



# United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.  
Washington, DC 20240

H36(2256)

## Memorandum

JAN 12 2015

To: Tribal Historic Preservation Officers and staff

From: Hampton Tucker, Chief, State, Tribal and Local Plans and Grants

Re: Notification of Federal and Programmatic Changes to the Historic Preservation Fund (HPF) Grants to Tribal Historic Preservation Offices (THPOs) starting in Fiscal Year 2015

### Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule

On December 26<sup>th</sup>, 2014, the Office of Management and Budget (OMB) released **2 CFR 200**, the revised Federal awards circular that streamlines eight previous award circulars into a single policy covering Uniform Administrative Requirements, Cost Principles, and Audit Requirements to States, Tribes, Educational Institutions and Nonprofits. As of December 27, 2014 the guidance under 2 CFR 200, formally took effect on all funding agreements awarded on or after that date.

2 CFR 200 eliminates duplicative and conflicting guidance, provides for consistent and transparent treatment of costs, and limits allowable costs to make the best use of Federal resources. One example of this is that the requirement for a single audit threshold was increased from \$500,000 to \$750,000 (this means that a Tribe now must expend \$750,000 in Federal funds, from all combined Federal sources, in a single fiscal year, before it's required to complete a single audit).

The National Park Service (NPS) has not had sufficient time to go through and identify changes that may affect THPO HPF grantees. However, as with all OMB requirements, it is the tribe's responsibility to refer to the current guidance ensuring that it is in compliance with current laws. A full printout of the new circular can be downloaded from the General Printing Office's website:

<http://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf>.

### Federal Grant Award Language

In December of 2014, NPS adopted standardized language for all cooperative and grant agreements. The Fiscal Year (FY) 2015 THPO HPF grants, and future grants, will reflect the standardized language required by NPS, but will also include additional programmatic requirements that are specific to the THPO HPF program.

Please read through all of the language included in your grant agreements to ensure that you fully understand the terms and conditions in accepting the HPF grant funds.

## HPF Programmatic Changes to THPO HPF Grants

As per to the new guidance listed above, we have made a couple of programmatic changes to the requirements of the THPO HPF operations grants, including:

1. A *Budget Narrative* must be submitted as part of the grant application, explaining and supporting the expenses listed in the application budget form(s) – SF424a and SF424c. Guidance for writing the budget narrative is included in the HPF THPO grant instructions attached to the grant opportunity on Grants.gov and in the updated *2015 THPO Grant Quick-Guide* (which can be downloaded from the THPO grant website: <http://www.nps.gov/thpo/grants/index.html>).
2. Changes to Reports on Equipment Purchases. An SF428A, *Tangible Personal Property Annual Report* must be submitted with each Annual Report, even if no equipment was purchased under the grant. You may simply write “no equipment purchased” on the form if no equipment was purchased.

An SF428B, *Final Tangible Personal Property Form* must be submitted with all Final reports. This form is to be used by recipients to provide a final property report for the closeout of Federal assistance awards. The form allows recipients to request specific disposition of Federally-acquired equipment.

## Re-examining the THPO Apportionment Formula

Beginning in FY 2015, NPS will begin the process of re-examining, and possibly revising, the current formula used to apportion the HPF funds to THPO. The current formula was developed in 2004 in consultation with THPOs, and is as follows:

Approximately 81% of the total appropriation is divided equally among all THPOs and the remaining 19% is apportioned based the area of Tribal lands as defined in the National Historic Preservation Act.

Based on comments from THPOs and NATHPO over the past few years, NPS will again work with THPOs to determine if the current formula is appropriate, and if not, develop a new formula that addresses the current and future situations.

The goal is to have this process completed in FY 2016 so that the newly approved formula can be implemented for use in the FY 2017 HPF apportionment. All THPOs will have an opportunity to voice their opinions regarding the proposed formula.