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FROM THE PRESIDENT'S DESK

Welcome to the inaugural issue of *RPA Notes*. The purpose of this occasional publication is to disseminate information about professionalism in archaeology, activities of the Register, other matters of interest to RPAs that may be too lengthy or otherwise inappropriate for the sponsor society newsletters. Sue E. Linder-Linsley (Southern Methodist University) has graciously agreed to serve as editor, and E. Jeanne Harris is the publisher.

This first issue begins with an article by Chuck Niquette (Cultural Resources Analysts, Inc.) on the implications of the West Virginia tax code for the archaeological profession. The legal system is a good reflection of how the public perceives the status of a profession or occupation. In West Virginia, where, incidentally, I was born and raised, it is not unusual to have archaeology considered as less than a profession for taxation purposes. The article points to the need for licensing or certification requirements.

Bill Lipe (Washington State University) then discusses the Register's field school certification program. Professionalism in archaeology begins with field training, and academic field schools are the principal institution for providing such training. The need to establish standards for training students in field schools should be obvious, but it is equally clear that much variability exists. The mission of the Register's field school certification program is to establish better standards at the basic training level.

Sue E. Linder-Linsley (Southern Methodist University) reviews the guidelines for electronic communications using the Register's list servers.

Finally, Bruce Rippeteau (University of South Carolina) reviews the current status and issues surrounding the RPA archive, which is currently housed at the Institute of Archeology and Anthropology at the University of South Carolina.

Future issues will include discussions on the willingness of archaeologists to abide by agreed upon ethics and rules of conduct in day to day practice as the most significant measure of professionalism. Future issues also will include a "commentary" section for RPAs to express their views of professionalism issues in archaeology. Editor Linder-Linsley encourages RPAs to send commentary as well as articles on professionalism in archaeology to her.

Donald L. Hardesty
President RPA
University of Nevada, Reno

Archaeological Services are not a Professional Activity in West Virginia: Beware the Revenuer!

Charles M. Niquette, RPA
Cultural Resource Analysts, Inc.

The West Virginia Department of Tax and Revenue recently conducted an audit of Cultural Resource Analysts, Inc. (CRA) for the years 1997-1999. As a result, the Auditing Division concluded that CRA is not exempt from charging sales tax on the services we provide. Their conclusion was predicated on our failure to meet all four of the criteria specified by West Virginia Leg. Reg. § 110-15-8.1.1. to distinguish professional from non-professional services. While the State Legislature specifically recognizes certain professions as exempt: archaeology, architectural history and historic preservation services are not among these. Instead, the list of exempt professions includes a wide variety of business enterprises ranging from embalmers and foresters at one end of the spectrum to physicians, engineers, and architects at the other. The Department of Tax and Revenue employs the following four criteria to determine whether or not a business should be considered exempt for sales tax purposes:

1. that the activity requires either a state or national license;
2. that the level of education required for the activity is at least a Baccalaureate Degree;
3. that there be well established and recognized standards of performance that are enforced by the licensing agency or a disciplinary body under the authority of the licensing agency; and,
4. that there be well established continuing education requirements to continue holding the license (See, 110 C.S.R, Sec. 110-15-8.1.1.1).

CRA requested a determination from the Legal Division of the West Virginia Department of Tax and Revenue that historical preservation services provided by CRA constitute tax exempt professional services for West Virginia Consumer Sales and Service Tax and Use Tax (Sales Tax) purposes. The arguments used to support CRA's request for a positive legal opinion are outlined below.

BACKGROUND

CRA performs historic preservation services in West Virginia and other states for local, state, and federal governmental agencies; for-profit entities such as timber, oil and gas, and coal companies; and for architectural and engineering firms under contract with such entities and companies. These services are directly related to federal agency compliance mandated by the National Environmental Policy Act of 1969 and the National Historic Preservation Act of 1966, as amended. Moreover, CRA's services are limited to historic preservation compliance issues. Specifically, the services which CRA provides involve the identification, evaluation and appropriate treatment of historic properties eligible for or included in the National Register of Historic Places which may be adversely affected by local, state, and federal undertakings. Typically, these historic properties include archaeological sites, standing structures such as buildings and bridges, and less frequently Native American sacred sites.

