

The Interagency
Archeological Services Division,
National Park Service

A status report to the archeological community

March, 1976





United States Department of the Interior

NATIONAL PARK SERVICE
WASHINGTON, D.C. 20240

IN REPLY REFER TO:
H22-PI

Dear Colleagues:

Implementation of the Archeological and Historic Preservation Act of 1974 (Public Law 93-291; the "Moss-Bennett" Act) has given increased responsibility to the Interagency Archeological Services Division of the Office of Archeology and Historic Preservation, National Park Service. Not surprisingly, considering the mysterious ways in which the Federal establishment sometimes seems to move, the Nation's archeologists have seemed unsure of the mission and mechanics of our program and have wondered about the relationship of Interagency Archeological Services to other elements of the National Park Service, other State and Federal agencies, and the professional community. Now that the program has begun to pass through its natal period we believe the time has come for a status report to the archeological community that supplements our more formal and statistical Annual Report to the Congress. The report is divided into three parts: (1) mission and objectives, (2) staff professional quality, and (3) archeological contracting. We welcome your comments on the substance of this report.

Sincerely yours,

Rex L. Wilson
Departmental Consulting
Archeologist

Enclosure



I. BACKGROUND

At virtually every stage in the development of American archeology, some government agency has acted as the discipline's interface with the Federal establishment. The nature of this interface has reflected and affected the practice of archeology and the construction of archeological law. The Interagency Archeological Services Division (IAS), National Park Service is the latest of these interfaces. As a replacement of the Interagency Archeological Investigations and Salvage Program whose scope essentially had been limited to implementation of the Reservoir Salvage Act of 1960, the IAS program is a broader and more complex managerial system reflecting the complexities of contemporary environmental and historic preservation law and policy and the increasing sophistication and professionalization of archeology.

The Division is also a reflection of the increased recognition given to archeology and historic preservation by the Federal Government. Whereas its predecessor operated as a minor program of the National Park Service (NPS) handled through NPS Regional Offices or archeological centers whose primary mandate was the administration of the National Parks, the Interagency Archeological Services Division is a prominent element of the Office of Archeology and Historic Preservation (OAHP) whose clear and straightforward mission is the identification, protection, and enhancement of the nation's cultural resources.

A. Coordination with historic preservation agencies. The position of IAS within OAHP makes possible a close working relationship with the

National Register of Historic Places, the Historic American Buildings Survey, the Historic American Engineering Record, the Grants-in-Aid Program, the National Historic Landmarks program, and programs of other divisions concerned with historic preservation. Through OAHP, the IAS also maintains liaison with the historic preservation officers of all States and territories. This has resulted in a potential, only gradually being realized, for a comprehensive national program of interdisciplinary cultural resource management based on understanding and cooperation among archeologists, historians, architects and planners.

B. Coordination with other agencies. IAS regularly advises Federal and non-Federal agencies on their responsibilities under the Antiquities Act of 1906, Executive Order 11593 and the Archeological and Historic Preservation Act of 1974 as well as other related Federal laws and policies such as the National Environmental Policy Act of 1969 and the National Historic Preservation Act of 1966. The Division provides professional assistance to agencies in their development of internal policies and procedures. In addition, it is responsible for the administration of archeological investigations at sites to be damaged or destroyed by Federal or federally related construction projects. Other coordination responsibilities include the preparation of procedures, guidelines and standards for archeological work carried out by the Federal Government.

C. Coordination with the profession. IAS endeavors to represent the interests of the archeological profession within the Federal Government. Contrary to the limited scope of the earlier archeological salvage program, whose interaction was largely restricted to the writing and very

restricted administration of survey and salvage contracts, current IAS activities have greater breadth. Contract operations remain an important part of our business, however, and a concerted attempt is being made to upgrade the scientific and legal adequacy of that work (see Sections II and III of this report). We also are becoming more heavily involved in other types of interaction, including:

1. *Experimental programs.* IAS has written contracts for a series of studies related to the general issue of planning in the management of archeological resources, i.e., attempting to link up predictive statements about the distribution of archeological resources with the projected future distribution of land-uses that could damage such resources. Studies have been undertaken in eastern New England, the St. Louis area, the Gulf of Mexico outer continental shelf, and oil shale lands in Utah, Colorado and Wyoming. Analysis of these and related studies is currently leading to the development of a set of procedures for comprehensive archeological planning to be implemented by State Historic Preservation Officers (SHPO's) and other resource managers. Contracts for other innovative studies will be undertaken as needs are recognized and funds become available.
2. *Professional input.* IAS has contracted with the Society for American Archaeology for a series of six conferences to develop concepts and recommendations from within the archeological discipline about such matters as professional standards, standards for report preparation, cultural resource management,

Native American-archaeologist relationships, etc. These conferences were held at Airlie, Virginia, during 1974 and publication of results is expected soon. The results of some of the Airlie seminars should be of assistance in guiding IAS and the profession as we face new and complex problems together.

We also continue to interact with the Interim Committee on Professional Standards established by the Society for American Archaeology, Archaeological Institute of America, Society for Historical Archaeology, and American Society of Conservation Archaeology as it moves toward the development of new standards and professional recognition procedures.

3. *Internships.* In order to increase communication with the academic community as well as to improve the professional diversity and strength of the Division, IAS has established an internship program that brings practicing professionals as well as graduate students into the IAS Division on temporary appointments. At the present time Frank W. Eddy (Ph.D., Colorado) and Judy Shafter (MA candidate, Colorado) are serving as interns in the Denver office; Pandora Snethkamp (MA candidate, SUNY-Binghamton) and Julia Elmendorf (MA candidate, Catholic) are serving as interns in the Washington Office. IAS is also in the process of employing several advanced graduate students on part-time appointments to assist the staff in both the field and Washington offices. All interns are receiving wide exposure to the diverse activities of the Division.

The heavy emphasis upon liaison in the mission of IAS requires an organization that facilitates communication with governmental agencies, industry, and the archeological profession; provides for maintenance of high standards of professionalism; and permits its personnel to devote full attention to program needs and responsibilities. To achieve this, program responsibility and oversight are conducted from the Washington office while three field offices--in Atlanta, Denver and San Francisco--were established in June 1975, to manage day-to-day program activities. These field offices (Table 1) are now completely separate from the National Park Service Regional offices, archeological centers and parks. Each field office oversees approximately one-third of the Nation. Their respective boundaries are drawn along major drainages (dotted lines on Figure 1) to facilitate coordination with water resource development agencies (e.g., Corps of Engineers and Bureau of Reclamation). For coordination with agencies whose programs are organized on a State boundary basis (e.g., Soil Conservation Service, Department of Housing and Urban Development, Federal Highway Administration, etc.) the field office territories are drawn along State lines (solid lines on Figure 1).

II. PROFESSIONAL QUALITY

A frequent and serious problem for archeologists engaged primarily in administration is that of maintaining professional skills and involvement. Administrative archeologists have all too frequently become "fossilized" in their professional development and the management of contract programs in the past by such archeologists has perniciously affected the Federal Government's ability to procure high quality

Table 1: IAS Division office mailing addresses, locations and telephone numbers.

WASHINGTON OFFICE

Rex L. Wilson
 Chief, Interagency Archeological Services Division
 and Departmental Consulting Archeologist
 Office of Archeology and Historic Preservation
 National Park Service
 Department of the Interior
 Washington, D.C. 20240

Telephone: (202) 523-5293

Office Location: 1100 L Street, NW.
 Room 5121

ATLANTA FIELD OFFICE

Wilfred M. Husted
 Acting Chief, Interagency Archeological Services-
 Atlanta
 Office of Archeology and Historic Preservation
 National Park Service
 730 Peachtree Street, Room 1010
 Atlanta, Georgia 30308

Telephone: (404) 526-2611

DENVER FIELD OFFICE

Jack R Rudy
 Chief, Interagency Archeological Services-Denver
 Office of Archeology and Historic Preservation
 National Park Service
 1978 South Garrison St. - Suite 107
 Denver, Colorado 80227

Telephone: (303) 234-2560

SAN FRANCISCO FIELD OFFICE

John J. Hoffman
 Acting Chief, Interagency Archeological Services-
 San Francisco
 Office of Archeology and Historic Preservation
 National Park Service
 P.O. Box 5700
 San Francisco, California 94101

