

The Federal Preservation Officer: Responsibilities and Qualifications

A Report and Recommendations to the National Park Service

By a workshop of Federal Preservation Officers convened January 27-28, 1993

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Introduction

Section 110(c) of the National Historic Preservation Act of 1966, as amended (NHPA) requires that the head of each federal agency, unless exempted, designate "a qualified official to be known as the agency's 'preservation officer' who shall be responsible for coordinating that agency's activities under this Act." Section 110(c) goes on to say that such an official may be "considered qualified" if he or she "satisfactorily completes an appropriate training program established by the Secretary (of the Interior)."

Section 101(j) of NHPA, added to the Act by amendment in late 1992, directs the Secretary of the Interior (represented by the National Park Service) to "develop and implement a comprehensive preservation education and training program" in consultation with the Advisory Council on Historic Preservation, other federal agencies, and a wide range of involved non-federal parties. This program is to include "new standards and increased preservation training opportunities for federal workers involved in preservation-related functions."

Section 112 of NHPA, also added in 1992, provides for the Secretary of the Interior and the Office of Personnel Management to develop new performance and qualification standards for federal employees and contractors in historic preservation, in consultation with other agencies and concerned groups.

Collectively, these statutory mandates suggest, among other things, that the National Park Service (NPS), in consultation with the Advisory Council and others, should consider establishing an education and training program or programs under which federal Preservation Officers (FPOs) can be recognized as qualified pursuant to Section 110(c), and can retain and improve their qualifications¹.

To initiate an exploration of the potential for such a program or programs, NPS's Interagency Resources Division organized a workshop on January 27-28, 1993. Assisted by the National Preservation Institute, NPS requested the attendance of 21 FPOs, representing a wide range of agencies and missions, and many years of experience in their work, together with representatives of the Advisory Council and the State Historic Preservation Officers (SHPOs). The workshop was designed to develop:

- An accurate general depiction of FPO responsibilities and qualifications, based on the collective experience and expertise of the FPOs; and

- Recommendations to NPS regarding any actions the FPOs regard as desirable regarding FPO qualifications, education, and training.

This report summarizes the workshop results. A complete list of participants and minutes of the workshop are available as separate documents.

How FPOs are Designated

The workshop revealed a great diversity in the manner and level of formality with which FPOs are designated by federal agency heads. In some cases there has never actually been a formal designation; the FPO has simply "assumed the title" and never been challenged. In other cases the title has been assigned in a more or less serendipitous fashion: the agency finds that in order to answer a questionnaire or the question of a Congressional committee, or to address a preservation problem, an officially designated FPO is needed, and therefore designates one with little explicit consideration or justification. The Navy is an example of an agency that recently has designated its FPO in a highly formal fashion, after detailed study, with an official articulation of authorities and responsibilities.

It was the unanimous opinion of the workshop that it is desirable for agencies to designate their FPOs officially, based on full consideration of the FPO's roles and responsibilities, and to spell out this designation and its implications in appropriate official promulgations to the field. It was also agreed that FPO functions should be spelled out in official position descriptions and performance elements and standards.

What FPOs Do

The exact functions of FPOs vary from agency to agency. In GSA and NPS, for example, the FPOs regard it as an important part of their responsibilities to maintain inventories of their agencies' known historic properties. In FERC and the federal Highway Administration, which have no such inventories, this function is irrelevant, while in the Forest Service the inventory is so vast, and the agency so decentralized, that central inventory maintenance would make no sense. FERC is developing an inventory of historic properties affected by pipeline projects it licenses, and the Forest Service maintains inventories at the regional and forest level, but the FPO is not personally responsible for oversight of these inventories.

The workshop developed a list of FPO functions, but it should be recognized that not all FPOs perform all such functions. Besides the fact that some functions are more relevant to some agencies than to others, to a considerable extent all those listed are more accurately identified as functions that the workshop participants regard as desirable for an FPO to perform than as those that they regularly perform or are able to perform. Finally, the functions identified are really those that should be performed by a Federal Preservation Office, not necessarily by an individual FPO per se. The exact functions of the individual bearing the FPO title depend on the administrative model adopted by the agency (See "The FPO in the Administrative Structure of a Federal Agency," below).