In order to assist our clients in meeting their federal compliance obligations, CRA has assembled a team of professionals that offer a multi-disciplinary approach to the study and protection of historic properties. All of CRA's Project Managers and Principal Investigators hold graduate degrees and have an average of 15 years experience in the field. All of CRA's support staff hold, at a minimum, a BA degree and eight years of experience. Of the Company's 29 historic preservation professionals, 7% hold PhDs, 53% hold MA degrees, and 40% hold BA or BS diplomas. The average years of experience within these three groups are 27, 13, and 8 for the PhDs, MAs, and BAs, respectively. For additional information about CRA see <http://www.crai-ky.com>.

EXEMPTION FOR PROFESSIONAL SERVICES

West Virginia Code § 11-15-8 provides that:

The provisions of this article shall apply not only to selling tangible personal property, but also to the furnishing of all services except professional and personal services, and except those services furnished by corporations subject to the control of the public service commission. (Emphasis added).

West Virginia Code § 11-15-2(s) provides that:

“Service” or “selected service” includes all nonprofessional activities engaged in for other persons for a consideration, which involve the rendering of a service as distinguished from the sale of tangible personal property, but shall not include contracting, personal services or the services rendered by an employee to his employer or any service rendered for resale; (Emphasis added).

Thus, professional services are excepted from the tax.

The term “professional services” is defined in West Virginia Leg. Reg. § 110-15-2.65 as follows:

[¶ 63-647] Sec. 2.65. “Professional service” means and includes an activity recognized as professional under common law, its natural and logical derivatives, an activity determined by the State Tax Division to be professional, and any activity determined by the West Virginia Legislature in West Virginia Code § 11-15-1 *et seq.* to be professional. See Section 8.1.1 of these regulations.

The issue of what types of activities constitute “professional services” for West Virginia Sales Tax purposes was addressed by the West Virginia Supreme Court of Appeals in Wooddell v. Dailey, 230 SE2d 466 (West Virginia 1976).

In that case, the taxpayer argued interior decorating was a profession, exempt from the collection of the sales tax. The Supreme Court held:

Theology, law, and medicine have long been regarded without question as professions. It is indisputable that services rendered by reason of the practice of these professions are indeed professional services. However, it does not follow that Article 8, Section 21 of the Constitution of West Virginia precludes the inclusion of any other professional unless specifically mentioned by a legislative enactment. Consequently, we must reject the Commissioner’s argument that West Virginia Code, Chapter 30, dealing with various professions and occupations, should be read *in pari materia* with West Virginia Code, 11-51-1, *et seq.*, and that only the professions of theology, law, and medicine and other endeavors treated as professions in West Virginia Code, Chapter 30, can qualify to confer “exempt” or “excepted” status under the Consumers Sales and Service Act.

A legislative enactment, which uses a undefined term referring generally to professions or professional services, will and should be considered as having been used in its broadest modern technical and general sense. We consider the expressions “professional services” to have been so used in the taxing statute involved in this case. Thus, we do not limit “professional services” merely to services performed in the practice of law, theology, or medicine or in pursuit of occupations specifically recognized as professions by statute. Other professions are plainly contemplated by the taxing statute here involved. However, any other professions must be clearly established as a profession by the one who asserts that services rendered by him in connection therewith are “exempt” or “excepted” and hence not taxable. *Id.* at 469.

