

Arizona State Museum Mandated Programs Feedback Fora 2019 - 2020

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Part 1: Panel discussion on topics related to questions submitted in advance

- Quote website/invoice process
- Arizona Antiquities Act Blanket and Project-specific Permits
- ASM's review process
- Efficiency
- Mandated Programs Forms
- Communication between ASM and the CRM community
- Legacy Projects

Part 2: Open Q&A

- Please ask any questions you have
- Feel free to offer constructive criticism about a specific system or process. We want to serve you better while meeting our responsibilities under the law and best practices.





We hope to:

- Clarify points of confusion
- Offer clarification on internal ASM procedures
- Look for ways to improve how ASM can better serve Arizona's archaeological community
- Increase understanding of the role of the AAA in the review and submission processes in each office
- Answer your questions and concerns



Question

 Would it be possible for ASM to provide online administrative data to institutions (such as a CRM company) to access ongoing projects, open accession numbers, etc.? For example, my thought was some sort of secure portal where I could access [Company name]-specific projects and invoices to better maintain timely payments, project registrations, and reporting requirements?

Answer

• This is a great idea and we will certainly strive for this once we have the financial and technical capabilities. Unfortunately, at this time, ASM does not have the financial, technical capabilities or staff resources.



Question

 Can you update the quote form to allow for typing in the project start and end dates? Some projects are old, and it takes a long time to click through to the appropriate year.

Answer

• We are looking into solutions to this issue - thank you for alerting us to it.

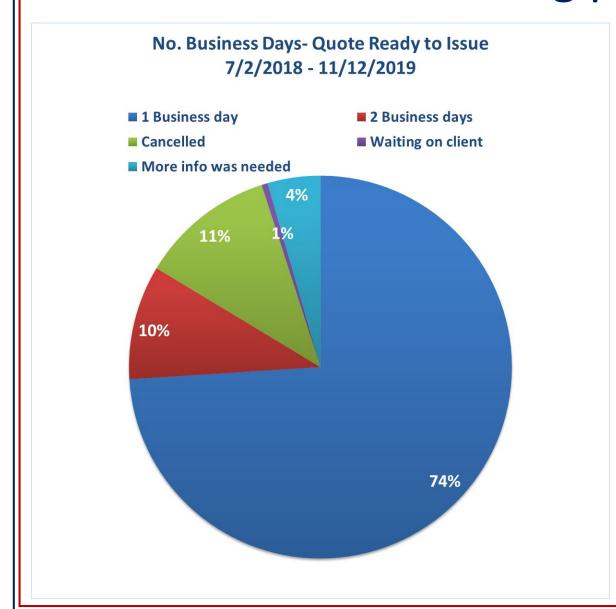


Question

• If quotes are supposed to be turned around within 2 business days, unless there are questions about the quote, shouldn't the questions that ASM staff have about said quote be required to come within that 2-business day window?

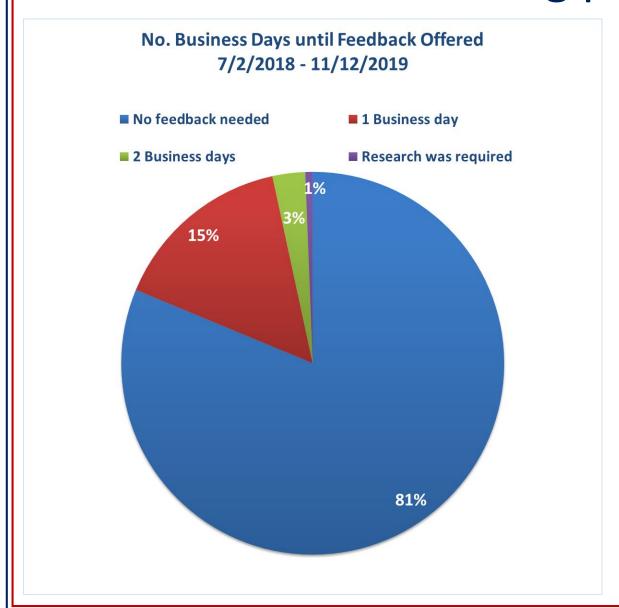
- ASM issues quotes within two business days of receipt, barring weekends and holidays. Please note that quotes submitted after 4 pm on a business day are not considered "submitted" until the next business day.
- Next slide has data on quote turnaround.





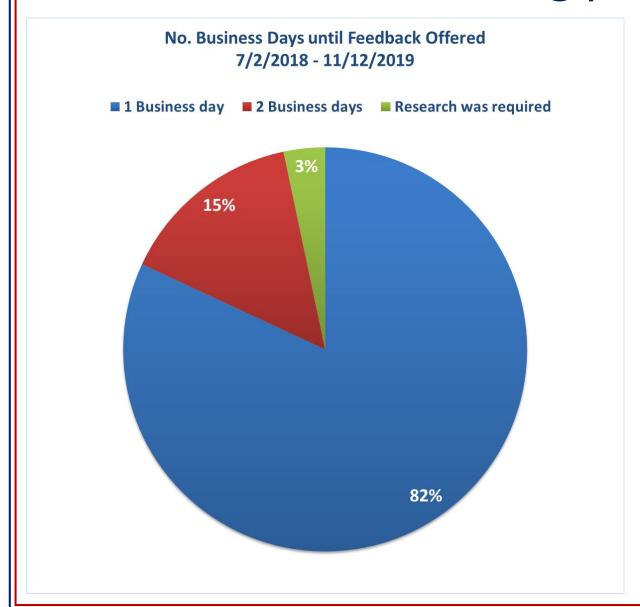
- 74% of all quotes are reviewed and ready to issue within 1 business day.
- 10% of all quotes are reviewed and ready to issue within 2 business days.
- 4% of all quotes required more than 2 business days to prepare.
 This category includes some grandfathered projects and customized quotes for Value-added services.
- 11% of all quotes were cancelled as a result of feedback offered within 1-2 business days.
- 1% of all quotes still require a response from the client, after 2 business days, before we can generate a quote.
- We have limited data on the date a quote was sent to a client.
 However, from 7/2018 8/2019 quotes were sent within 1 day or less from date of preparation.
- From 9/2019 10/2019, due to staff changeover there was a period when some quotes were sent out outside of the 2-business day window. Things are currently back on track.





- 81% of the quotes that have been received required no feedback.
- 19% of all quote requests have required feedback.





- If feedback was necessary:
 - 82% of emails or phone calls occurred within 1 business day.
 - 15% of emails or phone calls occurred within 2 business days.
 - 3% of emails or phone calls occurred after necessary research was completed. This category principally includes grandfathered projects.



Question

• There is a long lag between when payments are submitted to the museum and when they drop off of the outstanding invoices list when projects are paid via check. While we understand that it takes time to process payments, it would be helpful to show, on the invoices list, that those payments have arrived but are pending.

Answer

 Payments are processed and marked as paid as soon as they are received by the business center. We have a dedicated person on staff who handles your check payments. The fastest way to make an invoice "drop off" the list of outstanding invoices is to pay by credit card via the online system.

Arizona Antiquities Act Blanket and Project-specific Permits



Question

 Would the ASM consider adopting a blanket monitoring plan that could be used for ALL very small (less than 1 person day) projects with the end goal of allowing fieldwork to start sooner?

Answer

• A statewide "blanket" monitoring plan would not be allowable per the Rules Implementing the Arizona Antiquities Act (Rules). However, general plans for geographically-limited areas may be used with agency consent.

Arizona Antiquities Act Blanket and Project-specific Permits



Question

 Would the ASM consider issuing a permit to a municipality or agency to cover all emergency monitoring projects within a calendar year so that archaeologists can be dispatched quickly? A single report would be created at the end of the permit period summarizing all projects

Answer

 We're exploring ways we can assist with this need within the parameters of the Rules. A report will be issued after we meet with stakeholders and have explored the possibilities within the law.



ASM's review process

Question

 Regarding small projects with letter reports or SHPO Survey Report Summary Forms (SRSF), small projects generally have a very tight budget, and any extra effort usually results in a loss. Would it be possible to lighten some of the editing or submittal requirements for these small projects? We recently received comments back on a small telecom project with a three-page letter report 7 months after submitting the letter. The project had long been closed out and the comments had no action required but still requested re-submitting multiple hard copies and a CD.

Answer

ASM's review requirements are based on the Rules. ASM's goal is to review reports within 30 days of receipt. Implementation of this timed process started in 2019, so that likely explains the 7-month delay if the project was submitted prior. If the comments included no action, there should be no request for resubmittal unless AAA-required components were missing. ASM staff correct minor errors when possible, but in order to minimize requests for revision, please consult ASM's review requirement documents, including (1) Minimum Requirements and Checklist for Reports, Treatment Plans, and Maps Submitted to the ASM for Work Conducted Under an AAA Permit, (2) the Request for Revisions form itself, and (3) soon-to-beissued Submission Procedures and Checklists (see next slide).

Forthcoming!

Submission Procedures and Checklists guide





Submission Procedures and Checklists for Cultural Resource Management Services Requested from the

ARIZONA ANTIQUITIES ACT PERMITS OFFICE,
ARCHAEOLOGICAL RECORDS OFFICE,
ARCHAEOLOGICAL REPOSITORY, AND
REPATRIATION OFFICE

AT THE
ARIZONA STATE MUSEUM

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Date: 11 November 2019 Revised:--

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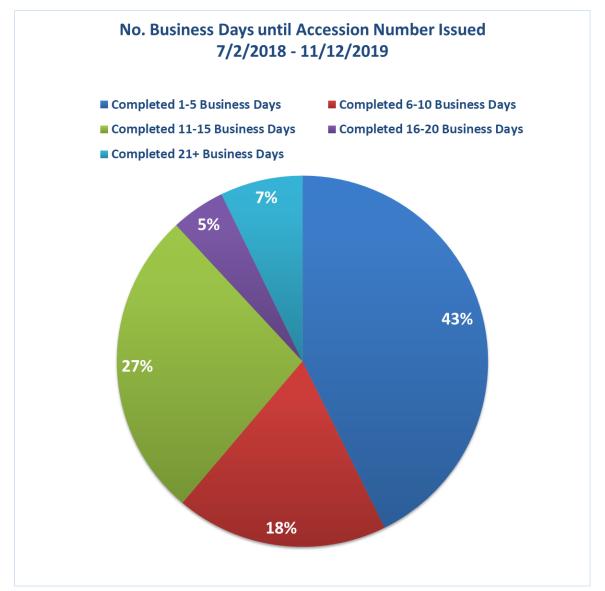
• Why does it take so much longer to assign accession numbers and site numbers? There used to be a fast turn-around on these items, but now it takes a month. Even if we request accession numbers as soon as the job is awarded to us, it takes a month to get the accession number, and, in the case of small projects, the project is done in a couple of weeks, and we are forced to wait to curate the project when it should be closed on our end. The same goes for site numbers.

Answer

• Since July 1, 2018, the turnaround time for these numbers has increased due to workflow capacity issues. The ARO is sensitive to the need for quick turnaround times for CRM projects and we strive to issue accession numbers and site numbers as quickly as we can. Although our timeline is 20 business days (4 weeks) from the date the invoice is paid, we typically issue the numbers within 3 weeks (see data on next slide) and provide an expedited service option. We are understaffed but our goal is to increase ARO staff as soon as financially possible. Workflow tasks are being streamlined wherever possible. Submission of correct forms will help avoid delays. The soon-to-be-issued *Submission Procedures and Checklists* document will provide additional guidance on correct form submission procedures.



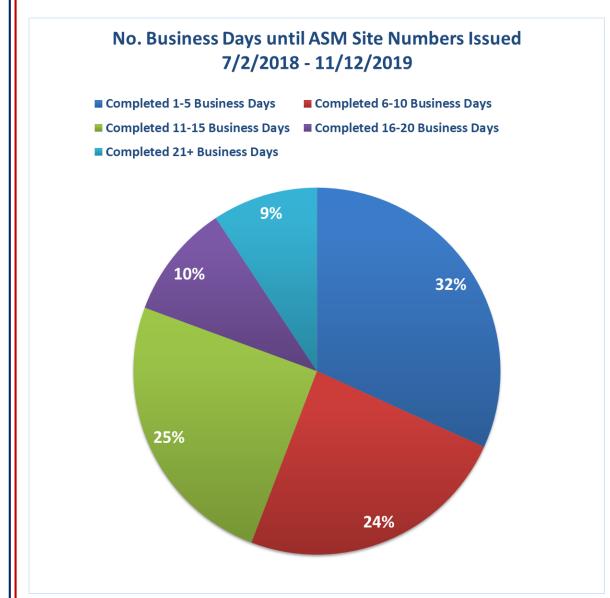




- 88% of Accession numbers are issued within 3 weeks.
- 5% of Accession numbers take 4 weeks to issue (the stated turnaround time).
- 7% of Accession numbers take longer than 4 weeks to issue due to:
 - o incomplete forms
 - invoice not paid
 - o client puts a hold on the Job



