Preserving America's Heritage

ADVISORY COUNCIL ON HISTORIC PRESERVATION
BUDGET ESTIMATE
FY 2021

September 2019

An independent federal agency, the ACHP promotes the preservation, enhancement, and sustainable use of our nation's diverse historic resources and advises the President and Congress on national historic preservation policy. It also provides a forum for influencing federal activities, programs, and policies that affect historic properties. The ACHP promotes historic preservation to foster the understanding of the nation's heritage and the contribution that historic preservation can make to contemporary communities and their economic and social well-being.

The Honorable Aimee K. Jorjani of Falls Church, Virginia, is chairman of the 24-member council, which is served by a professional staff with offices in Washington, D.C. For more information about the ACHP, contact:

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ADVISORY COUNCIL ON HISTORIC PRESERVATION BUDGET ESTIMATE, FY 2021

FY 2021 Request

The Advisory Council on Historic Preservation requests
$6,650,000 and 34 FTE

Alternative: The Advisory Council on Historic Preservation requests
$7,992,000 and 38 FTE

SUMMARY

FY 2021 Summary

Under the leadership of its newly confirmed full-time chairman, the Advisory Council on Historic Preservation (ACHP) will do the following:

- Manage the federal historic preservation review and consultation process under Section 106 of the National Historic Preservation Act (NHPA) in an effective and efficient manner that fully engages stakeholders and the public to find creative solutions to conflicts between preservation and other needs;
- Promote historic preservation as a strategy for addressing national infrastructure improvement goals identified and advanced by the Administration and Congress;
- Promote federal programs and policies that leverage the benefits of preserving historic buildings for community revitalization and economic growth, addressing development in Opportunity Zones, creation of affordable housing, and reducing the shortage of skilled preservation craftsmen in the construction trades;
- Address the need for more uniformly available digital tools, including geographic information systems (GIS), to improve planning for federal projects by making information about the location of identified historic properties more readily available;
- Develop Section 106 program efficiencies to support the streamlining goals of Executive Order 13807, "Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects;"
- Provide timely expert advice to the President, the Congress, and the executive branch on national economic, energy, community development, resource management, and environmental policies and priorities;
- Participate in the emergency response to and longer range recovery from natural disasters;
- Promote and implement recommendations for improving the national historic preservation program identified in 2016 during the 50th anniversary of the NHPA;
- Develop the ACHP's 2021 report to the President on federal stewardship of historic properties, as required by Executive Order 13287, and work with federal agencies to implement the report's recommendations;
- Work with partners to raise awareness about the importance of historic preservation, promote the value and relevance of cultural heritage and the benefits of historic preservation in contemporary society, work to engage new audiences, including the next generation of preservationists, and

strive to build a more inclusive preservation program that embraces all citizens and their diverse ethnicities, cultural backgrounds, and experiences; and

- Provide the training, guidance, information, and other tools necessary to address these needs.

The ACHP's FY 2021 request is presented with two alternatives. The first represents conformance with Office of Management and Budget (OMB) guidance directing submission of a budget with a five-percent decrease ($350,000) from the FY 2020 President's budget request of $7,000,000. This level ($6,650,000) will necessitate staff reductions, impact addressing cybersecurity threats, and constrain the ACHP's operations in other important ways including its ability to support Presidential initiatives such as infrastructure and energy development. The second alternative presents a request for the resources necessary to maintain current FY 2019 level of operations, meet increased demands in the Section 106 area, and address continually increasing IT modernization and cybersecurity requirements. The alternative estimate ($7,992,000) represents an increase of $992,000 over the President's FY 2020 request.

FY 2021 Direction and Request

At the outset, it should be noted that the ACHP is in the midst of developing a new strategic plan. The ACHP had been awaiting the Senate confirmation of its first full-time chairman to start the process. That occurred on June 27, 2019, and the chairman officially came on board in July. The ACHP membership had taken initial steps in evaluating the existing plan, and the fundamental principles undergirding that plan will continue to guide the ACHP's programs and operations. As the plan is finalized later this year, the strategic goals, priorities, and specific initiatives will be further refined, but are expected to be consistent with the FY 2021 direction set forth below.

The ACHP has made responding to the Administration's infrastructure initiatives a top priority. The agency is uniquely positioned to develop efficiencies for the Section 106 review of federal and federally assisted projects and improve environmental reviews for infrastructure projects through better coordination among Section 106, the National Environmental Policy Act (NEPA), and other environmental statutes. Likewise, focusing on energy extraction and transmission projects, addressing federal agency mandates to reduce the federal real property footprint, promoting the development and use of digitized historic property information and Section 106 processes, and improving early coordination with Indian tribes and Native Hawaiian organizations (NHOs) will continue to be significant goals in the ACHP's work. Using the ACHP's authority under its government-wide regulations that implement Section 106, the agency has a variety of tools to adapt the review process to meet the needs of individual federal programs. Recent experience has clearly demonstrated the value of their application.

Since 2012, the ACHP has played an important role in Administration efforts on improving the delivery of infrastructure projects, providing policy recommendations and guidance as a member of the Steering Committee that implemented the requirements of Executive Order 13604, "Improving Performance of Federal Permitting and Review of Infrastructure Projects," as a member of the Federal Permitting Improvement Steering Council (Permitting Council) established by Title 41 of the Fixing America's Surface Transportation Act of 2015, and as a signatory to the April 2018 Memorandum of Understanding Implementing One Federal Decision Under Executive Order 13807, "Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects" (OFD MOU).

The ACHP will continue to advance Permitting Council goals by developing Section 106 program efficiencies, promoting the digitization of information to better inform Section 106 reviews and project planning, tracking and expediting environmental reviews for infrastructure projects listed on the Permitting Dashboard, and promoting use of NEPA-Section 106 integration strategies contained in the

handbook jointly issued by the Council on Environmental Quality (CEQ) and the ACHP (https://www.achp.gov/sites/default/files/2017-02/NEPA_NHPA_Section_106_Handbook_Mar2013_0.pdf). The ACHP is also a member of the Broadband Workgroup, where it is working with other federal members to identify further efficiencies and improvements to environmental review procedures for broadband projects, particularly those that serve rural America.

Recognizing the importance of ensuring that information about historic properties is readily available to project planners, the ACHP established a Digital Information Task Force in the fall of 2018. Formation of the Task Force addresses the need for more uniformly available digital tools, including GIS, to improve planning for federal projects by making information about the location of identified historic properties more readily available. Such information can also provide a platform for development of preservation outcomes. Access to better information will contribute significantly to current government-wide efforts to improve the efficiency of environmental reviews, including Section 106 reviews, for infrastructure projects. In FY 2020 the Task Force will recommend to the membership an action plan that will include steps the ACHP and other stakeholders can take to improve the availability of this information, and the ACHP will work to implement this plan in FY 2020 and FY 2021. Committing staff time and other resources to coordinate responses to this issue is important to address a longstanding concern with relevance to providing better planning information for infrastructure development decisions.

Information technology can also expedite the Section 106 process and make it more transparent and accessible to participants and the public in other ways. In 2013, the ACHP initiated its voluntary Electronic Section 106 Documentation Submittal System (e106) for use by federal agencies when carrying out their Section 106 responsibilities. The e106 system is designed to improve the efficiency, effectiveness, and transparency of the Section 106 review process by providing federal agencies with an electronic submittal system that expedites critical steps in Section 106 review and encourages complete and accurate submissions that can be shared with others. Improving the system and encouraging complementary systems at the state and tribal level will be pursued with available resources.

An important component of the ACHP's infrastructure efforts has been improving the involvement of Indian tribes and NHOs in the Section 106 process, as large energy and infrastructure development projects impact traditional cultural properties on an unprecedented scale. These initiatives will advance Administration goals to improve environmental reviews of such projects.