With these caveats, the following were identified as major FPO functions:

Explaining historic preservation to others. Whether the FPO acts as advocate for preservation within the agency or merely explains legal requirements, most FPOs spend much time explaining to others in the agency what historic preservation is about—its principles, its processes, its legal requirements, the significance of historic properties and realistic means of preservation.

Point of contact. The FPO is, or should be, the agency's principal point of contact with such preservation entities as NPS, the

(FPO—continued on page 20)

Advisory Council, the National Conference of SHPOs, and public preservation groups.

Policy development, interpretation, and implementation. The FPO drafts and advocates promulgation and implementation of preservation policy within the agency, and helps other elements of the agency interpret and apply it.

Correspondence control. If the FPO does not actually sign or surmise all outgoing correspondence dealing with preservation, he or she should at least keep track of it and be able to influence its content.

Program and budget. The FPO oversees, directs, manages, or at least significantly influences the agency's historic preservation program, and has a substantial say in its articulation with the agency budget process. In agencies that manage historic properties (e.g. GSA), this function includes making judgements about the relative level and nature of a property's significance as a basis for allocating resources to its maintenance and rehabilitation.

Project review. The FPO plays a significant role in the agency's compliance with Section 106 of NHPA and related authorities (e.g. NEPA, AIRFA, NHPA Sections 110(b), 110(f), 111). The exact role varies from agency to agency, but the FPO is involved at least in explaining the review process to others (at other administrative levels or in other offices or bureaus), helping interpret it, helping move projects through it, and explaining the agency's mission and needs to such "regulatory" agencies as the Advisory Council and SHPO.

Implementing other legal requirements. Depending on the nature of the agency and its mission, the FPO may be involved in implementing the Archeological Resources Protection Act (ARPA), the Native American Graves Protection and Repatriation Act (NAGPRA), the Public Buildings Cooperative Use Act (PBCUA), the Americans with Disabilities Act (ADA), and other authorities bearing on historic preservation.

Evaluating and nominating properties; maintaining inventories. As noted above, this responsibility varies widely from agency to agency, but every FPO becomes involved at least in evaluating properties in the context of Section 106 review, and those that actually administer lands or buildings become involved in nominating them to the National Register of Historic Places and in maintaining inventories of significant properties. Most FPOs have signature authority on National Register nominations.

The FPO in the Administrative Structure of a Federal Agency

The workshop participants vigorously debated the level at which an FPO should be placed in the administrative structure of an agency in order to enable him or her to coordinate the agency's activities under NHPA. Although there is considerable variability across the federal establishment, three basic models were recognized.

Model 1: The FPO occupies a relatively high level in the agency structure, at which he or she has coordinative authorities that reach across the entire agency. Examples include the Deputy Assistant Secretary for Environment Safety and Occupational Health in the Air Force, and the Secretary of the Federal Energy Regulatory Commission (FERC).

The major advantage of Model 1 is that the FPO has clear authority to ensure that the various requirements of NHPA are effectively addressed throughout the agency, and that they are understood and attended to at the highest levels of agency decisionmaking. The major disadvantages are that the FPO inevitably has responsibilities other than those of FPO, and in most cases is unlikely to have deep expertise in historic preservation.

It follows that in order to carry out the FPO's coordinative functions, a Model 1 FPO needs ready access to professional

preservation staff, and at least sufficient general "sensitivity" training to understand the requirements imposed and opportunities presented by NHPA and other preservation authorities.

Model 2: The FPO is the head of a program office within the agency, to which historic preservation responsibilities are assigned. Examples include the General Services Administration (GSA), where the FPO is the director of the Arts and Historic Preservation office in the Public Buildings Service, and NPS, where the FPO is the chief of the History Division.

