, and Monuments (now the National Park System Advisory Board) was authorized to recommend to the Secretary of the Interior 'historic sites, buildings, and objects of national significance' for inclusion in the National Park System through designation by the Secretary as 'national historic sites.'

civil rights. Stewardship of park cultural resources is an important part of each park's mission and a core NPS responsibility in fulfilling its charge to preserve and protect the nation's historic and cultural heritage. Appendix F provides an organization chart of NPS.

Washington Office

The Director of NPS is appointed by the President and confirmed by the Senate. The Director, who holds ultimate authority, is located in Washington and supported by the program directorates in the Washington Administrative Service Organization (WASO), which is purposefully not referred to as "headquarters". Five Associate Directors and their staffs support the Director.

The Associate Director for Cultural Resources in WASO has responsibility for two spheres of cultural resources: park cultural resource programs, which deal with cultural resources within national parks, and the national historic preservation program, which addresses preservation activities external to the parks. Appendix G provides the organization chart for the WASO Cultural Resources Directorate. Within WASO, the historic preservation programs are significantly larger than park cultural resources in staff and funding (the ratio is approximately 75/25). NPS administration of the national historic preservation program involves: processing thousands of nominations for listing in the National Register of Historic Places; reviewing applications for federal historic preservation income tax credits; managing several competitive grant programs; and administering annual formula grants to state and tribal historic preservation offices. In contrast, NPS stewardship of park cultural resources involves directly managing the preservation and protection of thousands of structures, archeological sites and cultural landscapes and millions of museum objects, artifacts, specimens, and archives.

On July 1, 2008, WASO park cultural resource program staff totaled 21.2 full-time equivalents (FTE). The relatively small size of WASO park cultural resources staff deserves note, because it limits the scope and intensity of services provided to the parks and regional offices. In comparison, the WASO Natural Resources Program totals approximately 190 FTE, the vast majority of whom are duty-stationed outside Washington, DC and provide both direct technical assistance to park resource managers and detailed reviews of individual projects.

Decentralization of Authority

The 391 units of the National Park System are divided into seven regions. Regional offices have authority to apportion resources among the parks, while park superintendents prioritize resources within a park. Regional offices employ some cultural resource staff, whose assistance is shared among multiple parks in a given region. The WASO park cultural resource programs are staffed with substantive area experts who assist regional office and park staff in their respective areas of expertise.

The WASO Cultural Resources Directorate performs a range of functions, including setting policy (through NPS Management Policies and Director's Orders); developing guidelines and technical materials; designing and operating databases; coordinating national issues; tracking

accountability and accomplishment by the regions and parks for performance-based budget allocation; and reporting for various executive and legislative branch purposes.

The WASO Cultural Resources Directorate has little or no role in budget formulation decisions related to managing cultural resources in the parks. Indeed, the regional offices determine the allocation of more than 80 percent of cultural resources funding in response to parks' requests for projects and base funding. WASO programs exercise direct control over approximately $20 million in project funds, which amounts to approximately 10 percent of all funds that benefit park cultural resources (see Appendix H). Even for these funds, WASO does not select or approve individual projects for funding, but rather sets general guidelines and determines the allocation among the regional offices.[11] The seven regional offices use different processes for selecting park projects for funding. The role of the WASO Cultural Resources Directorate in performance-based allocation is limited to reviewing after-the-fact reports of accomplishment for WASO-funded projects and redistributing the following year's funds among the regions to impose penalties and rewards.

For historical context, NPS made far-reaching changes in 1995 that significantly decentralized authority. These changes included substantially reducing the number of regional staff, collapsing the number of regions from 10 to 7, making clear that regional office staff are primarily "service providers" to the parks, and ceding greater authority to park superintendents, such as authority for Section 106 reviews to assess the impact of federally-funded activities on historic properties.

Each park superintendent reports to his or her respective regional director. Thus, the formal line of authority runs from the NPS Director to the regional director to the park superintendent. WASO directorates support the NPS Director, while regional offices support the regional director and provide various services to the parks.

The performance of each park superintendent is evaluated annually based on an individual performance plan that outlines goals and expectations. Superintendents in both the Senior Executive Service (SES) and General Schedule (GS) positions collaboratively develop their performance plans with their rating official, usually the regional director. Performance plans for SES-level superintendents must include 2-6 rating elements, some of which are DOI-wide elements while others are position-specific. Performance plans for superintendents in GS positions include 1-5 critical elements. All performance plans must align with the DOI strategic plan and the NPS Director's initiatives. There is no requirement for superintendent performance plans to include an element related to park cultural resources.

Differences among NPS Regions

The National Park System is divided into seven regions, as shown in the map below. Significant differences exist among the regions and in how the regional offices and their parks interrelate with respect to park cultural resource programs. First, the size of regions varies greatly: the number of parks per region varies from 23 to 83, and the total acreage of parks varies by region from about 80,000 acres to more than 50 million acres.

[11] Prior to 1996, WASO's Cultural Resources Directorate reviewed and approved park cultural resources project plans and provided more technical assistance to the parks and regional offices.

Second, the division of professional staff and functions between parks and the regional office varies based on each park's resources and the nature and extent of authority delegated to the parks. Since only a handful of the very largest parks have a full complement of cultural resource professionals, most parks rely on regional office staff for many cultural resource functions. These include: cultural resource inventories and monitoring studies; historic structure reports; archeological inventories and site assessments; technical assistance with Section 106 reviews;[12] and cataloging (and in many cases storing) museum collections.

Many regions also have "centers" staffed by employees with expertise in various cultural resource programs that provide support to parks primarily in their region, including:

- Alaska Regional Curatorial Center in Anchorage, Alaska
- Historic Preservation Training Center, Frederick, Maryland
- Midwest Archeological Center in Lincoln, Nebraska
- National Capital Region Museum Resource Center in Landover, Maryland
- Northeast Museum Services Center in Boston, Massachusetts
- Olmsted Center for Landscape Preservation in Boston, Massachusetts
- Southeast Archeological Service Center in Tallahassee, Florida
- Western Archeological and Conservation Center in Tucson, Arizona

In addition, two national centers provide a range of other cultural resources support services to the parks:

- Denver Service Center, Colorado
- Harpers Ferry Center, West Virginia

[12] Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties, including consultation with state and tribal historic preservation offices.

Relationships between Regional Offices and Parks

Working relationships between parks and regional offices vary from region to region. Interviews suggest that some regional directors place greater priority on cultural resources than others, and that some regional directors are more supportive of performance-based management than others. Some regions place more emphasis than others on planning, including completing baseline cultural resources research reports and updating parks' General Management Plans.

Similarly, some regions have been more aggressive in conducting Core Operation Reviews to clarify the ideal structure of the regional office or park five years hence. Based on these reviews, some regional offices and parks have decided to eliminate some staff positions over time, including cultural resources positions. In addition, some regional offices are using buy-out and voluntary retirement authorities in FY2008 to reduce base salary costs in response to budget pressures.

Not surprisingly, superintendents and cultural resource managers from different parks view their regional offices differently. Some park superintendents and staff view their regional office as a full partner and "big sister" with valuable assistance to offer, whereas others view regional office staff as more of a hindrance than help.

Park Superintendents and Program Managers

Within each park, the park superintendent has ultimate authority to interpret policy, set priorities, allocate resources among programs, and hire staff (in some cases in consultation with regional office staff about which vacancies to fill). At the same time, a host of federal laws and regulations, DOI and NPS policies and directives, and NPS guidelines limit superintendent flexibility. For most superintendents, ensuring the enjoyment of park visitors is the most pressing concern.

Most superintendents organize their staff in groups of the following core functions:

- visitor services
- maintenance
- natural resources
- cultural resources
- administration

Depending on the nature and size of the park and its staff, these functions are bundled in different ways and with varying staffing complements. For example, cultural and natural resource programs are frequently combined under a unified "resource management" division. A few large parks have discrete staff for each cultural resource program, while in other parks a single staff person may be responsible for multiple cultural resource program areas. Many small parks have no staff dedicated to cultural resources, covering these responsibilities with staff from other divisions as collateral duties. Conversely, staff who fill cultural resource positions may spend a significant amount of time on collateral duties unrelated to cultural resources.

BUDGET AND STAFFING OVERVIEW

The total NPS budget for FY2008 is approximately $2.4 billion in appropriated funds and authorizes 20,739 full-time equivalent employees (FTE). The NPS FY2008 budget identifies $103 million and 859 FTE[13] for cultural resource stewardship. These resources support core cultural resource program operations, including a broad range of inventory, monitoring, research, and management activities. It is important to note, however, that other budget accounts provide funding for most of the maintenance, rehabilitation, and restoration of park cultural resources. In FY2008, an additional $122 million was available for these purposes from other accounts, principally from Facility Operations and Maintenance. NPS financial and project management systems do not systematically track and report historical data on all funds that benefit park cultural resources. Appendix H provides estimates developed by NPS staff of the sources of funds and amounts that supported park cultural resources for FY2008.

Parks, regional offices, centers, and WASO offices rely primarily on two broad categories of funds. The first, commonly known as "base funds," covers park operations and maintenance, salaries, and other core program costs. The second, commonly known as "project funds," covers one-time projects and the salaries of staff in term positions, the maximum duration for which is four years. Project funds may not be used to pay salaries of permanent staff. According to the Government Accountability Office, salaries and benefits account for 80 percent or more of the base funds of most parks.[14]

Changes in Funding Levels

Table 2 provides an overview of funding changes for selected NPS programs over the period FY1995-2008, based on data provided by the NPS Comptroller's office. The Park Management Account, which covers all national park operations except park police and external administrative costs, provides an overall measure of the funding changes that parks have experienced. Differences in the structure of the budget accounts and the unavailability of some historical data make the consistent comparison of aggregate expenditures that benefit park cultural resources and natural resources difficult. For comparability, Table 2 combines figures from accounts that fund core resource management and research activities for both cultural and natural resources. These totals do not include funds from other accounts that fund maintenance, conservation, rehabilitation, and restoration of both cultural and natural resources. Appendix I includes year-by-year funding levels enacted and adjusted for inflation as well as a graph of these trends.

[13] Only 785 FTE were actually used for park cultural resources in FY2008.

[14] National Park Service, Major Operations Funding Trends and How Selected Park Units Responded to those Trends for Fiscal Years 2001 through 2005. Government Accountability Office, GAO-06-431, March 2006.

Table 2
Growth in Funding for Selected NPS Programs
From FY1995 to FY2008
(Dollars in Thousands)

Funding Levels	FY1995 Enacted	FY2008 Enacted	Change	Annual Average Change	Annual Average Inflation-Adjusted[15] Change
Park Management[16]	947,393	1,744,453	+797,060	+4.8%	+0.9%
Cultural Resources[17]	63,688	102,649	+38,961	+3.7%	-0.2%
Natural Resources[18]	76,785	211,686	+134,901	+8.1%	+4.2%

Over the 14-year period FY1995-2008, enacted funding levels increased for cultural resources as well as for both park management and natural resources. After factoring in the increased cost of federal pay raises and benefits and accounting for inflation with respect to other expenses, funding for cultural resource programs decreased by an annual average of 0.2 percent in real dollars. Appendix I shows that, while cultural resource programs experienced real increases through FY2002, these increases were followed by annual average decreases of 3.5 percent thereafter. Overall, inflation-adjusted funding for cultural resources decreased by 19 percent over the period FY2002-2008.

In comparison, overall park management received an annual average increase of almost 1 percent in real terms over the same 14-year period. The vast majority of increases in the Park Management Account are due to the backlog maintenance initiative (FY2002-2006), increased law enforcement at "icon" parks after 9/11, and the Natural Resource Challenge account. It deserves note that the backlog maintenance initiative provided significant funding to maintain park cultural resources, particularly historic structures, although NPS financial systems do not track expenditures by resource category.

Over this same period, funding for natural resources increased in real terms by an annual average of 4.2 percent (or 71 percent over the 14-year period). The sharp difference between funding changes for cultural resources and natural resources is due primarily to the Natural Resource Challenge (see Appendix J). Launched in 1999, the Natural Resource Challenge engaged NPS staff at all levels to identify critical needs and target additional resources to natural resources throughout the National Park System. Originally proposed as a $100 million initiative over five years, the Natural Resource Challenge ultimately won Congressional approval of an additional $77.5 million over the period FY2000-2007 to meet priority natural resource needs, such as

[15] Inflation adjustments are based on the actual increases in average salary and benefits provided by NPS Comptroller's office and on the Consumer Price Index for other expenses.
[16] Includes Resource Stewardship, Visitor Services, Facility Operations & Maintenance, and Park Support accounts
[17] Includes Cultural Resources Applied Research and Cultural Resources Management accounts
[18] Includes Natural Resource Research Support and Natural Resources Management accounts

expanded inventory and monitoring of natural resources throughout the parks and restoration of the Everglades. NPS staff has consistently reported that the Natural Resource Challenge is widely considered a success.

In 2000, NPS developed a proposal for a Cultural Resource Challenge of a similar scale. The NPS Director approved the Cultural Resource Challenge, but the proposal was never formally transmitted to DOI or the Congress due to concern about the difficulty of securing funds to carry out two Challenges simultaneously.

Changes in Staffing Levels

Table 3 provides comparable data on staffing levels for park management, park cultural resources, and natural resources for the period FY1995-2008. Appendix K includes year-by-year staffing levels over this period.

Table 3
Changes in Staffing Levels for Selected NPS Programs
From FY1995 to FY2008

Staffing Levels	FY1995 Usage	FY2008 Usage	Change in FTE	Percent Change
Park Management[6]	15,548	15,161	-387	-2.5%
Cultural Resources[4]	1,079	785	-294	-27.2%
Natural Resources[5]	1,072	1,407	+335	+31.2%

Over the period FY1995-2008, staffing levels for park cultural resources declined by 27.2 percent. During the same period, park management experienced an overall staffing decrease of 2.5 percent, although most park programs experienced deeper staff reductions in order to accommodate an increase of approximately 1,500 FTE for law enforcement after the 9/11 terror attacks. In comparison, staffing for natural resources increased by 31.2 percent over the same period, which reflects achievement of the Natural Resource Challenge's goal to increase the number of natural resource professionals in the parks.

[6] Includes Resource Stewardship, Visitor Services, Facility Operations & Maintenance, and Park Support accounts
[4] Includes Cultural Resources Applied Research and Cultural Resources Management accounts
[5] Includes Natural Resource Research Support and Natural Resources Management accounts

PERFORMANCE IMPROVEMENT SYSTEMS

Planning, Management, Budgeting, and Performance Tracking Systems

NPS uses a variety of tools and systems for planning, managing, budgeting, and measuring and improving performance. These service-wide tools and systems are summarized briefly below.

Park Planning and Management Reviews

- General Management Plan, which sets forth a 20-year vision for each park
- Business Plan, which more than 80 parks have developed with the help of graduate students in business administration
- Core Operations Review, which can be conducted at any organizational level to identify core functions and optimal staffing complements
- Resource Stewardship Strategy, a combined plan for natural and cultural resources, which seven parks are piloting
- Park Asset Management Plan, which analyzes the current condition of the asset portfolio; specifies operations and maintenance requirements based on industry standards; notes current park funding available; identifies the gaps between funding and requirements; and provides strategies for maximizing the use of funds
- Five-year Strategic Plans, which are required for all parks along with annual performance plans and reports

Performance Measurement

- Performance Management Data System (PMDS)—a web-based tool to facilitate creation of park strategic plans, annual plans, and annual reports. PMDS serves as a repository for all park and program performance targets and achievement of goals associated with GPRA and NPS goals.
- PARTWeb—an interactive web-based system designed to collect and monitor program-specific performance measures developed for the Program Assessment Rating Tool (PART) process. See Table 1 for a summary of the eight PART measures for park cultural resource programs.

Budget Formulation and Project Funding Tools

- Operations Formulation System (OFS)—a web-based system designed to help parks, regional offices, and the Washington office identify and prioritize ongoing and operational funding needs and formulate budget requests.
- Project Management Information System (PMIS)—a web-based system to manage service-wide information about project funding, including the development of project statement requests and tracking projects and reporting progress to completion.

Other Systems

- Facility Management Software System (FMSS)—a web-based system designed to manage the construction, maintenance, and repair of all NPS assets. FMSS includes data on the total cost of ownership, asset life-cycle maintenance requirements, standard estimates for construction costs, and specific attributes to help describe and manage heritage assets. FMSS is used to record work orders to correct deferred maintenance deficiencies identified through inspections. Work orders are then bundled by the Project Scoping Tool to create projects in PMIS, which are rated and ranked for funding in PMIS based on the total project score using the DOI budget formulation guidance criteria. The WASO Park Facility Management Division is responsible for the design, oversight, and management of FMSS.

- Planning Environment and Public Comment (PEPC) System—a web-based tool designed to facilitate the process for review, impact assessment, and public comment on federal activities that may impact the environment or natural and cultural resources.
- NPS Scorecard[19]—an internal online tool to evaluate performance and efficiency so as to facilitate a more consistent and transparent approach to budget prioritization. NPS Scorecard compares parks relative performance and efficiency using 18 "scored" measures. Scorecard also includes additional "informational" measures related to park operations and resource management. Begun as an initiative of the Comptroller's office in FY2005, the NPS Scorecard has evolved significantly with the advice of park and regional office staff on the Scorecard Advisory Group. NPS Scorecard gives park staff the ability to compare their experience with other parks. Appendix L provides additional information on NPS Scorecard and both scored and informational measures.

Cultural Resource Inventory Databases

Various federal laws, executive orders, and NPS standards and guidelines require NPS to develop and maintain inventories of park cultural resources.[20] The four primary inventories that NPS maintains of park cultural resources are:

- Archeological Sites Management Information System (ASMIS)—a database that includes a large dataset of detailed information about archeological resources, for which park staff input data

[19] Note that the NPS Scorecard differs from the Executive Branch Management Scorecard, which tracks progress on government-wide management initiatives.

[20] Section 110 (a)(2) of the National Historic Preservation Act of 1966 as amended, Standards 2 and 3 of the Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs (pursuant to the National Historic Preservation Act), Section 3(a) of Executive Order 13287 (Preserve America), and Section 5.1.3.1 of the NPS Management Policies, 2006.

- Automated National Catalog System (ANCS+)—a database for the National Catalog of Museum Objects, which park staff use to input detailed records of cultural objects, archival and manuscript materials, and natural history specimens
- List of Classified Structures (LCS)—a database of information about historic and prehistoric structures, for which regional office staff input data
- Cultural Landscapes Inventory (CLI)—a database of historic designed landscapes, historic vernacular landscapes, ethnographic landscapes, and historic sites, for which regional office staff input data

Evolution of GPRA, PART, and Performance-Based Budgeting

When the Government Performance Results Act (GPRA) was first enacted, DOI relied on each of its bureaus to develop its own strategic plan and performance goals. According to senior NPS staff, NPS implementation of GPRA is highly regarded within DOI and generally considered more advanced than other bureaus, partly because NPS implemented GPRA at the park level. NPS developed its strategic plan based on park-specific goals, and each park in turn developed an annual performance plan and prepared an annual performance report. Service-wide totals were developed by aggregating parks' goals. The disadvantage of this high level of specificity was a proliferation in the number of goals, which staff of DOI, Congressional committees, and OMB reportedly found overly complex and confusing.

In 2004, DOI developed a Department-wide strategic plan to take the place of its bureaus' strategic plans. The DOI strategic plan identified national goals based on elements that were consistent across its bureaus, placing strong emphasis on monitoring and improving resource condition. Since many Department-wide goals had limited relevance at the park level, the parks continued to use and report park-specific goals in addition to the Departmental goals.

In 2006, in response to regional directors' objections about the number of goals, the Office of Strategic Planning, in consultation with the Regional Performance Management Coordinators and with the approval of the National Leadership Committee, dropped most goals that were not in the DOI strategic plan or OMB PART measures. This change significantly reduced parks' overall number of GPRA goals; for example, the number of goals for park cultural resource management was reduced from 15 to 4.

In 2004, OMB assessed NPS park cultural resource programs with the Performance Assessment Rating Tool (PART), which rated the program "adequate". This assessment used four GPRA measures and four additional PART measures (see Table 1). With encouragement by OMB, the WASO Cultural Resources Directorate began using the PART measures for performance-based allocation.

For park cultural resource programs, "performance-based allocation" refers to the adjustments that WASO makes to regional cultural resource project funding allocations based on after-the-fact assessments of parks' accomplishments and reporting on projects funded by the approximately $20 million of WASO funds that are centrally administered. For FY2006, WASO noted "discrepancies" (i.e., either inadequate reporting on or completion of projects) in about 10

percent of projects (47 out of 486). For FY2007, the percentage of discrepancies fell to about 2 percent (11 out of 502). As described in more detail in the following chapter, WASO applies penalties on a regional basis to the following year's project funds for underperformance for each cultural resource program, and redistributes those funds to regions that met agreed-upon targets. The amount of "puts and takes" is relatively small in the overall scheme of things—$639,000 was redistributed in FY2007, or about three percent of the amount of funds that WASO cultural resource programs administered in that year.

Historically, the NPS budget formulation process has been driven primarily by parks' justification of need, rather than performance. Regions set priorities among the various parks' requests based primarily on their assessment of parks' needs as developed in OFS and PMIS, taking into account capacity limitations as evidenced by a park's recent failure to produce on a project, which is reportedly a relatively rare event. The Comptroller then weighs the seven regional offices' prioritized requests and factors the Director's priorities into developing the overall NPS budget request, which is reviewed by the National Leadership Council.[21] While performance information is not utilized to set service-wide priorities in developing budget requests, it is used after budget decisions are made to justify budget requests by quantifying the level of performance that will be gained or lost as a result of changing budget scenarios.

[21] The National Leadership Council is composed of the Director, Chief of Staff, Deputy Directors, Associate Directors, Regional Directors, and Comptroller.

CHAPTER 3

PARK CULTURAL RESOURCE PROGRAMS

This chapter separately discusses the five park cultural resource programs under review: archeology, cultural landscapes, historic structures, park history, and museum management. Discussion of each program is organized as follows:

- description of the resource base
- overview of each NPS program
- goals and measures
- performance-based allocation
- feedback from interviews
- examples of resources at risk

The Panel requested WASO staff who served on the project Working Group to provide at least one example for each park cultural resource program area to highlight nationally significant resources at risk. The Panel did not perform any analysis to assess whether these examples are broadly representative across the parks. Nevertheless, the Panel believes that the examples included in this report illustrate that park cultural resources of national significance are at risk.