R P A N O T E S

Thus, the court rejected the State's strict construction of the statute, adopting a more liberal interpretation. However, the court ultimately also rejected the taxpayer's characterization of interior decorating as a professional service, stating as follows:

The difficulty encountered by the appellee Wooddell is that she assumed as proven what she was required to prove in the first instance. She assumed that she was rendering professional services as a member of a recognized profession. Merely saying it does not prove it. For example, she did not establish that she is a member of any discipline with widely accepted standards of required study or specified attainments in special knowledge as distinguished from mere skill. She did not establish any general acceptance of her occupation as a profession either within this State or elsewhere. She did not refer this Court to any case, and we have not found one, holding that interior decorating was a profession or defining the degree of skill and knowledge which must be possessed before one is permitted to classify himself or herself as being engaged in the profession of interior decorating. *Id.* at 469.

Subsequent to the West Virginia Supreme Court's decision in Wooddell, the Tax Department promulgated administrative regulations, which essentially adopt the Court's reasoning for the purpose of analyzing whether a particular activity constitutes a professional service for Sales Tax purposes. Presently, West Virginia Leg. Reg. § 110-15-8.1.1. *Professional Services* provides:

Sec. 8.1.1. Professional services, as defined in Section 2 of these regulations, are rendered by physicians, dentists, lawyers, certified public accountants, public accountants, optometrists, architects, engineers, registered professional nurses, veterinarians, physical therapists, ophthalmologists, chiropractors, podiatrists, embalmers, osteopathic physicians and surgeons, registered sanitarians, pharmacists, psychiatrist, psychoanalysts, psychologists, landscape architects, registered professional court reporters, licensed social workers, enrolled agents, professional foresters, licensed real estate appraisers, and certified real estate appraisers in accordance with West Virginia Code § 37-14-1 *et seq.*, nursing home administrators, licensed professional counselors and licensed real estate brokers. Persons who provide services classified as nonprofessional for consumer sales and service tax purposes include interior decorators, private detectives/investigators, security guards, bookkeepers, foresters, truck driving schools, hearing aid dealers/fitters, contractors, electricians, musicians, and hospital administrators, the foregoing listing is not all-inclusive but intended as containing examples of trades and occupations. The determination as to whether other activities are "professional" in nature will be determined by the State Tax Division on a case-by-case basis unless the Legislature amends West Virginia Code § 11-15-1 *et seq.* to provide that a specified activity is "professional." When making a determination as to whether other activities fall within the "professional" classification, the Tax Department will consider such things as the level of education required for the activity, the nature and extent of nationally recognized standards for performance, licensing requirements on the State and national level, and the extent of continuing education requirements.

Sec. 8.1.1.2. Services for which a professional license is required and which are provided by corporations, regardless of whether such corporations are professional or business are not subject to the consumer sales and service tax. Likewise, non-professional services provided by a professional corporation are subject to the tax.

Sec. 8.1.1.3. Professional persons who make sales of tangible personal property or who engage in activities which are not professional services shall collect consumer sales and service tax on such sales or services. For example, kennel services provided by a veterinarian are subject to tax.

Sec. 8.1.1.4. Professional services shall not be related to the quality of performance or expertise of the person performing the service. Professional, when used in these regulations, is not synonymous with excellence. It is the type of service which must be professional, not the quality or manner in which the service is performed. To illustrate: A doctor's services to his patients are professional services whether or not his patients are satisfied with his performance; or, an individual may excel at repairing television sets, but his type of service (repair of television sets) is not considered professional under these regulation even though the manner in which he performs is considered "professional" by his customers or by other television repairmen.

DISCUSSION

There is no West Virginia statute either specifically exempting historic preservation services from the Sales Tax or declaring that historical preservation service providers are professionals for Sales Tax Purposes. Similarly, there does not appear to be any judicial decision in West Virginia or of any other state court for or against the proposition. Such a result is not at all surprising given the small number of professional working in the field and uniqueness of the profession. Absent a specific statutory or judicial exemption, the regulations grant to the Tax Department the authority to make a determination as to whether activities fall within the “professional” classification. In making such determinations, the Tax Department will consider such things as:

- 1) the level of education required for the activity;
- 2) the nature and extent of nationally recognized standards for performance
- 3) licensing requirements on the state and national level; and,
- 4) the extent of continuing education requirements.

As applied to historic preservation services, the above criteria seem to support the conclusion that historical preservation services are a professional activity to the extent that the four factors can reasonably be applied to such a small and specialized profession. First, the National Park Service, in 1983, established “Professional Qualification Standards” which require an extensive level of education and experience to perform historic preservation. Second, these standards are generally nationally recognized by all Federal and state agencies which are required to comply with the National Historic Preservation Act of 1966 and have specifically been accepted by the West Virginia Division of Culture and History. Third, while there is no professional licensing of historic preservation professionals in West Virginia because the profession is too small to justify regulation, it is in effect closely regulated nationally by various federal agencies and in West Virginia by the Division of Culture and History. Finally, the principals and members of CRA regularly participate in continuing professional education. Such continuing educational activities involve participating in seminars taught by other professionals (historic preservation and the related fields of archeology, anthropology, and architectural history), reviewing professional publications, and working with other historical preservation professionals. In addition, several of the CRA principals have been and are currently officers and directors of our national historic preservation and archeology professional organizations. Based on the standards set forth above, we believe that historic preservation services must be considered a profession. Not only is there special college curriculum for the study of archaeology, history, and architectural history, but there are state-level requirements and national standards that serve as minimum qualifications required for practitioners in the industry.

Presently, there are only 35 practicing historic preservation professionals (archaeologists, historians and architectural historians) who live and work in the State of West Virginia. Of these, 14 work in the private sector. The balance is employed by universities and government agencies. Given the small size of this group it is unrealistic to expect them to influence the state Legislature to include historic preservation as a designated professional service. Similarly, it is unrealistic to expect a group of this size to establish a state-level licensing board or to require continuing education for re-certification. This being the case, the industry necessarily relies upon national standards. Moreover, the state government for the work in which we are engaged requires these same standards.

In the September 29, 1983, issue of the *Federal Register*, the following Professional Qualification Standards were published as part of the larger *Secretary of the Interior’s Standards and Guidelines for Archeology and Historic Preservation*. These Professional Qualification Standards are in effect currently, codified in 36 CFR Part 61. The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. These same qualifications are specified as minimum levels of education and experience necessary to practice historic preservation activities in the state of West Virginia as determined by the West Virginia Division of Culture and History. Historic Preservation professionals who fail to meet these qualifications are prohibited from working within the state of West Virginia. The qualifications are as follows:

R P A N O T E S

History

The minimum professional qualifications in history are a graduate degree in history or closely related field; or a bachelor's degree in history or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, teaching, interpretation, or other demonstrable professional activity with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of history.

Archaeology

The minimum professional qualifications in archeology are a graduate degree in archaeology, anthropology, or closely related field plus:

1. At least one year of full-time professional experience or equivalent specialized training in archaeological research, administration or management;
2. At least four months of supervised field and analytic experience in general North American archaeology; and
3. Demonstrated ability to carry research to completion.

In addition to these minimum qualifications, a professional in prehistoric archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the prehistoric period. A professional in historic archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the historic period.

Architectural History

The minimum professional qualifications in architectural history are a graduate degree in architectural history, art history, historic preservation, or closely related field, with coursework in American architectural history; or a bachelor's degree in architectural history, art history, historic preservation, or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.

In addition to the national standards set by the Secretary of the Interior, archaeologists may be certified by the Register of Professional Archaeologists (the Register). The Register sets a higher standard than does the Secretary of the Interior, includes a *Code of Ethics*, *Standards for Research Performance*, and a *Grievance Procedure* for those registered archaeologists who fail to adhere to the Code and Standards (also see <http://www.rpanet.org>). Articles I and II of the Register's Bylaws are pertinent to this discussion. They state:

R P A N O T E S

ARTICLE I. