Park Cultural Resource Program Comprehensive Assessment Update

NATIONAL ACADEMY OF
PUBLIC ADMINISTRATION®

December 2022

This page is intentionally left blank.

December 2022

A Report by a Panel of the

NATIONAL ACADEMY OF PUBLIC ADMINISTRATION

for the National Park Service

Park Cultural Resource Program
Comprehensive Assessment Update

PANEL OF ACADEMY FELLOWS

Sallyanne Harper, *Chair*

Stephen Ayers

Scott Cameron

Dr. Beth Gazley

Dr. Janet Weiss

The views expressed in this report are those of the Panel. They do not necessarily reflect the views of the Academy as an institution.

About the Academy

The National Academy of Public Administration is an independent, nonprofit, and non-partisan organization established in 1967 and chartered by Congress in 1984. It provides expert advice to government leaders in building more effective, efficient, accountable, and transparent organizations. To carry out this mission, the Academy draws on the knowledge and experience of its nearly f1,000 Fellows—including former cabinet officers, Members of Congress, governors, mayors, and state legislators, as well as prominent scholars, career public administrators, and nonprofit and business executives. The Academy helps public institutions address their most critical governance and management challenges through in-depth studies and analyses, advisory services and technical assistance, congressional testimony, forums and conferences, and online stakeholder engagement. Learn more about the Academy and its work at www.NAPAwash.org.

This page is intentionally left blank.

Foreword

The National Park Service (NPS), founded in 1916, cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world. This report focuses on a group of park-based cultural resource programs within the Cultural Resources, Partnerships, and Science Directorate (one of the NPS' functional directorates). This group of programs is located within the Park Programs and National Heritage Areas division of the Directorate and is referred to in this report as the Park Cultural Resource Program (PCRP).

The purpose of this report is to assess the PCRP's current state and identify its desired one. The report also presents findings and recommendations that support PCRP's efforts to enhance its efficiency and effectiveness in the future. This study builds on a previous report for the PCRP by the National Academy of Public Administration (the Academy) published in October 2008, "Saving Our History: A Review of National Park Cultural Resource Programs," and provides additional guidance to improve stewardship of park cultural resources.

As a congressionally chartered, independent, non-partisan, and non-profit organization with over 1,000 distinguished Fellows, the Academy has a unique ability to bring nationally recognized public administration experts together to help government agencies address challenges. This assessment by a five-member Panel of Academy Fellows provides recommendations that can further advance the vital mission of the PCRP. I am deeply appreciative of the work of the Panel and commend the Study Team that contributed valuable insights and expertise throughout the project. I am also grateful for the constructive engagement of many NPS employees and external stakeholders who provided important observations and context to inform this work.

This report illustrates important facets of one of the Academy's Grand Challenges in Public Administration: Steward National Resources and Address Climate Change. I trust that it will be used to advance the goals of the PCRP and to address many complex tasks facing its dedicated staff entrusted with this vital program. The duty and privilege to preserve such a broad array of cultural resources for future generations demand both adequate financial and personnel resources as well as efficient and focused efforts by the PCRP to achieve this far-reaching goal.

Teresa W. Gerton
President and Chief Executive Officer
National Academy of Public Administration

This page is intentionally left blank.

Table of Contents

List of Figures

i

Acronyms and Abbreviations

Acronym or Abbreviation	Definition
Academy	National Academy of Public Administration
ACHP	Advisory Council on Historic Preservation
CR Challenge	Cultural Resources Challenge
CRAG	Cultural Resources Advisory Group
CRP Funds	Cultural Resource Project Funds
CRPS	Cultural Resources, Partnerships, and Science Directorate
CRSA	Cultural Resource Stewardship Assessment
DOI	Department of the Interior
FTE	Full Time Equivalent
FY	Fiscal Year
GAOA	Great American Outdoors Act
HPPD	Historic Property Project Documentation
IEV	Interpretation, Education, and Volunteers Directorate
NHPA	National Historic Preservation Act
NPS/Park Service	National Park Service
NRSS	Natural Resources Stewardship and Science Directorate
OMB	Office of Management and Budget
ONPS	Operations of the National Park System

OPM	Office of Personnel Management
PA	Programmatic Agreement
PCRP	Park Cultural Resource Program
PNHA	Park and National Heritage Areas
PPFL	Park Planning, Facilities, and Lands Directorate
SHPO	State Historic Preservation Office
THPO	Tribal Historic Preservation Office
WASO	Washington DC Area Support Office

Executive Summary

Within the National Park Service (NPS), the Cultural Resources Partnerships, and Science Directorate (CRPS) provides leadership for the protection and interpretation of the nation's heritage, guides an historic preservation program that embraces national parks and heritage resources, engages all American people with the places and stories that make up their national identity, and serves as a model for the stewardship of cultural resources throughout the world.[1] Among several important operating units in the CRPS, the Park Cultural Resource Program (PCRP) is responsible for diverse disciplines including historical structures, ethnography, museum management, park history, landscapes, and archaeology. This report offers a comprehensive, independent, balanced, and expert assessment of the PCRP's functions and capabilities, challenges, and options for addressing those challenges. It provides recommendations based on clear principles of how the PCRP might operate more efficiently.

The genesis of this work is a 2008 report providing a similar assessment that was completed by a Panel of Fellows of the National Academy of Public Administration (the Academy). This report is not intended to track and evaluate how the PCRP addressed each of the 2008 report's 16 recommendations; rather, this report scrutinizes how the opportunities and challenges facing the PCRP appear at the present time, identifies important actions that can enhance its mission performance and provides insights into how best to integrate the report recommendations to facilitate success.

Since the issuance of the 2008 Academy report the state of PCRP's funding and staffing levels have declined. This challenge cannot be overstated in an agency with a primary mission to preserve unimpaired natural and cultural resources. Thus, the backdrop to this assessment and recommendations is inextricably intertwined with a decade-long dearth of resources allocated to the PCRP. The amount of funding has been flat or dropping over the past ten years. Not surprisingly, the number of professional cultural resource employees in the headquarters, regions, and parks across the NPS is also dropping. In fact, funding in real dollars and staffing levels have dropped by 14.3% and 17.5% respectively since 2011. Significant portions of PCRP work have been assigned as collateral duty responsibilities to park-based colleagues who may lack requisite expertise. During the same period, the PCRP workload has increased, further exacerbating the challenges that must be addressed. While resource allocation challenges in the NPS are not unique to the PCRP, they narrow the scope of actionable options available to complete its many tasks within a growing nationwide NPS system richly endowed with valuable cultural resources. Without increases to funding, the PCRP faces significant challenges to effectively perform the professional responsibilities to manage cultural resources appropriately and effectively.

It is beyond the scope of this report to recommend changes in funding for PCRP. Within this austere context, this report focuses on three major operational themes that offer opportunities for the PCRP to perform more stable professional services: processes, resources, and

---

[1] "Cultural Resources, Partnerships, and Science Directorate," *The National Park Service*, Accessed June 21, 2022. https://www.nps.gov/orgs/1345/index.htm

1

communications (the nine report recommendations are listed at the end of the Executive Summary).

Focus on processes calls for PCRP leaders to have a more disciplined selectivity as to which tasks should be prioritized and those which need to be de-emphasized or jettisoned altogether. This report calls for the PCRP to winnow its current list of tasks, identify those that merit primary investment of staff resources, and then pivot staff attention to do those more essential tasks better. This report urges the Directorate to update overarching cultural resources policy guidance and establish targeted priorities to help focus stewardship duties. Targeted priorities will facilitate consistency across all parks and regions as to which tasks must take precedence over others. Establishing consistency and scalability within processes is another initiative critical to advancing process enhancements. This may include training and accountability to enhance the standardization of cultural resource management across the NPS. Three recommendations are connected to processes.

Focus on resources calls for PCRP leaders to utilize standardized priorities to shape its budget requests and help provide greater line-of-sight into how staffing alignment may need adjustments. Furthermore, this theme emphasizes how identifying performance metrics, collecting data, evaluating the data, and shifting scarce resources to maximize mission performance and achieve strategic objectives can enhance how the PCRP leads parks and regions toward greater operational efficiencies. Four recommendations are connected to resources.

The final theme, communication, underscores how improved internal communication (within the PCRP and its Directorate) and external communication (across the NPS, the Interior Department's Office of the Secretary, OMB, the Congress and with the public) can enhance opportunities to advance collaboration, customer service, and even serve as a force multiplier. Further, communication of PCRP achievements and challenges supported by performance data should advance its efforts to broaden NPS and other awareness and appreciation for the essential work this program stewards. One recommendation is connected to communication.

The nine report recommendations are crafted to be actionable with minimal disruptions to PCRP operations. They are further delineated into three implementation timeframes, each supporting ongoing change management efforts. The decision to slot specific recommendations into a particular phase underscores an optimal sequencing of actions that builds on one another and are best implemented sequentially in smaller pieces rather than attempting to implement them all at the same time. The PCRP leadership may have a better result by spreading out the recommendations over time, rather than attempting to implement them all at once.

Finally, the recommendations are directed to the PCRP and its Directorate rather than directed to another segment of the NPS or other parties. As noted, before, the longstanding shortage of funding and staffing to carry out the PCRP mission is a fundamental challenge. The panel recognizes that increased funding (and staffing) would make it much more likely that PCRP could achieve major strides in performance. The report suggests ways to improve performance without new resources, and how to position PCRP to make a stronger case for new resources in the future.

To conclude, the greatest asset of the PCRP is its personnel located in headquarters, regions, and parks. With a highly professional and dedicated staff, albeit one shrinking in size, the report

conveys a positive view about the PCRP's opportunities to advance its important work connected with describing, cataloging, and protecting the myriad of items in its care. Further success going forward will require changes in processes, more focused use and better tracking of how resources are used, and enhanced communication and customer service support. The nation, the NPS, and most importantly, PCRP staff members will reap rewards from these changes.

Each recommendation is listed below and sequenced in three implementation phases. There is an estimated timeframe for each phase which is devised based on high-level assumptions that sufficient staffing and funding resources are not likely to be available in the near term. As such, the PCRP should add accountability and prioritization to achieve its challenging.

Implementation time during each phase may vary due to both internal and exogenous reasons. Phases are likely to overlap as work proceeds. The number attached to each recommendation remains consistent with where it appears in the report text rather than appearing sequentially in this list.

Phase 1: Setting the Foundation – *(Estimated time of 12 months)*

- **Recommendation 3.1:** Update Director's Order 28 and its supporting handbook to create efficiencies in cultural resources management. Incorporate the progress the PCRP has already made in creating operational and management efficiencies such as the HPPD and CORE baseline documentation guidance.
- **Recommendation 3.2:** Utilizing the updated Director's Order 28, develop short-term priorities for cultural resources management that fit within NPS Director's goals. Periodically revisit and refocus these priorities to match current programmatic needs. This strategic document should build off of larger NPS goals such as other current NPS Director's goals and be used to frame how cultural resource management is addressing Servicewide priorities.
- **Recommendation 4.1:** Apply strategic cultural resources goals and objectives into:
  - o The PCRP budget formulation process; and
  - o Cultural Resource Project Funds allocation criteria.
- **Recommendation 4.3:** Conduct a comprehensive workforce analysis on cultural resources needs to understand where critical staff member capacity shortfalls exist.

Phase 2: Launching for Growth – *(Estimated time during the following 12 months)*

- **Recommendation 3.3:** Refocus the structure of the PCRP around process-driven resource management that guides the standardization of cultural resources management across the NPS. Unite the different parks, regions, and cultural resource programs around the established cultural resources management priorities.
  - o Refocus the Cultural Resources Advisory Group (CRAG) to focus on the cultural resources management priorities. Ensure that CRAG members have or develop the necessary change management expertise to support this refocused initiative.
  - o Use the CRAG as a reviewing body that provides guidance on how to use an updated Directors Order 28.
  - o Use the CRAG to assist the CRPS AD in establishing short-term priorities for cultural resource management that fit within the NPS Director's goals.

3

- o   Explore opportunities to establish cultural resource centers of excellence. Begin by identifying areas where cultural resource management support is most needed.
- **Recommendation 4.2:** Track, monitor, and report how funds are utilized. Actions include:
  - o   Track how Cultural Resources Project Funds are allocated for each project and create a capability to readily access these documents;
  - o   Analyze how Cultural Resources Project Funds are being used and prioritize areas of critical importance;
  - o   Develop uniform metrics to facilitate evaluation of how effective resource investments are; and
  - o   Utilize established metrics in preparing budget requests to highlight programmatic impacts attributed to reduced or unchanged funding to all appropriate stakeholders and illustrate what the PCRP can achieve with increased funding.

Phase 3: Expanding the Reach – *(Estimated time beyond 24 months)*

- **Recommendation 3.4:** Making use of an updated Director's Order 28, create flexible and scalable cultural resources management processes and align them with Servicewide priorities for cultural resources management. Actions include:
  - o   Re-evaluate current compliance processes to identify opportunities to create efficiencies and reduce paperwork burdens. Start with the compliance and baseline documentation processes utilizing the Historic Property Project Documentation (HPPD) as a pilot
- **Recommendation 4.4:** Continue to emphasize and explore how collaboration with other NPS Directorates can serve as a force multiplier and enhance timely project completion rates.

Change Management Support – *(Ongoing)*:

Recommendation 5.1: Create a customer service-based communications strategy for engaging with internal and external stakeholders around targeted cultural resources management priorities. Actions include:

- Facilitate timely and regular communication about goals and priorities among WASO, regions, and parks
- Facilitate timely and regular communication about goals and priorities with other NPS Directorates;
- Establish frequent internal communication forums to promote employee engagement through improved transparency, visibility, and employee accessibility to leadership; and
- Regularly look for feedback on how to improve engagement and communications.

4

Section 1:   Project Background

The National Park Service (NPS or Park Service) was founded in 1916 "to preserve unimpaired the natural and cultural resources of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world."[2] A bureau within the Department of the Interior (DOI), the Park Service, has approximately 20,000 employees. It also benefits from over 279,000 individuals serving in various volunteer capacities. Before the impact of the COVID-19 pandemic started in 2020, over 318 million people visited 423 NPS parks[3] in a typical year.

Three Deputy Directors work with the Director to lead the NPS. The Deputy Director of Operations oversees the day-to-day functions of the Park Service, including overseeing six Directorates with functional responsibilities and 12 geographic regions. This report focuses on a set of programs located in one of the functional Directorates: the Cultural Resources, Partnerships, and Science Directorate (CRPS). Led by an Associate Director, this Directorate "provides leadership for the protection and interpretation of the nation's heritage, guides a national historic preservation program that embraces national parks and heritage resources, engages all American peoples with the places and stories that make up their national identity, and serves as a model for the stewardship of cultural resources throughout the world."[4] Among its staff, the CRPS employs archaeologists, architects, curators, historians, anthropologists, ethnographers, landscape architects, and other cultural resource professionals dedicated to preserving, protecting, and sharing the nation's history.

The Directorate has a single Associate Director (AD) with broad statutory responsibilities. Those who serve in the Directorate have to support that vast and complex portfolio with limited staff and resources. The CRPS has three main divisions: (1) Preservation Assistance Programs; (2) Parks Program and National Heritage Areas (PPNHA); and (3) Science, Technology, and Training. This report focuses on a group of park-based programs located in the second division listed above: PPNHA. While there is no formal title attached to this collection of programs, this division is referred to in this report as the Park Cultural Resource Program (PCRP). More background information on this division of the CRPS is provided in Section 2.

1.1   Scope of Work

The CRPS contracted the National Academy of Public Administration (hereafter the Academy) to develop findings and recommendations to support the PCRP's efficiency and effectiveness in the future. The work calls for a report that identifies options for change that will augment the PCRP's

---

[2] "About Us," *The National Park Service*, Accessed June 21, 2022.
https://www.nps.gov/aboutus/index.htm
[3] The NPS manages 423 individual units. While there are at least 19 naming designations, these units are commonly referred to by the NPS as "parks." In keeping with NPS practice, this report refers to all NPS units as "parks".
[4] "Cultural Resources, Partnerships, and Science Directorate," *The National Park Service*, Accessed June 21, 2022. https://www.nps.gov/orgs/1345/index.htm

ability to achieve its mission, including introducing greater specificity in setting goals and identifying measures for assessing progress and justifying and allocating resources.

This report is an offshoot of a previous Academy study concluded for the PCRP in 2008 entitled "Saving Our History: A Review of National Park Cultural Resource Programs."5 A report of a three-member Panel of Academy Fellows contained findings and recommendations to improve NPS stewardship of park cultural resources. It was divided into five cross-cutting sections as follows:

- Performance-based management
- Park superintendent accountability
- Increased flexibility
- National leadership
- Funding and staffing

The 2008 Academy report contained 18 recommendations (see Appendix A for a list of 2008 report recommendations) organized under the five themes noted above. Rather than evaluating and documenting specific progress of NPS actions on each of the 2008 report's recommendations, this report aims to update that review and offer ideas on how PCRP's operations might be enhanced within the Directorate. More details connected with the 2008 Academy report appear in the next section.

1.2 Methodology

The Study Team worked under the leadership of a five-member Panel of Academy Fellows (short biographical information on the Panel and Study Team can be found in Appendix B). The 11-month project commenced on August 31, 2021 and concluded with this report in December 2022.

Documentary research included NPS documents, policies, and other written sources. The report is also informed by research in organizational and project management, strategic prioritization, organizational transformation, and augmenting process and resource efficiencies in a resource-constrained environment.

Interviews enhance documentary research sources. The Study Team met with more than 100 individuals from both inside of NPS and a wide variety of external stakeholders with connections to the NPS (a complete list of interviewees is found in Appendix C). This list includes interviews with NPS staff in the Washington DC Area Support Office (WASO), regional staff, park Superintendents, and other CPRSD staff in the field. The list of interviewees includes other state and domestic federal agencies that work with cultural resources.

Research and this report's structure are guided by three main themes: processes and structure, resources, and messaging and communications.

---

5 Frank Hodsoll, James Kunde, and Denis P Galvin, *SAVING OUR HISTORY: A Review of National Park Cultural Resource Programs*. National Academy of Public Administration, 2008. https://napawash.org/academy-studies/saving-our-history-a-review-of-national-park-cultural-resource-programs

1.3   Report Organization

Besides this section, the report has the following sections.

Section 2 provides background on the PCRP, including how it is organized and fits into the NPS. This provides important context for findings and recommendations in future sections.

Section 3 focuses on processes and structures, offering findings and recommendations that can create more efficient and effective processes.

Section 4 focuses on resources, offering findings and recommendations to enable more efficient resource management.

Section 5 focuses on communication and customer service, offering findings and recommendations to strengthen strategic communication and customer support.

Section 6 summarizes best practices to lead organizational transformation, amalgamates recommendations from the previous three sections into a cohesive and integrated package, and adds a timing dimension to help NPS plan its implementation.

Section 7 is a conclusion that summarizes the report and provides a final charge to act.