To advance improved tribal involvement in infrastructure projects, the ACHP began advocating for early coordination with Indian tribes by applicants and federal agencies in pre-application studies and information gathering. Such earlier coordination often leads to better preservation outcomes and more predictable Section 106 reviews. In 2019, the ACHP launched an e-learning course for federal agencies and applicants to assist them with early tribal coordination. The ACHP also issued a handbook for federal agencies, applicants, and Indian tribes with recommendations regarding more effective pre-application communication and coordination. The handbook was developed with input from industry groups, Indian tribes, and permitting agencies.

The ACHP also is assisting the Permitting Council in implementing a government-wide tribal contact database to help agencies meet their tribal outreach responsibilities. Due to the removal of most Indian tribes from their ancestral homelands where many properties of traditional religious and cultural significance to them are located, federal agencies and applicants are often challenged in identifying the tribes that federal law requires them to consult. A government-wide database showing the areas of interest to tribes and providing up-to-date contact information can facilitate early consultation with tribes and deliver significant efficiencies in the Section 106 process. The

Department of Housing and Urban Development has created a useful tool, and the ACHP is working with the Permitting Council to refine it.

In 2019, the ACHP offered more training for Indian tribes, in partnership with other federal agencies, in an effort to ensure tribes are fully prepared to participate in the Section 106 review process. It has been shown that well-prepared participants lead to more efficient Section 106 reviews. The ACHP's efforts in this area will continue to expand in FY 2020 and, dependent upon funding, in FY 2021.

In supporting the goals of Executive Order 13807 and the OFD MOU, the ACHP is actively advancing the use of Section 106 program alternatives to increase the efficiency and effectiveness of historic preservation reviews for a variety of infrastructure sectors. The OFD MOU includes an important role for the ACHP and other Permitting Council members in managing timelines for environmental reviews and coordinating federal reviews for infrastructure projects. Recent programmatic approaches developed by the ACHP have tailored the review process, including the ACHP's issuance of a Program Comment for rail and transit rights-of-way for surface transportation that exempts many activities from Section 106. This will bring significant efficiencies to the delivery of federal assistance for improvements to the nation's 140,000 miles of freight rail lines as well as hundreds of transit systems and Amtrak. The ACHP also recently issued a Program Comment to the Department of Veterans Affairs (VA) to address VA's real property actions related to the reduction of vacant and underutilized properties in its inventory. The Program Comment establishes efficiencies and an expedited review process for many real property actions related to the transfer of property rights of vacant and underutilized buildings, structures, and land, including leases, sales, transfers, and demolitions, as well as for certain maintenance and repairs of such properties.

The ACHP also worked closely with the Department of Agriculture's Rural Utilities Service (RUS) and the National Conference of State Historic Preservation Officers to execute a nationwide Programmatic Agreement that better aligns RUS' granting procedures with the Section 106 review process. This nationwide agreement allows RUS to obligate billions of dollars of funds appropriated for housing, sewer, water, electric, and broadband projects in rural and tribal communities while preserving appropriate opportunities for the Section 106 review process to inform RUS' consideration of their impacts to historic properties.

Program alternatives provide the ACHP with the ability to tailor the standard Section 106 review process established in the ACHP's government-wide regulations to meet the needs of a particular agency program. They are created in collaboration with the responsible federal agencies and with the engagement of stakeholders and the public. Over the years, these have been successfully applied to a wide variety of programs, providing carefully crafted approaches to improving the efficiency of agency project delivery and focusing reviews on the highest value cases.

The interest among federal agencies in developing program alternatives to create efficiencies will continue to grow. Indeed, indications are that demand will dramatically expand in FY 2020 and FY 2021. Nationwide program alternatives already in the early stages of development and that will require further action by the ACHP in FY 2020 and FY 2021 include the following:
-a Program Comment for the Department of the Navy regarding the modernization of shipyards;
-a Program Comment for the Bureau of Reclamation for water irrigation systems in the West;
-a nationwide Programmatic Agreement and Program Comment for the US Forest Service regarding forest management activities and the disposal of facilities;
-program alternatives for the National Park Service (NPS) addressing its maintenance backlog and facilities management; and
-development of program alternatives with the Federal Communications Commission regarding "Twilight Towers" (those for which there is no evidence of Section 106 compliance) and 5G wireless communication facilities.

Other program alternative requests are expected in the coming years as well, as federal agencies recognize the efficiencies they provide, and all participants in the Section 106 process acknowledge their value in simplifying routine reviews. The ACHP will collaborate with agencies to the extent that available resources permit and seeks to expand its capacity for this work in FY 2021.

While the ACHP has pursued coordination with federal agencies to develop Section 106 review efficiencies for their specific programs, it has also reached out to industry for opportunities to address issues on a sector basis. The ACHP has engaged the energy transmission industry, representing a key group of applicants for federal permits and authorizations for large-scale infrastructure deployment, and the cultural resources contractors who support their projects in a Working Group on Section 106 and Infrastructure Projects during FY 2018 and FY 2019. The efforts of this Working Group are leading to initiatives to improve the performance of permitting agency reviews, notably the Federal Energy Regulatory Commission and the Army Corps of Engineers, that will be pursued in FY 2020. The Working Group was the precursor to the current Digital Information Task Force, which has an advisory group that also draws participants from industry and cultural resources contractors along with state, tribal, and local preservation officials.

Training is a critical component of improving the efficiency of the federal historic preservation review process. The ACHP will continue to renew and expand its training efforts in FY 2020, including three new on-site courses offered around the country to participants who benefit knowing more about the Section 106 review process. The ACHP will also continue to expand its commitment to distance learning, recognizing that budget and travel restrictions in other agencies limit participation in the ACHP's publicly available on-site training opportunities. Distance learning is lower in overall cost to both the ACHP and participants, although it does require up-front development costs. Introduced in FY 2013, the ACHP's web-based training continues to grow in popularity and is anticipated to reach 2,000 participants in FY 2020 and an even larger number in FY 2021 (dependent upon funding). In late FY 2017, the ACHP launched its on-demand training platform and anticipates reaching a broader constituency that may desire to avoid the travel and cost of on-site training. Further development of more on-demand courses and keeping pace with technological developments in FY 2021 will be dependent upon available resources.

While distance learning will be the priority in future years, at the same time there continues to be an increase in requests for special, tailored on-site courses from individual agencies. The ACHP anticipates the demand to continue to rise in FY 2021. Federal agencies support the development and delivery of these courses, but the ACHP contributes its resources in partnership with the agencies, so the capacity to meet agency needs will be dependent upon funding and staffing levels.

In FY 2021, the ACHP will continue to pursue program improvements that support federal land and property managing agencies in their efforts to identify, use, and protect historic properties as required by Section 3 of Executive Order 13287. ACHP actions will include implementing the recommendations made within the ACHP's 2018 Section 3 Report to the President entitled *In a Spirit of Stewardship* regarding Section 106 reviews on infrastructure projects, encouraging public-private partnerships, and strengthening leasing authorities. The implementation of this plan will focus in 2020 on the formation of a workgroup to address the need for guidance and best practices on using authorities under Section 111 of the NHPA to encourage the leasing and use of federally owned historic buildings. This can provide agencies with cost-effective options to meet "reduce the footprint" mandates while promoting historic preservation goals. The ACHP also anticipates updating and reissuing guidance to federal agencies on completing the next round of federal agency progress reports due to the ACHP in September 2020, and will be developing and issuing its mandated triennial report to the President on the federal stewardship of historic properties in February 2021.

