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## ACRA Meets With Advisory Council to Discuss Proposed Changes to Section 106 Regulations

On February 4, 1997, representatives of ACRA, along with representatives of the National Park Service, the Society for American Archaeology, the Society for Historical Archaeology, and the National Association of State Archaeologists met in Washington, D.C. with staff of the Advisory Council on Historic Preservation to discuss the proposed changes in 36 CFR 800, the regulations that implement Section 106 of the National Historic Preservation Act. The meeting, convened by the Council, was intended to address issues of concern to the archaeological community.

ACRA has maintained that the principal areas of concern in the proposed regulations cut across disciplinary boundaries. Accordingly, the organization was represented in Washington by archaeologist Dan Roberts, architect Charissa Wang, and historian Patrick O'Bannon. Prior to the meeting, ACRA identified five major concerns with the proposed regulations: the excessive complexity of the regulations, the lack of opportunity for meaningful public participation, the continued disconnection between the NEPA and Section 106 processes, the increased role of the State Historic Preservation Officers, and the use of standard treatments for archaeological resources. Only the last of these issues is exclusively an archaeological concern.

Council representatives acknowledged that they had received comments from a variety of groups regarding the broad areas of concern identified by ACRA, and noted that these issues will be addressed by the task force preparing the final regulations. The meeting then focused upon the question of standard treatments for archaeological resources. Council representatives listened to the views of all the meeting participants

and proposed several alternatives to the current regulatory language, including doing away with standard treatments altogether, providing better guidance regarding when and how to use standard treatments, and expanding the notion of standard treatments to include a variety of non-archaeological resource types. No consensus was reached, but the Council representatives stated their intention to raise the issue and several of the potential solutions, to their task force.

...continued on Page 4

## ACRA Winter/Spring Board of Directors Meeting

The ACRA Board of Directors will hold its winter/spring meeting in Cincinnati at the Omni Netherland Hotel downtown on March 1 and 2, 1997. All members are invited to attend, in particular members in the Cincinnati area. The meeting will be held from 8:00 a.m. to 4:00 or 5:00 p.m. on Saturday and on Sunday as needed. Some of the topics for discussion will be the 1997 annual conference, policy making on various issues, and the budget. A final agenda will be developed and distributed to the board members seven days prior to the meeting. The preliminary agenda, detailed on page 2, is subject to change. Anyone who would like to put an item on the agenda, please contact Tom Wheaton at 770-498-5159 or [tomwheaton@aol.com](mailto:tomwheaton@aol.com).

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# Preliminary Agenda for Cincinnati Board Meeting March 1-2, 1997

*Prepared by Tom Wheaton, Executive Director*

## 1. Discuss General Liability Policy for our conferences, workshops, meeting places, etc.

## 2. 1996 Balance Sheet

## 3. Dues update

## 4. Brochure Displays

## 5. Committee Reports

- Labor Relations Committee (Kevin Pape)
- Education Committee (Joe Schuldenrein)
- Competitive Practices Committee (Patrick O'Bannon)
- Membership Committee (David Ketz)
- Workers' Safety Committee
- Awards Committee (Adrian White/Cory Breternitz)
- SHPO Contract Seminars Committee (Kevin Pape or Patrick O'Bannon)
- Government Relations Committee (Dan Roberts)

## 6. Setting Policy

- How to make policy
- Status of Issues Not Covered by Existing Committees
- Dealing with appeals for our help
- USGS Issue
- Women in CRM
- Tempe Conference
- Section 106
- Section 110
- Pennsylvania SHPO
- Illinois SHPO regulations and position qualifications.
- NPS Strategic Plan
- NPS position qualifications
- ACHP Eligibility Guidelines
- ACHP-COE PA
- ACHP-BLM PA
- Gutting the Antiquities Act
- COE limitation on area of effect
- NYAC Beverwyck Site
- NAGPRA
- TCPs

## From ACRA Goals Early On Not Covered by Existing Committees

- Group discounts
- Standard terms/descriptions for job categories
- Improve salaries and wages
- Variation in Section 106 Enforcement
- Variation in federal procurement procedures

## From ACRA-L

- Privatization of university and state programs
- OSHA
- Kennewick Man
- Large vs small businesses
- NAGPRA Amendments
- EDI/VANs
- FOIA and state site forms and reports
- Professional certification
- Job Searches/announcements
- Ethics
- COE Nationwides
- Albuquerque Petroglyphs in Danger
- Non-profit organizations
- Native American Consultation
- Military housing targeted
- Definition of cultural resources
- Qualifications of technicians
- National Regulation Criterion D

## 7. Annual Meeting

## 8. New Regulatory Committee (policies, regulations, qualifications)

## 9. Representation at Conferences

## 10. Conference Symposia on Business of CRM

## 11. Officers (2 presidents)

## 12. Attendance of Board Members

## Workers' Compensation Insurance: It's Your First Priority

By Chris Butler, C & D Butler, Inc.

One of the most important components of any business insurance program is workers' compensation. Surprisingly, many companies do not realize the importance of this coverage and choose not to purchase it. In this issue of the ACRA Edition, I want to discuss why a business should carry the coverage and review some key points to know when you are insuring your employees.

I have worked with many clients over the years. One of the questions a client often will ask is 'Do I need workers compensation insurance?' My answer in almost all situations is an emphatic 'Yes!' There are basically two reasons to carry this insurance.

The first reason is that it may be required by law, depending on the number of employees you have. In Georgia, if you have three or more employees, you must carry this type of coverage. Obviously, each state law may differ on the number of employees. The key point is that you could be in violation of your state law.

Secondly, if you do not have coverage to protect your employees, you are ultimately responsible for them if they are hurt on the job. I personally believe that every employer should take this responsibility seriously. If they cannot personally afford to pay for all medical expenses, loss wages, and other related expenses, they should buy insurance to do so. Unfortunately, many business owners choose not to buy workers' compensation insurance due to the cost. Even if you have only one employee, not to have workers' compensation insurance to protect that individual is not right. It makes good sense to carry the coverage.

Now that you have decided to purchase workers' compensation insurance, here are a few things to be aware of when you buy it:

- First, every business is classified according to the particular hazards of that business. For example, a roofer may have a rate of \$40.00 per 100 of a payroll, whereas an office employee's rate would be \$0.49 per 100. As you can see there is a significant difference in the two. It is important to make sure you are placed in the proper class code. Most archaeologists and historians should be classified as either code 8810- clerical or 8601 - engineer,

architect, or consulting. Those employees who work predominantly in the field would fall into code 8601. Can you split a payroll into two codes for an employee? The rules state you cannot, but if you keep accurate records and provide detailed records, some insurance companies may allow it. If you are classified as anything other than one of these two codes, please give me a call. I would like to know what class code is being used.

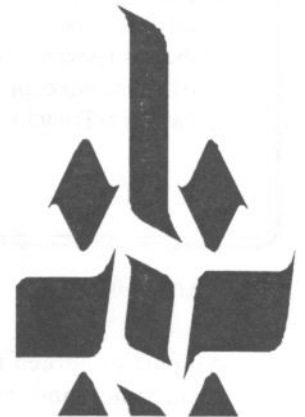
- Independent contractors are always an issue which cause a lot of confusion. It is my opinion that many companies are calling individuals independent contractors when they are actually employees. My understanding is that if you have control over what that individual does and when he or she does it, then they are employees. If they are considered employees, then you are responsible if they are hurt. Also, the insurance company will consider their payroll when determining the premium.

I am not suggesting that there are not some people who are truly independent contractors. However, you should be comfortable that they meet the definition of an independent contractor. If you are not carrying workers' compensation because you are using only independent contractors, you may be surprised how quickly someone who is injured suddenly considers themselves an employee. Not surprisingly, workers' compensation review panels are very liberal in their definition of an employee.

I hope this article has helped you understand why you need to have workers' compensation insurance. During the past year I have emphasized the need for professional liability insurance, but workers compensation insurance is **your first priority**. If you have employees and do not have workers' compensation insurance, get it now!

### Correction

In the January issue of *ACRA Edition* there was an notice entitled "Get The CBD On-line For Free!" In that notice we inadvertently stated that Khera Communications provided a search operation at the monthly fee of \$129. **This amount reflects the annual that Khera Communications charges for this service, not the monthly fee.** We apologize for the error.



## ACRA SPONSORED HEALTH AND SAFETY COMPLIANCE TRAINING

The Occupational Safety and Health Administration (OSHA) regulations affect ACRA members through potential federal OSHA or state OSHA enforcement, contract requirements from clients, insurance company requirements, and labor relation agreements. ACRA members that have been cited by OSHA have had proposed fines over \$ 10,000.00.

Two key requirements in most OSHA standards are employee training and written compliance programs. The goal of this program is to provide attendees with both the training required by the OSHA standards affecting ACRA membership and to provide draft written programs for use by firms sending attendees to the classes.

The coverage for the two and one half-day class will include:

- \* DOT/EPA/OSHA Overview of Enforcement
- \* Hazard Communication
- \* Respiratory Protection
- \* Bloodborne Pathogens/Biological Hazards
- \* Confined Space (Awareness Level)
- \* Personal Protective Equipment
- \* Lockout/Tagout
- \* Electrical Hazards
- \* Fall Protection
- \* Lead (Awareness Level)
- \* Asbestos (Awareness level)
- \* OSHA Recordkeeping
- \* Excavation/Trenching

Certificates will be provided to those completing the course, providing a listing of course content and providing documentation meeting OSHA training requirements.

WHEN: March 20-22, 1997.

WHERE: The Roosevelt Hotel  
1531 7th Avenue  
Seattle, WA 98101  
206-621-1200

INSTRUCTOR: Phillip L. Jones, CIH  
Vice President  
Safety and Industrial Hygiene Practice  
Woodward-Clyde

COST: ACRA Members \$500.00 per person  
non-ACRA \$600.00 per person

Those who wish to enroll for the course should contact Tom Wheaton and submit their registration fees directly to him. Hotel arrangements should be made by course attendees, but a block of rooms has been reserved. The \$95/day rate for rooms is a flat rate (single, double, triple).

Tom Wheaton  
Executive Director, ACRA  
c/o New South Associates  
6150 East Ponce de Leon Ave.  
Stone Mountain, GA 30083

### Section 106..

(..continued from Page 1)

All parties agreed that the basic regulatory framework for identifying and evaluating resources was probably adequate, although the need for good, concise guidance remains critical. ACRA representatives pointed out that these concerns are relevant to all the professional disciplines.

The Council representatives clearly stated their intention to publish final regulations about August 1, 1997, with the regulations going into effect on October 1, 1997. It is clear that, barring extraordinary circumstances, the CRM community will be operating under new Section 106 regulations by the end of the year.

Patrick O'Bannon, Government Relations Committee

### United States Geological Survey Responds to Questions on Changes in Topographic Mapping

Last month *ACRA Edition* published an article entitled "Impending Changes to USGS Topographic Maps: Changes Will Affect the CRM Community," by Donald C. Haney. In response, Mark DeMulder of the USGS Headquarters in Reston, VA, has written a 14-page article concerning the statements made in Mr. Haney article that suggest that the proposed changes in paper topographic maps "will degrade the quality of these maps and have a negative impact on the majority of individuals who use these maps." Mr. DeMulder's response, entitled "The Evolution of Topographic Mapping in the U.S. Geological Survey's National Mapping Program," can be found at [www.usgs.gov](http://www.usgs.gov) under *What's New!*

# STRAIGHT FROM THE T-SQUARE

*Contributing Editor*

*Donald M. Durst*

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## “AIA’S 1997 LEGISLATIVE PRIORITIES”

Now that the 105th Congress has finished inaugurating each other and is ready to get down to work, it is time for organizations such as ACRA and AIA to begin their 1997 lobbying efforts. According to a written article published in the January 1997 edition of *AIArchitect* by Ms. Marcia Frenz, Program Director of Federal Affairs for the AIA, there are four major issues that the AIA is watching very closely. These include upgrading the school infrastructure, handicap accessibility, community redevelopment, and transportation. Ms. Frenz believes the proposed legislative action will have a direct effect on the architectural community.

The AIA cites government studies show one-third of U.S. schools need major repairs and renovations. Currently, Sen. Carol Moseley-Braun (D-Illinois) and Rep. Nita Lowery (D-New York) are sponsoring a bill to promote extensive repairs to the school infrastructure. The AIA is supporting this initiative.

An accessible built environment is an issue for which the AIA has been a leading advocate for several years. AIA would like Congress to grant the Department of Justice the authority to clarify and strengthen the American with Disabilities Act (ADA). At present, several critical points in the guidelines for both public and commercial buildings are vague, and have led to lawsuits. Both architects and owners have found themselves in litigation because they were sued by various organizations

who believed certain facilities did not comply with ADA.

In 1996, the Commercial Revitalization Tax Credit Act (CRTC) was introduced to Congress. It is scheduled to be reintroduced this year. The CRTC would establish a tax credit to encourage businesses to locate and refurbish commercial buildings in designated economically distressed areas. The AIA is actively supporting this initiative because it will help provide funding to a much needed urban and community renewal policy.

Finally, the Transportation Enhancement Program (TEP) administered under the Intermodal Surface Transportation Efficiency Act (ISTEA) is scheduled to be reauthorized this year. TEP provides funds for the historic preservation of old transportation centers and the development of scenic and historic byways. AIA believes this legislation should be reauthorized and is working with Congressional members to see to its renewal.

Obviously some issues will have a more direct bearing on our profession than others. However, all proposed legislation will have an impact on our communities and ultimately will affect how we feel as citizens. The schools that our children attend may use the proposed federal grants. We need to look at our offices to see if they are truly handicap accessible and to learn what our liability may be. CRTC and TEP, if passed, provide two important tools to help rebuild our cities and create a quality urban environment. If you would like to learn more about AIA’s priorities, call Ms. Marcia Frenz at 202-626-7404.

## ISTEA Reauthorization Alert

The battle to reauthorize the Intermodal Surface Transportation Efficiency Act (ISTEA) is officially underway. During the next few months, it is critical for historic preservation and transportation reform advocates to make their views known to Congress. It is critical that we generate letters of support for ISTEA and its Enhancement Program component. ISTEA authorized \$155 billion over six years for highways, highway safety, and mass transportation when it passed in 1991 - including a mandatory 10% to be set-aside from the Surface Transportation Program for the highly successful Transportation Enhancement Program. Transportation Enhancement Projects have pumped nearly half-a-billion federal dollars into historic preservation projects since 1992. Any re-trenchment of the Enhancement Program during the ISTEA reauthorization process would have major consequences for historic preservation activities in all 50 states.

We urge you to take action now by writing your congressional representatives and expressing your support for ISTEA’s reauthorization. If you have any questions, please call the Department of Law and Public Policy at 202-588-6255.

National Trust for Historic Preservation, February 14, 1997.

# Legislative Update

ACRA/SOPA Weekly On-Line News  
February 14, 1997

## SENATE INTERIOR APPROPRIATIONS HEARINGS SET

Senate hearings on the fiscal 1998 Appropriations for Interior & Related Agencies have been tentatively set as follows (all the hearings will begin at 9 a.m., rooms TBA):

March 13 - Secretary of Energy  
April 10 - Bureau of Indian Affairs and Indian Gaming Commission  
April 17 - Forest Service  
April 24 - National Endowments for the Arts and Humanities  
May 1 - Secretary of the Interior (to include other Interior agencies, such as the National Park Service, Bureau of Land Management, Fish and Wildlife Service, etc.)

Other independent agencies will provide written statements and materials for the committee's review. As usual, no hearings with public witnesses will be held, but testimony may be submitted in writing. The subcommittee staff indicate that guidelines for submitting such testimony should be available next week; the deadline for submittals will probably be mid-April.

## ANTIQUITIES ACT BILL(S) INTRODUCED

On February 5 Rep. Helen Chenoweth (R-ID) introduced H.R. 596, a bill that would amend the Antiquities Act to prohibit further extension or establishment of any national monument without an express Act of Congress. This is in addition to several state-specific versions of the bill that have also been introduced, including H.R. 413 by Rep. Hastings (R-WA) that focuses on Washington state and H.R. 597 by Rep. Chenoweth that

focuses on Idaho. In the Senate, S. 62 by Senators Craig and Kempthorne (R-ID) prohibits further extension or establishment of any national monument in Idaho. As noted in last week's report, Rep. Chenoweth now chairs a forest subcommittee on the House Resources Committee. Although no hearings have been announced, it is likely that such hearings would probably be held jointly with the national parks and public lands subcommittee, chaired by Rep. Hansen (R-UT).

## SUPREME COURT TO HEAR PRESERVATION LAW SUIT

Wednesday, February 19, the Supreme Court heard oral arguments on a suit that pits historic preservation laws and ordinances against the federal Religious Freedom Restoration Act (RFRA). The suit involves the town of Boerne, (pronounced Bur-nee) Texas, and a 73 year old mission-style church which the Catholic Church wants to enlarge by demolishing all but the facade to accommodate the increased numbers of parishioners who worship there. Under a local preservation ordinance, the city of Boerne denied its application to demolish and reconstruct the church. The Church challenged the city's right to deny the demolition permit mainly because of RFRA's requirement that the government offer a "compelling justification" if governmental action imposes a "substantial burden" on religious activity. A lower court found RFRA unconstitutional; the Court of Appeals reversed the decision. The National Trust for Historic Preservation has filed an amicus brief on the matter, urging the court to overturn the Appeals Court's decision on the grounds, among

other things, that the denial of the demolition permit does not penalize any religiously motivated activities. The brief notes that the city tried to work with the church to accommodate their needs, without destroying the current structure.

## HOUSE NAGPRA BILL INTRO- DUCED; SENATE STILL IN LIMBO

Senate Indian Affairs Committee staff state that they don't know if Senator Inouye (D-HI) will push for a hearing on S. 110, his bill to amend the Native American Graves Protection and Repatriation Act. They note that an almost identical bill passed the Senate last year without committee hearings. Much of the decision will be up to Committee Chairman Ben Nighthorse Campbell (R-CO). Campbell has not signed on as a cosponsor to S. 110.

On February 13, Rep. Neil Abercrombie (D-HI) introduced H.R. 749, amendments to NAGPRA. No copies are available and the bill isn't up on the Internet yet, but when it is, it can be accessed at <<http://thomas.loc.gov>>

Since the bill was just introduced, no hearings have been scheduled yet. Staff for the Resources Committee indicate that they are sympathetic to the issue but realize that it could cause major problems for federal projects due to the consent provisions.

According to National Park Service staff, the administration has not been asked for formal comments as yet, although they feel the bill has some problematic sections. Part 1(a) requires consent from tribes or descendants before removal of remains for study. The Justice Department will probably determine this section unconstitutional since it

would allow a private citizen to unilaterally stop a legal federal activity. Section 1(b) is also problematic since it requires consent from "each appropriate tribe" rather than "the appropriate tribe" as in last year's amendment. This has the potential to stop many federal projects if land managers are unable to gain unanimous consent from all affected tribes.

The amendment includes two recommendations proposed last year by NPS. One authorizes the review committee to deal with culturally unidentifiable associated human remains. The second, allows money assessed as part of civil penalties to go to the Secretary of Interior for use in enforcement. According to NPS staff, the Office of Management and Budget (OMB) opposes the latter since OMB prefers penalties to go to the general treasury. An additional amendment may be needed to exempt from Freedom of Information Act requests for information on sacred site gained under consultation.

By Loretta Neumann, CEHP Incorporated

## ACRA Labor Relations Committee Update on Wage Determination Issue

18 February 1997

At ACRA's annual meeting in Sacramento, the membership was told that revised position descriptions defining a three-tiered Archaeological Technician job category was pending publication by the Department of Labor (DOL). At the meeting members were informed that the DOL was significantly tardy in its publication of these revisions and the Labor Relations Committee requested that the membership solicit help from Congressional representatives to move the process forward. Although many of you were successful in getting your representatives to send letters to the DOL, the process has stalled, again. The following is a brief recap of the situation and our current status.