Section 2:   Background on the Park Cultural Resource Program

This section provides context and important background information on the Park Cultural Resource Program (PCRP). The PCRP is a multidisciplinary office that is responsible for coordinating the management of cultural resources within the purview of the NPS at the national level. The PRCP develops, distributes, and coordinates policies and tools for parks to steward cultural resources so that they remain unimpaired for future generations, directly contributing to fulfilling the NPS mission. This section begins with a brief overview of the NPS's cultural resource stewardship responsibilities and the organizational structure in which the PCRP sits. It also describes prior efforts to address issues related to cultural resource stewardship. The section concludes with a high-level summary of several cross-cutting challenges facing the PCRP.

2.1   Overview of the National Park Service Cultural Resources

All park units managed by the NPS have cultural resources within their borders, with many units being specifically designated for the care of the nation's cultural resources. As of July 2022, the NPS manages 423 parks covering over 85 million acres across the United States.[6] In 2021, the NPS employed approximately 20,000 permanent, temporary, and seasonal employees.[7] The NPS operates a regional system to manage its parks and resources. Regional offices oversee park activities and programs and provide support services to the parks and their Superintendents.

Stewardship of cultural resources is an integral part of each park's mission and a core NPS responsibility, fulfilling its charge to preserve and protect the nation's historical and cultural heritage.[8] Part of the NPS's mission is to preserve places and things that are historically and culturally unique and tell the story the United States. All parks contain rich cultural resources, including historic structures, archeological sites, collections of artifacts, and places that hold meaning for a variety of people.[9] Because of the importance of cultural resources to the parks' mission and the United States at large, there is certain requisite cultural resources knowledge including specialized degrees, trainings, and certifications, needed to properly manage and care for these resources. In addition to upholding the mission, the NPS is required, by law, to preserve and protect cultural resources in compliance with a series of federal statutes. The federal statutes pertaining to cultural resource preservation include:

- **The NPS Organic Act (1916):** The act declared the fundamental purpose of the National Park System as to conserve the scenery, the natural and historical objects, and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

---

[6] "About Us, National Park System", *National Park Service*, Accessed March 18, 2022.
https://www.nps.gov/aboutus/national-park-system.htm
[7] "About Us, Frequently Asked Questions," *National Park Service,* last updated February 22, 2022.
https://www.nps.gov/aboutus/faqs.htm
[8] "Frequently Asked Questions," *National Park Service.*
[9] Frank Hodsoll, James Kunde, and Denis P Galvin, *SAVING OUR HISTORY: A Review of National Park Cultural Resource Programs*. pp. 1-13.

National Academy of Public Administration

- **The Historic Sites Act (1935)** established a "national policy to preserve for public use historic sites, buildings, and objects of national significance for the inspiration and benefit of the people of the United States."[10] It authorized the Secretary of the Interior to research and preserve sites with cultural resource significance and initiated the coordination of federally owned parks, monuments, and historic sites.[11]
- **The Museum Act (1955)** authorized the National Park Service to accept donations or bequests of museum properties, purchase them from donated funds, exchange, transfer, convey, or destroy them, and receive and grant museum loans.
- **The National Historic Preservation Act (1966)** acknowledged the importance of preserving the nations heritage and formalizes the mandate for the protection of cultural resources. The act set the federal national preservation policy and mandates that all federal agencies include preservation as part of their mission. The act also established several institutions and formal preservation processes: Advisory Council on Historic Preservation, State Historic Preservation Offices, National Register of Historic Places, and the Section 106 and 110 review processes.
- **The Archeological and Historic Preservation Act (1974) (AHPA)** expanded the number of Federal agencies that must account for archeological resources when looking to execute, fund, or license projects and makes agencies accountable for mitigating damages caused by their actions to archeological sites. The AHPA provided authority for federal agencies to fund archeological investigations, reports, and other kinds of activities to mitigate the effects of their projects on important archeological sites. The statute also granted the Secretary of the Interior certain authorities to help federal agencies with the preservation of historic and archeological resources. The Department Consulting Archeologist plays a role in some of these activities.
- **The Archeological Resources Protection Act (1979)** governs the excavation of archaeological sites on Federal and Indian lands in the United States and the removal and disposition of archaeological collections from those sites. The Act also details prohibited activities that include vandalism and unpermitted excavation or removal and provides financial and incarceration penalties for convicted violators.

State, local, and tribal governments are also important stakeholders with their own regulations. The various regulations and compliance processes surrounding cultural resource management make overall stewardship a complex task.

Washington Area Service Office and Organizational Structure

WASO reports to the NPS Director and subsequently the Office of the Secretary of the Interior. WASO manages the NPS relationship with funding and oversight provided by the Congress. It coordinates national issues and provides substantive program area expertise and technical assistance to parks and regions. Within WASO, three Deputy Directors oversee Congressional and External Relations, Management and Administration, and Operations. The Deputy Director of Operations is responsible for the day-to-day functions of the NPS and oversees the six NPS

---

[10] Historic Sites Act of 1935," *The National Park Service*, Accessed November 15, 2022.
https://www.nps.gov/subjects/archeology/historic-sites-act.htm
[11]"Historic Sites Act of 1935," *The National Park Service*

National Academy of Public Administration

Directorates, NPS regions and regional offices, and the Office of Communications. The six Directorates are:

- The Cultural Resources, Partnerships, and Science Directorate (CRPS)
- The Interpretation, Education, and Volunteers Directorate (IEV)
- The Natural Resource Stewardship and Science Directorate (NRSS)
- The Park Planning, Facilities and Lands Directorate (PPFL)
- The Partnerships and Civic Engagement Directorate
- The Visitor and Resource Protection Directorate

Cultural Resources, Partnerships, and Science Directorate (CRPS)

The CRPS is responsible for the stewardship of cultural resources within NPS units and implementing national preservation programs, including working with state, local, and tribal governments, and non-profit organizations involved with cultural resource preservation.

The CRPS has three sub- Directorates: (1) Preservation Assistance Programs; (2) Park Programs and National Heritage Areas (PNHA); and (3) Science, Technology, and Training. The PCRP is a part of the PNHA sub- Directorate and was created to oversee internal, park-based cultural resource management. See Appendix D for an Organizational Chart of the CRPS and PNHA sub-Directorate. While field work is carried out at the regional and park level, staff located in WASO lead individual programs and provide support, guidance, and develop policy that guides regions and parks. At the time of this report, there were 9,008 permanent, 1,011 temporary, and 1,584 term cultural resources employees across the National Park Service, with 21 full-time cultural resources staff assigned to WASO.[12]

2.2   The Park Cultural Resource Program

PCRP activities cover a broad spectrum of cultural resources-based work. NPS staff at the WASO, regional, and park levels are collectively responsible for the stewardship of hundreds of thousands, if not millions, of culturally significant places and artifacts, with numbers continually increasing every year and with the addition of new parks. The WASO PCRP staff are responsible for devising policy and guidance that support the regions and parks that are responsible for the stewardship of the unique resources within their respective borders.[13] Additionally, the WASO PCRP controls a nationally competed fund source that parks and regions can apply to in order to fund specific cultural resources projects at the field level. The following list of six programs, with a short description of each, constitutes the cultural resource programs within the NPS:

---

[12] Data provided by the National Park Service

[13] The PCRP is rooted in the Washington Service Office (WASO) but this report also touches on the cultural resources program as a whole across the NPS. Distinctions of what group is being discussed will be made throughout the report.

National Academy of Public Administration

Figure 1: Overview of Park Cultural Resource Program

Historic Structures:
Preserves and protects historic and prehistoric structures within the NPS through maintenance, stabilization, repair, and documentation. The NPS is responsible for approximately 26,898 currently identified historic and prehistoric structures.
Ethnography:
Conducts research surrounding sites, structures, landscapes, objects, or natural features of significance to a traditionally associated group of people. This research is used to inform park planning, management, and interpretation. The program encompasses multiple studies, such as the Cultural Affiliation and Lineal Descent studies, the Ethnographic Landscape study, and the Ethnohistory study.
Cultural Landscapes:
Preserves and protects historically and culturally significant landscape documentation and preservation in NPS units through maintenance, planning, coordination, and documentation. There are more than 800 known cultural landscapes within the NPS.[14]
Museum Management:
Responsible for one of the world's largest museum systems, with over 123 million items in NPS collections.[15] The NPS preserves objects and specimens from a diverse range of park sites and topics and their associated documentation and archival collections.
Park History:
Conducts research on national parks and historic landmarks, park planning and special history studies, oral histories, and interpretive and management plans. Park History assists in evaluating new park proposals and offers historical expertise to cultural resources personnel in parks, regional offices, and Washington.
Archeology:
Conducts archeological projects within national parks and assists other federal agencies and foreign governments. It provides national leadership, coordination, and technical guidance to parks, regions, and partners to preserve and protect archeological resources. The archaeology program cares for over 80,000 archeological sites that have been identified on NPS lands.

These programs ensure that cultural resources found within parks are appropriately cared for and protected. Data management is an essential piece of properly managing cultural resources and is

---

[14] National Park Service, "About Us, Frequently Asked Questions,";
Frank Hodsoll, James Kunde, and Denis P Galvin, *SAVING OUR HISTORY: A Review of National Park Cultural Resource Programs*.
[15] Frank Hodsoll, James Kunde, and Denis P Galvin, *SAVING OUR HISTORY: A Review of National Park Cultural Resource Programs*.

National Academy of Public Administration

critical to ensuring that park managers and staff have the necessary information and knowledge to manage park resources. A critical component of the NPS ensuring compliance with federal regulations and mandates is the development of baseline documentation for cultural resources. Baseline documentation is a collection of detailed information that depicts the condition of the resource and its attributes necessary for a range of activities from planning to interpretation. The following is a list of "core" baseline documentation that cultural resources staff are responsible for developing at the park level. Further details on baseline documentation are found in Section 3.

Archeology

- Section 110 inventories, as managed in the Cultural Resources Inventory System-Archeology
- Archeological Overview and Assessments
- Archeological Management Plans

Cultural Landscapes

- Section 110 inventories, as managed in the Cultural Resources Inventory System-Cultural Landscapes
- Cultural Landscape Reports

Ethnography

- Section 110 inventories focusing on ethnographic resources and data, as managed in the Cultural Resources Inventory System-Ethnographic Resources
- Ethnographic Overview and Assessments

Historic Structures

- Section 110 inventories as managed in the Cultural Resources Inventory System-Historic Structures
- Historic Structure Reports

History

- National Register of Historic Places and National Historic Landmark nominations and updates
- Determinations of National Register Eligibility
- Historic Resource Studies
- Administrative Histories

Museums

- Accessioning and cataloging of museum collections, as managed in the Interior Collections Management Software System or its successor
- Collections Management Plans
- Museum Facility Management Plans

In addition to the distinct cultural resource programs, the WASO PCRP also houses the NPS Section 106 Coordinators Office. This Office is responsible for ensuring compliance with Section 106 of the National Historic Preservation Act. The Office coordinates Servicewide policy and guidance pertaining to compliance and assists regions and parks when questions about the process arise. See Section 3 for a more detailed discussion of Section 106 compliance.

2.3 Director's Order #28

As previously mentioned, the WASO PCRP is responsible for developing and coordinating Servicewide policies and procedures to ensure proper cultural resources preservation. The foundational document guiding this stewardship of cultural resources is Director's Orders #28 (DO28). DO28 supplements the NPS's Management Policies Handbook with detailed instructions on management decisions and activities to guide effective cultural resource research, planning, and stewardship. DO28 was signed on June 11, 1998, with a sunset date of June 11, 2002. Despite the sunset date, the policy document has not been updated during the past two decades and is still in effect at the time of this report.

DO28 is complemented by the NPS-28: Cultural Resource Management Guideline. This guideline elaborates on cultural resource management policies and standards and offers guidance in applying these standards to establish, maintain, and refine the park-based cultural resources programs.[16] It was created to aid park managers, planners, staff, and specialists and emphasizes the need for their involvement in creating a strong park cultural resource program.[17] See Appendix E for an overview of the guideline.

DO28 and NPS-28 are vital management tools that establish the standards for a comprehensive cultural resources program within the NPS at a national level. However, this is only part of the larger cultural resource management process that involves NPS staff at all levels. Integration of cultural resource preservation into park operations and management requires understanding of these special resources and the importance of long-term stewardship and preservation from each park. Park managers and individual park employees are responsible for ensuring this guideline is implemented and that cultural resources in every NPS unit are properly managed.

2.4 Previous Academy Evaluation of the PCRP/CR Challenge

As noted in Section 1, the Academy conducted a study for the NPS in 2008 to evaluate the stewardship of park cultural resources. The Academy's goal was to: (1) assess the appropriateness of current performance measures and targets and suggest alternatives for consideration; (2) evaluate how current performance measures are being used in budget, resource allocation, and management decisions, and suggest improvements; and (3) recommend other changes to improve NPS stewardship of park cultural resources. That report contained 18 recommendations listed in Appendix A. As a general focus, these recommendations called for the more rigorous application of management instruments such as prioritization, tracking and evaluating performance metrics, accountability, staff training, better use of information technology, performance management,

---

[16] "NPS-28: Cultural Resource Management Guideline," *The National Park Service*, Accessed November 15, 2022. https://www.nps.gov/parkhistory/online_books/nps28/28intro.htm
[17] "NPS-28: Cultural Resource Management Guideline," *The National Park Service*.

and addressing backlogs in various aspects of the NPS's entire cultural resources program and its various programs' workflows.

By all accounts, the CRPS accepted the report's findings and earnestly worked on implementing the various recommendations. A focus was placed on re-organizing components of the CRPS to create operational efficiencies and increase communication between WASO and field offices. However, CRPS leaders indicate they were limited in their ability to respond to all report recommendations due to limited resources, staff capacity, and the unfortunate timing of higher priority NPS initiatives.

One of the recommendations of the 2008 report called for the NPS to "undertake an intensive Servicewide effort to develop a comprehensive proposal, clear priorities, and sound justification to improve stewardship of park cultural resources and seek increased funding and permanent staff to reduce risks to cultural resources of national significance and meet other critical needs."[18] This recommendation prompted the CRPS to develop a document entitled "Cultural Resource Challenge" (CR Challenge). The CR Challenge set out five overarching goals for the future of cultural resources management:

1. "Provide leadership, support, and advocacy for the stewardship, protection, interpretation, and management of the nation's heritage through scholarly research, science, and effective management.
2. Recommit to the spirit and letter of the landmark legislation underpinning the NPS mission, as expressed in the Organic Act, the Antiquities Act, the Historic Sites Act, and the National Historic Preservation Act, through which the American people have made clear their desire for the protection and preservation of our historic and cultural resources.
3. Connect all Americans to their heritage resources in a manner that resonates with their lives, legacies, and dreams, and tells the stories that make up America's diverse national identity.
4. Integrate the values of heritage stewardship into major initiatives and issues such as renewable energy, climate change, community assistance and revitalization, and sustainability, while cultivating excellence in science and technical preservation as a foundation for resource protection, management, and rehabilitation.
5. Attract, support, and retain a highly skilled and diverse workforce, and support the development of leadership and expertise within the National Park Service."[19]

The document provided accompanying action steps for the Directorate to accomplish these goals.

The five goals in the CR Challenge identified critical funding priorities and were tied to requests for budget increases. According to the identified critical funding priorities, a substantial increase in cultural resources funding would be needed to achieve the goals set out by the document. While the CR Challenge was finalized and circulated within the Directorate in 2016, the accompanying budget requests were never approved, apparently based on the lack of cultural resources priorities and insufficient metrics. The recommendations offered in this report provide a basis for a more

---

[18] Frank Hodsoll, James Kunde, and Denis P Galvin, *SAVING OUR HISTORY: A Review of National Park Cultural Resource Programs*
[19] National Park Service Cultural Resources Stewardship, Partnerships, and Science, *Cultural Resources Challenge: NPS Cultural Resources Action Plan for 2016 and Beyond*, 2016

focused and persuasive budget request that will enable the entire PCRP, including WASO, region, and park cultural resource staff, to make more progress on the overarching stewardship objectives of the NPS cultural resources programs.

2.5 High-Level Cross-Cutting Challenges Facing Cultural Resource Management within the NPS

Several high-level cross-cutting challenges impacting cultural resources management within the NPS are mentioned throughout this report. These challenges impact the WASO PCRP in almost all its functions, ranging from creating efficient processes to effectively managing resources. The following segment of this section is an overview of three major themes that are repeated and referenced throughout the report.

Organizational Structure of the NPS

The organizational structure of the NPS is highly decentralized. Each park Superintendent has authority over their park and controls all park resource allocation decisions, which can lead to fragmented cultural resource management across the NPS, with each park having a different approach to managing these resources. While the WASO PCRP's leaders can create policies and guidance and set goals and actions they would like the parks to accomplish, such as the aforementioned CR Challenge, they do not have direct authority to control the actions and management decisions at the park level. This challenges the WASO PCRP in creating and ensuring standardized cultural resource management processes.

Strategic Direction

Because the overarching cultural resources policy document, DO28, has not been updated since 1998 despite having a 2002 sunset date, NPS cultural resources staff are left to follow outdated policies. Additionally, due to the decentralized nature of the NPS, the WASO PCRP does not have the authority to dictate the work of the parks or regions. Decentralization of authority, combined with the diminishing resources available to cultural resources (including the number of cultural resource professionals in the field) has led, in many cases, to an unstandardized approach to managing cultural resources across the NPS. While there have been attempts to set strategic goals for cultural resource programs at the national level, such as through devising and approving a CR Challenge, as mentioned above, none of these plans have successfully united the NPS around a singular focused vision for park-based cultural resources management.

Resources and Responsibilities

The cultural resources programs within the NPS have received relatively flat budgets and decreasing professional cultural resources staff over the past 10 years; while at the same time, the number of cultural resources and related management responsibilities have increased. The limited resources available and increasing responsibilities places pressure on the PCRP staff both in WASO and cultural resources staff at the regions and parks to ensure the necessary research, planning, and stewardship of these precious resources as well as complete mandatory cultural resource compliance work and maintain a unified standard of care.

Section 3: Processes and Structures

The NPS is a steward of many of America's most important natural and cultural resources. It is charged to preserve them unimpaired for the enjoyment of present and future generations. Every park in the system has a rich and complex variety of cultural resources. To focus attention on management requirements within these property types, NPS Management Policies categorizes cultural resources as archeological resources, cultural landscapes, structures, museum objects, and ethnographic resources. The WASO PCRP oversees management of seven major cultural resource types within the NPS. The individuals who serve as national program administrators work with parks and regions to provide direction and Servicewide guidance for the identification, protection, preservation, and interpretation of park cultural resources. Because of the complexity in managing a wide range of cultural resources, the NPS relies on policies and operations procedures to manage the day-to-day and long-term stewardship of these objects.

This section provides: (1) an analysis of the status of internal PCRP processes and structure, touching on WASO, regions, and parks; (2) best practices in terms of setting up overarching structures and processes for an organization; and (3) recommendations and strategies for the NPS to bridge the gaps between the two and establish effective and efficient processes that make the best use of PCRP resources.

