



Grant Manual
for the
Vermont Certified Local
Government Program

2022 Grant Round Edition

October 2021

CONTENTS

Preface.....	1
Introduction.....	3
Grant Program Cycle.....	4
Eligible Projects.....	5
About "The Secretary's Standards"	9
Ground Disturbance at Development Projects	10
Matching Share.....	11
Allowability of Costs.....	12
Payment Procedures.....	13
Uniform Administrative Requirements.....	13
Grant Selection Criteria & Ranking System.....	14
Administrative Capabilities.....	20
Grant Application Review & Selection Process Overview.....	21
Completing the Application.....	22
Grant Agreement.....	23
Procurement Requirements.....	24
Contract Pricing.....	27
Contractor Selection Procedures.....	28
Contract Provisions.....	29
Procurement Documentation.....	31
Project Publicity.....	32
Progress Reports and Final Project Report.....	33
Financial Documentation.....	34

PREFACE

The Certified Local Government (CLG) program is designed to provide an opportunity for local governments to become more directly involved in identifying, evaluating, protecting, promoting and enhancing the educational and economic value of historic resources at the local level. Created in 1980 through amendments to the National Historic Preservation Act, the CLG program requires that each State Historic Preservation Office (SHPO) designate at least 10 percent of its annual Historic Preservation Fund allocation from the Department of the Interior to Certified Local Government communities. In Vermont, the SHPO is the Vermont Division for Historic Preservation (VDHP), located in the Department of Housing and Community Development, in the Agency of Commerce and Community Development.

A local government wishing to become a CLG must fulfill certain requirements indicating its commitment to local preservation. One requirement is the establishment of a local Historic Preservation Review commission. The local government appoints to the commission professional and lay members with varied expertise and interest related to historic preservation. As the advisory body to the legislative body and planning commission, the historic preservation commission becomes the coordinating body for community preservation activities. It prepares reports on National Register eligible properties, sponsors public information programs on historic preservation, and prepares applications for CLG grants, if the community chooses to apply for grant funds. VDHP provides training for the CLG commission on their CLG responsibilities and preservation topics in general.

The matching grants available Certified Local Government communities can be used to fund local preservation activities such as surveys of historic resources, National Register nominations, preservation planning and educational projects. Grants are also available for architectural plans and specifications, engineering reports, feasibility and streetscape studies, and in some years, for "bricks and mortar" rehabilitation work on National Register-listed properties.

Three important documents govern the implementation and management of the CLG program. CLG coordinators and commissioners should familiarize themselves with the following documents:

- 1) The National Park Service's [Historic Preservation Fund Manual](#) is VDHP's primary "go to" guide for administering federal sub-grants to CLG communities. CLG Coordinators should be familiar with *Chapter 8: Subgrants, Contracts, and Third-Party Agreements*, as well as *Chapter 9: Certified Local Governments*.
- 2) VDHP's [Rule 3: Regulations for the Vermont Certified Local Government Program](#) describes the Vermont program in detail.
- 3) The [Vermont Certified Local Government Program Grant Manual](#) (this document) explains how to apply for and manage a CLG grant.

For more information, please contact:

Devin Colman, State Architectural Historian
(802) 585-8246
devin.colman@vermont.gov

Vermont Division for Historic Preservation
One National Life Drive
Deane C. Davis Building, Floor 6
Montpelier, Vermont 05620-0501
<http://acd.vermont.gov/historic-preservation>

INTRODUCTION

Please review this manual carefully before completing the grant application. Submission of an application for a grant constitutes a declaration that the applicant is familiar with the terms of the grant program and the procedures set forth in this handbook. In addition, Certified Local Government grantees must adhere to [Rule 3: Regulations for the Vermont Certified Local Government Program](#).

If your project is selected, you will refer to this manual throughout the course of the project.

This manual contains the most recent requirements and policies as set forth by the National Park Service, Department of the Interior, the federal grantor agency. It is complete as of the date of publication, but because requirements and policies change, the Vermont Division for Historic Preservation (VDHP) does not accept responsibility for any such changes which are not incorporated into this handbook. VDHP will notify grant applicants and sub-grantees of any changes which may affect their project.

2022 GRANT PROGRAM CYCLE

Because CLG grants are funded by the National Park Service, the program cycle follows the federal fiscal year (October 1 – September 30). CLG grants are awarded annually, and each CLG grant has a two-year period within which to complete the project.

- October 1, 2021:** Start of federal fiscal year 2021.
- October 4, 2021:** VDHP notifies all CLG communities of the availability of CLG grant funding and provides the grant application materials.
- December 6, 2021:** CLG grant applications and all supporting materials must be submitted to VDHP by 4:30 PM.
- January 2022:** VDHP staff review and score each grant application. All applications are then presented to the Vermont Advisory Council on Historic Preservation (VACHP) with staff recommendations for funding. After review and discussion, VACHP awards funding. VDHP notifies each applicant of the results of the VACHP application review.
- February 2022:** Preparation and execution of Grant Agreement between sub-recipient and VDHP.
- March 2022:** Commence work on the project.
- September 30, 2022:** End of federal fiscal year 2021
- October 1, 2022:** Start of federal fiscal year 2022
- December 1, 2022:** Initial progress report must be submitted to VDHP.
- April 1, 2023:** Second progress report must be submitted to VDHP.
- August 1, 2023:** Deadline to complete the project. Sub-recipient completes final budget form, documents proof of payment and local match, and writes final project report. Submit all of these materials to VDHP with the request for reimbursement.
- August – September 2023:** VDHP staff review and approve requests for reimbursement.
- September 30, 2022:** End of federal fiscal year 2022. All 2020 CLG grant projects must be completed, paid and closed out by this date. Extensions beyond this date are not possible.

ELIGIBLE CLG GRANT PROJECTS

There are six broad project categories within which a CLG may apply for grant funding:

Priority I Projects:

- Survey
- National Register
- Preservation Planning
- Information and Education
- Pre-Development

Priority II Projects:

- Development

A CLG Community may apply for multiple projects in the same year, but a separate application form is required for each project. For example, one application should be submitted for a Survey project to update the local Historic Sites and Structures Survey, and a second application should be submitted for an Information and Education project to attend a conference or training workshop.

The appropriate Secretary of the Interior's Standards for [Preservation Planning](#), [Identification](#), [Evaluation](#) and [Registration](#) apply to all CLG grant projects. All National Register nomination projects must utilize [NR Bulletin 15: How to Apply the National Register Criteria for Evaluation](#) and follow the guidance of [NR Bulletin 16A: How to Complete the National Register Registration Form](#). For most Pre-Development and Development projects, the [Secretary of the Interior's Standards for Rehabilitation](#) will be appropriate.

All grant projects must include a public information component about the purpose of the project and the value of historic preservation to the local community.

Priority I Projects

SURVEY projects must conform to the Vermont Historic Sites and Structures Survey or Vermont Archaeological Inventory, as appropriate. The survey identifies those buildings, structures, sites, complexes and districts that are significant in Vermont's history. Depending upon the extent of survey required in the community, it may be advisable to phase the survey over more than one year. For assistance in designing a survey project, the applicant should contact the VDHP in advance of preparing the grant application. Survey projects are eligible for 60% CLG grant funding with a 40% local match (cash and/or in-kind).

NATIONAL REGISTER projects, to be most cost-effective, should be for historic districts and/or multiple property nominations identified by the CLG commission, along with the VDHP, as being eligible for the National Register of Historic Places. A "historic district" possesses a significant

concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. A “multiple property listing” is a cover document that serves as the basis for evaluating the National Register eligibility of related properties. Individual properties can also be nominated. The National Register program director at the VDHP can assist in designing these projects. National Register projects are eligible for 60% CLG grant funding with a 40% local match (cash and/or in-kind).

PRESERVATION PLANNING must be in cooperation with the [Vermont Historic Preservation Plan](#), the statewide preservation planning process. The current plan was published in early 2016. Through the survey and National Register process, and applying the information from the Plan’s themes, a community can identify and evaluate its significant properties and establish goals and priorities for their continued use and protection. This information should be integrated into the community's land planning documents and conservation efforts. The VDHP can assist any applicant with a planning project. Preservation Planning projects are eligible for 60% CLG grant funding with a 40% local match (cash and/or in-kind).

INFORMATION AND EDUCATION projects inform the general public about the value of historic preservation. Every CLG grant project must contain a public information and education component. But a CLG may apply for a grant to do ONLY a public information and education project. This is an excellent way to publicize the workings of the CLG commission. The CLG can sponsor programs, brochures or a newspaper series. For instance, special events in May for Preservation Month or in September for Vermont Archaeology Month, can be eligible for funding. Training CLG commission members and staff of the municipality working with the commission are eligible for funding. Contact the VDHP for clarification on allowable costs. Information and Education projects are eligible for 60% CLG grant funding with a 40% local match (cash and/or in-kind).

PRE-DEVELOPMENT projects plan for the work necessary to carry out construction work. Architectural plans and specifications, historic structures reports, engineering studies, archaeological testing and feasibility studies are types of pre-development work. (A historic structures report analyzes the property, establishes preservation priorities and a schedule to accomplish them).

To be eligible to apply for a CLG grant for a pre-development project, the project must be for a property - or properties - listed in the National Register of Historic Places or determined eligible by the Vermont Advisory Council on Historic Preservation, and will be nominated before or as part of the pre-development project. The project work must provide information necessary to carry out a development project that will meet "The Secretary's Standards for the Treatment of Historic Properties." (The Standards follow the next section on "Development Projects"). The level of information produced by the proposed pre-development project should be determined by the needs of the property. Nevertheless, the products produced by the pre-development grant project must clearly be consistent with the Standards.

Pre-development projects will be funded on a 50/50 matching basis, or up to 60% if enough CLG funds are available.

Priority II Projects

Funding is awarded to Priority II projects *only* after all eligible Priority I projects have been funded and if there is still grant money available to award.

DEVELOPMENT projects are actual "bricks and mortar" construction work. To be eligible to apply for a CLG grant for a development project:

1. The project must be for a property that is listed in the National Register.
2. The property must be owned by the municipality.
3. The property must be open to the public.
4. The property must be accessible to the handicapped.
5. The project must conform to local and regional plans.
6. The project work must be for stabilization or restoration work which contributes to preserving the historic qualities and architectural features of the property which make it eligible for the National Register. New additions, code improvements, utility systems work, and most routine maintenance are ineligible for funding.
7. The project work must meet "The Secretary of the Interior's Standards for the Treatment of Historic Properties." (See the following section on the Standards).
8. Most development project work will require architectural plans and specifications. While these materials are not required to be submitted with the grant application, if available they should be submitted with the application to assist the VDHP and Council in reviewing the proposed project. The cost of architectural plans and specifications and on-site architectural supervision is an allowable cost for a development grant project and should be included in the budget on the application. However, costs incurred by the CLG prior to the award of the grant cannot be included in the grant project budget.
9. The CLG, in its Grant Agreement with the VDHP for a development project grant, will agree to "...assume the cost of continued maintenance and repair of the property so as to preserve the architectural, historical, or archaeological integrity of the property for 5 years in order to protect those qualities that made the property eligible for listing in the National Register of Historic Places. Nothing in this agreement shall prohibit the subgrantee from seeking financial assistance from any source (including Historic

Preservation Fund development grants) available to it." Development projects will be funded on a 50/50 matching basis, or up to 60% if CLG funds are available.