Telephone: (415) 556-7741

Office Location: 7th and Mission Streets
 Old Post Office Building
 Room 425

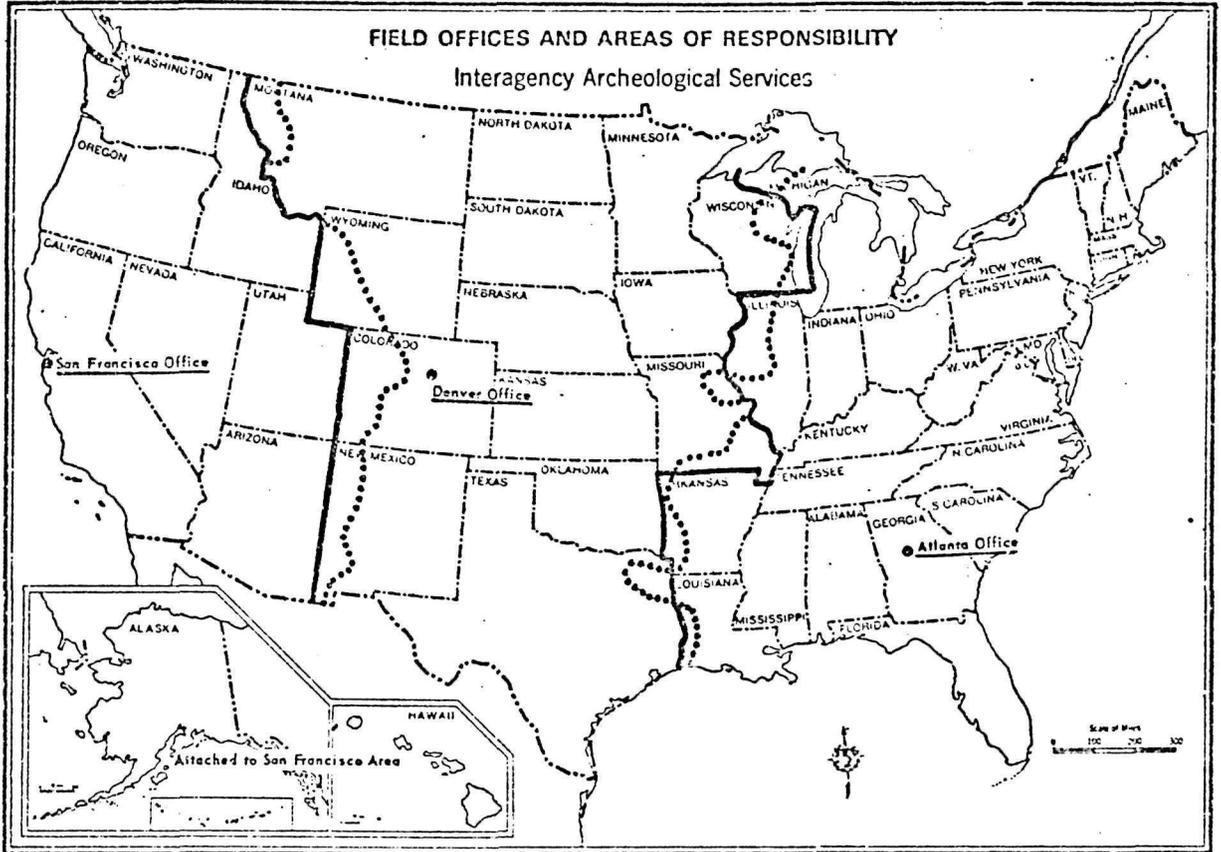


Figure 1: Map showing IAS field office locations and areas of responsibility.

archeological studies. Accordingly, we are taking steps to avoid recreating the professional adequacy problem which the establishment of this Division was intended to correct. Our efforts focus on four aspects of this problem:

- A. *Increasing the number of archeologists working on external archeological programs;*
- B. *Elevation of expectations for the level of professional training and experience necessary in staff archeologist positions.*

- C. *Institutionalizing incentives to maintain and develop professional skills;*
- D. *Modifying the process of administering archeological work so that the impact of more and better staff archeologists will actually be realized in quality control activities.*

Although precise figures are not immediately available to us, it appears that during the six month period prior to the establishment of IAS field offices in June 1975, approximately 13 NPS archeologists were working more or less full time on the external archeology program. At the present time the IAS Division has a total of 23 full time archeologists currently working in or about to enter the program--an increase of more than 75 percent. (A list of our current professional personnel is given in Table 2). Our immediate plans (i.e., over the next three months) call for the recruitment of three more archeologists (2 Ph.D's; 1 MA) in permanent positions and six additional MA level interns. Thus, after one year of operation we expect to have increased the effective professional staffing on external archeological programs by nearly 150 percent.

During our personnel recruiting since last summer, we have stressed higher levels of formal academic training and experience, balanced by the recruitment of some less experienced personnel. We are attempting to develop an organization in which recently graduated and less experienced archeologists can work for and learn from more highly trained and experienced personnel, with the result that both intellectual vitality and organizational mobility can be maintained. Histograms presented in Figure 2 clearly show the substantial change that has resulted. Formerly the modal class was

Table 2: Personnel Roster

INTERAGENCY ARCHEOLOGICAL SERVICES DIVISION
Office of Archeology and Historic Preservation
National Park Service
Washington, D.C.

NAME	ORGANIZATIONAL TITLE	HIGHEST DEGREE	THESIS/DISSERTATION TOPICS
<u>Washington Office</u>			
Rex L. Wilson	Departmental Consulting Archaeologist & Division Chief, Supervisory Archeologist	MA-University of Oklahoma ABD-University of Oklahoma (Ph.D. expected 1976)	"Management in the Federal Archeological Programs"
Lawrence E. Aten	Deputy Division Chief, & Coordinator, Executive Order 11593 Program, Supervisory Archeologist	BS-(Geology) University of Houston ABD-University of Texas Austin (Ph.D. expected August 1976)	"Cultural Ecology of the Upper Texas Coast"
Charles M. McKinney	Archeologist, & Coordinator, Federal Antiquities Program	MA-American University (1974)	"Scavenger Displacement of Faunal Resources: Implications for Archaeological Site Interpretation"
*Thomas F. King	Archeologist	Ph.D.-1976, University of California/Riverside	"Political Differentiation Among Prehistoric Hunter-Gatherers: An Archaeological Test"
Ronald C. Corbyn	Archeologist	BS-(Geology) West Texas State; MA-Pennsylvania State University (expected 1976)	"Archeological Photointerpretation of the Deer Creek Site, Kay County, Oklahoma" (research paper)
*Pandora E. Snethkamp	Archeologist (student intern)	BA-1974, SUNY/Buffalo MA-(expected 1976) SUNY/Binghamton	"Contracts, Research and Funding: The Worcester Archaeological District as a Case Example"
*Julia O. Elmendorf	Archeologist (student intern)	BA-1974, George Washington University MA-(expected 1976) Catholic University	"The Relationship Between Evidence of Nutritional Depriva- tion and Life Expectancy in Two Ossuary Skeletal Populations from Nanjemoy Creek, Maryland"
*Janet G. Kopleck	Social Science Aid (Anthropology)	AB-(Anthropology) 1973 University of California/ Berkeley	--
<u>Atlanta Office</u>			
**Bennie C. Keel	Chief, Atlanta office Supervisory Archeologist	Ph.D.-1972, Washington State University	"Woodland Facets of the Appalach- ian Summit Area"
Wilfred M. Husted	Supervisory Archeologist	MA-1962, University of Colorado	"A Proposed Archeological Chronology for Rocky Mountain National Park Based on Projectile Points and Pottery"
Victor A. Carbone	Archeologist	Ph.D.-1976, Catholic University	"Environment and Prehistory in the Shenandoah Valley"
Harry G. Scheele	Archeologist	Ph.D.-1970, Harvard University	"Chavin Influence on the Central Coast of Peru"
**Vacant-in process of recruitment	Archeologist	Ph.D. level	--