3.1 Current State

Before elaborating on the status of the current organizational structure and internal processes within the PCRP, it is important to reiterate that the PCRP is a title created for this report in consultation with NPS. As noted in Section 2, the PCRP refers to a group of cultural resources programs, run nationally at the WASO level that support regional and park operations.[20]

The current state of the PCRP's organizational structures and guiding processes are largely impacted by the demands that arise due to a perennial lack of resources outlined in more detail in Section 4. While this section examines the related challenges facing the internal organization and procedures carried out by the PCRP, it is important to acknowledge that these challenges are widely recognized by NPS staff. While there have been concentrated efforts to remedy them such as revised training and increased efforts on cross discipline communication and collaboration, relatively few solutions are viable unless adequate funding and staff resources are available.

Strategic Direction of the PCRP

Given the decentralized lines of authority, each park and region are solely responsible for the research, planning, and stewardship pertaining to the cultural resources within their borders. Director's Order 28 (DO28) is one of the only unifying documents that connects the management of cultural resources across the Service. The WASO PCRP developed this policy document to guide the cultural resource staff at the field level. One of the goals of DO28 is to create a standardized approach in how parks and regions manage their cultural resources and fulfill that critical aspect

---

[20] See Section 2 for details on the specific programs.

of the NPS's mission. As previously noted, DO28 has not been updated since 1998 despite having a sunset date in 2002.

The DO is long outdated with several of its prescribed processes being regarded as inaccurate or burdensome, such as submitting written materials that can now be handled electronically. This creates an ever-present challenge for professional cultural resource staff at the field level and an even bigger challenge for NPS staff managing cultural resources as a collateral duty, a number that continues to grow.

While updating DO28 would be an essential first step to reinvigorating the strategic direction of the cultural resources park programs, there are additional steps that the PCRP, specifically the WASO staff, can take to create a unified approach towards cultural resources management. Parks, regions, and even WASO have their own strategic plans that focus on their specific work. However, strong cultural resource management is an essential piece of the entire NPS's mission and there is a need for the NPS to make more immediate and strategic decisions regarding cultural resources stewardship to address the most pressing challenges of today and which may appear in the future.

One illustration of the opportunity to enhance the program's strategic direction can be seen in the current effort within the NPS for parks to develop a Cultural Resource Stewardship Assessment (CRSA). CRSAs are strategic documents designed to give park leadership an overview of the overall status of cultural resources management at a park and provide direction on how to improve management. Currently, these documents are exclusively park-focused and do not connect across the NPS. If the WASO PCRP were to establish a unified strategic planning document that looks at cultural resource management across the NPS, that document could serve as a linkage between and among CRSAs, creating a more holistic and integrated approach to cultural resources management across the NPS.

> *When everything is a priority, nothing is a priority.*
>
> - *Karen Martin*

A strategic document that provides focused, targeted guidance and priorities in how to manage cultural resources within the NPS is increasingly important. Challenges surrounding a unified strategic direction for cultural resources management have impacted how projects and cultural resources are funded and prioritized. While cultural resources are precious, the prioritization of assets within the NPS portfolio is worthy of careful consideration, especially given the continual number of cultural resources being added to the NPS collections almost daily, and the continued shortfall of financial resources and professionally trained staff dedicated to cultural resource management.

A focused and targeted strategic document can also guide an organization on to address the most pressing problems, something which is not emphasized in long-term policy documents. One example of an ever-increasing external threat is the impact of climate change on cultural resources. Natural factors, such as weathering,[21] have always posed challenges for protecting cultural resources. Current climate change projections indicate that not only will these threats continue but the severity and number of these threats will increase at faster rates. This Strategy

---

[21] Weathering is the process of an object being worn and deteriorating due to long exposure to the atmosphere.

identifies a broad array of potential cultural resource impacts due to climate change and identifies "major directions of action in cultural resources and climate change for the NPS".[22] It is important to note that the funding for this Strategy has continued to be a challenge for the CRPS given its perennial lack of resources and the Directorate has had to rely on the support of the NRSS. Despite this challenge, this Strategy is a strong example of how cultural resources can set priorities within its larger mission of protecting and preserving cultural resources.

There have been prior attempts to set a direction for the management of cultural resources, the most notable of which being the CR Challenge. However, these plans were not successful due to the timing of other NPS initiatives, the lack of backing resources, and what appears to be a lack of dedicated staff with accountability in ensuring the success of the initiative. Despite not having the authority to directly control actions of the field, the WASO PCRP could establish a shorter-term strategic vision for the management of cultural resources that complements the policy. It can use "soft influence" such as frequent communication from leadership and aligning the monies WASO does control to incentivize the field to work to create its unified vision for cultural resource management within the NPS.

Overarching Structure and Unification of the PCRP

While the PCRP's leadership is based at WASO, most of the cultural resource field stewardship is carried out at the regional and park level. WASO PCRP staff, however, provide national guidance, oversee the national fund sources, and develop programmatic direction for implementing cultural resource policies and programs at the park and regional level. This circumstance is not unique to the CRPS and is symptomatic of the NPS, that operates with a decentralized organizational model. However, the lack of a centralized PCRP authority at the national level can create difficulties in standardizing and aligning cultural resources management across the NPS, especially when confounded with other challenges such as a shrinking of professionally trained cultural resources staff at the park and regional levels (this point is addressed further in Section 4).

Additionally, while the PCRP is collectively comprised of programs that are rooted in the preservation and research of cultural resources, comparing and aligning these individual programs can be a complicated task. After all, the various disciplines within cultural resources management are vastly different in their focuses and needs. For example, the archeology program's needs and method of operation differ vastly from the processes in the ethnography program, despite both falling under the purview PCRP. This presents a challenge to WASO staff charged with leading the various PCRP programs to manage and align the work objectives of these programs. This complexity in management is exacerbated by the challenge in engaging the parks and regions which is becoming more essential as parks and regions do not have staff with the professional cultural resources skills required to carry out the guidance and policy set at the WASO level. Given challenges in capacity at the park and regional level, WASO staff are tasked with coordinating across the cultural resources' programs, regions, and parks to organize and harmonize cultural resources management across the NPS, despite themselves not necessarily having the capacity or authority to do so.[23]

---

[22] *Cultural Resources Climate Change Strategy*
[23] Challenges regarding PCRP WASO staff capacity are elaborated in Section 4

Despite these structural obstacles, there are continued ongoing attempts to align the various programs and levels of cultural resource management within the PCRP to create a standardized approach toward park cultural resource management. One of the notable efforts in this area is the utilization of the Cultural Resources Advisory Group (CRAG). The CRAG "serves as the principal advisory body to the national NPS cultural resources." Its membership contains regional and park representatives who serve to advise program managers and senior leadership within the CRPS who meet to advise the Associate Director of the CRPS.[24] It is important to note that the scope of the CRAG does extend beyond the park-based programs within the CRPS. However, as one of the main convening bodies of the various levels of cultural resources managers, the CRAG's value to the management and organizational structure of the entire PCRP cannot be overstated.

While, in theory, the CRAG should serve as a foundational structure for how the cultural resources are managed across the NPS, its current function does not make the best use of its potential for aligning cultural resource program management and organization. The CRAG, as currently organized, is not seen as providing useful results. Staff at the various levels see these meetings as often being devoted to updates from and to senior CRPS leadership with little opportunity for collaboration across regions and parks or opportunities to discuss overarching challenges and best practices in implementing WASO directed guidance such as DO28. There is limited advisory capacity within the current CRAG structure, and the updates that are provided are often deemed isolated in focus. Stakeholders find that, in part, the current siloed nature of the CRAG is also related to the absence of strategic direction from leaders of park cultural resources.

Operational Processes

Cultural resources parks programs have many functional procedures outlining how preservation and care should be carried out by the various cultural resource programs at the park and regional levels, many of which are established in DO28. It is important to note that the cultural resources work within the NPS is much more than compliance with federal laws and regulations. The research, planning, and stewardship of cultural resources beyond mandatory compliance are essential parts of the NPS mission. However, with diminishing staff capacity and dwindling of supporting resources, cultural resources work has been reduced to focusing increasingly on mandatory work such as regulatory compliance. This sub-section focuses on two important and related processes connected with PCRP tasks at the WASO, regional, and park level: (1) mandatory compliance process and (2) cultural resources projects and baseline documentation.

Compliance Processes

Some of the PCRP's day-to-day internal processes are required by law and are part of nationwide requirements on cultural resource preservation. As mentioned in Section 2, the passage of the National Historic Preservation Act (NHPA) in 1966 established a nationwide "comprehensive program to preserve the historical and cultural foundations of the nation as living part of community life."[25] Part of the NHPA mandated federal agencies to consider the impact of cultural and historic preservation in project planning and ongoing programs. As one the federal agencies

---

[24] *Cultural Resources Advisory Group Role & Function Statement* provided by the National Park Service.
[25] "Overview of Sections 106 & 110 of the National Historic Preservation Act", *The National Park Service,* Accessed June 21, 2022. https://www.nps.gov/dscw/cr-nhpa.htm

responsible for managing the largest number of cultural resources, the NPS is responsible for a large swath of work related to the NHPA, specifically regarding the regulatory compliance standards outlined in Section 110 and Section 106 of the Act.

Figure 2: Overview of the Section 106 Process

Section 110 delineates responsibilities of federal agencies to ensure that historic preservation is integrated into ongoing programs, such as ensuring that historic properties are appropriately managed. Section 106 requires agencies to account for the effects of potential projects and their impact on cultural resources, including historic properties either listed or eligible to be listed in the National Register of Historic Places. Section 106 is a highly collaborative process that requires an agency to identify and consult with stakeholders such as State Historic Preservation Offices (SHPOs), the Advisory Council on Historic Preservation (ACHP), Tribal Historic Preservation Offices (THPOs), and other consulting parties. Figure 2 to the left outlines the Section 106 process at a high level.[26]

Initiate the Process

Identify Historic Properties

Identify Any Adverse Effects

Resolve Concerns

Many NPS operations require large numbers of regular low-impact or repetitive activities that might require consultation under Section 106. Because of this, to alleviate time and resources, a Programmatic Agreement (PA)[27] was established between the ACHP, and the National Conference of State Historic Preservation Officers, and the NPS. The PA "provides an efficient process for compliance with Section 106 for daily NPS park operations, management, and administrative activities" by establishing two processes for Section 106 review.[28] The first is a "streamlined" review for specific projects that meet the criteria set out by the PA, and the second is a "standard" review process for all other undertakings. The NPS is required by law to comply with the PA and this agreement was established to create efficiencies in compliance processes. However, NPS staff, internal and external to cultural resources, cite that despite the PA existing, in practice, the cultural resources compliance processes, specifically Section 106, remain overly burdensome.

While the NPS outlines that "the purpose of Section 106 review is not to stop projects, but rather to ensure that federal agencies fully consider historic preservation values and the views of other

---

[26] "An Introduction to Section 106." *Advisory Council on Historic Preservation*. Accessed June 21, 2022. https://www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106
[27] The Programmatic Agreement between the National Park Service, The Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers can be accessed here.
[28] Advisory Council on Historic Preservation, *Programmatic Agreement Among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act,* November 14, 2008. https://www.achp.gov/sites/default/files/programmatic_agreements/2019-04/nw.nps_.Nationwide%20PA.14nov08.pdf

agencies, tribes, organizations, and the public during project planning and decision making," that is not a viewpoint widely held by NPS staff.[29] Section 106 requires professional knowledge of both cultural resources and the nuances of the PA. As Section 4 will further detail, there is an ongoing erosion of the capacity of cultural resources staff. With fewer NPS employees having the necessary cultural resources knowledge and training, Section 106 implementation is seen as overly complicated and time-consuming. NPS staff also allude to the fact that outside of professional cultural resources staff, it is not widely understood when the PA and related "streamlined" processes can be utilized, leading to adoption of unnecessarily complicated compliance processes.

Often, cultural resource compliance work is a required component in NPS larger projects and other NPS Directorates rely on the work of the cultural resources staff. NPS staff outside of the CRPS can perceive the Section 106 review as a barrier to accomplishing these larger projects, creating tension between cultural resources staff and other parts of the NPS. This lack of a unified understanding between the PCRP/CRPS and the rest of the NPS on proper cultural resource management will be elaborated on in Section 5.

While Section 106 adherence is seen as a challenge, there are established internal structures and ongoing projects being led by the WASO PCRP and the CRPS to alleviate these challenges and introduce process improvements to help streamline the work. The WASO PCRP team created updated guidance on the PA framed as a "PA Toolkit" designed to give all NPS staff an overview of the Section 106 process, including how and when to utilize the PA's flexibilities.[30] In addition, the WASO PCRP and CRPS have teamed with the PPFL to facilitate trainings and webinars on the PA to expand expertise about how to properly use the PA and comply with the law. All these initiatives were adopted to spread knowledge and alleviate any perceived burdens in complying with the legal requirements of Section 106.

There are additional mechanisms built into the NPS structure to help park staff with cultural resource compliance. Parks and regional offices have an established Section 106 coordinator[31], and there is a Section 106 manager housed within the WASO PCRP. These positions were established to create a point of contact for these processes, to assist park staff, and answer questions about complex Section 106 issues. However, these structures struggle with having the adequate resources to properly assist in the Section 106 process. Notably, the Section 106 manager within WASO is only one person with no support staff. Similar nationwide compliances in other NPS Directorates such as the NEPA Office on NRSS have multiple staff members and resources and are still challenged to keep up with their respective compliance work. This lack of capacity is especially poignant when looking at the increased compliance processes required for projects with new NPS funding sources, such as the Great American Outdoors Act (GAOA). With the number of these projects continually rising, having the necessary staffing capacity, and ensuring the cultural resource compliance processes are followed are increasingly important. A positive step the CRPS has made in increasing capacity in the compliance area is the recent

---

[29] "Overview of Sections 106 & 110 of the National Historic Preservation Act"
[30] The date of the release of the "PA Toolkit" is anticipated to be in late Summer 2022.
[31] Park based Section 106 coordinators do not have to be cultural resources based staff or have a set understanding of the cultural resource disciplines.

National Academy of Public Administration

addition of the first ACH liaison, a position dedicated to investigating additional efficiencies in compliance and coordinating with the ACH.

However, staff familiar with the compliance process suggest that even with these updated processes and mechanisms, the PA is outdated and needs to be updated to respond to the current state of cultural resources. While updating and implementing new guidance on the PA addresses the critical need for staff to understand how to correctly achieve Section 106 compliance and utilize the PA's flexibility, it does not fully address the root of the inefficiencies. The PA was last updated in 2008 and does not include an expiration date. Having no expiration date may be beneficial in its own right, as it allows continued flexibility and avoids a requirement to renew it on a regular basis. However, there are benefits for these types of agreements to be periodically reviewed to consider possible amendments that would create increased efficiencies.

While this sub-section has been focused on challenges surrounding internal NPS compliance process fulfillment, it is important to highlight that these challenges are part of a larger framework of cultural resource management and that adhering to compliance processes is mandated by law. Many other federal agencies involved with managing cultural resources face similar challenges regarding proper Section 106 and 110 fulfillment and have developed trainings and resources to help alleviate burdens. However, largely due to a lack sufficient supporting resources, the NPS has continually faced challenges in having the capacity necessary to complete compliance processes in a timely fashion.

Project work and baseline documentation

The cultural resources park programs are engaged in many other projects designed to preserve and protect cultural resources at parks beyond mandatory compliance work. As described in Section 2, the WASO PCRP controls the Cultural Resource Project Fund (CRP Funds) source which funds cultural resources-based projects at the park and regional level. These funds are allocated towards projects that support "interdisciplinary research, documentation, stabilization, and conversation of NPS cultural resources, and directly support the goals of resources stewardship, relevance, and education."[32]

The current guidelines for parks and regions submitting projects for CRP Funds emphasize the fund source's focus on establishing cultural resource baseline documentation. Baseline documentation are data/documents required by law and are essential to help "park managers have the minimum level of information necessary to manage their resources."[33] These documents describe the status of a set of cultural resources within a park's care and provide recommendations on what is needed to preserve and maintain those resources and can be critical components in compliance processes.

The decision to utilize CRP Funds for these projects came from an NPS WASO analysis of baseline documentation which found significant gaps in park cultural resource baseline information. This analysis found that 95 percent of cultural resources baseline documentation projects needed for proper park management were unfunded, indicating a clear need to focus limited resources on

---

[32] *Cultural Resources Fund Source – FY 2024 Servicewide Comprehensive Call Program Guidance* provided by the National Park Service
[33] *Cultural Resources Fund Source – FY 2024 Servicewide Comprehensive Call Program Guidance*

National Academy of Public Administration

funding said projects.[34] To help better focus the use of CRPS Funds, the CRAG designated a select list of "core" baseline documentation, deemed essential to park research, planning, and stewardship, that are prioritized in the application for use of CRPS Funds.

While these projects are essential to preserving cultural resources, staff cite challenges with the current process for establishing baseline documentation. PCRP and NPS staff deem while these documents are necessary, the current process for establishing baseline documentation overly burdensome and time-consuming especially given the diminishing number of professionally trained cultural resources staff at the field level. Due to the limited time and resources of cultural resources-based staff at the park level, these projects are commonly contracted to external parties. However, with declining professional cultural resources staff,[35] when these projects are completed, there can be limited staff at the park who have the requisite knowledge to help management interpret and utilize the findings. This can lead to these costly reports being underutilized.

In addition to being critical to fulfill the NPS's mission to protect and preserve cultural resources. These documents are required by law and help ensure that cultural resource stewardship is incorporated within larger NPS projects. For example, when the PPFL engages in a project involving an historic structure, an Historic Structures Report needs to be established to help plan to avoid any potential damage to it. As previously stated, the current process for developing these reports is often seen as being too complex and including extraneous information on areas not relevant to the larger project at hand. . The time required to complete these thorough reports can be lengthy, potentially delaying other NPS projects that rely on the establishment of updated baseline documentation. There may be opportunities to revise how documentation can be updated efficiently and effectively without placing undue strains on cultural resource capacity at the field level.

Efforts are underway to address some of the challenges related to CRP Fund projects and baseline documentation. A team within the CRPS at WASO has been working to develop a new process to streamline specific components of cultural resources baseline documentation. The Historic Property Project Documentation (HPPD) process provides a framework for a project team to meet the standards required for research and planning of cultural resources specifically related to cultural landscapes and historic structures.[36] This process does not replace the need for a traditional Historic Structures Report, as it is important to the overall stewardship of cultural resources. However, it does give teams flexibility in fulfilling specific cultural resources compliance requirements necessary within more extensive projects. This addresses the demands of baseline documentation containing extraneous components not required for compliance fulfillment and adding to overall project timelines. The HPPD process is in the final stages of development and is expected to be introduced at the beginning of the 2023 calendar year. While the HPPD process will not eliminate the need for established baseline documentation, it will give NPS staff a more flexible and scalable process, better adapted to current needs.

