

Guide for the Use of Technical Assistants in Cultural Resource Activities

Oregon/Washington BLM

Region 6 Forest Service

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Draft

Background

Use of paraprofessional assistants became a part of the Bureau of Land Management (BLM) and Forest Service (FS) heritage programs at their inceptions in the mid-1970s. These adequately trained and experienced agency cultural resource assistants, also known in the Pacific Northwest as Cultural Resource Activities (CRAs) and Cultural Resource Technicians (CRTs), have on occasion assisted cultural resource specialists in carrying out certain field survey tasks. Cultural resource specialists, such as a Forest Archaeologist or a BLM District Archaeologist, are professional archaeologists, historians, or persons formally trained in related fields who conform to OPM and regulatory personnel requirements. These professionals play key roles in agency conformance with cultural resource programmatic agreements established within the states of Oregon and Washington.

The CRAs/CRTs are agency employees who have primary job responsibilities in other fields but who are trained to assist cultural resources professional staff in the recognition and protection of heritage resources. It is required that assistants complete formalized training programs offered by their respective agencies, maintain their certifications as assistants, and work under the direction of a qualified professional agency cultural resource specialist. These assistants are different from archaeological technicians, such as those in the GS102 series, who have more formal academic training and can perform more independently under the direction of the agency cultural resource specialist.

Over the past thirty years, use of assistants has become more problematic. Compliance surveys have become more complicated with the continued advances in the field of archaeology; legal requirements have increased, including identification of tribal concerns in proposed project areas; use of complex analyses and databases are being implemented; and the likelihood of appeals and lawsuits has increased. The need for assuring a professional quality of work has grown to ensure the performance of legally defensible compliance work. Through the standards provided below, we can better ensure that fragile, nonrenewable heritage resources are being adequately protected and managed and that we are maintaining our reputation for highly professional and credible work.

Standards

Agency personnel who are not cultural resource specialists but who are adequately trained and experienced may participate in cultural resource work under the direct supervision of agency cultural or heritage resource specialists. These non-professional CRAs or CRTs may (a) assist in inventorying project areas under the direct field supervision of a cultural resource specialist; (b) assist specialists in conducting cultural resource work such as site mapping, photographing, stabilizing, signing, conducting informant interviews, and monitoring to detect and deter vandalism; (c) perform project implementation monitoring; and (d) be used to independently inventory small project areas of low cultural resource sensitivity using the following guidelines:

Procedures for Field Use

1. Assistants will work only under the supervision of a qualified cultural resource specialist. The use of an assistant will be at the discretion of the agency cultural resource specialist who assigns assistants to particular projects.
2. Assistants will neither substitute for cultural resource specialists when the specialists are absent nor be considered adequate replacements for seasonal or term cultural resource employees. Assistants may not direct others participating in inventory work.
3. A cultural resource specialist, once informed of a project location, will examine the existing records for the area and determine whether there are likely to be cultural resources including properties of traditional religious and cultural importance (commonly referred to as TCPs) that would require the presence of a professional.
4. The cultural resource specialist will determine whether field inventory by an assistant would be appropriate or whether the project area should be examined by a cultural resource specialist. Factors to be considered in this decision include the amount of training and experience of the assistant and the size and sensitivity of the project area. Generally, independent field work by assistants under the direction of a cultural resource professional will be limited to survey areas less than 40 acres in size or, in the case of linear projects, less than four miles in length outside of locations of high cultural sensitivity.
5. If use of an assistant is determined appropriate, the assistant, following the direction of the cultural resource specialist, may conduct the field inventory and document his/her findings, including initial recordation of all cultural resources identified and a survey report describing the nature of the survey strategy. On a selected basis, the cultural resource specialist will follow up with a field inspection and ensure that thorough recordation of the cultural resource sites found was accomplished. For small projects in low cultural resource probability areas, direction by the cultural resource specialist will include: (1) assigning specific fieldwork; (2) monitoring and approving the assistant's fieldwork results; and (3) assuming professional responsibility for the assistant's work. For larger survey areas (greater than 40 acres or 4 miles in length), direct field supervision is necessary.
6. If the assistant identifies no cultural resources and the cultural resource specialist accepts this assessment, the cultural resource specialist will approve and sign the cultural resource project record.