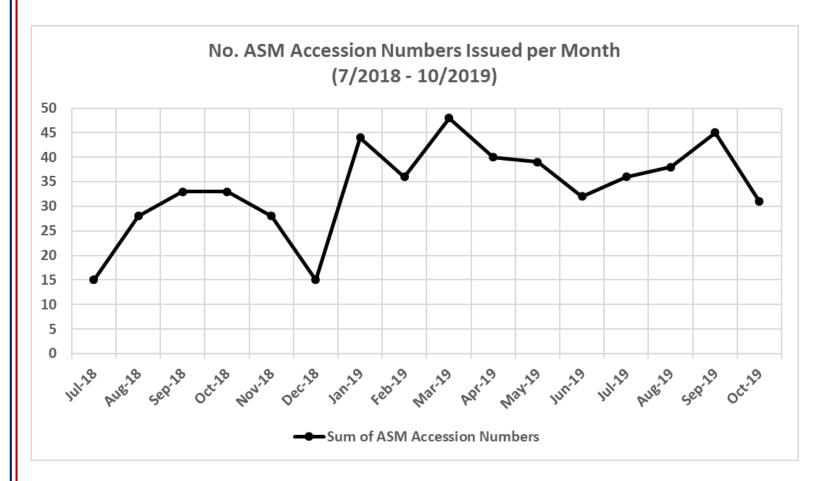




- 81% of site numbers are issued within 3 weeks.
- 10% of site numbers take 4 weeks to issue (the stated turnaround time).
- 9% of site numbers take longer than 4 weeks to issue due to:
 - incomplete forms (Accession number and/or site number request forms)
 - o invoice not paid
 - o client puts a hold on the Job



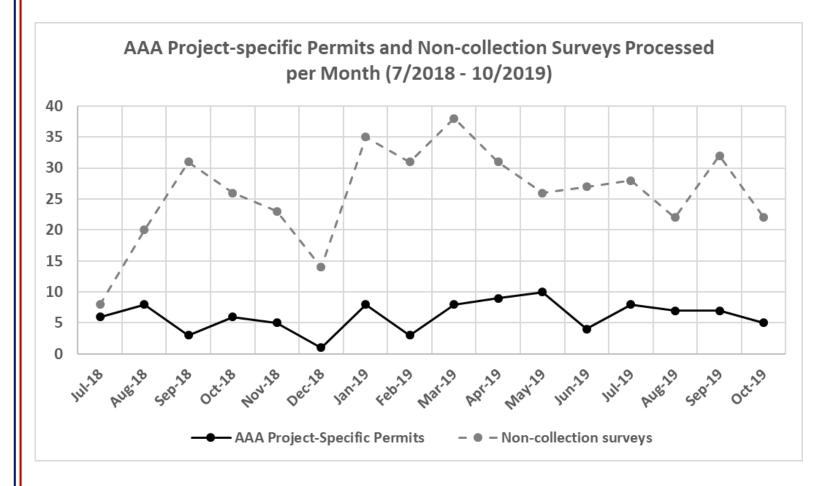




- The next three slides further demonstrate that the ASM is tracking monthly data (since July 1, 2018) in order to provide a streamlined process, when possible. Note that one staff member is responsible for all the tasks illustrated in these slides (and more) so delays and/or high numbers in one service affect other services.
- This slide illustrates the total number of Accession numbers issued (i.e., project registration).



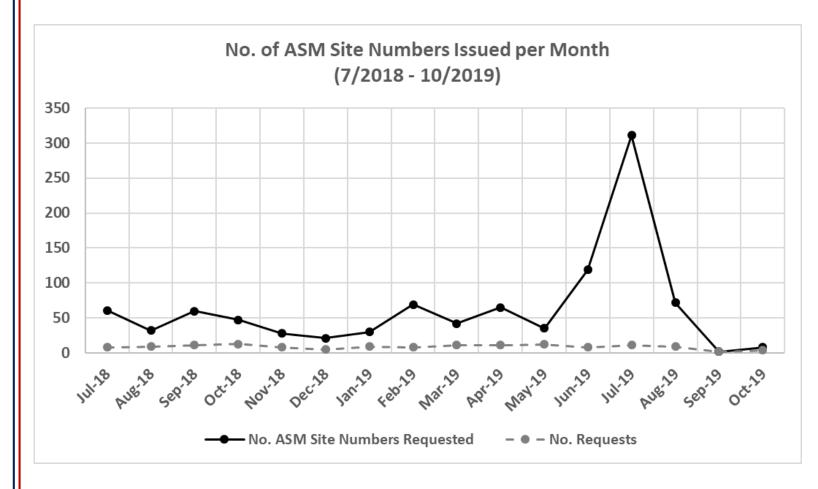




 This slide splits the data from the previous slide to illustrate the number of Accession numbers issued (i.e., project registration) for projectspecific permitted projects and for non-collection survey projects.







 This slide illustrates the number of site numbers issued. While the number of requests per month is relatively consistent, the quantity of site numbers per request can vary greatly.



Efficiency

Questions

• It would streamline the process to have accession numbers automatically assigned at the same time as a quote is accepted for a project. Or possibly when the first invoice is paid.

- Unfortunately, accession numbers cannot be auto-generated because there are many tasks associated with assigning accession numbers, such as form review, data entry, and registration paperwork. Once Invoice 1 is paid, the service is scheduled to be issued within the 20-business day timeline.
- Note: prior to implementation of the new system, ASM went through a 9-month "process-mapping" effort with an efficiency expert in order to streamline all of its processes.



Efficiency

Question

 Deadlines are critical in the CRM business. It is essential that ASM respond to our quote requests within the two-day window. And it isn't acceptable for accession numbers and site numbers to take upwards of 30 days to be assigned. As a vendor of services, ASM should be held to their deadlines.

Answer

We are sensitive to the need for quick turnaround times for CRM projects.
 Previous data (Graphs 1 and 2, Slides 7 and 8) show that we are meeting the 2-business day deadline for quotes. Although ARO has a 20-business day (4-week) turnaround for accession numbers and site numbers, most are issued within 3 weeks. There can be delays when revisions to incorrectly filled forms are required or invoices are not paid.





 Why are there two forms needed (PRF and PSF) for submitting a project? Could the two forms be combined?

- The Project Registration Form (PRF) and Project Submission Update (PSU) form each serve a purpose that ensures more efficient workflows.
- The PRF is a legal document that is required by the rules implementing the AAA. It streamlines project tracking in the ASM and contains information that ASM is required by the rules to curate.
- The PSU is a financial document that streamlines the invoicing process and allows us to make our materiality calculations.
- · We need to maintain both documents.





• Communication between ASM and CRM firms has been severely lacking. We are not notified when new forms are created; there are different procedures for curation than have been stated in correspondence to us. For example, the Project Specific Update form states that PRF forms should be submitted in digital copy; but the repository wants them in hard copy, which isn't stated anywhere.

- Email notices are sent to the AAA permit holders for distribution to their staff.
 - We have been putting time stamps on the website next to forms.
 - The forms themselves have a "last revised" date.
 - In response to this concern, we are in the process of developing a "blog-style" page on our website to hopefully make it easier for lab managers (etc.) to be aware of changes.
- Over the course of 2019, we were trying to resolve a huge number of issues regarding the administration of the AAA, utilizing a new financial and time-tracking system, and developing workflows to bridge gaps as they are identified. We appreciate notification of discrepancies, and have been trying to ensure that changes do not happen too fast, or unpredictably.





• It has been our experience, when trying to deal with legacy projects, that ASM is requiring those projects be prepped to today's standards. With older projects, this is not always feasible.

- A company may be submitting very old collections. "Legacy" projects are evaluated on a case-by-case basis and we are happy to help address problems.
- Collections must be usable, meet the standards stated in the Repository manual and, if the project is on State land, comply with the Rule. By meeting these requirements, together we ensure the long term research potential of collections.
- The old Repository Agreement can be terminated. However, the legacy project would then fall under the new fee structure and all new requirements would apply.



Part 2: Q&A from the Tucson Forum

The following slides contain the Q&A from the forum in Tucson on November 15, 2019.





Where can we drop off checks to pay for Mandated Programs services?

- Checks can be dropped off at the RII Business Center: 888 North Euclid Avenue,
 University Services Building, Room 204. Ask for Christina Rocha.
 - The address for the RIIBC is also on each Invoice.
- If you require more detailed drop-off information for the RIIBC, please call Christina Rocha, 520-626-0180.
 - This phone number is also listed on the bottom portion of each Invoice.





- Can we re-institute the old emergency monitoring projects blanket permit method?
- Is it possible to just amend an already existing AAA Project-specific Permit as utility maintenance emergencies come up?