ARCHEOLOGY

Resource Base

The 84 million acres that NPS manages include an abundance of archeological sites. To date, about 2 percent of park acreage has been surveyed for archeological resources. As of the end of FY2007, these surveys have identified 68,327 archeological sites in 318 parks, of which 43,669 have site records in the Archeological Sites Management Information System (ASMIS) that are considered to be complete, accurate and reliable. Estimates of yet to be discovered sites range from 500,000 to 2,500,000.

Archeology Program

The mission of the NPS Archeology Program encompasses both archeology within national parks as well as assistance to other federal agencies and foreign governments. (The Academy's review addresses only issues related to archeology within the parks.) NPS Director's Order #28A sets forth the authorities, responsibilities, delegations, program requirements, standards and guidelines for the park archeology program. The WASO Archeology Program has a staff of five archeologists: 1.5 FTE are devoted to the park archeology program and 3.5 FTE work on the external assistance program. WASO provides a range of overall program management activities, including:

- developing policy, guidance, and procedures

- maintaining ASMIS, the archeological database
- coordinating, monitoring, and reporting on the use of Systemwide Archeological Inventory Program (SAIP) funds, the only source of dedicated funds for park archeology
- developing annual budget requests
- establishing performance targets, reporting requirements for SAIP projects, and evaluating region's performance as part of the PART-mandated performance-based allocation process
- reviewing archeological site nominations to the National Register
- advising parks on complex or controversial archeological issues

About 200 archeologists are stationed in the regional offices, centers, and parks, of which about one-quarter are in term positions covered by project funds. Approximately one-third of the NPS archeology workforce will be eligible to retire in the next five years. In most regions, relatively few parks have a dedicated archeologist; most are stationed at regional offices or the three archeological centers in Tallahassee, Lincoln, and Tuscon, which support parks in their respective regions.

Park superintendents are responsible for ensuring that archeological sites in parks are identified, evaluated, documented, protected, preserved, and interpreted. The basic element of a park's archeological resources management program is an *archeological overview and assessment*, which is required for each park. This document is a research report produced for a park as the first step in determining the requirements for additional research that may be needed for resource management purposes, including archeological identification and evaluation studies.

In 1992, the NPS established the Systemwide Archeological Inventory Program (SAIP) as a long-term, systematic effort to locate, evaluate, and document archeological sites in parks. The SAIP program sets minimum requirements, standards, and priorities for regions and parks, and is tailored to regions through development and implementation of regionwide and clusterwide archeological survey plans. Since 1992, the parks, regional offices, and centers have inventoried more than one million acres and located about 23,000 previously unknown archeological sites.

For archeological inventory activities WASO allocates approximately $2.3 million to the regions each year using a formula developed in 1997 that reflects core funding needs, the number of parks, and total park acreage. These dedicated SAIP funds account for only a small fraction of the total resources devoted to archeological projects: in FY2007 NPS secured an additional $12.4 million from more than a dozen other public and private sources to support a total of 325 archeological projects.

Archeology Goals and Measures

Condition Assessments of Sites

The percentage of recorded archeological sites in good condition is both a GPRA goal and a PART measure. The FY2007 actual is 40.2 percent and the target for FY2012 is 42.5 percent.

Initial condition assessments must be completed by a professional archeologist to record "complete, accurate, and reliable information," which is then entered into the required fields of ASMIS. Based on national criteria, the field archeologist determines the appropriate interval for follow-up assessments, which range up to and beyond 15 years.

Inventory and Evaluation of Sites

The number of additional archeological sites inventoried and evaluated is a WASO-reported NPS goal but not a PART measure. Data are gathered and reported by WASO staff using information entered into ASMIS by regional offices and parks. In FY2007, 1,072 sites were added for a total of 68,327. The target for FY2008 is an additional 900 sites; the FY2012 target is for a total of 72,737 sites to be inventoried, evaluated, and entered into ASMIS.

Performance-Based Allocation

Since the 2004 PART audit, WASO implemented performance-based allocation for SAIP funding that is based 50 percent on timely and accurate reporting and 50 percent on meeting nationwide targets for completing site condition assessments. For FY2008, WASO withheld and redistributed a total of $148,000 (or about 5 percent of all SAIP funds) based on reporting problems in FY2007.

Feedback from Interviews

The NPS staff interviewed pointed out a number of weaknesses in current GPRA goals and PART targets and expressed broader concerns with the archeology program's priorities.

Sites' Significance and Vulnerability

Several park, regional office, and WASO archeologists pointed out that by focusing on the percent of all sites in good condition the GPRA goal has the effect of treating all sites equally, thereby overlooking important differences in their significance and vulnerability. One regional archeologist emphasized this point with the comment, "The GPRA measure gives every lithic scatter[22] site the same weight as Cliff House at Mesa Verde."

Several field archeologists observed that significant sites that are in jeopardy should be the foremost priority of NPS. WASO staff concurred, noting that extreme weather events, drought, and rising sea levels caused by climate change may pose new and serious threats to archeological sites, both sites already identified and resources yet to be discovered.

[22] Lithic scatter is a surface scatter of cultural artifacts and debris that consists entirely of lithic (i.e., stone) tools and chipped stone debris. This is a common prehistoric site type that is contrasted to cultural material scatter, which contains other or additional artifact types such as pottery or bone artifacts, to a camp which contains habitation features, such as hearths, storage features or occupation features, or to other site types that contain different artifacts.

Site Condition Receives Too Much Emphasis

While acknowledging that the condition of archeological sites is a vitally important factor, a strong majority of archeologists believe that the focus of the current GPRA goal and PART measures on condition is misplaced, as the following comments by field staff illustrate:

- "The current preoccupation with condition is based on the misplaced 'heritage asset management' mindset. The importance of archeological sites lies in the *information* they offer in interpreting the past to understand history."
- "By focusing on the condition of individual sites, we are 'missing the forest for the trees.' We need to discern and explain how each piece fits into the larger archeological puzzle to provide historical context."
- "Putting so much of our resources into monitoring site condition comes at the expense of inventory. Some remote river valleys of one million acres have received only four days investigation."

Since 2004, park and regional archeologists have focused primarily on site condition assessments, completing more than 7,000 such assessments. One region has reoriented its work plan to focus almost exclusively on condition assessments; some regions have redirected funds for this purpose; and other regions are taking advantage of already-scheduled survey and inventory projects to conduct site assessments. Most NPS staff interviewed consider the pressure to complete site assessments as increasingly disrupting their program, distorting priorities, and wasting scarce funds to the detriment of the resource.

The current emphasis on site assessments grew from a 2004 independent audit of heritage assets, which identified deficiencies in NPS stewardship of archeological resources, including the lack of condition assessments for about half of the sites recorded in ASMIS. At the request of the WASO Cultural Resources Directorate, each region developed a Corrective Action Plan for completing condition assessments and entering ASMIS records. Four regions committed to completing condition assessments of all documented sites by the end of FY2008, while the other regions set longer timelines based on the number of sites and the projected staffing and funding available to do the work (e.g., one region adopted FY2027 as its goal).

For the past three years, all regions have met or exceeded the targets by assessing sites that are relatively accessible, i.e., "picking the low hanging fruit." However, as the time and expense of traveling to distant sites increases, NPS staff predict that several regions will fail to meet targets in the future. Regions whose parks are large, distantly located, or in wilderness areas face much greater challenges and expense to conduct archeological site condition assessments than regions with predominantly small land areas and urban and suburban parks. Interviews with regional office and park archeologists and cultural resource managers raised the following concerns:

- "Our region and several others are facing a 'train wreck' next year. Since we have picked all the 'low hanging fruit' to meet our targets for the past two years, it's humanly impossible to keep hitting the numbers with the resources we have."

- "The 'minimum tool test' for wilderness areas literally requires us to mount an expedition to reach many remote sites to assess their condition."
- "Since we only have a three-month window for fieldwork in Alaska, the September 30 deadline for submitting GPRA data to strategic planning is unrealistic. We need to work through our field notes first, which typically takes months."

For some time, both WASO and field archeologists have recognized problems with the current GPRA goal and PART measure. In FY2007, the WASO Archeology Program began discussions with the regional SAIP and ASMIS coordinators with the aim of developing alternative measures and targets that would replace or augment the ones focused on site condition, but differences in archeological resources in the parks and in archeologists' priorities have frustrated reaching agreement on an alternative measure. Some field archeologists indicated that differences in the size of parks and the nature of their archeological resources are so great that a single measure is not practical across the service.

Confusion Over Reinspection Intervals

Several park and regional archeologists strongly objected to the perceived requirement to reinspect every archeological site every five years *ad infinitum*. WASO staff clarified that such concerns are based on a misunderstanding of current requirements. In 2007, the Archeology Program issued guidance that makes clear that as part of each site condition assessment, the field archeologist shall determine the interval of subsequent reinspections, which may range up to and beyond 15 years.[23]

Concerns with Applying FMSS to Archeology

A majority of the field archeologists interviewed expressed concern about applying the Facility Management Software System (FMSS) to archeological sites. A team of NPS staff from across the country has been working for the past 18 months to develop criteria to define "maintained archeological site" and procedures for applying FMSS to these sites. It is expected that approximately 10 percent of archeological sites will ultimately qualify as "maintained," or about 6,800 of the current universe of sites. Interviews with field staff prompted the following concerns about FMSS:

- "FMSS is a clunky program that's unfriendly to users. Its application to historic structures is bad enough; stretching it to include archeological sites is lunacy."
- "At best, applying FMSS to archeology requires the consistent application of the fiction that archeological sites' Current Replacement Value can be calculated (as FMSS requires)."

[23] Guidance for Determining Archeological Site Condition and Recording It In ASMIS, issued September 27, 2007, by the NPS Chief Archeologist.

WASO staff and a minority of field staff interviewed held the opposite view that current efforts to include archeological sites in FMSS are an effective way to predict archeological sites' life-cycle maintenance costs and a sound basis for sites to compete for facility maintenance and stabilization funding. They noted that FMSS serves adobe structures and masonry ruins relatively well and expressed support for the emerging consensus to define 'maintained site' narrowly.

Concerns with ASMIS

Field staff expressed frustration with the limitations of the current Access-based platform of ASMIS, including its inability to compare data across regions. WASO program staff agreed with these criticisms from the field and indicated that work is underway to convert ASMIS to a web-based system as a result of the 2004 Correction Action Plan. WASO program staff expressed frustration that internal funding reductions and late allocations have disrupted the contractor's work to this end. Changing requirements have resulted in additional delays. WASO staff projected that conversion to a web-based ASMIS system will be complete and operational in mid FY2009, which will allow all users to query the system to access data from all parks.

As one park archeologist observed, "ASMIS lacks an easy, standardized, user-friendly way to input what for most sites is the single most important data element: the GPS location, so that we can find the site on our next visit. As a result, every park has to invent its own system for inputting and integrating GPS data into ASMIS. WASO is missing a huge opportunity to tap the minds of highly motivated field staff to help solve this problem." WASO program staff agreed on the need for consistent integration of GPS data into ASMIS and indicated that this problem will be solved in converting ASMIS to an online system.

Requests for Stronger WASO leadership

A regional archeologist noted, "Archeologists from across the service used to meet in person twice a year to compare notes on what's working and not. The last time the full group met was three years ago. WASO needs to bring us together at least once a year to grapple with the significant challenges facing the NPS archeology program. Bimonthly phone calls are a poor substitute for meeting face-to-face." WASO program staff acknowledged the benefit of face-to-face meetings but pointed out limitations in travel funds and WASO staff resources available to support such meetings. The bi-monthly conference calls are intended to meet these needs to the extent possible.

Example of Archeological Resources at Risk

Colonial National Historical Park (Virginia)

Colonial National Historical Park contains a wealth of archeological resources, including Jamestown Island, site of the first permanent English settlement in North America; Yorktown Battlefield, scene of the culminating battle of the American Revolution in 1781; and Cape Henry Memorial. Other important sites in this Park predate and post-date the Colonial period. The park contains 177 recorded archeological sites, of which 123 are listed, determined eligible, or recommended eligible for the National Register. Beginning in the 1930s, J.C. Harrington, who is known as the father of historical archeology, directed study of the Jamestown site. Since then, NPS archeologists have continued archeological studies in partnership with other organizations. Since 1994, the Association for the Preservation of Virginia Antiquities has been actively working, in partnership with the park, to excavate the portion of the site that it owns.

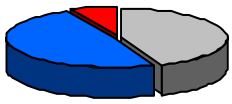
After the recent transfer of the park's only archeologist, park management decided not to fill this position due to budget pressures, relying instead on archeologists from the regional office. The only archeologist in the regional office who has first-hand experience with sites in the park is responsible for the region's entire archeology program in 76 parks. Because there are so few regional office archeologists, contractors and cooperators perform most archeological work. Without a park archeologist on staff, Colonial National Historical Park will need to request assistance from the regional office, wait its turn for contracting support, and rely on regional office archeologists to write the scopes-of-work and then monitor the work performed by the contractors and cooperators. As a result, NPS management of the nationally significant resources in this park has been significantly diminished.

CULTURAL LANDSCAPES

Resource Base

NPS projects a universe of approximately 2200 cultural landscapes in the National Park System. At the end of FY 2007, there were 401 complete, accurate, and reliable landscape records included in the Cultural Landscapes Inventory (CLI). A cultural landscape is a geographic area, including both cultural and natural resources and the wildlife or domestic animals associated with a historic event, activity or person or exhibiting other cultural or aesthetic values. Examples include farmsteads, battlefields, national cemeteries and urban streetscapes.

Figure 1
Cultural Landscapes Condition



Good 47.6 %

Fair 46.1 %

Poor 6.2 %

At the end of FY2007, 47.6 percent of park cultural landscapes on the CLI were in good condition, 46.1 percent in fair condition, and 6.2 percent were in poor condition. Currently, FMSS estimates that deferred maintenance involving cultural landscapes amounts to $159 million. The Maintained Landscapes Component of FMSS is just being finalized and will be implemented throughout the National Park System starting in FY2009.

Cultural Landscapes Program

The Cultural Landscapes Program is a service-wide effort of people in parks, regional offices, centers, and WASO that is dedicated to the mission of preservation and protection of the cultural landscapes in the National Park System. These service-wide efforts are manifested through 1) research to develop an adequate information base for the preservation of these resources, 2) planning to consider the values of these resources prior to assignment of use and determination of treatment, and 3) stewardship to protect these resources for the next generation with no loss of integrity. WASO provides broad leadership, including developing and interpreting policy, providing technical assistance and advice, and developing and maintaining inventories and information systems, including the Cultural Landscapes Inventory (CLI).

The Cultural Landscapes Program is a relatively new program area that has developed during the past 20 years. NPS has been managing significant landscapes since the National Park System was expanded to include historical areas in the 1930s. In 1988, NPS formally recognized landscapes as a cultural resource that required protection and preservation. As a result, starting in 1990, the Park Cultural Landscapes Program was formalized in WASO and the regions to provide direction and demonstrate high quality preservation practice regarding cultural landscapes in the National Park System.

Today, the Cultural Landscapes Program has a total of 32 historical landscape architect positions and 6 horticulturist positions. The WASO Cultural Landscapes Program has 1 FTE on board (a GS-15 Program Manager and GS-13 Historian divide their time between the Cultural Landscapes

and Historic Structures Programs). WASO leadership reported that an historical landscape architect position, which has been vacant for the past two years, will be advertised in FY2009.

Regions fund inventory, monitoring, and stabilization projects proposed by parks through the Project Management Information System (PMIS). Cultural landscapes are inspected every five years; the assessment of condition is approved by the superintendent and regional staff; and the results are entered in the CLI database.

Prioritizing Treatment

Through the process of including a cultural landscape in the CLI, park superintendents agree to a management category based on the landscape's significance, use, condition, and location. The following categories reflect a compilation of legislative mandates, policy considerations, and planning. The cultural landscapes program has detailed criteria for selecting Management Categories, which parallel those for historic structures, which are provided in Appendix M.

Category A—Landscapes that must be preserved and maintained
Category B—Landscapes that should be preserved and maintained
Category C—Landscapes that may be preserved and maintained
Category D—Landscapes that may be or have been disposed of; altered for some other management purposes; or destroyed by natural forces or by accident.

Table 4 shows the number of landscapes on the CLI by Management Category and condition at the end of FY2007.

Table 4
Number of Cultural Landscapes by Management Category and Condition

Management Category/Condition	A	B	C	D	Total
Good	111	76	7	0	194
Fair	96	74	13	0	183
Poor	16	7	1	0	24
Total	223	157	21	0	401

Cultural Landscapes Goals and Measures

Landscape Condition

The percentage of cultural landscapes in good condition (both physical and historical integrity) is both a GPRA and PART measure. At the end of FY2007, 47.6 percent of cultural landscapes were considered in good condition. The target for FY2012 is 50.0 percent.

Regions complete CLI entries that are approved and concurred in by both the park superintendent and the respective state historic preservation officer as appropriate. Condition is reassessed every five years.

> *Good Condition.* A landscape listed on or eligible for listing on the National Register of Historic Places is in *good* condition when the landscape possesses integrity of location, design, setting, materials, workmanship, feeling, and association to the historically significant period(s) based on the National Register Criteria for Evaluation (36 CFR 60.4) and the landscape shows no clear evidence of major negative disturbance and deterioration by natural and/or human forces. Good condition means that the landscape's cultural and natural values are as well preserved as can be expected under the given environmental conditions and no immediate corrective action is required to maintain its current condition.
>
> *Fair Condition.* A landscape is in *fair* condition when the landscape shows clear evidence of only minor negative disturbance and deterioration by natural and/or human forces, and some degree of corrective action is required within 3-5 years to prevent further harm to its cultural and natural values.
>
> *Poor Condition.* A landscape is in *poor* condition when the landscape shows clear evidence of major negative disturbance and rapid deterioration by natural and/or human forces, and immediate corrective action is required to preserve the remaining cultural and natural values.

Documentation

The Cultural Landscapes Program also has one WASO-reported NPS goal: *the percentage of cultural landscapes on the CLI (above the FY2006 baseline) that have complete, accurate, and reliable information.* At the end of FY2007, 19.7 percent of NPS cultural landscapes had such documentation; the target for FY2012 is 82.4 percent. (WASO staff indicated that this improvement is achievable because this measure is based on the FY2006 baseline.) The number of cultural landscapes with complete, accurate, and reliable records is a WASO-reported NPS goal but not a PART measure.

Performance-Based Allocation

The WASO Cultural Landscapes Program administers $1.25 million for CLI implementation and monitoring and expects each region to complete at least six cultural landscape records per year. Beginning in FY2006, WASO implemented performance-based allocation of CLI funding that is based 50 percent on timely and accurate reporting and 50 percent on accomplishments (i.e., the number of complete, accurate, and reliable records generated within the fiscal year).

Feedback from Interviews

NPS staff interviewed noted that park staff generally do not have the time or skills to complete cultural landscape inventories, so most parks rely primarily on staff from regional offices or

centers. In other cases, parks turn to local universities, the Denver Service Center, or architectural and engineering firms to conduct cultural landscape inventories.

Most NPS staff indicated that the current goal for each region to complete six cultural landscape inventories per year is ambitious but achievable. One park resource manager volunteered, "We live in fear that the goal for cultural landscapes will be increased, since we can barely manage six with current funding." Some park cultural resource managers stressed the importance of leveraging resources from other programs to pay for cultural landscape inventories (e.g., funding landscape inventories and listings in the course of planning construction projects, such as road widening or relocation projects).

Some regions place high value on cultural landscape inventories, committing regional discretionary funds to complete additional inventories each year. One region places great importance on the need for cultural landscape inventories to inform their planning and selects landscapes to be included in the CLI to provide a baseline and foundation for parks that are updating General Management Plans.

One NPS veteran recommended shifting both the Cultural Landscapes and Historic Structures Programs to the WASO Park Planning, Facilities, and Lands Directorate in order to establish a closer linkage with those who actually perform the restoration and maintenance work on these resources. One external expert suggested that NPS staff's lack of sensitivity to cultural differences hampers effective handling of sacred landscapes.

Several cultural resources staff from both regional offices and parks expressed concern about WASO program staff's ability to provide technical assistance and help resolve controversial situations. WASO program staff acknowledged that its capacity to provide assistance to the field has been reduced since this program's landscape architect position became vacant in September 2005. WASO staff expressed concern over the future leadership of both the cultural landscapes and historic structures programs when the current program manager retires. WASO leadership indicated that the vacant landscape architect position will be advertised in FY2009.

Example of Cultural Landscapes at Risk

Vanderbilt Mansion Cultural Landscape (New York)

The cultural landscape at Vanderbilt Mansion National Historic Site is noted for its remarkable setting and rich historical association. Over a period of more than 200 years, members of five families, working with several noted landscape architects, contributed to the development of the estate grounds. The cultural landscape is characterized by carefully created patterns of centuries-old tree plantings, picturesque scenery, stunning Hudson River and Catskill Mountain views, and highly crafted Italianate gardens.

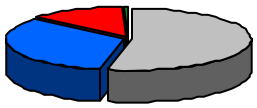
Contemporary studies, including the Cultural Landscape Report prepared by the Olmsted Center for Landscape Preservation, identify critical resource protection, repair and stabilization needs, including: stabilizing and rebuilding failing retaining walls; conserving and repairing deteriorated ornamental fountains and sculpture; clearing overgrown views and vistas; and, pruning and replanting declining trees. NPS estimates that $1.7 million is needed to initiate cultural landscape stabilization at this park. However, lack of funding and staff has limited NPS capacity to maintain and preserve the landscape. If these problems are not addressed, the Vanderbilt landscape will continue to deteriorate, resulting in further loss of original historic features, diminished educational and interpretive value, and higher cost of future repair.

HISTORIC STRUCTURES

Resource Base

The national parks contain 26,898 historic and prehistoric structures. As of the end of FY2007, 21,512 of these had complete, accurate and reliable records on the List of Classified Structures (LCS). A historic or prehistoric structure is a constructed work, usually immovable by nature or design, that was consciously created to serve some human activity. Examples include: buildings and monuments, dams, millraces and canals, stockades and fences, defensive works, temple mounds and kivas, and outdoor sculpture. Of the total universe of historic and prehistoric structures, about 10,000 or 37 percent, are historic buildings. Historic buildings make up about half of all buildings in national parks.

Figure 2
Historic and Prehistoric



Good 53.5%

Fair 33.1%

Poor 13.0%

Unknown 0.4%

At the end of FY2007, 53.5 percent of park historic structures were considered in good condition, 33.1 percent in fair condition, and 13.0 percent in poor condition. The condition of 0.4 percent was unknown.