The ACHP also will continue to advise the Administration and the Congress on legislative, regulatory, and administrative policies that affect or enhance historic preservation interests. The agency will offer its

expertise on strategies to effectively combine preservation and heritage with other national goals and cooperate in the joint development and implementation of such initiatives. In those efforts the ACHP continues to work toward its established goal of supporting a preservation program that is inclusive and responsive to the public, expanding its use of social media to connect with an increasingly diverse and technologically sophisticated constituency.

The ACHP has been pursuing a number of policy initiatives to address important national preservation issues, including disaster preparedness and recovery, and broadening public engagement in the national historic preservation program. As recent events demonstrate, natural disasters often cause significant damage to historic resources, and how federal response, recovery, and preparedness actions are planned and conducted is a significant factor in minimizing and mitigating such impacts. The Sandy Recovery Improvement Act (SRIA) of 2013 directed the President to establish an expedited and unified interagency federal review process. A steering committee comprising CEQ, Department of Homeland Security, Federal Emergency Management Agency (FEMA), and the ACHP developed the process and now coordinates with a broader group of federal agencies to improve the delivery of post-disaster recovery assistance. This Unified Federal Review (UFR) process expedites approvals and release of federal funding to applicants as they recover from disasters and emergency situations.

Other national policy areas will be on the ACHP's agenda. The ACHP will continue to follow up on its recommendations for program improvement that emerged from its policy review of the National Historic Preservation Program conducted as part of the 50th anniversary of the NHPA in 2016 (https://www.achp.gov/sites/default/files/documents/2018-06/Preservation50FinalReport.pdf). These recommendations span the range of challenges and opportunities before the national program and offer a variety of short- and long-term actions that can help fulfill the promise of the NHPA. The ACHP's current strategic planning effort will provide further guidance on which of the policy recommendations will be prioritized. Funding levels for FY 2021 will affect how well the ACHP can pursue them.

The ACHP will continue to promote historic preservation as a tool for community revitalization, economic development, and public education, supporting the Administration's goals in those areas. The ACHP will seek to provide advice to two recently established White House councils dealing with these subjects. The White House Opportunity and Revitalization Council addresses community revitalization with special emphasis on Opportunity Zone redevelopment. The White House Council on Eliminating Regulatory Barriers to Affordable Housing is focused on promoting the creation of affordable housing. Preserving historic buildings plays a significant role in community revitalization and economic growth and has been an effective tool for providing affordable housing in cities across the country. The ACHP will work to build a relationship with these two councils and explore with federal agencies how their policies and programs can leverage these benefits.

In fulfillment of its statutory charge to encourage public interest and participation in historic preservation, the ACHP will continue its efforts to engage youth in historic preservation and to build a more inclusive preservation program. Much of the ACHP's recent work has focused on youth engagement, and that will continue in FY 2021 to the extent resources are available. In 2018, the ACHP launched a successful program in conjunction with NPS and the National Trust for Historic Preservation (NTHP) as part of the White House Initiative on Historically Black Colleges and Universities (HBCUs). Drawing on the rich cultural legacy of HBCUs, the initiative strives to bring more African American young professionals into historic preservation and other related fields. It creates opportunities to teach students heritage craftsmanship skills, trades, and other tools that lead to successful careers in architecture, urban planning, construction, and other career fields. The ACHP, working with its partners, plans to expand from the current program at two HBCUs to three in 2020. The ACHP's goal is to establish model approaches that can be adopted by others to implement in the future and explore similar related programs with federal agencies, such as the Department of Education, connected to community colleges. A similar approach was taken in the past with the development of historic preservation youth summits, a program

successfully adopted by a nonprofit organization with support from NPS.

The ACHP also has made special efforts in Indian Country, continuing to host a Native youth Facebook page and developing a partnership with Salish Kootenai College (SKC), the only tribal college or university with degree programs in tribal historic preservation. In 2019, the ACHP formalized its partnership with SKC by entering into a Memorandum of Understanding that creates opportunities for SKC students to learn from and work with preservation professionals. This work will continue in FY 2020 and, if resources are available, in FY 2021 with increased emphasis on encouraging federal programs to support career development in the preservation field.

In the related but equally important field of preservation crafts, the ACHP intends to explore how federal policies and programs can help train skilled preservation tradespeople. This effort is intended to help reduce the nationwide shortage of workers skilled in preservation work in the construction trades and provide stable, well-paying jobs. The ACHP is uniquely positioned to work with members such as the Department of Education, other federal agencies such as the Departments of Labor and Commerce, and the private sector to advance the goal of economic opportunity while helping to preserve historic properties.

Information technology has assumed an increasingly prominent role in the ACHP's work and requires continued investment to meet IT modernization and cybersecurity challenges to provide the necessary tools to carry out program activities. In conformance with the President's Management Agenda, the agency is focused on providing modern information technology as the foundation of how the ACHP serves its constituency securely and efficiently. Achieving this goal requires utilizing cutting edge technology and replacing legacy infrastructure using modern cloud-based solutions where possible to enhance IT service effectiveness and reduce cybersecurity risks.

Providing online access to information and technical assistance assumes increasing importance for improving Section 106 efficiency and trying to reach more diverse audiences in a cost-effective manner. The ACHP's online efforts, including the website, e-communications, and social media platforms, provide many benefits for the public, federal partners, and the agency. The ACHP recognizes the importance of a broad range of strategies for communication and is aware that online communication and social media allow it to ensure transparency while increasing reach and reducing printing and distribution costs. A digital web analytics program was established in FY 2019 to monitor and improve the quality and efficiency of digital services.

At the same time, the increase in cybersecurity threats, the corresponding spate of legislative and Administration directives, and the need for replacing legacy equipment have placed significant financial burdens on the ACHP. In response, the ACHP has undertaken a multi-year program to address the issues. Investments in FY 2018 and FY 2019 were essential to advance the effort but have not been sufficient to meet the challenges of the ever-changing threat environment and legal directives. FY 2020 budget funds will be allocated to meet existing requirements of the National Institute of Standards and Technology (NIST) Cybersecurity Framework areas, Executive Order 13800, the President's Management Agenda's Modernizing IT Cross-Agency Priority (CAP) Goal, and the OMB M-17-09 and Department of Homeland Security (DHS) Cybersecurity directives for securing High Value Assets (HVAs). The implementation of the new cybersecurity capabilities established in recent years resulted in measurable improvements in the ACHP's security posture as noted in the agency's Risk Management Assessments and Federal Information Security Management Act (FISMA) submissions. However, this also has increased ongoing maintenance costs, presenting a deficiency in funding to cover all IT security and fundamental infrastructure maintenance costs in FY 2019 and presumably in FY 2021. While $305,000 was requested in the FY 2020 estimate, only $70,000 was provided in the President's budget.

In FY 2018, IT equipment contracts that included maintenance as part of the initial purchase in 2014 ended, requiring new maintenance contracts with new costs. Compromises were made to balance spending for equipment maintenance and cybersecurity functions, so some maintenance contracts lapsed. While necessary from a budget standpoint, this was not desirable and introduced additional operational and cybersecurity risks, as systems were unable to receive patches or repairs as needed. FY 2020 funds will allow the restoration of these essential contracts, reducing the risks to the IT infrastructures and agency HVAs. The ability to continue this approach in FY 2021 will be determined by the availability of adequate funding.

Due to the investments made in cybersecurity improvements, ongoing improvements in the ACHP's Risk Cybersecurity Risk Management Assessments have been made possible by prioritizing reduction of cybersecurity capability gaps. FY 2019 funding allowed substantial increases in cybersecurity capabilities, but FY 2020 funding may not enable the ACHP to maintain this momentum. Further progress in FY 2021 will be dependent upon available funding.