- Monitoring cannot be conducted under blanket permits and "blanket" monitoring permits are not allowed under the Rules (see Rules implementing A.R.S. § 41-841, Chapter 8, Policies 8-202(A) and 8-203(E)). Emergency situations that involve an immediate threat to the archaeological resource or public safety are handled on a case-by-case basis (see Rules implementing A.R.S. § 41-841, Chapter 8, Policy 8-202(B)). Should such a situation arise, contact Shannon Twilling (twilling@email.arizona.edu, 520-621-4795).
- Geographically-specific general monitoring and discovery plans have been developed to streamline the permitting process. We would be happy to discuss the development of additional general plans and explore other possible solutions. Please contact Shannon Twilling to schedule an individual meeting (twilling@email.arizona.edu, 520-621-4795).





• What's the best time for an agency to submit a report for concurrent review in Section 106? We want to avoid situations where an earlier version that was acceptable for Section 106 needs is curated by Federal agencies but does not necessarily meet the needs of the Arizona Antiquities Act. Revisions are then requested by ASM and there are now two reports for a single project. How can we solve this problem?

Answer

We also believe that concurrent review saves time and resources for all parties.
 ASM encourages concurrent reviews to ensure that all agencies have approved
 the exact same report, however, ASM must be invited by the lead Agency to
 participate in the concurrent review process and this is not always the case,
 unfortunately. The earlier ASM receives Section 106 documents for review, the
 better.





• How will ASM be disseminating data on the accuracy of the times included in the quotes? Will the rates be stable or will ASM adjust times to complete services based on the data that is being collected and efficiencies are found?

Answer

• Since implementation of the new system (July 2018), we have been tracking data to check and adjust the time estimates we use to prepare quotes. The goal is to increase the accuracy of estimates. There will be a review of the data in 2020. This information will be made available in a final report following the review.



Questions from Tucson Forum Q&A

Question

• Is the 90-day rule for AAA Blanket Permits being enforced?

Answer

• The "90-day rule" for AAA Blanket Permits (see Rules implementing A.R.S. § 41-841, Chapter 8, Policy 8-202(A.2)) states "Only a project for which all reporting requirements, including a final report, will be completed within 90 days of the initiation of the project may be undertaken using a Blanket Permit." This rule is not currently being enforced. When enforcement is reinstated, requests for extensions will be accepted under certain circumstances.





• While doing fieldwork, we noticed human remains outside of our survey area. We were required to do a report, site card, etc. and it was expensive.

- There are no costs associated with reporting an inadvertent discovery of human remains. A report, site card, and curation fees are not required when human remains are inadvertently encountered. Please report inadvertent discoveries directly to Claire Barker in the ASM Repatriation Office (csbarker@email.arizona.edu, 520-626-0320). Do not go through the quote request system. These reports are dealt with on a case-by-case basis.
- We discussed the matter with the client and clarified the procedure for reporting inadvertent encounters with human remains at the time when the situation referenced in the question occurred. Thank you for the opportunity to provide additional clarification.

Questions from Tucson Forum Q&A



Question

• What should be done when there are inconsistencies in site boundaries between the ARO site cards, ARO maps (most often when sites are small and drawn on 1:24,000-scale USGS topographic quadrangle maps), and AZSITE? Why is the ARO still using paper maps?

- The goal is accuracy of all site records. Some of these inconsistencies are found in old reports, and we
 then have to wait for confirmation or additional details from subsequent updates to ensure accuracy of
 information that allows us to act on making site boundary changes. An email with details of a concern
 regarding ASM site boundaries can be sent to the ARO. Discrepancies between ASM site boundaries on
 ARO maps and AZSITE should be directed to the AZSITE manager.
- ASM is a curation facility that preserves archaeological data in perpetuity. Submission of site boundary shapefile data is a recent development in ARO's history and is not voluntarily provided by all stakeholders. Recording sites on paper maps and keeping electronic files, as submitted, has been the most consistent form of documentation to date. Technology becomes obsolete, paper endures. ASM is required, under state and federal law, to curate the original, paper versions of the documents. Furthermore, there is no national, industry-wide consensus regarding digital curation standards at this time (e.g., archival digital document file formats). ASM is a member of the AZSITE consortium and provides site and survey data to AZSITE. ASM provides free access to records, allowing on-site consultation of its files as well as on-line searches through LARC (http://larc.asmua.arizona.edu/vwebv/searchBasic). Records research by ASM staff and document requests are fee-based services.





Feel free to contact us any time:

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