Good Condition. A structure listed in or eligible for listing on the National Register of Historic Places is in *good* condition when the structure possesses integrity of location, design, setting, materials, workmanship, feeling, and association to the historically significant period(s) based on National Register Criteria for Evaluation (36 CFR 60.4); the structure and important features are intact, structurally sound and performing their intended purpose; and the structure and significant features need no repair or rehabilitation except for routine or preventive maintenance.

Fair Condition. A structure is in *fair* condition when either there are early signs of wear, failure, or deterioration throughout the structure, but its features are generally structurally sound and performing their intended purpose; or there is failure of a significant feature of the structure.

Poor Condition. A structure is in *poor* condition when any of the following conditions is present: a) significant features are no longer performing their intended purpose; b) significant features are missing; c) deterioration or damage affects more than 25 percent of the structure; or d) the structure or significant features show signs of imminent failure or breakdown.

Historic Structures Program

The Historic Structures Program is a service-wide effort of people dedicated to the mission of preservation and protection in parks, regional offices, centers and WASO. There are 45 historical architect and 10 architectural conservator positions dedicated to the Historic Structures Program service-wide. About half of these are term or contract positions. The WASO historic structures program has 1 FTE on board (a GS-15 Program Manager and GS-13 Historian divide their time between the Historic Structures and Cultural Landscapes Programs). In addition, an historical architect position, which has been vacant for several years, is being advertised.

The WASO Historic Structures Program administers two small, dedicated funding programs for historic structures:

- $1.0 million for historic structures inventory and monitoring, which is allocated to the regions based on prior year accomplishments and proper reporting on project completion
- $1.9 million for historic structures stabilization, for which regional allocations are based on proper reporting on project completion

Regions selectively fund inventory, monitoring, and stabilization projects proposed by parks through the Project Management Information System (PMIS). Structures are inspected every five years. The assessments of condition are approved by the superintendent and regional staff, and the results are entered in the LCS database. As summarized in Appendix G, most funds to restore and preserve historic and prehistoric structures (as well as cultural landscapes, archeological sites, and museum facilities) come from other budget accounts, including: operations and maintenance; cyclic maintenance; cultural cyclic; repair and rehabilitation; line-item construction; and recreation fees.

Prioritizing Treatment

Through the process of entering an historic structure on the LCS, park superintendents agree to a management category for the structure based on its significance, use, condition, and location. The following categories reflect a compilation of legislative mandates, policy considerations, and planning (see Appendix M for detailed selection criteria):

Category A—Structures that must be preserved and maintained
Category B—Structures that should be preserved and maintained
Category C—Structures that may be preserved and maintained
Category D—Structures that may be or have been disposed of; altered for some other management purposes; or destroyed by natural forces or by accident.

Table 5 shows the number of structures on the List of Classified Structures by Management Category and Condition as of June 23, 2008.

Table 5
Number of Historic Structures by Management Category and Condition

Management Category/Condition	A	B	C	D	Total
Good	8,638	4,875	955	56	14,524
Fair	4,207	3,469	1,142	72	8,890
Poor	1,582	1,229	611	64	3,486
Unknown	53	12	32	3	100
Total	14,480	9,585	2,740	195	27,000

It is noteworthy that 2,811 historic structures in Categories A and B are rated in *poor* condition. In many cases, lower priority properties, such as the almost 700 properties in Management Categories C and D that are in *poor* condition, are allowed to decline through benign neglect, according to NPS staff. This reflects tacit admission that maintenance, stabilization, repair and rehab funds are inadequate to preserve these structures.

NPS estimates that the total deferred maintenance backlog for historic and prehistoric structures totals $1.9 billion, which amounts to about 22 percent of the service-wide maintenance backlog of $8.7 billion. With the exception of routine maintenance, all work on historic and prehistoric structures is funded as a "project," which is managed through the Facility Management Software System (FMSS).

Historic Structures Goals and Measures

Three PART measures apply to the Park Historic Structures Program, one of which is also a GPRA measure:

> *Percent of historic and prehistoric structures on the LCS in good condition* (both physical condition and integrity), which is also a GPRA goal. 53.4 percent of structures were in *good* condition at the end of FY2007. The target for FY2012 is 56.0 percent.
>
> *Percent of historic and prehistoric structures on the LCS that have complete, accurate, and reliable inventory information.* 80 percent of structures had such documentation at the end of FY2007; the target for FY2012 is 100 percent.
>
> *Condition (physical condition only) of all historic buildings as measured by the Facility Condition Index (FCI).*[24] The average condition for FY2007 was 0.21. The target for FY2012 is 0.21. An FCI rating < 0.10 qualifies as *good condition*; 0.11 – 0.14 is *fair*; 0.15 – 0.49 is *poor*. Therefore, the current situation and target for 2012 means that the average condition of NPS historic structures is, and is expected to remain, well within the *poor* range.

[24] The Facility Condition Index (FCI) is a measure of a facility's relative condition at a particular point in time. The FCI rating is the ratio of the cost of repair of the asset's deficiencies divided by its current replacement value.

Performance-Based Allocation

The WASO Historic Structures Program administers $1.0 million each year for LCS implementation and monitoring and expects each region to update approximately five percent of its existing records annually. Beginning in FY2006, the WASO Historic Structures Program instituted performance-based allocation of LCS funding that is based 50 percent on timely and accurate reporting and 50 percent on accomplishments (i.e., the number of complete, accurate, and reliable historic structure records completed within the fiscal year).

Feedback from Interviews

NPS staff at all levels provided generally positive feedback on the management of the Historic Structures Program, judging the performance measures well aligned with the resource and reporting a close working relationship with facilities staff who actually perform the maintenance and restoration work on historic structures. Several NPS staff pointed out the backlog of deferred maintenance on historic structures (estimated at $1.9 billion) highlights the need for additional resources for maintenance, repair, and rehabilitation. NPS staff also reported a number of specific problems related to the Historic Structures Program.

Several staff in one region reported that when the region missed a WASO-reported NPS goal, causing WASO to miss its goal, preoccupation with improving performance in relation to this goal diverted attention and resources from other priorities over the next year to the ultimate detriment of the resource.

One maintenance manager described the reduction in park maintenance staff due to contracting out as a terrible loss and serious threat to historic buildings. "We lost the individual understanding of historic buildings, the personal investment, the continuity. Now we are in a constant retraining mode—every five years, we get a new contractor with a fresh crew and we start all over. As a direct result, the resource is suffering." Several regional office staff expressed concern about the Denver Service Center's shift from doing historic structure reports themselves to contracting them out. Park staff expressed concern that some architectural and engineering firms doing historic structure reports lacked sensitivity to historic structures.

Many park staff described FMSS as a time-consuming, user-unfriendly system that does not accommodate the special needs of historic structures, as typified by the comments of one maintenance manager: "FMSS is a great idea, but it has suffered from lack of staff capacity, training, and support." The NPS FY2009 budget proposes a service-wide initiative to add 80 FTE to improve support for FMSS.

Several park staff noted inefficiency in having to reenter the same or similar data twice in both FMSS and PMIS. WASO staff reported that NPS is developing a "bridge" between the two systems to eliminate this problem, which will be implemented in the fall of 2008.

All NPS staff who addressed the subject of cost estimating pointed out that FMSS estimating software does not work well for historic structures, because its calculations are based on modern, standard construction specifications. According to one maintenance manager: "The only way to

get FMSS to include a reasonable figure for historic structure rehabilitation and repair work is to "over-spec" or use a multiplier." The WASO Park Facilities Management Division plans to build a supporting database in FMSS of cost estimates specific to historic structures for common repair projects, but this will not be available for several years.

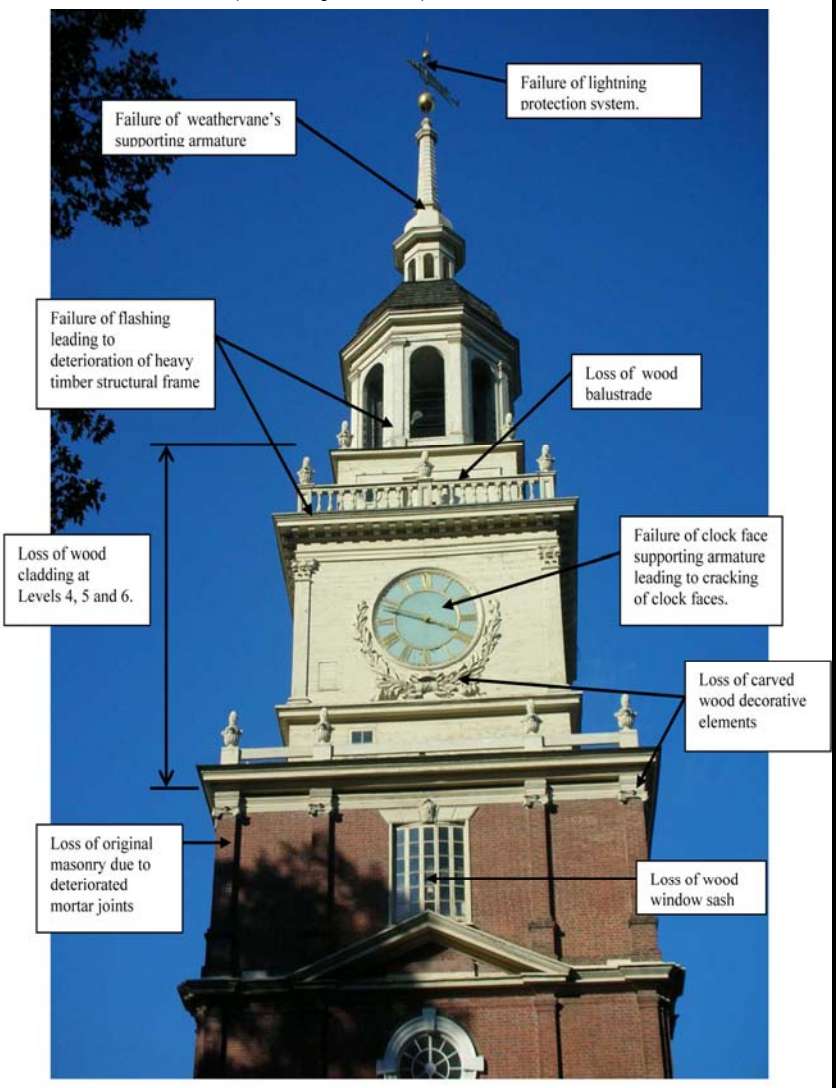
WASO staff reported that regional office and park staffs continue to struggle to resolve significant data discrepancies between the universes of historic structures listed in LCS and FMSS. Although the universes of historic structures in these two systems should be identical, NPS staff reported less than 50 percent coincidence between LCS and FMSS due to data entry and coding problems. Several regional office staff acknowledged the problem and reported that they are urging park staff to update the coding of historic structures within FMSS.

More than a dozen park and regional office staff expressed concern about the limited capacity of WASO staff to respond to questions, provide technical assistance, and help resolve controversial situations. WASO program staff acknowledged that capacity has been reduced since the historical architect position became vacant in 2001 and expressed concern about continuity when the program manager retires. NPS is now recruiting an historical architect to fill the longstanding vacancy.

Example of Historic Structures at Risk

Independence Hall Tower (Pennsylvania)

Constructed in 1828, Independence Hall Tower is one of America's earliest examples of colonial revival architecture and is a critical element of the Independence Hall World Heritage site. The current tower replaced an earlier wood steeple that was constructed between 1750 and 1754 and removed in 1781 because of lack of maintenance. Although major maintenance is needed on a ten-year cycle to preserve the tower, the last major work occurred in 1993. The tower is experiencing major structural deterioration due to moisture-fed fungal infestation. Upper level wood cladding pinned together with iron rods is suffering deterioration due to moisture infiltration. A study is underway to determine the extent of the rusting of the rods and their ability to provide structural support. Decorative wood trim elements have fallen occasionally onto Independence Square's south side adjacent to the building's main entrance. Structural supports for the tower's bicentennial bell's striking hammer are failing, permitting the hammer to rest on the bell.



Needed work includes: installing scaffolding; providing metal flashings; painting and caulking exposed wood trim and cladding; replacing wood shingle roofing; refurbishing historic decorative elements; restoring wood frames, doors, and window sashes; providing structural repairs and arresting wood deterioration (replacing elements where necessary); bracing clock faces; repointing masonry; and installing structural supports for the bicentennial bell. NPS has budgeted $2.5 million of the estimated $3.7 million cost of this work in FY 2011. Until this work is done, structural deterioration will continue, resulting in increased loss of historic fabric and requiring increasingly expensive repairs.

PARK HISTORY

The NPS History Office was established in 1931 and since that time has conducted research on national parks, national historic landmarks, park planning and special history studies, oral histories, and interpretive and management plans. The mission of the History Program is to provide advice in the evaluation of proposed new national parks, and to support the WASO Cultural Resources Directorate, parks, and regional offices in all matters relating to the history and mission of the National Park Service.

Since many parks were created to commemorate pivotal events, groups and individuals in American history, the direction and advice the history program provide are critical to telling their stories. The Park History Program assists both individual parks and groups of parks with similar themes—such as Civil War battlefields, World War II parks, and parks related to the Westward Movement. The Park History Program routinely responds to questions regarding the wide and varied historic resources included in the National Park System, and is responsible for providing a wide range of publications, studies and documents in print and electronically.

Park History Program

The WASO Park History Program has 2.0 FTE on board plus 1.0 FTE for the Congressionally mandated Maritime History Program. In addition, two other historian positions are being advertised. Nationally, the Park History Program has 158 FTEs, of which 110 (70 percent) are eligible to retire in the next five years.

Historic Resource Studies

An *historic resource study* provides a historical overview of a park or region and identifies and evaluates a park's cultural resources within historic contexts. A historic resource study employs both documentary research and field investigations to determine and describe the integrity, authenticity, associative values, and significance of resources in the park. It synthesizes all available cultural resource information from all disciplines in a narrative designed to serve managers, planners, interpreters, cultural resource specialists, and interested public, as a reference for the history of the region and the resources within a park.

For a new park, the historic resource study is often a critical piece of the park's General Management Plan. For more established parks, the historic resource study can be used to analyze an important topic that was not included in the interpretive program in the past, such as how the institution of slavery relates to a Civil War battlefield. In addition, historic resource studies can include preparation of National Register nominations for all qualifying resources and provide a foundation for completing the Cultural Landscapes Inventory and the List of Classified Structures.

Historic resource studies identify the need for special history studies, cultural landscape reports, and other detailed studies. They may also make recommendations for resource management and interpretation. Although historic resource studies are interdisciplinary in character, the principal investigator is usually a historian. Typically, a single historic resource study is developed for

each park or some aspect of a park, although in some cases (e.g., coastal fortifications) a single study may cover multiple parks. More than 1,000 historic resource studies have been completed, but some are decades old.

Park Administrative Histories

A *park administrative history* provides a history of the preservation and management of the park, which gives superintendents and resource managers an understanding of the basis of earlier decisions. Administrative histories relate to how particular parks and functions originated and evolved. In this context, "administrative history" is used broadly to cover efforts leading to park establishment, legislative background, and other contributing developments beyond administration in the strict sense. Although many parks' administrative histories are of wider interest, their primary audience is NPS personnel. Approximately 150 parks have completed administrative histories, but some are more than 20 years old.

Park History Goals and Measures

There are no GPRA or PART goals for the park history program in FY2008. An earlier GPRA goal, which was dropped in 2006, required that a park complete both an administrative history and a historic resource study.

Performance-Based Allocation

The WASO Park History Program administers approximately $800,000 annually for historic resource studies. These funds are allocated to the regions in equal amounts, taking into account proper reporting on accomplishments of the prior year's projects. No funds are dedicated for administrative histories.

Feedback from Interviews

Several park superintendents highlighted the value of administrative histories, especially in giving newly appointed superintendents important background and context.

Several regional historians reported that interest in administrative histories and historic resource studies has waned since the GPRA goal for park history was dropped. WASO staff reported that since the GPRA goal was dropped, updating General Management Plans is the primary impetus for administrative histories and historic resource studies. One regional historian recommended that parks conduct a new kind of low-cost ($6,000 - $15,000) scoping study to assess historical research needs and set priorities.

WASO program staff reported that the earlier GPRA goal's requirement that a park complete *both* an administrative history and a historic resource study had resulted in a minority of parks achieving this goal. WASO staff therefore urged reinstating administrative histories and historic resource studies as separate measures.

Others pointed out that while historic resource studies and administrative histories are important and urgently needed by every park, counting these tangible work products is a poor measure of

outcomes for historians. They emphasized that the ultimate goal is *understanding* historical context—by superintendents, resource managers, interpretation staff, researchers, and park visitors. At the same time, they acknowledged the difficulty in finding reliable and convenient metrics for this purpose.

Several historians offered high praise for both the quality and accessibility of the *CRM Journal* and website, which are managed by the Historical Documentation Programs within NPS and address both park cultural resources and the national historic preservation program.

Example of Park Histories at Risk

Perspective on Reconstruction

In many ways, the era of Reconstruction is one of the most important stories in American history. Just as importantly, the historiography of Reconstruction has changed significantly over time. In the early twentieth century Reconstruction was regarded as a tragedy that unjustly punished the South after the Civil War. In the 1960s, the interpretation changed dramatically as Reconstruction became recognized as a progressive program that educated and provided hope to many capable and talented African American politicians.

Reconstruction's importance to American history is not as well reflected in our national parks as many other historical themes. None of our parks focuses primarily on the theme of Reconstruction, and only one park – Nicodemus National Historical Site – focuses on African American families who left the South during this period to find new homes in Kansas. The Andrew Johnson National Historical Site, which honors our 17th President, wrestles with Johnson and his role in the Reconstruction story, but presents almost exclusively the early interpretations that Reconstruction was a tragedy. Other parks, such as Fort Pulaski in Savannah Harbor, Fort Sumter, in Charleston Harbor, and several other parks deal with Reconstruction only tangentially. By not providing a more comprehensive and balanced interpretation of Reconstruction, NPS is missing an important opportunity to contribute to real understanding of this important period of our history for all Americans.

MUSEUM MANAGEMENT

Resource Base

Second in size only to the Smithsonian Institution, NPS museum collections hold more than 123 million items—objects, artifacts, specimens, and archives. Archives make up the biggest share of the collection (68 percent), followed by archeological artifacts (27 percent). Only about 350,000 items, or less than one-half percent, are actually displayed on exhibit. The vast majority of items are kept at 691 museum storage facilities in 295 parks. In addition, universities and other non-federal organizations store items on loan from NPS, including natural history collections.

While some items come from external donors and collections that convey upon designation of national park status, the lion's share of the NPS archival collection consists of "resource management records" generated by the parks themselves. These records provide background and documentation of steps taken to restore, protect and preserve cultural and natural resources in order to inform future resource management decisions.

Museum Management Program

With 7 FTE on board, the WASO Museum Management Program provides overall program direction and support including: designing and maintaining the Automated National Catalog System Plus (ANCS+), awarding categorical grants to the regions, developing training courses, providing technical assistance, responding to Freedom of Information Act requests, and tracking regions' performance as part of the PART-mandated reporting and performance-based allocation of SAIP funds.

Regional museum programs coordinate various functions, which in some cases include providing training and storing museum collections in regional centers. Four regional museum centers (in Boston, Landover, Tallahassee, and Lincoln) provide cataloging and other technical assistance and store about 20 percent of the entire NPS collection.

The park superintendent is the accountable officer responsible for approving all museum accessions, loans, and deaccessions. Every park that holds a collection is supposed to have a museum management plan, including a scope of collection statement intended to ensure that items accessioned are germane to the park's mission. The vast majority of parks that hold collections do not have a dedicated museum curator; instead, other staff manage the collection as a collateral duty. Staff from parks and regional centers catalog items by entering data into ANCS+. Because ANCS+ has a decentralized structure, regional staff cannot access park information directly. Because of lack of familiarity with ANCS+, some park staff rely primarily on customized Excel spreadsheets instead of using ANCS+.

At the request of Congress, NPS completed a museum facility storage plan in 2007 that provides a long range plan for consolidating collections in 254 storage facilities in 162 parks. In addition to reducing facility costs and improving the condition of facilities, the proposed consolidation will increase the share of NPS collections that are under the care of a trained curator or archivist.

Implementation of this plan—including securing funding to construct facilities and relocate collections—will take many years. However, progress can be made in the near term through improvements to existing facilities, relocations of collections, and the development of operating protocols and procedures for multi-park facilities.

The Backlog Challenge

During the 1970s and most of the 1980s, park collections grew slowly and steadily but attention to cataloging, the critical step in asset management, languished. In some cases, when parks "cataloged" both objects and archives, the methods used were so vague and inconsistent as to make their retrieval difficult. Since the crisis in collections first drew Congressional attention in 1988, NPS annual budgets have continuously included funds to accelerate cataloging and to improve the condition of museum facilities. However, reducing the backlog has been an elusive goal. While NPS has cataloged some 38 million items since 1996, the number of new items accessioned has far exceeded the pace of cataloging, with the result that the backlog has *increased* by more than 15 million items over this period. The past three years have seen progress in the percentage of collections cataloged, and FY2007 marked the first year in which the backlog dropped significantly (by 3.8 million items).

Currently, about 68 million items or 55 percent of the total collection has been cataloged, with basic information recorded for retrieval. The remaining 56 million items constitute the uncataloged backlog, which lack basic accountability documentation or means of retrieval. (NPS uses an equivalency factor of 1,600 archival items per linear foot in order to calculate a combined estimate of both archival records and objects in estimating the backlog.) In addition, many parks have extensive archival records that have not yet been surveyed, and some parks have large collections waiting to be accessioned.

Goals and Measures for the Museum Management Program

Three GPRA/PART measures apply to the park museum management program.

Condition of Facilities

Although the condition of the objects themselves is recorded on individual catalog cards, the size of the collections has prompted NPS to use the condition of museum facilities as the proxy for the condition of items in the collection.[25] NPS has established preservation and protection standards for collection facilities, on which parks self-report through the Automated Checklist Program. The *percent of preservation and protection standards met at museum facilities* is both a GPRA goal and PART measure. In 2007, the service-wide level of attainment of preservation and protection standards was 73.9 percent; the target for 2012 is 78.9 percent.

NPS staff had mixed reactions to the Automated Checklist Program. Some felt that relying on the condition of the facility is a reasonable proxy for the condition of the items in the collection, while others disagreed. Several park museum staff who criticized the checklist's equal

[25] The physical condition of museum structures is determined through the comprehensive condition assessment program, which records the results as work orders in FMSS that specify the scope and cost of the needed repairs.

weighting of all factors, suggested reducing the checklist to 12-15 of the most significant factors and reworking the remainder as a best practices guide. Two staff pointed out that the Checklist was initially developed to outline *ideal* conditions for museums, and that its adoption as a yardstick for performance is inappropriate. One museum manager noted that the implicit goal of reaching compliance with all factors is unrealistic, because some museums, such as those housed in the basements of historic houses, have inherent limitations that make full compliance impossible or unreasonably expensive. Consolidating multiple museums into one, as proposed by the Park Museum Collections Storage Plan, will address some of these situations.

Objects Cataloged

The WASO-reported NPS goal is to catalog 5 percent of the backlog each year. Because this goal ignores the historic problem of new accessions exceeding the rate of cataloging, NPS changed the PART measure for FY2006 to focus on progress in cataloging the overall collection: *the percent of museum objects cataloged and submitted to the National Catalog*, with a target of 2.5 percent per year. Progress on the PART measure can be achieved by accelerating cataloging, reducing previous backlog estimates, controlling accessioning, or deaccessioning items. In 2007, 54.3 percent of the entire NPS museum collection had been cataloged; the 2012 Target is 66.8 percent.

WASO staff emphasized that the new PART cataloging measure corrects the perverse incentive for parks to overstate backlog to receive greater need-based funding allocations. They reported that "phantom inventories" are now disappearing in response to the new PART measure.

Average Cost of Cataloging

WASO calculates the average cost to catalog a museum object as a PART measure based on the quotient of the amount of backlog cataloging funding and the number of items cataloged. The actual cost of cataloging was $0.81 in FY2007; the target for 2012 remains constant at $0.81.

NPS staff and external experts interviewed unanimously agreed that the average cost per item cataloged is not a useful performance measure for park museums. On the other hand, most felt it is useful to track this statistic, but only as a general "yardstick" to help parks compare their experience with other parks. Several noted that it is unlikely that NPS will be able to maintain the current $0.81 average cost per item catalog. One museum expert suggested that calculating a median range of costs would be more helpful than a point estimate. Finally, several NPS staff pointed out that the inherent differences in cataloging archives and museum objects makes calculating a combined average cost illogical.

Performance-Based Allocation

WASO Museum Management Program administers two dedicated sources of funds for museums: approximately $3.2 million for backlog cataloging, and $2.8 million to improve the condition of museum facilities. These funds are allocated to the regions by a formula based on need, which is "re-baselined" every five years. Based on region-wide year-end results, WASO redistributes funds for the following year by penalizing regions that underperformed and

rewarding regions that met or exceeded their goals. In FY2007, one region was penalized 50 percent of its allocation (or about $273,000) for missing its cataloging target, due to inadequate progress in cataloging and one park accessioning a new collection of 800,000 items.

Feedback from Interviews

Sound Policies but Problems with Execution

Interviews with NPS staff and outside experts consistently found that the park museum management program has sound policies, procedures, and standards in place. The three-volume Museum Handbook sets forth clear policies for park collections, including the requirement for parks to have a current museum collections plan and a sound scope of collections statement. The problem is spotty execution of these policies in the field for a variety of reasons.

Many NPS museum staff indicated that the magnitude of the backlog problem is greater than recognized considering that many parks have extensive stores of archival records yet to be surveyed, that several parks have large collections waiting to be accessioned, and that some cataloging from decades past was inadequate. WASO staff shared this assessment.

Reactions to the backlog problem differed significantly among NPS staff interviewed, based in part on the relative importance they placed on the "preserve and protect" aspect of the NPS mission versus ensuring "access and use." All external experts, WASO staff, and some field staff consider the size of the backlog "shocking" and "deeply troubling" because the inaccessibility of uncataloged items makes them all but useless. These interviewees placed great value on the need to expand access to NPS collections, which two described as "the country's best kept secret." In contrast, a minority of museum staff placed lesser importance on access and use and emphasized the value of "saving things for posterity," even if they go uncataloged for decades. Discouraged by working in vain to reduce the backlog for more than a decade, these NPS staff seem resigned to the inevitable reality of slow progress, at best, in eliminating the backlog.

Regardless of their assessment of the backlog, NPS staff at all levels expressed full agreement about the central challenge facing the NPS Museum Management Program. One regional office program manager captured the sentiment of many: "We are drowning in archives." NPS staff agreed that the causes of the backlog problem are multidimensional, as outlined below.

Uncataloged Field Collections

Since 1991 NPS policy has required field collections produced by in-house and contracted studies to be properly labeled, cataloged, stored in museum facilities, and documented in ANCS+. But WASO and regional office staff report that these requirements for documentation and cataloging are often ignored due to inattention or funding shortfalls. For example, a regional cultural resource manager reported that a collection of 700,000 fish larvae added significantly to the backlog in three parks. As a result, some natural and cultural resource inventory and monitoring projects end up adding to the backlog instead of generating cataloged items, as NPS policy requires.

Poor Records Management

Museum collections are supposed to retain archives that relate to managing park resources but not administrative records. NPS staff at all levels report that weaknesses in parks' records management – and a failure to follow Director's Order #19 – result in some records unrelated to resource management inappropriately being sent to museums. Accessioning an item creates a legal duty for NPS to retain it permanently. Although Congress gave NPS deaccessioning authority in 1998, deaccessioning is rare and the process is purposefully complex.

Lack of Qualified Staff

NPS staff at all levels, as well as outside experts, identified the lack of qualified staff as a root cause of multiple problems facing the Museum Management Program. Although NPS professional standards call for a GS-11 grade level for independent work with museum collections, fewer than 100 of the 295 parks with museum collections have a curator at this grade level. In fact, WASO staff reported that non-museum staff manage the majority of park museum collections as a collateral duty and that many have never received hands-on training, primarily due to the lack of travel funds. Interviews with NPS staff indicate that the lack of qualified staff has resulted in mistakes in accessioning, cataloging, and caring for collections.

- "Collateral duty curatorial staff don't have expertise or time to make informed decisions about accessions."
- "We have learned the hard way—the very hard way—the problems that result from relying on collateral duty staff to run museums."
- "Many superintendents lack appreciation of the import of the decision to accession. Decisions by GS-5s end up creating a permanent legal duty for NPS."

Failure to Follow Professional Archival Standards

Archives are the central challenge facing the NPS Museum Management Program. Indeed, archives accounted for 94 percent of the objects/items accessioned in FY2007. However, many NPS staff trained in museum curation reportedly fail to appreciate important distinctions between museum curation and archiving and the need for a different approach to cataloging archives. Given the current mix of specialties, it is not surprising that many NPS staff "bring a curatorial mindset to archiving" (in the words of one museum manager): of the 159 NPS employees in the museum job series, only 27 are trained archivists and 20 are archives technicians.

The NPS Senior Archivist, an expert with the National Archives and Records Administration, and NPS staff in several museums emphasized the need to change the prevailing approach to archiving to be consistent with professional archival standards. For example, they consider inefficient and counterproductive the longstanding practice that some museums have followed to catalog archives at an "item level" and treat every project as an independent "collection" with its own finding aid.[26] Instead, they recommend following the more broadly accepted hierarchial

[26] A finding aid is a guide that archivists develop to describe a collection.

approach in which similar records are organized and linked under a single collection to maintain their "archival bond." These professionals believe this approach will accelerate the archiving process as well as facilitate easier retrieval of records.

Other NPS museum staff countered that the special nature of NPS projects requires their traditional approach to cataloging archives, which they maintain is consistent with national standards. Outside experts questioned this assertion, pointing to recent publications by the Society of American Archivists as evidence that the field of archiving is changing in response to dramatic growth in volume and in recognition of the benefit to researchers of standardized, hierarchical approaches. In July 2008, the Associate Director for Cultural Resources proposed revisions to Appendix D of the Museum Handbook to reinforce the need to follow professional archival standards. At the same time, several WASO staff expressed concern about how readily museum curators will put the revisions to Appendix D into practice after their formal adoption.

In emphasizing the need for different approaches to cataloging archives and objects, several NPS staff and outside reviewers recommended that NPS stop using the "1,600 archives per linear foot" conversion factor, which allows consolidated estimates of the cataloging backlog. They recommended that NPS separately track objects and archives, using the more widely accepted measures of "linear foot" or "cubic foot" for archives.

Difficulty Holding Parks Accountable

While WASO holds the regional offices accountable through its performance-based allocation process, several regional office staff reported that they have little control over the parks because each superintendent is the museum's "accountable officer." For example, a regional museum program manager reported that more than one-third of parks ignored the mid-year call for work plans on accessioning and cataloging, which left the region "hoping for the best." Of course, superintendents are accountable to Regional Directors through their performance evaluations, but NPS staff pointed out that measures for museum collections are not routinely included, and neither superintendents nor regional administrators generally consider museums a high priority. WASO staff acknowledged the difficulty regions face in holding parks accountable and expressed hope that funding penalties imposed through its performance-based budget allocation process will have the result of strengthening parks' accountability to their regional offices.

Reactions to Performance-Based Allocation

Several park and regional museum program staff expressed concern that the PART cataloging measure and WASO administration of performance-based allocation are having a chilling effect on accessioning new items. They noted that "collections are supposed to grow." They also considered that the view of some NPS staff that large accessions are inherently 'bad' to be at odds with NPS statutory responsibilities. Regional museum staff unanimously requested WASO to reduce its earlier agreed upon penalty procedures for regional museum programs that miss performance targets. WASO staff countered that the performance-based allocation process is working to direct the attention of park and regional museum staff to critical issues, as expected by OMB staff.

Examples of Museum Resources at Risk

Yellowstone National Park Museum Collection (Wyoming)

Yellowstone National Park, one of the crown jewels of the national park system, is the only Department of Interior site that is recognized by the National Archives and Records Administration as an affiliated archive. At the end of FY2007, Yellowstone had cataloged less than one percent of the 2,900 linear feet of archives in its collection. In addition, less than half of the cultural objects and natural history specimens in Yellowstone's collection have been cataloged, with a reported backlog of more than 100,000 items in its history, biology, and paleontology collections. Yellowstone has been without an archivist since May 2007. The park also recently lost a museum technician position. There are no plans to fill either position. As a result, Yellowstone's important cultural collections are at risk.

Jamestown Visitors Center Museum (Virginia)

In September 2003, Hurricane Isabel caused five feet of flooding in the basement of the Jamestown Visitor Center of Colonial National Historical Park. The Center holds an internationally significant collection of 17th century colonial artifacts. Since the 1960s, NPS had acknowledged the risk of storing this collection in the basement of a building in a flood plain. Ironically, only days before Hurricane Isabel, the Park and its partner organization, the Association for the Preservation of Virginia Antiquities, had broken ground for a new collections research and storage facility. The brackish water, which flowed through a nearby pitch and tar swamp, saturated ceramics and caused archeological metals to rust. After the collection was removed, each item had to be soaked to remove contamination and carefully dried. The important archive of field notes dating back to the 1930s was freeze-dried, and the large photographic collection re-processed. Quick action by emergency responders resulted in minimal loss to the collection, but all 400 museum cabinets were lost due to rust. Full recovery of the Jamestown collection took four years at a cost of nearly $6 million. The collection is still located on Jamestown Island in a facility jointly managed by NPS and the Association for the Preservation of Virginia Antiquities. These conditions put Jamestown's important artifacts and archives at risk.

Of the 295 parks with museum collections, 91 report a least one museum facility located in a flood plain.

CHAPTER 4

FINDINGS AND RECOMMENDATIONS

This chapter presents the Panel's findings and recommendations for strengthening NPS stewardship of park cultural resources. Based on a review of performance reports and interviews, the Panel believes that cultural resources are at risk throughout our national parks, including cultural resources of significance to the nation and the American people. National data make clear the vulnerability of all categories of park cultural resources that are under review:

- **Archeology**—Only about two percent of park acreage has been surveyed for archeological resources, and less than half of identified sites are in *good* condition.

- **Cultural Landscapes**—Only about 20 percent of cultural landscapes have a completed inventory, and less than half of landscapes listed on the CLI are in *good* condition.

- **Historic Structures**—Deferred maintenance for historic and prehistoric structures exceeds $1.9 billion, and 2,811 (12 percent) of the historic structures that NPS considers nationally significant (Management Categories A and B) are in *poor* condition.

- **History**—More than half the parks reportedly lack an administrative history, and many of these studies are out of date.

- **Museum Collections**—Nearly half of the entire NPS museum collection has not been cataloged, leaving more than 56 million archives, objects, and specimens without basic documentation, intellectual control, or effective means of retrieval.

The Panel's findings and recommendations to strengthen NPS stewardship of park cultural resources are organized in the following categories:

- performance-based management
- park superintendent accountability
- increased flexibility
- national leadership
- funding and staffing
- individual program recommendations

PERFORMANCE-BASED MANAGEMENT

The Panel concludes that NPS performance-based management systems are not working optimally to inform cultural resource management decisions and guide the most effective allocation of resources. This conclusion reflects the consensus of the overwhelming majority of

NPS staff interviewed, including several self-identified advocates of performance measurement. The reasons most frequently cited include the following:

- The budget formulation process is based primarily on park needs, with relatively little weight placed on park performance.
- Accountability rests primarily with the regional offices, while the management of most critical activities to preserve and protect cultural resources occurs in the parks under the direction of park superintendents. Many park staff reported that, as long as the regional offices achieved their cultural resource GPRA goals, little attention is given to individual park performance. Although some regions use the budget process to enforce park accountability, NPS does not have consistent mechanisms for ensuring parks' accountability.
- Current GPRA measures, while being general enough to "roll up" to provide consistency in Department-wide reporting, have limited relevance to the parks. Academy research revealed a broadly shared view that current GPRA measures are a reporting tool only, and do not function adequately as a management tool.
- Many GPRA measures ignore vast differences in park cultural resources' significance, vulnerability, and management costs. Individual program recommendations at the end of this chapter call for NPS to develop five new park level performance measures for use as appropriate in GPRA, PART, and other performance measurement and improvement systems.
- Park staff deliberately "aim low" when setting GPRA goals, to account for uncontrollable factors and to guard against missing a target. There are no incentives to exceed goals; in fact, some GPRA coordinators view exceeding a goal as risking next year's target being raised.

To address the above challenges, the Panel sought to identify ways to factor performance more strongly into budget decisions, increase accountability at the park level, and use performance measures as learning and management tools to inform decision-making at all levels. Over the past three years, NPS has instituted two systems that can be used for these purposes: 1) a performance-based allocation process that adjusts WASO cultural resource project funding allocations to the regions based on parks' prior year reporting and accomplishments of PART measures; and 2) the NPS Scorecard system (based on GPRA, PART, and a variety of other measures) that supports budget formulation, offers a potentially powerful learning and management tool at the park level, and allows park-by-park comparisons.

Performance-Based Funding Allocation

The Panel is encouraged by NPS experience in using PART measures in allocating WASO-administered project funds based on performance. Although only about three percent of the $20 million that WASO administered in FY2007 for cultural resource projects was reallocated among regions based on parks' prior year accomplishments and reporting, this allocation process seems to be directing NPS staff attention to achievement of critical goals. For example, the number of "discrepancies" (i.e., either inadequate reporting on or completion of projects) decreased from ten percent in FY2006 to two percent in FY2007.

Although regional staff agreed in advance to the reallocation ground-rules, regional office staff generally believes the penalties are overly punitive and disruptive. While acknowledging regional staff concerns, WASO staff noted that this performance-based reallocation process is directing attention to critical problems in the field. The Panel recommends that NPS continue its implementation of performance-based funding allocations, as a means to improve program management as well as accountability. The Panel also recommends that NPS cultural resource programs show forbearance in reallocating funds when regions miss goals for justifiable reasons. For example, for the Museum Management Program, the Panel believes that the reallocation process should take into account the impact of new accessions that are within a park's scope of collections.

Recommendation #1: The Panel recommends that WASO cultural resource programs continue the performance-based allocation process for adjusting project funding allocations to the regions as a means to improve program management as well as accountability. WASO needs to insist on timely and accurate reporting, seek early identification of problems, and exercise forbearance in reallocating funds when the regions miss goals for justifiable reasons, using each failure as a learning opportunity.

More Emphasis on Park-Level Performance

The Panel explored ways to increase emphasis on park-level performance, including considering the feasibility of shifting performance-based funding allocations from the regional level to the parks. This approach is conceptually appealing, but its implementation poses several challenges. First, allocating WASO-administered project funds at the park level would increase the number of units whose performance is being judged from seven regions to hundreds of parks (many parks do not receive cultural resource project funds administered by WASO in any given year). Second, since many cultural resource stewardship activities are actually performed by regional offices and center staff, applying performance-based reallocations at the park level could essentially hold parks accountable for work performed by the regions. The Panel believes that expanding the use of the NPS Scorecard offers a more promising approach for directing attention to park level performance and improving the management of park cultural resources.

NPS Scorecard

The Panel commends NPS for developing the NPS Scorecard, with strong input from field staff through the Scorecard Advisory Group, which allows parks' performance and efficiency to be factored into budget decisions at all levels. Prior to Scorecard, NPS based most budget formulation decisions primarily on assessments of parks' needs. According to staff in the NPS Comptroller's office, not all parks and regional staff have begun to use Scorecard in budget formulation, and many park staff are not familiar with its capabilities, because outreach and training in Scorecard's use have been limited. The Panel finds that parks' performance and efficiency deserve greater weight in setting budget priorities at all levels within NPS.

Recommendation #2: The Panel recommends that NPS expand use of the NPS Scorecard as a budget formulation tool, including providing increased outreach, training, and technical assistance to NPS staff at all levels.

The Panel believes that, in addition to Scorecard's utility in budget formulation, this system offers a potentially powerful management tool for park superintendents and resource managers because it makes park-level data readily accessible and allows comparisons among parks. With the support of the Scorecard Advisory Group, NPS opened access to Scorecard's measures in mid-2008 so that staff in any park can view other parks' scores, in addition to tracking changes in their own park. The Panel commends this decision and encourages the NPS Comptroller and the Scorecard Advisory Group to consider four additional opportunities to make full use of Scorecard as a learning tool.

- NPS Scorecard offers a platform for making other "informational" programmatic measures (i.e., factors that are not "scored") easily accessible to superintendents and park staff to provide clues for improving performance. Possible examples include: progress in inventorying park resources; the percent of historic structures in good condition by Management Category; the average cost of cataloging museum items; use of museum collections; and completion of park administrative histories, historic resource studies, and archeological overviews and assessments.

- Although NPS Scorecard allows a park to make comparisons with another park or with the average score for all parks in its region, it does not allow park staff to compare their park's experience with a group of similar parks, such as all battlefield parks. Adding this function would provide even more relevant information to help park staff highlight outlying values and identify best practices.

- Currently, the NPS Scorecard's quadrant system provides relative comparisons of parks' performance and efficiency. The Panel encourages NPS to pursue its plans to develop benchmark standards and highlight best practices.

- More systematic outreach, training, and technical assistance on the NPS Scorecard will increase NPS staff's familiarity with Scorecard's capabilities, both as tool in the budget process and for improving park-level management decisions.

Recommendation #3: The Panel recommends that NPS make full use of the NPS Scorecard as a management tool so that park superintendents and resource managers can track changes over time and make comparisons with similar parks by: adding additional informational measures for cultural resources and other programs; developing the capability to allow comparisons with groups of similar parks; accelerating development of benchmark standards; highlighting exemplary practices; and expanding outreach, training, and technical assistance to NPS staff at all levels.

Electronic Systems Reporting Workload

NPS is directed by statute and DOI policy to maintain inventories of park cultural resources. The rationale for these electronic systems is that the burden of inputting data is offset by reduced workload in responding to subsequent requests for information from various sources. WASO staff indicated that, while not all NPS reporting systems directly support the management of cultural resources by park staff, these electronic systems help regions and WASO manage the overall system and help WASO justify funding requests to OMB and Congress.

Although this study did not include an analysis of NPS electronic systems, interviews with park and regional staff revealed widespread concern about electronic reporting systems, including PMDS, PMIS and FMSS. These concerns centered on the workload associated with electronic reporting relative to its utility to park and regional office staff. Staff interviewed generally estimated that a quarter of their time is taken up in reporting for all electronic systems. Further, it is the broad perspective of field staff that this reporting reduces rather than supports their ability to effectively manage park resources.

In addition, staff pointed to:

- inefficiencies arising from multiple, disparate software systems

- the requirement at times to duplicate entry of the same data into more than one system (According to the WASO Park Facility Management Division, a "bridge" to link FMSS and PMIS will be implemented in the fall of 2008 to resolve duplication of data entr.y)

- each system's requirement for a unique user name and password

- delays of up to 6-7 weeks in completing the security clearances required to access the NPS intranet (at which point, half the tenure of a seasonal staff person is over)

The Panel did not seek to verify field staff's estimates of the time that electronic systems entail nor did it conduct a workload analysis, which is beyond the scope of this study. Further, because FMSS, PMDS, PMIS, and other service-wide electronic systems were beyond the scope of this review, the Panel has refrained from recommending that NPS undertake a review of its electronic systems. However, a significant opportunity appears to exist for NPS to improve integration of electronic reporting systems.

PARK SUPERINTENDENT ACCOUNTABILITY

Ultimate authority and responsibility for each park is vested in its superintendent. Evaluations of superintendent performance by the regional director is the strongest mechanism identified during the course of this study for ensuring superintendent accountability across all elements of a park's mission. Managing park resources is a core responsibility of every park, but interviews with NPS staff revealed that ensuring the enjoyment of park visitors is frequently a more pressing

concern. Although performance evaluations offer a direct way to ensure attention to stewardship of park resources, since the number of GPRA goals was reduced in 2006, superintendent performance evaluations are no longer required to include cultural resource factors.

Recommendation #4: The Panel recommends that NPS include resource stewardship (cultural and natural) as an element in all superintendents' performance evaluations, in particular with respect to park cultural resources at risk.

INCREASED FLEXIBILITY

Based on suggestions by NPS staff, the Panel concludes that additional flexibility in two areas would enable NPS to make better use of existing resources.

Provide Travel Funds Consistent with Resource Management Strategies

Across the country, NPS has compensated for the loss of cultural resource professionals in the parks by relying increasingly on regional office staff and staff from other parks to carry out various monitoring, inventory, research, cataloging, and restoration activities. This model of service delivery depends on field staff traveling to and from the parks that are part of their purview, many of which are distantly located. At the same time, NPS frequently relies on staff who are given collateral duty responsibilities for cultural resources, such as assigning the management of museum collections to GS-5 employees in other job series. The success of this model depends on the collateral duty employee receiving adequate training, which in many cases requires traveling for face-to-face, hands-on training.

Each year since FY2003, Congress has imposed a ceiling on NPS travel funds. In addition, DOI proposed a further reduction in travel funds based on a Department-wide, across-the-board 10 percent reduction in the President's FY2009 Budget Request. As energy costs have risen sharply over the past year, NPS staff from many parks and regions reported that the travel ceiling is constraining staff from traveling to parks to complete funded projects. Tight travel budgets are also reportedly making it difficult for staff from other parks and regional offices to meet periodically to discuss common problems.

The Panel has not conducted a detailed analysis of NPS travel costs, funds, and ceiling, which is beyond the scope of this study. Nevertheless, the Panel finds that the ability of NPS to improve stewardship of park cultural resources is hampered by restrictions in travel, which undermine the management strategies of sharing skills among parks and relying extensively on collateral duty staff.

Recommendation #5: The Panel recommends that NPS seek sufficient travel ceiling to support skill-sharing between parks and regional offices, meet critical training needs, and facilitate cross-learning.

Increase the Time Parks Have to Obligate Project Funds

Without prompting, many park staff interviewed noted the hardship imposed by the delayed availability of funding until late in the second quarter of each fiscal year. Combined, delays by Congress in enacting annual appropriations bills and the time required for WASO and regional offices to allocate project funding have resulted in a situation where most park superintendents do not receive spending authority until late February, and assessments by WASO and the regional offices can delay the final availability of funds until May. This leaves parks with only a few months to execute projects, given the fact that NPS contract offices require that parks and regions submit contracts by July or August to meet the end-of-fiscal-year deadline for obligating funds. In some cases, this compressed time frame arbitrarily limits the scope of projects, forcing parks to segment coherent projects into multi-year stages at additional cost and delay. In all cases, this compressed time frame forces park staff to rush to get projects funded. Field staff overwhelmingly view this "time squeeze" as an impediment to sound stewardship of park cultural resources.

While Congressional delays in enacting appropriations bills are beyond NPS control, streamlining procedures within NPS by even three or four weeks to expand the time parks have to obligate project funds would benefit parks significantly. In FY2008, the NPS Comptroller's Office permitted the establishment of accounts and initiation of work on projects in the first quarter of the fiscal year, which was a dramatic improvement over prior years. Staff from the NPS Comptroller's office expressed support for a streamlining initiative and commitment to providing funding targets by the beginning of the fiscal year. WASO program staff, however, expressed reservations due to workload concerns related to accelerating decisions about regional funding allocations.

Recommendation #6: The Panel recommends that NPS expand the time that parks have to obligate project funds each fiscal year by applying assessments at the beginning of the year, accelerating the availability of approved funds, and streamlining contracting procedures.

FUNDING AND STAFFING

NPS staff's deep commitment to the resources in their care is evident in the parks, centers, regional offices, and WASO. At all grade levels, NPS staff quoted key sections of the "Organic Act" almost as second nature, taking their statutory responsibilities as solemn duty. NPS staff expressed pride in responding to the challenge of a leaner workforce through a variety of ways to reduce costs and increase efficiency. At the same time, many NPS staff expressed concern about the widening gap they perceive between the staff and funding available and the minimum effort required to care for park cultural resources.

The Panel finds that NPS stewardship of park cultural resources is challenged by: growing responsibilities; reduced funding in real terms, especially since FY2002; reduced staffing, and an apparent continuing shift from permanent to term positions; and impending retirements of key

staff – resulting in aggregate in putting at risk NPS stewardship of cultural resources of national significance.

Growing Responsibilities

Over the past two decades, the responsibilities carried out by park cultural resource programs have grown substantially. Acknowledgement of the importance of cultural landscapes has added an entirely new set of responsibilities, while a deepening appreciation of the significance of, and threats to, cultural resources has broadened understanding of what good stewardship entails. At the same time, more than 30 new park units – predominantly cultural and historical – have been added to the National Park System. This has expanded the land area and the universe of park cultural resources under care and, in some cases, created partnerships that require extensive coordination. Together, these changes have expanded responsibilities for park cultural resources at all levels.

At the same time, NPS has been appropriately challenged, as have all federal agencies, to demonstrate results, measure performance, and improve efficiency to justify continued funding. In addition, park and regional office staff are required to input information and maintain databases about the characteristics and condition of park cultural resources. The cumulative growth of measurement systems, reporting requirements, and databases has increased the workload of NPS staff.

Decreasing Funding and Staffing Levels

Funding

After taking into account the increased cost of federal pay raises and benefits and inflation with respect to other expenses, funding for park cultural resource programs FY1995-2008 has decreased by an annual average of 0.2 percent in real dollars. While park cultural resource programs experienced real growth through FY2002, that growth was followed by annual average decreases of 3.5 percent after inflation. Overall, FY2002-2008 funding for park cultural resources declined by 19 percent in real terms.

Over the FY1995-2008 period, funding for natural resource programs increased in real terms by an annual average of 4.2 percent (or 71 percent over the 14-year period). The sharp difference between funding changes for cultural resources and natural resources is due primarily to the highly successful Natural Resource Challenge launched in 1999. In 2000, NPS developed a proposal for a Cultural Resource Challenge of a similar scale, which was never formally transmitted to DOI or the Congress, reportedly due to concern about the difficulty of securing funds to carry out two Challenges simultaneously.

Staff

Staffing levels show a similar divergence. As Appendix K indicates, cultural resources and natural resources had nearly identical staffing levels in FY1995: 1,079 FTE for cultural resources, and 1,072 FTE for natural resources. During the period FY1995-2008, staffing levels

for natural resources rose by 335 FTE (31.2 percent), primarily as a result of the Natural Resource Challenge, while staffing levels for cultural resources declined by 294 FTE (27.2 percent) over this period.

Largely as a result of the Natural Resource Challenge, today funding for natural resources programs is double and staffing 79 percent greater than for park cultural resource programs, notwithstanding the fact that two-thirds of the 391 national parks were created because of their historic and cultural resources.

The need to manage park resources in an era of growing scarcity of funds is a reality that is widely accepted, as reflected by one regional cultural resource manager's observation: "Each year we lose seven permanent positions because our salary funds don't keep up with our salaries." A park superintendent similarly observed, "Every other year, I lose one permanent position." Many NPS field staff pointed out that the loss of cultural resource positions results in a reduction in professional skills in the parks, as remaining staff is pressed to handle responsibilities beyond their areas of training and expertise.

At the same time, NPS staff expressed pride in the creative solutions they have found to respond to budget and staffing challenges. They cited numerous examples of reforms, adjustments, and efficiencies including the following: consolidating supervision of multiple parks under a single superintendent; recruiting volunteers and student interns to perform a wide range of services; and augmenting federal funds with private donations.[27] To compensate for the loss of specialized staff, NPS staff reported that parks are shifting functions to regional office staffs, formally sharing positions between parks, and informally sharing skills among parks. One region has created sub-regional networks with organized procedures to coordinate skill-sharing among parks, a model that seems to justify examination for replication by other regions.

Still, NPS cultural resources staff reported that steadily increasing budget and staffing pressures have taken a toll on productivity, creativity and morale, as reflected by the following comments by park superintendents and park and regional cultural resource managers:

- "My staff and I are all tapped out on flexibility and creativity. You simply can't continue to be more and more creative forever."
- "The elimination of administrative positions is wasting the time of professional staff and reducing our efficiency. We have to do literally everything: contracts, invoices, copying, travel, office equipment repair, you name it."
- "The reductions are not just hurting the parks; they are killing our contracting and personnel services; the service we get from them is just terrible."
- "Contracting out is no panacea. Unless a federal employee who understands the resource writes the requirements and oversees the contractor, all you get is mush."

[27] Some NPS staff emphasized that parks must be entrepreneurial in raising private dollars. Other NPS staff warned that the increasing reliance on private funds is distorting the mission of NPS and its parks, because most private donors are only willing to give to narrow, high-profile activities, which align with only a narrow slice of NPS' mission.

A Shift from Permanent to Term Positions

Interviews with NPS staff revealed a widely shared concern that growing reliance on term employees is further undermining the capacity of many programs and the stability of park cultural resource programs in many parks and regions.[28] Although term appointments are intended for one-time projects of less than four years' duration, NPS staff report that many parks and regional offices now rely on term employees to cover a multitude of important, core and ongoing functions, such as serving as regional program leads for cultural resource programs, managing reporting systems and databases for both parks and regions, and overseeing museum collections. The higher turnover of term employees is believed to jeopardize consistent execution of these key functions. Several park cultural resource managers noted that it is time-consuming, exhausting, and wasteful to repeatedly hire and train term employees to perform core functions.

According to data provided by the Comptroller's office, the percentage of the overall NPS workforce that is permanent full-time declined modestly, from 77 percent in 1995 to 74 percent in 2007. Because NPS does not break down the division between full-time permanent versus other-than-permanent positions program by program, the Panel could not confirm widespread reports by NPS staff that park cultural resource programs have experienced, and are continuing to experience, a disproportionate shift to term positions relative to other NPS programs. WASO program staff reported their belief that this shift is occurring, agreed that term employees are filling core positions in both the parks and regional offices, and expressed concern that increasing use of term positions is straining stewardship of park cultural resources.

The Challenge of Succession Planning

Many NPS staff interviewed expressed concern about "the tidal wave of employees who are approaching retirement" (in the words of one) and the relatively thin ranks of experienced mid-career staff to assume positions of leadership. For example, NPS staff reported that each of the seven historians in one region has more than 27 years of service. Several NPS staff identified succession planning as the single greatest challenge facing NPS. The Panel did not conduct a workforce analysis, which is beyond the scope of this study, but notes that the NPS Director has made succession planning a service-wide priority. The Panel emphasizes the importance of succession planning for both WASO and field cultural resource staff.

Recommendation #7: The Panel recommends that NPS undertake an intensive service-wide effort (similar to the Natural Resource Challenge) to develop a comprehensive proposal, clear priorities, and sound justification to improve stewardship of park cultural resources, and seek increased funding and permanent staff to reduce risks to cultural resources of national significance and meet other critical needs.

Successfully carrying out a service-wide initiative on park cultural resources will require dynamic WASO leadership to engage staff from the parks, regional offices, and centers.

[28] "Project" funds can be used to pay the salary of term employees but not permanent staff.

NATIONAL LEADERSHIP

Ultimately, the Panel is concerned that cultural resources throughout the National Park System are at risk. The Panel has identified ways in which NPS can improve its stewardship of significant national resources by strengthening performance-based management, ensuring park superintendent accountability, increasing flexibility in the use of funds, and seeking additional staff and funding to reduce risks to cultural resources of national significance. Specific findings and recommendations in each of these areas have been outlined earlier in this section.

In addition to the steps outlined above, the Panel also recognizes that strong WASO leadership is required to effectively address and improve NPS stewardship of park cultural resources. The Panel therefore recommends that NPS undertake, as an urgent priority, the additional steps required to transform WASO Cultural Resources into a high-performing organization, with close oversight by the NPS Director's office. If it is not possible to make the current organization high performing, the Panel recommends that NPS create a separate Associate Director for Park Cultural Resources.

Create a High-Performing Organization

In addition to the recommendations previously outlined, the Panel's observations over the course of this review have resulted in recommendations that pertain specifically to WASO that would strengthen overall stewardship of park cultural resources. In the Panel's opinion, every high-performing organization must pay attention to these important communication and management issues:

- improve engagement of field staff in the regional offices and parks and provide stronger technical assistance
- improve communications to and with the parks and regional offices
- delegate appropriate authority to the Assistant Associate Director and program managers, subject to clear accountability standards
- respect chain of command and established lines of authority in internal decision-making
- actively work to build trust between cultural resource professionals and WASO top management

The Panel recognizes that critical challenges to the successful creation of a high-performing organization exist. First, the WASO Park Cultural Resources unit remains significantly under-staffed. Since 2005, when a major reorganization changed the structure of the Cultural Resources Directorate and reassigned many senior staff and managers, WASO staff working on park cultural resources has declined from approximately 28 FTE to approximately 22 FTE.[29]

[29] Based on ONPS Financial Plans adjusted for vacancies.

NPS staff indicate that efforts are now underway to fill a number of vacancies, several of which are long-standing.

Second, the total levels of funding and staff that the parks and regional offices commit to resource stewardship seems to reflect a growing disparity between programs. Since 2005 (the year of the reorganization of WASO Cultural Resources), both programs have experienced staff reductions, but cultural resources has lost far more staff (147 FTE, or 15.8 percent) than natural resources (19 FTE, or 1.3 percent). This disparity was especially pronounced over the past year (FY2008), as park cultural resources staffing declined by 74 FTE (8.6 percent) while natural resources experienced an increase of 20 FTE (1.4 percent).

Third, interviews with NPS staff interviewed who work in the parks, regional offices, and centers revealed widespread concern about the frequency and quality of communications from WASO, lack of engagement of field staff in strategic planning and goal setting, and ineffective advocacy for park cultural resources. In the Panel's view, this is contributing to a deterioration of the relationships between WASO and the field and has the potential to negatively impact WASO's ability to effect change.

Create a Separate Associate Director for Park Cultural Resources

Creating a new Associate Director for Park Cultural Resources would serve to elevate the profile and priority of cultural resources in the parks, placing these programs on equal footing with natural resource programs in the NPS organizational structure. The fact that two-thirds of the parks were created because of their cultural resources (and that every park has important cultural resources in its charge) would seem to justify a dedicated Associate Directorate. The structurally heightened status of park cultural resources, together with the increased focus on park cultural resources it would enable, may result in greater consideration of these needs and allow more direct and proactive communications with NPS staff in the regional offices and parks. Challenging this new organization at its inception to engage NPS field staff to develop a clear vision and comprehensive proposal for improving stewardship of park cultural resources would energize service-wide efforts.

While acknowledging that WASO Park Cultural Resources has faced continuing challenges since the 2005 reorganization, WASO Cultural Resources leadership strongly believes in the merits of consolidating all park cultural resource programs under a single Assistant Associate Director, and maintains that the benefits of the reorganization will be realized in the future. Although the Panel recognizes the logic of the current organizational structure (see Appendix F) and understands that reorganizations usually require a period of time for organizational adjustment, three and a half years seems inordinately long to produce results.

Some suggest that creating a separate Associate Director for Park Cultural Resources could destroy the synergies that have developed between park cultural resources and the national historic preservation program under the same Associate Director over a 25-year period. The Panel recognizes these synergies, but notes the fundamental differences between managing programs that directly care for park assets and managing the external partnership programs that comprise the national historic preservation program. Stewardship of park cultural resources

involves direct fiduciary responsibility for, and management of, structures, sites, and objects under NPS custody and control. In contrast, the national historic preservation program involves making grants, creating incentives, and issuing regulations designed to mitigate adverse consequences to historic resources that are under the control of others. The policies and skills required for the former are very different than the policies and skills required for the latter. If NPS creates a separate Associate Director for Park Cultural Resources, priority should be placed on maintaining close coordination with the national historic preservation program.

Creating an additional Associate Director would no doubt entail additional administrative staff, such as a budget officer and dedicated administrative staff, exacerbating competition for scarce FTE. The Panel notes, however, that additional WASO staff will be required, in any event, to provide stronger national leadership through more direct engagement with field staff. The Panel urges NPS to weigh the overall advantages, disadvantages, and tradeoffs involved in creating a separate Associate Director for Park Cultural Resources. In the Panel's view, there is a strong argument for the equal organizational status of park cultural resources with natural resources.

Recommendation #8: The Panel recommends that NPS significantly strengthen WASO leadership to improve stewardship of cultural resources throughout the parks by: 1) implementing the changes needed to make the current WASO organization high performing; or 2) creating a separate Associate Director for Park Cultural Resources.

INDIVIDUAL PROGRAM FINDINGS AND RECOMMENDATIONS

The Panel finds that the application of FMSS to archeological sites, cultural landscapes, and historic structures is unsatisfactory due to this system's reliance on Current Replacement Value, which is difficult for historic resources. That said, the Panel also concludes that FMSS offers a practical means to allow these sites, landscapes, and structures to compete for necessary maintenance, rehabilitation, and repair funding, and therefore makes no recommendation in this area. The Panel, nonetheless, encourages NPS to develop more accurate estimates of deferred maintenance for maintained archeological sites and cultural landscapes.

Archeology

The Panel concludes that the Archeology Program needs more strategic focus to direct attention and resources to critical activities and highest priority sites. Most archeologists in the parks and regional offices have been occupied for the past few years in a rush to complete site condition assessments as called for by Corrective Action Plans developed in response to the 2004 heritage assets audit. Although these assessments are valuable, they have diverted attention and resources from other critical activities in some regions. These programmatic tensions are increasing in regions with large and distant parks, as the time and travel costs to assess the condition of ever more distant sites increase. In all likelihood, one or more regions will fail to meet their condition assessments targets over the coming years, despite good faith efforts.

Recommendation #9: The Panel recommends that NPS revise regional Corrective Action Plans for the archeology program, as needed, to take into account the time and cost involved in traveling to archeological sites.

In addition, the current GPRA and PART measures ignore enormous differences in sites' significance and vulnerability (when they calculate the percentage of all archeological sites that are in good condition). Given current funding limitations, the Panel concludes that the NPS Archeology Program needs to set new service-wide priorities that take into account sites' significance and vulnerability. For example, some sites are at risk from looting and vandalism, changes in sea level, extreme weather events, glacial melt, increased erosion, deforestation, and desertification. A performance measure that focuses attention on sites that park management identifies as needing inventory and treatment will direct resources more effectively. The project Working Group concurred in the need for a new performance measure but counseled the Panel against recommending a specific measure because of the complexities involved and the need for input from the field.

Recommendation #10: The Panel recommends that NPS accelerate efforts by WASO and field staff to develop a new performance measure for the archeology program that takes sites' significance and vulnerability into account.

A majority of park and regional office archeologists emphasized the need for online access to archeological site data. WASO staff indicated that technical and funding problems had delayed this conversion, which is expected to be complete in FY2009.

Recommendation #11: The Panel recommends that NPS accelerate completion of the conversion of ASMIS to a web-based system to improve access to archeological site data and better meet the needs of archeologists in the parks and regional offices.

Cultural Landscapes

Although the Cultural Landscapes Program is still maturing, it is functioning well with all regions making slow but steady progress in establishing baseline inventories resources.

Historic Structures

The Historic Structures Program is a mature program that is functioning well according to NPS staff at all levels, although the needs of historic and prehistoric structures far exceed available resources, as made clear by the NPS deferred maintenance estimate of $1.9 billion. The Panel also finds troubling the fact that there are currently 2,811 historic structures of national significance in poor condition (Management Categories A and B). In most parks, resource managers work closely and cooperatively in partnership with facilities maintenance staff, whose support is critical to preserving historic structures.

Based on the assessment of a majority of NPS staff, the Panel concludes that current performance measures for historic and prehistoric structures are generally aligned well with the needs of the resource. Recognizing that funding resources are inadequate to maintain all

structures in good condition, NPS has put in place consistent systems to prioritize the treatment of structures through the LCS Management Categories and the FMSS Asset Priority Index. Interviews with NPS staff indicate that there is less than 50 percent coincidence in historic structures between the LCS and FMSS electronic systems, even though all historic structures listed in LCS should be included in FMSS and identified as "historic".

Recommendation #12: The Panel recommends that NPS develop an expeditious and efficient schedule to ensure that all parks reconcile differences between LCS and FMSS so that these two systems' records of historic structures (assets) coincide.

History

Based on the assessment of NPS staff and external experts, the Panel recognizes the value of both administrative histories and historic resource studies for managing park cultural resources. According to NPS staff, many parks lack an up-to-date administrative history and/or a historic resource study. The Panel recommends two separate performance measures because in a given park, at a given time, one or the other may be more important. This is a change from the previous standard, which was based on a park completing both.

Recommendation #13: The Panel recommends that NPS develop separate performance measures for park administrative histories and historic resource studies and administer funding for these histories and studies from a single fund source.

Museum Management

The Panel concludes that NPS is failing to fulfill its public trust for museum collections, because 45 percent of its collections are not cataloged. As a result, 56 million items are irretrievable and unavailable to park staff, researchers, and the public. Based on the assessments of NPS staff in the parks, regional offices, and WASO as well as outside experts, the Panel concludes that the Museum Management Program faces four fundamental challenges in reducing the backlog:

- Some projects that produce field collections are failing to provide for cataloging, as NPS policy requires, thus adding to the backlog instead of increasing the cataloged collection.

- Archives that are unrelated to managing park resources are inappropriately being sent to and accessioned by museums.

- Applying a curatorial approach to archives increases the time and cost of cataloging.

- Lack of skills and training of staff working in park museums is hampering effectiveness.

The Panel concludes that the backlog in museum collections is a service-wide problem that the park Museum Management Program cannot solve alone. Solving the backlog problem will also require the cooperation of other NPS program managers, the support of park superintendents, and leverage by the NPS Director. The Panel offers the following recommendations aimed at increasing cataloging and reducing the backlog expeditiously.

Recommendation #14: The Panel recommends that NPS enforce current policy to avoid inappropriately adding to museums' uncataloged backlog by: deeming "incomplete" any project that produces uncataloged field collections; administering research permits to ensure that collections produced and intended for long-term preservation are cataloged; ensuring that archival records that are unrelated to resource management are not accessioned by museums; and creating regional review panels to ensure that large donations (e.g., archival collections >100 linear feet) are consistent with a sound museum management plan and scope of collection.

Recommendation #15: The Panel recommends that NPS ensure that museums follow professional archival methods by: expediting revisions to Appendix D of the Museum Handbook; appointing a fully qualified regional archivist for every region; developing and delivering training in professional archival methods for all staff involved in archiving, and providing on-site technical assistance to demonstrate the practical application of professional archival standards.

Recommendation #16: The Panel recommends that NPS use separate measures to track the backlog of archives and other museum items.

The current "1,600 items per linear foot" conversion factor, which allows calculation of a consolidated backlog estimate, fails to highlight the fundamental differences in cataloging archives and other museum objects. Adopting a more widely used measure for archives, such as cubic feet, will separately track the backlog of archives and other museum objects, reinforce the need for different approaches to cataloging, and direct attention to archives as the central challenge. The Panel also recommends that NPS seek funding and staff resources to expand access to its collections by researchers and the public and measure the use of its collections. For example, in celebrating the NPS Centennial, NPS could expand the number of items exhibited in museums, visitors centers, and online as well as market its museum collections to academics, other researchers, and the public. At the same time, NPS should calculate the additional workload related to support such research as and improve exhibits for the Centennial celebration.