All four Risk Management Assessment security domain ratings, "Identify," "Protect," "Respond," and "Recover," are being actively targeted for improvement in FY 2020 and FY 2021 to achieve "Managing Risk" ratings. Achieving these goals will be a multi-year effort, extending through FY 2022. The goal is to improve the agency's cybersecurity capabilities, maintain the technology infrastructure, and make the necessary progress to improve the risk assessment ratings and reduce the agency's cybersecurity risks by fully implementing the NIST Cybersecurity Framework. These efforts will progress with FY 2019 funds that were augmented by the Congress in the final appropriation and continue into FY 2020 to the extent funding is available. These will be recurring costs through FY 2021, and additional progress will be dependent upon funding levels.

For FY 2021, there are anticipated capital expenditures for managing and addressing the lifecycle of IT systems hardware. By mid-2019 the end of systems life cycles for networking, storage, and computing have been reached. This will ultimately require a projected capital investment of $420,000 to complete a one-for-one replacement of all the end of life equipment over multiple fiscal years. The ACHP anticipates distributing these expenses over a multi-year period, and funds provided in the FY 2019 budget are being used to begin a limited replacement. The level of activity for FY 2020 will be dependent upon final budget figures. For FY 2021, additional funds are needed to continue replacement of legacy equipment and agency continuity of operations infrastructure, so the availability of funds will determine what can be achieved in FY 2021. During FY 2020, the ACHP is also required to transition from the expiring Networx telecommunications contracts to the Enterprise Infrastructure Solutions (EIS) contracts, requiring an increase in service and transition costs to improve agency connectivity, resiliency, and security. Some of these recurring cost increases will carry over into FY 2021.

Budgetary History

The FY 2019 appropriation for the ACHP was $6,890,000. Figure 1 shows the recent funding background for comparison.

Figure 1. Budgetary History, FY 2018-2021 (in thousands of dollars)

	FY 2018	FY 2019	FY 2020	FY 2021 Five percent reduction	FY 2021 Alternative estimate
President's Budget	6,400	6,440	7,000	6,650	7,992
Initial Appropriation	6,400	6,890	--		
Appropriation Adjustment					
Budget Authority	6,400	6,890	--		
FTEs	37	37	37	34	38

Budget Request

Effect of Alternatives on ACHP Program and Operations

Five-percent reduction alternative. The ACHP would reduce its current authorized staffing level, reduce travel, and forego meeting necessary cybersecurity and information technology demands. The ACHP has a chronic shortfall in salaries and benefits for its authorized 37 FTEs, which increases each year by approximately $150,000 due to government-wide pay raises and scheduled within-grade increases. The shortfall projected for FY 2021 at the President's FY 2020 budget level of $7,000,000 would be $524,000. At the funding level proposed in the President's FY 2020 budget request, the ACHP is able to support only 36 of its authorized 37 FTEs, so a position (GS-14 senior program analyst) is currently unfilled. At the five-percent reduction level, that position would remain vacant and two additional positions would be eliminated, bringing the actual FTE count to 34. Program reductions throughout the agency would be prioritized to maintain as much as possible the ACHP's ability to fulfill its Section 106 responsibilities and meet minimum standards of cybersecurity.

Specific program impacts would include the following:

-Inadequate capacity to meet the increased demand for Section 106 program alternatives, requiring the ACHP to pursue only the highest priority ones, thereby foregoing opportunities for other federal agencies to introduce significant efficiencies in managing their permitting and assistance programs.

-Cutbacks in ACHP training efforts, primarily in a reduction of on-site courses and technical assistance due to travel fund reductions. This would be particularly impactful for tribal training.

-Major cutbacks in the areas of policy development and programs to promote the engagement of diverse communities and youth in the national historic preservation program. Two positions would be lost in the Office of Preservation Initiatives and one in the Office of Communications, Education, and Outreach, impacting legislative analysis, input on executive branch policies affecting historic preservation, participation in the White House HBCU program, and Tribal Historic Preservation Office education efforts.

-Slow the significant progress made in improving the agency cybersecurity operational maturity and capabilities and Security Operations Center modernization plans; meeting NIST Cybersecurity Framework areas, Executive Order 13800, the President's Management Agenda's Modernizing IT CAP Goal, and the OMB M-17-09 and DHS Cybersecurity directives for securing HVAs and establishing the foundation for supporting digital identity management as required by HSPD-12 and OMB memo M-19-17.

-Halting automation and orchestration of security operations. Critical cybersecurity automation capabilities currently deployed would not be able to operate. Significant work is being done to implement a security orchestration and automation (SOAR) platform to support the limited cybersecurity staff by automating higher tier security work and improve speed of triage, detection, and response. SOAR platform recurring costs are $56,000. This cybersecurity function is essential to support the President's Management Agenda CAP Goals by reducing Cybersecurity Risks to the Federal Mission by leveraging commercial and cutting-edge capabilities with high returns on investment.

-Suspending IT maintenance contracts or cybersecurity product renewals to manage costs. Difficult decisions would have to be made to manage the risks to the agency between ensuring fundamental operational security and operational vulnerabilities due to out of maintenance technology systems, significantly increasing risk exposure.

-Continuity of operations would be impacted as the required software licenses, hardware support, and cloud solution subscriptions to support infrastructure redundancy could no longer be fully funded. Redundancy and disaster recovery infrastructure planned for implementation in FY 2020 and FY 2021 would impose increased recurring costs in FY 2021.

-Discontinuing maintenance and replacement of legacy equipment, including vulnerability mitigation for designated High Value Assets as required by Binding Operational Directive 18-02, Securing High Value Assets. This work supports the President's Management Agenda, Prioritize HVA Modernization: Promote the modernization and security of the federal government's highest value information assets in a prioritized fashion and utilize commercial cloud-based solutions.

-Cutbacks to IT training and reskilling programs. Continuing training and reskilling is required to support infrastructure modernization initiatives, and the ACHP has provided increased training to its IT staff to implement and operate new cybersecurity and cloud capabilities. Further training would be limited, impacting the ACHP's ability to meet the goals of the President's Management Agenda: Build a modern IT workforce.

-Cutbacks on the implementation of the new digital web analytics program supporting the agency's website and social media products, whereby web and search data is analyzed for insights on utilization of agency digital services. Iterative improvements to web services and customer satisfaction would be halted.

Alternative estimate. This level would maintain the current level of operations, provide adequate funding to meet mandated cybersecurity requirements and essential IT needs, and include modest increases to meet the highest priority needs for the ACHP's Section 106 work. The program impacts of the five-percent reduction budget would be avoided. The ACHP would be able to support its currently authorized staff of 37 FTEs, continue its FY 2019 level of operations, meet projected cybersecurity and information technology needs, and add capacity to meet projected demands from federal agencies for Section 106 program alternatives in the infrastructure area. In addition to enabling the ACHP to maintain its authorized complement of 37 FTEs, an additional senior program analyst would be added dedicated to the development of program alternatives for federal agencies with a priority for infrastructure projects. Funding for IT and cybersecurity would be increased to meet actual needs and conform to the President's Management Agenda.

Specific program impacts would include the following:

-Eliminating the chronic shortfall in salaries and benefits for 37 FTEs, which is estimated to be $524,000 for FY 2021. The sum of $ 5,958,000 for FY 2021 for salaries and benefits would fully fund current staffing levels. This would enable the ACHP to continue to maintain full capacity in its Section 106-related functions and to pursue legislative analysis, policy development, and engagement of diverse communities and youth at the FY 2019 level.

-Adding a senior program analyst in the Office of Federal Agency Programs ($161,795) dedicated to working on Section 106 program alternatives would significantly support the Administration's infrastructure initiatives.