Monitoring of Assistant Activities

1. The cultural resource specialist may identify certain geographic areas which, because of sensitive or hard-to-recognize cultural resource values, require the presence of a cultural resource specialist for field examination.
2. When cultural resources are identified, a field examination by the cultural resource specialist will normally be required unless the cultural resource specialist is confident with the field abilities of the assistant. The cultural resource specialist will be responsible for evaluating all resources and,

in cases of adverse effect, recommending mitigation measures, writing a final report, and ensuring compliance with relevant statewide agreements with the state in all instances where an assistant records cultural resources. The cultural resource specialist is also responsible for assisting the appropriate line officer with tribal consultation when cultural resource issues are involved.

3. All assistants' work must be approved in writing by a cultural resource specialist before being used as a basis for management decisions and compliance with Federal laws and prior to inclusion in cultural resource record systems or databases.
4. If an assistant does not perform at an acceptable level, the assistant will be relieved of cultural resource duties at the request of the specialist.
5. If an assistant does no cultural resource work within a calendar year after being trained, he/she must be retrained to the satisfaction of the cultural resource specialist before performing any further cultural resource work.
6. The cultural resource specialist must evaluate the performance of all assistants each year. Important elements in the evaluation will be the overall quality of the assistants' reports, compliance with general and specific instructions, and evidence that the assistants are finding and accurately reporting whatever cultural resources exist in the areas inventoried. The results of the annual evaluations will be documented by the cultural resource specialist in memorandums to the appropriate line officers and will include recommendations for additional training, if necessary, or dismissal from the program.

Training

1. Assistants shall be selected jointly by the cultural resource specialist and the line officer. Candidates should have not only an interest in archaeology and history but must be willing to commit time and effort to training and to completion of those program assignments they receive. In addition, supervisors must be willing to provide the candidates with adequate time and make the employees available to develop necessary skills and perform the assigned tasks. The additional responsibilities of cultural resource assistants should be included in their annual employee performance plans.
2. Training shall be provided by the appropriate Forest Supervisor Office or BLM District Office and should include sufficient field time to enable the specialist to feel comfortable with allowing assistants to undertake independent field inventories. One day of classroom instruction followed by a minimum of four days of field instruction will be required. Training will include the following objectives:
 - Basic cultural resource recognition;
 - Basic inventory techniques and site identification procedures;
 - Completion of site records and inventory reporting documents including project records, photograph logs, and other forms as appropriate;
 - Familiarization with legal and regulatory authorities and agency policies and manuals;
 - Familiarization with the historic contexts of the appropriate regions;
 - Recognition of basic artifact classes and archaeological features; and

- Knowledge of specific cultural resources of major significance within the field office administrative area.

3. Training sessions will necessitate allocation of sufficient funds by the field unit to address expenses of the cultural resource specialist(s) serving as trainer(s) and the selected trainee(s). Funding is to be provided by those programs proposing to use assistants to assist cultural resource specialists in the review of their proposed projects.

4. Retention of qualifications as an assistant requires that an individual attend an annual cultural resource refresher training session on his/her unit (see #5), that he/she is current with the developments in the field, and that he/she demonstrate an ability to apply this knowledge by completing a minimum of one acceptable survey project, including the resulting report, every year following a formal training course.

5. The assistant is required to complete an annual refresher training session under the direction of the cultural resource specialist. The refresher course would include an update of all new developments in the region pertaining to the assistant's work and, if needed, a field exercise to ensure the quality of survey work and maintain site and artifact recognition skills. The assistant can also fulfill this requirement by attending relevant courses offered by colleges and universities as well as other training sources as approved by the cultural resource specialist.