

# HPF GRANTS MANUAL



Historic Preservation Fund Grants:  
A Program of the U.S. Department of the Interior  
National Park Service



Administered by the  
Government of the District of Columbia  
Office of Planning  
Historic Preservation Office

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*(HPF Grants Manual updated October, 2008)*

## INTRODUCTION

This Grants Manual is designed to provide information to those who have received or are applying for Federal Historic Preservation Fund (HPF) grant assistance from the District of Columbia's Historic Preservation Office (HPO). The Federal Government considers the District of Columbia to be the recipient of these funds and, therefore, the **grantee**. Those who receive HPF funds through the HPO are **subgrantees**, and will be referred to as such throughout this manual.

Subgrantees are responsible for abiding by:

- All of the requirements spelled out in their agreement package;
- District and Federal accounting standards; and
- The instructions contained in this *Grants Manual*.

Subgrantees are urged to review the information contained in the *Grants Manual* thoroughly. While the HPO strives to bring every project to a successful conclusion, failure on the part of the subgrantee to adhere to grant standards can result in the reduction or cancellation of the funding offer. The HPO's Grants Specialist is available to answer questions regarding the subgrantee's and HPO's responsibilities.

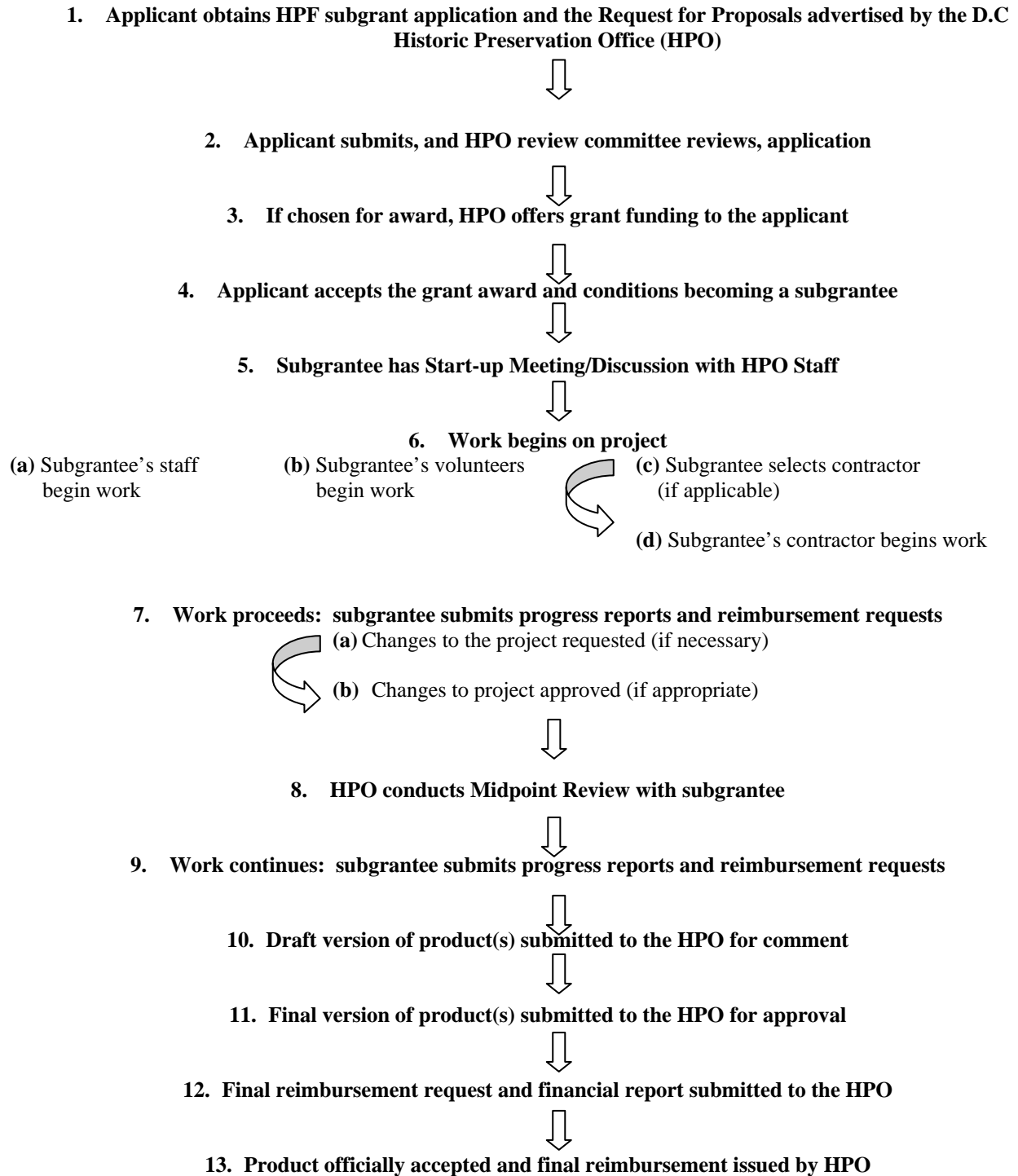
This manual is designed around the enclosed 14-step flow chart that shows the grant process from the preparation of a grant application, through to awarding of funds, to the completion of the project.



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# COMPLETING AN HPF SUBGRANT PROJECT



## **PART I: THE GRANT PROCESS STEP BY STEP**

### **STEP 1: Receiving and Reviewing the Grant Application and Request for Proposals (RFP)**

Applicant obtains and reviews HPF grant applications and the HPO's Request for Proposals.

Each year, the National Park Service awards monies from the Historic Preservation Fund to each State and the District of Columbia in the form of a grant. HPF grants are meant to provide partial financial support to the State Historic Preservation Offices for carrying out their responsibilities under the National Historic Preservation Act. When the budget allows, the DC Historic Preservation Office (HPO) sets aside a portion of its HPF grant to award as matching subgrants and contracts. These subgrants are awarded to projects that assist the HPO in meeting its priorities or projects that foster public participation in the identification and protection of the District's historic resources.

### **STEP 2: Submitting the application for review by the HPO review committee**

The prospective applicant submit one original and two copies of all required forms and materials to the Historic Preservation Office by the date indicated in the application package.

A review committee, formed by the State Historic Preservation Officer, reviews all accepted applications and rates them according to the criteria listed in the application package.

### **STEP 3: D.C. Historic Preservation Office (HPO) Offers Grant Funding**

The staff of the Historic Preservation Office (HPO) often advise applicants of the committee's decisions for planning and scheduling purposes, however, subgrant award offers are not official until the HPO sends the subgrantee an award agreement with project-specific conditions. The award agreement will be accompanied by other documents that are considered part of the funding offer.

### **STEP 4: Subgrantee Declines or Accepts Funding Award and Conditions**

Upon receipt of the grant award letter, the subgrantee should:

- Review award agreement package;
- Review the *Historic Preservation Fund Grants Manual*, including all Appendices and Exhibits;
- Review any project-specific information accompanying the agreement; and
- Review the certifications and assurances that were submitted with the grant application (these forms are listed in Appendix A; additional copies may be obtained from the HPO).

The subgrantee should contact the HPO if they are unable to meet any of the award conditions or disagree with any of the information contained in the award package. Most discrepancies can be rectified quickly and informally; major differences might require additional clearance from the HPO and/or the NPS. **Subgrantees should be aware that all grant conditions are required under District or Federal law or regulation, and cannot be waived.** If the subgrantee still feels unable to meet any of the conditions, they must decline the award offer.

Subgrantees accepting the conditions of the award must acknowledge their ability to meet the requirements by **signing and returning all of the forms included in the award package to the HPO.** Subgrant awards not accepted within the time frame may be withdrawn by the HPO and offered to another applicant.

### **STEP 5: Subgrantee has "Start-Up" Discussion with HPO Staff**

Shortly after receipt of the subgrantee's acceptance of the award, the HPO arranges a Start-up Meeting/Discussion with the subgrantee, the HPO Staff, and any other necessary parties. The meeting provides an opportunity for the subgrantee to ask questions about the project or award conditions and for the HPO to ensure that all subgrant conditions can be met. By the end of the meeting, both the subgrantee and the HPO should have a clear understanding of what is expected of all parties.

## **STEP 6: Beginning Work**

The subgrantee and their project volunteers and/or contractors may begin work on the project following the Start-up Meeting/Discussion and **after the subgrant is signed by all parties.**

### **Subgrantee's Staff Begins Work**

Different regulations apply to each project participant. In each case, however, it is imperative that the work be necessary and useful to the project, that it is done by someone with the requisite knowledge, training, and skills, and that the effort put forth be properly documented.

The person designated as the subgrantee **Project Coordinator** is responsible for the day-to-day administration of the subgrant project. This person must be conscientious, reliable, and accessible during business hours as they will be the HPO's primary point of contact for the project. The Project Coordinator is responsible for keeping the project on schedule, and preparing and submitting quarterly progress reports, bidding documents, contracts, and reimbursement requests.

Depending on the nature of the project, the subgrantee may have among its existing staff members, a person with the necessary skills, education, and experience to complete the technical aspects of the project. The subgrantee may appoint that individual as the **Principal Investigator**, and charge him or her with the responsibility of completing the subgrant project. Additional staff members may be assigned to assist in the work, but it is the Principal Investigator who has the ultimate responsibility of guaranteeing the quality of the final product. If the subgrantee organization does not have someone within its membership who is qualified to act as Principal Investigator, they must procure the services of a person qualified to act in this capacity. For example, a development project requires that the Principal Investigator be either a qualified general contractor or a licensed architect so that they can communicate effectively with contractors working on the grant project and review the quality of their work. The Principal Investigator protects the interests of the subgrantee organization by ensuring the quality of the contractual services being provided. For more information about the requirements for Principal Investigators, **see Appendix K: Federal Requirements for Principal Investigators.**

All efforts towards completion of the subgrant project by members of the subgrantee organization's staff must be documented on approved time sheets and supported by copies of payroll checks, unless other arrangements have been made with the HPO. **See Appendix D: Preparing Reimbursement Requests, and Exhibit 7: Time Work Record.**

### **Subgrantee's Volunteers Begin Work**

District and Federal regulations allow volunteer workers to donate their time to the project. Such work, if included in the approved project budget and properly executed and documented, can be used as part (up to 50%) of the local matching share required to leverage the Federal grant funds. The efforts of volunteers must be valued at the current minimum wage, unless the person is volunteering a service on a professional basis. The latter donation is referred to as "professional in-kind service." For example, an architect who donates his or her time to complete plans and specifications for a rehabilitation project is providing a professional in-kind service. Although free to the subgrantee organization, professional in-kind services are worth the value of those same services if procured on the open market. However, if the same architect provides labor outside of their professional field, such as scraping paint off of a windowsill, then the donated labor is valued at minimum wage. Subgrantees using volunteer workers must still meet the requirement for a qualified Principal Investigator who will guarantee the quality of the final product.

### **Hiring an Outside Contractor**

When work is to be performed by an outside contractor, the subgrantee must be sure to follow proper procedures for procuring professional services and for preparing a contract.

- Because HPF subgrants consist of Federal funds, subgrantees must follow both District and Federal guidelines concerning contractor selection. In general, these guidelines are intended to ensure that all qualified parties are provided an equal opportunity to be hired, and that the contract price agreed to is fair and reasonable for the services being provided. **See Appendix B: Procurement**, for specific information on required procurement practices. Remember that **bidding documents and proposed contracts must be submitted to the HPO for review and written approval prior to their release**. The HPO reserves the right to reduce or cancel subgrant awards to projects where fair procurement standards are violated.

Following written approval of a proposed contract for services, the subgrantee is free to enter into the contract and initiate work. It is the subgrantee's responsibility to ensure that the contract is enforceable, that its terms adequately describe the work to be completed, and that the terms of the contract are met. **See Appendix B: Procurement**.

## **STEP 7: Work Proceeds, Progress Reports & Reimbursement Requests Submitted**

Subgrantees should be able to proceed with work on their projects on an independent basis, using the appropriate District and Federal guidelines referenced in their subgrant award agreement and this manual. However, the HPO Grants Office is available to answer questions, give advice, or assist with the interpretation of Federal and District standards, rules, and regulations. You are encouraged to contact the Grants Office whenever questions arise; it is better for both the HPO and the subgrantee to identify and resolve problems as soon as they arise.

### **Progress Reports**

Project progress reports must be submitted to the HPO quarterly.

If the subgrantee's project is behind schedule at the end of the second quarter, the HPO may require the subgrantee to submit monthly progress reports until the project is complete.

Progress reports are used to gage a subgrantee's performance, and their likelihood of completing the project on-time and successfully. The form supplied (see Exhibit 1: Subgrantee Progress Report) is fairly brief, and should not be difficult to complete assuming that work is progressing adequately and that financial and administrative control is in place. Additional pages may be attached if necessary. Subgrantees who submit late or inadequate reports may be required to submit additional documentation of progress. **See Appendix C: Preparing Progress Reports**.

Subgrantees should carefully monitor their expenses and advise the HPO promptly if it appears that the project will come in either over or under budget. The HPO attempts to resolve such situations annually by reallocating funds from those projects that have grant funds remaining to other projects. It is critical that these situations be addressed at the earliest opportunity. **See Step 8**. Subgrantees who do not inform the HPO that they may not use all of their allotted funds are inadvertently causing financial hardship to subgrantees in need. This situation also puts the District in peril of having to return the excess and unexpended funds to the Federal government. Such situations will count against a subgrantee if they reapply for HPF grant assistance in the future.

### **Reimbursement Requests**

Subgrantees are required to submit financial **requests for reimbursement** on a periodic basis. The subgrantee may submit claims according to the needs of their particular project and financial situation. However, it is generally recommended that claims be submitted at least quarterly. Subgrantees who believe that they have the financial resources to complete the subgrant-funded project and then seek reimbursement at the end are required to submit at least two claims during the life of the project. If remedial work is required by the HPO, payment of the final claim may be delayed for some time. Therefore, it is important for the subgrantee to have sought reimbursement for part of the project costs along the way so as to avoid financial hardship. **See Appendix D: Preparing Reimbursement/Advance Requests**, for instructions on assembling claims. Refer also to the terms of the grant award agreement concerning this issue. The HPO reserves the right to withhold payment if it has legitimate reasons to question the subgrantee's ability to conclude the project successfully. However, in most cases up to **85%** of the total grant funds will be reimbursed upon receipt of properly documented claims and adequate Progress Reports. **See**

Appendix D for information on preparing reimbursement request forms. The remaining **15%** of subgrant funds will be paid out after final inspection and approval of the project by the HPO; **see** Step 14.

### **Requests for Advances**

The HPO will allow subgrantees to request up to 20% of their grant funds as an advance to help with start-up costs. Advances must be limited to the minimum amounts needed to carry out the purposes of the approved project and must be expended within 30 days of receiving the advanced funds. **See** Appendix D: for information on requesting advances.

Subgrantees must document expending all of the advanced funds by completing and submitting to the HPO a “Liquidation of Advanced Funds” form 30 days after receiving the advanced funds. No additional subgrant funds will be released to the subgrantee until the paperwork liquidating the advanced funds is received and approved by the HPO.

Any and all monies advanced to the subgrantee must be deposited in a bank with FDIC insurance coverage and the balances exceeding the FDIC coverage must be collaterally secure.

**Note: Subgrantees are required to submit a report on the expenditure of funds as of September 30 as this is the end of the Fiscal Year for the HPO. The report must be submitted by October 10. In addition, all subgrantees are required to file a final claim within 60 days of completion of the project. Failure to submit the final claim within 60 days of the project completion or end date may jeopardize the remaining subgrant funds.**

### **Requesting changes to a Project**

A subgrantee may find that circumstances encountered while working on a project are different from those expected when the project was conceived and planned. The HPO should be notified of any situation that might affect the cost, timeliness, final products or proper completion of a subgrant project. It may be determined that the subgrantee should formally request changes to the project budget, schedule, or scope of work.

Changes to the project budget are considered significant if any single line item in the project’s approved budget is inaccurate by **10% or \$250** (whichever is greater), or when the total project budget appears to be inaccurate by **\$2,000 or more**. Changes are also significant if they involve the introduction of a **new work item** not shown on the approved budget breakdown, or if they involve a request to purchase any single items costing more than **\$300**. A change in the Source of Matching Share is also considered a budget change that requires HPO approval.

**Timeliness** is a factor of grant performance that the HPO and the NPS consider to be of great importance. Among other things, it is an important consideration each year when the District reviews grant/subgrant applications. Those who have a poor track record of meeting deadlines on past projects will be downgraded accordingly during subsequent subgrant application evaluations. However, unforeseen circumstances sometimes affect a subgrantee’s ability to perform in accordance with the original schedule. In such cases, the subgrantee must notify the HPO and request a revised schedule, which may include a new project end date. The HPO will consider revising schedules when the need stems from a situation that could not have been foreseen. Changes, particularly extensions, are more difficult to obtain when the problem seems to stem from a lack of interest or diligence in carrying out the work on the part of the subgrantee.

Changes to the Scope of Work as specified in the award agreement are usually linked directly to changes in the list of final products. The HPO is reluctant to make changes in these areas. When changes cannot be avoided, however, the HPO **must** be contacted for permission to adjust the Scope of Work and revise the list of products to be completed under the grant.

### **NPS Approval of Project Changes**

In some cases, changes to a subgrantee’s budget, schedule, or scope of work can be approved by the HPO alone. In other instances the HPO may need to receive written concurrence from the National Park Service (NPS). If the HPO requested change is approved by the NPS, the HPO will supply to the subgrantee a copy of letter or amendment from the HPO approving of the requested changes. Please note that this can be a lengthy process.



There may be instances in which the changes requested are unwarranted, or are considered not to be in the best interest of the HPO. In such cases, the HPO reserves the right to require adherence to the original agreement, to reduce or cancel the subgrant funding, or to negotiate a compromise acceptable to all parties. When appropriate, however, the changes requested are approved by the HPO in a timely manner.

#### **STEP 8: Midpoint Review with the HPO**

At a point approximately halfway through the grant period, the subgrantee will be contacted by the HPO to schedule a Midpoint Review. Midpoint Reviews may take place at the HPO office or at the project site. In some instances, the Midpoint Review may be conducted over the telephone.

The Midpoint Meeting serves as an opportunity for the subgrantee to request advice on particular aspects of the project, and for the HPO to determine whether or not adequate progress is being made on the project. If any problems are encountered in a subgrant project, they should be discussed at the Midpoint Meeting. This will allow the subgrantee either to gain the HPO's approval of the methods being used to resolve such situations, or to explore other options. In preparation for such a meeting, subgrantees are encouraged to review their project records so that they can give a brief verbal report of all progress. The subgrantee should also review the original award agreement and compare it with the work completed and money spent to date.

In order for the HPO to ensure that the final product will be acceptable, the subgrantee should bring a sample of the work completed to date for review. Such items may include a sample of survey forms, draft reports, maps, photographs, draft National Register nominations, etc.

#### **STEP 9: Work Continues: Progress Reports & Reimbursement Requests Submitted**

After the Midpoint Meeting, the subgrantee continues working on the project, incorporating any requirements or suggestions set forth by the HPO. By this stage, there should be no major changes to the project; if there are, they would be accomplished in the manner described in Step 8. Again, it is important for the subgrantee to submit periodic reimbursement requests in order to leverage the grant funds. Subgrantees should be especially conscious of the amount of time and funding remaining through the final half of the project.

#### **STEP 10: Draft Version of Product Submitted for Comment**

The terms of many subgrant agreements require that drafts of reports or products be submitted to HPO at least sixty (60) days before the expiration date of the award agreement. The HPO must log in all received subgrant-funded products and forward them to the appropriate HPO staff for review.

This requirement allows the HPO staff time to carefully review the draft final project and allows the subgrantee time to make the required corrections and improvements while subgrant funds are still available. The costs of making corrections after the project end date are ineligible for reimbursement and will be borne by the subgrantee. Subgrantees can refer to the award agreement to determine whether this requirement applies to their project. Draft products will be returned to the subgrantee with the HPO's comments within 30 days of submission.

In instances where remedial work is necessary, the HPO will work with the subgrantee to bring the product into compliance with all District and Federal requirements in a timely manner. While the HPO can usually help the subgrantee make the necessary improvements, the subgrantee should note that program regulations prevent the HPO from paying for inadequate or inferior work. Please note that subgrantees who fail to bring a project to completion in compliance with District and Federal guidelines may be required to reimburse the National Park Service all subgrant funds received.

### **STEP 11: Final Version of Product Submitted for Approval**

The final product should be submitted 30 days after receipt of the HPO's comments on the draft, however subgrantees should refer to their award agreement to determine the exact due date. **See Step 14 below.**

### **STEP 12: Final Claim and Financial Report Submitted**

When all subgrant project work has been completed, the subgrantee should prepare and submit a final reimbursement request. This should be accompanied by a brief report comparing the budget estimate shown in the award agreement (or as amended) with the actual outlay in each budget category. The report should also justify variances in each category. **Subgrantees who fail to submit their final claim within 60 days of the project completion or end date may jeopardize receipt of their remaining subgrant funds.**

### **STEP 13: Product Officially Accepted by the HPO and Final Payment Issued**

The product(s) created or work performed/produced using HPF grant funding will be reviewed for professional quality and adherence to District and National Park Service standards. Subgrantees will be notified if the product is acceptable or not. In instances where corrections must be made, the HPO will work with the subgrantee to bring the product into compliance in a timely manner. When all of the work has been completed and accepted, and all of the financial documentation has been submitted, the HPO can pay the 15% retention, or the balance of the subgrant funds. This concludes the subgrant agreement, and the project is considered to be complete.

## GRANT PROJECT CHECKLIST

This checklist is designed to help Project Coordinators keep track of all the necessary steps toward completing an HPF subgrant project. Depending on the precise nature of any given project, additional steps may be required beyond those listed below. Project Coordinators are encouraged to refer back to this list and check the box as each activity is completed.

### Grant Application Writing

Refer to Step 1, Step 2, and Step 3

- Applicant obtains a copy of, and reviews, the subgrant RFP and application
- Applicant attends HPO grant workshop
- Applicant completes grant application

### Grant Acceptance and Project Initiation

Refer to Step 4, Step 5, Step 6, and Appendix A, Appendix J

#### Formal Acceptance of Grant Award

- Subgrantee submits all copies of signed Subgrant Award and any attached forms
- Subgrantee submits completed W-9 Taxpayer Identification form

#### Grant Project Start-up Meeting/Discussion

- Subgrantee reviews *Grants Manual*, and terms of award agreement prior to start-up meeting
- Subgrantee prepares list of questions for the HPO prior to Start-Up Meeting
- Subgrantee attends Start-Up Meeting at HPO or project site

### Procurement

Refer to Step 7, and Appendix B

#### Preparation of Bidding Document / Solicitation of Bids

- Subgrantee prepares draft bidding document with all required information and Federal language
- Subgrantee mails or faxes draft bidding document to HPO for review
- Subgrantee receives input from HPO, makes revisions and corrections as needed
- Subgrantee mails or faxes revised bidding document to HPO for review
- Subgrantee receives approval of bidding document from HPO
- Subgrantee sends approved bidding document to potential contractors

#### (Preparation of Newspaper Advertisements (required only for procurements of \$25,000 or more))

- Subgrantee prepares draft newspaper ad with all required information and Federal language
- Subgrantee mails or faxes draft newspaper advertisement to HPO for review
- Subgrantee receives input from HPO, makes revisions and corrections as needed
- Subgrantee mails or faxes revised newspaper advertisement to HPO for review
- Subgrantee receives approval of newspaper advertisement from HPO
- Subgrantee places advertisement in regional and minority newspapers

#### Preparation of Contract Documents

- Subgrantee prepares draft contract document with all required information and Federal language
- Subgrantee mails or faxes draft contract document to HPO for review
- Subgrantee receives input from HPO, makes revisions and corrections as needed
- Subgrantee mails or faxes revised contract document to HPO for review
- Subgrantee receives approval of contract document from HPO
- Subgrantee signs contract document and sends it to contractor for signature

- Subgrantee mails photocopy of signed contract document to HPO  
**(If necessary)**
- Subgrantee repeats all steps above for second bidding opportunity
- Subgrantee repeats all steps above for third bidding opportunity

**Progress Reporting (based on a 1 year project)**

Refer to Step 8, Step 9, Step 10, Step 11, Appendix C, Appendix I, and Exhibit 1

- Subgrantee submits progress report for the first quarter of the project
- Subgrantee submits progress report for the second quarter of the project
- Subgrantee provides detailed progress information to HPO staff during midpoint meeting
- Subgrantee submits progress report for the third quarter of the project
- Subgrantee submits progress report for the fourth quarter of the project

**If necessary**

- Subgrantee notifies HPO of any problems affecting the project budget, schedule, or scope of work
- Subgrantee submits written request for amendment to project budget, timetable, or scope of work
- Subgrantee receives approval of request for amendment to project budget, timetable, or scope of work

**Reimbursement/Advance Requests**

Refer to Step 8, Step 10, Appendix D, Appendix E, Appendix F, Exhibit 2, Exhibit 3, and Exhibit 4

- Subgrantee organizes invoices and documentation, submits first reimbursement/advance request
- Subgrantee organizes invoices and documentation, submits liquidation form if advance was requested
- Subgrantee organizes invoices and documentation, submits second reimbursement request
- Subgrantee organizes invoices and documentation, submits third reimbursement request

**Press Releases (When Appropriate)**

Refer to Appendix G and Appendix H

- Subgrantee prepares draft of press release including required Federal acknowledgment
- Subgrantee mails or faxes press release to HPO for review
- Subgrantee receives input from HPO, makes revisions and corrections as needed
- Subgrantee mails or faxes revised press release to HPO for review
- Subgrantee receives approval of press release from HPO
- Subgrantee sends press release to local media

**Completion and Close-out of Grant Project**

Refer to Step 10, Step 11, Step 12, Step 13, Appendix H, and Appendix I

**For “Architectural & Historical” and “Archaeological” projects:**

- Subgrantee submits draft of any final products to HPO for review 60 days before the project expiration date
- Subgrantee receives input from HPO, makes revisions and corrections as needed
- Subgrantee submits revised/finalized products to HPO for approval by project end date
- Subgrantee receives written notification of approval and acceptance of final subgrant product
- Subgrantee submits final reimbursement request within 60 days of project completion or end date  
(whichever comes first)

## **PART II: REQUIREMENTS FOR ALL SUBGRANTS/CONTRACTS**

The following requirements apply to **all** projects receiving Historic Preservation Fund grant assistance.