-A small addition to travel funds ($20,000) to facilitate additional onsite tribal training and support work with federal agencies on the development of program alternatives.

- Enhancement of the ACHP's *e*106 system to a web-based system offering online based initiation and tracking for adverse effect notifications to the ACHP and requests for dispute resolution on Section 106 cases ($60,000). This would be the next incremental step toward developing a web-based *e*106 system to provide real-time tracking of case reviews for agencies, other participants, and the public. It supports the President's Management Agenda CAP Goal: Modernizing IT to improve Productivity and Security by modernizing legacy technology and improving quality and efficiency of critical citizen services by utilizing commercial cost effective cloud-based solutions.

-Providing critical cybersecurity automation capabilities and orchestration of security operations. Significant work is being done to implement a security orchestration and automation (SOAR) platform to support the limited cybersecurity staff by automating higher tier security work and improve speed of triage, detection, and response. Funding ($56,000) would be used for platform licensing recurring costs. This cybersecurity function is essential to support the President's Management Agenda: Reduce Cybersecurity Risks to the Federal Mission by leveraging commercial and cutting-edge capabilities, enabling high returns on investment for cybersecurity. This initiative also supports the agenda for shifting from low-value to high-value work by using automation software.

-Continuing maintenance and replacement of legacy equipment, including vulnerability mitigation for designated HVAs as required by Binding Operational Directive 18-02, Securing High Value Assets. This is a recurring requirement to mitigate operational risks by funding maintenance contracts ($25,000) and support cloud-based disaster recovery infrastructure ($35,000) to ensure continuity of operations by protecting agency HVA data storage systems. This work supports the President's Management Agenda, prioritize High Value Asset Modernization: Promote the modernization and security of the Federal Government's highest value information assets in a prioritized fashion and utilize commercial cloud-based solutions.

-Adding connectivity redundancy and securing the agency's internet connection by providing secure remote access to staff and to cloud productivity solutions. Legacy remote access equipment would be replaced with cloud-based secure access solutions ($55,000). This supports the President's Management Agenda CAP Goal: Modernizing IT to improve Productivity and Security by modernizing legacy technology and improving quality and efficiency of critical citizen services by utilizing commercial cost effective cloud-based solutions.

-Improving the agency website infrastructure to add redundancy and improve security. With the prospect of streamlining *e*106 online, the agency web services will become a critical component to support the system, which necessitates availability guarantees and infrastructure improvements. The funding ($25,000) is required to support the required additional cloud infrastructure and implementation costs.

-Providing new technology solutions and implementation to satisfy requirements of the OPEN Government Data Act and Evidence Act by publishing machine readable Section 106 case data to data.gov for public use. The funds ($30,000) would be used for contract services. This supports the President's Management Agenda: Leveraging data as a strategic asset and facilitating use of government data assets by external stakeholders.

Figure 2. Appropriation and Authorization Language

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Appropriation Language

ADVISORY COUNCIL ON HISTORIC PRESERVATION
SALARIES AND EXPENSES

For necessary expenses of the Advisory Council on Historic Preservation (Public Law 89-665, as amended), [$7,000,000*] $6,650,000 or $7,992,000

Consolidated Appropriations Act, 2019 [Public Law116-6]

</div>

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Authorization Language

There are authorized to be such amounts as may be necessary to carry out this title.

National Historic Preservation Act Amendments Act of 2006
[Public Law 109-453]

</div>

President's Management Agenda

As required, the ACHP has identified proposals in this Budget Estimate (with target funding levels) that address Cross-Agency Priority (CAP) Goals of the President's Management Agenda, particularly in identified priority areas. This discussion of the CAP Goals can be found in Appendix A.

Evidence and Evaluation

To report on progress toward meeting requirements of the Foundations for Evidence-Based Policymaking Act of 2018 (Public Law 115-435), the ACHP has completed the required FY 2021 Evidence Template. It is attached as Appendix B.

PROGRAM STRUCTURE

Mission and Authorities

The ACHP was established by Title II of the NHPA (54 U.S.C. §300101 et seq.). The NHPA charges the ACHP with advising the President and the Congress on historic preservation matters and entrusts the ACHP with the unique mission of advancing historic preservation within the federal government and being a leader in the national historic preservation program. Since FY 2011, the ACHP has been guided by the following mission statement:

> *The Advisory Council on Historic Preservation promotes the preservation, enhancement, and sustainable use of our nation's diverse historic resources, and advises the President and the Congress on national historic preservation policy.*

The ACHP's authority and responsibilities are principally derived from the NHPA. General duties of the ACHP are detailed in Section 202 (54 U.S.C. §304102) and include the following:

- Advising the President and the Congress on matters relating to historic preservation;
- Encouraging public interest and participation in historic preservation;
- Recommending policy and tax studies as they affect historic preservation;
- Advising state and local governments on historic preservation legislation;
- Encouraging training and education in historic preservation;
- Reviewing federal policies and programs and recommending improvements; and
- Informing and educating others about the ACHP's activities.

Under Section 106 of the NHPA, the ACHP reviews federal actions affecting historic properties to ensure historic preservation needs are balanced with federal project requirements. The ACHP achieves this balance through the Section 106 review process, which applies whenever a federal action has the potential to impact historic properties.

ACHP Membership

The ACHP has 24 statutorily designated members, including the chairman who is a full-time Presidential appointee confirmed by the Senate. The ACHP also includes a number of observers who have been invited to participate in the work of the ACHP (See Figure 6).

Under the chairman's leadership, the ACHP members address policy issues, direct program initiatives, and make recommendations regarding historic preservation to the President, Congress, and heads of other federal agencies. ACHP members pursue ACHP activities both collectively and individually. The membership is organized into an Executive Committee and four program committees: Federal Agency Programs; Native American Affairs; Preservation Initiatives; and Communications, Education, and Outreach. Member task forces and committees are also formed to pursue specific needs such as policy development or regulatory reform oversight.

ACHP Staff

ACHP staff carry out the day-to-day work of the ACHP and provide all support services for council members. In addition to its permanent staff, the ACHP maintains interagency liaison positions funded by the Federal Highway Administration, Bureau of Land Management, General Services Administration (GSA), VA, NPS, and Forest Service. The executive director supervises all staff components.

Figure 3. Staff Organization Actual and Proposed, FY 2018-2021

Function and FTEs	FY 2018	FY 2019	FY 2020	FY 2021 Five percent reduction	FY 2021 Alternative estimate
Chairman*	1	1	1	1	1
Executive Director	1	1	1	1	1
Office of Native American Affairs	3	3	3	3	3
Office of General Counsel	2	2	2	2	2
Office of Administration	4	4	4	4	4
Office of Information Technology	3	3	3	3	3
Office of Preservation Initiatives	3	3	3	1	3
Office of Federal Agency Programs	16	16	16	16	17
Office of Communications, Education, and Outreach	4	4	4	3	4
TOTAL	**37**	**37**	**37**	**34**	**38**

*Though authorized since December 2016, the position was vacant throughout FY 2017, FY 2018, and most of FY 2019. It was filled on July 15, 2019.

The **Chairman** is appointed by the President and confirmed by the Senate.

The **Executive Director** has senior management responsibility for all staff organizational units and reports to the chairman.

The **Office of General Counsel** provides legal advice and analyses, reviews and manages Freedom of Information Act requests, oversees the agency ethics program, and processes agency personnel actions.

The **Office of Native American Affairs** advises the ACHP leadership and staff on policy and program matters related to Native American issues, and offers technical assistance and outreach for tribal and NHO consultation under the Section 106 review process.

The **Office of Preservation Initiatives** analyzes legislation, develops policy recommendations, oversees special studies and reports, and implements programs related to national preservation benefits such as community development, economic impacts, sustainability, and tourism.

The **Office of Federal Agency Programs** participates in Section 106 reviews, develops and implements program improvement initiatives, provides technical assistance and guidance for Section 106 users, and works to improve federal agency and stakeholder understanding of Section 106. It also oversees implementation of Section 3 of Executive Order 13287, "Preserve America," assists in carrying out the ACHP's responsibilities as a member of the Permitting Council, and manages the ACHP's training program, including delivery of onsite courses, webinars, and distance learning initiatives.

The **Office of Communications, Education, and Outreach** creates and conveys the ACHP's message to partners, stakeholders, and the general public via print and electronic media, meets information requests from citizens and Congress, handles media relations, takes the lead on engaging youth in historic

preservation, and manages ACHP outreach, awards, and publications.

The **Office of Administration** oversees a full range of administrative, procurement, budget, and fiscal services and coordinates related services provided by the Department of the Interior and GSA on a reimbursable basis. The office also provides administrative and clerical support to ACHP leadership.

The **Office of Information Technology** manages the ACHP's information technology services, infrastructure, and cybersecurity operations supporting ACHP programs. The office maintains the agency data center, cloud infrastructure, network, telecommunications, and information security.

Figure 4. Expenditures by Object (in thousands of dollars) with 5% cut from FY20 President's budget

		FY 2019 Enacted	FY 2020 President's budget	FY 2021 Budget Request (5% cut from FY20 President's budget)	FY20 President's budget vs FY21 Request (5% cut)
11/12	Salary/Benefits	5,394	5,434	5,204	-230
21	Travel	132	132	122	-10
22/23	Freight, Rent, Communications, Utilities	628	628	628	
24	Printing	4	4	4	
25	Contract Services	682	732	682	-50
26	Supplies	8	8	8	
31	Equipment	42	62	2	-60
	TOTAL	**6,890**	**7,000**	**6,650**	**-350**
	FTEs	37	37	34	-3

Figure 5. Expenditures by Object (in thousands of dollars), Alternative estimate

		FY 2019 Enacted	FY 2020 President's Budget	FY 2021 Alternative Estimate	FY20 President's budget vs FY21 Alternative Estimate
11/12	Salary/Benefits	5,394	5,434	6,120	+686
21	Travel	132	132	152	+20
22/23	Freight, Rent, Communications, Utilities	628	628	628	
24	Printing	4	4	4	
25	Contract Services	682	732	1,018	+286
26	Supplies	8	8	8	
31	Equipment	42	62	62	
	TOTAL	**6,890**	**7,000**	**7,992**	**+992**
	FTEs	37	37	38	+1

Figure 6. Members, Advisory Council on Historic Preservation (September 2019)

Chairman
Hon. Aimee K. Jorjani (Virginia)

Vice Chairman
Leonard A. Forsman (Chairman, Suquamish Tribe; Washington)

Expert Members
Terry Guen FASLA (Illinois)
Dorothy T. Lippert, Ph.D. (Choctaw Tribe; Washington, D.C.)
Luis G. Hoyos, RA (California)
Robert G. Stanton (Virginia)

General Public Members
Bradford J. White (Illinois)
Jordan E. Tannenbaum (Virginia)

Native American Member
Reno Keoni Franklin (Kashia Band of Pomo Indians; California)

Governor
Vacant

Mayor
Vacant

Architect of the Capitol
Thomas J. Carroll, Acting

Secretary, Department of Agriculture
Hon. Sonny Perdue

Secretary, Department of Defense
Hon. Mark T. Esper

Secretary, Department of Education
Hon. Elizabeth Prince DeVos

Secretary, Department of Homeland Security
Kevin K. McAleenan, Acting

Secretary, Department of Housing and Urban Development
Hon. Benjamin S. Carson, MD

Secretary, Department of the Interior
Hon. David Bernhardt

Secretary, Department of Transportation
Hon. Elaine L. Chao

Secretary, Department of Veterans Affairs
Hon. Robert L. Wilkie

Administrator, General Services Administration
Hon. Emily W. Murphy

Chairman, National Trust for Historic Preservation
Timothy P. Whalen (California)

President, National Conference of State Historic Preservation Officers
Mark Wolfe (Texas)

General Chair, National Association of Tribal Historic Preservation Officers
Shasta C. Gaughen (Pala Band of Luiseno Mission Indians; California)

Observers:

Secretary, Department of Energy
Hon. James Richard Perry

Administrator, Environmental Protection Agency
Hon. Andrew Wheeler

Chair, Council on Environmental Quality
Hon. Mary Neumayr

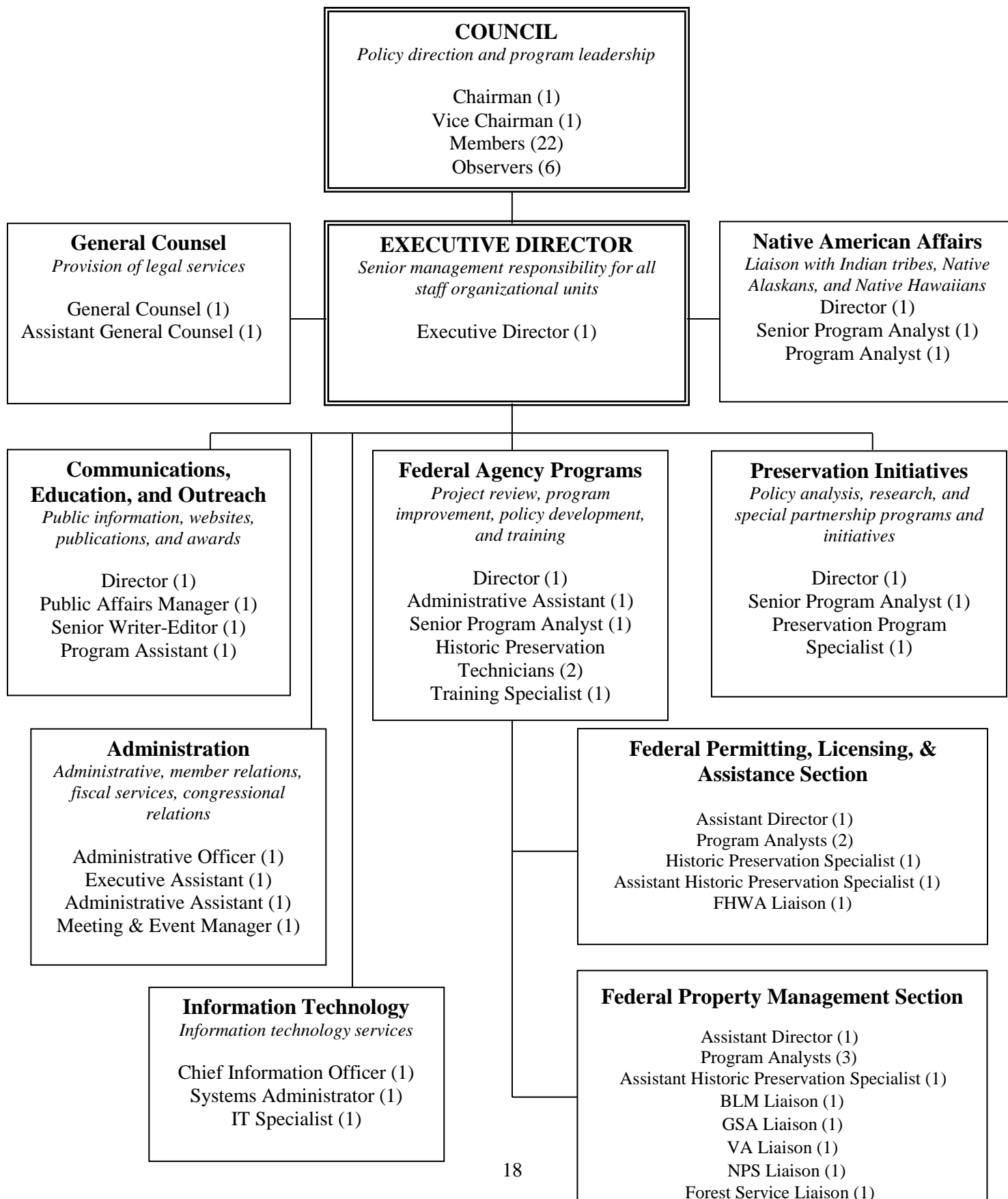**Chair, National Alliance of Preservation Commissions**
Patricia Blick (Arkansas)

President, ACHP Foundation
Katherine Slick

Joseph P. Riley Jr.
Charleston, South Carolina

Figure 7. ACHP Organizational Structure (September 2019)

COUNCIL
Policy direction and program leadership

Chairman (1)
Vice Chairman (1)
Members (22)
Observers (6)

General Counsel
Provision of legal services

General Counsel (1)
Assistant General Counsel (1)

EXECUTIVE DIRECTOR
Senior management responsibility for all staff organizational units

Executive Director (1)

Native American Affairs
Liaison with Indian tribes, Native Alaskans, and Native Hawaiians
Director (1)
Senior Program Analyst (1)
Program Analyst (1)

Communications, Education, and Outreach
Public information, websites, publications, and awards

Director (1)
Public Affairs Manager (1)
Senior Writer-Editor (1)
Program Assistant (1)

Federal Agency Programs
Project review, program improvement, policy development, and training

Director (1)
Administrative Assistant (1)
Senior Program Analyst (1)
Historic Preservation Technicians (2)
Training Specialist (1)

Preservation Initiatives
Policy analysis, research, and special partnership programs and initiatives

Director (1)
Senior Program Analyst (1)
Preservation Program Specialist (1)

Administration
Administrative, member relations, fiscal services, congressional relations

Administrative Officer (1)
Executive Assistant (1)
Administrative Assistant (1)
Meeting & Event Manager (1)

Federal Permitting, Licensing, & Assistance Section

Assistant Director (1)
Program Analysts (2)
Historic Preservation Specialist (1)
Assistant Historic Preservation Specialist (1)
FHWA Liaison (1)

Information Technology
Information technology services

Chief Information Officer (1)
Systems Administrator (1)
IT Specialist (1)

Federal Property Management Section

Assistant Director (1)
Program Analysts (3)
Assistant Historic Preservation Specialist (1)
BLM Liaison (1)
GSA Liaison (1)
VA Liaison (1)
NPS Liaison (1)
Forest Service Liaison (1)

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PRESIDENT'S MANAGEMENT AGENDA

The following summarizes proposals in this Budget Estimate that address Cross-Agency Priority (CAP) Goals of the President's Management Agenda, particularly in identified priority areas. As noted previously, the ability of the ACHP to successfully pursue these goals in FY 2021 will be dependent upon available funding.

IT Modernization

In conformance with the President's Management Agenda, the agency is focused in providing a modern information technology function as the foundation of how the ACHP serves its constituency securely and efficiently with service excellence. The ACHP is prioritizing enterprise-wide outcomes that enhance IT service effectiveness and reduce cybersecurity risks, while implementing cutting edge technology and replacing legacy infrastructure using modern cloud based solutions.

- Reduce Cybersecurity Risks to the Federal Mission: All four ACHP Cybersecurity Risk Management Assessment security domains ratings are being actively targeted for improvement to achieve "Managing Risk" ratings, and fully implement the NIST Frameworks. Significant work is being done to improve cybersecurity operational maturity of the organization and support the limited cybersecurity staff by automating higher tier security work, incorporate threat intelligence to improve speed of triage, detection, and response. Automation and machine learning are being utilized to further improve cybersecurity efficiencies.

- Modernize the Stack: The ACHP has started replacing legacy infrastructure using a phased approach. The end of systems life cycle for ACHP networking, storage, and computing has been reached. Technology infrastructure equipment is being replaced over a multi-year period, augmenting cloud based solutions where appropriate to support the phased modernization.

- Embrace Cloud Solutions: The ACHP has been an early adopter of cloud solutions, operating core mission applications and infrastructure in the cloud since 2007. In subsequent years, the agency migrated to the cloud for email and collaboration, web services, and for cybersecurity. Connectivity security and availability is being improved using cloud solutions instead of expanding traditional infrastructure footprint.

- Build a Modern IT Workforce: The ACHP has provided increased training to its IT staff to achieve modernization goals and support the latest technologies. Valuable training has been completed to operate new cybersecurity and cloud capabilities. Continuing training and reskilling will be provided to support infrastructure modernization initiatives.

  Data Accountability and Transparency

- Recognizing the importance of ensuring that information about historic properties is readily available to project planners, the ACHP established a Digital Information Task Force in the fall of 2018. Access to better information will contribute significantly to current government-wide efforts to improve the efficiency of environmental reviews for infrastructure projects, including reviews under Section 106 of the NHPA. In 2021, the ACHP will implement Task Force recommendations on steps to help improve access to

digital tools that could assist federal agencies, states, Indian tribes, and local communities in planning. Training is a critical component of improving the efficiency of the federal historic preservation review process. The ACHP will continue its training program in 2021 to assist federal, state, tribal, local, and industry representatives to increase their understanding of the Section 106 process.

- The ACHP will support OPEN Government Data by acquiring solutions to publish machine readable Section 106 case data to data.gov for external stakeholders for use in commercial ventures, innovation, or other public uses.

- A digital analytics program is being established. Web and search data is analyzed for insights on utilization of agency digital services. Iterative improvements to web services and customer experience will be done using the data.

- The ACHP is committed to offering specialized training for Indian tribes, in partnership with other federal agencies, in an effort to ensure that tribes are fully prepared to participate in the Section 106 review process. This specialized training will continue in 2021.

Shifting from Low-Value to High-Value Work

- In supporting the goals of Executive Order 13807 and the One Federal Decision Memorandum of Understanding, the ACHP is actively advancing the use of Section 106 program alternatives to increase the efficiency and effectiveness of historic preservation reviews, notably for infrastructure projects. Such alternatives focus on programmatic approaches rather than project-by-project review. In FY 2021, the ACHP anticipates growing interest among federal agencies in working with the ACHP to develop program alternatives that establish efficiencies and tailor Section 106 reviews for critical federal programs. The ACHP would also pursue expansion of its *e*106 system.

- Significant work is being done to implement a security orchestration and automation platform to support the limited cybersecurity staff by automating higher tier security work and improve speed of triage, detection, and response. This supports the shift from low-value manual cybersecurity work to high-value work by using automation software. Automation and machine learning are being utilized to analyze large security datasets and reduce manual work.

Modernize Infrastructure Permitting

- As noted in the budget main text, the ACHP has set as its highest priority the improvement of the efficiency of Section 106 reviews for infrastructure projects, and this CAP Goal will be central to the ACHP's work in FY 2021. Actions range from pursuing Section 106 program alternatives and collaboration with the Permitting Council on government-wide innovations to training for agencies and stakeholders and working cooperatively with industry to remove impediments. Many of the actions noted for the previously mentioned CAP Goals also will help fulfill this goal.

**FY 2021 ADVISORY COUNCIL ON HISTORIC PRESERVATION
EVIDENCE SUBMISSION**

Section 1. Agency Contributors to Evidence Submission

Rezaur Rahman, Chief Data Officer and Chief Information Officer, Office of Information
Technology
Ismail Ahmed, Administrative Officer, Office of Administration
Druscilla Null, Director, Office of Preservation Initiatives
Reid Nelson, Director, Office of Federal Agency Programs

**Section 2. Progress Implementing the Foundations for Evidence-Based Policymaking Act
of 2018, Public Law No. 115-435 (i.e., Evidence Act)**

(a) Multi-Year Learning Agenda (Evidence-building Plan);
(b) Annual Evaluation Plan; and
(c) Capacity Assessment.

The ACHP is not a CFO Act agency and thus is not required to report on most aspects of the Foundations
for Evidence-Based Policymaking Act. The ACHP does not routinely collect data on a large scale on
either issues or individuals. That being said, the ACHP does collect data on the review of projects and
programs under Section 106 of the NHPA (Section 106). The agency also collects information on
participants in ACHP-sponsored training on Section 106. The ACHP also has created a Digital
Information Task Force to explore how improved access to digital tools could assist federal agencies,
states, Indian tribes, and local communities in planning for federal projects and completing Section 106
review. In addition, the ACHP periodically collects data for analyzing federal policy, undertaking specific
studies, and disseminating information on the agency's website. The ACHP is committed to the
fundamental goals of the Foundations for Evidence-Based Policymaking Act to support evidence-based
policymaking in the federal government while improving access to data, strengthening privacy
protections, and ensuring the capacity to generate and use evidence.

(d) Data governance.

The ACHP is in the process of establishing its Data Governance Body. Since development of a new
ACHP Strategic Plan was postponed pending the recent confirmation of the agency's first full-time
chairman, development of data governance strategies has been on hold pending adoption of the new
Strategic Plan.

(e) Barriers; and
(f) Identification of Training Needs/Technical Support.

Identification of barriers and training needs will be a priority of the ACHP Data Governance
Body once it is convened.

Section 3. Priority Evidence Requests

The ACHP's Digital Information Task Force (Task Force) addresses the need for more uniformly
available digital tools, including GIS, to improve planning for federal projects by making information
about the location of identified historic properties more readily available. Such information can provide a

platform for development of preservation outcomes. Better information access has a clear connection to current government-wide efforts to improve the efficiency of environmental reviews, including Section 106 reviews, for infrastructure projects, and can also advance broader ACHP goals such as better engagement of stakeholders and the public in preservation planning.

The Task Force is working with invited members of an Advisory Group, including state and tribal historic preservation officials, technical experts, consultants, representatives of industry, and others with policy or operational experience in digital information management, about how different natural and cultural resources organizations have approached developing and maintaining databases and other digital planning tools. While the ACHP does not collect data on historic properties directly, the goal is for the Task Force to act as a catalyst for enhancing the use of geospatial evidence to achieve greater effectiveness and efficiency in the overall operation of the Section 106 review process.

The Task Force is the ACHP's highest priority effort supporting the use of evidence to address policy and program improvement.

Section 4. Progress Implementing the Foreign Aid Transparency and Accountability Act of 2016

The ACHP does not administer foreign assistance as defined in OMB Bulletin 12-01 and thus is not required to report.

APPENDIX C

INFORMATION TECHNOLOGY & CYBERSECURITY

The ACHP is implementing guidance from NIST, OMB, and DHS Cybersecurity and Infrastructure Security Agency (CISA) to manage the cybersecurity component of enterprise risk as directed in the Executive Order on Strengthening the Cybersecurity of Federal Networks and Critical Infrastructure, consistent with OMB M-17-25 requirements.

FY 2019:

The ACHP does not have a dedicated staffed SOC. However, by effectively utilizing available funding and with the support of agency leadership the agency has established an effective cybersecurity operations program. In FY 2019, the agency was able to operationalize cybersecurity tools, incorporate threat intelligence from CISA shared services, and start automating cybersecurity processes. Prioritization of a risk-based perspective was possible as base security operational capability and agency-wide visibility was established. The 2019 Security Operations Center Maturation Survey reflects the service and capability improvements achieved in FY 2019.

2019 Infrastructure Operations and Cybersecurity Operations Maturity Improvements:

Vulnerability and Asset Management: Daily scanning and vulnerability assessments, real-time network mapping, and exploit checking capabilities were implemented. Remediation is a manual process, which is planned to be automated in the future.

Threat Intelligence and Assessment: Real-time and retroactive checks of network traffic against Cyber Treat Intelligence data feeds using both automated and manual processes were implemented.

Security Monitoring: Operationalized collection and analysis of data feeds, logs, and alerts, and escalation of indications are done through combination of Security Information and Event Management (SIEM) and cloud security products on networks and endpoints.

Analysis and Detection: Automated threat analytics and detection on network traffic and endpoints was implemented. Threats are correlated to threat intelligence and rules, prioritized using threat scores. Manual analysis is performed on high score alerts for investigation and validation.

Incident Management and Response: Active incident management processes were put in place. Alerts are monitored throughout the day, seven days a week. Any potential incidents are monitored for mitigation before success. Any incidents are addressed within a couple of hours. Due to proactive monitoring no successful major incidents have occurred.

Situational Awareness: Tactical understanding of situations was improved. Correlation to mission/business impact awareness is now available. Executive level support exists; however, not all processes and impacts are documented.

FY 2020:

2020 Infrastructure Operations and Cybersecurity Operations Maturity:

In FY 2020, high value improvements will be made in the cybersecurity operations capability areas with a focus on automation and training to the extent that funding is available. The FY 2020 funding will be utilized to operationalize the SOAR platform. Integrated with the agency's SIEM platform, the automation platform will coalesce areas of vulnerability assessment, threat intelligence, analysis, detection, incident management and response. Having a centralized, integrated security events and automation platform will allow closing of security skills gaps, multiply security operation capacity, and automate investigative actions and remediation responses. Full integration and deployment of these capabilities will significantly improve enterprise-wide visibility and the agency's ability to effectively secure the infrastructure with limited security staff. All critical maintenance contracts for HVAs will be renewed to allow security updates to mitigate vulnerabilities. Automated patching will be implemented if possible to reduce attack surfaces on-time.

Capabilities established in FY 2019 for vulnerability and asset management, threat intelligence and assessment, security monitoring, analysis and detection, incident management and response will be continued.

FY 2021:

2021 Infrastructure Operations and Cybersecurity Operations Maturity:

The FY 2021 enhanced alternative estimate would allow continuing improvements to cybersecurity services and infrastructure resiliency. That budget would ensure continued funding for capabilities operationalized in FY 2019 and FY 2020, while addressing capability gaps.

Continue automation and orchestration of security operations. Critical cybersecurity automation capabilities implemented with the SOAR platform will be automating higher tier security work and improve speed of triage, detection, and response. Funding is required for platform licensing recurring costs.

Continue replacement of legacy equipment, including vulnerability mitigation for designated High Value Assets as required by Binding Operational Directive 18-02, Securing High Value Assets. Augment cloud-based disaster recovery infrastructure to ensure continuity of operations by protecting agency HVA data storage systems.

Improve connectivity redundancy and securing the agency's Internet connection by providing secure remote access to staff and to cloud productivity solutions. Legacy remote access equipment would be replaced with cloud-based secure access solutions.

Improve the agency website infrastructure to add redundancy and improve security. With the prospect of streamlining *e*106 online, the agency web services will become a critical service to support the mission. This necessitates the availability guarantees and infrastructure improvements. The funding is required to support the required additional cloud infrastructure and implementation costs.
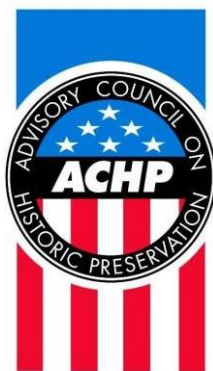
Preserving America's Heritage

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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