INTRODUCTION

Historic preservation fund subgrants are administered by the State Historic Preservation Office (SHPO) of the Wisconsin Historical Society (WHS). At the federal level, the program is managed by the National Park Service (NPS), U. S. Department of the Interior. The Historic Preservation Fund (HPF) is derived from federal offshore oil leases, not from tax revenues. The Catalog of Federal Assistance number is 15.904.

Please read the complete guidelines as they summarize the regulations that apply to subgrant funded projects and the procedures to be followed. The subgrantee must be able to comply with the required completion schedule. Failure to submit an application completed in accordance with these guidelines will result in automatic rejection of that application.

This subgrant program is funded by a federal grant; therefore, numerous federal rules and regulations apply. These rules are enforced to ensure that federal dollars spent on project-related work are auditable according to federal standards. The SHPO will supply subgrantees with copies of the relevant forms, state and federal regulations summarized in this guide, upon request. However, subgrantees should be aware that the SHPO assumes no liability for the failure of any subgrantee to follow required regulations.

WHO MAY APPLY

All units of government and non-profit organizations.

Individuals and "for profit" organizations are not eligible for Certified Local Government (CLG) project types.

LETTER-OF-INTENT

Letters-of-intent to the SHPO are required for historic architecture survey and CLG projects. This letter should describe the proposed project and give the approximate amount of funds to be requested. A letter-of-intent can be a single page and will not formally obligate an organization. The letters-of-intent will be used by SHPO staff to anticipate funding requirements and to assist applicants in preparing their application. Only CLG type applications preceded by a letter-of-intent will be considered for funding. The letter-of-intent must be post-marked or received in the SHPO by September 11, 2015.

The SHPO will respond to letters-of-intent within three weeks.
**SUBGRANT FUNDING**

The SHPO plans to award a total of approximately $80,000 in Subgrants each year. Successful applicants, those that best meet the criteria established for this project period (see page 4), usually each receive subgrants ranging from $2,000 (minimum) up to $25,000 (maximum).

All project related costs are paid by the applicant/subgrantee, with periodic reimbursement of up to 75% of the award (federal reimbursement) prior to completion. The remaining 25% of the award is held until all final products are received and approved by the SHPO.

**TYPICAL SEQUENCE OF SUBGRANT ACTIVITIES**

**Prior to Beginning Work**

1. July  
   SHPO develops criteria and announces it in various Wisconsin preservation-related publications.

2. August to October  
   SHPO accepts letters-of-intent. All letters-of-intent must be postmarked or received at the SHPO office by September 11, 2015.

3. September to November  
   SHPO accepts signed applications (original plus 5 copies). They must be post marked or received at the SHPO office by November 13, 2015. Applications faxed or post marked later will not be considered.

4. November & December  
   The SHPO staff reviews all applications received for project eligibility and completeness. An analysis of each application, using the criteria established for this project period is prepared for the Historic Preservation Review Board.

5. February  
   The Historic Preservation Review Board reviews applications and approves award of subgrant funds.

6. February  
   The SHPO sends applicants written notice of subgrant award and if the award amount is different from the application, the SHPO recommended changes to the products (work program) and/or budget.

7. February to March  
   The SHPO publishes the "Consultants Needed" classified ad and determines which interested candidates are "professionally qualified."

8. March to April  
   The SHPO prepares the Memorandum of Agreement (MOA), which work program with project schedule, and budget. It is then sent to the subgrantee "contact" for their review and signing as well as forwarding it to the Financial Officer/authorized agent for the same actions.

9. March to June  
   Upon receipt of the MOA signed by the subgrantee officials, and the SHPO completes the MOA signing and prepares the State Purchase Order. In about 20 days the signed Purchase Order, MOA, qualified consultant resumes and reporting forms are sent to the subgrantee as notification that the project can begin.
**Initiation of Project Work**

Per MOA 1. The subgrantee sends approved Request for Proposals (RFP), to all qualified candidates resulting from the "Consultants Needed" ad. After the RFP deadline the subgrantee hires competitively with the assistance and prior approval of the SHPO.

Per MOA or contract 2. Once the consultant’s (principal investigator) contract is signed, project can begin. Generally the subgrantee hosts a public meeting to introduce the project, the contractor, and the SHPO Program Manager to the community.

**Monitoring the Project**

Per MOA or as needed 1. Generally, the project director is responsible for the timely and accurate completion of the work program. This includes ensuring that procurement standards are followed, products are submitted when due, bills are paid on time, and auditable records are maintained. In addition, the project director maintains regular contact with the appropriate SHPO Program Manager to ensure any project work program questions are discussed before action is undertaken.

Per MOA 2. The project director submits written progress reports and Reimbursement Requests to the SHPO.

**Project Completion**

Per MOA 1. Subgrantee hosts a public meeting to present the products to the community.

2. Final work products must be submitted to the SHPO on or before the project completion date.

Per MOA but No later than August 3. The SHPO will process the products and final reimbursement. The DHP will withhold a minimum of 25% of the federal funds until all conditions of the MOA have been met and required records have been accepted by the SHPO and NPS. **If items are submitted after the project completion date, a portion of the 25% may be kept by the SHPO due to increased administrative effort.**
**PROJECT TYPES and ELIGIBLE ACTIVITIES**

Within each **Project type** the applications are rated on how well they meet the “Subgrant Selection Criteria.” Funding is awarded based upon an application’s rank compared to other applications received of the same type.

**Historic Architecture:** Not available due to budget constraints.

**Certified Local Government** (CLG), are units of government whose historic preservation program has been certified by the state and federal government. There are only 68 such governmental entities in Wisconsin, they are: La Crosse County; plus the cities of Allouez, Appleton, Ashland, Beloit, Burlington, Cedarburg, Columbus, De Pere, Dodgeville, Eau Claire, Evansville, Fitchburg, Fond du Lac, Greendale, Hales Corners, Horicon, Janesville, Jefferson County, La Crosse, Lake Geneva, Lancaster, Lodi, Madison, Marshfield, Mazomanie, Menomonie, Mequon, Middleton, Milton, Milwaukee, Mineral Point, Monroe, Mukwonago, Neenah, Neillsville, New Berlin, New Glarus, New Holstein, New Richmond, Onalaska, Oregon, Oshkosh, Palmyra, Perry, Platteville, Portage, Racine, Rhinelander, Richland Center, Ripon, River Falls, Sheboygan, Sparta, South Milwaukee, Stevens Point, Stoughton, Thiensville, Viroqua, Washburn, Watertown, Waukesha, Waupaca, Wausau, Wauwatosa, West Allis, Westport, and Whitewater. For information about participating in the CLG program, check out “The National Park Service” Web site at [www.nps.gov/clg](http://www.nps.gov/clg) or contact Joe DeRose at (608) 264-6512.

CLGs are eligible for the projects listed in the “Subgrants Manual” on the WHS Web site. “Application Evaluation Criteria” gives the specific evaluation points and the range of eligible points possible. HPF regulations specify that at least 10% of a state's funds be awarded to CLGs, which has been about $80,000, statewide.
COMPLETION OF THE APPLICATION

Applications must propose projects that will benefit historic or archaeological resources located in Wisconsin. **Multiple grant applications** may be submitted. Each application will be evaluated independently. When completing the application, please consider the following:

**Project Types:** Select the **CLG** application based upon type of project to be done, see “Project Types” in the “Subgrants Manual” on the WHS Web site.

**Applicant:** the legal name, corresponding Federal Employer Identification Number (FEIN), and address where reimbursement checks should be mailed. See “Who may Apply” on page 1.

**Contact person:** This is usually the project director. This is the person who has authority and program knowledge to make project related decisions and will be expected to manage the project.

**Financial Officer:** This must be the person who is authorized to act on behalf of the applicant. Generally this is the person who is responsible for ensuring that funds and staff budgeted in the project are available. See "Certification" on page 6.

**Project Focus and Design:** Refer to the "TYPICAL SEQUENCE OF SUBGRANT ACTIVITIES" section of these guidelines. This should help you to develop a work schedule that meets SHPO requirements. Income should not be generated by any activity or product proposed, until after the project is closed out. If project income is generated, it must offset an equal amount of federal funds awarded/ requested for reimbursement.

**Products** : This information assists the SHPO in evaluating the scope of the proposed project, its likelihood for completion within the expected time period, and the budget.