---

[34] *Cultural Resources Fund Source – FY 2024 Servicewide Comprehensive Call Program Guidance*
[35] See Figures 3 and 4 in Section 4.
[36] *Draft Historic Property Project Documentation* provided by the National Park Service

National Academy of Public Administration

3.2   Recommendations

There are opportunities for the PCRP to enhance its organizational processes and structures to create further operational efficiencies. Specifically, these opportunities exist in looking to improve existing organizational structural barriers, updating overarching policies and setting a strategic direction for the program that prioritizes work, and updating and streamlining internal processes to be flexible and scalable. While there is a related challenge of having the requisite resources to support operational advancements, the recommendations outlined in this section aim help create further efficiencies within the management of cultural resources across the NPS and better utilize its existing resources.

Strategic Direction of the PCRP

The PCRP and CRPS can enhance its overall cultural resources management framework by updating DO28 and its related processes and handbooks. Doing so will help ensure that cultural resources management is more standardized across the NPS, and that field staff have tools necessary to manage their unique cultural resources. In addition to updating the overarching cultural resource management policy documents, the WASO PCRP should establish focused, incremental priorities for cultural resources management. This will facilitate NPS's ability to prioritize specific cultural resources management activities needed to address the most pressing challenges presently, and in the future.

Given the broad scope of the Directorate's tasks, with its internal and external focuses, all components of the organization must be considered and incorporated within its overarching vision guiding the focused priorities. The priorities should not merely serve as an inventory of organizational activities. Rather, they should build from DO28 and explain how the activities support a theory of action connecting activities to desired outcomes. The process for developing priorities should guide engagement with all parks, regions, and cultural resource programs. To ensure these priorities are actionable, objectives and goals should be developed with related metrics and strategies. These priorities should set clear actions for the various organizational components that can be woven together with the goal of operating towards shared priorities.

The PCRP and CRPS should look for examples of strong strategic visions and related engagement processes that have already been established within the NPS and draw on previous engagements to guide this effort. For example, the Natural Resource Stewardship and Science (NRSS) Directorate created a strategic planning document entitled the "National Park Service Natural Resource Stewardship and Science Framework" which supports a foundation for all NPS natural resource work activities, establishes four overarching priorities for natural resource management, and emphasizes collaboration and cross-discipline learning in supporting processes. The CRPS also previously attempted a similar priority setting engagement when it developed the CR Challenge. Although it was not successful as it was envisioned, it is a strong starting point for the WASO PCRP staff to develop focused priorities for cultural resource management.

The publication of an updated DO28 and short-term priorities will not, by itself, create the standardization of cultural resource management. It must be supported by processes to engage staff in the various parks, regions, and cultural resource programs to work toward the established strategic vision and plan. As mentioned, park and regional staff are responsible for managing the

cultural resources within their borders and have park and region-specific strategic plans to guide their work. The CRPS and the PCRP should use the established WASO priorities to set a strategic direction for cultural resources management across the NPS and engage with the wider NPS on this vision. The priorities should fit within larger NPS goals such as current NPS Director goals and should be regularly reviewed to ensure that they match current challenges facing the program.

Establishing strong guiding policies and short-term priorities is a large undertaking for any organization and may be especially challenging for the PCRP given its organizational context – the decentralized nature of the NPS, and limitations in resources. To support this undertaking, the PCRP should adopt leading change management practices that support strategic planning (discussed in Section 6).

Recommendation 3.1: Update Director's Order 28 and its supporting handbook to create efficiencies in cultural resources management across the NPS. Incorporate the progress the PCRP has already made in creating operational and management efficiencies such as the HPPD and CORE baseline documentation guidance.

Recommendation 3.2: Utilizing the updated Director's Order 28, develop short-term priorities for cultural resources management that fit within NPS Director's goals. Periodically revisit and refocus these priorities to match current programmatic needs. This strategic document should build off of larger NPS goals such as current NPS Director's goals and be used to frame how cultural resource management is essentially to accomplishing Servicewide priorities.

Overarching Structure and Unification of the PCRP

The NPS is largely decentralized in its organizational structure, with each park and region responsible for its unique resources. Cultural resource management has also faced diminishing, insufficient levels of necessary resources. As a result, the implementation of cultural resource management and the programs within the PCRP can be vastly different at the WASO, region, and park level. There is an opportunity to work toward better standardization of cultural resources management to ensure that all NPS employees are working towards the same vision. The PCRP can better align the various programs and levels of cultural resources management around strategic priorities. Increased alignment and a consistent focus across the PCRP will contribute to efforts to introduced to increase standardization of how cultural resources are managed across the Park Service, which should create greater efficiencies in utilizing PCRP resources.

Given the limited cultural resource management capacity and lack of trained professionals at the field level, WASO PCRP staff nevertheless are responsible for unifying and aligning cultural resources management by developing overarching policies and Servicewide guidance. Doing so may place exacerbated strain on limited WASO staff who also deal with capacity and limited resource challenges.

Research on people-driven organizations raises several concerns that merit discussion. People-driven organizations often suffer from bottlenecks and are constrained by the skills and resources

of the people driving the organization.[37] As a result, people-driven organizations can be vulnerable and incoherent in their structure due to limited resources available to staff and staff potentially moving positions or leaving the organization.[38] Moving a towards a process-driven leadership structure allows an organization to become more resilient and adaptable.

A process-driven organization achieves its mission by procedurally managing actions.[39] Process-driven organizations depend on institutionalized knowledge, quality control, replication, and adaptability.[40] The PCRP should refocus its organizational structure to be centered around processes that are driven by updated policy, strategic guidance, and a unified set of short-term priorities. This will allow the PCRP to build a more resilient organizational framework. This new organizational framework is not intended to add another bureaucratic layer to the PCRP. Instead, it aims to increase standardization and alignment across the PCRP centered around a clear purpose.

The PCRP already has many tools that could enable the refocus of its organizational structure. For example, the role of the CRAG could be revitalized as the conveying body for cultural resources. The CRAG can be utilized as a reviewing body as DO28 is updated and can help with rolling out the updated policy guidance to the field. The CRAG can also be more actively involved in advising the AD on achieving NPS Director Goals and setting short-term priorities for cultural resources that drive standardization and align with overarching goals. Once DO28 is updated and short-term priorities are set, the CRAG could work to align the various programs and advise parks and regions on how to accomplish said priorities within cultural resources management. Focusing the convenings of the CRAG around a set of consistent priorities across the NPS will help drive a standard approach for cultural resources management across the NPS.

Another tool that can guide the standardization of cultural resources management is "centralized centers of excellence." As the CRPS and PCRP consider the constraints on resources and the increase in responsibilities, there are additional opportunities to explore focused centers of excellence. The term "center of excellence" means a group of subject matter experts having a shared area of focus that provides support to organizational colleagues through training, process support, planning, and decision making. Centers of excellence are designed to improve the reach of expertise across organizations that may be challenged by decentralization.[41] This can further promote standardized processes and adoption of priorities for cultural resources management. The NPS already has established functional centers of excellence that the CRPS and PCRP can look to as exemplary structures. The Denver Service Center is the central planning, design, and construction management office for the NPS, and the Historic Preservation Training Center is the NPS's dedicated hub for overseeing and managing historic preservation processes.

---

[37] "What's Driving Your Organization? Personalities, People, or Processes?," *the IllumiLab*, last modified December 18, 2017, https://www.insightsintoimpact.com/whats-driving-organization-personalities-people-processes/

[38] "What's Driving Your Organization? Personalities, People, or Processes?"

[39] Narasimhan Gopalkrishnan, "Process Driven or People Drive," *Kaizen Institute*, last modified March 28, 2018, https://in.kaizen.com/blog/post/2018/03/28/process-driven-or-people-driven

[40] "Process Driven Organizations," *Management Study Guide*, Accessed June 22, 2022. https://www.managementstudyguide.com/process-driven-organizations.htm

[41] "Everything You Need to Know About Centers of Excellence," *Catalant*, Accessed June 22, 2022. https://gocatalant.com/coe-everything-you-need-to-know-about-centers-of-excellence

National Academy of Public Administration

Given the present limited capacity for cultural resources management in the NPS, especially at the field level, moving to a centers of excellence model could potentially relieve some of the many resource burdens. While this opportunity has not been examined in depth in this report, it merits NPS consideration.

Recommendation 3.3: Refocus the structure of the PCRP around process-driven resource management that guides the standardization of cultural resources management. Unite the different parks, regions, and cultural resource programs around the established cultural resources management priorities.

- **Refocus the Cultural Resources Advisory Group (CRAG) to focus on the cultural resources management priorities. Ensure that CRAG members have or develop the necessary change management expertise to support this refocused initiative.**
- **Use the CRAG as a reviewing body that provides guidance on how to use an updated Directors Order 28.**
- **Use the CRAG to assist the CRPS AD in establishing short-term priorities for cultural resource management that fit within the NPS Director's goals.**
- **Explore opportunities to establish cultural resource centers of excellence. Begin by identifying areas where cultural resource management support is most needed.**

Operational Processes

The PCRP has the opportunity update its operational processes to be more targeted at addressing fundamental cultural resources management needs. The updated HPPD process is an excellent example of how a process can be designed to address fundamental challenges within cultural resources management while giving a park or regional team greater flexibility within a more extensive project framework. Updated processes should be designed to offer staff a larger vision of cultural resources management while also allowing staff to scale that vision to the priorities of what cultural resources should look like at a particular park.

The PCRP should look towards balancing how to identify and blend enhanced efficiencies from standardization with benefits derived from allowing some flexibility in process steps. At first glance, these two features – standardization and flexibility – may seem to be in tension with one another, particularly if either standardization or flexibility are extreme. For the PCRP some level of standardization is beneficial to support efforts to introduce a unified approach for cultural resources management. However, due to the diverse nature of cultural resources, some process flexibilities may need to be accommodated as well. When implemented in a thoughtful balanced manner, both process standardization and process flexibility enhance performance improvement. The goal is to develop Servicewide cultural resources priorities with enough consistency and enough flexibility processes that each park can meet its needs.

Recommendation 3.4: Making use of an updated Director's Order 28, create flexible and scalable cultural resources management processes and align them with Servicewide priorities for cultural resources management. Actions include:

- **Re-evaluate current compliance processes to identify opportunities to create efficiencies and reduce paperwork burdens. Start with the compliance and baseline documentation processes utilizing the Historic Property Project Documentation (HPPD) as a pilot program for incorporating flexibility and scalability into existing processes.**

Section 4:   Resources

The resources available to the PCRP include the funding and staffing to execute each cultural resource program's work. The following three statements constitute this report's premise of the current and near-term status of the PCRP with respect to resources and workload: (1) the PCRP has not been allocated increases in human or financial resources through appropriations over the past decade; (2) has likely been operating with an increased volume of tasks (many of which are obligatory under law); and (3) imminent allocation of materially significant increased funding is not expected. With these features setting boundaries to the current and near-term scenario, this report pivots to focus on how the PCRP might more effectively and efficiently manage its resources to accomplish its mission of preserving and protecting the cultural resources entrusted to its care.

This section provides: (1) an analysis of the status of the PCRP's current resource environment; (2) best practices in terms of aligning resource needs with organizational goals; and (3) recommendations and strategies to bridge gaps between the two and better monitor and utilize PCRP resources.

4.1   Current State

The PCRP's funding comes from the Operations of the National Park System (ONPS) budget appropriation. ONPS appropriations provide operating funding for parks, partner organizations, central offices, and program offices.[42] ONPS appropriations are deployed to ensure "parks preserve and commemorate natural and cultural resources that are woven into our national heritage."[43] The ONPS appropriation comprises two budget lines: Park Management and External Administrative Costs. The External Administrative Costs budget line includes funding support necessary to provide and maintain services that represent administrative support functions where costs are primarily determined by organizations outside the NPS and funding requirements are less flexible, thus they will not be addressed in this report for those reasons.[44] The Park Management budget line "covers the management and operation of park areas and Servicewide programs."[45] Within Park Management, there are five functional areas that ONPS funds:

1. Resource Stewardship
2. Visitor Services
3. Park Protection
4. Facility Operations and Maintenance
5. Park Support

Resource Stewardship is the functional area applicable to the PCRP. It encompasses resource management operations that provide for the protection and conservation of unique natural,

---

[42] The United States Department of the Interior, National Park Service, *Budget Justification and Performance Information Fiscal Year 2023*, https://www.doi.gov/sites/doi.gov/files/fy2023-nps-greenbook.pdf.
[43] National Park Service, *Budget Justification and Performance Information Fiscal Year 2023*.
[44] National Park Service, *Budget Justification and Performance Information Fiscal Year 2023*.
[45] National Park Service, *Budget Justification and Performance Information Fiscal Year 2023*.

cultural, and historical features of the NPS.[46] From the ONPS appropriations, the PCRP relies on resources coming from three primary sources:

Park Funding[47]
Each park receives a base fund for its internal operations. This money is used to pay for staff at the park and necessary preservation and maintenance work. A park's base funding is under the direct control of its Superintendent, "who operates their park within the broad policy guidance of the NPS Director, relevant Regional Directors and in conformance with authorizing legislation in order to achieve the park's core mission and mission support activities."[48] Park Superintendents can dedicate money to fund cultural resources based on staff at the park level or cultural resource-based projects from this fund source.
Park Cultural Resource Support Functions and Central Offices
Regional Offices and WASO oversee funds specifically dedicated to the care of cultural resources at the park level. These funds include special initiatives regarding cultural resources and support functions. These appropriations also fund dedicated cultural resources professionals at Regional Offices and WASO.
Cultural Resource Project Funds (CRP Funds)
CRP Funds support "interdisciplinary research, documentation, stabilization, and conversation of NPS cultural resources, and directly support the goals of resource stewardship, relevance, and education."[49] These are cultural resources projects beyond the parks' funding capabilities and are designed to preserve, protect, and provide information about the diverse array of NPS's cultural resources.[50] CRP Funds are not intended to fund permanent staff because the amounts are not seen as predictable as those sourced from appropriated funds.

Human capital costs must be included as a separate category to fully present the capacity of the PCRP. Professional cultural resources staff are NPS employees who have specialized experience and meet a standard of professional qualifications in managing cultural resources. In addition to dedicated cultural resources staff at the park level, professional cultural resources staff are located in the Regional Offices and WASO. They lead cultural resources programs and support parks in managing cultural resources. Figure 3 below shows the number of professional cultural resources staff as of the same date annually across the NPS since 2012. These numbers do not reflect collateral duty NPS staff who are asked to oversee cultural management and might not have training within cultural resources disciplines. Over the last 10 years, the number of professional cultural resources staff has decreased by 17.5 percent, dropping from 1,236 to 1,020 as of May 20, 2022. A particular area where staff has seen a steady decline is at the WASO level, as shown in Figure 4.

---

[46] National Park Service, *Budget Justification and Performance Information Fiscal Year 2023*.
[47] While most NPS parks rely on ONPS appropriations for base funding, large parks can use visitor fee funds to fund internal park activities and staff.
[48] National Park Service, *Budget Justification and Performance Information Fiscal Year 2023*.
[49] National Park Service, *Budget Justification and Performance Information Fiscal Year 2023*.
[50] National Park Service, *Budget Justification and Performance Information Fiscal Year 2023*.

Figure 3: Professional Cultural Resources Employees Within NPS FY12-21[51]
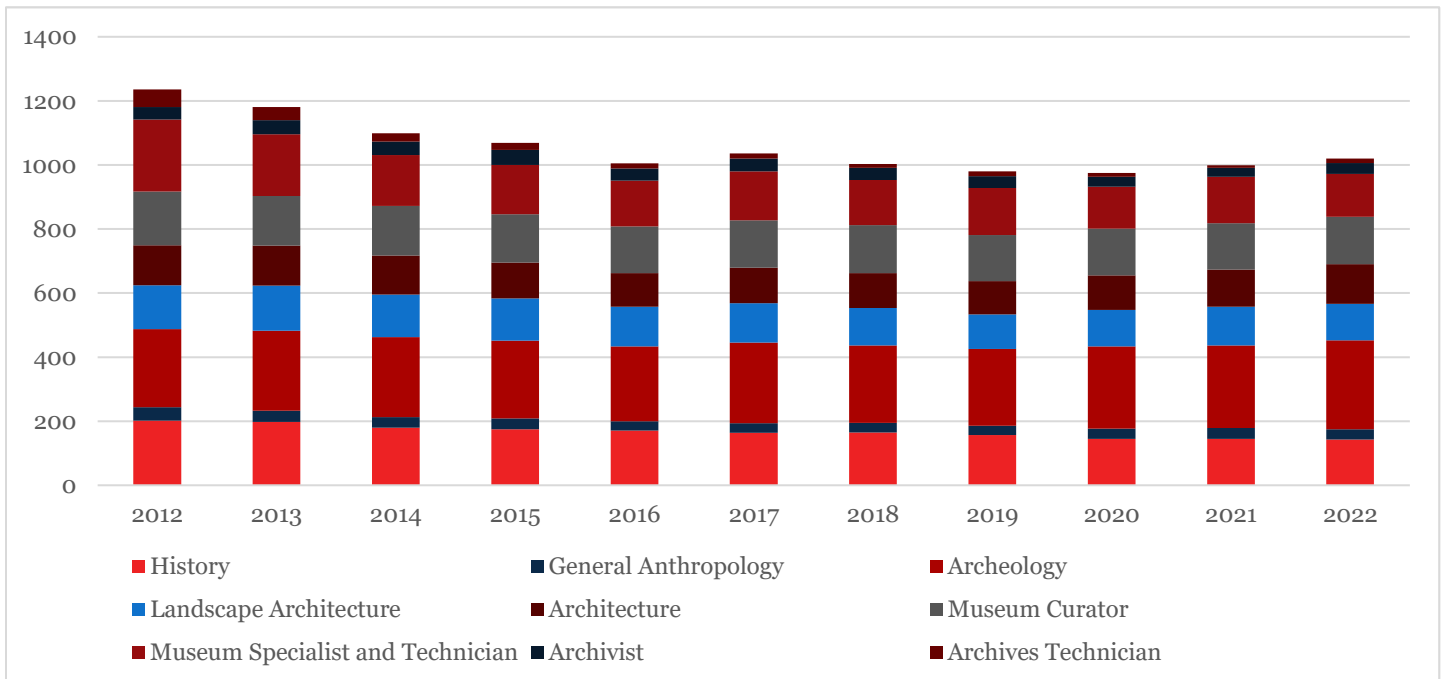
Source: National Park Service

Figure 4: Number of Professional Park Cultural Resource Program Staff at WASO
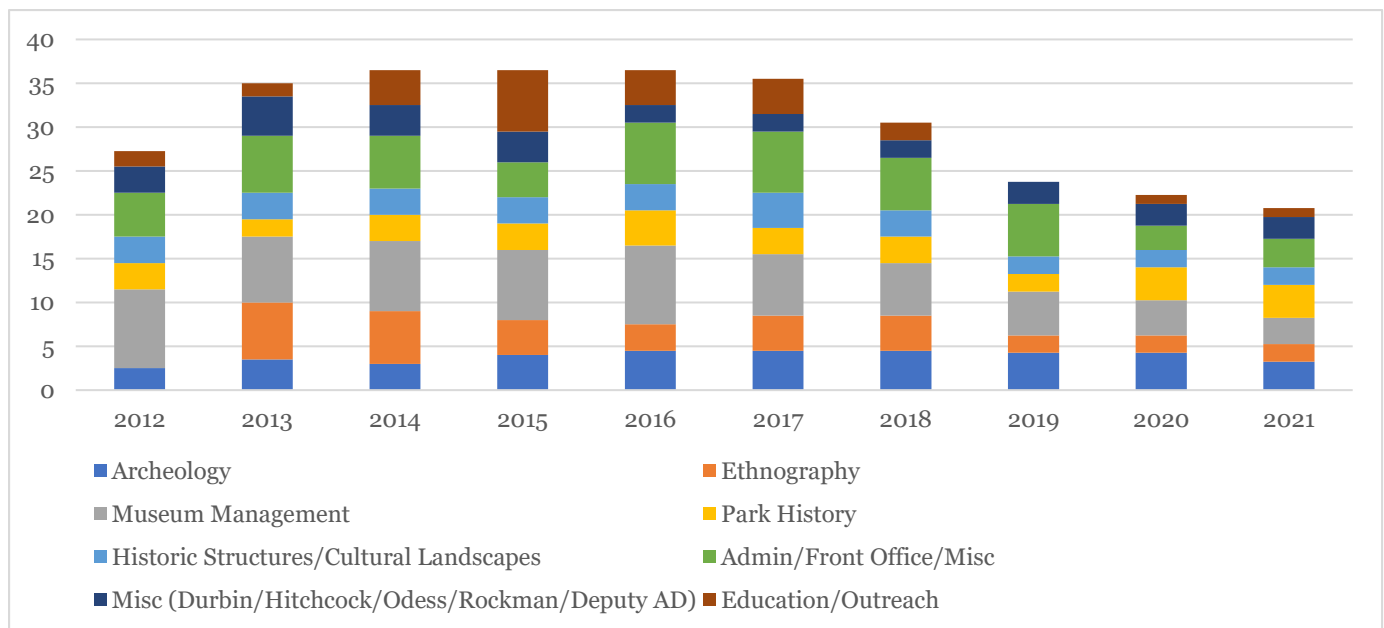
Source: National Park Service

[51] Please note that the architecture job series is broad and cannot be broken down by specialist. The numbers shown on this graph include both cultural resource specialized architects (cultural landscapes, historic structures, etc.) and general architects who are not necessarily cultural resources professionals.