A Model 2 FPO is more likely than a Model 1 FPO to have great personal experience and expertise in historic preservation. As office head, the Model 2 FPO also is able to have direct influence on program and budget development. The extent to which a Model 2 FPO can influence agency-wide policy varies from agency to agency, and in some cases it may be difficult for a Model 2 FPO to know what other program offices are doing, even when these offices carry out programs that may have profound impacts on historic properties.

An agency that elects to follow Model 2 needs to establish clear lines of communication, coordination, and authority between the FPO and other program offices, as well as up and down various chains of command. Like the Model 1 FPO, the Model 2 FPO needs access to the expertise of specialist staff. Because Model 2 FPOs typically have functions other than those of FPO (though usually in more or less related fields), their training needs include introductory training when they assume their jobs, coupled with periodic updates on changing laws, policies, and programs.

Model 3: The FPO is a preservation expert within a program office to which preservation responsibilities are assigned. Examples include the Navy and the U.S.D.A. Forest Service.

The clear advantages of Model 3 are that the FPO is by definition an expert in some preservation-related field (typically the holder of an MA or PhD in an appropriate discipline, and with multi-year experience), and that he or she devotes full time or virtually full time to the FPO job. The disadvantages include a relatively low level of authority within the agency, difficult access to high levels of decisionmaking, and in some cases even to the budget process, and a high potential for being unaware of, and unable to influence, the actions of other program offices within the agency. A further disadvantage may be that an individual FPO's personal professional background may tend to bias the agency's approach to preservation; for example, an FPO trained as an archeologist may tend to give the entire agency program an archeological cast, to the disadvantage of non-archeological historic properties.

An agency that establishes a Model 3 FPO needs to pay very close attention to the administrative structure through which the FPO will exercise his or her coordinative responsibilities. The structure must be designed in a sense to amplify the authority of the FPO throughout the agency in order to ensure that the requirements of NHPA and related statutes are met by programs with which the FPO has no line relationship. To minimize the dangers of individual professional bias, the FPO—like the Models 1 and 2 FPOs—also needs structured access to an appropriate network of other preservation specialists. Training needs for the Model 3 FPO include introductory instruction in legal, procedural, and policy requirements when new in the job, periodic updates, and specialized training relevant to the historic resources and preservation issues with which the agency deals. This last kind of training is particularly relevant because the Model 3 FPO may be the only preservation professional in the agency, and because even in agencies with larger preservation staffs she or he is likely to be much more involved in "hands-on" preservation work than his or her Model 1 or Model 2 colleagues.

No agreement was reached as to whether any of the three models was superior to the other two. Two things did seem to be agreed upon:

The decisions an agency makes about the FPO's functions and qualifications effectively define the position of the FPO in

the administrative structure, and vice versa. If the FPO is to have agency-wide coordinative abilities and authorities, the agency virtually must either adopt Model 1 or something close to it. If the FPO is to have extensive professional qualifications in preservation, and perform "hands on" functions in the preservation program, the agency is almost automatically committed to something approximating Model 3.

The basic rule should be: place the FPO in a position where he or she can be effective. This means:

- Having access to money and FTE;
- Influencing policy;
- Having the authority to allocate resources (financial, personnel, historic);
- Having access to information (e.g. what different elements of the agency are doing or may do that can affect historic properties, negatively or positively).
- Being able to require that decisions are implemented; and
- Being accountable for decisions and agency actions.

Another administrative matter that was briefly discussed, but on which no particular conclusions were reached, was that of the relationship between the FPO and regional or field offices. It appeared to be generally agreed that the accountability of regional and field offices to an agency's national preservation program—and the accountability of the FPO for the actions of regional and field offices—is a major, rather knotty, issue. Many FPOs find themselves effectively in only advisory positions vis-a-vis regional and field offices, or unable to influence such offices except through complicated and pitfall-laden traverses of the agency's chains of command. In comments on the draft of this report, one FPO succinctly articulated this problem as follows:

"Many agencies are decentralized, with FPO type functions being delegated to regional/state offices or field offices. The FPO certainly plays a pivotal coordination role, but in many cases, a great deal of the day-to-day work is performed by other individuals only remotely tied to the headquarters/central office. This issue is important to remember.... Let's not focus all of our attention on the relatively small group of FPOs and forget the larger community of historic preservation professionals that perform much of the meaningful work."²

FPO Qualifications

The workshop participants discussed the qualifications that an FPO should possess, in other words, "what makes a good FPO?" It should be noted that this issue was put to the participants in the form of a question, in essence: "if you were recruiting a successor for yourself, what would you look for?" Since the participants were invariably FPOs in Model 2 or 3 agencies, or staff to Model 1 FPOs, the results cannot be taken to suggest the qualifications of a Model 1 FPO. Again, we are defining more the qualities of employees in a Federal Preservation Office than the qualities of an individual FPO.

Federal experience was widely perceived to be a prerequisite. Experience should be at a supervisory level. Multiple agency experience is desirable, and should include developing policy and procedures. Experience in contracting and consulting is viewed as desirable, as is experience in interdisciplinary work. Ideally, experience should include experience both within and outside preservation. Experience in preservation does not necessarily mean professional training in a particular preservation discipline. Although the FPO needs access to professional expertise, the actual FPO need not be a preservation professional.

Political awareness is necessary. The FPO must be able to balance preservation with other values intrinsic to or bearing on the agency's mission. He or she should be a good negotiator, and be flexible enough both to influence and to accommodate change. One participant stressed the need to be aggressive and to have a high pain threshold.

Organizational and management skills are important, particularly for those who actually manage programs. Creativity, problem-solving abilities, and strategic sense are important to all FPOs.

Knowledge of the law—not only its letter but its intent—is important, as is an understanding of the external systems with which the agency must interact, such as the systems overseen by SHPOs and the Advisory Council.

Knowledge of the agency's mission and operations, or a readiness to learn, is of vital importance to the effective FPO.

Technical expertise in relevant preservation disciplines is important, but need not necessarily reside in the FPO herself or himself. An FPO without such technical expertise needs ready access to staff or consultants who possess it, and needs to know when and how to avail himself or herself of it. The kind of technical expertise that is appropriate varies from agency to agency, mission to mission. For example, GSA needs more expertise in architecture and landscape architecture than in archeology or cultural anthropology. Typically, however, each FPO needs access to multiple kinds of professional expertise.

What Does NOT Work

The participants spent a little time identifying recurring problems with agency programs—in other words, what does not work. Major problems identified included:

Nobody at the center. Decisions about preservation-related issues are made without accessing relevant expertise. This may occur in a Model 1 agency when the FPO lacks effective access to, or does not avail himself or herself of such access to, knowledgeable advice, or in a Model 2 or 3 agency when the FPO is not consulted about agency decisions bearing on preservation. More rarely it may occur in a Model 2 or 3 agency whose FPO lacks relevant information or expertise.

Gridlock. Decisions are not made at all, or are unnecessarily delayed, because there is a vague, ill-defined, or simply inaccurate perception of what is required by the historic preservation laws. This typically occurs in an agency that has failed to spell out the authorities and relationships of its FPO, and/or failed to ensure that the FPO is appropriately qualified and trained. It also may occur in decentralized agencies where people performing FPO-like functions at the regional office or field office level are poorly trained or unable to access the FPO efficiently.

Too many layers. Decisions are encumbered by the need to clear them through multiple levels of bureaucracy. This is almost unavoidable in any line/staff or headquarters/regional office organization, and the problems it creates may be balanced by its advantages in many cases, but any agency that finds itself spending a great deal of time on internal coordination needs to consider whether its organizational structure is effective in getting its job done.

The 1992 Amendments

The workshop gave special attention to the implications of the 1992 NHPA amendments with respect to FPOs.