**Professional Project Staff:** The National Historic Preservation Act specifies in 36 Code of Regulations (CFR) 61 Appendix A the professional qualifications necessary for participants in HPF assisted projects. Because professional experience and education is subject to interpretation, the SHPO will participate in the selection of the principal investigators for all projects. No consultants or limited term employee can be preselected; rather they must be selected through an open competitive process. If not a current on-going "salaried" employee; then the SHPO will assist in the recruitment of project staff, and will approve the language in any requests for proposal or advertisements that may be placed by the subgrantee. Both the SHPO and the project director will participate in candidate interviews. No substitution of professional project personnel may be made during the course of the project unless approved in writing by the SHPO.

Intern or non-professional involvement will be permitted only under the supervision of a professionally qualified principal investigator. The SHPO will review each project for the appropriateness of intern or non-professional involvement. The SHPO does not participate in the selection of non-professional support staff, such as typists or field crew.
COMPLETION OF THE APPLICATION, continued

**Budget:** Budget amounts must be realistic and based upon fair and open competition among suppliers of professional services, materials, or equipment. The SHPO strongly recommends that applicants obtain estimates of major cost items to use as a basis for preparing proposed budgets and include the document as an attachment (applications with written estimates will score higher). If you are awarded a subgrant, the purchase of items in this budget must be based upon the federal procurement standards, which provide for maximum open and free competition, regardless of the dollar value.

Eligible Expenses, include:

1. **Salaries** for personnel directly involved in stated project activities. The maximum rate is $63.00 hourly or $504 daily. Applicant staff salary’s are considered "cash" for this grant. Professional services contracts: all subgrantees shall use an open competitive negotiation process for procurement of professionals who are qualified to perform the work. The earnings limit is the same as above, which equals $131,544 annually. It is national policy to award a fair share of contracts to small and minority business firms. Accordingly, affirmative steps must be taken to assure that small and minority businesses are utilized when possible as sources of supplies, equipment, and services. Subgrantees shall take similar appropriate action in support of women's business enterprises.

2. **Fringe benefits** for project "salaried" personnel are allowed; the SHPO, however, reserves the right to reduce or otherwise limit the amount.

3. **Supplies, Services and Equipment:**
   a. **Administrative costs,** including secretarial, accounting, communication costs (telephone, etc.), and other miscellaneous costs may be eligible under certain conditions. However, these expenses must be itemized and supported by auditable documentation. Administrative costs in excess of 10% of total direct labor costs will be reviewed closely prior to project selection and during project negotiations. The SHPO reserves the right to limit the amount of administrative costs allowed on any grant-assisted projects.

   b. **Capital equipment,** we define as “per item cost is $300 or more.” If the SHPO does allow the purchase, at the conclusion of the project the equipment may become the property of the SHPO or the National Park Service.

   c. **Equipment rental.** The total cannot exceed the cost to purchase the item.

   d. **Maps, film and photo processing.** Items needed for project products.

   e. **Office supplies** needed for project administration and products.

Eligible Expenses, include: continued
f. **Curating costs** for archaeological artifacts for the period of the project only.

g. **Photo-copying and printing**, costs for completed inventory cards/forms, research materials, and final reports. The SHPO will provide, at no cost, blank National Register nomination forms and extra administrative forms (time sheets, donated supplies valuation, progress reporting, reimbursement request forms, etc.), as necessary.

h. **Travel expenses**, if necessary for completion of field work; including room (up to $62), meals (up to $34 per day), and mileage (up to **$0.325 per mile**). If a new rate is approved by the federal or Wis. State government, the lower of the two rates must be used after it becomes effective.

Ineligible Expenses are (because local matching share is no longer required): Indirect costs, Volunteer services, donated goods/equipment and facilities (building space).

**Applicant access to cash.** Furnish the name of the entity providing the funds, the amount, and the date the funds are available. This date is critical because there may be bills to be paid by the Subgrantee soon after the Project's Work Program begins. The **project expenses must be paid by the applicant/subgrantee.** A Reimbursement Request can be submitted to the SHPO, only after a product is completed. It may take the SHPO up to 60 days to convert the Reimbursement Request into a check.

**Certification.** The authorized agent (Financial Officer) for the agency or organization making the application must sign the Application. This person has the responsibility for ensuring that proper procedures are followed for purchasing as well as accounting. This person will also ensure identification of payments to this subgrant (account or code) versus unrelated costs. This person will be sent the signed State Purchase Order and a copy of the fully executed MOA.

**Grant Experience.** For historic architecture projects and CLGs that have not received a HPF subgrant in the last 5 years, provide information on any recent grant administered by the Applicant’s Project Director. If no grant administration experience, provide names of contracts or other instances where competitive procurement and budget supervision were crucial.
The following rules are basic to this federal grant program:

1. **No work may be funded retroactively.** All work must be approved in advance through the grant selection and MOA negotiation process. Subgrantees will be notified by the SHPO when work can begin.

2. **All work must be an eligible program activity.** Only certain types of work are allowable under this program, see section "ELIGIBLE ACTIVITIES BY PROJECT TYPE." No work other than that specified in the work program can contribute to the projects' completion.

3. **The project must adhere to uniform administrative requirements.** All federal programs must follow the same general set of administrative rules. They have been designed to ensure fair competition for federally assisted grant contracts, proper accounting and management practices, and conformance with government-wide regulations. These documents are available on the NPS website at [www.whitehouse.gov/OMB/grants/index.html](http://www.whitehouse.gov/OMB/grants/index.html) or request from SHPO.

All subgrants must be administered in accordance with all applicable regulations and procedures governing federal grants including Office of Management and Budget (OMB) Circulars, available on the NPS Web site [www.whitehouse.gov/OMB/grants/index.html](http://www.whitehouse.gov/OMB/grants/index.html):

- A-21 Cost Principles for Educational Institutions (10/27/98),


continued.
4. **All expenses must be auditable.** An expense is any cost relating to the assisted project. Each year this program is audited to determine if:
   a. all expenses have been properly documented, and
   b. All federal regulations have been followed with respect to the expenditure.

5. **Curation** of archaeological materials, unless noted in the Memorandum of Agreement, the applicant agrees to curate and store in perpetuity all materials found and/or generated by the project. The federal guidelines are entitled "Curation of Federally-Owned and Administered Archaeological Collections" (36 CFR PART 79).

6. **Proof of compliance with federal regulations or requirements.** Applicants as well as contractors/consultants must comply with all applicable federal rules (including but are not limited to):
   a. Title VI of the Civil Rights Act of 1964 (equal opportunity requirements, and non-discrimination on the basis of age),
   b. procurement standards,
   c. Section 504 of the Rehabilitation Act of 1973,
   d. Anti-kickback Act of 1964,
   e. Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation,
   f. Certify that it nor its principals are presently or proposed for debarment, suspension or excluded from participation in any federal program,
   g. National Register Program Guidelines NPS-49, and
   h. Any special conditions agreed to at the time of the subgrant award.

7. **Project deadlines must be met.** Each subgrant is funded for a specific period of time after which the funds are recaptured by the NPS. For this reason, all subgrant work programs must show task occurring between the Project Period dates shown on the application. Extensions may be possible, but only in extreme circumstances and within the project period which for this award is September 15, 2016.

Requests for amendments must be made in writing to the SHPO at least 45 days prior to existing deadlines. Amendments can only be implemented after written approval by the SHPO. Failure to meet any deadline may result in termination or reduction of federal assistance.
WHO TO CONTACT

After reading the guidelines, if you have questions on completion of the application, contact the appropriate SHPO Program Manager:

Archaeology, John Broihahn (608/264-6496 or e-mail john.broihahn@wisconsinhistory.org)

All other projects Joe DeRose (608/264-6512 or e-mail joe.deros@wisconsinhistory.org)

All fiscal aspects, project budget, the material contained in this guide, or applicable federal regulations Joe DeRose (608/264-6512 or e-mail joe.deros@wisconsinhistory.org).

Direct correspondence to: State Historic Preservation Office
Fax: 608/264-6504
Wisconsin Historical Society (WHS)
816 State Street
Madison WI 53706-1842

World Wide Web Resources maintained by the:
Wisconsin government;
Wisconsin Historical Society, www.wisconsinhistory.org
University of Wisconsin, www.wisc.edu

federal government;
Whitehouse, links to many agency & legislative sites: www.whitehouse.gov

National Park Service (Links to the Past), www.nps.gov
Heritage Preservation Services, www.nps.gov/history/preservation.htm