In May, representatives of the USFS met with the DOL to present revised position descriptions for Archaeological Technician. At the meeting DOL accepted the revised position descriptions presented by the USFS and indicated that the DOL intended to have them in place by 1 August 1996. A letter was issued by the DOL in June in which they went on record stating their agreement with the proposed conformance. In August, the USFS submitted revised position descriptions to the DOL. The revised position descriptions recognize three levels of Archaeological Technician and there is an implication that the three levels generally correspond to the construct of crew member, crew chief, and field supervisor. The USFS also attached federal wage grade equivalents to each of the position descriptions ranging from GS-4 to GS-6/7.

In October, representatives of the USFS and the DOL spoke about the status of the new classifications. Although the DOL was in agreement with the USFS in terms of the classification changes, the DOL was working on the personnel grade equivalent for the category and indicated that the issue would be cleared up by January. As of January, the DOL had let 6 months lapse while federal agencies and

small businesses continued to struggle with an inability to engage in a viable contracting process.

On 7 January 1997, the UAFT met with the DOL to express their concern and dissatisfaction over the proposed three-tiered descriptions for Archaeological Technician. At that meeting the DOL told UAFT that they were to contact the USFS and come to some agreement about their differences. Apparently the DOL gave UAFT a limited time (approximately 1 March) to come to an agreement.

The USFS has arranged to meet with the UAFT on Friday morning, 21 February, to hear their concerns. Although details are very sketchy, it seems that the UAFT is proposing a two-tiered system in which the top tier is paid at the rate of the current wage determination and the lower tier is paid \$1/hr less. The UAFT will be represented at this meeting by UAFT officers as well as the business agent for the International Brotherhood of Operating Engineers (the UAFT is a local of the IBOE). Apparently the UAFT will also be bringing to the meeting two consultants who support their position. The meeting will also be attended by representatives of the U.S. Army Corps of Engineers (USACOE) and possibly other federal agencies, but not the DOL. ACRA's Labor Relations Committee has arranged a separate meeting with the USFS and USACOE (and possibly other agencies) on Friday afternoon, 21 February, to reiterate ACRA's position with regard to the three-tiered position descriptions and the need to bring Archaeological Technician wage determinations in line with regional market rates.

It does not look like there will be any near-term relief from the wage determination situation. ACRA's Labor Relations Committee will continue to keep the membership informed about developments in this situation.

W. Kevin Pape, Chairperson

### Advertising Space Available

ACRA Edition offers advertising space to our members. Does your company have a special product, service, or publication that would be of interest to some aspect of the CRM community? Why not consider placing an ad in ACRA Edition?

Advertising Rates:	Per 6 Months	Per Year
Business Card size (3.5"x 2")*	\$100.00	\$175.00
1/4 page (3.5"x 4.75")	\$200.00	\$350.00
1/2 page (7.0"x 4.75")	\$300.00	\$525.00

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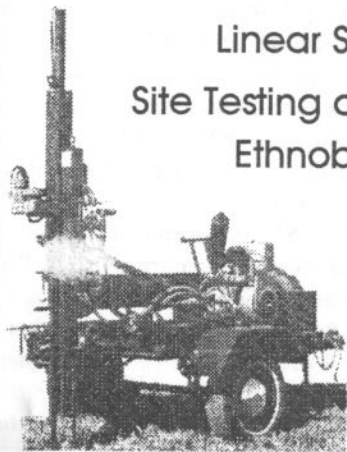
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*ACRA Edition* is a monthly publication of the American Cultural Resources Association. Our mission is to promote the professional, ethical, and business practices of the cultural resources industry, including all of its affiliated disciplines, for the benefit of the resources, the public, and the members of the association.

This publication's purpose is to provide members with the latest information on the association's activities and to provide up-to-date information on federal and state legislative activities. All comments are welcome. Please address comments to:

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