Historic Preservation Fund (HPF) Grants to Indian Tribes, Alaskan Natives and Native Hawaiian Organizations aka Tribal Heritage Grants

Managing Your Grant
Historic Preservation Fund

• Established in the 1976 amendments to the National Historic Preservation Act (the Act), the Historic Preservation Fund (HPF) is the source of preservation grants and financial assistance to states, Tribes, local governments, and non-profits. The Act allows states and Tribes to participate in the National Historic Preservation Program by appointing a State or Tribal Historic Preservation Officer (SHPO/THPO) to perform, or have performed, survey, document, and record historic properties and guide preservation activities at the State and Tribal levels. The HPF provides the money necessary for states and Tribes to implement these activities. The funds are administered by the National Park Service (NPS).

• Tribal Heritage grants are derived from the THPO funds so that all federally-recognized tribes, Alaskan Tribal Groups & Hawaiian Native groups can benefit.

• Funding for the HPF is from offshore oil and gas lease revenues. This allows for the use of non-renewable resources to be somewhat counter-balanced by the benefits of preserving other irreplaceable resources.
Your Grant Agreement & Requirements

- Requirements – Most requirements are listed in the grant agreement.

- **Website.** You can find most of the information on the website on how to manage your grants. [https://www.nps.gov/thpo/tribal-heritage/reports-manual.html](https://www.nps.gov/thpo/tribal-heritage/reports-manual.html)
Agreement Requirements

Interim Report

a) Due every six months
b) Detailed narrative
c) Photographs
d) Any drafts due
e) SF425

Dates.

a. listed in the grant agreement
   - April 30, 2018;
   - October 31, 2018;
   - April 30, 2018
   (reporting period is month before).
Include:

- Progress on project
- Any problems
- What has been accomplished
- What still needs to be completed
- Any requests to the grant agreement – budget, scope, extension, etc. (There is a table to fill out for the budget change)
- Drafts, approvals
- Photos!
- Be sure to sign it.

If your project involves construction:

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

-Do not worry about supplying the ASAP draw down.

-Email the reports to: Madeline_Konz@NPS.gov
1. Must submit with Interim/Final Report
   • If charging indirect costs must be on SF425

2. Have correct reporting dates as will be listed in the grant agreement.
SF425 – Instructions (Fields 1 - 9)

- Enter the Tribe’s name and address.
- Enter National Park Service
- Enter the Grant Agreement # assigned by the Federal Agency
- Enter the number of pages included in the report – usually one.

Recipient Organization A, 123 Main Street, Anytown, XX 12345

123456789
12-3456789
123456789
12-3456789

This is the start date of grant agreement.
This field is optional and for the recipient's use only.
This is the end date of the grant agreement.
Indicate the report type.
The reporting period end date as listed in your grant agreement for Interim reports.
Indicate the recipient’s basis of accounting.

SF425– Instructions (Fields 1 - 9)
**Field d - Total grant award amount.**

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

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

<table>
<thead>
<tr>
<th>Federal Expenditures and Unobligated Balance</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>d. Total Federal funds authorized</td>
<td>40,000.00</td>
</tr>
<tr>
<td>e. Federal share of expenditures</td>
<td>5,000.00</td>
</tr>
<tr>
<td>f. Federal share of unliquidated obligations</td>
<td>0</td>
</tr>
<tr>
<td>g. Total Federal share (sum of lines e and f)</td>
<td>5,000.00</td>
</tr>
<tr>
<td>h. Unobligated balance of Federal funds (line d minus g)</td>
<td>35,000.00</td>
</tr>
</tbody>
</table>

**Balance.** Funds not yet spent from grant total

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

Also be sure that if you are charging Indirect Costs to the grant on your budget, that it is also on the SF425 box 11.a-g. and vice versa, if they appear on SF425, make sure they are on the budget. You must also submit an Indirect cost rate agreement.
Final Report

• Requirements:
  – Final Report Worksheet
    • Answer all questions
    • Final Budget
    • Complete narrative
    • Deliverables
    • Must have met objectives in the Scope of Work
  – SF425
    • No balances!
Payment

• Reimbursable grant
  – As funding is expended on the project, you may drawdown that amount.
  – Full drawdown is not allowed

• ASAP
  – Grantee must be enrolled in ASAP even if already enrolled with other agency.
    – https://www.asap.gov
    – https://www.nps.gov/preservation-grants/asap-info.html
HPF Manual


- **HPF Program-Specific Requirements** - HPF program requirements are provided in the *Historic Preservation Fund Manual*. The chapters below provide information that THPOs will find especially useful in managing their grants.
• **Chapter 6 – *Grant Assisted Program Activities*** - This Chapter describes overall program objectives and eligible and non-eligible program activities for the various HPF Program Areas as specified in the National Historic Preservation Act, as amended.

• **Chapter 13 – *Standards for Allowability of Costs*** - This Chapter provides standards for determining the allowability of selected items in accordance with Office of Management and Circulars (*the HPF Manual may be outdated so please check with the 2 CFR 200 for current information*). It also includes additional cost items specific to the Historic Preservation Fund program.
Common Unallowable Costs

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

• **Indirect Costs** - Costs incurred for a common or joint purpose benefiting more than one cost objective, and *not readily assignable to the HPF grant* without effort disproportionate to the results achieved.

• Indirect costs and administrative costs added together **may not total more than 25%** of total budget.
Procurement

- Contractors and consultants must be competitively bid – 2 CFR 200, Uniform Administrative Requirements and Cost Principles for Federal Awards.
- Single source bidding has a very high standard.
- All contractors and consultants must be approved by NPS and must meet qualification standards as listed in your grant agreement.
- Maximum hourly wages charged to this grant for personnel and consultants may not exceed 120% of the salary of a Federal Civil Service GS-15, Step 10.

Management website: https://www.opm.gov
Budget & Statement of Work

• Budget and statement/scope of work are in your grant agreement – Budget (Article VI) & Statement Of Work (Article III).

• Changes can be made to both.

• **Budget** – contact NPS if more than 15% and include explanation and a new budget (*Use the Interim report or submit a SF424a form*).

• **Scope change** – contact NPS with explanation and proposed change and timeline.
Extensions

• Grant period is 2 years.

• Extensions are allowed under certain circumstances.

• Request in Interim Report or Contact NPS.

Your work is supposed to take two years, however, we understand things come up. If you think you are running into problems note it in the Interim report or contact me and we will work with you to see what can be done. NPS wants your project to be successful, so if changes need to be made, we will work with you to make that happen. Contact us.
Deliverables

- Article IX.B.3.iii of grant agreement lists the project deliverables.

- Due with the Final Report.

- Drafts due prior to Final Drafts of any plans, surveys, brochures etc. must be sent prior to use or publications, for approval.

Each Tribe’s deliverables are different, however, most include a detailed report describing the project and process, as well as who, what, when & where information. You should also include photos and any publications. NPS needs this information to:

1. report to Congress that these programs are important and necessary;
2. promote & educate the public who in turn request these programs to Congress. Without funding authorization each year from Congress these programs won’t continue.

Drafts of any plans, surveys, brochures etc. must be sent prior to use or publications, for approval.
Projects

Construction (Development)

- Section 106 and NEPA Compliance Requirements
  - Consultation process – Repair projects require NPS review of all plans and specifications of proposed work for compliance with the Secretary of the Interior’s Standards for the Guidelines for Archeology & Historic Preservation, with Section 106 of the National Historic Preservation Act (NHPA), and the National Environmental Policy Act (NEPA) prior to any work commencing.

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

  - Similarly, NEPA requires that federal agencies review all federally-funded work for potential environmental adverse effects.
    - NEPA Form
Construction Cont.

- **Secretary of Interior’s Archeological Documentation Standards.**

- **Secretary of Interior’s Standards for the Treatments of Historic Properties**

- All Plans & Specs and repair work must meet **The Standards** and be submitted to NPS for review and approval prior to commencement of work.

- Project Sign
Survey and Inventory

- Secretary of the Interior’s Standards for the Guidelines for Archeology & Historic Preservation

- All surveys must be conducted, supervised, reviewed, or verified by a person(s) from the appropriate discipline who meets the Secretary of Interior’s Professional Qualification Standards. For example, an archeologist is needed for an archeological survey project while a traditional cultural authority, recognized by the Tribe, is needed for a survey of traditional cultural properties.
Oral Histories


- Work must be conducted, supervised, reviewed, or verified by a person who meets the *Secretary of Interior’s Professional Qualification Standards*.

- All projects should have an identified audience, a clear plan for outreach and dissemination, and be related to an overall plan for how the research and documentation will be used either as part of this project or in the future.
Publications

• All drafts must be approved by NPS
• Disclaimer/Acknowledgment
  (Grant agreement – Article IX.D.1.)
  "This material was produced with assistance from the Historic Preservation Fund, administered by the National Park Service, Department of the Interior. Any opinions, findings, and conclusions or recommendations expressed in this material are those of the author(s) and do not necessarily reflect the views of the Department of the Interior."
• Right to republish/photos – Provide citations and photographer
Fiscal Responsibility

- Default, Reporting Issues, and Failure to Meet Objectives.

- Federal Awardee performance and Integrity Information System (FAPIIS), and/or past performance on previous federal financial assistance awards.

- Future Award

- Auditing

Keep records!
It is the Tribe’s responsibility to spend funding correctly.

NPS may require backup information if deemed necessary.

Can affect THPO awards as well as any other federal funding including NAGPRA and other grants outside of NPS.

NPS is now required to enter information into FAPIIS – FAFADA.
References

- Secretary of the Interior’s Standards for the Treatment of Historic Properties
- Secretary of the Interior’s Archeological Documentation Standards
- NPS Technical Preservation Briefs – recommended methods and approaches for rehabilitating historic buildings.
- Citizen's Guide to Section 106 review
- NEPA review process
- Contact your State Historic Preservation Office
- 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- Tribal Heritage Grant Web site
Contacts

Madeline Konz
Grants Management Specialist
State, Tribal, and Local Plans and Grants Division (STLPG)
National Park Service
1201 Eye St. NW (2256)
Washington, DC 20005

Madeline_Konz@NPS.gov
202-354-2064 phone

Chief – STLPG div.
Megan Brown
Megan_Brown@nps.gov