31

In addition to professional cultural resources staff, many parks rely on employees in collateral duty positions to care for cultural resources. These staff members are not cultural resources experts and can lack formal cultural resources training or requisite knowledge. The number of employees who have collateral duty responsibilities for cultural resource management is not available. However, anecdotally, it is recognized that the number of employees performing collateral duty responsibilities is increasing due to resource constraints and the decrease in professional cultural resources staff.

The PCRP's ONPS appropriations over the past ten years are presented in Figure 5.[52] This figure illustrates that the PCRP has received relatively unchanged funding levels for the last decade (note that budget figures are not adjusted for inflation and thus suggest a more significant decrease in funding over the last ten years).

Figure 5: Cultural Resource Total Dollars Appropriated in ONPS for Park Management

Source: National Park Service

Fewer dedicated professional cultural resources staff and anecdotal accounts of an increasing reliance on collateral duty positions at the park and regional level suggest a decreasing workload capacity within the program areas dedicated to cultural resources management. While the NPS does not collect and track work volume data connected to the PCRP to allow one to accurately evaluate how the volume of wo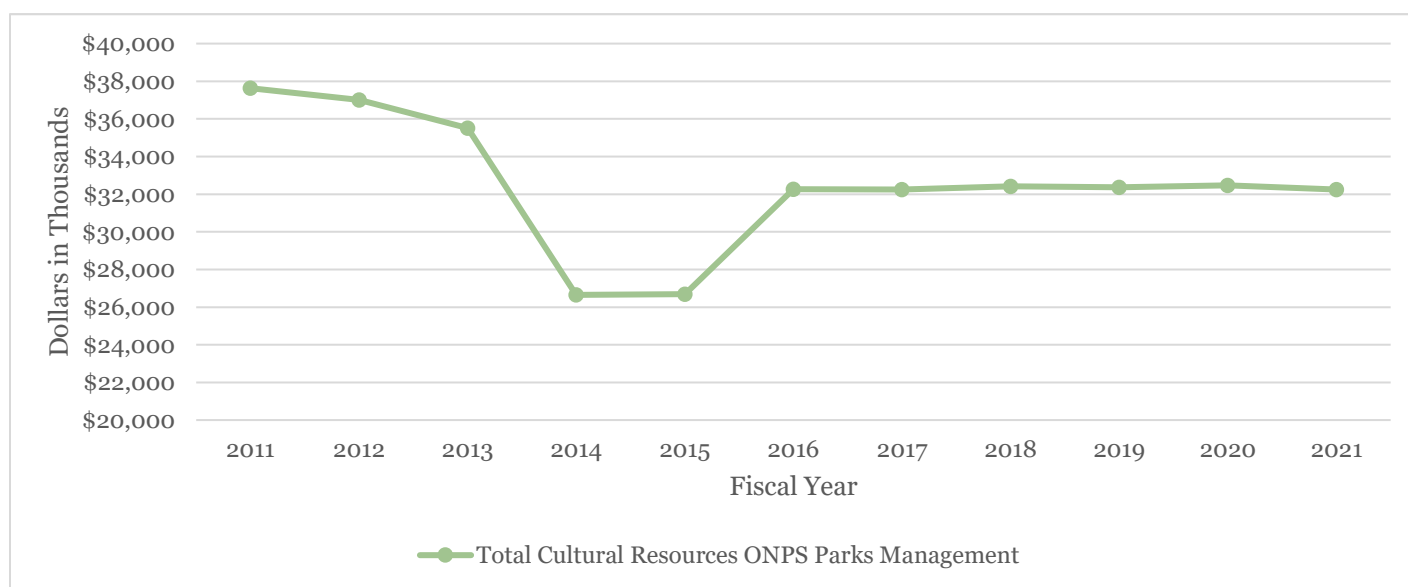rk and staffing levels are related over time, there are observations connected with the overall workload that can be noted. First, there has been an increase of 32 parks since 2011, all of which require some level of cultural resource-related care and many are cultural resources parks, suggesting an increased workload.[53] Furthermore, the NPS recently

---

[52] This graphic does not include the funding the each NPS park dedicates to cultural resources preservation from their park budget. This graphic is mainly focused on the funding of the PCRP Central Offices, NPS-wide cultural resources initiatives, and CRP Funds.

[53] National Park Service, *The National Parks 2009 – 2011: Official Index of the National Park Service*, https://www.nps.gov/parkhistory/online_books/nps/nps/part1.htm, Accessed June 21, 2022; National Park Service, "About Us," https://www.nps.gov/aboutus/national-park-system.htm, Accessed June 21, 2022.

received a substantial influx of funds through the Great American Outdoors Act (GAOA) to "provide needed maintenance for critical facilities and infrastructure."[54] Many of these new and ongoing maintenance projects connected with GAOA will require some level of mandatory cultural resources compliance work, further adding to the PCRP's workload now and in the coming years.

The decline in funding and in staffing levels helps underscore an argument that PCRP's resources are likely insufficient to address what appears to be an increasing workload.

Resource Management

This section focuses on how the PCRP manages its finite resources. The following three themes are addressed: prioritizing funding, tracking, and evaluating expenditures of program funds, and communication of program performance.

Setting Priorities. A key element of successful resource management is the ability to prioritize what should be done; and the converse – activities that should be eliminated or de-emphasized in terms of resource investments. As previously mentioned, CRPS leadership is working on a strategic plan that will have ties to the PCRP. This initiative shows a positive shift

> *Don't tell me where your priorities are. Show me where you spend your money and I'll tell you where they are.*
>
> - *James W. Frick*

towards the PCRP working with increased focus; however, the effort could face resistance in establishing priorities at the regional and park levels. WASO, as a support office, does not have the authority to establish cultural resources priorities at the regional and park levels through a self-made strategic plan. As a result, PCRP leadership may use Director's Order 28 as the tool to help guide setting budgetary priorities.

Due to the Directorate's charge of preservation and protection and the large number and variety of cultural resources, PCRP leaders recognize an imperative to improve upon how project funds are prioritized by embedding strategic goals and related priorities into the budget formulation process.

Tracking and Evaluating Program Expenditures. As noted in Section 3, CRP Funds support park-based projects across the array of park-based cultural resources programs. There is no systematic effort to track fund utilization, nor is there a central repository for documentation related to this tracking. As a result, projects can occasionally be duplicated.

Communicating Impacts. Additionally, the PCRP is not always able to communicate program needs and impacts because it lacks the requisite evaluative metrics to support budget requests. The case for budget requests could be more powerful if it included quantitative data to demonstrate the impacts of reduced or unchanged budgets on key mission outcomes. Additionally, opportunities exist to articulate a clear linkage between resources and prioritized

---

[54]National Park Service, "Legislative and Congressional Affairs, Great American Outdoors Act," https://www.nps.gov/subjects/legal/great-american-outdoors-act.htm, Accessed June 21, 2022.

program achievements that clarify what PCRP could accomplish with more resources that would advance NPS goals.

Capacity

A conversation around capacity requires consideration of resources available and the complexity and volume of the PCRP's workload at the park, regional, and WASO levels. Due to employee departures and stagnant funding levels, the PCRP has many vacant positions on paper. While the data noted earlier in the report present the PCRP's staffing numbers over the last 10 years, the total number of vacant cultural resources positions throughout the parks and regions is not an available metric. However, interviews reveal that many parks and regions lost cultural resources positions within the last ten years. Directorate leaders have no complete understanding of where cultural resources position needs are or which open positions are most critical.

As noted earlier, staffing decisions at the park level are made by Park Superintendents who face their own resource constraints. In some cases, Superintendents do not have the requisite knowledge to comprehend the complexity of the cultural resources at their parks. Due to resource limitations at the park level, many cultural resource management responsibilities have been handed to non-cultural resources experts in collateral duty positions. While committed to providing the best care and stewardship possible, these individuals may not have the time or knowledge required to provide high-quality care for cultural resources. As a result, according to interviews, the standard in care for cultural resources has generally diminished and is not standardized across parks.

Cross- Directorate Resources Sharing

The PCRP plays a vital role in supporting other NPS Directorates' work. Staff from the CRPS, NRSS, PPFL, and Interpretation and Education Directorates recognized that there has been significant progress made in relationship building, collaboration, and cooperation across the four Directorates. PCRP staff from the park, regional, and WASO levels note and broadly appreciate efforts made by their leaders to enhance the working relationship between the PCRP staff and their counterparts in other Directorates.

The increased number of projects generated by GAOA funding has created a greater reliance on the PCRP to ensure that new maintenance projects have the necessary cultural resource compliance processes completed. Notably, the PCRP did not receive any of the GAOA funds despite having an increase in GAOA-related work. Due to this continual and increasing reliance of other Directorates on the PCRP to fulfill necessary cultural resources compliance statutes, working relationships between the Directorates should remain a significant opportunity to realize how a force multiplier for PCRP like collaboration across Directorates can advance a common project goal.

4.2   Recommendations

While not abundant, there are opportunities for the PCRP to improve the management of its funding and human capital in an operating environment characterized by limited resources. Presuming that prospects for sizable funding increases are unlikely, PCRP staff can improve on

the following five areas: (1) strategic resources management; (2) tracking and activities reporting; (3) communication of budget priorities; (4) understanding of where its workforce needs to be deployed; (5) and building relationships with the other Directorates to take advantage of resource sharing.

The CRPS strategic plan, while not available for review in preparing this report, should be clear in identifying Directorate goals. Shaped by Director's Order 28, the two documents should serve as guidelines for budget formulation to be presented to the NPS budget office, DOI leadership, OMB, and eventually congressional appropriators.

The differences among parks make it difficult for cultural resource leadership to prioritize projects and promote standardization in cultural resource management across the parks. There are opportunities to tie CRP Funds to cultural resources management priorities that come out of the current strategic planning effort. By doing so, PCRP leadership could connect the wide variety of park cultural resourcs projects to Directorate strategic goals, which will lead to greater policy standardization and enhance cultural resource preservation.

Recommendation 4.1: Apply strategic cultural resources goals and objectives into:

- **The PCRP budget formulation process; and**
- **Cultural Resource Project Funds allocation criteria.**

In addition to a recommendation for more strategic resource management, the PCRP has an opportunity to better track and report how funds are used for cultural resource activities. The PCRP staff will benefit from a formal mechanism to help them track and house documents for cultural resources projects to enhance project management and avoid duplication of work. Currently, the NPS has two systems, the Cultural Resources Inventory System (CRIS) and Project Management Information System (PMIS), that could be adapted to enhance the tracking, monitoring, and housing of documents.

Recommendation 4.2: Track, monitor, and report how funds are utilized. Actions include:

- **Track how Cultural Resources Project Funds are allocated for each project and create a capability to readily access these documents;**
- **Analyze how Cultural Resources Project Funds are being used and prioritize areas of critical importance;**
- **Develop uniform metrics to facilitate evaluation of how effective resource investments are; and**
- **Utilize established metrics in preparing budget requests to highlight programmatic impacts attributed to reduced or unchanged funding to all appropriate stakeholders and illustrate what the PCRP can achieve with increased funding.**

Capacity

A workforce analysis would point PCRP leaders to where the most significant capacity gaps in its organization exist. Thus, it would facilitate PCRP leaders' ability to work with park

35

Superintendents, Regional Directors, the NPS Budget Office, and NPS senior leaders to prioritize positions that are critical to fill. This effort would help drive a standardized approach from cultural resources management and provide further transparency to NPS leaders as to the PCRP's capacity challenges.

Recommendation 4.3: Conduct a comprehensive workforce analysis on cultural resources needs to understand where critical staff member capacity shortfalls exist.

Cross- Directorate Resources Sharing

There are opportunities for the PCRP to further advance its ongoing efforts to collaborate and share resources with Directorates on projects that require joint engagement. These actions can support Servicewide goals to maximize staff and funding resource use. These efforts may result in resource sharing and improved understanding between the Directorates to ensure projects proceed in a timely manner.

Recommendation 4.4: Continue to emphasize and explore how collaboration with other Directorates can serve as a force multiplier and enhance timely project completion rates.

National Academy of Public Administration

Section 5: Communications and Customer Service

Communications and customer service are essential for the PCRP to convey the importance of cultural resources management across the NPS and to external stakeholders. This section provides: (1) an analysis of the status of current communication and messaging mechanisms utilized by the PCRP for interacting with internal and external stakeholders; (2) best practices in terms of communicating needs and priorities across an organization as well as ensuring high-quality customer service; and (3) a recommendation and related strategies for the PCRP to build and strengthen unified messaging. This section reinforces the recommendations made in the two previous sections of this report (Section 3 on Processes and Structure and Section 4 on Resources) and expands on how the implementation of those outlined changes can be strengthened with enriched communication and customer service efforts.

5.1 Current State

Communications, both internally within the PCRP and externally with outside stakeholders, are essential to maintaining the integrity of cultural resources within NPS. This sub-section explores how the PCRP communicates with its internal and external stakeholders and areas where there are opportunities to enhance current efforts.

Internal Communications

Communication is vital to ensuring successful cultural resources management across the parks, regions, and cultural resource programs. Quality communication can engage all PCRP employees and other stakeholders and unite them around a shared vision of successes. Currently, PCRP leaders can face substantial hurdles in constructing a unified message about the needs and priorities for cultural resources management. This is in part due to the unique needs of each park and region, and the diversity of cultural resources across the NPS. However, as a result, various PCRP components have divergent understandings of how to properly manage cultural resources, leading to the inconsistent management and use of resources across the Service. This can be particularly detrimental when considering the scarce resource environment in which they operate.

Unified messaging is especially important for managing park cultural resources, given the decentralized lines of authority within the NPS. Although PCRP leaders have the ability to establish policies and high-level priorities to guide cultural resources management in the field, they do not have the authority to mandate that parks align their actions with these priorities. Park Superintendents make final decisions on allocating resources and the activities conducted within their parks. Because of decentralized lines of authority, it is imperative for WASO and PCRP leaders to establish their influence through alternative approaches. These opportunities for alternative types of influence manifest themselves in two clear ways within the NPS organization: (1) align the funding and resources controlled by WASO and PCRP leadership with established targeted priorities (as previously discussed in Section 4) and (2) establish a unified message that is emphasized throughout the NPS and is reiterated and supported by enhanced communications with the parks and regions (as previously discussed in Section 3).

External Communications

Beyond communicating with parks, regions, and the cultural resource programs that are responsible for carrying out cultural resources management, the PCRP must communicate its needs, vision, and importance to external stakeholders. The term "external stakeholder," in this case, can be defined as other Directorates and NPS employees who do not have the technical training to understand the nuances of cultural resources management and related needs and processes. External stakeholders also include the public and other entities with a vested interest in NPS cultural resource management such as State Historic Preservation Offices.

Communications with the NPS

Cultural resources management is a fundamental component of the NPS mission. However, given limited resources and capacity to dedicate to communications, collaboration, and strategic messaging, the PCRP has sometimes struggled to communicate its work, the processes for accomplishing it, and why the work of the PCRP is essential to NPS operations. The PCRP's work and its importance are not well understood by NPS employees in Directorates outside of the CRPS. PCRP employees find that this knowledge gap is exacerbated by the declining number of professional cultural resources staff, leading to further misunderstandings of cultural resources management across the NPS. The lack of Servicewide understanding is a fundamental mission challenge for the NPS as it is essential that NPS staff at large comprehend the importance of cultural resources stewardship as it relates to the NPS mission. While this knowledge gap is not the fault of the PCRP, the PCRP is challenged to address it.

Because of this knowledge gap surrounding the importance and relevance of its work, cultural resource management processes can be viewed as a barrier to project progress. This barrier can threaten the quality of working relationships between professional cultural resource staff and other NPS employees. That said, the Directorates have attempted to break down certain silos through increased communication and collaboration with other NPS Directorates.

For example, knowing that the impacts of climate change are seen across the NPS, the NRSS established the NPS Climate Change Response Program. While this program is housed within the NRSS, this is a collaborative effort across Directorates that aims to look at how climate change is impacting all NPS resources, including cultural resources. The CRPS has recently onboarded two dedicated full-time employees who are imbedded within this program. While this program is focused on cross programmatic work, communication is essential to its success including coordinating efforts across Directorates, explaining the unique challenges to certain resources, and creating messaging that engages the broader public in how climate change is impacting all resources within the NPS. The PCRP can build on this initiative and continue to improve working relationships by increasing communication to explain how its work is accomplished and why its tasks are essential to fulfilling the NPS's mission.

