



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

MAR 09 2017

To: Regional and Associate/Assistant Directors

From: Associate Director, Business Services *Di. Aust.*

Subject: NPS Policy for Awarding CESU Financial Assistance Agreements

Please distribute the attached document to all relevant parties.

Document: Financial Assistance Policy and Procedures (FAP&P) 1443-2017-02

Originating Office: Washington Contracting and Procurement Office

Type of Document: Policy

Reply Required: Yes By:
No
Optional

Comments:

For Further Distribution To: NPS Acquisition Management Council (AMC), Administrative Advisory Committee (AAC), Financial Assistance Personnel and CESU Coordinators

Purpose: This policy establishes a new process for awarding financial assistance awards for the Cooperative Ecosystem Studies Units (CESU) program. For the purpose of this FAP&P the CESU program is defined as any financial assistance award that references the CESU cooperative and joint venture agreements.

Effective Date: This FAP&P is effective on the date of final signature, with full implementation required no later than 90 days following the effective date.

Attachment: FAP&P 1443-2017-02



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IN REPLY REFER TO
10C (2623)

Financial Assistance Policy and Procedures (FAP&P) 1443-2017-02

To: NPS Acquisition Management Council (AMC)
Administrative Advisory Committee (AAC)
Financial Assistance Personnel
CESU Coordinators

Through: Associate Director, Business Services
Dei Austin

From: Bureau Procurement Chief *ALP*

Subject: **NPS Policy for Awarding Financial Assistance Agreements through the Cooperative Ecosystem Studies Units Program**

- 1. Purpose:** This policy establishes a new process for awarding financial assistance awards for the Cooperative Ecosystem Studies Units (CESU) program. For the purpose of this FAP&P the CESU program is defined as any financial assistance award that references the CESU cooperative and joint venture agreements.
- 2. Effective Date:** This FAP&P is effective on the date of final signature, with full implementation required no later than 90 days following the effective date.
- 3. Expiration Date:** This FAP&P remains effective unless superseded or canceled.
- 4. Background and Explanation:** Prior to the issuance of this policy, the NPS has awarded financial assistance to CESU partners through the issuance of a task agreement, issued under the terms and conditions of the respective CESU's cooperative and joint venture agreement. While the CESU cooperative and joint venture agreements are multi-party agreements between all federal and non-federal partners, they functioned similarly to other master cooperative agreements awarded by the NPS. An internal review of DOI and NPS policies and procedures, along with review of 2 CFR Part 200, conducted by the Financial Assistance Policy Branch in

response to various FY16 audits and reviews, led to the conclusion that the award process by which CESU task agreements are currently issued will not pass scrutiny. This is due to the change in financial assistance regulations to 2 CFR Part 200 that occurred on December 26, 2014 and the DOI and NPS level policies that followed from the regulatory changes. Therefore, while the CESU cooperative and joint venture agreements are valid legal agreements similar to memorandums of understanding (MOUs), NPS no longer considers the CESU cooperative and joint venture agreements master cooperative agreements.

Each CESU cooperative and joint venture agreement contains the following language, “All Federal Agencies, Host University and Partner Institutions agree to: Issue individual funding documents, in accordance with each agency’s procedures... that individually include a specific “scope of work” statement and a brief explanation of the following:

- the proposed work;
- the project contribution to the objectives of the CESU;
- the methodology of the project;
- the substantial involvement of each party;
- the project budget and schedule;
- the specific project outputs or products.

The process for NPS review and approval of the CESU cooperative and joint venture agreements for the CESU program will not change; however, the process to award a new financial assistance agreement to a CESU partner will change. The process to obligate funds will follow the financial assistance process established and documented within NPS policy and guidance.

5. Action Required: While this FAP&P should be implemented as soon as possible, all CESU financial assistance agreements awarded 90 days after the issuance of this policy shall follow the revised CESU process of awarding financial assistance detailed in this FAP&P.

In order to be compliant with DOI and NPS policies, NPS procedures and guidance, and 2 CFR Part 200 where applicable, funding will be obligated to non-federal CESU partners by the issuance of either a master or stand-alone NPS cooperative agreement. Entering into a cooperative agreement, be it a master or stand-alone agreement, will require compliance with pre-award documentation; the creation and retention of an official file of record which includes all NPS mandatory templates and documentation; posting requirements for single source award determinations; and, in the case of competitive financial assistance opportunities, competitions, following regulations set forth in 2 CFR Part 200 and all associated DOI and NPS policy requirements.

6. Additional Information: Questions may be directed to Heidi Sage, NPS FA Policy Chief, at (303) 969-2065 or via email at Heidi_Sage@nps.gov.