- The project will be administered in accordance with the conditions, certifications, and requirements listed in **Appendix A: Conditions and Certifications**.
- The project will be conducted in accordance with the appropriate program-area requirements listed in **Part III: Grant/Subgrant Requirements By Program Area**.
- Subgrantees will abide by the fiscal requirements listed in **Appendix F: Fiscal Requirements** and the circulars issued by the Office of Management and Budget (OMB).
- Subgrantees will abide by the requirements for procurement, the reimbursement process, and allowable costs as listed in **Appendix B: Procurement, Appendix D: Preparing Reimbursement/Advance Requests, and Appendix E: Allowable and Unallowable Costs**.
- Press releases will be issued in accordance with **Appendix G: Press Releases, and Appendix H: Acknowledgment of District and Federal Assistance**.

In addition, each project will be governed by all of the following conditions:

### **Civil Rights**

All subgrant projects must be administered and conducted in conformance with the **Civil Rights Act of 1964**, and **Section 504 of the Rehabilitation Act of 1973**. **Title VI of the Civil Rights Act of 1964** states that no person will, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. As amended, Section 504 also prohibits discrimination against the disabled.

### **Conflict of Interest Involving Federal Employees**

The subgrant recipient will not use any Historic Preservation Fund monies or funds from other sources, (applied as a matching share) to pay a fee to, or to pay the travel expenses of, current employees of the Federal government for consultant services, lectures, attendance at program functions (including HABS/HAER participation), or any other activity in connection with a grant or any subagreement awarded under the HPF grant. Subgrant recipients are to consult with the HPO when the potential for such a conflict arises. This prohibition is in accordance with **18 USC 209** that stipulates that Federal employees whose employment has not terminated will not receive supplemental compensation for their services in their capacity as Federal government employees.

### **Conflict of Interest Involving District Employees**

No member, officer, or employee of the D.C. Historic Preservation Office or the D.C. Historic Preservation Review Board, will have any interest in any HPF grant/subgrant agreement or the proceeds thereof, except that such persons may provide technical, consultative, or oversight assistance in a voluntary capacity (i.e., unpaid, and the time not charged to the required matching share for the Historic Preservation Fund grant). A waiver may be requested if it is determined that such an exception will serve to further the purposes of a subgrantee's overall program.

### **Contingency Funds**

No subgrant funds may be set-aside for contingency purposes on development projects. Subgrant funds may be paid out only toward the actual costs incurred under the line items specified in the approved project budget. The HPO will make every effort to help subgrant recipients structure their project, scope of work, bid documents, etc., so as to minimize costs and reduce the possibility of being overcharged by contractors. In this way the project will be able to stay as close as possible to the original budget. These practices should help to minimize unforeseen costs, and therefore cancel the need for contingency funds. If unforeseen costs arise that push the project over budget, the HPO will make every effort to reallocate additional funds to this project, if such funds are available at the end of the HPF grant cycle. However, it is the subgrant recipient's responsibility to bear all costs over and above the project budget. Therefore, it is in the best interest of both the subgrantee and the HPO to work to keep costs as low as possible, to investigate potential problems that could affect the overall project budget, to work to mitigate these problems, and to schedule work items or modify the scope of work to accommodate such situations.

### **Contingent Fees**

No person, agency, or other organization may be employed or retained to solicit or secure a subgrant or contract upon agreement or understanding for a commission, percentage, brokerage, or contingent fee. For breach or violation of this prohibition, the District will have the right to annul the agreement without liability or, at its discretion, to deduct from the subgrant or otherwise recover the full amount of such commission, percentage, brokerage, or contingent fee, or to seek such other remedies as may be legally available.

### **Convict Labor**

In accordance with **Executive Order 11755**, no person undergoing a sentence of imprisonment at hard labor will be employed on any HPF grant-assisted project. (Labor performed by District prisoners who are on work-release, parole, or probation does not fall under this prohibition.)

### **Disclosure of Information**

HPF subgrant recipients should be aware that information provided to the District in the course of the subgrant (including financial documentation) is considered to be public record and subject to disclosure under the **Freedom of Information Act, 5 USC 552** (unless the subgrant recipient is determined to be exempt and information is not to be disclosed under those statutes or **Section 301 of the National Historic Preservation Act**). In addition, the District and the National Park Service have the right, unless otherwise specified in the award agreement, to use and disclose program and project data. However, there may be some information that a subgrant recipient may wish to remain confidential. Such items must be clearly and prominently identified to the District at the time the information is within the limits imposed by District and Federal regulations on public disclosure. Note that the District retains the right not to reveal the exact location of historic, architectural, or archaeological sites identified as a result of a subgrant assisted project if the District feels that this is necessary for the protection of such sites.

### **Discrimination in Employment Prohibited**

In all hiring or employment made possible by or resulting from subgrant awards, each employer:

- Will not discriminate against any employees or applicants for employment because of race, color, religion, sex, age, or national origin; and
- Will take affirmative action to ensure that applicants are employed, and that employees are treated without regard to their race, color, religion, sex, age, or national origin during their employment.

This requirement applies to, but is not limited to, the following:

- Employment promotion, demotion, or transfer;
- Recruitment;
- Layoff or termination;
- Rates of pay or other forms of compensation; and
- Selection for training, including apprenticeship.

The subgrant recipient will comply with all applicable statutes and Executive Orders on equal employment opportunity. Subgrant awards will be governed by the provisions of all such statutes and Executive Orders, including (but not limited to) enforcement provisions as implemented by Department of the Interior policies, published in **43 CFR 17**.

### **Dual Compensation**

If a subgrant recipient's staff member or consultant is involved simultaneously in two or more projects supported by any Federal funds, and compensation on either project is based upon a percentage of time spent, the total compensation from any Federal funds during this period of dual involvement is limited to an amount not to exceed 100% of that person's time.

### **Examination of Records**

The Government of the District of Columbia, the U.S. Department of the Interior, the Comptroller General of the United States, and/or any of their authorized representatives will have the right of access to any books, documents, papers, or other records of the subgrant recipient which are pertinent to the subgrant in order to make audit, examination, excerpts, and transcripts. **See Appendix F: Fiscal Requirements.**

### **Hiring Practices**

All persons engaged to work on a HPF grant assisted project, either as regular paid staff members of the grant/subgrant recipient or as consultants hired on a contractual basis, must be selected in accordance with **appropriate competitive and nondiscriminatory procurement standards**. See Appendix B: Procurement.

### **Nondiscrimination on the Basis of Disability**

**Section 504** of the **Rehabilitation Act of 1973 (Public Law 93-112, as amended, 29 USC 794 et seq.)** requires that no qualified disabled individual be solely, by reason of disability, excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving Federal assistance. Grant/subgrant recipients must operate their program so that the program, when viewed in its entirety, is readily accessible to and usable by qualified disabled persons. In addition, no qualified disabled person will, on the basis of disability, be subjected to discrimination in employment under the grant program.

### **OMB Circulars**

Compliance with Office of Management and Budget Circulars is required. Copies of specific circulars can be obtained from EOP Publication Services, Office of Management and Budget, 725 17th Street NW, Room 2200, Washington, D.C. 20503 (202-395-7332) and can be found on the OMB website ([www.omb.gov](http://www.omb.gov)).

### **Political Activities**

The subgrant recipient must administer their project in a manner consistent with the provision of **18 USC 1913**; costs associated with activities to influence legislation pending before Congress or the Council of the District of Columbia, commonly referred to as “lobbying,” are unallowable as charges to the subgrant, either on a direct or indirect cost basis. In addition, no expenditure of subgrant funds may be made for the use of equipment or premises for political purposes, sponsoring or conducting a candidate’s meeting(s), engaging in voter registration or voter transportation activities, or other partisan political activities.

### **Publications**

Publications and other public dissemination of information made possible by subgrant assistance must acknowledge support from the National Park Service, U.S. Department of the Interior, and the District of Columbia Historic Preservation Office by use of the statements listed in Appendix H: Acknowledgment of District and Federal Assistance.

### **Reports, Records, and Inspections**

The subgrant recipient will submit financial, progress, and other reports as required by the District. Subgrant recipients and their contractors will permit on-site inspections by District representatives, and will effectively require employees to furnish such information as (in the judgment of the District) may be relevant to a question of compliance with subgrant conditions.

### **Safety Precautions**

The District assumes no responsibility with respect to accidents, illnesses, or claims arising out of any work performed under a HPF grant-supported project. The subgrant recipient is expected to take necessary steps to insure itself and its personnel and to comply with the applicable local, District, or Federal safety standards, including those issued pursuant to the **National Occupational Safety and Health Act of 1970**.

### **Scope of Work**

Subgrant recipients will complete the project according to the proposed Scope of Work spelled out in the award agreement. A request for a change can be made, but the change will not be enacted unless a scope of work amendment is formally requested by the subgrantee and subsequently approved in writing by the HPO.

### **Special Conditions**

The terms of the subgrant award may include standard and/or special provisions that are considered necessary to obtain the objectives of the project, facilitate post award administration of the subgrant, conserve subgrant funds, or otherwise protect the interests of the District and/or Federal government. Any such conditions will be found in the award agreement package. Failure to comply with any such conditions may cause disallowance of certain costs.

**Timeliness of Project Work**

The subgrant recipient must commence work on the project within a reasonable amount of time after the subgrant is awarded. **Note that adequate progress towards the procurement of goods and services must be demonstrated during the first quarter of the project. Failure to show demonstrable progress on project procurement during this time may result in cancellation of the subgrant,** with the project funds being transferred to another proposal. Even if a proposed project is not set to begin during the first quarter of the program cycle, subgrantees are still responsible for making progress on securing goods and services for the project. Costs incurred beyond the end date of the project will not be reimbursed without prior written permission from the HPO.



## **PART III: GRANT/SUBGRANT REQUIREMENTS BY PROGRAM AREA**

### **Architectural & Historical Survey Projects Must:**

- Be conducted in accordance with the *Secretary of the Interior's Standards and Guidelines for Planning, Identification, Evaluation and Registration*. Copies of the *Standards* can be found on the National Park Services, Cultural Resources Division's website at <http://www.cr.nps.gov/linklaws.htm>;
- Meet all applicable requirements of this *Grants Manual*;
- Meet any additional requirements listed in the award agreement

While only one set of survey forms is normally completed and submitted to the HPO, subgrantees may wish to prepare a second set for retention by a local organization or governmental agency. The HPO encourages this, and would consider the costs associated with the production of a second set as an allowable subgrant expense (with prior written approval).