Recommendation #17: The Panel recommends that NPS make public search tools more user friendly, ensure that museum staff use the web catalog module of ANCS+, and provide training as necessary.

Recommendation #18: The Panel recommends that NPS develop a new performance measure (based on data that museums already report) to track and report the use of museum collections by park staff, researchers, and the public.

Management Improvement Plan

In response to the 2004 PART review, NPS identified a number of corrective measures in its Management Improvement Plan. This independent evaluation by the Academy represents completion of all steps identified in the Management Improvement Plan related to park cultural resource programs.

PANEL AND STAFF

PANEL

Frank S. M. Hodsoll,* *Chair*—Consultant, Logistics Management Institute. Former Deputy Director for Management, U.S. Office of Management and Budget; Chairman, National Endowment for the Arts, National Council on the Arts and Federal Council on the Arts and Humanities; Deputy Assistant to the President and Deputy to Chief of Staff James A. Baker, III; Deputy U.S. Representative for Non-Proliferation and Director, Office of the Law of the Sea Negotiations, U.S. Department of State.

Denis P. Galvin—Former Deputy Director of the National Park Service, whose prior positions included Associate Director for Planning and Development, Manager of the Denver Service Center, and Associate Regional Director for Operations. A widely respected expert in national parks, Galvin currently serves on the Board of Trustees of the National Parks Conservation Association and is a consultant to the 2009 PBS series, America's National Parks.

James Kunde*—Associate Professor and Program Coordinator, University of Texas, Arlington. Former Executive Director, Coalition to Improve Management in State and Local Government; Executive Director, Public Services Institute; Senior Staff Assistant, Center for Dispute Resolution, Southern Methodist University; Director of Programs, Charles Kettering Foundation; City Manager, City of Dayton, Ohio; City Development Director, Kansas City, Missouri.

STAFF

J. William Gadsby,* *Vice President for Academy Studies*—Former Director, Management Studies Program, National Academy of Public Administration. Former positions with U.S. General Accounting Office: Senior Executive Service; Director, Government Business Operations Issues; Director, Federal Management Issues; Director, Intergovernmental and Management Issues. Former Assistant Director, Financial Management Branch, U.S. Office of Management and Budget.

Lena E. Trudeau, *Program Area Director*—Ms. Trudeau oversees the National Academy's work with the U.S. Coast Guard, the Environmental Protection Agency, the Department of State and the National Park Service. In addition, Ms. Trudeau directs the Collaboration Project, an independent forum of leaders committed to leveraging web 2.0 and the benefits of collaborative technology to solve government's complex problems. Ms. Trudeau's previous roles include: Vice President, The Ambit Group; Marketing Manager, Nokia Enterprise Solutions; Principal Consultant, Touchstone Consulting Group; Consultant, Adventis Inc.; and Associate, Mitchell Madison Group.

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* *Academy Fellow*

Don Ryan, *Project Director*—Previously served as project director for National Academy's study Panels that helped design a national system of environmental indicators and reviewed the national historic preservation program. Former positions: founder and executive director, Alliance for Healthy Homes, a national public interest policy and advocacy organization; Professional Staff, U.S. House of Representatives Committee on Appropriations; Program Analyst, U.S. Department of Transportation, Office of the Secretary, Budget and Program Evaluation; Program Analyst, U.S. Coast Guard; Commissioned Officer, U.S. Coast Guard Reserve.

Mark Hertko, *Senior Research Analyst***—**Academy projects include the Department of Interior; Environmental Protection Agency's National Center for Environmental Innovation, Office of Environmental Information, Office of Water, Office of Environmental Justice, Office of Air and Radiation; Department of Energy's Office of Energy Efficiency and Renewable Energy; and others. Former positions include: Government Relations Researcher Intern, Defenders of Wildlife; Quality Assurance/Quality Control Inspector for Indoor Mercury Contamination, Accord Enterprises; Community Relations Coordinator Intern, Illinois Environmental Protection Agency; Environmental Educator, Illinois Ecowatch.

Martha S. Ditmeyer, *Senior Administrative Specialist*—Staff member providing technical support for a wide range of Academy studies. Former staff positions at the Massachusetts Institute of Technology, Cambridge, MA and the Communications Satellite Corporation, Washington D.C. and Geneva, Switzerland.

WORKING GROUP MEMBERS

Michele Aubry
Archeologist, Archeology Program
Washington Office, National Park Service

Erica Avrami
Preservation Planner/Consultant

Randy Biallas
Chief Historical Architect and Manager, Park Historic Structures and Cultural Landscapes Program
Washington Office, National Park Service

Lynn Black
Acting Program Manager, Park Museum Management Program
Washington Office, National Park Service

Marta de la Torre
Interim Director, The Patricia and Phillip Frost Art Museum
Florida International University

David Louter, Ph.D.
History Program Manager
National Park Service, Pacific West Regional Office

Ann McMullen, Ph.D.
Curator, National Museum of the American Indian
Smithsonian Institution Cultural Resources Center

Dan Odess, Ph.D.
Assistant Associate Director, Park Cultural Resource Programs
Washington Office, National Park Service

Bob Page
Chief, Cultural Resources
Northeast Regional Office
National Park Service

Barbara Pahl
Director, Mountains-Plains Office
National Trust for Historic Preservation

Jeff Rasic, Ph.D.
Archeologist, Yukon Charley Rivers/Gates of the Arctic National Parks and Preserves
National Park Service

Tef Rodeffer, Ph.D.
Manager, Museum Services
National Park Service, Intermountain Region

Dennis Stanford, Ph.D.
Curator of Archeology, National Museum of Natural History
Smithsonian Institution

Bob Sutton, Ph.D.
Chief Historian and Program Manager, Park History Program,
Washington Office, National Park Service

LIST OF INDIVIDUALS INTERVIEWED

Michele Aubry, Archeologist, Archeology Program, National Park Service, Washington, D.C.

Erica Avrami, Preservation Planner/Consultant

Joy Beasley, Chief, Cultural Resources, Monocacy National Battlefield, National Park Service

Barbara Beroza, Curator of Collections, Yosemite National Park, National Park Service

Randy Biallas, Chief Historical Architect and Manager, Park Historic Structures and Cultural Landscapes Program, National Park Service, Washington, D.C.

Riana Bishop, Acting Superintendent, Kennesaw Mountain National Battlefield Park, National Park Service

Lynn Black, Acting Program Manager, Park Museum Management Program, National Park Service, Washington, D.C.

David Blackburn, Chief, Cultural Resources and Programs, Lowell National Historical Park, National Park Service

Linda Blaser, Associate Director, Media Assets, Harpers Ferry Center, National Park Service

Randall Bohnert, Administrative Officer, Park Cultural Resource Programs, National Park Service, Washington, D.C.

Jessica Bowron, Budget Analyst, Office of the Comptroller, National Park Service, Washington, D.C.

Dan Brown, Superintendent, Chattahoochee National Recreation Area, National Park Service

Dan Brown, Preservation Specialist, Point Reyes National Seashore, National Park Service

Margie Coffin Brown, Historical Landscape Architect, Olmsted Center for Landscape Preservation, National Park Service

Michael Brown, Strategic Management and Accountability, LLC, Retired Chief, Strategic Planning, National Park Service, Washington, D.C.

Kathleen Byrne, Registrar, Park Museum Management Program, National Park Service, Washington, D.C.

Steve Canright, Preservation Specialist, San Francisco Maritime National Historical Park National Park Service

Brian Carlstrom, Chief, Resources, Chesapeake and Ohio Canal National Historical Park, National Park Service

Allen Cooper, Manager, Archeology Program, Northeast Regional Office, National Park Service

Brian Kelly Courkamp, Cultural Resource Program Manager, Center for State of the Parks, National Parks Conservation Association

Craig Crutchfield, Chief, Interior Branch, Office of Management and Budget

Jane Custer, Chief, Cultural Resources, Antietam National Battlefield, National Park Service

John Debo, Superintendent, Cuyahoga Valley National Park, National Park Service

Carola DeRooy, Archivist, Point Reyes National Seashore, National Park Service

Victor Ector, Acting Facility Manager, Martin Luther King Jr. National Historic Site, National Park Service

Melissa English-Rias, Chief, Interpretation, Martin Luther King Jr. National Historic Site, National Park Service

Abby Sue Fisher, Ph.D., Curator, Golden Gate National Recreation Area, National Park Service

Judy Forte, Superintendent, Martin Luther King Jr. National Historic Site, National Park Service

Eliot Foulds, Historical Landscape Architect, Olmsted Center for Landscape Preservation, National Park Service

Bert Frost, Ph.D., Associate Director, Natural Resources, Stewardship, and Science, National Park Service, Washington, D.C.

Robert Gay, Chief, Budget Formulation, Office of the Comptroller, National Park Service, Washington, D.C.

Michael Grimes, Chief, Records Management, National Park Service, Washington, D.C.

Stephen Haller, Historian, Golden Gate National Recreation Area, National Park Service

David P. Harrington, Deputy Comptroller, Office of the Comptroller, National Park Service, Washington, D.C.

Rick Harris, Superintendent, Chamizal National Memorial, National Park Service

Myra Harrison, Superintendent, Longfellow, Olmstead and Kennedy National Historic Sites, National Park Service

Paul Hartwig, Associate Regional Director, Natural and Cultural Resources, Partnerships, and Interpretation, Southeast Regional Office, National Park Service

Bob Hartzler, Preservation Specialist, Pacific West Regional Office, National Park Service

Tim Harvey, Chief, Park Facility Management, National Park Service, Washington, D.C.

Paul L. Hatchett, Jr., Chief, Historic Architecture, Southeast Regional Office, National Park Service

John Hiscock, Superintendent, Pipe Spring National Monument, National Park Service

Brian Hoduski, Curator, Keweenaw National Historical Park, National Park Service

John Howard, Superintendent, Antietam National Battlefield, National Park Service

Tim Hudson, Associate Regional Director, Resources and Operations, National Park Service, Alaska Regional Office

Laurin Huffman, Historical Architect, Pacific West Regional Office, National Park Service

David Humphrey, Chief, History, Architecture and Landscapes, Yosemite National Park, National Park Service

Robbyn Jackson, Chief, Cultural Resources and Museum Management, San Francisco Maritime National Historical Park Museum, National Park Service

Jon Jarvis, Regional Director, Pacific West Region, National Park Service

Maureen Joseph, Regional Historical Landscape Architect, National Capital Regional Office, National Park Service

Willie Johnson, Historian, Kennesaw Mountain National Battlefield Park, National Park Service

Bennie Keel, Ph.D., Acting Director, Southeast Archeological Center, National Park Service

Craig Kenkel, Chief, Cultural Resources and Museum Management, Golden Gate National Recreation Area, National Park Service

Laura Kirn, Chief, Branch of Anthropology and Archeology, Yosemite National Park, National Park Service

Kimball Koch, Cultural Landscapes Inventory Coordinator, Pacific West Regional Office, National Park Service

Kirsten Kvam, Curator, Point Reyes National Seashore, National Park Service

Lucy Lawliss, Cultural resource program Manager, Rosie the Riveter World War II Home Front National Historical Park, National Park Service

Susan Long, Regional Historical Architect, National Capital Regional Office, National Park Service

David Louter, Ph.D., Historian, Pacific West Regional Office, National Park Service

Joel Lynch, Acting Chief, Strategic Planning, National Park Service, Washington, D.C.

Janet Snyder Matthews, Ph.D., Associate Director, Cultural Resources, National Park Service, Washington, D.C.

Kate McCord, Budget Analyst, Office of the Comptroller, National Park Service, Washington, D.C.

Sande McDermott, Deputy Associate Regional Director, Cultural Resources, Intermountain Regional Office, National Park Service

Ann McMullen, Ph.D., Curator, National Museum of the American Indian, Smithsonian Institution Cultural Resources Center

Frank Miele, Ph.D., Chief, History, Southeast Regional Office, National Park Service

Nora Mitchell, Assistant Regional Director, Conservation Studies and Director, Conservation Study Institute, Northeast Regional Office, National Park Service

Clark Moore, Chief Ranger, Martin Luther King Jr. National Historic Site, National Park Service

Lloyd Morris, Chief Ranger, Kennesaw Mountain National Battlefield Park, National Park Service

Saudia Muwwakkil, Public Relations Specialist, Martin Luther King Jr. National Historic Site, National Park Service

Jim Nations, Ph.D., Vice President, Center for the Parks, National Parks Conservation Association

Darwina Neal, Chief, Cultural Resource Preservation Services, National Capital Regional Office, National Park Service

Niki Nichols, Ph.D., Chief, Resource Management and Science, Yosemite National Park National Park Service

Diane Nicholson, Regional Curator, Pacific West Regional Office, National Park Service

Craig Obey, Vice President, Government Affairs, National Parks Conservation Association

Dan Odess, Ph.D., Assistant Associate Director, Park Cultural Resource Programs, National Park Service, Washington, D.C.

Bob Page, Director, Olmsted Center for Landscape Preservation and Chief, Cultural Resources Northeast Regional Office, National Park Service

Barbara Pahl, Director, Mountains-Plains Office, National Trust for Historic Preservation

Giles Parker, Deputy Director, Northeast Museum Services Center, National Park Service

Chuck Parrott, Historical Architect, Lowell National Historical Park, National Park Service

Jerry Pendleton, Assistant Regional Director, Strategic Planning, National Park Service, Southeast Regional Office

Dwight T. Pitcaithley, Ph.D., Retired Chief Historian, National Park Service, New Mexico State University

Stephen Potter, Ph.D., Regional Archeologist, National Capital Regional Office, National Park Service

Jeff Rasic, Ph.D., Archeologist, Yukon Charley Rivers/Gates of the Arctic National Parks and Preserves, National Park Service

Janet Regan, Museum Technician, Saugus Iron Works National Historic Site, National Park Service

Tef Rodeffer, Ph.D., Manager, Museum Services, Intermountain Regional Office, National Park Service

Mark Rudo, Archeologist, Pacific West Regional Office and Point Reyes National Seashore, National Park Service

Carol Salmons-Perez, Curator, Saugus Iron Works National Historic Site, National Park Service

Gary Scott, Regional Historian, National Capital Regional Office, National Park Service

Dick Sellars, Ph.D., Author of *Preserving Nature in the National Parks: A History*, Retired Historian, National Park Service

Jim Shea, Museum Manager, Longfellow National Historic Site

Dan Sheidt, Chief, Cultural Resources, Southeast Regional Office, National Park Service

Cheryl Shropshire, Information Technology Specialist, Martin Luther King Jr. National Historic Site, National Park Service

Jerry Simpson, Assistant Director, Workforce Management, National Park Service, Washington, D.C.

Rick Slade, Chief, Science and Resource Management, Chattahoochee National Recreation Area, National Park Service

Woody Smeck, Superintendent, Santa Monica Mountains National Recreation Area, National Park Service

Russ Smith, Superintendent, Fredericksburg and Spotsylvania National Military Park, National Park Service

Mike Snyder, Regional Director, Intermountain Regional Office, National Park Service

Dennis Stanford, Ph.D., Curator of Archeology, National Museum of Natural History, Smithsonian Institution

Bob Sutton, Ph.D., Chief Historian and Manager, Park History Program, National Park Service, Washington, D.C.

Cyndi Syzmanski, Director, Center for Park Management, National Parks Conservation Association

Jennifer Talken-Spaulding, Cultural Resource Specialist, National Mall and Memorial Parks, National Park Service

Sam Tamburro, Historian, Chesapeake and Ohio Canal National Historical Park, National Park Service

Sharon Gibbs Thibodeau, Deputy Assistant Archivist for Records Services, National Archives and Records Administration

Pat Tiller, Retired, Deputy Associate Director, Cultural Resources, National Park Service, Washington, D.C.

Stephanie Toothman, Ph.D., Chief, Cultural Resources, Pacific West Regional Office, National Park Service

Marta de la Torre, Interim Director, The Patricia and Phillip Frost Art Museum, Florida International University

Susan Trail, Superintendent, Monocacy National Battlefield, National Park Service

Patty Trap, Superintendent, Saugus Iron Works National Historic Site, National Park Service

Peggy Albee Vance, Manager, Historic Architecture Program, Northeast Regional Office, National Park Service

Joe Wallis, Budget Officer, Cultural Resources, National Park Service, Washington, D.C.

Paul Weinbaum, Ph.D., Manager, History Program, Northeast Regional Office, National Park Service

Dan Wenk, Deputy Director, National Park Service, Washington, D.C.

Pam West, Director, Museum Resource Center, National Capital Region, National Park Service

Perry Wheelock, Chief, Resource Management, National Mall and Memorial Parks, National Park Service

Gordon White, Chief, Cultural Resources, Point Reyes National Seashore, National Park Service

Ron Wilson, Chief Curator and Manager, Park Museum Management Program, National Park Service, Washington, D.C.

Sara Wolf, Director, Northeast Museum Services Center, National Park Service

INTERVIEW QUESTIONS

Working Group Members

1. How have you been involved with or exposed to NPS cultural resource programs?
2. What does NPS do well within (your area of expertise)?
3. What are the challenges with NPS cultural resource programs?
4. Are you familiar with the performance measures, goals and targets that NPS cultural resource program uses?
5. If so, what is your assessment of the goals and performance measures for (your area of expertise)? Are they appropriate? Where might they be off target?
6. What changes would you make to NPS goals, targets, reporting systems, inspection cycles, etc. to improve accountability and performance?
7. Are you familiar with performance measures that other organizations that manage cultural resources are using that NPS should consider?
8. Some superintendents place a higher priority on cultural resources than others. Does the current performance system work to ensure that superintendents value cultural resources?
9. If you could get NPS to do or change one thing right now, what would it be?
10. Do you have any burning questions related to measuring the performance of cultural resource programs that you'd like us to cover in our interviews?
11. Is there anyone within NPS you strongly recommend we interview?

Questions for NPS Regional Office Staff

1. Please give us your name, title, and contact information for our records.
2. In your region, how are cultural resource staff divided between the regional office and the parks – and what functions do you perform for the parks?
3. What performance measures do you use to allocate cultural resource funds and oversee preservation of park cultural resource?
4. How does WASO hold your regional office accountable?
5. How does your regional office hold each park accountable for results? What are the consequences of parks not meeting performance targets?
6. How are the targets set for each park – some parks seem to be under great pressure to produce, while others apparently achieve their targets easily?
7. What is your assessment of the goals and performance measures for each of the cultural resource programs – which ones are working well – which ones are off target?
    a. Historic structures
    b. Cultural landscapes
    c. Archeology
    d. Museum collections
8. What changes would you make to NPS goals, targets, reporting systems, inspection cycles, etc. to improve accountability and performance?
9. Some superintendents place a higher priority on cultural resources than others. Does the current performance system work to ensure that superintendents value cultural resources?
10. How are CR project needs identified in parks without professional CR staff?
11. How does your region select CR projects that parks recommend for funding?
12. How does a park's past performance on projects affect funding decisions?
13. Nationwide, a significant share of CR staff are term employees. Is that true in your region – and what do you see as its impact?
14. Does performance-based budgeting affect staffing decisions? When a CR job becomes vacant in your region, who decides whether to fill it and on what basis?
15. Who handles Section 106 and other compliance reviews, and how has that workload changed? How much time/FTE is spent on Section 106?
16. What do you see as the primary purpose of reporting program accomplishments?
17. Do you believe the reporting workload is reasonable for CR programs?
18. What would you say your region does especially well in terms of connecting need, performance, and resources?
19. Performance data are reported or collected for each park, but WASO holds each region accountable. What do you think about shifting accountability and rewards from the regional level to the parks?
20. What do you rely on WASO for? What would you like WASO to do differently?
21. If you could have one thing done or changed right now, what would it be?

Questions for Park Superintendents

1. At most parks, the urgency of visitor services and maintenance needs puts a squeeze on cultural resources. How do you manage that tension?
2. What are your top priorities for cultural resources in your park – and what's the basis for these priorities?
3. How do WASO line managers and CR staff and the Regional Office affect your decisions on priorities?
4. What performance measures do you use for what purposes?
5. How are performance targets set for your park and do you think they are reasonable?
6. How do your GPRA goals and performance measures square with your park's mission and your priorities?
7. What changes would you make to NPS goals, targets, reporting systems, inspection cycles, etc. to improve accountability and performance and stewardship of resources.
8. Nationwide, a significant share of CR staff are term employees. Is that true in your park – and what do you see as its impact?
9. What would you say your park does especially well for cultural resources in terms of connecting need, performance, and resources?
10. Performance data are reported or collected for each park, but WASO holds each region accountable. What do you think about shifting accountability and rewards from the regional level to the parks?
11. What do you rely on WASO cultural resources for? What would you like WASO to do differently?
12. If you could one thing done or changed right now, what would it be?

Questions for Park Cultural Resource Managers and Staff

1. Please give us your name, title, and contact information for our records.
2. What's going well with cultural resources in your park – by resource?
3. What's not going well – what are your biggest challenges?
4. In your park, how are cultural resource needs faring in competition with other programs' for funds and FTE?
5. How do performance measures affect the way you manage cultural resources in your park?
6. How are the targets set for your park and are they reasonable?
7. How does your regional office hold your park accountable for results?
8. What is your assessment of the GPRA goals and performance measures for cultural resources – which ones are working well – which ones are off target?
9. What changes would you make to goals, reporting systems, inspection cycles, etc. to improve accountability and performance for each cultural resource program?
10. What functions does the regional office provide for cultural resource in your park and how satisfied are you with their support?
11. Nationwide, a significant share of CR staff are term employees. Is that true in your park – and what do you see as its impact?
12. How does performance-based budgeting affect staffing decisions? When a CR job becomes vacant in your park, who decides whether to fill it and on what basis?
13. Who handles Section 106 and other compliance reviews, and how has that workload changed? How much time/FTE is spent on Section 106?
14. What are the most/least burdensome aspects of this compliance – and how might compliance workload be reduced while reasonably assuring actual compliance?
15. What would you say your park does especially well for cultural resources in terms of connecting need, performance, and resources?
16. Performance data are reported or collected for each park, but WASO holds each region accountable. What do you think about shifting accountability and rewards from the regional level to the parks?
17. What do you rely on WASO cultural resources for? What would you like WASO to do differently?
18. If you could have one thing done or changed right now, what would it be?