ABOUT THE SECRETARY OF THE INTERIOR'S STANDARDS

The [Secretary of the Interior's Standards for the Treatment of Historic Properties](#) (a.k.a. "The Standards") are a series of concepts about maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The [Guidelines for Treatment of Historic Properties](#) offer general design and technical recommendations to assist in applying the Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historic property.

The Standards and Guidelines can be applied to historic properties of all types, materials, construction, sizes, and use. They include both the exterior and the interior and extend to a property's landscape features, site, environment, as well as related new construction.

Federal agencies use the Standards and Guidelines in carrying out their historic preservation responsibilities. State and local officials use them in reviewing both Federal and nonfederal rehabilitation proposals. Historic district and planning commissions across the country use the Standards and Guidelines to guide their design review processes.

The Standards offer four distinct approaches to the treatment of historic properties:

1. [Preservation](#)
2. [Rehabilitation](#)
3. [Restoration](#), and
4. [Reconstruction](#)

The Standards for the Treatment of Historic Properties are regulatory for all grant-in-aid projects assisted through the national Historic Preservation Fund. As such, all projects utilizing CLG grant funding must meet the Standards.

The [Standards for Rehabilitation](#), codified in 36 CFR 67, are regulatory for the review of rehabilitation work in the [Historic Preservation Tax Incentives program](#).

The Guidelines are advisory, not regulatory. The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

GROUND DISTURBANCE AT DEVELOPMENT PROJECTS

Archaeological resources that lie in the ground surrounding a historic building may yield important information about the history of the building or about the pre-contact use of the land. For example, an old well will often contain items that indicate the use of the building or the economic status of the occupants. A pre-contact Native American site indicating how past people lived in the area may lie adjacent to a town hall. Any ground disturbing project has the potential for disturbing or destroying archaeological resources. Foundation, drainage and porch repairs or replacement are all examples of the kinds of projects that can impact archaeological resources.

The VDHP will review all grant applications to determine if a proposal in a particular project location has the potential for impacting historic or pre-contact archaeological resources. In many cases, the existence of an archaeological site is not known but it can be reasonably predicted to exist. If the applicant or the VDHP are concerned about the possibility of disturbance of archaeological resources, the VDHP will work with the applicant to find a cost-efficient solution that both preserves the archaeological resource and allows the project to proceed. The VDHP may test a site to determine the existence of archaeological resources. The VDHP will provide this service at no cost to the CLG. In some instances, the VDHP may determine that the CLG will need to hire a qualified consultant for an archaeological assessment. This cost can be included in the development project budget and is eligible for reimbursement along with other approved project costs. Many times, an archaeological assessment reveals important and interesting information about the property that can be used for public education purposes.

MATCHING SHARE

Priority I CLG grants are awarded at a 60% federal / 40% local match ratio, and Priority II CLG grants are awarded at a 50% federal / 50% local match ratio. All grant funds are paid on a reimbursement basis at the successful completion of the project.

“Matching share” refers to the applicant's contribution toward the total cost of the project. The matching share can be cash, donated or in-kind services, or a combination of the three.

Cash match consists of actual funds committed to the project by the applicant. These matching funds can be state or local funds, grants, or fund-raising proceeds from private organizations, foundations, or individuals. Federal funds cannot be used as matching share except for Community Development Block Grant (CDBG) money.

Donated services and equipment are allowable as matching share when they directly benefit the project's objectives and are specifically identifiable. They are allowable only if the applicant would otherwise have to purchase them to accomplish the project. Donated services and equipment must be identifiable in project records as not donated by the federal government, not purchased with federal funds, and not included as donations comprising all or part of the share under any other federally assisted project.

Volunteers can contribute to the success of a project if they are organized and supervised. Just as with donated services and equipment, volunteer services are allowable as matching share if the grantee would otherwise have to purchase the services to accomplish the project. The hourly rates must be consistent with those paid for similar work in the local labor market. In most cases, the value of time donated by volunteers performing work for which they are not trained or experienced can be calculated using the 2020 [Independent Sector](#) estimates for Vermont. It is presently **\$26.85/hour** for Vermont. Volunteer hours must be documented like donated services, using blank forms that can be downloaded from the VDHP website. Volunteer services usually are not part of pre-development or development projects. Please consult with the VDHP if planning to use volunteer services for a CLG grant project.

All personnel expenses must be supported by time records that are signed by both the employee and the employee's supervisor. Such records must show the actual hours worked - by date - and the specific duties performed. Donated equipment and office space are often too difficult to document adequately to use as matching share. Equipment or office space donated to the project must not exceed the fair market rental value. Grant recipients must submit documentation of their basis for determining valuation of donated equipment and space, including proof of fair market value, with the grant application. Grant recipients must also maintain records to support their reimbursement claims as to the actual use of donated equipment. Please refer to the section on Financial Documentation further in this manual.