Table 2:--continued

NAME	ORGANIZATIONAL TITLE	HIGHEST DEGREE	THESIS/DISSERTATION TOPICS
<u>Denver Office</u>			
Jack R Rudy	Chief, Denver Office, Supervisory Archeologist	BA-1950, University of Utah	--
Roy W. Peaves III	Archeologist	BA-1968, University of New Mexico	--
Thomas D. Thiessen	Archeologist	MA-1976, University of Nebraska	"Middle Missouri Tradition Occupational Sequences for the Cannonball and Knifeheart Regions"
Donald C. Fiero	Archeologist	MA-1970, University of Arizona	Non-thesis degree
*Frank W. Eddy	Archeologist (senior professional intern)	Ph.D.-1968, University of Colorado	"Culture Ecology and Prehistory of the Navajo Reservoir District"
*Judy A. Schafer	Archeologist (student intern)	MA-1976, University of Colorado	Non-thesis degree
**Vacant-in process of recruitment	Archeologist	MA level	--
<u>San Francisco Office</u>			
Garland J. Gordon	Chief, San Francisco Office (temporarily detailed to special project on effects of inundation), Supervisory Archeologist	MA-1971, University of Arizona	Non-thesis degree
John J. Hoffman	Acting Chief, San Francisco Office, Supervisory Archeologist	MA-1960, University of Montana	"Preliminary Archaeological Survey of Yellowstone National Park"
Richard W. Casteel	Archeologist	Ph.D.-1972-University of California/Davis	"The Use of Fish Remains in Archaeology with special Reference to the Native Freshwater and Anadromous Fishes of California"
**Vacant-in process of recruitment	Archeologist	Ph.D. level	--

*Temporary appointments

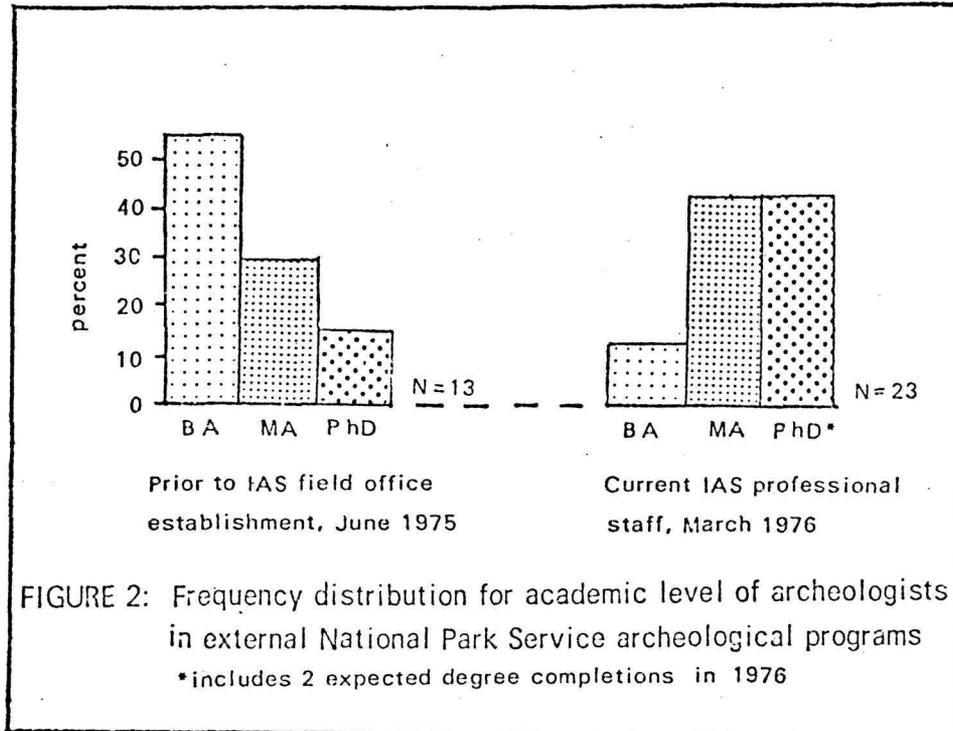
**Expected to enter on duty soon after April 1, 1976.

Note: Each field office has a full clerical support staff including an administrative officer.

that representing archeologists trained to the baccalaureate level, whereas the present mode represents archeologists trained to the masters and doctoral levels. This change did not occur casually or through the normal course of events. It resulted from a deliberate selection process and from careful setting of standards and objectives for staff personnel.

Having initiated progress toward upgrading the level of quality in the professional staff, we have lately turned to the matter of trying to prevent, or at least to retard, the intellectual fossilization referred to earlier. While we believe that maintaining one's professional credentials is essentially a personal responsibility, at the same time it is clearly in the interest of the Division's objectives for us to encourage professional "maintenance." For this reason, we have established a program whereby archeologists working within the Division for more than six months, who are not on student appointments and who are satisfactorily performing their regular duties may be allowed to use up to 20 percent of their work time for a structured schedule of professional development activity such as research, reading or academic coursework. A program such as this is in no sense a luxury, but is fundamental to accomplishment of our mission.