Communications with the Public

PCRP staff believe that cultural resources stewardship struggles to fit into the larger narrative of the NPS. While the mission of the NPS is to "preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of

this and future generations,"[55] PCRP employees report that the cultural resources part of this mission can overlooked or undervalued. Anecdotally, there is a widely shared perspective that when the public thinks of the NPS, they often think of the "crown jewel" parks and their natural vistas but often overlook the enormous number of items that constitute the collection of cultural resources found in parks.

The PCRP has the opportunity and obligation to convey a targeted, strategic message on the importance of cultural resources in parks to share with the public and other external stakeholders. To fully capitalize on this opportunity, the PCRP can look to how peer organizations that oversee the management of similar cultural resources communicate to the public. The NPS has already identified over 20 potential stakeholders in the cultural resource field including the National Parks Conservation Association and Parks Canada. These stakeholders can be collaborators as well as a source of promising practices in communicating cultural resources with the public. For example, due to the complex technical knowledge required to understand the nuances of cultural resource stewardship, communicating the importance of cultural resources is a challenge commonly faced across the field. In response to this challenge the Smithsonian Institution created an internal communication office staffed with experts to help publicize some of the many cultural resources within its collection. While the Smithsonian Institution does not face the same challenges that the PCRP does with brand identity and has more resources and ability to dedicate more internal capacity to communication, the PCRP can look to the Smithsonian's efforts to identify what type of communication, including messaging and format is most successful in engaging the wider public and building awareness about cultural resources stewardship.

While NPS now does some public messaging about cultural resources, the messaging is fragmented. Each park and program typically manage its own social media accounts and develops messaging unconnected with other locations and programs. Creating a unified message on park cultural resource management and its importance opens the opportunity for the PCRP to better connect with the larger NPS and public.

Customer Service

Customer service is a crucial component of how the PCRP communicates with internal and external stakeholders. Customer service actions include the messaging and support provided by an agency to those who rely on and utilize its resources and programs.[56] Due to the wide span of the PCRP's mission to ensure the protection and conversation of cultural resources, its "customers" range from cultural resources staff at the park and regional level to other NPS Directorates and the public.

Customer service in this context can appear in many ways. For example, internal customer service can be seen as WASO staff providing guidance and support to parks on cultural resources management through internal processes such as the CRAG or the CRP Fund Source. External

---

[55] "About Us." *National Park Service*

[56] "Customer service in government," *Deloitte*, Accessed June 22, 2022. https://www2.deloitte.com/us/en/pages/public-sector/articles/customer-service-in-government-satisfaction.html

National Academy of Public Administration

customer service can appear as the PCRP working with other NPS Directorates to ensure that the necessary cultural resources stewardship and preservation activities, including mandated compliance processes, are completed and interacting with the public to show the importance of NPS cultural resources.

Due to capacity and resource constraints as well as unclear priorities and a rising volume of resources within the NPS's care, the PCRP can struggle to provide its customers with a standardized approach to service and support. The PCRP can reevaluate how the actions carried out by the program impact its stakeholders and what is needed to provide the best support possible given its limited resources. While each park is unique and requires targeted solutions, there are opportunities to align customer service with the PCRP's priorities and unified messaging within increased communication efforts. Bolstering and aligning customer service processes within the PCRP can also help to dismantle silos and misunderstandings about cultural resource management.

5.2   Recommendation

The PCRP will benefit from unified messaging to share with internal and external stakeholders and guide consistent high performance of cultural resource management.

The PCRP should work on establishing clear and open lines of communication across the parks, regions, and WASO so that established, unified messaging can be shared consistently. WASO PCRP should develop a centralized message containing target priorities that are high level enough to be adaptable and implemented at all regions and parks. This communication must reach all levels of the PCRP so that priorities are understood and can be accomplished in as much of a standardized way as possible. The PCRP should establish open feedback loops between leadership, the parks, regions, and cultural resource programs to support these enhanced internal communication efforts. This will ensure that the messaging is continually updated as needed and will help establish a strong connection as to how individual employees work is a part of the larger mission of the PCRP.

Externally, unified messaging will help to engage with stakeholders to ensure that the value and importance of the PCRP's work is understood. This will help the PCRP better engage with other NPS components, opening the possibility of closer collaboration with the PCRP. Sharing unified messaging with external stakeholders, including the public, will increase awareness of the importance of cultural resource preservation to the NPS mission and the nation and can position the PCRP to take advantage of new opportunities in the future. Potential actions that support the creation of a unified message on cultural resources stewardship within the NPS include consolidating to few centralized accounts and establishing targeted priorities to build media campaigns around. While this effort will require dedicated time and resources, it could lead to higher investments and returns to cultural resource programs in the long run.

The PCRP has or can continue to take a vital role in many national initiatives, such as the reflection on the semi-quincentennial of the United States - America 250. However, the potential value that the PCRP offers in supporting these initiatives may not be widely understood. Creating and disseminating a unified message on the importance of cultural resources management will help position the PCRP to continue to and expand its critical role in NPS messaging in the future.

The PCRP can reevaluate its customer service processes and align customer support with unified messaging and established priorities to support revitalized communication efforts. Deloitte Services LP's Center for Government Insights suggests that agencies consider four areas when looking to enhance customer service:[57]

1. "Think from the customer's perspective": Examine the program from their customer's perspective to understand what is expected and the gaps between expectations and what is currently provided.
2. "Move from transactions to experiences": Move from focusing on the final product/action to thinking about the services it provides holistically and examine opportunities to improve all aspects of processes.
3. "Think about touchpoints across silos of the organization": Examine where there are silos in support of cultural resources management across the NPS.
4. "Take a new approach to information": Collect data on customer experiences, perceptions, etc., to guide and deliver an experience that the customers desire.

The PCRP can also draw on established NPS customer service processes and guidelines. For example, within PPFL's organizational values, the Directorate outlines the importance of customer service and examples of exemplary practices such as high levels of professionalism. While the customers and services provided by the PCRP are substantially different than PPFL, the PCRP can use this document as a starting point to revitalize its own customer service processes.

Through revitalizing communication and customer service efforts, the PCRP has the opportunity to create a standard approach for cultural resources management that is shared and understood by all stakeholders.

Recommendation 5.1: Create a customer service-based communications strategy for engaging with internal and external stakeholders around targeted cultural resources management priorities. Actions include:

- **Facilitate timely and regular communication about goals and priorities among WASO, regions, and parks;**
- **Facilitate timely and regular communication about goals and priorities with other NPS Directorates;**
- **Establish frequent internal communication forums to promote employee engagement through improved transparency, visibility, and employee accessibility to leadership; and**
- **Regularly look for feedback on how to improve engagement and communications.**

---

[57] "Customer service in government," *Deloitte*.

Section 6:   Implementing Recommendations – Action Plan

This section has two segments that provide further guidance to the CRPS and PCRP for implementing report recommendations provided in the preceding three sections. The first segment summarizes well-researched best practices to guide how organizational leadership should plan and go about implementing the report's recommendations. This section segment is prompted by the view that nine report recommendations for PCRP provided in this report should be considered as setting a course to advance a strategic organizational transformation within its Directorate. As such, this section has a concise set of guiding principles to follow to enhance prospects for success.

The second segment of this section provides a recommended sequence to implement the report's recommendations. This provides further insight into how the recommendations build upon one another and require varying lengths of time to formulate and implement. As noted in previous sections, some recommendations are already in preparation and should remain on course to be introduced. As such, this report segment proffers how the parsing out of efforts to incrementally introduce changes can enhance success in realizing organizational transformation.

6.1   Steps to Successfully Guiding Organizational Transformation

This section segment offers summary guidance for the CRPS leadership team to navigate the abundance of challenges that may arise in implementing an organizational transformation represented by the report recommendations. Much is written about managing organizational transformation. The treatment of this topic, while not the focus of this report, is important to

> *Leading organizational change is not rocket science. It's much harder.*

include to assist CRPS leaders to approach accommodation of recommendations for the purposes of driving change. As such, this is not a thorough review and exposition of this topic.

Research literature is rich in this field and there are several respected sources that can be referenced for this segment of the report. The literature broadly provides a generally consistent set of principles to guide a leadership team's efforts to change an organization. For the purposes of this report, the long-standing and widely respected work by Dr. John Kotter[58] on transforming organizations is highlighted for consideration and application by the CRPS's leaders.

Challenges to Organizational Transformation

Implementing this report's recommendations in the context of organizational transformation has several key challenges. First, Directorate leaders are obliged to plan and act on the report's recommendations while simultaneously faced with a plethora of daily tasks to be completed without major interruption. This effort must not be seen as simply an "add-on" duty.

---

[58] "Kotter Methodology," *Kotter,* Accessed June 22, 2022. https://www.kotterinc.com/what-we-do/methodology/

National Academy of Public Administration

Second, there is a penchant for employees to prefer doing what has always been done in the same way it always has been done. Asking employees to do things differently, which is often a part of an organizational change initiative, can be seen as more disruptive than might be expected. Marshall Goldsmith, American business executive and author, is known for this statement: "Whatever got you here may not get you there." While organizational transformation is an objective fraught with challenges, there are certain imperatives connected with a directional zig or zag. A key idea is that leaders need to encourage change by communicating succinctly and forcefully.

Finally, change often prompts anxiety in the minds of employees. What will these changes mean to me? Will I be successful in a new operating environment? "Unknowns" about the future can often raise questions drawn from uncertainty about possible increased workload, new reporting lines, learning new methods and policies, and required new expertise that may challenge some individuals. Thus, successful introduction of organizational change requires relentless and succinct communication to try to replace important employee concerns with a positive message, inviting each colleague to have a hopeful future view.

Summary of Eight Steps to Transforming an Organization

Dr. Kotter offers the following eight steps to help guide leaders to successfully navigate an organizational transformation. These steps are briefly summarized below and can serve as further guidance to the Directorate's leaders in implementing the package of report recommendations.

An organizational transformation effort should be led by someone with the requisite skills designated by the Directorate's leader and granted authority to mobilize staff and drive collaboration required to achieve the objectives. This person will serve as an action officer. The individual should be responsible for devising an action plan to effect the changes and communicate effectively to stakeholders.

The following information provided in Figure 6 below, while not an in-depth discussion of each step, provides brief insights on how Directorate leaders can mobilize, plan, communicate, and shepherd the critical elements of change that this report commends. These are the basic building blocks that merit focus and resources to move toward a more effective and efficient operational profile.

Figure 6: Eight Steps to Guide Organizational Transformation

> **Step 1: Establishing a sense of urgency**
> - Examining market and competitive realities
> - Identifying and discussing crises, potential crises, or major opportunities

43

Step 2: Forming a powerful guiding coalition
- Assembling a group with enough power to lead the change effort
- Encouraging the group to work together as a team

Step 3: Creating a vision

- Creating a vision to help direct the change effort

- Developing strategies for achieving that vision

Step 4: Communicating the vision

- Using every vehicle possible to communicate the new vision and strategies

- Teaching new behaviors by the example of the guiding coalition

Step 5: Empowering others to act on the vision

- Getting rid of obstacles to change

- Changing systems or structures that seriously undermine the vision

- Encouraging risk taking and nontraditional ideas, activities, and actions

Step 6: Planning for and creating short-term wins

- Planning for visible performance improvement

- Creating those improvements

- Recognizing and rewarding employees involved in the improvements

Step 7: Consolidating improvements and producing still more change

- Using increased credibility to change systems, structures,
and policies that don't fit the vision

- Hiring, promoting, and developing employees who can implement the vision

- Reinvigorating the process with new projects, themes, and change agents

Step 8: Institutionalizing new approaches

- Articulating the connections between the new behaviors and corporate success

- Developing the means to ensure leadership development and succession

It is worth expanding on the importance of Step 2 calling for a powerful guiding coalition to lead and oversee the change effort. The implementation team should: (1) consist of staff members with

sufficient rank, respect, and visibility; (2) be accountable for carrying out all change initiatives in a coherent, coordinated way with a focus on high priority areas; (3) be vested with necessary authority to allocate resources and make decisions; (4) have participation from parks and regions considering the interconnectedness of the Directorate with operating units; and (5) be provided sufficient support to ensure they have the capacity for the task.

The qualifications of implementation team members are critical to the guiding coalition's success. Best practice research suggests that a transformation implementation team should be a "cadre of champions." Several factors should be taken into consideration when selecting team members, including titles, expertise, skillsets, reputations, and relationship with senior leadership and key stakeholders. Each member of the implementation team should have the ability to achieve results in a rapidly changing environment, have an adequate knowledge of the organization's operations and services, a thorough understanding of the overall goals of the transformation, and trust and confidence of the top leadership. Additionally, team members are often selected from the organization's top performers.

6.2   Sequencing Implementation of Report Recommendations

While the report's nine recommendations constitute a coherent and interconnected whole, amalgamating them in implementation requires logical sequencing of focus and effort. Some recommendations, being interconnected, build on the development of others. Furthermore, there is a benefit to moving incrementally, bearing in mind that organizations have limits as to the extent of changes that can be effectively accommodated and the daily volume of requisite tasks and duties. Thus, this report proposes that the PCRP approach to action planning be grouped into three phases, described below.

The first two phases are estimated to require about one year of focused effort. The third and final phase is expected to be ready for implementation after about two years, and there is no end date for the efforts outlined in this phase. Each phase's length of time should be deemed an estimate, and the phases often overlap as new domains of work begin. Moreover, some of the work needs to be iterated several times before full consensus is reached. Thus, the time estimates serve as guidelines rather than a precise timeframe. The PCRP may move more quickly or slowly, depending on circumstances that arise during the implementation of the recommendations.

Phase 1: Setting the Foundation – *(Estimated time of 12 months)*

As a starting point, as noted in 6.1, it is essential that action officers be assigned to manage both the report's recommendations and the broader change management project that they represent. Actions during the first phase, entitled "Setting the Foundation," often require about one year to implement. They primarily rely upon internal PCRP analysis and inventory of current resources and processes. This phase aims to establish a robust strategic direction and foundation upon which the PCRP can further develop.

The following four recommendations are proposed in this phase:

- **Recommendation 3.1:** Update Director's Order 28 and its supporting handbook to create efficiencies in cultural resources management across the NPS. Incorporate the progress the

45

PCRP has already made in creating operational and management efficiencies such as the HPPD and CORE baseline documentation guidance.

- **Recommendation 3.2:** Utilizing the updated Director's Order 28, develop short-term priorities for cultural resources management that fit within NPS Director goals. Periodically revisit and refocus these priorities to match current programmatic needs. This strategic document should build off of larger NPS goals such as current NPS Director's goals and be used to frame how cultural resource management is essentially to accomplishing Servicewide priorities.
- **Recommendation 4.1:** Apply strategic cultural resources goals and objectives into:
  - The PCRP budget formulation process; and
  - Cultural Resource Project Funds allocation criteria**.**
- **Recommendation 4.3:** Conduct a comprehensive workforce analysis on cultural resources needs to understand where critical staff member capacity shortfalls exist.

Phase 2: Launching for Growth – *(Estimated time should be during the following 12 months)*

The second phase, entitled "Launching for Growth," sets several actions to be planned for the second year of implementation. This phase calls for continued focus on increasing standardization, quality execution in the PCRP's growth and expansion, and building on outcomes from the previous phase. Actions during this phase focus on rolling out the established strategic direction and priorities to the regions and parks (completed in Phase 1) and beginning to track progress consistent with the agreed-upon strategic direction. This phase aims to build a stronger, more integrated PCRP across the parks, regions, and cultural resource programs.

The following two recommendations are proposed for this phase:

- **Recommendation 3.3:** Refocus the structure of the PCRP around process-driven resource management that guides the standardization of cultural resources management. Unite the different parks, regions, and cultural resource programs around the established cultural resources management priorities.
  - Refocus the Cultural Resources Advisory Group (CRAG) to focus on the cultural resources management priorities. Ensure that CRAG members have or develop the necessary change management expertise to support this refocused initiative.
  - Use the CRAG as a reviewing body that provides guidance on how to use an updated Directors Order 28.
  - Use the CRAG to assist the CRPS AD in establishing short-term priorities for cultural resource management that fit within the NPS Director's goals.
  - Explore opportunities to establish cultural resource centers of excellence. Begin by identifying areas where cultural resource management support is most needed.
- **Recommendation 4.2:** Track, monitor, and report how funds are utilized. Actions include:
  - Track how Cultural Resources Project Funds are allocated for each project and create a capability to readily access such documents;
  - Analyze how those Cultural Resources Project Funds are being used and prioritize areas of critical importance;

- Develop uniform metrics to facilitate evaluation of how effective resource investments are; and
- Utilize established metrics in preparing budget requests to highlight programmatic impacts attributed to reduced or unchanged funding to all appropriate stakeholders and illustrate what the PCRP can achieve with increased funding.

Phase 3: Expanding the Reach – *(Estimated time beyond 24 months)*

The third phase is entitled "Expanding the Reach." It is expected to commence around two years into implementing the previous recommendations. Building on a clear strategic direction that guides operations, there will be increased opportunities for the PCRP to identify and expand operational efficiencies. Actions in this phase include updating and implementing internal processes aligned with the established strategic direction and looking for opportunities to expand the reach of PCRP. This phase aims to better align the PCRP with the larger NPS and expand collaboration with external stakeholders.

The following two recommendations are proposed for this phase:

- **Recommendation 3.4:** Making use of an updated Director's Order 28, create flexible and scalable cultural resources management processes and align them with Servicewide priorities for cultural resources management. Actions include:
  - Re-evaluate current compliance processes to identify opportunities to create efficiencies and reduce paperwork burdens. Start with the compliance and baseline documentation processes utilizing the Historic Property Project Documentation (HPPD) as a pilot
- **Recommendation 4.4:** Continue to emphasize and explore how collaboration with other Directorates can serve as a force multiplier and enhance timely project completion rates.

Change Management Support – *(Ongoing)*:

Recognizing that the organizational changes recommended in this report will take time and resources to complete, PCRP leadership will pay continuing attention to supporting the ongoing change management and to solidifying the support of key stakeholders. These efforts will complement the phased recommendation approach and help ensure the successful implementation of each recommendation. These actions focus on communicating efforts and providing complementary support.

The following recommendation constitutes an ongoing effort.

- **Recommendation 5.1:** Create a customer service-based communications strategy for engaging with internal and external stakeholders around targeted cultural resources management priorities. Actions include:
  - Facilitate timely and regular communication about goals and priorities among WASO, regions, and parks;
  - Facilitate timely and regular communication about goals and priorities with other NPS Directorates;

- o Establish frequent internal communication forums to promote employee engagement through improved transparency, visibility, and employee accessibility to leadership; and
- o Regularly look for feedback on how to improve engagement and communications.

The following graphic visually depicts how the nine report recommendations fit into the proposed phases described above.