ALLOWABILITY OF COSTS

All costs must directly relate to the accomplishment of the approved project. In general, the types of costs which are allowable include: accounting/auditing, advertising for consultants, communications such as telephone and postage, project consultants' fees, materials and supplies consumed by the project, mileage, personnel costs (including wages and fringe benefits), printing and reproduction. Any other costs are unallowable, unless specifically approved in writing by the VDHP. The budget in the Grant Agreement for the grant will list the approved costs. **All project costs must be incurred through proper Procurement Requirements described further in this manual).**

PAYMENT PROCEDURES

Payments to the grant recipient will be made according to the payment schedule in the Grant Agreement. In general, grant payments are made on a reimbursement basis only. The final payment, which is generally no less than 25% of the grant, is not made until the Final Project Report is approved by the VDHP. The VDHP will provide the grant recipient with instructions for documenting project costs, which must meet federal standards and pass audit.

UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

CLG grantees must comply with the Office of Management and Budget (OMB) [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#). The CLG must make certain that a copy of its most recent audit is sent to VDHP as part of the CLG grant application.

GRANT SELECTION CRITERIA & RANKING SYSTEM

The basic grant award criteria are contained in Section 3.4.5 of the "Regulations for the Vermont Certified Local Government Program." The criteria were developed to promote those activities which most directly preserve Vermont's buildings, structures, sites and districts of historic, architectural and archaeological significance.

The application must also be consistent with the State Historic Preservation Plan as described in the following section. The Advisory Council on Historic Preservation has developed separate **Selection Criteria** for reviewing Priority I and Priority II applications, described in the following pages.

Consistency with the State Historic Preservation Plan

The 2016-2021 Vermont Historic Preservation Plan provides a vision for the preservation, rehabilitation and use, management, promotion, and interpretation of the state's historic resources. The plan provides guidance for planning and decision-making by anyone — individuals, organizations, agencies — in Vermont who affects these resources. The plan's vision, goals, and actions suggest direction for the DHP and its many partners, to work individually or collectively, to keep Vermont's unique character and ensure the vitality of its communities. The State Plan can be accessed at: <http://acd.vermont.gov/historic-preservation/planning/state-plan>

As part of its statewide preservation planning process, the VDHP has determined that public information and participation is the key to successful local preservation activities. The logical progression for a community to identify, evaluate and protect its resources is to survey its historic resources, identify those eligible for local designation, and develop a preservation plan and/or incorporate planning for the protecting these resources into the municipal plan. The preservation plan may include protection strategies such as local historic district or design control ordinances. Public information and education must be a part of any CLG grant project.

If a community's Historic Sites and Structures Survey is incomplete or outdated, the first step is to conduct a survey to provide the municipality with an inventory of its historic resources. The VDHP will assist the CLG in determining the level of survey needed if it is not complete. In some instances, the VDHP will recommend phasing a survey over two or more seasons if resources are not available to complete it in one season.

Communities with completed surveys should, in general, nominate properties to the National Register of Historic Places which have been identified through the survey process, as being potentially eligible for the Register. The CLG commission assists in identifying National Register-eligible properties. Due to the limitation of funds available, nominations of historic districts or multiple properties are encouraged over those for individual properties. Once the survey is complete and districts and/or multiple properties (those related by a common theme or property type) have been identified as eligible for nomination to the National Register, a

community should proceed to nominate those properties and develop a preservation plan. The plan should address the protection of its properties of historic, architectural and archaeological significance. The Vermont Historic Preservation Plan, the statewide preservation planning process, will assist the community in planning for its own historic resources.

Occasionally, the progression from survey to National Register to preservation plan may not be the most practical way for a community to identify, evaluate and protect its historic resources. The VDHP recognizes that certain factors such as an immediate threat to an area within the community, or to a certain type of historic resource, may determine that a preservation plan or National Register nomination is advisable even if the survey has not been completed.

Nonetheless, the community will be asked to describe its reasons for applying for funding for an activity that is not in the recommended sequence, and demonstrate that the project will significantly contribute toward the community's ability to identify, evaluate and protect its historic and archaeological resources.

The VDHP acknowledges that establishing a comprehensive survey, evaluation, registration and protection program is not realistic in the early stages of a community being a CLG. Archaeological resources require special planning, consideration and education efforts. The VDHP is actively working to develop realistic policies and tools for assisting communities in identifying and preserving its archaeological resources. As new information becomes available, the VDHP will present it to each CLG community. The VDHP encourages CLGs to begin developing long-term plans to inventory and protect archaeological sites, both pre-contact and historic.

Eligible sites should be locally designated and/or nominated to the National Register. The CLG should adopt appropriate preservation methods such as fee-simple purchase, easements, and acquisition of development rights, and integrate them into other land planning and conservation efforts.

In any activity of the CLG commission, public information and education is an essential part. By providing information on historic preservation to the public, the CLG can stimulate an appreciation of the importance of local heritage. This can be accomplished through public meetings, walking tours, fairs, a series of newspaper articles, websites, printed materials assembled and distributed by the commission and videos. The VDHP can provide technical assistance in planning for public awareness programs. The CLG may apply for grant funds for public information and education projects alone if that is the community's preservation priority.

Grant Selection Criteria

Each application will be scored according to the following rating system. While it is the intent to distribute funds to the maximum number of CLGs possible, funds will not be awarded to projects which do not meet the program goals and administrative requirements of the CLG grant program. The rating system will also prioritize projects if funds requested exceed the amount available. Every attempt will be made to award the amount of funds necessary to accomplish individual project goals.

Top priority in the selection of projects and award of grant funds will be given to the **Priority I** projects. If the Vermont Advisory Council on Historic Preservation is unable to award all of the available CLG funds to Priority I projects, it will next consider **Priority II** projects. A CLG may apply for more than one grant or for a grant in more than one Priority category, if it has the matching share and administrative capabilities to complete more than one project should they be selected.