### **Archaeological Investigation Projects Must:**

- Be conducted in accordance with the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation*. Copies of the *Standards* can be found on the National Park Services, Cultural Resources Division's website at <http://www.cr.nps.gov/linklaws.htm>;
- Be conducted in accordance with the *Guidelines for Archaeological Investigations in the District of Columbia*. Copies of the *Guidelines* can be obtained by contacting the D.C. Historic Preservation Office at 202-442-8800;
- Include any changes or revisions as required by the HPO Archaeological Staff following their review of the project;
- Meet all applicable requirements of this *Grants Manual*; and
- Meet any additional requirements listed in the award agreement.

### **National Register Projects Must;**

Meet any additional requirements listed in the grant agreement.

- Be conducted in accordance with the *Secretary of the Interior's Standards and Guidelines for Planning, Identification, Evaluation, and Registration*. Copies of the *Standards* can be found on the National Park Services, Cultural Resources Division's website at <http://www.cr.nps.gov/linklaws.htm>;
- Be conducted in accordance with *National Register Bulletin 16A, How to Complete the National Register Registration Form*, and *Bulletin 16B, How to Complete the National Register Multiple Property Documentation Form* issued by the National Park Service explaining the National Register process and requirements. Copies of these *Bulletins* can be found on the National Register of Historic Places website at <http://www.cr.nps.gov/nr/publications/bulletins.htm>;
- Be conducted in accordance with the instructions contained in the D.C. HPO National Register Application;
- Include, as part of the final product, two sets of recent black and white photographs meeting National Register Standards, and measuring at least 5" X 7";
- Meet all applicable requirements of this *Grants Manual*; and
- Meet any additional requirements in the award agreement.

### **Historic Preservation Planning Projects Must:**

- Be conducted in accordance with the *Secretary of the Interior's Standards and Guidelines for Historic Preservation Planning*. Copies of the *Standards* can be found on the National Park Services, Cultural Resources Division's website at <http://www.cr.nps.gov/linklaws.htm>;
- Be conducted in accordance with the *District of Columbia Historic Preservation Plan 2008-2012*. Copies of the *Plan* can be obtained by contacting the Historic Preservation Office at 202-442-8800;
- Be conducted in accordance with previous District-sponsored historic contexts;
- Meet all applicable requirements of this *Grants Manual*; and
- Meet any additional requirements listed in the award agreement.

**Publication Projects Must:**

- Relate information that is consistent with the appropriate *Secretary of the Interior's Standards and Guidelines*;
- Be in a format consistent with other HPO publications;
- Be reviewed for content and approved by the HPO prior to publication;
- Acknowledge District and Federal involvement, and include nondiscrimination statements, in wording approved by the HPO. **See** Appendix H: Acknowledgment of District and Federal Assistance;
- Provide for the free distribution of all copies printed with Federal grant money and matching funds, unless previous arrangements have been made with the HPO;
- Provide for the distribution of some number of publications to the HPO at no charge (the precise quantity will be set forth in the grant agreement);
- Meet all applicable requirements of this *Grants Manual*; and
- Meet any additional requirements listed in the award agreement.

## **Appendix A: Conditions and Certifications**

The following Federal conditions and certifications were included in the HPO grant application packet and are considered to be applicable to all grant/sub projects:

- Certification of Matching Share;
- Certification Regarding Debarment, Suspension, Ineligibility, and Voluntary Exclusion; and
- Assurance of Compliance, Title VI, Civil Rights act of 1964.

Subgrantees who did not retain copies of the signed originals of these documents or who have misplaced their copies of these forms may contact the HPO for copies.

Other items that require the signature of an authorized agent of the subgrantee organization, and that must be submitted to the HPO before the subgrant project may begin include:

- Construction Assurances or Nonconstruction Assurances, depending on the type of project;
- Award agreement;
- W-9 Taxpayer Identification Form (if not already on file with the District); and

Other project-specific conditions included with the subgrant agreement may not be listed above; subgrantees should review their agreement for information on any other conditions or project-specific requirements.

## Appendix B: Procurement

When Historic Preservation Fund grants/subgrants (public monies) are used to procure supplies, equipment, or personal services, the purchases must be made in compliance with District and Federal standards that govern this program. These standards vary in accordance with the size and nature of the purchase.

### Supplies

Single tangible items costing **less than \$5,000** and purchased solely for subgrant purposes are considered to be supplies. Subgrantees who are universities or local governments usually have in place an adequate system by which these purchases are made. All subgrantees are expected to exercise reasonable care to ensure that such purchases are made at or below fair market value.

The HPO will ordinarily not question purchases over **\$300**, as long as the items bought are necessary and useful to the completion of the project, and the costs paid are properly documented and appear reasonable. However, the subgrantee will be asked to justify purchases over \$300 or that do not meet these standards.

### Equipment

Single tangible items costing **more than \$5,000** are considered to be equipment and may be purchased only with prior written permission from the HPO. If such permission is given, the HPO will provide further instruction (on a case-by-case basis) regarding procurement requirements. At a minimum, these will include the gathering of **three or more price quotations from qualified vendors**. **Note** that the HPO and the National Park Service are reluctant to allow HPF grant funds to be used for equipment purchases.

### Personal or Contractual Services

Subgrantees often must hire additional staff or contract with consultants and/or contractors to complete subgrant projects. In either case, an open selection process must be used to ensure that qualified workers are engaged at a reasonable price. Workers engaged by the subgrantee on an hourly, salaried, or volunteer basis are considered to be the subgrantee's employees. New employees hired to work on the subgrant project must be selected from a pool of qualified applicants located after advertising in local papers or otherwise making the position known to potential candidates. All of the subgrantee's hiring practices must be conducted in accordance with District and Federal regulations prohibiting discrimination on the basis of age, sex, race, color, or disability. In many cases, a subgrantee finds it advisable to engage a professional or consultant to serve as the principal investigator on the project or to provide some other specialized service. These professionals and consultants are hired on a contractual basis, usually agreeing to provide a certain product or service for a fixed price. These contractors are not considered to be employees of the subgrantee organization.

Procurement transactions must be conducted in a manner that provides maximum **open and free competition**. Procurement procedures must not restrict or eliminate competition. Examples of restriction of competition include but are not limited to: placing unreasonable requirements on firms in order for them to qualify to do business, noncompetitive practices between firms, organizational conflicts of interest, and unnecessary experience and bonding requirements. **When Historic Preservation Fund subgrants are used to procure supplies, equipment, or personal or contractual services, competitive sealed bids must be publicly solicited through direct invitation to bid and/or through formal advertising.** A fixed-fee price contract (lump-sum or unit price) will be awarded to the bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is lowest in price and is most advantageous to the subgrantee, considering the price, discounts, transportation costs, taxes, and the contractor's ability to fulfill the contract. Note that there may be instances where a contractor is not the lowest bidder, but can guarantee higher quality work for a reasonable price. When such situations can be documented and justified, it often makes sense to hire this bidder instead of the lowest bidder. For example, a roofing contractor that deals primarily with slate roofs would be preferable to a lower bidding contractor with little or no experience working with slate roofs, assuming that the difference in cost between the two bids is reasonable.

### **District Local, Small, Disadvantaged Business Enterprises (LSDBEs)**

The District's Local, Small, Disadvantaged Business Enterprise (LSDBE) Certification Program is designed to build the capacity of local, small, and disadvantaged businesses and to stimulate economic development in the District of Columbia. Subgrantees, like the District, must give preference to registered LSDBE business when purchasing items or services. A complete, searchable list of LSDBE businesses can be found on the Office of Local Business Development's website at <http://olbd.dc.gov>.

### **Preparing the Bid Documents**

The subgrantee must have written selection procedures in place for procurement transactions to be approved. Bids must be solicited from an adequate number of known consultants, suppliers, or contractors for a minimum period of **fourteen (14) calendar days or ten (10) working days**.

The bid documents (and subsequently the contract documents) must include the six following parts:

- 1. A clear and accurate description of the technical requirements for the material, product, or service to be procured, and a clear definition or description of the work items or services being sought.** Such description will not, in competitive procurement, contain features that unduly restrict competition. The description may include a statement of the qualitative nature of the material, product, or service to be procured, and will set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. (For example, the work must meet *Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties*.) Included in this section should be references to any **specifications and pertinent attachments** (such as Preservation Briefs, Tech Notes, or samples of similar products).
- 2. A list of all requirements** which bidders must fulfill and all other factors to be used in evaluating bids or proposals, such as prior experience working with slate roofing, previous experience in completing National Register nominations, etc.
- 3. A payment schedule** for the reimbursement of contracted work. The HPO will withhold 15% of the total subgrant amount until the HPO staff has reviewed the completed project and found it to be in compliance with the applicable *Secretary of the Interior's Standards and Guidelines* and all other District and Federal requirements. As a precautionary measure, subgrantees are urged to adopt a similar measure (15% contract retention until work is approved by the HPO) to help guarantee that contract work will be completed successfully, in a timely manner, and in compliance with all of the project requirements.
- 4. A deadline for the submission of bids**, and a place and time for the opening and reading of all bids received.
- 5. A deadline for the completion of work** on the project.
- 6. A termination for breach of contract clause**, that explains the manner by which the subgrantee may enact it, and the administrative, contractual, or legal remedies available to the subgrantee. Such language must describe the conditions under which the contract may be terminated for default, as well as conditions where the contract may be terminated because of circumstances beyond the control of the contractor. The following wording is only a sample of such a clause, and this wording may not be appropriate for all projects. Subgrantees are encouraged to modify the following language as they see fit for their particular project, or to seek legal advice for appropriate wording.

### **Termination For Breach of Contract**

If the contractor fails to perform the work in an acceptable manner, the owner may give notice in writing to the contractor and his surety of such failure or refusal, specifying the same and directing what action shall be taken. Any one of the following will be considered sufficient justification for such notice:

1. Failure to begin the work under the contract within the time specified.
2. Failure to perform the work with sufficient supervision, workmen, staffing, equipment, and materials to insure the prompt completion of said work.
3. Unsuitable and/or unsatisfactory performance of the work.

4. Neglecting to or refusing to remove/replace defective materials and workmanship, or failure to perform anew such work as may have been rejected by the owner.
5. Discontinuing the prosecution of the work or any part of it.
6. Inability to finance the work adequately.
7. If, for any other reason, the contractor fails to carry on the work in an acceptable manner.

If the contractor, or his surety, within a period of ten (10) days after such notice does not proceed in compliance therewith, then the owner shall have full power and authority, without violating the contract, to take the prosecution of the work out of the hands of said contractor, to appropriate or use any and all materials and equipment on the grounds as may be suitable and acceptable, and may, at his option, turn the work over to the surety, or enter into an agreement with another contractor for the completion of the contract according to the terms and provisions thereof, or he may use such other methods as, in his opinion, shall be required for the completion of said contract in an acceptable manner. All costs of completing the work under the contract shall be deducted from any monies due or which may become due of said contractor. In case the expense so incurred by the owner may be less than the sum which would have been payable under the contract if it had been completed by said contractor, then said contractor shall be entitled to receive the difference, but in case such expense shall exceed the sum which would have been payable under the contract, then the contractor and his surety shall be liable and shall pay to the owner the amount of said excess. By taking over the prosecution of the work, the owner does not forfeit the right to recover damages from the contractor or his surety for his failure to complete the work within the time specified.

**7. In addition, the bid documents (and subsequently the contract documents) must include the following language verbatim:**

- This project is funded in part by a grant from the U.S. Department of the Interior, National Park Service's Historic Preservation Fund Program, and is being administered by the District of Columbia Historic Preservation Office. Compliance with all applicable Federal, District, and local laws, rules, and regulations is required.
- The *Secretary of the Interior's Standards and Guidelines* are made part hereof by reference and must be complied with in this project.
- The D.C. Historic Preservation Office, the U.S. Department of the Interior, the Comptroller General of the United States, or any of their duly authorized representatives, will have access to any books, documents, papers, and records of the contractor that are directly pertinent to that specific contract, for the purpose of making audit, examination, excerpts, and transcription. Such records must be maintained for three (3) years after closeout of the contract.
- No part of the money appropriated by any enactment of Congress will, in the absence of express authorization by the Congress, be used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a Member of the U.S. Congress, to favor or oppose, by vote or otherwise, any legislation or appropriation by Congress, whether before or after the introduction of any bill or resolution proposing such legislation or appropriation; but this will not prevent officers or employees of the United States or its Departments or Agencies or employees of the District from communicating to Members of Congress at the request of any Member, or to Congress through the proper official channels, requests for legislation or appropriations which they deem necessary for the efficient conduct of the public business.
- The project must be carried out in compliance with the Copeland Anti-Kickback Act (18 USC 874) as supplemented in Department of Labor regulations. This act provides that each contractor will be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation of which he or she is otherwise entitled.