Figure 7: Summary of Recommendations Integrated into the Phased Implementation

Phase 1: Setting the Foundation

- Update Director's Order 28 and its supporting handbook to create efficiencies in cultural resources management across the NPS.
- Utilizing the updated Director's Order 28, develop short-term priorities for cultural resources management that fit within NPS Director goals. Periodically revisit and refocus these priorities to match current programmatic needs.
- Apply strategic cultural resources goals and objectives into the PCRP budget formulation process and CRP Funds allocation criteria.
- Conduct a comprehensive workforce analysis on cultural resources needs to understand where critical staff member capacity shortfalls exist.

Phase 2: Launching for Growth

- Refocus the structure of the PCRP around process-driven resource management that guides the standardization of cultural resources management. Unite the different parks, regions, and cultural resource programs around the established cultural resources management priorities.
- Track, monitor, and report how funds are utilized.

Phase 3: Expanding the Reach

- Making use of an updated Director's Order 28, create flexible and scalable cultural resources management processes and align them with Servicewide priorities for cultural resources management.
- Continue to emphasize and explore how collaboration with other Directorates can serve as a force multiplier and enhance timely project completion rates.

Change Management Support

- Create a customer service-based communication strategy for engaging with internal and external stakeholders around targeted cultural resources management priorities.

48

Section 7:   Conclusion

Given the importance of cultural resources stewardship to the foundational mission of the NPS, the PCRP has the challenge and opportunity to drive excellence by managing cultural resources in an efficient and creative manner. To be successful it must employ its scarce resources as efficiently as possible. Effective management of such complex disciplines as historical structure, ethnography, museum management, park history, cultural landscapes, and archeology will secure preservation of cultural resources for generations to come.

While the broad array of PCRP responsibilities has its nerve center in WASO, the work of this relatively small but critical team of employees touches each of the 423 park units across the system. The WASO-based PCRP team, along with about one thousand colleagues of professional cultural resource staff across the system, work in close consultation with regions and parks to address each individual unit's needs. Beyond these professional cultural resources staff, there are many NPS employees who care for cultural resources as a collateral duty responsibility.

Given the decentralized organizational structure of the NPS, there are both opportunities and challenges in how various processes and approaches, priorities, and metrics can be best employed across this expansive network. The lack of a centralized command-and-control organizational culture introduces greater complexity to drive a shared efficient methodology to perform common tasks. It is within this organizational reality that the PCRP can work toward advancing greater operational efficiencies.

This report's findings and recommendations are based on a set of observations concerning the level of resources available to fund the PCRP's work, and an assumption on how resource allocations are likely to change in the near term. First, the PCRP has not been allocated any substantial increases in human or financial resources through appropriations over the past decade. In fact, funding in real dollars and staffing levels have dropped by approximately 14.3% and 17.5% respectively since 2011. Second, the PCRP has an increased work volume (many of which are statutorily required) while the average cost per employee has been rising. Finally, significant additional resources to support the PCRP are not expected.

In this light, a key message of this report is: It is imperative that PCRP leaders prioritize and, selectively, pare back its activities to focus on doing first what is most important.

The report's nine recommendations, listed together both in Section 6 and in the Executive Summary, have the following features. First, each is directed to the PCRP, which has the requisite authority within the greater Directorate to act on them. Second, the recommendations can be implemented without a substantial increase in resource levels allocated to the PCRP. In this sense, the report can be seen as conservative in its assumptions about the future based on interviews and funding/workforce trends. Third, the individual recommendations should be taken as an integrated whole and should be thus considered as a package. Fourth, the package, when implemented, constitutes an organizational transformation. Failed attempts by leaders to introduce and successfully execute an organizational transformation often have deleterious effects on employees. The decision to act on this package of recommendations should not be treated as another routine task, but rather it constitutes a substantial effort.

As a starting point, this report finds the focus and resilience of PCRP staff members in WASO, regions, and parks to be commendable and is a reason why this report takes a positive view of the future. Those who work either part-time or full-time in the field of cultural resource management contribute substantially to the view held by both Americans and foreigners alike that the NPS is one of the America's most valuable treasures due to its highly motivated staff members. This report provides yet another voice supporting this observation.

Recommendations are grouped into three phases, each taking an estimated 12 months or longer. Adding a time element recognizes that some actions will build on previous ones, and that most organizations have limits to accommodating both organizational change and performing on-going daily work (the workload is not likely to abate) during the coming months and years. The timeframes are intended as estimated guidelines to support a diligent, sequenced, and expeditious implementation plan; the length of each phase and timeframe to roll-out individual recommendations may vary for reasons that are controllable by the PCRP and for reasons that are not.

The initial phase includes three actions and is termed "Setting the Foundation." This phase depends on reaching agreement about the urgency of making change and building an internal coalition of support and direction for that change. Each recommendation is focused toward updating overarching cultural resource policy guidance and establishing targeted organizational priorities. Given an anticipated persistent resources challenge, these recommendations urge the PCRP's leaders to prioritize efforts around a smaller list of tasks deemed most critical to the mission., PCRP leaders must employ strategic priorities to empower parks and regions to selectively jettison those activities that ought not remain as part of regular workflow. The combination of staff, funding, time, and workload lead to an environment fraught with zero-sum games. By doing this type of triage in close collaboration across parks and regions, the PCRP can work toward a more standardized, but smaller, list of actions consistently adhered to across all 423 units. Updating policy guidance and establishing strategic priorities is further a springboard for guiding efforts for budget formulation and staffing focus. Completing a workforce analysis for the PCRP, currently underway by the Office of Personnel Management, is the final recommendation in this phase. Doing so will offer line-of-sight into how the PCRP may benefit from selective opportunities to enhance its personnel assets aligned with strategic priorities.

The second implementation phase, entitled "Launching for Growth," may begin about one year after the first phase is initiated and has two recommendations that rely on significant advancement of prescribed actions of the initial one. Efforts are directed toward process-driven resource management and process standardization across parks and regions for completing necessary documentation and other tasks. Furthermore, there is a concerted effort to pivot toward a Servicewide regimen to introduce metrics to be tracked, amalgamated, and evaluated to enhance transparency of program effectiveness for better resource management and communication internally and externally of mission performance.

A third phase is likely to commence about two years after the organizational transformation efforts begin. Entitled "Expanding the Reach," this phase has two recommendations for implementation. The first calls for PCRP leaders to identify and introduce flexible and scalable cultural resource management processes that are fully aligned with both the Directorate's

strategic priorities, and with the NPS's priorities. The second theme of this phase calls for greater collaboration between Directorates to serve as a force multiplier for PCRP and its partners. These efforts are focused on deriving synergies across the NPS and with external stakeholders that benefit from shared aims and sharable competencies.

The final recommendation calls for enhanced communication efforts across all three implementation phases and beyond. Successful implementation of the recommendations will facilitate PCRP's efforts to craft and disseminate a precise narrative that outlines how its performance contributes to the broad array of services within its purview, how it is able to do high priority tasks well given current resource levels and can provide compelling arguments to the value-add of its many roles and responsibilities completed with NPS and other external partners, parks, regions, and Congress. This overlay serves to tie the PCRP's actions together and offers important regular information to help its employees and others, including the public, to realize their roles in advancing the Directorate's strategic objectives.

While implementation of this report's recommendations does not require new funding, successful implementation will require meaningful and focused efforts by PCRP and Directorate leaders to organize and guide the inevitable fundamental organizational changes that are part of the roll-out. This report offers advice on how an organizational transformation is best undertaken. This report cautions that leaders should anticipate how unsettling changes of this magnitude may be for PCRP and other employees. A decision by PCRP and Directorate leaders to move forward must be accompanied by a strong additional focus on many elements of this work to include process, organization, communication, energy, and urgency.

The PCRP's leadership has an opportunity to take urgent actions to move its essential mission forward. While there may be little reason to think that a sizable infusion of financial resources is imminent, a coordinated PCRP-wide pivot toward a process and priority-driven approach to its work will advance its success and its future requests for more resources. This report calls for greater selectivity to place resources against work that has the greatest impact and urgency to enhance a connection with America's rich cultural resources for the millions of NPS visitors and the larger public.

Appendices

Appendix A: Recommendations from the 2008 Academy Report

Recommendation 1: The Panel recommends that WASO cultural resource programs continue the performance-based allocation process for adjusting project funding allocations to the regions as a means to improve program management as well as accountability. WASO needs to insist on timely and accurate reporting, seek early identification of problems, and exercise forbearance in reallocating funds when the regions miss goals for justifiable reasons, using each failure as a learning opportunity.

Recommendation 2: The Panel recommends that NPS expand use of the NPS Scorecard as a budget formulation tool, including providing increased outreach, training, and technical assistance to NPS staff at all levels.

Recommendation 3: The Panel recommends that NPS make full use of the NPS Scorecard as a management tool so that park superintendents and resource managers can track changes over time and make comparisons with similar parks by: adding additional informational measures for cultural resources and other programs; developing the capability to allow comparisons with groups of similar parks; accelerating development of benchmark standards; highlighting exemplary practices; and expanding outreach, training, and technical assistance to NPS staff at all levels.

Recommendation 4: The Panel recommends that NPS include resource stewardship (cultural and natural) as an element in all superintendents' performance evaluations, in particular with respect to park cultural resources at risk.

Recommendation 5: The Panel recommends that NPS seek sufficient travel ceiling to support skill-sharing between parks and regional offices, meet critical training needs, and facilitate cross-learning.

Recommendation 6: The Panel recommends that NPS expand the time that parks have to obligate project funds each fiscal year by applying assessments at the beginning of the year, accelerating the availability of approved funds, and streamlining contracting procedures.

Recommendation 7: The Panel recommends that NPS undertake an intensive servicewide effort (similar to the Natural Resource Challenge) to develop a comprehensive proposal, clear priorities, and sound justification to improve stewardship of park cultural resources and seek increased funding and permanent staff to reduce risks to cultural resources of national significance and meet other critical needs.

Recommendation 8: The Panel recommends that NPS significantly strengthen WASO leadership to improve stewardship of cultural resources throughout the parks by: 1) implementing the changes needed to make the current WASO organization high performing; or 2) creating a separate Associate Director for Park Cultural Resources.

Recommendation 9: The Panel recommends that NPS revise regional Corrective Action Plans for the archeology program, as needed, to consider the time and cost involved in traveling to archeological sites.

Recommendation 10: The Panel recommends that NPS accelerate efforts by WASO and field staff to develop a new performance measure for the archeology program that takes sites' significance and vulnerability into account.

Recommendation 11: The Panel recommends that NPS accelerate completion of the conversion of ASMIS to a web-based system to improve access to archeological site data and better meet the needs of archeologists in the parks and regional offices.

Recommendation 12: The Panel recommends that NPS develop an expeditious and efficient schedule to ensure that all parks reconcile differences between LCS and FMSS so that these two systems' records of historic structures (assets) coincide.

Recommendation 13: The Panel recommends that NPS develop separate performance measures for park administrative histories and historic resource studies and administer funding for these histories and studies from a single fund source.

Recommendation 14: The Panel recommends that NPS enforce current policy to avoid inappropriately adding to museums' uncataloged backlog by: deeming "incomplete" any project that produces uncataloged field collections; administering research permits to ensure that collections produced and intended for long-term preservation are cataloged; ensuring that archival records that are unrelated to resource management are not accessioned by museums; and creating regional review panels to ensure that large donations (e.g., archival collections >100 linear feet) are consistent with a sound museum management plan and scope of collection.

Recommendation 15: The Panel recommends that NPS ensure that museums follow professional archival methods by: expediting revisions to Appendix D of the Museum Handbook; appointing a fully qualified regional archivist for every region; developing and delivering training in professional archival methods for all staff involved in archiving; and providing on-site technical assistance to demonstrate the practical application of professional archival standards.

Recommendation 16: The Panel recommends that NPS use separate measures to track the backlog of archives and other museum items.

Recommendation 17: The Panel recommends that NPS make public search tools more user friendly, ensure that museum staff use the web catalog module of ANCS+, and provide training as necessary.

Recommendation 18: The Panel recommends that NPS develop a new performance measure (based on data that museums already report) to track and report the use of museum collections by park staff, researchers, and the public.

Appendix B: Panel and Study Team Member Biographies

Panel of Academy Fellows

Sallyanne Harper (Chair), President, Association for Federal Enterprise Risk Management; Vice President, Executive Office of Federal Management Practice, AOC Solutions; Chief Mission Support Officer and Chief Financial Officer, US Government Accountability Office; Chief Financial Officer/Acting Assistant Administrator for Administration and Resources Management, US Environmental Protection Agency; Deputy Assistant Administrator for Management and Administration and Deputy Chief Financial Officer, US Environmental Protection Agency; Finance Director, US Environmental Protection Agency; Associate Director, Superfund Procurement Operations, US Environmental Protection Agency; Senior Contracting Officer in major weapons systems acquisition, Naval Air Systems Command and Naval Regional Contracting Office; Adjunct Faculty, Executive Education, Brookings Institute; Board Member, Federal Accounting Standards Advisory Board.

Stephen Ayers, President, The Ayers Group, 2018, Present; Architect of the Capitol, Executive Office, Architect of the Capitol, 2010, 2018; Acting Architect of the Capitol, Executive Office, Architect of the Capitol, 2007, 2010; Deputy Architect and Chief Operating Officer, Executive Office, Architect of the Capitol, 2005, 2007; Superintendent, Library Buildings and Grounds, Architect of the Capitol, 2002, 2005; Deputy Superintendent, Senate Office Buildings, Architect of the Capitol, 1999, 2002; Assistant Superintendent, Senate Office Buildings, Architect of the Capitol, 1996, 1999; Construction Manager, European Division, Voice of America, 1992, 1996; General Engineer, Washington, DC, Voice of America, 1991, 1992; Military Officer, Civil Engineering, US Air Force, 1985, 1990.

Scott Cameron, Principal Deputy Assistant Secretary for Policy, Management and Budget, Office of the Secretary of the Interior, US Department of the Interior, 2017, 2021; President, Reduce Risks from Invasive Species Coalition, 2014, 2017; Senior Advisor, Dawson and Associates, 2016, 2017; Senior Advisor for Strategic Planning, Pathfinder Consultants LLC, 2016, 2017; Executive Advisor, R3 Government Solutions, 2015, 2017; Former Director of Strategic Development, Tuknik Government Services, 2016, 2016; Former Senior Vice President and Partner, R3 Government Solutions, 2012, 2015; Director, Global Public Sector, Grant Thornton LLP, 2006, 2012; Deputy Assistant Secretary for Performance, Accountability and Human Resources, US Department of the Interior, 2004, 2006; Deputy Assistant Secretary, Performance and Management, US Department of the Interior, 2001, 2004; Director of Government and Regulatory Affairs, CHEP International, 1999, 2001; Former Washington DC Representative, Office of the Governor of California, 1996, 1999; Deputy Chief, Interior Branch, US Office of Management and Budget, 1989, 1995; Legislative Assistant, US Senator Chic Hecht, 1985, 1989.

Dr. Beth Gazley, Professor, School of Public & Environmental Affairs, Indiana University-Bloomington, 2004, present; Senior Associate, The Parisky Group Consulting Firm, 1991, 1997; Development Officer, Office of Development and Alumni Relations, University of New Haven, 1987, 1990; Membership Services Manager, Business Executives for National Security Inc., 1985, 1987.

Dr. Janet Weiss, Mary C. Bromage Collegiate Professor of Business and Professor of Public Policy, Gerald R. Ford School of Public Policy, University of Michigan; Visiting Scholar, Trachtenberg School of Public Policy and Public Affairs, George Washington University; Visiting Professor, McCourt School of Public Policy, Georgetown University; Scholar in Residence, Performance Improvement Council, GSA; Vice Provost for Academic Affairs, University of Michigan; Dean, Rackham Graduate School, University of Michigan; Fellow, enter for Advanced Study in the Behavioral Sciences, Stanford, CA; Associate Professor, School of Organization and Management and Institution for Social and Policy Studies, Yale University.

Academy Study Team

Brenna Isman, *Director of Academy Studies*. Ms. Isman has worked at the Academy since 2008 and oversees the Academy studies, providing strategic leadership, project oversight, and subject matter expertise to the project study teams. Prior to this, Ms. Isman was a Project Director managing projects focused on organizational governance and management, strategic planning and change management. Her research engagements have included working with the National Aeronautics and Space Administration, the Environmental Protection Agency, the Social Security Administration, the Department of Veterans Affairs, as well as multiple regulatory and Inspector General offices. Prior to joining the Academy, Ms. Isman was a Senior Consultant for the Ambit Group and a Consultant with Mercer Human Resource Consulting. Ms. Isman holds a Master of Business Administration (MBA) from American University and a Bachelor of Science (BS) in Human Resource Management from the University of Delaware.

Roger Kodat, *Senior Project Director*. Mr. Kodat has led more than 35 projects for the Academy. He brings twenty years of commercial and investment banking experience with JPMorgan Chase, and six years of senior level federal government experience at the Department of the Treasury. Appointed by President George W. Bush in 2001 to serve as Deputy Assistant Secretary of Treasury, he was responsible for Federal Financial Policy. Some of his tasks at Treasury included policy formulation for the 2006 Postal Accountability and Enhancement Act; rule making and oversight of Federal loan and loan guarantee programs; and management of the Federal Financing Bank (a $32 billion bank at that time). Mr. Kodat holds a BS in Education from Northwestern University and both an MBA in Finance and Master of Arts (MA) in Political Science from Indiana University.

Sean Smooke, *Senior Research Associate*. Mr. Smooke joined the Academy as a Research Associate in August of 2019. He has served on numerous Academy projects, including work for the National Nuclear Security Administration, National Park Service, United States Secret Service, and National Marine Fisheries Service, amongst others. Mr. Smooke holds a BA from Claremont McKenna College in Government and Legal Studies.

Gillian Townsend, *Senior Research Associate*. Ms. Townsend joined the Academy in November 2019. She has served on several Academy studies, including work with the National Oceanic and Atmospheric Administration, the National Park Service, the Department of Commerce Office of Inspector General, and the National Marine Sanctuary System. Ms. Townsend holds a BA from the College of William & Mary in Government and History.

Appendix C: List of Interviewees

National Park Service

Washington Service Office

- **Joy Beasley**, Associate Director, Cultural Resources, Partnerships, and Science
- **Shawn Benge,** Deputy Director of Operations
- **Karen G. Bergsma,** Chief of Staff, Park Planning, Facilities, and Lands
- **Jessica Bowron,** NPS Comptroller
- **Kathleen Byrne**, Acting Chief Curator/Museum Registrar, Museum Management Program
- **Mike Caldwell,** Associate Director, Park Planning, Facilities, and Lands
- **Kelly Clark,** Management Assistant, Cultural Resources, Partnerships, and Science
- **Susan Dolan**, Park Cultural Landscapes Program Manager
- **Jeffrey L. Durbin**, Section 106 Compliance Program Manager
- **Jenifer Eggleston,** Chief of Staff, Cultural Resources, Partnerships, and Science
- **Barbara Little**, Program Manager, Cultural Resources Office of Interpretation and Education
- **Turkiya L. Lowe,** Supervisory Historian and Manager, Park History Program, Deputy Federal Preservation Officer
- **Jennifer Madello,** Chief, Park Facility Management
- **Tom Medema**, Associate Director, Interpretation, Education, & Volunteers
- **Rita Moss**, Associate Director, Workforce and Inclusion
- **Kristen O' Connell,** Budget Officer, NPS Cultural Resources
- **Daniel Odess,** Chief of Science & Research, NPS Cultural Resources
- **Stephanie Roulett,** Public Affairs Specialist, National Park Service
- **Ray Sauvajot,** Associate Director, Natural Resource Stewardship and Science
- **Bethany Serafine**, Management Assistant, Cultural Resources, Partnerships, and Science
- **Stephanie Stephens,** Deputy Associate Director, Park Programs and Heritage Areas
- **Jennifer Talken-Spaulding,** Bureau Cultural Anthropologist, Office of Tribal Relations & American Cultures
- **Joshua M. Torres**, Acting Program Lead for Archeology, National Park Service, Consulting Archeologist, Department of the Interior
- **Patrick Walsh**, Environmental Quality Division Manager, Natural Resource Stewardship & Science
- **Jennifer Wyse**, Chief of Staff, Natural Resource Stewardship and Science

Regional Offices

- **Bob Bryson,** Associate Regional Director, Cultural Resources, LWCF and RTCA, Interior Regions 3, 4, and 5/Midwest
- **Amy Cole**, Chief of Cultural Resources, Interior Regions 6, 7 & 8/Intermountain

- **Shaun Eyring,** Manager, Cultural Resources Division, Region 1: North Atlantic-Appalachian
- **Kirstie Haertel,** Program Manager, Regional Anthropology, Archeology, and Museums
- **David Louter,** Chief, Cultural Resources and Science Program, Interior Regions 8, 9, 10, and 12
- **Bob Page**, Director, Olmsted Center for Landscape Preservation, Interior Region 1
- **Jennifer Pederson Weinberger,** Cultural Resources Program Manager, Interior Region 11 – Alaska
- **Stephen Pisani,** Chief, Historic Architecture and Strategic Planning, (former Program Manager Historic Structures)
- **Sam Tamburro,** Cultural Resources Division Manager, National Park Service, Interior Region 1—National Capital Area
- **Ray Todd,** Director, Denver Service Center
- **Cynthia Walton,** Acting Chief, Cultural Resources, Partnerships and Science; and Branch Manager, Archeological and Historic Preservation Partnerships, National Park Service, Interior Region 2

Park Staff

- **Lauren Blacik**, Superintendent, Pipe Spring National Monument
- **Amy Bracewell,** Superintendent, Roosevelt Vanderbilt National Historic Sites
- **Tyrone Brandyburg**, Superintendent, Harpers Ferry
- **David Bitterman**, Chief, Design and Preservation Planning, Historic Architecture, Conservation, and Engineering
- **Juanita Bonnifield,** Branch Chief of Cultural Resources, SEKI
- **David Conca,** Chief Cultural Resource Management, OLYM
- **Kelly Fellner**, Superintendent, Springfield Armory National Historic Site
- **Tracy Fortmann**, Superintendent, Fort Vancouver National Historic Site
- **Laura Joss,** Superintendent, Golden Gate National Recreation Area
- **Craig Kenkel,** Superintendent, Point Reyes National Seashore
- **Laura Kirn**, Chief of Cultural Resources, CHIS
- **Jennifer Mayer**, Manager, Resources Planning, and Compliance Division
- **Jason Newman**, Superintendent, Frederick Law Olmsted National Historic Site
- **James Nyman**, Manager, Northeast Archeological Resources Program
- **Giles Parker,** Director, Northeast Museum Services Center
- **Laurel Racine**, Manager, History and Preservation Assistance
- **Thomas Ross**, Superintendent, Morristown National Historical Park
- **Doyle Sapp,** Superintendent, Richmond National Battlefield /Maggie Walker NHS
- **Robin Snyder**, Superintendent, Appomattox Courthouse National Historical Park
- **Stephen Spaulding**, Director, Historic Architecture, Conservation, and Engineering
- **Susan Trail**, Superintendent, Antietam National Battlefield
- **Gordon White,** Cultural Resources Manager, Golden Gate NRA

Advisory Council on Historic Preservation

- **Kirsten Kulis**, NPS Liaison
- **Chris Koeppel,** Assistant Director

Duke University

- **Anne Mitchell Whisnant**, Associate Professor, Duke University and Author, Imperiled Promise Report

Harvard Kennedy School

- **Linda Bilmes,** Academy Fellow, Daniel Patrick Moynihan Senior Lecturer in Public Policy and Public Finance, Harvard Kennedy School

National Academy of Public Administration

- **Tony Spearman-Leach,** Director of Development and Philanthropy

National Association of Tribal Historic Preservation Officers

- **Valerie J. Grussing,** Executive Director

National Conference of State Historic Preservation Officers

- **Erik Hein,** Executive Director
- **Ramona M. Bartos,** Administrator, State Historic Preservation Office, Deputy State Historic Preservation Officer, North Carolina
- **Alan Downer,** SHPO Administrator, Hawaii
- **Elizabeth Hughes**, Director and State Historic Preservation Officer, Maryland Historical Trust
- **Kathryn Leonard**, State Historic Preservation Officer, Arizona State Historic Preservation Office
- **Jeff Pappas,** State Historic Preservation Officer, New Mexico

National Parks Conservation Association

- **Alan Spears,** Senior Director for Cultural Resources

National Park Foundation

- **Dieter Fenkart-Froeschl,** Chief Operating Officer
- **Michelle Lane,** Vice President of Government Relations
- **Ruth Prescott,** Chief of Staff and Senior Advisor to the President/CEO

National Trust for Historic Preservation

- **Katherine Malone-France,** Chief Preservation Officer

Office of Management and Budget (OMB)

- **Michael Hildner, NPS** Examiner

Office of Personnel Management (OPM)

- **Travis McKone,** Human Resources Consultant

Parks Canada

- **Patricia Kell,** Executive Director Cultural Heritage

Smithsonian Institution

- **Nancy Bechtol,** Director, Smithsonian Facilities
- **Sharon Park,** Chief Architect and Head of Historic Renovation
- **Jason Schiavoni,** Associate Director of Communications, Smithsonian Facilities

United States Forest Service

- **Ken Sandri,** Historic Preservationist, Exhibits Specialist, and Tribal Liaison, Forest Service
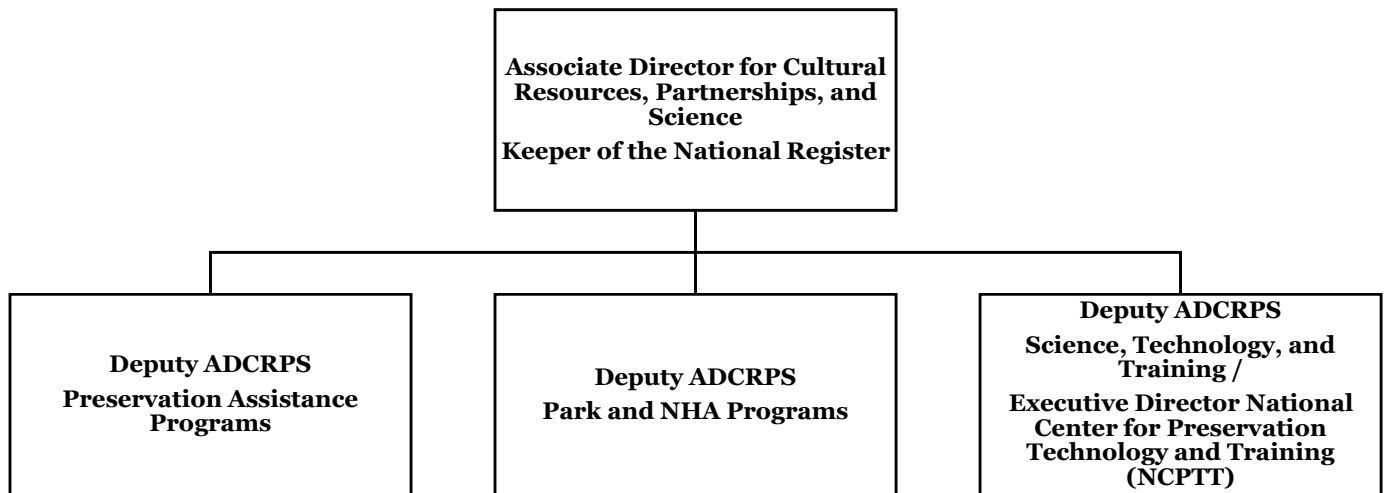
106 Group

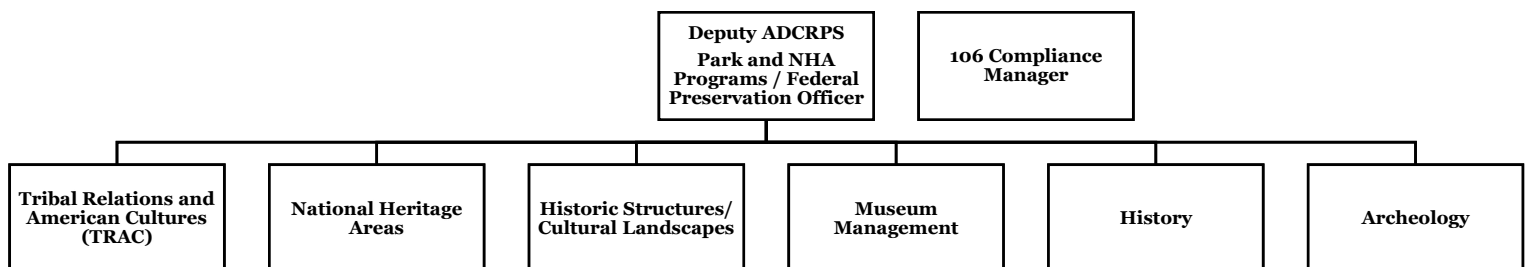- **Anne Ketz,** CEO & Services Director

Other

- **Craig Crutchfield,** Former OMB Department of the Interior Branch Chief
- **Denis Galvin**, Former Deputy Director NPS, Academy Fellow
- **Aimee Jorjani,** Former Chair, Advisory Council on Historic Preservation
- **Eleanor Mahoney,** Former NPS Mellon Humanities Postdoctoral Fellow
- **Rosie Pepito,** Retired, Superintendent
- **Stephanie Toothman**, Former Associate Director, CRPS
- **Perry Wheelock,** Former Deputy Regional Director, Cultural and Natural Resources National Capitol Regions

Appendix D: NPS and CRPS Organizational Charts

Cultural Resources, Partnerships, and Sciene Directorate Organizational Chart

```
┌─────────────────────────────────┐
│ Associate Director for Cultural │
│ Resources, Partnerships, and    │
│ Science                         │
│ Keeper of the National Register │
└─────────────────────────────────┘
```

| Deputy ADCRPS Preservation Assistance Programs | Deputy ADCRPS Park and NHA Programs | Deputy ADCRPS Science, Technology, and Training / Executive Director National Center for Preservation Technology and Training (NCPTT) |

Park and National Heritage Programs Sub- Directorate Organizational Chart

| Deputy ADCRPS Park and NHA Programs / Federal Preservation Officer | 106 Compliance Manager |

| Tribal Relations and American Cultures (TRAC) | National Heritage Areas | Historic Structures/ Cultural Landscapes | Museum Management | History | Archeology |

60

Appendix E: Overview of NPS-28 Guideline

The guideline is broken down into 10 Chapters that describe the basic principles of sound cultural resource management:

Chapter 1 – Fundamental Concepts of Cultural Resource Management: This chapter is an overview of the fundamental concepts for cultural resources management that impact the guidance throughout the rest of the document. The chapter outlines the importance of the cultural connection to people across societies and how the NPS fits within that connection, the types of cultural resources, the nature of cultural resources, the essentials of a comprehensive cultural resource management program, and an overview of program dynamics including the processes and the cycles cultural resources go through in a comprehensive management program.

Chapter 2 – Research: This chapter provides an overview of the fundamentals of cultural resource-based research including the identification, evaluation, documentation, full understanding, and inventories of resources. Research is a critical component of informed decision-making which impacts park planning and operations.

Chapter 3 – Planning: This chapter provides an overview of the fundamentals for managing cultural resources within park planning. Well-designed planning integrated cultural resources into larger park management, identifies and minimizes adverse impact on cultural resources, provides for interpretation, and identifies the most appropriate uses for cultural resources. Planning also touches on applying for funding for cultural resources needs and how to prioritize funding accordingly.

Chapter 4 – Stewardship: This chapter provides an overview of the importance of cultural resources stewardship and making decisions to ensure the preservation of cultural resources in perpetuity. Stewardship is a fundamental component of the mission of the NPS and decisions on managing resources must be made with long-range preservation goals in mind.

Chapter 5 – Compliance with Section 106 of the National Historic Preservation Act: This chapter details the activities the NPS must undertake to ensure compliance with the National Historic Preservation Act. In particular, this chapter focuses on Section 106 compliance which, "mandates that federal agencies take into account the effects of their actions on properties listed or eligible for listing in the National Register and give the Advisory Council on Historic Preservation a reasonable opportunity to comment"[59] and Section 110 compliance which directed federal agencies to "to establish preservation programs to identify, evaluate, protect, and nominate to the National Register historic properties under their ownership or control, whether they are of significance at the local, state, or national level."[60] In addition, this chapter outlines roles

---

[59] "NPS-28: Cultural Resource Management Guideline," *The National Park Service*, Accessed November 15, 2022. https://www.nps.gov/parkhistory/online_books/nps28/28intro.htm
[60] NPS-28: Cultural Resource Management Guideline," *The National Park Service*

and responsibilities within the compliance process and the NPS-wide Programmatic Agreement which gives the NPS flexibilities in the compliance process.

Chapter 6 – Management of Archeological Resources: This chapter details the importance of archeological resources, outlines program objectives, and describes how archeological resources should be incorporated into cultural resource research, planning, and stewardship as part of an effective comprehensive cultural resources program.

Chapter 7 – Management of Cultural Landscapes: This chapter details the importance of cultural landscapes, outlines program objectives, and describes how cultural landscapes should be incorporated into cultural resource research, planning, and stewardship as part of an effective comprehensive cultural resources program.

Chapter 8 – Management of Historic and Prehistoric Structures: This chapter details the importance of historic and prehistoric structures, outlines program objectives, and describes how historic and prehistoric structures should be incorporated into cultural resource research, planning, and stewardship as part of an effective comprehensive cultural resources program.

Chapter 9 – Management of Museum Objects: This chapter details the importance of museum objects, outlines program objectives, and describes how museum objects should be incorporated into cultural resource research, planning, and stewardship as part of an effective comprehensive cultural resources program.

Chapter 10 – Management of Ethnographic Resources: This chapter details the importance of ethnographic resources, outlines program objectives, and describes how ethnographic resources should be incorporated into cultural resource research, planning, and stewardship as part of an effective comprehensive cultural resources program.

In addition to these 10 Chapters, the guideline is supplemented with appendices of impacting laws and regulations, relevant process forms, and other supporting compliance materials such as the Native American Graves Protection and Repatriation Act (NAGPRA).

Appendix F: Bibliography

"About Us," The National Park Service, Accessed June 21, 2022.
https://www.nps.gov/aboutus/index.htm

"About Us, Frequently Asked Questions," National Park Service, last updated February 22,
2022. https://www.nps.gov/aboutus/faqs.htm

"About Us, National Park System", National Park Service, Accessed March 18, 2022.
https://www.nps.gov/aboutus/national-park-system.htm

Advisory Council on Historic Preservation, Programmatic Agreement Among the National Park
Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation,
the National Conference of State Historic Preservation Officers for Compliance with
Section 106 of the National Historic Preservation Act, November 14, 2008.
https://www.achp.gov/sites/default/files/programmatic_agreements/2019-
04/nw.nps_.Nationwide%20PA.14nov08.pdf

"An Introduction to Section 106." Advisory Council on Historic Preservation. Accessed June 21,
2022. https://www.achp.gov/protecting-historic-properties/section-106-
process/introduction-section-106

"Customer service in government," Deloitte, Accessed June 22, 2022.
https://www2.deloitte.com/us/en/pages/public-sector/articles/customer-service-in-
government-satisfaction.html

"Cultural Resources, Partnerships, and Science Directorate," The National Park Service,
Accessed June 21, 2022. https://www.nps.gov/orgs/1345/index.htm

"Everything You Need to Know About Centers of Excellence," Catalant, Accessed June 22, 2022.
https://gocatalant.com/coe-everything-you-need-to-know-about-centers-of-excellence

Frank Hodsoll, James Kunde, and Denis P Galvin, SAVING OUR HISTORY: A Review of
National Park Cultural Resource Programs. National Academy of Public Administration,
2008. https://napawash.org/academy-studies/saving-our-history-a-review-of-national-
park-cultural-resource-programs

"Historic Sites Act of 1935," *The National Park Service*, Accessed November 15, 2022.
https://www.nps.gov/subjects/archeology/historic-sites-act.htm

Kotter Methodology," Kotter, Accessed June 22, 2022.
https://www.kotterinc.com/what-we-do/methodology/

Narasimhan Gopalkrishnan, "Process Driven or People Drive," Kaizen Institute, last modified
March 28, 2018, https://in.kaizen.com/blog/post/2018/03/28/process-driven-or-
people-driven

National Park Service, "Legislative and Congressional Affairs, Great American Outdoors Act,"

https://www.nps.gov/subjects/legal/great-american-outdoors-act.htm, Accessed June 21, 2022.

National Park Service, The National Parks 2009 – 2011: Official Index of the National Park Service, https://www.nps.gov/parkhistory/online_books/nps/nps/part1.htm, Accessed June 21, 2022

National Park Service Cultural Resources Stewardship, Partnerships, and Science, Cultural Resources Challenge: NPS Cultural Resources Action Plan for 2016 and Beyond, 2016

"NPS-28: Cultural Resource Management Guideline," *The National Park Service*, Accessed November 15, 2022.
https://www.nps.gov/parkhistory/online_books/nps28/28intro.htm

"Overview of Sections 106 & 110 of the National Historic Preservation Act", The National Park Service, Accessed June 21, 2022. https://www.nps.gov/dscw/cr-nhpa.htm

"Process Driven Organizations," Management Study Guide, Accessed June 22, 2022.
https://www.managementstudyguide.com/process-driven-organizations.htm

The United States Department of the Interior, National Park Service, Budget Justification and Performance Information Fiscal Year 2023,
https://www.doi.gov/sites/doi.gov/files/fy2023-nps-greenbook.pdf.

What's Driving Your Organization? Personalities, People, or Processes?," the IllumiLab, last modified December 18, 2017, https://www.insightsintoimpact.com/whats-driving-organization-personalities-people-processes/

This page is intentionally left blank.

1600 K Street, NW
Suite 400
Washington, DC 20006

Phone: (202) 347-3190
Fax: (202) 821-4728
Website: www.napawash.org