§§ 101(j) and 112 (Education, training, standards)

These amendments underscore NPS responsibilities and authorities with respect to FPO training, though they go far beyond this to address a wide range of other education and training issues.

The amendments stress consultation with others, and the workshop participants wish to underscore this stress. Many excellent education and training programs pertinent to FPO functions already exist, and many standards are already in place, either government-wide or in particular agencies, states, and regions. All these should be carefully considered in implementing the amendments. There is no reason to reinvent wheels. This is not to say that further training is not necessary;

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currently available training by no means covers the ground. Any training that is developed, however, should be coordinated with, and complement, not duplicate, what is already available³.

§ 110(a)(2) (Federal agency programs)

The rewriting of § 110(a)(2) will require agencies to pay more attention to program development, in consultation with NPS, the Advisory Council, and others. This is an important opportunity for program improvement across the federal establishment.

§ 110(a)(2) does not necessarily in and of itself describe a complete program: other requirements of NHPA (e.g. §§ 110(a)(1), 110(b), 110(d), 110(g), 110(k), 111, 112) and other authorities (e.g. ARPA, NAGPRA, PBCUA, ADA) must be integrated into § 110(a)(2) programs.

The sequence of activities described in preamble of § 110(a)(2) are not to be taken as implying priority order.

§ 110(k) (Anticipatory demolition)

This provision has major implications for regulatory and assistance agencies, and requires further study.

It also has implications for land managing agencies that issue rights-of-way across federal land, for agencies that assist state and other programs of local land-use regulation, and probably for a variety of other agencies. The issues involved for such agencies are complex, and must not be ignored.

Conclusions and Recommendations

Although many issues were left unresolved, and in fact are probably not resolvable by a group like the one assembled, certain definite conclusions were reached, which in turn form the basis for recommendations to NPS.

NPS should offer assistance in agency program development.

There was general agreement that NPS assistance would be useful in the further development, formalization, and improvement of federal agency preservation programs, including but not limited to the establishment and maintenance of qualified FPOs and other staff. The participants recognized that the 1992 NHPA amendments increase and clarify NPS authority to provide such assistance. Amended § 110(a)(2) of NHPA, providing for agency program development in consultation with NPS, the Advisory Council, and others, could be the primary statutory basis for a collegial enterprise in agency program improvement across the federal government.

The workshop discussed the pros and cons of NPS-issued "standards and guidelines" for agency preservation programs. Considerable concern was expressed about the promulgation of "standards"; many FPOs do not feel that NPS understands how agencies must balance preservation against mission requirements well enough to promulgate standards that would be realistic. Most of the participants felt more positively about non-binding "guidelines" that FPOs could use selectively in encouraging improvements in their agency programs. At the same time, however, some felt that binding standards are necessary in order to help them prevail upon their agencies to pay attention⁴.

The needs of Federal Preservation Offices vary widely, and must be worked out on an agency-specific basis. The Advisory Council can be helpful in agency program development under Section 202(a)(6) of NHPA, but NPS can and should use its various authorities under NHPA in a compatible manner.

The sense of the group was that NPS should work toward developing guidelines and/or standards for agency historic preservation programs, as long as it does so in a collegial manner, in full, open, consultation with the FPOs, the Advisory Council, the SHPOs, Indian tribes and Native Hawaiian organizations, Certified Local Governments, and other interested parties. A number of participants expressed appreciation for the collegial nature of the meeting in which they were taking part,

and the hope that this sort of spirit would be retained in any ongoing development of guidelines and training.

Any guidelines, standards, or other forms of assistance should address not only the qualifications and functions of the FPO as an individual, but those of the Federal Preservation Office, and its relations with other elements of the agency, including regional/state offices and field offices.

Agencies must be helped to recognize that no individual FPO can effectively handle all preservation problems and issues. Even in the smallest of agencies, or the agency with the least potential involvement with historic preservation issues, there will be the need at least to have access to a wide range of preservation specialists to handle circumstances where preservation issues do arise. Often, specialist expertise is particularly needed in regional/state offices and field offices, and the kinds of such expertise needed may vary from region to region.