Questions for External Stakeholders

1. Please give us your name, title, and contact information for our records.
2. How have you been involved with or exposed to NPS cultural resource programs?
3. What would you say NPS is doing well in terms of stewardship of cultural resources?
4. What is not going well with NPS cultural resource programs?
5. Are you familiar with NPS performance standards for cultural resources?
6. If so, what is your assessment of the goals and performance measures for (your area of expertise)? Are they appropriate? Where might they be off target?
7. Are you familiar with performance measures that other organizations that manage cultural resources are using that NPS should consider?
8. Some superintendents place a higher priority on cultural resources than others. Does the current performance system work to ensure that superintendents value cultural resources?
9. What is your assessment of how NPS regional offices hold parks accountable for cultural resources?
10. What is your assessment of how NPS Washington office holds the regions accountable?
11. If you could get NPS to do or change one thing right now, what would it be?

Program Specific Questions

Historic Structures

1. How is FMSS working for needs assessment, priority setting, cost estimating?
2. How do historic structures fare in competition for facility funding?
3. Who makes condition assessments and are they qualified?
4. Who oversees work on historic structures to ensure its quality
5. Do LCS and PMDS agree on the # of historic properties? If not, why not?

Cultural Landscapes

1. How is FMSS working for needs assessment, priority setting, cost estimating?
2. What are your targets for cultural landscape inventories over the next few years – and will you achieve them?
3. What are the prospects for project funding for CLI?
4. What strategies are you using to augment project funding?

Archeology

1. How is FMSS working for needs assessment, priority setting, cost estimating?
2. What do you think of the current goals and targets for archeology?
3. What recommendations do you have for better measures and why?
4. How are funding criteria aligned with stewardship?

Museum Collections

1. Why is NPS in the collections business?
2. How many objects are in your park's collection – how many cataloged?
3. How important is reducing the backlog to you – and why?
4. Where do your museum facilities stand in terms of meeting preservation and protection standards?
5. Do you think these standards are reasonable?
6. What are your top priorities for corrective action to meet these standards?
7. Do you think reducing the average cost of cataloging a museum object is a valid goal? What was the average cost for your park?
8. When it comes to cataloging and backlog, do you think NPS should distinguish between archives and objects/specimens?
9. Do you think streamlining the deaccessioning process is justified?

Park History

1. Has the administrative history of your park been written? If so, when?
2. If your park's history were available, what value would it serve? To whom?
3. Where are the materials that would need to be researched to write your park's history?
4. How much time and money do you think would be required to do justice to this task?
5. Where would you place your park's administrative history in terms of priorities against other historic resource and cultural resource needs?

NPS Cultural Resources Goals and Measures

Actual and targets based on FY 2009 President's Budget

Goal/Measure	DOI/NPS GPRA goal	NPS goal	PART Measure	2007 Actual	2008 Target	2012 Target
Historical Structure Program						
Percent of historic structures good condition (Ia5)	X			57.5% (14,771 of 25,687)	53.5% (14,912 of 27,865)	57.3% (15,961 of 27,865)
Comments	This goal is reported and certified by the park superintendants in the Performance Management Data System (PMDS). This goal accounts for all historical structures that are 1) listed on or eligible for listing on the National Register of Historic Places, 2) structures that the park is legislated to preserve, and 3) structures for which it has been decided through the park planning process to be managed as a cultural resource. The PART measure (below) reports only those historic structures in the List of Classified Structures (LCS) database. Good condition is defined as when the structure possesses integrity of location, design, setting, materials, workmanship, feeling, and association to the historically significant period(s) based on the National Register Criteria for Evaluation (36 CFR 60.4), and the structure and important features are intact, structurally sound and performing their intended purpose. For prehistoric or historic ruined structures listed on or eligible for listing on the National Register of Historic Places, the assignment of condition should be based on the goal of maintaining the structure's integrity of location, design, setting, materials, workmanship, feeling, and association, and stability of the structure as acquired, excavated, or existing. Structures managed as a cultural resource based on legislation or the park planning process are in good condition when the structure and important features are intact, structurally sound and performing their intended purpose.					
Percent of historic and prehistoric structures in good condition (PART CR-1)			X	53.4% (14,377 of 26,898)	54%	56%
Comments	This goal is reported by the WASO program in OMB's PARTweb data system. This PART measure reports only those historic structures in the official database. The DOI/NPS GPRA goal (above) includes all historic structures managed by parks rather than only those listed in the List of Classified Structures (LCS) database.					
Percent of historic structures on the List of Classified Structures that have complete, accurate and reliable information		X	X	80% (21,512 of 26,896) 1,992 added in FY 2007	78.6% (21,140 of 26,896) in FY 2008	100% (26,896 of 26,896)

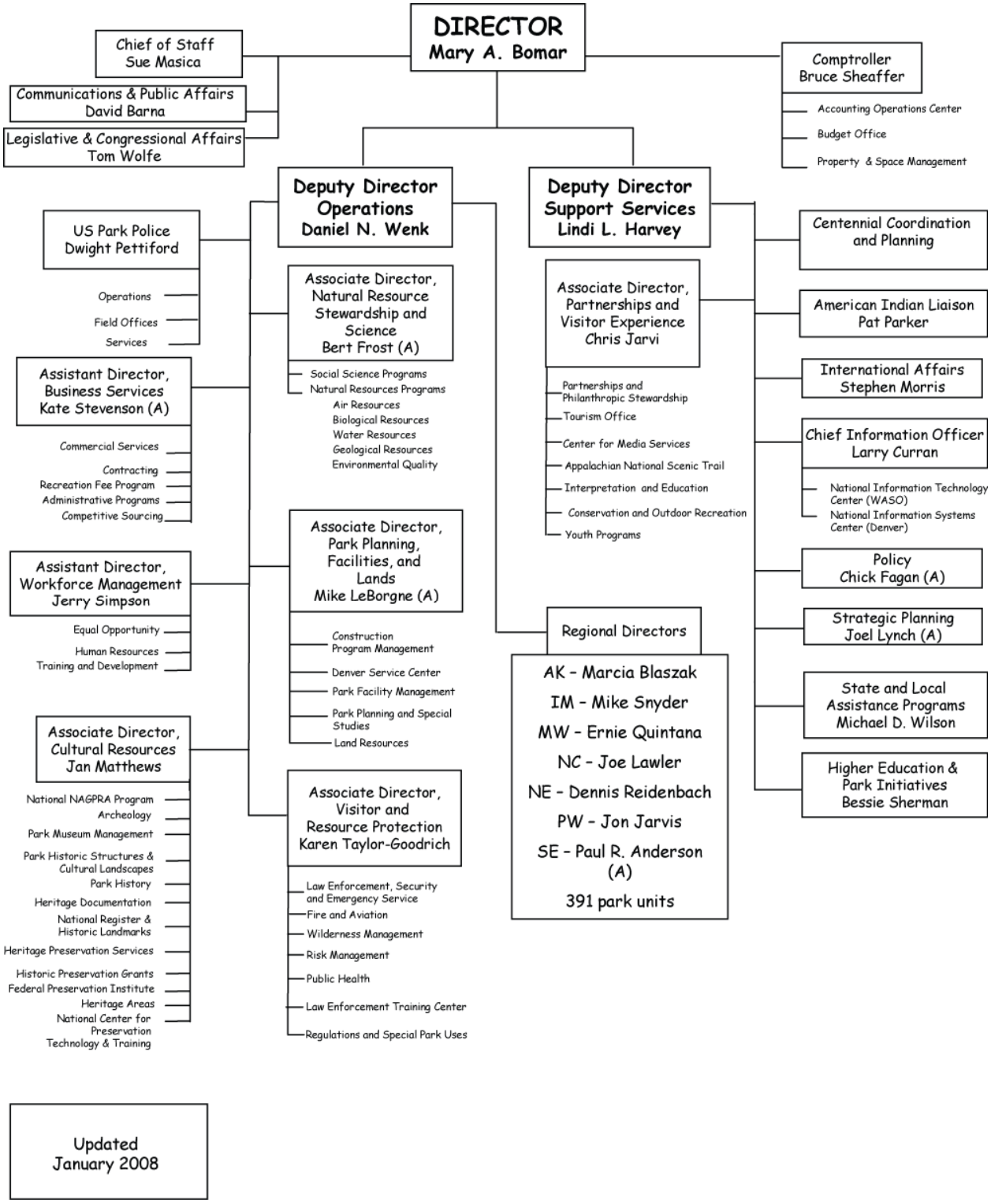
Goal/Measure	DOI/NPS GPRA goal	NPS goal	PART Measure	2007 Actual	2008 Target	2012 Target
(Ib2C and PART CR-5)						
Comments	This goal is reported by WASO Program in the Performance Management Data System (PMDS) and in OMB's PARTweb data system. This NPS goal tracts whether the park historic structures are adequately inventoried. The List of Classified Structures (LCS) is the official inventory of park historic structures in which the NPS has any enforceable legal interest. The inventory for a structure is considered adequate if the historic structure record is complete, accurate, and reliable.					
Condition of all NPS historic buildings as measured by a Facility Condition Index. (PART CR-8)			X	0.21	0.21	0.21
Comments	This goal is reported by the WASO program in OMB's PARTweb data system. This measures tracks only historical buildings. Condition ranges for FCI are NOT the same as those for determining the "condition" of cultural resources (Ia5 and PART CR-1). This PART measures tracks condition (physical condition only) of all historic buildings as measured by the Facility Condition Index (FCI).20 The average condition for FY2007 was 0.21. An FCI rating < 0.10 qualifies as good condition; 0.11 – 0.14 is fair; 0.15 – 0.49 is poor. Therefore, the current situation and target for 2012 means that the average FCI condition of NPS historic structures is well within the poor range. This does NOT mean the structures are in poor condition when rated for historic structures condition.					
Cultural Landscape Program						
Percent of the cultural landscapes in good condition (Ia7)	X			39.3% (336 of 856)	44.7% (372 of 833)	63.8% (532 of 833)
Comments	This goal is reported and certified by the park superintendants in the Performance Management Data System (PMDS). This goal accounts for all cultural landscapes that are 1) listed on or eligible for listing on the National Register of Historic Places, 2) landscapes that the park is legislated to preserve, and 3) landscapes for which it has been decided through the park planning process to be managed as a cultural resource. The PART measure (below) includes only those landscapes on the Cultural Landscapes Inventory (CLI).					
Percent of cultural			X	47.6% (191 of 401)	48%	50%

Goal/Measure	DOI/NPS GPRA goal	NPS goal	PART Measure	2007 Actual	2008 Target	2012 Target
landscapes in good condition (PART CR-4)						
Comments	This goal is reported by the WASO program in OMB's PARTweb data system. This PART measure includes only those landscapes on the Cultural Landscapes Inventory (CLI). The DOI/NPS GPRA goal (above) includes all cultural landscapes managed by parks.					
Cultural Landscapes Inventory records that have complete, accurate and reliable information is increased (Ib2B)		X		66 added (total 401)	Add 42 (total 443)	Add 42 (total 611)
Comments	This goal is reported by WASO Program in the Performance Management Data System (PMDS) This NPS goal tracts whether the parks cultural landscapes are adequately inventoried. The Cultural Landscapes Inventory (CLI) is the official inventory of park cultural landscapes in which the NPS has an enforceable legal interest.					
Archeological Program						
Percent of the recorded archeological sites in good condition (Ia8)	X			53.9% (27,606 of 51,222)	42.8% (28,344 of 66,260)	51.4% (34,060 of 66,260)
Comments	This goal is reported and certified by the park superintendants in the Performance Management Data System (PMDS). This goal accounts for all known and documented archeological sites that include 1) "archeological resources" subject to the Antiquities Act and Archaeological Resources Protection Act, 2) archeological sites that are determined eligible through consensus determination or are formally listed historic properties under the National Historic Preservation Act, and 3) archeological sites for which it has been decided through the park planning process to be managed as a cultural resource. The PART measure (below) includes only those archeological in the official database. The PART measure (below) reports only those archeological sites in the Archeological Sites Management Information System (ASMIS).					
Percent of the recorded archeological sites in good condition (PART CR-3)			X	40.2% (27,409 of 68,237)	40.5%	42.5%
Comments	This goal is reported by the WASO program in OMB's PARTweb data system.					

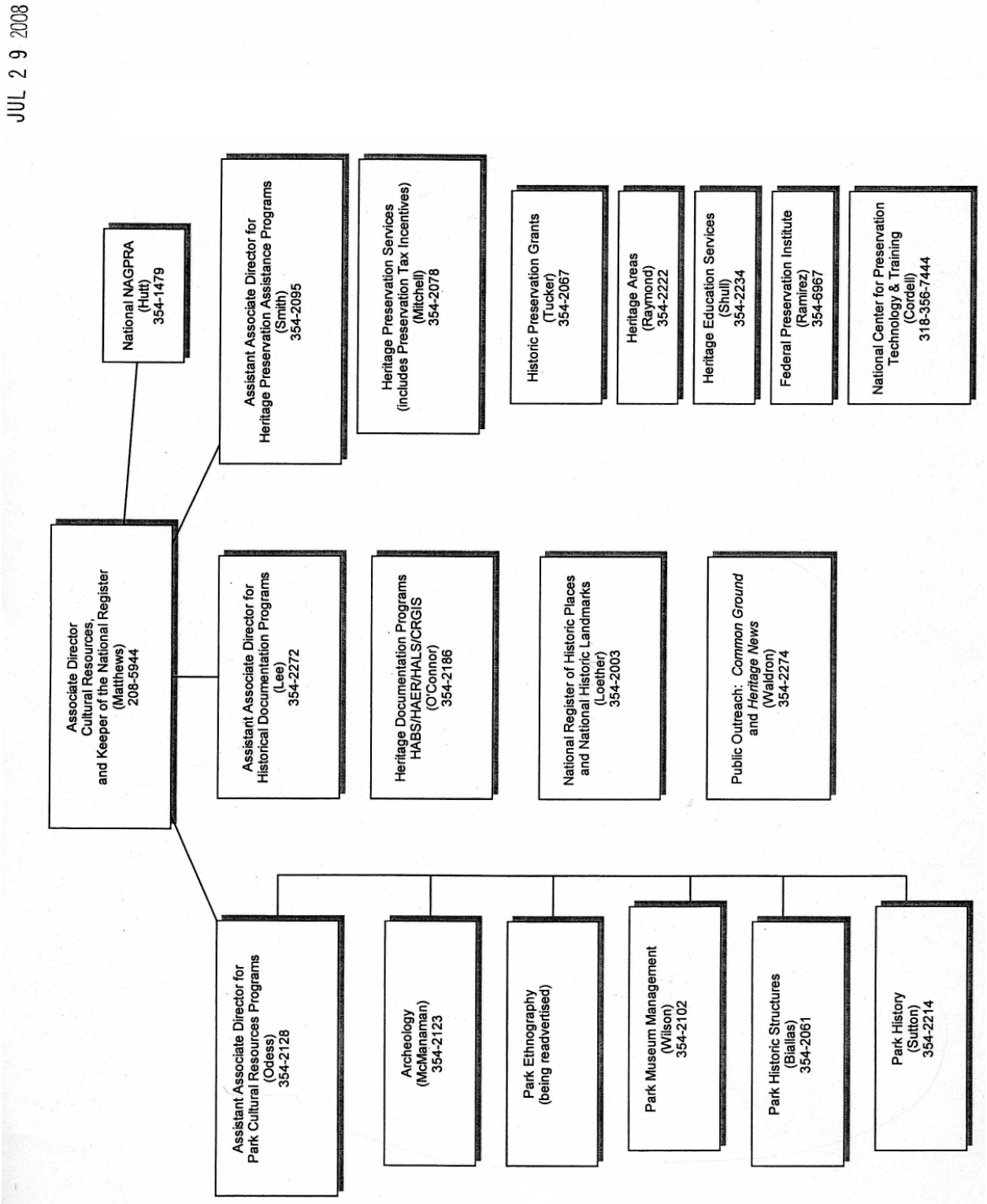
Goal/Measure	DOI/NPS GPRA goal	NPS goal	PART Measure	2007 Actual	2008 Target	2012 Target
	This PART measure includes only those archeological sites in the Archeological Sites Management Information System (ASMIS). The DOI/NPS GPRA goal (above) includes all archeological sites managed by parks.					
Additional NPS Archeological sites inventoried and evaluated (Ib2A)		X		1,072 added (total 68,237)	Add 900 (total 69,173)	Total 72,737
Comments	This goal is reported by WASO Program in the Performance Management Data System (PMDS) This NPS goal tracks whether the parks archeological sites are adequately inventoried. The Archeological Sites Management Information System (ASMIS) is the official inventory of park archeological sites in which the NPS has an enforceable legal interest. Sites must be known and documented to be entered in ASMIS.					
Museum Management Program						
Percent of NPS collections in good condition (Ia6A)	X			56.7% (185 of 326)	58.9% (192 of 326)	38% (222 of 326)
Comments	This goal is reported by WASO Program in the Performance Management Data System (PMDS) The WASO Program bases its report for this goal on information provided by each unit that houses a collection through goal Ia6 Museum Standards Met. If the unit owned or leased facility/facilities housing the collection meet more than 70% of the DOI standards, the collection is considered in good condition.					
Percent of preservation and protection standards met for park museum collections (Ia6)		X		75.9% (54,669 of 72,011)	74.9% (54,815 of 73,215)	77% (56,471 of 73,215)
Comments	This goal is reported and certified by the park superintendants in the Performance Management Data System (PMDS). Park unit, center and office use the Automated Checklist Program (ACP) in the Automated National Catalog System (ANCS+) to report on what planning, operational, facility and equipment standards are being met or not being met in each facility. The PART measure (below) reports only on those standards as reported in Automated National Catalog System (ANCS+) database. While the Ia6 and PART CR-2 are the same measure there maybe slight differences in data being reported by the parks in PMDS which may not yet be entered in to the ANCS+ by the time the program reports in OMB's PARTweb.					
Percent of preservation			X	73.9%	74.9%	78.9%

Goal/Measure	DOI/NPS GPRA goal	NPS goal	PART Measure	2007 Actual	2008 Target	2012 Target
and protection standards met at park museum facilities (PART CR-2)						
Comments	This goal is reported by the WASO program in OMB's PARTweb data system. These PART measure targets are based on the official database while park (NPS goal above) targets and reporting are based on work competed in the parks that may not yet be entered in ANCS database.					
Additional (and Percent) of NPS museum objects cataloged (and submitted to the National Catalog) (Ib2D and PART CR-6)		X	X	6.9 million added (total 67.3 million cataloged) 54.3%	2.04 added (total 69.4 million cataloged) 56.8%	total 77.5 million cataloged 66.8%
Comments	Ib2D goal is reported by WASO Program in the Performance Management Data System (PMDS) PART CR-6 is reported by the WASO program in OMB's PARTweb data system. Ib2D measures the annual servicewide increment in the number of cataloged objects submitted to the National Catalog of Museum Objects database while PART CR-6 represents the annual increment to the total number of objects.					
Cost to catalog a museum object (PART CR-7)			X	$0.81	$0.87	$0.81
Comments	This measure is reported by the WASO program in OMB's PARTweb data system. This PART measure is based on the quotient of the amount of backlog cataloging funding and the number of items cataloged.					

NATIONAL PARK SERVICE HEADQUARTERS ORGANIZATION



CULTURAL RESOURCES DIRECTORATE ORGANZATION



JUL 29 2008

PARK CULTURAL RESOURCES FUNDING OVERVIEW (FY2008 ENACTED)

Funds Dedicated to Cultural Resources **$103.6 M & 859 FTE**

Cultural Resources Applied Research $20.2 M &145 FTE

These project-based funds are administered by WASO, although WASO is not involved in project-level decisions. Funds are allocated among the regions based on 1990s resource-base formula. Regions review PMIS statements submitted by the parks, set priorities for funding, and identify the funding source. WASO reviews project reports and performance at the end of the year and reallocates funds (penalties and rewards) among the regions for the following year.

- CRPP Base ($6,435 K)
- CRPP Historic Structures Inventory ($988 K)
- CRPP Historic Structures Stabilization ($1,881 K)
- CRPP Historic Resources Studies ($793 K)
- CRPP Cultural Landscapes Inventory ($1,250 K)
- CRPP Archeological Resource Inventory ($2,249 K)
- Museum Management Program ($5,508 K)
- CRPP Museum Backlog Cataloging ($469 K)
- Ethnography Projects ($649 K)

Cultural Resources Management $83.4 M & 714 FTE

Except for $2.8 M and 20 FTE for WASO operations, all funds are Park Base. These funds cover core cultural resource program expenses in the parks, regions, and centers, including salaries and other operating expenses.

- Centennial Flexible Park Projects ($20.0 M Total) ($11. 4 M)

  20 percent Recreation Fee; projects selected based on specialized criteria
- Vanishing Treasures ($1.1 M)

  Projects selected based on specialized criteria

Other Sources of Funding for Park Cultural Resources **$122.8 M**

The following project-based funds that support park cultural resources come from other budget accounts. The regions select projects for funding based on the parks' requests using FMSS, PMIS, Choosing by Advantage, and the Attachment G process.