We believe that an archeological staff no matter how well qualified, however, cannot capitalize on its professional strengths unless permitted to function in an administrative setting which allows this professionalism to be applied. Major innovations in the area of procurement (to be described in the next section of this report) cannot function except in a setting of high professional competency. Beyond



this, however, we have initiated a management system to provide our archeological staff with managerial skills and guidance necessary to apply their archeological knowledge more effectively. The basic management system of the National Park Service, and one that is widely used in government and industry, is known as "Management by Objectives" or MBO. Two of the senior staff have now completed MBO training and MBO techniques are gradually being introduced throughout the Division. In addition to this training, eight archeologists representing all four offices of the Division, have attended or will soon attend courses to develop their knowledge of contract administration techniques and procedures. We will aggressively pursue this management training for more of our archeologists during the coming year.

Finally, through a series of policy statements referred to internally as Administrative Memoranda we have, for the first time, provided the

Division and the external archeology program with comprehensive policy guidance on a wide range of issues. We continue to revise and augment these policy statements to deal more adequately with current archeological problems. For example, it was recently necessary to clarify our policies regarding (1) disposition of excavated materials (we prefer they remain in or near the region from which they were excavated); and (2) the notion that archeological sites can be preserved by burial under earth or other fill (we do not consider this a mitigation technique except under very special circumstances).

III. CONTRACTING

The "old" Interagency Archeological Investigations and Salvage Program evolved in response to an emergency need--that of "beating the bulldozer." Contracting procedures tended to grow with the program and accumulated many inherent problems, most of which tended to be overlooked because "we were getting the job done." Some of the more obvious drawbacks were:

- A. Salvage archeology generally was the only possible response when archeological resources were threatened. Needs for salvage were largely determined by the contractor during the contract negotiation stage. Surveys and salvage were undertaken simultaneously and often without an overall research plan. The National Park Service exercised only nominal responsibility in identifying research needs, reviewing research designs, and defining possible expected research results.

- B. Contracts were let on a basis of "who was most available" and "who was willing to take the job at the price we were prepared to pay." Past performance under contract was a secondary consideration because it was more important to salvage the site than to be much concerned with how it was being salvaged. This tended to support a situation in which the same institution or individual received contracts year after year without judicious attention to the quality of work performance or critical evaluation of who in fact might be best qualified to do it. This formed part of the basis for allegations of "favoritism" and "cronyism" as well as often virtually institutionalizing low quality work.
- C. Contracts were viewed by many contractors as "grants" for personal research and not as a business relationship for the recovery and preservation of data identified as important to overall area research needs.
- D. In the general absence of coordinated planning, adequately prepared research designs, and effective National Park Service contract monitoring, "salvage" tended to be piecemeal, executed on a "crisis" basis, and frequently only one step ahead of construction.
- E. Because of the difficulty of getting reports from many contractors, almost anything submitted as a contract report was accepted simply to close out the file on the agreement.

Traditionally little more than descriptive reports of findings was explicitly required and reports were often accepted without adequate professional critique or consideration of whether they met acceptable contemporary professional standards. Meeting National Park Service report standards had often come to mean an exceptionally low threshold of adequacy. Under the contract administration practices in earlier days there was little consistent effort to promote professional adequacy in the identification of research needs in development of contract proposals, in generating research designs, and in evaluation of results.

If we have learned anything at all during the past years of archeological salvage, it was that the program will not manage itself; wherein contractors, on their own volition, would employ the best methods for the most important problems on the most significant sites and report these results in a timely fashion so as to make real contributions to knowledge. In the process, "salvage archeology" has been widely disparaged as second rate archeology. In recognition of the development of important trends toward the solution of many theoretical and methodological problems the National Park Service has joined in these efforts with the objectives of improving the quality and timeliness of salvage archeology operations. More or less simultaneously with the development of this basic commitment to change by the IAS Division, we were advised by our legal counsel that serious legal defects demanding immediate correction existed in our current contracting process. Federal

Procurement Regulations (Title 41, Code of Federal Regulations) are extremely complex and pose many unfamiliar terms and practices to archeologists. They are, however, explicitly designed to promote both quality and equitability in all aspects of procurement. These regulations, although cumbersome, provide a system with many valuable features that support and promote the quality improvement goals of the profession and of the IAS Division. However, there is a price to be paid for this system. In order for the procurement system to be effective, it requires constant technical input and maintenance by administrative archeologists. There is no turning back. The former process of sole source/low maintenance procurement is legally as well as professionally inadequate and will never return. The only options that exist are either to push ahead and utilize the advantageous features of the procurement system that are available to us or, alternatively, return to administrative confusion, delayed projects, probable litigation, and last but not least, questionable archeology.