- The project must be carried out in compliance with Executive Order 11246, entitled “Equal Employment Opportunity,” as amended by Executive Order 11375, and as supplemented in Department of Labor Regulations (41 CFR 60).

#### **Procurement of Less Than \$10,000**

Any procurement of goods and/or service that is less than \$10,000 may be sole-sourced upon written approval of the HPO. Obtaining at least three bids by mail is recommended and expected by the HPO unless otherwise approved.

#### **Procurements of Less Than \$25,000**

Any procurement of goods and/or services that is expected to be less than \$25,000 may be handled by direct invitation to a minimum number of qualified bidders. After approval of the bidding documents by the HPO, the invitation to bid must be mailed to a minimum of five (5) qualified bidders. Invitations to bid should be sent by certified mail with a return receipt card. This return receipt will provide the proof that the invitation to bid was mailed in the event that the invited contractor does not respond. In order to satisfy District and Federal fair procurement standards, it is important to be able to document that an acceptable minimum number of qualified bidders (including LSDBE businesses) was included in the bidding opportunity. If fewer than five (5) bidders respond, fair procurement standards are satisfied so long as the subgrantee can prove that it made a good faith effort to secure at least five (5) bids. Therefore, it is imperative to maintain documentation of the bid mailing by return receipt cards.

If the subgrantee anticipates that a procurement of goods and/or services will be close to \$25,000, it is usually best to formally advertise the bidding opportunity in the newspaper (as explained below) and also send direct invitations to bid. If all responses to direct invitations yield bids in excess of \$25,000, the bidding is void and must be rebid via formal advertisements in newspapers.

#### **Procurements of \$25,000 or More**

Any procurement of goods and/or services that is expected to equal or exceed \$25,000, or is expected to be over \$25,000, must be formally advertised in a major newspaper that covers the area affected by the project, as well as in a minority newspaper serving the same area. The ads must be placed **at least two weeks prior to the bid date**, and should run at least one time per week for two consecutive weeks. The advertisement **must** state that the project is funded in part by a grant from the U.S. Department of the Interior, National Park Service’s Historic Preservation Fund Program, administered by the District of Columbia, Historic Preservation Office, and that compliance with all applicable Federal, District, and local laws, rules, and regulations is required. Minimum documentation of formal advertising for audit purposes consists of a copy of the actual advertisement run in the appropriate newspapers with a copy of the invoice showing the dates that the advertisements were published. Note that the costs of newspaper advertisement are reimbursable under the subgrant, although these costs may not have been written into the original project budget.

Although newspaper advertisement is required for procurements over \$25,000, subgrantees are strongly encouraged also to send out direct invitations to bid. This will help to ensure that the bidding opportunity is brought to the attention of qualified local contractors who might not learn of the project through the newspaper advertisement. There is no minimum number of contractors that must be invited in this instance.

In an effort to keep newspaper advertising costs to a minimum, while still including all of the required Federal language, the bid advertisement prepared for newspapers may use the abbreviated language below. Newspaper advertisements may also contain an abbreviated termination for breach of contract clause. **Note, however, that all direct invitations to bid must use the full-length version of these statements given above.**

- This project is funded in part by a grant from the U.S. Department of the Interior, National Park Service’s Historic Preservation Fund Program, as administered by the District of Columbia, Historic Preservation Office. Compliance with all applicable Federal, District, and local laws, rules, and regulations is required.
- The *Secretary of the Interior’s Standards and Guidelines* are made part hereof by reference and must be complied with in this project.

- The District of Columbia, Historic Preservation Office or a representative thereof, the U.S. Department of the Interior, and the Comptroller General of the United States will have access to any books, documents, papers, and records related to the grant project for a period of three (3) years.
- In accordance with the Hatch Act, no part of the Federal grant funds may be used for lobbying purposes, or to influence Federal legislation or lawmakers in any way.
- The project must be carried out in compliance with the Copeland Anti-Kickback Act (18 USC 874) as supplemented in Department of Labor regulations.
- The project must be carried out in compliance with Executive Order 11246, entitled “Equal Employment Opportunity,” as amended by Executive Order 11375, and as supplemented in Department of Labor Regulations.
- The project must be carried out in compliance with mandatory standards and policies relating to energy efficiency contained in the District energy conservation plan issued in compliance with the Energy Policy and Conservation Act.
- All contractors must take the necessary steps to insure themselves and their personnel, and to comply with the applicable safety standards and the National Occupational Safety and Health Act of 1970.
- The project must be carried out in compliance with Section 401 of the Lead-Based Paint Poisoning Prevention Act which prohibits the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance. (This item may not apply to all development projects and may be omitted if not applicable.)
- Minimum standards for facilities to be used by the disabled are to be included in the project specifications to the maximum extent possible for any historic preservation construction grant as required by the Architectural Barriers Act of 1968. (This item may not apply to all development projects and may be omitted if not applicable.)



### **Preparing the Contract Document**

Once the invitation to bid has been sent out, it is a good idea to begin preparing the contract document. This will help to save time later when the HPO has approved of the subgrantee's request to hire a contractor. **The contract MUST contain all of the same project requirements and required District and Federal language as did the invitation to bid, as well as the deadline for the completion of work, the termination for breach of contract clause, and the payment schedule.** Once the bidding document has been approved, the subgrantee may simply revise it to create a contract document. The subgrantee will need to insert the subgrantee organization's name and the contractor's name, the fee to be paid for the goods and/or services to be provided, and lines for signatures. The HPO will need to review and approve of the contract document before it is released for signature.

### **Awarding the Contract**

**A contract for any aspect of project work cannot be entered into without the prior written approval of the HPO.** It is not always necessary to award the contract to the lowest bidder. There may be instances where a contractor is not the lowest bidder, but can guarantee higher quality work for a reasonable price. When such situations can be documented and justified, it often makes sense to hire this bidder instead of the lowest bidder.

If unusual circumstances arise surrounding the awarding of contracts, the HPO should be consulted. Examples of unusual circumstances are failure to receive a sufficient number of bids, great disparity in bid quotations, or intent to award a contract to someone other than the lowest bidder. The subgrantee must maintain records sufficient to detail the significant history of a procurement. These records will include, but are not necessarily limited to, information pertinent to the following: rationale for the method of procurement, selection of contract type, all bids received, contractor selection or rejection notices, and the basis for the cost or price of the goods and/or services to be provided.

Once the subgrantee has selected a contractor, written approval of this selection must be obtained from the HPO before a contract for services is signed. The subgrantee should send the HPO a formal "**request to hire**" letter that includes all of the following parts:

- ✓ A brief history of the procurement process: which contractors received direct invitations to bid (documented by certified mail receipts), and which newspapers ran advertisements of the bidding opportunity (documented by photocopies of the advertisements and invoices from the newspapers if available);
- ✓ A list of all bidders with their bid price (documented by a photocopied page from each bid showing the bidder's name and price -- note that a photocopy of each bid in its entirety may not be required if the bids are extremely lengthy);
- ✓ An explanation of bidding irregularities, if any;
- ✓ A justification for hiring someone other than the low bidder, if applicable;
- ✓ A statement formally requesting to hire one specific contractor for the fixed-fee amount quoted.

Contract awards will be made only to responsible contractors that possess the potential ability to perform successfully under the terms and conditions of proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of acceptable past performance, and financial and technical resources available. Contract awards will not be made to a contractor or professional who has developed or drafted, on behalf of the subgrantee, bid specifications, project requirements, statement of work, invitation for bids, and/or request for proposals for a particular procurement as any of these situations would constitute a conflict of interest.

### **Procurement Process Overview**

The following requirements apply to **all** grants/subgrants:

- The subgrantee must seek qualified bidders through an **open selection** process which includes at a minimum:
  - a. Preparation of a **bid proposal** specific enough to allow a vendor to prepare an appropriate bid. The proposal must include information on the work to be done, standards and regulations to be observed, deadlines to be met, and the involvement of Federal grant funds.
  - b. Submission of all bid documents and contracts to the HPO for approval. **Note** that bid documents and contracts may not be distributed without the written approval.

- c. Advertising the opportunity through direct invitation to bidders and/or by formal advertisements placed in local and statewide newspapers (newspaper advertisements are required only for procurements of \$25,000 or more). The bid period must span a minimum of fourteen (14) days.
- The subgrantee must provide evidence that:
  - a. The fee for services rendered is appropriate considering the qualifications of the consultant, his or her normal charges, and the nature of the services to be provided; and
  - b. No consultant of equal experience and qualifications is available for a lesser amount.
- After the open selection process, the HPO must approve the qualifications of the consultant before the hiring process is completed. Consultants must meet the requirements of **36 CFR 61**, when required (see Appendix K: Federal Requirements for Principal Investigators). Consultants who have failed to perform adequately on past preservation projects will not be approved (whether the project was funded by the DC HPO or the project was reviewed by the HPO in the course of administering District and Federal preservation programs in the District of Columbia). **The subgrant recipient is cautioned not to make commitments to any parties prematurely as this may constitute a violation of fair procurement standards.**
- The subgrant recipient **may not** sign contracts with consultants, suppliers, or contractors for any aspect of project work until all of the following steps have been completed:
  - a. They have received written notification from the HPO that the project application has been approved for funding; and
  - b. They have been notified of the project start date -- entering into a contract prior to project approval constitutes pre-arrangement costs, which are not allowable or reimbursable;
  - c. They have received written approval from the HPO of drafts of the bid documents and contracts; and
  - d. They have submitted a written "request to hire" the selected consultant or contractor, and have received written approval of their choice of consultant or contractor from the HPO.

#### **A Final Note on Procurement**

Because the procurement process can be very time consuming, and because this is a critical part of getting any project off the ground, the HPO will make every effort to review bid and contract documents as quickly as possible. It is recommended that subgrantees call the HPO when they are ready to send documents or contracts for approval, and then to fax the documents to 202-741-5246. Verbal approval of bid and contract documents is often given over the telephone and followed with written notification. This approach can save many days over sending documents back and forth through the mail. Procurement documents may also be submitted to the HPO electronically via e-mail (in MSWord format). Refer to the e-mail contact information given on page 1. **Do not hesitate to contact the HPO Grants Specialist with any questions about procurement.**

## Appendix C: Preparing Progress Reports

One of the monitoring procedures for subgrants is the quarterly submission of Progress Reports (see Appendix I, and Exhibit 1). Progress Reports are required for the HPO to stay informed of the status of the project, any delays or difficulties, and the degree of completion in each quarter. The Progress Report form is included in this Manual (see Exhibit 1). The entire form should be completed thoroughly and accurately.

- Fill in the blanks for subgrantee name, subgrant name, subgrant number, and period covered.
- Provide an estimate of **project costs** and **subgrant** funds expended during the quarter, and to date. Subgrantees should keep a project budget spreadsheet for their records that identifies approved line-items and amounts. This will also help to estimate the percentage of work completed on the project during the quarter and to date.
- Survey projects, either Architectural & Historical or Archaeological, should estimate the number of properties and/or acres surveyed. If these do not apply to your project, write “NA” in the space provided.
- All projects should indicate if the full subgrant amount awarded to the project will be used, and if not, the amount anticipated that will be unused. This information assists the HPO in planning for the redistribution of any unused funding.
- Projects that will produce a “product” such as a National Register nomination, brochure, publication, archaeology report, etc. should provide an estimated date when a draft of the product will be submitted to the HPO. Note that most draft products are subject to a thirty (30) day review period and therefore must be submitted a minimum of sixty (60) days in advance of the project end date.
- Indicate when the project is expected to be completed, and check the appropriate box. If the project is behind schedule, or the end date is expected to go beyond the original deadline, provide an explanation in the second narrative question regarding the project’s delay. **Note that providing an estimated completion date that is after the original deadline does not constitute an extension request.** For example, if the original deadline is April 30 and the project will not be finished until May 30, the subgrantee should contact the HPO to discuss the circumstances, and must submit a letter with an explanation and request for an extension of the project end date.
- **IMPORTANT:** Provide a detailed list, summary, or explanation of the work that was completed in the quarter, and indicate the work items that remain to be accomplished. Remember that certain intangible work items such as procurement and contracting do constitute progress and should be reported. You should consult the award agreement to assess the progress of your project based on the work items that were enumerated in the initial paperwork.
- **IMPORTANT:** Discuss any difficulties or delays to the project, particularly ones that affect the timetable, budget, or final product. If serious problems have arisen, contact the HPO immediately.

Subgrant recipients, particularly Project Coordinators, should be aware that these reports are a strict requirement of the subgrant award. **Timely submission of reports is very important; late or inadequate reports may result in corrective action such as withholding reimbursement requests, requiring monthly progress reports, or even termination of the subgrant.** Please note that poor performance or adherence to reporting requirements will affect the ability of the subgrantee to obtain future HPF grant awards. It is the responsibility of the subgrantee to abide by the requirements of the grant and meet the progress monitoring deadlines.

## Appendix D: Preparing Reimbursement/Advance Requests

### Introduction

Requests for reimbursement and/or advances must be arranged in an organized manner in order for the HPO to understand and process. To assist in this process, the *HPO Grants Manual* contains a **Reimbursement Request Form**, **Advance Request Form**, and a **Liquidation of Advanced Funds** forms. These forms are to be used by all HPF subgrant recipients. The following instructions explain the use of these forms and answers many commonly asked questions concerning the submission of reimbursement and advance requests. Additional questions should be addressed to the HPO Grants Specialist by calling 202-442-8835.

### General Instructions for Reimbursements

Reimbursements or “claims” must include documentation adequate to prove that each expense has been incurred and subsequently paid. Proof that an expense has been incurred can be in the form of copies of invoices, personnel time sheets, or cash receipts. Copies of checks or other payment instruments are required to verify that such costs have actually been paid. Because HPF subgrants are paid out on a reimbursement basis, it is important to be able to prove that project costs have been incurred and paid.

Claims should be organized according to the expense categories given in the approved budget contained in the subgrant agreement. The documentation for costs in each category should be assembled into a stapled packet. Each packet should be attached to the Reimbursement Request Form in the order of the line-items in the approved budget. The total dollar amount for each category should be entered onto the Reimbursement Request Form that serves as the cover sheet for the claim.

**Note that reimbursement may only be sought for items covered by the budget in the agreement.** For example, if the agreement includes a line-item for personnel costs but not for fringe benefits, then fringe benefits may not be submitted for reimbursement. The only exception to this rule is newspaper advertisement costs, which may be claimed for reimbursement if required in the procurement process, regardless of whether these costs were included in the original project budget.

For items paid for by check, note the check number on the individual expense documents. Copies of checks should be attached to the individual expense documents (i.e., invoice, cash receipt, time sheet, etc.) to which they relate. Authorized agencies may present check verification printouts obtained from their banking institutions or financial or accounting offices in lieu of checks, if special arrangements have been previously made with the HPO. Because obtaining canceled checks from the bank often takes more than 30 days, the HPO will allow subgrantees to submit photocopies of uncanceled checks in order to expedite the reimbursement process. The subgrantees must remember to photocopy the check before it is sent to the contractor for payment.

It is difficult for the HPO to process Reimbursement Requests that do not have the required documentation. Please claim only those items for which proper documentation has been presented unless you have been instructed to do otherwise by the HPO. Often, an invoice, receipt, or other piece of documentation lists several expenses, only some of which relate to the subgrant project. In such cases, use a yellow marker to highlight those costs for which reimbursement is being requested.

### Assembling Reimbursement Requests

The Reimbursement Request form contains a list of allowable expense categories. These categories relate to the estimated budget appearing in the award agreement. When assembling your claim, use only those expense categories contained in this budget. If you have incurred costs in other categories, contact the HPO so that your budget can be amended, if appropriate. The budget categories are explained in the following text.

### Personnel

This category includes the wage expenses of paid staff, but not the hours donated by volunteers. Time sheets are required for all paid personnel expenses (see Exhibit 5: Time Work Record). Copies of time sheets must be prepared and signed by each person involved in the project (other than private contractors working on a set-fee basis). They must also be countersigned by the project supervisor. Each individual time sheet must include the dates for which

each person worked on the project, the number of hours worked on each date, and the hourly rate applicable for each worker. Subgrantees may use their own forms if they provide all of the necessary information, or they may use copies of the sample form enclosed. Copies of payroll checks must also be provided for all paid personnel.

### **Fringe Benefits**

This category includes FICA, insurance premiums, etc.; copies of insurance bills, and payroll deductions are required to document such expenses. Fringes are usually calculated as a percentage of salary costs.

### **Travel**

This category includes hotel bills, mileage charges, etc. Copies of travel vouchers or other internal paperwork normally used by the subgrant recipient to verify mileage costs and other travel expenses incurred by project personnel must be submitted to the HPO. This paperwork should give the mileage figures and the date that the mileage was accumulated. Note that mileage claims cannot exceed the rate of the currently approved Federal rate. Current Federal rates can be found on the General Services Administration website at [www.gsa.gov](http://www.gsa.gov).

### **Supplies**

This category includes such items as office supplies, photocopies, and long distance telephone calls that are necessary to complete the project, as well as construction materials that may be used on development projects. Copies of invoices or cash receipts for all supplies or services purchased as part of the subgrant are required. Photocopies made on an office copier or coin-operated machine require no receipt, but should be documented somehow; this is best done by including a note in the claim, e.g. "23 copies made at \$.10/copy = \$2.30, made at Martin Luther King Public Library on January 15."

### **Contractual**

This category covers contractual expenses, i.e., the cost of professionals (consultants or contractors) engaged to work on the project on a contractual basis. A copy of the signed contract must be on file with the HPO.

### **Publication**

This category includes the costs of preparing, typesetting, and printing, a publication under the subgrant project, as well as the costs of advertising invitations to bid in local and regional newspapers. Copies of all invoices and checks associated with any subgrant project publication or advertisement must be presented for reimbursement.

### **Volunteer**

This category includes the hours donated by volunteers. Time sheets are required for all volunteer personnel (**see** Exhibit 5: Time Work Record). Copies of time sheets must be prepared and signed by each person involved in the project (other than private contractors working on a set-fee basis). They must also be countersigned by the project supervisor. Each individual time sheet must include the dates on which each person worked on the project, the number of hours worked on each date, and the hourly rate applicable for each worker. **Note** that volunteer time is valued at current minimum wage unless other arrangements have been made with the HPO. Subgrantees may use their own forms if they provide all of the necessary information, or they may use copies of the sample form enclosed.

### **Other**

Items not covered by any of the above should be included in this category with copies of checks for all items and explanations for these items. **Note that indirect costs are not allowable on any project under any circumstances**, unless the subgrantee has made previous arrangements with the HPO for the reimbursement of itemized overhead items.

### **Total Costs**

This entry simply represents the sum of the above entries.

### **Reimbursement Requested**

The figure obtained by adding up the total requested for each line-item. **Note** that program regulations do not allow the HPO to round figures to the next higher dollar amount or to reimburse cents; **figures must be rounded down to the nearest whole dollar.**

### **Submitting the Reimbursement Request**

Prepare the Reimbursement Request Form and the required documentation in an orderly and easily understandable manner. It is the responsibility of the subgrant recipient to submit complete and accurate claims (Reimbursement Request Forms with proper and adequate documentation) prepared in accordance with the instructions given by the HPO. Failure to prepare claims properly may cause long delays in the reimbursement process. In extreme cases, the HPO may return the claim unpaid for reorganization and resubmission. Remember to include all copies of invoices, cash receipts, and checks for which reimbursement is being requested. Reimbursement checks cannot be disbursed to participating agencies without the proper documentation on file.

When completing the Reimbursement Request Form, please be sure to complete all columns, as well as all of the lines at the top of the page. Completely filling out both columns will help the subgrantee to track total project expenditures and compare them to the approved budget line-items in the award agreement. Remember that a difference of more than 10% or \$250, whichever is greater, for any single line-item requires written notification of the HPO.

### **General Instructions for Advances**

Upon approval by the HPO, subgrantees are allowed to request up to 20% of their grant funds as an advance to help with start-up costs. Advances must be limited to the minimum amounts needed to carry out the purposes of the approved project and must be expended within 30 days of receiving the advanced funds.

Subgrantees must document expending all of the advanced funds by completing and submitting to the HPO a "Liquidation of Advanced Funds" form 30 days after receiving the advanced funds. No additional subgrant funds will be released to the subgrantee until the paperwork liquidating the advanced funds is received and approved by the HPO.

Any and all monies advanced to the subgrantee must be deposited in a bank with FDIC insurance coverage and the balances exceeding the FDIC coverage must be collaterally secure.

### **General Instructions for Completing a "Liquidation of Advanced Funds" Form**

The instructions for completing a Liquidation of Advanced Funds form are the same as for a Request for Reimbursement except that there will be no matching funds for which to account.

## Appendix E: Allowable and Unallowable Costs

The following is a list of possible expenditures or costs associated with many projects. The National Park Service has determined which of these items are **allowable** project costs and which items are **unallowable**. Only allowable costs may be included in the project budget and claimed for reimbursement. **Note** that some items **may be allowable** if certain conditions are met. These conditions must generally be spelled out in the project application, and will be included in the award agreement. Subgrantees may not claim for reimbursement any items or project costs that were not identified in the award agreement without written permission from the HPO.

### Accounting

The cost of establishing and maintaining accounting and other information systems required for the management of subgrant programs is **allowable**. This includes costs incurred by central service agencies for these purposes. However, the cost of maintaining central accounting records required for overall District government purposes, such as appropriation and fund accounts by the Treasurer, Comptroller, or similar officials, is considered to be a general expense of government, and is **unallowable**.

### Advertising

Advertising media include newspapers, magazines, radio and television programs, direct mail, trade papers, etc. The advertising costs **allowable** are those that are solely for:

- Recruitment of personnel necessary for the project;
- Solicitation of bids for the procurement of goods and services required for work on the project;
- Notices required by Federal or District regulations pertaining to the project; and
- Other purposes specifically provided for in the award agreement.

### Audit Service

The cost of audits necessary for the administration and management of functions related to subgrant programs is **allowable**.

### Bad Debts

Any losses arising from uncollectible accounts and other claims, and any collection costs, are **unallowable**.

### Bonus Payments

Bonus payments of any kind are **unallowable**.

### Churches

Due to Federal “separation of church and state” regulations, direct subgrant/grant assistance to active religious organizations, or for purposes of construction and/or acquisition of properties that are primarily used for religious purposes, is **unallowable**.

### Communications

Communication costs incurred for telephone calls or service, teletype service, wide area telephone service (WATS), centrex, telpak (tie line), postage, messenger service, and similar expenses necessary for and directly related to the grant project are **allowable**. However, these costs must be adequately documented with copies of bills, receipts, or other documents that illustrate clearly the connection between the grant project and the charges incurred. If reimbursement for such charges is anticipated, contact the HPO for specific instructions; **note** that many subgrantees find that it is not cost-effective to seek reimbursement for any but long-distance telephone expenses.

### Compensation for Personal Services

Compensation for personal services includes all remuneration, paid currently or accrued, for services rendered during the period of performance under the award agreement, including but not necessarily limited to wages, salaries, and supplementary compensation and benefits. The costs of such compensation are **allowable** to the extent that they are adequately documented and reasonable for the services rendered. For private nonprofit organizations and local governments, documentation will include time and attendance records for each employee’s work on the

project. Educational institutions must document the efforts of employees who are paid on an hourly basis in the same manner, but can use an OMB-approved time-distribution system to document effort of faculty members. In addition, all subgrantees must provide copies of payroll checks unless they are audited annually, and have worked out an alternative system of documentation with the HPO under appropriate OMB standards. **See** also “Employee Fringe Benefits.”

### **Conferences**

Costs associated with attendance at conferences and seminars are **unallowable** unless approved in advance by the HPO. Such costs may be approved only when they provide necessary when the activity will provide a subgrantee with new or unique training that is directly related to and useful for the completion of the project.

### **Contingencies**

Contributions to a contingency reserve or any similar provision for unforeseen events are **unallowable**.

### **Curation**

The cost of curation of artifacts is **unallowable**, except in those cases where archaeological artifacts were discovered in the course of a subgrant-assisted project and attention is urgently required to prevent the deterioration or loss of the artifacts. In such instances, limited curation costs may be allowable, but only with prior permission from the HPO. In no case will the HPO approve such costs in amounts greater than **10%** of the total project budget.

### **Depreciation**

Given the relatively short term of award agreements, depreciation is normally considered to be an **unallowable** project cost. Subgrantees who have what they consider to be unusual situations should contact the HPO.

### **Employee Fringe Benefits**

Costs identified under the two items below are **allowable** to the extent that the total compensation for subgrantee employees is reasonable as defined in “Compensation for Personal Services” (above):

- Benefits in the form of regular compensation paid to employees during periods of authorized absences from the job, such as for annual, sick, court, or military leave, if:
  - a. They are provided pursuant to an approved leave system; and
  - b. The cost thereof is equitably allocated to all related activities, including grant programs.
- Benefits in the form of employers’ contributions or expenses for social security, employees’ life and health insurance plans, unemployment insurance coverage, worker’s compensation insurance, pension plans, and severance pay, provided that such benefits are granted under approved plans and are distributed equitably to subgrant programs and to other activities.

### **Entertainment**

The costs of amusement, social activities, and related incidental expenses are **unallowable**.

### **Equipment**

Single tangible items costing in excess of \$300 are considered to be equipment. The purchase of equipment using grant funds or local matching funds is **unallowable** without written permission from the HPO.

### **Exhibits**

The costs of temporary exhibits relating specifically to the subgrant project, its accomplishments, or results **may be allowable**, but written permission from the HPO must be received before such costs are incurred.

### **Fines and Penalties**

The costs resulting from failure to comply with Federal, District, or local laws are **unallowable**.

### **Fund Raising**

The costs associated with organized fund raising and solicitations are **unallowable**.

### **Furnishings**



For rehabilitation/restoration projects, the cost of furnishings is **allowable** only when these furnishings are permanently attached items that are integral to building construction, are of documented historic design, and/or are reconstructed based upon documented original furnishings (e.g., ceiling and wall-mounted lighting fixtures, theater seats in a theater rehabilitation, etc.). The purchase of movable pieces of furniture is **unallowable**.

### **Insurance**

The costs of hazard and liability insurance to cover personnel or property directly related to the subgrant project are **allowable** during the grant period.

### **Interest**

Interest on borrowings (such as mortgages and other loans), and the legal and professional fees paid in connection therewith, are **unallowable** except when authorized by Federal legislation.

### **Interpretive Signs**

The costs of purchasing and installing (but not maintaining) a minimum number of interpretive or informational markers or signs at HPF grant-assisted historic buildings and structures and archaeological sites **may be allowable**, but only with written permission from the HPO. **See** also "Project Signs."

### **Landscaping**

For development projects, the costs of landscaping are **allowable** only if they fall under one of the following categories:

- The historically documented restoration or reconstruction of gardens, grounds, and grading in order to attain an historic appearance and a compatible setting for an historic property;
- Grading for purposes of drainage, building safety, and protection; or
- Improvements necessary to facilitate access for the disabled.

**Note** that the costs of seeding, sodding, and installing decorative plantings are **unallowable**.

### **Legal Expenses**

The cost of legal expenses required in the administration of a subgrant is **allowable**.

### **Lobbying**

The costs associated with activities or communications designed to influence in any manner a Federal, District, or local legislator or official are **unallowable**.

### **Materials and Supplies**

The cost of materials and supplies necessary to carry out the subgrant project is **allowable**. Purchases made specifically for the subgrant project should be charged at their actual prices after deducting all case discounts, trade discounts, rebates, and allowances received by the subgrantee. Withdrawals from general stores or stockrooms should be charged at cost under any recognized method of pricing consistently applied. Incoming transportation charges are a proper part of material cost. Materials and supplies charged as a direct cost must include only the materials and supplies actually used for the performance of the contract or subgrant, and due credit should be given for any excess materials or supplies retained or returned to vendors.

### **Meals**

The cost of meals for subgrantee employees, consultants, and volunteers is **unallowable** except when such persons are on approved travel status in conjunction with activities directly related to the subgrant project, and these people are being paid a “per diem” pre-approved by the HPO. **See** “Travel.”

### **Memberships**

The costs of memberships in professional or technical organizations are **unallowable**, except when **all** of the following are true:

- The benefit from the membership is directly related to achieving project objectives;
- The expenditure is for agency membership, not individual membership;
- The cost of the membership is reasonably related to the value of the services or benefits received; and
- The expenditure is not for membership in an organization that devotes a substantial part of its activities to influencing legislation.

### **Payroll Preparation**

The cost of preparing payrolls and maintaining necessary wage records is **allowable**, as long as appropriate cost documentation is supplied.

### **Personnel Administration**

The costs of recruitment, examination, certification, classification, training, establishment of pay standards, and related activities for the Historic Preservation Fund subgrant are **allowable**.

### **Plans and Specifications**

For development projects, the costs of producing architectural plans and specifications, shop drawings, and/or other materials required to document development project work according to the *Secretary of the Interior’s Standards* are **allowable**. However, these should be identified as a discrete line items in the project budget.

### **Preagreement Costs**

Costs incurred prior to the project starting date are **unallowable**, except with written approval of the HPO and the NPS.

### **Procurement Services**

The costs of all procurement services, including the solicitation of bids, the preparation and award of contracts, and all phases of contract administration in providing goods, facilities and services for the subgrant are **allowable**.

### **Project Signs**

The cost of making project signs that acknowledge District and Federal grant assistance, and the cost of installing these signs at project sites, are **allowable**. **See** Appendix H: Acknowledgment of District and Federal Assistance.

### **Rent**

Rental costs for space used to complete the project are **allowable** during the subgrant period with prior approval from the HPO and NPS. When only a portion of the rented space is used for subgrant activities, the allowable costs must be computed on a pro rata basis.

### **Revolving Funds**

The use of HPO subgrant funds for revolving fund activities is **unallowable**.

### **Supplies**

**See** “Materials and Supplies.”

### **Training and Education**

Subgrantees are expected to possess the knowledge and skills necessary to complete their projects when the subgrant award is made. Consequently, training and education costs for employee development normally are **unallowable**. However, such costs **may be allowable** if the training is of a unique or unusual type not ordinarily available, and if

the training is directly related to the grant project and will improve the quality of the final product, however, the subgrantee must have written approval of such costs before they are incurred.

### **Transportation**

Costs incurred for freight, cartage, express postage, and other transportation costs relating to goods either purchased, delivered, or moved from one location to another are **allowable** when necessary for and directly related to the subgrant.

### **Travel**

In-state travel costs are **allowable** when the travel involved is directly related to the accomplishments of the project, when the subgrantee's budget includes a line-item for this cost category. Mileage charges cannot exceed the rate of the current Federal rate as determined by the General Services Administration. Current rates can be found on the General Services Administration website, [www.gsa.gov](http://www.gsa.gov). Out-of-state travel costs of any kind are **unallowable** unless prior written approval is received from the HPO. **See** also "Conferences."

## **Appendix F: Fiscal Requirements**

Since the HPO provides financial assistance to subgrant recipients, it is required by District and Federal government regulations to include the following in all subgrant agreements and contracts:

- The District, or its designee, will have the right to conduct financial audits of the grant recipient;
- Audits will be performed in accordance with compliance guidelines established by the District;
- Grant recipients must agree to comply with all reporting requirements prescribed by the District; and,
- All grant recipients must provide a copy of their audit review to the HPO for any fiscal year concurrent (in whole or in part) with the period of the HPO grant.

## Appendix G: Press Releases

Though the HPO provides public notification of subgrant awards, subgrantees are encouraged to issue press releases of their own at appropriate times during the course of their work. All such releases must be reviewed and approved in advance by the HPO. This can be done by mailing, faxing, or even by reading to the HPO over the telephone the text of the proposed press release. Clearance can usually be given immediately if the release contains the proper information.

The HPO checks the accuracy of information pertaining to historical resources and government-sponsored preservation programs, as well as the acknowledgment of financial assistance from the D.C. HPO and the Historic Preservation Fund Program of the National Park Service. The wording of the acknowledgment should be as follows:

- This project has been funded in part by a grant from the U.S. Department of the Interior, National Park Service Historic Preservation Fund, administered by the District of Columbia's Historic Preservation Office.

**Note** that the additional Federal information and wording required in all grant publications (listed in Appendix H: Acknowledgment of District and Federal Assistance) is not required in a press release.

## **Appendix H: Acknowledgment of District and Federal Assistance**

During the subgrant period, any publication, videotape, audiotape, or other printed materials paid for with HPF grant funds, or describing grant/subgrant funded activities, **must** acknowledge the assistance of the District and Federal government. The following text must be included in the acknowledgments:

- This project has been funded in part by a U.S. Department of the Interior, National Park Service Historic Preservation Fund grant administered by the District of Columbia's Historic Preservation Office.

The following text **must** appear somewhere in the body of the publication:

- This program has received Federal financial assistance for the identification, protection, and/or rehabilitation of historic properties and cultural resources in the District of Columbia. Under Title VI of the Civil Rights Act of 1964 and Section 504 of the Rehabilitation Act of 1973, the U.S. Department of the Interior prohibits discrimination on the basis of race, color, national origin, or disability in its Federally assisted programs. If you believe that you have been discriminated against in any program, activity, or facility as described above, or if you desire further information, please write to: Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street, N.W., Washington, D.C. 20240.
- This [type of publication] has been financed in part with Federal funds from the U.S. Department of the Interior, National Park Service. However, the contents and opinions contained in this publication do not necessarily reflect the views or policies of the U.S. Department of the Interior, nor does the mention of trade names or commercial products constitute endorsement or recommendation by the U.S. Department of the Interior.

**Note** that only the relevant portions of the required statement need to be included, e.g., if there are no commercial products listed or mentioned, then that part of the statement may be omitted.

**Note that the National Park Service and the D.C. Historic Preservation Office will deny reimbursement for projects that fail to make proper acknowledgment of Federal grant/subgrant support, the source of assistance, and the agency providing grant administration.**

## Appendix I: Monitoring Procedures for Subgrants

### Project Initiation Procedures

- I. A committee assembled by the D.C. HPO selects projects to be assisted with the District's share of the annual Federal Historic Preservation Fund allotment.
- II. The HPO completes paper work to initiate the subgrant.
  - The HPO prepares the award agreement based on the committee's direction and the information contained in the subgrantee's project proposal.
  - The HPO sends the applicant an award agreement, offering subgrant assistance under certain stated terms; the subgrant offer expires 30 days from the date of the letter if the subgrantee fails to respond.
  - The subgrantee accepts the subgrant and all conditions, thus obligating both the District and the subgrantee according to the terms of the District's award agreement.
  - Within four weeks of entering into the agreement, the subgrantee meets with HPO staff to ensure that all subgrant requirements and conditions are fully understood. The subgrantee then may begin work.
  - Within sixty (60) days of the Start-up Meeting, any required procurement must be initiated. **See Appendix B: Procurement.**

### Project Monitoring Procedures

- I. The subgrantee must provide written reports on the status of the project on a regular basis. **See Part I, The Grant Process Step By Step, and Exhibit 1, Step 8, Subgrantee Progress Report.**
  - The Subgrantee Progress Report is due quarterly according to the schedule on the Report, unless the HPO has requested monthly reports. **See Part I, The Grant Process Step By Step, Step 8, and Exhibit 1, Subgrantee Progress Report.**
  - The HPO will review the Subgrantee Progress Reports to ensure subgrantee compliance with all conditions, and to verify that adequate progress is being made on the subgrant project. **Note** that financial claims cannot be reimbursed without Subgrantee Progress Reports on file.
  - The HPO will prepare agreement amendments if necessary. **See Part I, The Grant Process Step By Step, Step 8.**
  - **Subgrantees not in compliance with these requirements due to reporting problems (such as failure to submit Progress Reports, attend meetings, supply financial documentation, etc.) will be required to take corrective action delineated in a letter from the HPO. See "Corrective Action/Termination" below.**
- II. Mid-Point Review
  - When the midpoint of the subgrant project is reached, the subgrantee must give a report of the work completed to date to demonstrate the progress being made on the project. Necessary HPO staff will attend this meeting to determine whether the subgrantee is in compliance with all conditions and requirements.
  - **Subgrantees not in compliance due to performance problems (such as failure to make adequate progress, or to comply with the *Secretary of the Interior's Standards*) will be required to take corrective action delineated in a letter from the HPO. See "Corrective Action/Termination."**
- III. Draft Version of Report or Product
  - The draft version of the final report must be submitted to the HPO sixty (60) days before the project end date (the exact date is specified in the agreement). Within thirty (30) days of submission, the HPO will review the draft and provide the subgrantee with a written request for specific revisions and/or corrections.
  - **Subgrantees not in compliance with HPO and NPS requirements will be required to take corrective action delineated in a letter from the HPO. See "Corrective Action/Termination."**

## Project Close-Out Procedures

- I. The subgrantee must submit the completed project within the time frame specified in the agreement.
  - The completed project will be inspected and reviewed by the HPO for compliance with the *Secretary of the Interior's Standards* and other District and/or Federal requirements. If the project is acceptable, the HPO will certify in writing that the project has been completed successfully.
  - Projects or aspects of work deemed unacceptable will be made known to the subgrantee with a letter indicating the necessary corrective actions and/or remedial work necessary and the time frame in which the corrections must be made.
  - **If the subgrantee fails to make the requested changes, the HPO will take the appropriate action. See "Corrective Action/Termination."**
- II. The subgrantee must submit all final reimbursement requests within the time frame specified in the agreement.
  - The HPO reserves the right to refuse payment of allowable project expenses that are not submitted by the deadline specified in the agreement.
  - The HPO will withhold payment of **15%** of the subgrant funds until the final project is submitted and approved.
  - Within thirty (30) days of the final project being approved, the final reimbursement will be processed.

## Corrective Action/Termination

- I. If the HPO determines that the subgrantee is not in compliance with the terms and conditions of the subgrant due to reporting problems (such as failure to submit Progress Reports, attend meetings, supply financial documentation, or respond to requests from HPO) or performance problems (such as the failure to make adequate progress toward timely completion of the project, failure to make requested changes, or failure or inability to produce work which meets the *Secretary of the Interior's Standards*), the subgrantee will be required to take corrective action.
  - The HPO will advise the subgrantee of problems and detail the reasons for the requested corrective action in a letter.
  - Each subgrant is a unique project with different circumstances; the HPO handle each subgrant accordingly. The specific details of the corrective action requested will be project- and situation-specific.
  - The subgrantee will have thirty (30) days in which to respond to any correspondence. If no response is made, the initial letter will be followed with more attempts to contact or communicate with the subgrantee.
  - If no sufficient response is received, the HPO (with NPS approval), may initiate termination proceedings.
- II. Subgrants may also be terminated when both parties agree that the continuation of the project would not produce beneficial results commensurate with the further expenditure of funds. Termination conditions and effective dates will be agreed upon by both parties. Subgrantees will be required to **refund** to the District any subgrant payments made for projects which are not completed, or which do not meet District and Federal guidelines and requirements. The HPO will determine whether any work produced through a terminated subgrant constitutes an acceptable product eligible for Federal reimbursement.
  - The HPO will order the subgrantee to return any funds previously received which were not expended appropriately in the process of creating an acceptable product.
  - If the subgrantee fails to return the funds, the HPO will consult legal counsel, and may ultimately take legal action to recover the funds.



## Appendix J: Federal Requirements for Principal Investigators

The following guidelines are taken from **36 CFR 61 Section 61.5**, which outlines the minimum educational and professional requirements for someone to meet Federal qualification standards for conducting work in certain fields. In the following definitions, a year of full-time professional experience need not consist of a continuous year of full-time work, but may be made up of discontinuous periods of full-time or part-time work adding up to the equivalent of a year of full-time experience.

Depending on the type of project, the Principal Investigator will need to meet the requirements in one of these five fields, with certain exceptions. Projects such as historic sites and structures inventories, National Register historic district nominations, historic context studies, historic structure reports, and cultural landscape reports ordinarily require a Principal Investigator who meets the criteria for History or Architectural History. Archaeological investigations, surveys, and National Register nominations for archaeological sites require a Principal Investigator who meets the criteria for Archaeology. Projects such as rehabilitation of historic buildings or structures ordinarily require a Principal Investigator who meets the criteria for Architecture, especially if plans and specifications are needed for the project. However, certain types of simple rehabilitation projects, which either have plans and specifications in place or do not require them, may get by with a Principal Investigator who does not meet these criteria, such as an experienced general contractor. Any questions about the qualifications for Principal Investigators should be directed to the HPO.

### A. History

The minimum professional qualifications in history are a graduate degree in history or a closely related field; **or** a bachelor's degree in history or a closely related field **plus** one of the following:

1. At least two years of full-time experience in research, writing, teaching, interpretation, or other demonstrable professional activity with an academic institution, historical organization or agency, museum, or other professional institution; **or**
2. Substantial contribution to the body of scholarly knowledge in the field of history through research and publication.

### B. Architectural History

The minimum professional qualifications in architectural history are a graduate degree in architectural history, art history, historic preservation, or closely related field, with course work in American architectural history; **or** a bachelor's degree in architectural history with a concentration in American architecture; **or** a bachelor's degree in architectural history, art history, historic preservation, or a closely related field **plus** one of the following:

1. At least two years of full-time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; **or**
2. Substantial contribution to the body of scholarly knowledge in the field of American architectural history through research and publication.

### C. Archaeology

The minimum professional qualifications in archaeology are a graduate degree in archaeology, anthropology, or a closely related field, **plus**:

1. At least one year of full-time professional experience or equivalent specialized training in archaeological research, administration, or management; **and**
2. At least four months of supervised field and analytic experience in general North American archaeology; **and**
3. Demonstrated ability to carry research to completion.

In addition to these minimum qualifications, a professional in **prehistoric archaeology** shall have at least one year of full-time professional experience at a supervisory level in the study of archaeological resources of the prehistoric period. A professional in **historic archaeology** shall have at least one year of full-time professional experience at a supervisory level in the study of archaeological resources of the historic period.

**D. Architecture**

The minimum professional qualifications in architecture are a professional degree in architecture **plus** at least two years of full-time professional experience in architecture; **or** a state license to practice architecture.

**E. Historical Architecture**

The minimum professional qualifications in historical architecture are a professional degree in architecture; **or** a state license to practice architecture **plus** one of the following:

1. At least one year of graduate study in architectural preservation, American architectural history, preservation planning, or a closely related field **and** at least one year of full-time professional experience on preservation and restoration projects; **or**
2. At least two years of full-time professional experience on preservation and restoration projects.

Experience on preservation and restoration projects shall include detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects.



# SUBGRANTEE PROGRESS REPORT

District of Columbia, Office of Planning  
Historic Preservation Office (HPO)

Subgrantee: \_\_\_\_\_ Grant Number: \_\_\_\_\_  
Project Name: \_\_\_\_\_ Period Covered: \_\_\_\_\_

Please answer all pertinent questions as accurately as possible, provide detailed responses to the questions below, and sign the form. Mail or fax this form to the HPO Grants Manager quarterly unless otherwise approved or instructed by the HPO.

	During This Reporting Period:	Total To Date:
Estimated total project funds expended:	_____	_____
Estimated total Federal funds expended:	_____	_____
Estimated % of work completed:	_____	_____
Number of properties surveyed:	_____	_____
Number of sites documented:	_____	_____
Acres surveyed at reconnaissance level:	_____	_____
Acres surveyed at intensive level:	_____	_____

Estimated amount of Federal funding to be used:	_____
Estimated amount of Federal funding, if any, that will be unused:	_____
Date when draft product will be submitted for review:	_____

The grant project is:  on schedule  30 days or less behind schedule  over 30 days behind schedule

Please give a detailed summary of all work completed during this reporting period:

Have any difficulties been encountered which might affect the scope of work, final product, budget, or timetable? List the work items remaining to be completed. If the project is behind schedule, please provide a detailed explanation (attach additional page if necessary).

\_\_\_\_\_  
Signature -- Agent of Sponsoring Organization

\_\_\_\_\_  
Date

Mail to: Grants Specialist  
D.C. Historic Preservation Office  
801 North Capitol St., NE, Suite 3000  
Washington, DC 20002  
(202) 442-8835 - Phone  
(202) 741-5246 - Fax

# REIMBURSEMENT REQUEST FORM

District Of Columbia, Office of Planning  
 Historic Preservation Office

Subgrantee: \_\_\_\_\_  
 Project Name: \_\_\_\_\_  
 Grant #: \_\_\_\_\_

Total Grant Amount: \_\_\_\_\_  
 Total of Previous Claims: \_\_\_\_\_  
 Total for This Claim: \_\_\_\_\_  
 Grant Funds Remaining: \_\_\_\_\_

CLAIM #	Matching Cash Funds Used This Claim	Matching In-Kind Used This Claim	HPF Funds Used This Claim
<input type="checkbox"/> Personnel			
<input type="checkbox"/> Fringe Benefits			
<input type="checkbox"/> Travel			
<input type="checkbox"/> Supplies			
<input type="checkbox"/> Design Fees			
<input type="checkbox"/> Advertisement / Publication			
<input type="checkbox"/> Construction / Contractual			
<input type="checkbox"/> Other			
TOTAL			
<b>Reimbursement Requested</b>	<b>.00</b>	<b>.00</b>	<b>.00</b>

Based on my knowledge of this project, I certify that the project costs listed on this form are adequately documented, and I believe that these costs are reasonable and appropriate for the work completed to date.

\_\_\_\_\_  
 Signature -- Agent of Sponsoring Organization

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Signature -- HPO Grants Specialist

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Signature -- State Historic Preservation Officer

\_\_\_\_\_  
 Date

# ADVANCE REQUEST FORM

District Of Columbia, Office of Planning  
 Historic Preservation Office

Subgrantee: \_\_\_\_\_  
 Project Name: \_\_\_\_\_  
 Grant #: \_\_\_\_\_

Total Grant Amount: \_\_\_\_\_  
 Total of Previous Claims: \_\_\_\_\_  
 Total for This Advance: \_\_\_\_\_

ADVANCE #	HPF Funds Requested This Advance
<input type="checkbox"/> Personnel	
<input type="checkbox"/> Fringe Benefits	
<input type="checkbox"/> Travel	
<input type="checkbox"/> Supplies	
<input type="checkbox"/> Design Fees	
<input type="checkbox"/> Advertisement / Publication	
<input type="checkbox"/> Construction / Contractual	
<input type="checkbox"/> Other	
TOTAL	
<b>Advance Requested</b>	<b>.00</b>

ADVANCED FUNDS MUST BE LIQUIDATED WITHIN 30 DAYS OF RECEIPT.

A "LIQUIDATION OF ADVANCED FUNDS" MUST BE COMPLETED AND SENT TO THE HPO AT THE END OF 30 DAYS ALONG WITH RECEIPTS SHOWING THE DISPERSEMENT OF ALL ADVANCED FUNDS.

NO OTHER FUNDS WILL BE RELEASED UNTIL ALL ADVANCED FUNDS ARE LIQUIDATED AND REPORTED.

NO MORE THAN 15% OF GRANT FUNDS MAY BE ISSUED AS ADVANCES.

Based on my knowledge of this project, I certify that the project costs listed on this form are adequately documented, and I believe that these costs are reasonable and appropriate for the work completed to date.

\_\_\_\_\_  
 Signature -- Agent of Sponsoring Organization

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Signature – HPO Grants Specialist

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Signature – State Historic Preservation Officer

\_\_\_\_\_  
 Date

# LIQUIDATION OF ADVANCED FUNDS FORM

District Of Columbia, Office of Planning  
 Historic Preservation Office

Subgrantee: \_\_\_\_\_  
 Project Name: \_\_\_\_\_  
 Grant #: \_\_\_\_\_

Total Grant Amount: \_\_\_\_\_  
 Total of Advance: \_\_\_\_\_  
 Total for This Liquidation: \_\_\_\_\_  
 Grant Funds Remaining: \_\_\_\_\_

LIQUIDTION#	Advanced Funds Liquidated This Claim
[ ] Personnel	
[ ] Fringe Benefits	
[ ] Travel	
[ ] Supplies	
[ ] Design Fees	
[ ] Advertisement / Publication	
[ ] Construction / Contractual	
[ ] Other	
TOTAL	
<b>Total Liquidation</b>	<b>.00</b>

Based on my knowledge of this project, I certify that the project costs listed on this form are adequately documented, and I believe that these costs are reasonable and appropriate for the work completed to date.

\_\_\_\_\_  
 Signature -- Agent of Sponsoring Organization

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Signature – HPO Grants Specialist

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Signature – State Historic Preservation Officer

\_\_\_\_\_  
 Date

# TIME WORK RECORD

District of Columbia, Office of Planning  
 Historic Preservation Office

Name : \_\_\_\_\_  
 Position: \_\_\_\_\_  
 Project: \_\_\_\_\_  
 Grant #: \_\_\_\_\_

Hours are:      [ ] Donated      [ ] Paid by grant recipient

Date	# Hours	\$/hour	Total \$	Description of Work Done
<b>Totals</b>				

I certify that the services shown above were essential to the grant-assisted effort, that the amounts of time indicated are appropriate, that the data is correct, and that the hourly rate is reasonable for the services provided.

\_\_\_\_\_  
 Signature of Worker / Volunteer

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Signature -- Agent of Sponsoring Organization

\_\_\_\_\_  
 Date