Facility Operations and Maintenance

- Cyclic Maintenance of Historic Properties (Cultural Cyclic) $14.7 M
- Historic Buildings Repair and Rehabilitation $2.4 M
- Repair and Rehabilitation ($78.0 M Total) $30.5 M
- Line Item Construction ($122.5 M Total) $23.5 M

Recreation Fee ($126.0 M Total) $45.4 M

80 percent dedicated to deferred maintenance

Centennial Challenge ($51.5 M Total) $6.3 M

Projects selected through specialized criteria

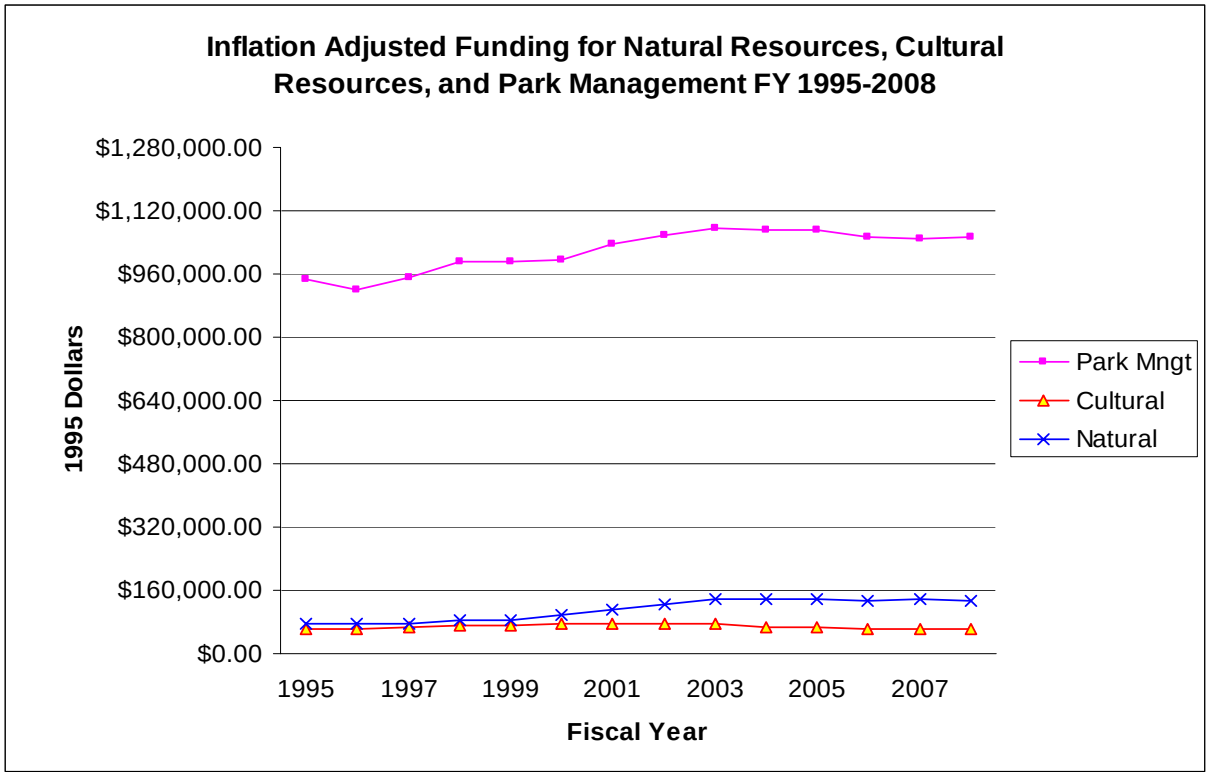
FUNDING FOR SELECTED NPS PROGRAMS
FY1995-2008

(Dollars in Thousands)

Years	*Enacted Funding*			Inflation Adjusted (1995 dollars)*		
	PM**	CR	NR	PM**	CR	NR
1995	947,393	63,688	76,785	947,393	63,688	76,785
1996	949,094	63,105	76,435	919,924	61,169	74,114
1997	1,014,617	69,608	81,008	952,254	65,353	76,189
1998	1,087,149	78,795	90,787	990,382	71,838	83,095
1999	1,130,422	82,057	94,231	989,292	71,909	83,135
2000	1,198,417	88,472	115,314	996,708	73,722	97,007
2001	1,293,665	95,465	138,053	1,035,792	76,606	112,014
2002	1,380,850	100,020	161,923	1,059,723	76,998	126,579
2003	1,456,799	101,477	180,187	1,074,511	75,123	135,830
2004	1,506,677	91,614	187,823	1,070,900	65,379	136,729
2005	1,564,801	94,726	196,298	1,071,203	65,117	137,745
2006	1,589,955	96,355	199,137	1,053,006	64,084	135,227
2007	1,628,142	99,123	205,657	1,050,796	64,239	136,032
2008	1,744,453	102,649	211,686	1,053,710	62,276	131,233

*Inflation adjustments are based on the actual increases in average salary and benefits provided by the NPS Comptroller's office and on the Consumer Price Index for other expenses.

**Increases in the Park Management account are primarily due to the emphasis areas of law enforcement and backlog maintenance and the Natural Resource Challenge.


Inflation Adjusted Funding for Natural Resources, Cultural Resources, and Park Management FY 1995-2008
$1,280,000.00
$1,120,000.00
$960,000.00
$800,000.00
$640,000.00
$480,000.00
$320,000.00
$160,000.00
$0.00
1995 Dollars
1995
1997
1999
2001
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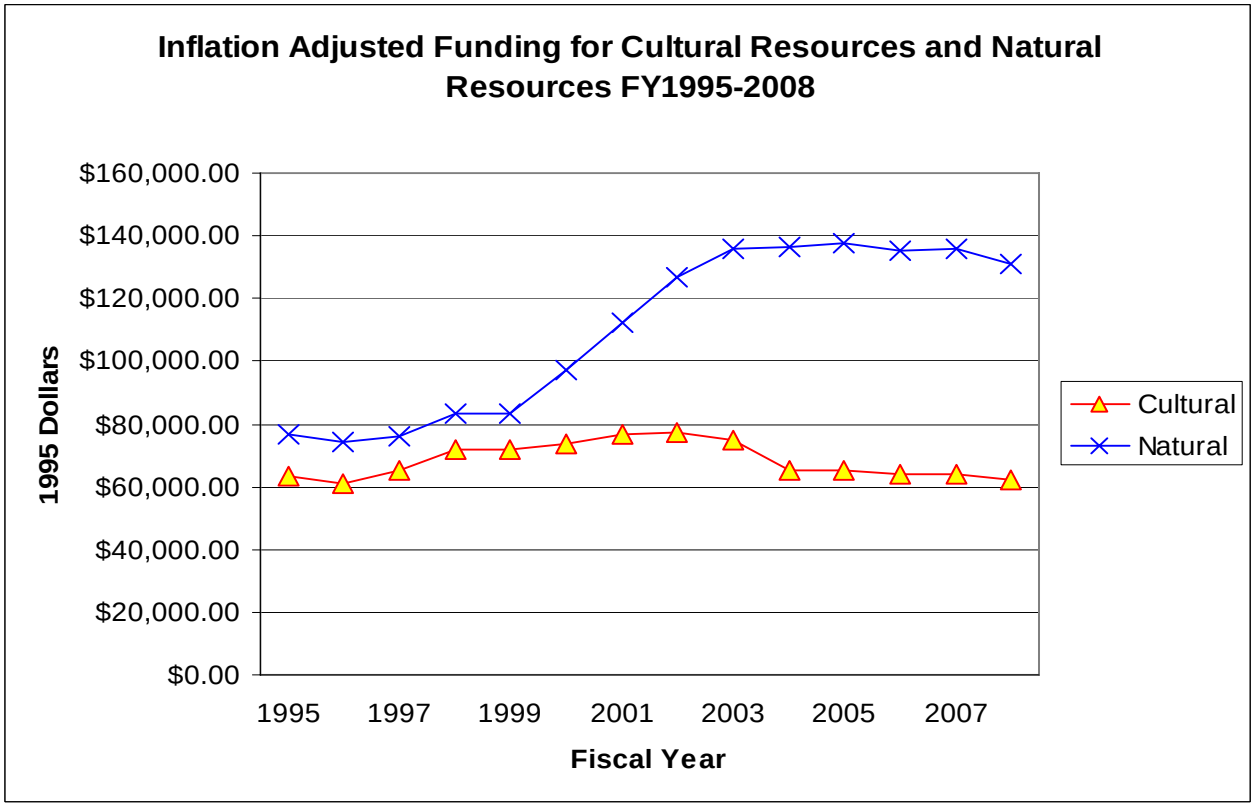
2005
2007
Fiscal Year
Park Mngt
Cultural
Natural


Inflation Adjusted Funding for Cultural Resources and Natural Resources FY1995-2008
$160,000.00
$140,000.00
$120,000.00
$100,000.00
$80,000.00
$60,000.00
$40,000.00
$20,000.00
$0.00
1995 Dollars
1995
1997
1999
2001
2003
2005
2007
Fiscal Year
Cultural
Natural

OVERVIEW OF THE NATURAL RESOURCE CHALLENGE

This appendix provides an overview of the Natural Resource Challenge, based on information provided by the National Park Service's Natural Resource Stewardship and Science Directorate.

Objectives

- Parks for science and science for parks
- Complete basic inventories and monitor the most critical resources and trends
- Each park can understand its resources and speak credibly about them
- Share information about park resources broadly
- Eliminate the most critical mitigation problems

Key Elements

- Complete 12 basic inventory data sets for 270 parks with significant natural resources
- Establish 32 Inventory and Monitoring Networks
- Establish Research Learning Centers
- Participate in all 17 Cooperative Ecosystem Studies Units (CESU)
- Establish Exotic Plant Management Teams to cover major park areas

Results

- Over 70% of the basic inventories for the 270 parks have been completed.
- All 32 monitoring networks are fully funded and are monitoring a selected suite of vital signs (page 56 in Report to Congress for types of vital signs being monitored)
- 12 Research Learning Centers were established through Challenge funding. Since then 5 additional Centers have been created through efforts at the Region or Park level. NPS is continuing to strive to achieve the original goal of 32 Research Learning Centers.
- NPS is a member of all 17 Cooperative Ecosystem Studies Units, which gives parks easy access to the professional expertise and faculty of over 200 major universities across the country. An NPS staff person is duty stationed at 15 of theses units; the salaries and support for 12 of those staff resulted directly from the Natural Resource Challenge.
- 16 Exotic Plant Management teams have been created and are stationed in parks throughout the country and support the work of networks of parks in their regions. Over 59,000 acres of lands with exotic plants have been controlled.
- 15 water quality specialist positions, which have been funded through the Challenge, are duty stationed at parks to work on park and regional water issues.

Funding

During the period FY2000-FY2007, NPS received additional appropriations for the Natural Resource Challenge totaling $77.5 million. NPS' FY2006 Report to Congress summarized how

these funds were used to meet critical elements and objectives of the Natural Resource Challenge, including base increases to hire staff and meet critical needs in 36 parks.[30]

During the Challenge years, additional funding was received that was not part of the Challenge. This included support of the National Cave and Karst Institute, Everglades Comprehensive Restoration Plan, GIS Program, Glen Canyon Adaptive Management Program, and the Natural Sounds Program, funded to do Air Tour Management Plans.[31]

Positive Impact

Although the NPS ultimately received only about three-quarters of the $100 million originally envisioned for the Natural Resource Challenge, the additional funds received greatly improved the ability of the NPS to make reliable scientific information available to support better informed decision-making. The additional resources from the Challenge also helped to prepare NPS to begin to address critical new issues, such as climate change. Without the basic inventories and baseline data currently being collected as a result of the Challenge, the NPS would be hard pressed to address these issues.

NPS field staff's assessment of the Natural Resource Challenge is overwhelmingly positive. Recent survey responses of field staff's experience with the Vital Signs Network drew high praise for the quality of the work conducted and its positive impact on NPS' stewardship of natural resources.

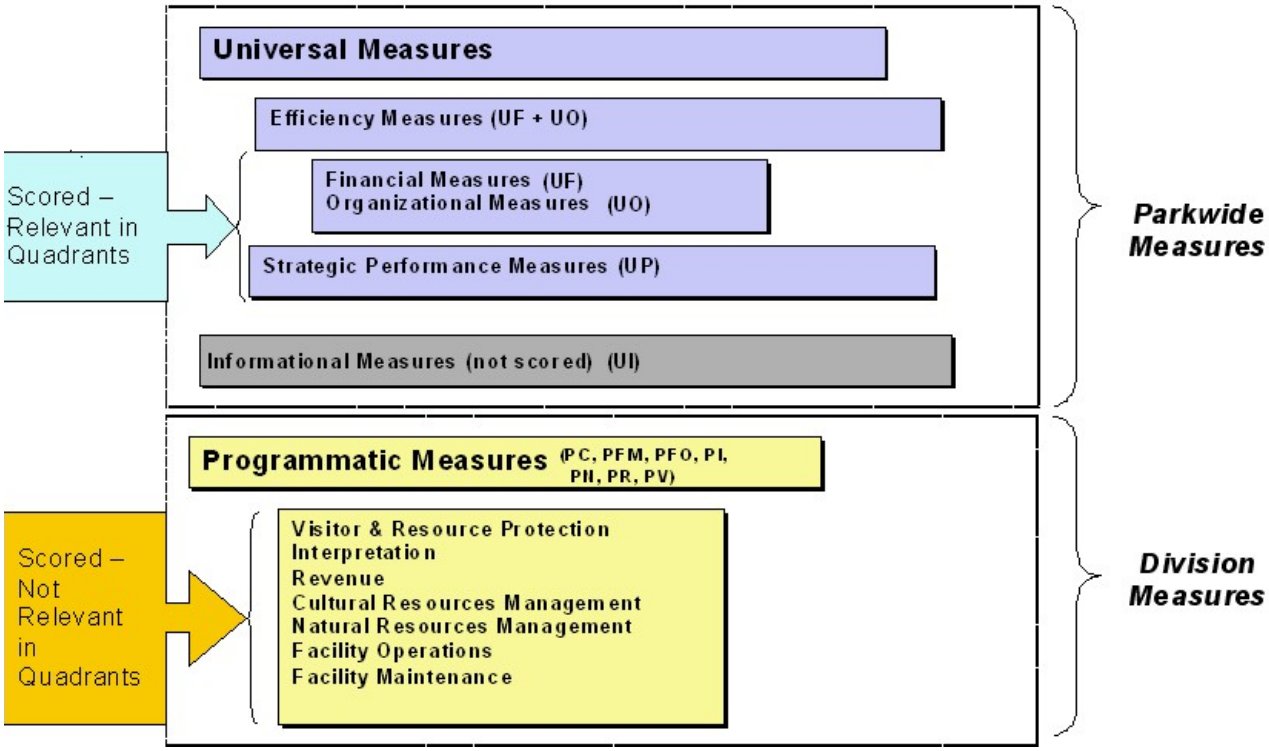
[30] National Park Service, Department of the Interior, *Funding for the Natural Resource Challenge, Report to Congress, FY2006*, 65-67, 77. (Washington, DC: August 2006)
[31] Ibid., p. 7.

STAFFING LEVELS FOR SELECTED NPS PROGRAMS FY1995-2007

Fiscal Year	Park Management*	Cultural Resources	Natural Resources
1995	15,548	1,079	1,072
1996	14,997	1,023	1,045
1997	15,189	1,035	1,060
1998	15,638	1,088	1,133
1999	15,919	1,107	1,164
2000	15,417	991	1,147
2001	15,737	1,044	1,262
2002	15,865	1,043	1,397
2003	15,740	1,030	1,459
2004	15,419	958	1,405
2005	15,534	932	1,426
2006	14,997	912	1,394
2007	14,595	859	1,387
2008	15,161	785	1,407
Change in FTE, 1995-2007	-387	-294	+335
Percent Change in FTE, 1995-2007	-2.5%	-27.2%	+31.2%

***Includes approximately 1,500 FTE for law enforcement since the terror attacks on September 11, 2001.**

NPS SCORECARD MEASURES



Financial Measures

Base Labor as a % of Gross Base Obligations
Fleet Count per FTE
Overhead $ as a % of Total Gross Obligations
Gross Base Obligations as % of total Gross obligations
% Change in Based Fixed Costs (5 Years)
4th Quarter Base Obligations as % of Gross Base Obligations (Non-Labor)

Organizational Measures

% Change in Non-Based Funded FTP (5 Years)
Ratio of Volunteers to Total Park FTE
FTP as % of Total FTE
Span of Control

Strategic Performance Measures

Visitor Understanding
Visitor Satisfaction
% LCS Structures in Good condition
% Museum Standards Met
FCI of High Priority Facilities
% Invasive Plant Species Areas Controlled
Injuries/accident per 100K Recreational Visits
Employee Safety

Informational Measures

Total FTE
General Management Plan Completed
Core Operations Review Completed
Business Plan Completed
Recreational Visits
5 Year Based Funding % Change
Average GS Grade
Average Wage Grade
Overall FCI
Total Gross Obligations
Gross Labor Obligations
5 Year Based Funding % Change
Expenditure Transfers
Overtime as a % of Labor Costs
% Change in Average GS Grade (5 Years)
% Change in Wage Grade (5 Years)
% of GPRA Goals Achieved
Growth of Recreational Visits (10 Years)
% Disturbed Lands Restored

Programmatic Scorecard Measures

<u>Cultural Resources Management)</u>
Overtime $ as % of Labor Costs
Ratio of Volunteers to Division FTE
Permanent Staff as % of Total Staff
% Change in Based Funded FTP (% Years)
% Change in Base Funded OTP (5 years)
Labor Costs as % of Base
% LCS Structures in Good Condition
% Archeological Sits in Good Condition
% Museum Standards Met

CR Base $ as % of Total Base

Facility Maintenance
Overtime $ as % of Labor Costs
Facility Maintenance Building $ per SQ/FT
Ratio of Volunteers to Division FTE
Permanent Staff as % of Total Staff
Ratio of Facility Maintenance to CRV
% Change in Based Funded FTP (5 Years)
% Change in Based Funded OTP (5 Years)
Labor Costs as % of Base
FCI of High Priority Facilities
Visitor Satisfaction with Park Facilities
Facility Maintenance Base $ as % of Total Base

Facility Operations
Overtime $ as % of Labor Costs
Ratio of Volunteers to Division FTE
Permanent Staff as % of Total Staff
Energy Used per SQ/FT
Ratio of Facility Operational Maintenance Obligations to CRV
% Change in Base Funded FTP (5 Years)
% Change in Base Funded OTP (5 Years)
Labor Costs as % of Base
Facility Operations Building $ per Building SQ/FT
Visitor Satisfaction with Park Facilities
Facilities Operations Base $ as % of Total Base

Interpretation
Overtime $ as % of Labor Costs
Interpretation Base $ per Visitor
Ratio of Volunteers to Division FTE
Permanent Staff as % of Total Staff
% Change in Based Funded FTP (5 Years)
% Change in Based Funded OTP (5 Years)
Labor Costs as % of Base
Interpretation Base $ as % of Total Base
Seasonal Interpretation Staffing Flexibility
Visitor Understanding
Interpretive Contacts per Visitor
Visitor Satisfaction with Visitor Services

Natural Resource Management
Overtime $ as % of Labor Costs
Ratio of Volunteers to Division FTE
Permanent Staff as % of Total Staff

% Change in Based Funded FTP (5 Years)
% Change in Based Funded OTP (5 Years)
Labor Costs as % of Base
% Invasive Plant Species Areas Controlled
% Reduction in Invasive Animal Species
% Disturbed Lands Disturbed
NR Base $ as % of Total Base
% of Threatened and Endangered Species Improving

Revenue
Revenue per Visitor
Ratio of Donations to Base Budget
Donations per Visitor
Ratio of Revenue Collected to Base Budget
Cost of Collection

Visitor and Resource Protection
Overtime $ as % of Labor Costs
Ratio of Volunteers to Division FTE
Permanent Staff as % of Total Staff
Visitor and Resource Protection Base $ per Visitor
% Change in Base Funded FTP (5 Years)
% Change in Based Funded OTP (5 Years)
Labor Costs as % of Base
Visitor and Resource Protection Base as % of Total Base
Injuries/Accident per 100K Recreational Visits
Visitor Satisfaction with Visitor Services

CRITERIA FOR PRIORITIZING HISTORIC STRUCTURES' TREATMENT

NPS' systems recognize that park historic structures differ in their significance. The criteria that LCS and FMSS use to prioritize the significance of structures/assets are summarized below.

LIST OF CLASSIFIED STRUCTURES

The LCS contains a data element called **Management Category** that represents the park Superintendent's evaluation of whether or not a structure should be preserved and maintained using the following categories and criteria, which are based on the significance, use, condition and location of the structure:

Category A: Structures that must be Preserved and Maintained

A structure meeting <u>any</u> of the following criteria must be classified in Category A:

- the structure's preservation is specifically legislated;
- the structure is related to the park's legislated significance;
- the structure is nationally significant as defined by the National Historic Landmark criteria;
- the structure is less that nationally significant, but contributes to the park's national significance; or
- the structure is a prehistoric structure.

Category B: Structures that should be Preserved and Maintained

A structure must meet <u>all</u> of the following criteria individually in Category B (failure to meet any of the conditions moves it to a lower category):

- the structure may meet the National Register criteria individually or as contributing element of a site or district;
- the structure is not incompatible with the park's legislated significance; and
- the structure has a continuing or potential use based upon design and location.

Category C: Structures that may be Preserved or Maintained

<u>Either</u> of the following conditions places a structure in Category C:

- the structure may meet the National Register criteria individually or as a contributing element of site or district, but because of condition, location or other factors does not qualify for Category B; or
- the structure does not meet the National Register criteria, but a decision has been reached through the planning process to manage the structure as a cultural resource.

Category D: Structures that may be or have been disposed of; altered for some other management purposes; or have been destroyed by natural forces or by accident

A structure that meets any of the following criteria may be placed in Category D:

- the structure is an irreparable hazard to public health and safety;
- the structure has lost its historical integrity;
- the structure is a physical or visual intrusion on the park's legislated significance; or
- the structure has been disposed of by planned action or destroyed by natural forces, or accident.

FACILITY MANAGEMENT SOFTWARE SYSTEM

Similarly FMSS contains a data element called the **Asset Priority Index (API)** that represents the park Superintendent's evaluation of the value of an asset in relation to the mission of the park. The API along with the Facility Condition Index (FCI) are used to make facility funding decisions. The criteria for category 2b Cultural Resource Preservation, which is one of six API categories, are the same as that used for LCS Management Category:

2b Cultural Resource Preservation

High: Asset meets any of the following criteria:

- the asset's preservation is specifically legislated;
- the asset contributes to the park's legislated national significance;
- the asset is nationally significant as defined by the National Historic Landmark criteria and has been declared by the Secretary to be a National Historic Landmark;
- the asset is less than nationally significant, but relates to the park's national significance;
- the asset is a prehistoric asset; or
- the asset directly supports cultural resource preservation and protection.

Medium: Asset meets all of the following first three criteria or one of the last two:

- the asset is of state or local significance and meets the National Register criteria individually or as a contributing element of a site or district;
- the asset is not incompatible with the park's legislated significance; and
- the asset has a continuing or potential use based on design and location; or
- the asset indirectly supports cultural resource preservation and protection; or
- the asset limits the impact of visitor use on a cultural resource where the threats from visitor use can degrade a unique, endangered, or rare asset, and the restoration and recovery efforts are extensive/impossible.

Low: Asset meets <u>any</u> of the following criteria:

- the asset is of state or local significance and meets the National Register criteria individually or as a contributing element of a site or district, but because of location or other factors does not qualify for Medium; or
- the asset does not meet the National Register criteria, but a decision has been reached through the park planning process to manage the asset as a cultural resource; or
- the asset limits the impact of visitor use on a cultural resource where threats from visitor use can cause limited degradation to a resource that is important to the park or the region, and limited restoration operations will be required.

NATIONAL ACADEMY OF
PUBLIC ADMINISTRATION®

900 7th Street, N.W.
Suite 600
Washington, DC 20001-3888
Phone: (202) 347-3190
Fax: (202) 393-0993
Web: www.napawash.org