Our "new" contracting approach is not a "canned" process but is one that must evolve and be adapted to archeological investigations. Therefore, archeologists outside the National Park Service have an important role to play by making known to us their observations and current problems with procurement. Comments and queries already received from colleagues have led to important policy and procedural modifications and we anticipate more over the next year or so as we adjust to this new format.

We will continue to use a form of negotiated procurement because we recognize that in archeological investigations it is impossible to draft

precise specifications for required services and end products. But we have abandoned sole source contracting with the larger educational institutions as basic policy. This practice unduly restricts the research market, discourages intellectual growth and innovation, and unfairly and illegally eliminates qualified small institutions, private concerns and individuals from consideration for contracts.

Negotiated procurement involves several steps; basically, these are:

- A. Preparation and distribution of a Request for Proposals.
- B. Evaluation of proposals for technical adequacy.
- C. Negotiation with offerers of technically adequate proposals and discussion of price.
- D. Selection of proposal and award of contract.
- E. Ongoing review of contractor's work progress and performance.
- F. Technical review of draft final report for professional and contractual adequacy.
- G. Acceptance of final report and completion of contract.

Preparation by the IAS Division of a Request for Proposals (RFP) includes the scope-of-work stating the purpose and circumstances of the investigations needed; technical background information on the resources to be investigated; and minimal preservation or research needs that have been identified through prior research in the area and have been agreed upon through compliance with the procedures of the Advisory Council on Historic Preservation.

Additionally, the RFP describes any time constraints (on contract performance, prescribes minimal personnel and organizational qualifications, establishes a basic report format, sets the criteria against which all proposals will be evaluated, and establishes a time frame in which proposals can be accepted for consideration. Notice that we are requesting proposals is published in the "Commerce Business Daily," a Department of Commerce publication, and these also are mailed to all known qualified sources within the State that investigations are to take place, and within all adjacent States.

All proposals received in response to our Request for Proposals are reviewed by a technical evaluation panel, usually composed of at least three archeologists, and are evaluated on the basis of research design quality, responsiveness to the minimal research needs identified in the scope-of-work, prior performance under contract and other specified factors. Proposed budgets and schedules are reviewed for their feasibility, but total price is not weighted during proposal review. Those proposals found to be so inadequate that they could not be significantly improved without a major rewrite are excluded at this stage. The contracting officer then negotiates with the remaining offerer(s) on the strengths or weaknesses of their proposal(s). The proposal that is ultimately determined to be of the most satisfactory quality is then selected for contract award. It is important to understand that in this form of contracting we are dealing with competitive proposals, not competitive bids. Contracts are awarded on the basis of a proposal's overall adequacy and not on the basis of lowest price. Although it may

be necessary to negotiate the actual contract price, selection of the successful offerer by the IAS Division is not and will not be solely on the basis of price. All organizations and individuals who submitted proposals which, in turn, were not selected for contract award are entitled to a full written debriefing as to the reasons for this. And finally, once a contract has been written, we will maintain a closer coordination with the contractor as work is in progress to assure that Federal agency commitments for archeological mitigation are being carried out. Final evaluation of reports of investigations will receive careful written evaluation by either IAS staff archeologists or by outside peer reviewers.

We believe the result will be to create a fair and open research market for investigations, in which any qualified institution, private corporation, or individual may compete for contracts on the basis of their qualifications and the merits of their preservation plan or research design proposal. We view this approach to contracting as a means of introducing and encouraging fresh approaches and new vitality in resource preservation and research, and as a means by which a broader range of archeological interests ultimately will be served. The challenges we face have never been greater nor has there ever been a greater opportunity on our part to contribute substantially to knowledge. Our success or failure depends altogether on how much effort we are willing to invest.