While § 110(a)(2) of NHPA is the primary obvious authority for improved federal program development, it must be clearly understood that—as noted at u.3.2 above—§ 110(a)(2) provides only an organizational framework upon which an effective federal preservation program can be hung. The requirements of, and opportunities afforded by, such authorities as § 110(a)(1), § 110(b), § 110(g), § 110(k), § 111, § 112, ARPA, NAGPRA, NEPA, ADA, and PBCUA must be fully recognized and integrated into any federal preservation program to which they are pertinent, and addressed in any assistance provided by NPS.

NPS should further explore training program development.

In consultation with the Advisory Council, FPOs, SHPOs, and others, NPS should explore development of a training program to qualify FPOs, the staff of FPO programs, and others who work in agencies with FPOs. Like guidelines or standards, any such training program(s) should be developed in a collegial manner, and be designed to address the real requirements of the FPO's work as understood by the FPOs. This is not to say that the perceptions of agencies like NPS and the Advisory Council, as well as SHPOs, Indian tribes, local governments, and others are not important, or that preservation issues and developments that FPOs do not happen to give priority at a given time should not be addressed in training. It is only to say that the FPOs must be fully involved in the development of training, and that priority should be given to the real needs of FPOs, rather than to the interests and competencies of NPS or others who provide training—except where the two coincide.

Any such program should address not simply the qualifications of FPOs as individuals, but the qualifications of Federal Preservation Offices as wholes. It should focus on the professional and experiential qualities of individuals, but also on the organizational effectiveness of the structures within which they work. It should provide training for a variety of personnel who perform a variety of functions. It should address the needs not only of headquarters/central office staff, but of regional/state offices and field offices.

Any such program should relate positively to existing programs, including those of the Advisory Council, various SHPOs, agencies, and various academic institutions, rather than competing with them.

Elements of any training program that should be considered include:

- Establishment of training standards for different levels within an FPO organization, regardless of exactly where the title "FPO" is lodged. The head of an agency, for example, whether or not he or she bears the title "FPO," needs at least certain kinds of sensitivity training in historic preservation, while a technical specialist, again whether or not he or she bears the FPO title, requires other kinds of training.
- Multi-agency seminars and briefings tailored to agency mission. For example, assistance agencies have very different missions and mission implications for historic preservation than do land management agencies; particularly for

high-level officials, it is necessary to tailor training and education to agency responsibilities, rather than to assume that what applies to one FPO applies to all.

- Integration with, and perhaps accreditation of, existing education and training programs operated by other agencies and institutions, such as those of the Advisory Council and the Corps of Engineers.
- Annual, biennial, or quarterly update seminars for FPOs and key FPO staff.
- Establishment of a system of "continuing preservation education credits," similar to the continuing legal education credits required by the American Bar Association, that FPOs or key staff would be required to take in order to retain their qualifications.⁵
- Training targeted explicitly at regional/state office and field office staff, and at relationships between the FPO and such staff.⁶

First steps.

As an early step in carrying out the above recommendations, NPS should advise the heads of federal agencies that it is undertaking such an initiative, and request that each provide NPS with the following information to serve as a basis for further study:

The name, title, and position description of the agency's FPO; and

Copies of any and all documents describing the FPO's functions to the field, including any strategic plans, operating procedures, and internal delegations in which FPO functions are articulated.

The Federal Preservation Forum (FPF) should also be involved as a source of information and expertise in obtaining and reviewing information on federal programs.

Unresolved Questions

A number of questions were raised during the workshop that were not resolved, and that should be considered during future discussions. These include the following:

- As a part of standards or guidelines for Section 110(a)(2) implementation, requiring or encouraging each agency to develop a "plan." Such a plan would constitute a formally articulated historic preservation program, which should address not only the requirements of § 110(a)(2) but other requirements of NHPA and related authorities. Although all seemed to agree that an organized response by each agency to the requirements of Section 110(a)(2) and related authorities was appropriate and needed, many were dubious about the notion of formal "plans." There was some feeling that the term "plan" carries unnecessary and confusing baggage.
- Maintaining an ongoing interaction group of FPOs that can share information, promote standards, and relate positively to NPS, Advisory Council, and other initiatives to implement the 1992 amendments. There is a clear desire to maintain a collegial relationship between the FPOs and NPS, the Advisory Council, and the SHPOs (among others), but no clear consensus on whether a definite group should be organized or recognized to maintain this relationship from the FPO side. It was not clear to what extent participants felt the FPF could perform this function.
- Environmental coordinators. Many agency programs use historic preservation or environmental coordinators at the regional and field levels. There seemed to be agreement that training specific to such coordinators might be appropriate, and that agency programs should address specifically how such coordinators are used, but there was insufficient time to explore their functions in detail.
- Environmental programs. Some agencies integrate their environmental protection and historic preservation programs. Time was not available to discuss the pros and cons

of such integration, which would be a fruitful topic for further exploration.

- Grade levels. At least some participants stated that they believe FPOs (at least in Model 3 agencies) are undergraded, resulting in reduced respect for FPOs within the agencies and a reduced ability to acquire and retain qualified FPOs. This question was not explored at all during the workshop.

¹ The NPS FPO, in comments on the draft of this report, asserted that this statement "seems potentially misleading," noting that "not until much later does the document affirm that existing training should not be duplicated" (Ed Bearss, NPS FPO 2/17/93). This statement was not intended to suggest that NPS should develop duplicative training; it was intended only to summarize the apparent direction of Congress. It may be worth noting at the outset, however, that the group was emphatic about the need for any NPS training efforts not to be duplicative, and to be coordinated with the training activities of other agencies. TFK

² Kevin Kilcullen, Fish and Wildlife Service. Facilitator's note: It also must not be forgotten that many of the people performing "FPO-type functions" in regional, state, and field offices are not preservation professionals. On many military installations, for example, FPO-type functions are often among "other duties as assigned" performed by engineers, wildlife biologists, and others. TFK

³ Facilitator's note: The NPS FPO, in comments on the draft of this report, drew special attention to the "roles the Advisory Council may play in this area. It seems that the Council is poised on the verge of some very constructive developments right now that could greatly facilitate meeting FPO needs for training" (Ed Bearss, NPS FPO, 2/17/93).

⁴ Facilitator's note: It might well be that a very short, general set of recommended standards would be in order, clearly grounded in statute and accompanied by flexible guidelines. The standard that "the FPO must be able to coordinate the agency's activities under the Act," for example, is directly derived from § 110(c) itself. It could be met through a variety of coordinative schemes, about which guidelines could be written. In comments on the draft of this report, the NPS FPO suggested that "some form of agency-specific advisory management assessment, based upon existing documents like the Secretary's Standards and Section 110 Guidelines, (might) be at least as helpful as another set of potentially overlapping 'recommended standards'" (Ed Bearss, NPS FPO, 2/17/93). This suggestion may well be worth further exploration, taking into account that many agencies already have systems for periodic management assessments (e.g., the Environmental Compliance Assessment System [ECAS] in the Army), and the experience of NPS and the SHPOs in the management assessments now carried out by NPS under Chapter 30 of NPS-49. TFK

⁵ The NPS FPO, in his comments on the draft of this report, suggested that "continuing preservation credits" and accreditation seemed "potentially duplicative, intrusive, and cumbersome." He also suggested that this paragraph in particular was a "possible problem area" in terms of the "precise limits of the NPS legal mandate" (Ed Bearss, NPS FPO, 2/17/93). These concerns obviously must be taken into account in further exploration of the possibilities raised by the group. TFK

⁶ Facilitator's note: This was not explicitly suggested during the meeting, though it was implied. It was explicitly recommended by the Fish and Wildlife Service FPO in his comments on the draft report, and seems to be both an important point and one that is consistent with the general concerns of the group. TFK