SELECTION CRITERIA for Priority I Projects

_____ 1. Type of project (applicant will identify project as one of the following:
(9 points max. this section)

- For a **SURVEY** project, there is no survey or the survey has not been completed.
- For a **NATIONAL REGISTER** project, the degree to which the survey is complete, or resources are being surveyed through the National Register process.
- For a **PRESERVATION PLANNING** project, the degree to which the survey is complete and eligible historic districts have been nominated to the National Register of Historic Places.
- For an **INFORMATION AND EDUCATION** project, the degree to which the survey is complete, eligible historic districts have been nominated to the National Register of Historic Places, and a plan is in place for the protection of historic resources.
- For a **PRE-DEVELOPMENT** project, the degree to which the survey is complete, eligible historic districts have been nominated to the National Register of Historic Places, and the project coordinates with or implements plans for the protection of historic resources.

_____ 2. The project will have a significant and long-lasting impact on historic resources.
(5 points max.)

_____ 3. The project scope, staffing, budget and schedule are sufficient to achieve the projects goals and produce useful products. (5 points max.)

_____ 4. The project will have a beneficial impact on a Designated Downtown or Village Center, pursuant to section 2794 of the Downtown Development Act of 1998. (2 points max.)

5. The project's local match is:

_____ a. 40% of total project cost.
(0 points)

_____ b. 41-50% of total project cost.
(1 point)

_____ c. Over 50 % of total project cost.
(2 points)

6. The project's local match consists of:

_____ a. 0-25% cash.

(0 points)

_____ b. 26-50% cash.

(1 point)

_____ c. Over 50% cash.

(2 points)

_____ TOTAL POINTS

(25 points)

SELECTION CRITERIA for Priority II Projects

Points:

_____ 1. The project will preserve the historic qualities and architectural features of the property that makes it eligible for the National Register of Historic Places. (1 to 2 points)

_____ 2. The project will contribute to promoting the best long-term use of the property. (1 to 2 points)

_____ 3. The project will contribute to promoting the long-term preservation of the property. (1 to 2 points)

_____ 4. The scope of work, budget and schedule are sufficient to achieve the project's goal and product tangible results. (1 to 2 points)

_____ 5. The applicant has financial and program management skills that will be available for the project. (1 to 2 points)

_____ 6. The applicant's matching share exceeds 40% of the total project cost. (1 to 2 points)

_____ 7. The project provides an opportunity to develop preservation solutions to common conservation problems. (1 to 2 points)

_____ TOTAL POINTS

Administrative Capabilities

The VDHP acknowledges that federal reporting requirements passed on to grant recipients are often burdensome. Nonetheless, they are necessary for receipt of funds and the VDHP's continued eligibility for annual Historic Preservation Fund appropriations.

Therefore, the qualifications and abilities of the applicant to meet federal and state fiscal and program management requirements will be considered. While it is not necessary for the CLG's project manager to have experience in administering federal grants, he or she should have demonstrated administrative capabilities and be assigned a reasonable amount of time to the project, through its completion and acceptance by the VDHP. The project manager must be available during regular business hours, though of course, not forty hours per week. The inability to manage a previous grant from the VDHP or unresolved audit questions may be justification for rejecting the application.

GRANT APPLICATION REVIEW AND SELECTION PROCESS OVERVIEW

1. VDHP reviews annual goals and priorities established in the preservation planning process, and drafts funding priorities and selection criteria for grant program.
2. Vermont Advisory Council on Historic Preservation (VACHP) reviews priorities and selection criteria. (This step may be excluded if criteria do not change from previous grant cycle).
3. VDHP prepares grant application materials.
4. VDHP prepares and releases public notice of availability of grant funds to press, local governments with potential interest in the CLG program in the previous year, and all CLGs. All CLGs receive full application materials.
5. VDHP receives all applications.
6. VDHP reviews all applications for allowability and reasonableness of costs.
7. Applications are reviewed by the VDHP staff evaluation committee and are scored according to the selection criteria in the grant application materials. Budgets are reviewed for reasonability of costs.
8. Simultaneously, applications are reviewed individually by the VACHP. The VACHP may independently score the projects score after discussion at their meeting.
9. VACHP awards funding to eligible project applications.
10. VDHP sends notice to all applicants informing them whether their project has been selected and listing the selected projects and their grant awards.
11. VDHP reviews requirements with each CLG and drafts Grant Agreement.
12. VDHP completes Grant Agreement, forwards it to grantee for official signature. Project begins.

COMPLETING THE APPLICATION

The grant application is the basis for the decision-making process in allocating grant funds. Therefore, it is important that each question be answered completely, and that the proposal is presented clearly. For the most part, the information requested on the application is self-explanatory. Please refer to the Selection Criteria for the appropriate category of project to aid in providing information that will be used to score the project. **Only one project may be included on a single application, though applicants may apply for more than one project by submitting multiple applications.**

Because the source of the CLG grant funds is federal, compliance with federal regulations, especially the [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#), is required. The VDHP's approval of a grant application is subject to National Park Service approval. It is the VDHP's intent to make applicants aware of these conditions before they submit a grant application.

Section 1. Enter the name of the CLG community, the name of the local CLG program coordinator, and telephone, mailing address and email address for the local CLG Program Coordinator. Please also include the name and contact information for the municipal treasurer. Enter the name of the project and indicate whether the project will be administered by a designated third-party. If so, enter the name of the designated third-party organization.

Section 2. Check the appropriate project category: Survey, National Register, Preservation Planning, Information & Education, Pre-Development, or Development.

Section 3. Briefly summarize the proposed project. It is important to be thorough and to pay close attention to the Selection Criteria when completing this section. For Priority I projects in a municipality with a Designated Downtown or Village Center, describe the impact the project will have on the Designated Downtown or Village Center.

Section 4.

1. Explain how the public will be notified of the project and involved in the project.
2. Explain how the impact of the project will have significant and long-lasting effects on the community.
3. Enter a timeline for meeting project benchmarks and deadlines.
4. Identify who will work on the project and the role of each participant.

Section 5. Enter the start and end dates for the CLG community's fiscal year.

Section 6. The application must be signed by the person submitting the application, the Chair of the CLG Commission, and the Chief Elected Official (or designee). **Applications lacking any of these three signatures at the time of submittal will be deemed incomplete and returned.**

Each application must include a Proposed Budget Form indicating the total project cost, including all cash costs, donated and volunteer services. Fill in the applicable lines with appropriate amounts, rounded off to the nearest dollar. Include the rates for fringe benefits if personnel receive them.

GRANT AGREEMENT

The Grant Agreement will be prepared and executed by the VDHP after the grant has been awarded and the terms of the Agreement discussed by the CLG coordinator and VDHP staff. This is essentially a contract between the CLG and the VDHP that provides for the work to be performed as specified in the Agreement, and that the CLG will abide by the stated requirements of the grant program. In return, the VDHP will make payments to the CLG in accordance with the payment provisions in the agreement.

PROCUREMENT REQUIREMENTS

As stated in the [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#), when public funds (including CLG grants) are involved in a project, all procurement or purchasing transactions, regardless of whether competitive proposals or sealed bids, and without regard to dollar value, should be conducted in a manner that provides open and free competition. All project costs, including the matching share, must meet procurement requirements. Procurement procedures shall not restrict or eliminate competition. Non-competitive practices between firms and organizational conflicts of interest are not allowable.

The procurement regulations described in this section must be strictly followed. Any procurement (purchase) of services or goods must be performed according to the following regulations. If the CLG or its subcontractor(s) do not hire, contract or purchase according to these regulations, no grant funds can be paid to the project. Documenting purchase procedures is one of the required activities of the Grant Agreement.

Please read this entire section, particularly "Procurement Documentation."

Procurement must be made by one of the following methods:

1. Small purchase procedures.
2. Competitive sealed bids (formal advertising).
3. Competitive negotiation.
4. Non-competitive proposal.

In most instances, **grantees will use competitive negotiation or small purchase procedures.**

- 1. Small Purchase Procedures** are those relatively simple and informal procurement methods that are sound and appropriate for a procurement of services, supplies or other property, costing in the aggregate LESS than \$25,000. This method of procurement cannot be used for any procurement costing more than \$25,000. If the procurement **costs under \$25,000, prices or rate quotations shall be obtained from at least three qualified sources and the lowest priced source shall be chosen.**
- 2. Competitive Sealed Bids** (formal advertising) are generally only used for construction projects. Sealed bids are publicly solicited, and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is lowest in price. This method of procurement is used for development projects.

- a. In order for formal advertising to be feasible, appropriate conditions must be present, including, as a minimum, the following:
 - 1. A complete, adequate and realistic specification or purchase description is available.
 - 2. Two or more responsible suppliers are willing and able to compete effectively for the grantee's business.
 - 3. The procurement lends itself to a firm-fixed-price contract, and selection of the successful bidder can appropriately be made principally on the basis of price.

- b. When formal advertising is used for procurement under a grant, the following requirements shall apply:
 - 1. A sufficient time prior to the date set for opening of bids (20-30 calendar days), bids shall be solicited from an adequate number of known suppliers. In addition, invitations must be publicly advertised.
 - 2. The invitation for bids, including specifications and pertinent attachments, shall clearly define the items or services needed in order for the bidders to properly respond to the invitation.
 - 3. All bids shall be opened publicly at the time and place stated in the invitation for bids.
 - 4. A firm-fixed-price contract award shall be made by written notice to that responsible bidder whose bid, conforming to the invitation for bids, is lowest. Where specified in the bidding documents, factors such as discounts, transportation costs and life cycle costs shall be considered in determining which bid is lowest.
 - 5. Any or all bids may be rejected when there are sound and documented business reasons in the best interest of the program.

3. Competitive Negotiation, proposals are requested from a number of sources from a written Request for Proposal which is mailed to a field of candidates and after publicized, if the contract amount is expected to exceed \$25,000 or if it is the municipality's practice to publicize all RFP's or if the municipality believes it will elicit more favorable responses. Negotiations are normally conducted with more than one of the sources submitting offers, and either a fixed-price or cost reimbursable type contract is awarded, as appropriate. Competitive negotiation may be used if conditions

are not appropriate for the use of formal advertising. It is generally the method used to hire consultants for CLG grant projects. If competitive negotiation is used for procurement under a grant, the following requirements shall apply:

- a. Proposals shall be solicited from an adequate number of qualified sources to permit reasonable competition consistent with the nature and requirements of the procurement. The Request for Proposal may be publicized and reasonable requests by other sources to compete shall be honored to the maximum extent practicable. In general, 30 days are allowed for responses to the RFP.
- b. The Request for Proposal shall identify all significant evaluation factors, including price or cost where required and their relative importance.
- c. Award may be made to proposal which will be most advantageous to the procuring party, price and other factors-such as the capabilities, skill and technical knowledge required to complete the project-considered. The most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. Unsuccessful offerors should be notified promptly.

If requested, the VDHP will provide guidance to the grantee in preparing and reviewing the Request for Proposals.

4. **Noncompetitive Proposals** *must always be approved in advance by the VDHP*, which must request approval from the National Park Service. It is difficult to justify noncompetitive procurement using public funds and is rarely approved for this grant program. Noncompetitive procurement is solicitation of a proposal from only one source, or after solicitation from a number of sources, competition is determined inadequate. Noncompetitive proposals may be approved when the award of a contract is unfeasible under small purchase, competitive bidding (formal advertising) or competitive negotiation procedures. A contractor's past performance or association with the CLG on one of its projects, or the recitation of an administratively imposed deadline is insufficient reason to justify noncompetitive procurement.

CONTRACT PRICING

The cost-plus-a-percentage-of-cost and percentage-of-construction-cost method of contracting or purchasing shall not be used under any circumstances including costs connected with any contract modifications. The types of contracts which are allowable include cost reimbursement contracts, firm-fixed-price contracts, fixed-price incentive contracts, or cost-plus-a-fixed-fee contracts.

CONTRACTOR SELECTION PROCEDURES

Solicitation of offers, whether by competitive sealed bids or competitive negotiation, shall:

1. Incorporate a clear and accurate description of the technical requirements for the materials, product or service to be procured. Such description should not, in competitive procurement, contain features, which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product, or service to be procured and when necessary, shall set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use.

When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equal" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offerors shall be clearly stated.

2. Clearly set forth all requirements which offerors must fulfill and all other factors to be used in evaluating bids or proposals, such as a deadline for completion of project work. Awards shall be made only to responsible contractors who possess the potential ability to perform successfully under the terms and conditions of a proposed procurement. Consideration shall be given to such matters as contractor integrity, record of past performance, and financial and technical resources. Unreasonable requirements in order for a firm to qualify to do business and unnecessary experience and bonding requirements shall not be allowed. The rate paid to consultants cannot exceed the maximum daily rate of compensation in the Federal Civil Service equal to 120 percent of a GS-15, step 10 salary. As of January 2016, this amount is \$87.74.

CONTRACT PROVISIONS

The following provisions must be included in contracts for project work:

1. Contracts other than small purchases shall contain provisions or conditions which will allow for administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanction and penalties as may be appropriate.
2. All contracts in excess of \$10,000 shall contain suitable provisions for termination by the sub-grantee, including the manner by which it will be effected and the basis for settlement. In addition, such contracts shall describe conditions under which the contract may be terminated for default as well as conditions where the contract may be terminated because of circumstances beyond the control of the contractor.
3. All contracts awarded in excess of \$10,000 shall contain a provision requiring compliance with Executive Order 11246, entitled "Equal Employment Opportunity," as amended by Executive Order 11375, and as supplemented in Department of Labor regulations (41 C.F.R. Part 60).
4. Notice of awarding agency requirements and regulations pertaining to reporting.
5. Notice of National Park Service requirements and regulations pertaining to patent rights with respect to any discovery or invention which arises or is developed in the course of or under such contract, and of NPS requirements and regulations pertaining to copyrights and rights in data.
6. Access by the VDHP, the subgrantee, the National Park Service, the Comptroller General of the United States, or any of their duly authorized representatives to any books, documents, papers, and records of the contractor which are directly pertinent to that specific contract for the purpose of making audit, examination, excerpts, and transcriptions.
7. Retention of all required records for three years after grantees or subgrantees make final payments and all other pending matters are closed. If an audit, litigation, or other action involving the records is started before the end of the 3-year period, the records must be retained until all issues arising out of the action are resolved or until the end of the 3-year period, whichever is later.
8. Contracts shall recognize mandatory standards and policies relating to energy efficiency which are contained in the State energy conservation plan issued in compliance with the Energy Policy and Conservation Act (P.L. 94-165).

The National Historic Preservation Act does not require compliance with the Davis-Bacon Act (40 U.S.C. 276a to a-7). However, this does not exempt projects where other federal funds are involved and it is the CLG's responsibility to comply with the terms of the Davis-Bacon Act.

PROCUREMENT DOCUMENTATION

After any project contract is awarded, the following steps must be followed to satisfy Federal audit procedures:

1. Subgrantee prepares a draft of the Request for Proposals or solicitation for bids, whichever is appropriate (VDHP can review and approve the RFP or solicitation if requested).
2. Subgrantee distributes the Request for Proposals or solicitation for bids according to the applicable procurement requirements.
3. Subgrantee must maintain a description of the methods of publicizing the solicitations, including dates and places of publication and posting, and the list of consultants/suppliers to whom the RFP was directly sent.
4. Subgrantee compiles copies of the responses received, or a summary of the responses.
5. Subgrantee reviews all responses and identifies preferred proposal. The method and justification of contractor selection must be documented. Justify the use of negotiation, if applicable.
6. Subgrantee sends the CLG Program Coordinator at VDHP the following documents:
 - A final copy of the RFP or solicitation for bids;
 - A description of the method of publicizing the RFP or solicitation
 - Copies of the responses received, or a summary of the responses
 - Method and justification of contractor selection
7. VDHP CLG Program Coordinator reviews all of the materials submitted per #6, above, to ensure the procurement process is being properly followed.
8. If procurement process is approved, VDHP CLG Program Coordinator notifies the subgrantee to proceed with contract execution.
9. Subgrantee forwards a copy of the fully executed contract the VDHP CLG Program Coordinator within sixty (60) days of execution.

PROJECT PUBLICITY

The VDHP and the National Park Service, Department of the Interior must be credited in any newspaper, radio, television, or other media publicity and in any program or publication of the project being funded. In publications, film or video presentations funded with grant monies, the following **must** be included:

"The activity that is the subject of this (type of presentation) has been financed in part with federal funds from the National Park Service, Department of the Interior, through the Vermont Division for Historic Preservation. However, the contents and opinions do not necessarily reflect the views or policies of the Department of the Interior, nor does the mention of trade names or commercial products constitute endorsement or recommendation by the Department of the Interior."

Please note that only relevant portions of the required statement need to be applied and should be used as appropriate depending on the content of the publication. For example, if there are no commercial products then that part of the statement can be omitted.

In addition, the following statement **must** also be included:

"This program receives federal funds from the National Park Service. Regulations of the U.S. Department of the Interior strictly prohibit unlawful discrimination in federally assisted programs on the basis of race, color, national origin, age or handicap. Any person who believes he or she has been discriminated against in any program, activity, or facility operated by a recipient of federal assistance should write to: Director, Office of Equal Opportunity, National Park Service, 1849 C Street, NW, Washington, DC 20240."

PROGRESS REPORTS AND FINAL PROJECT REPORT

Progress reports and a final project report allow the VDHP to evaluate the project's progress, and to verify that expenses incurred in the project are allowable, necessary and reasonable. The Grant Agreement specifies the due dates and report contents for each report. The typical CLG grant period covers two years, and requires two interim progress reports and a final project report.

Interim Progress Reports

These reports can be informal and submitted in email format. Explain the work completed to date, any issues that have come up, and whether you anticipate completing the project on schedule. Most importantly, include a statement regarding the project budget and whether the project is on budget, over budget, or under budget.

Final Project Report

The final project report must be submitted at the end of the project along with the financial documentation and request for payment. The report should summarize the history of the project, its execution and evaluate its overall success. Explain any issues or problems that the project encountered, and how they were (or were not) overcome. If this was Phase I of a larger project, explain the anticipated next steps to complete the project. Note any local or regional media coverage of the project, and include copies of printed articles or photographs, if possible.

Reimbursement cannot be made until all required information has been submitted to the VDHP for review and approval. Reimbursement for the project will be expedited if the final project report is organized properly and contains all the necessary information.

All allowable project costs must be documented at a level acceptable to the VDHP and auditors who review the VDHP's subgrants. **Costs are eligible only if they appear in the Grant Agreement budget.**

FINANCIAL DOCUMENTATION

The following paragraphs briefly explain the general level of documentation required for common budget items:

- **CLG Personnel:** All employee time, if it is being charged to the project (i.e. being paid with a portion of the CLG grant funding), must be documented on the employer's regular time sheets. Time sheets must be recorded on a daily basis and include a brief description of work performed that is identifiable to the grant project and separate from other non-grant work performed. (For example, "Consulted with VDHP staff on XX" is acceptable; "Grant activities" is not.) *Time sheets must be signed by the employee and the employee's supervisor.* The CLG's financial office should provide a statement of each employee's hourly wage, benefits and what the fringe benefit rate is based upon. For salaried employees, it is not necessary to submit copies of canceled checks as proof of payment. However, for non-salaried employees who are paid by contract or invoice invoices must indicate proof of payment.
- **Donated Services:** Allowable as local matching share when they are performed for approved project work only, and not included in contributions for any other federally assisted program. Documentation for donated services is the same as "CLG Personnel" above. If the CLG's personnel are part of the project budget, but are not being paid from any of the grant funds, then their services are considered "donated." Donated services can also come from other sources, if the person is being paid by another organization, but performing approved project work for the CLG. For instance, a business might donate the services of their personnel to help design a brochure, or provide word processing services.
- **Volunteer Services:** Are the unpaid services of persons performing approved project work. The hourly rate is determined by task and must be consistent with that paid for the same or similar work in the local labor market. Rates are approved before the Grant Agreement is executed. In general, volunteers performing a skill for which they are not trained will only be able to charge the minimum wage rate for their volunteered time. Volunteers must record their hours on a daily basis, being specific about the work performed. *Both the volunteer and project supervisor must sign the time sheet.* The "Record of Volunteer Services" form appended to this manual can be used for this purpose.
- **Contractual:** Copies of contracts executed between the CLG and all consultants and contractors must be submitted at the time they are signed. By federal regulation, the maximum limit for consultants chargeable to a grant project (both federal and matching share) is \$87.74 per hour/daily rate \$705. To document costs, submit copies of itemized bills indicating payment date & check number.

- **Travel:** Submit documentation supporting travel expenditures. Documentation should include date of travel, purpose of trip, destination and total mileage. The maximum reimbursement for travel is not to exceed the current rate paid to state employees for travel which is \$.55 per mile. Submit receipted invoices. Lodging, if budgeted, is documented by invoice. A daily rate for meals, based on state employee rates, will be included in the budget, if necessary to the project and invoices must be provided.
- **Supplies:** Submit documentation supporting expenditures for supplies, including receipted invoices.
- **Donated Equipment:** Donated equipment and office space are often too difficult to document adequately to use as matching share. The CLG may contact the State Agency of Transportation or University of Vermont for information on their equipment use rates. Donated equipment or office space cannot be provided by the federal government, nor donated as part of any other federally assisted project. The donation cannot exceed the fair market rental value. The CLG must submit documentation of its basis for determining valuation, including proof of fair market rental value, the age of equipment, source of purchase and actual use of equipment and/or office space.
- **Telephone:** Submit copies of telephone bills and highlight costs included as part of the project. Total the claimed costs & include receipted invoice.
- **Printing:** Submit documentation supporting expenditures for photocopying and photo processing costs. Include proof of payment.
- **Other:** Include proof of payment and invoices for expenses not included in the other sections.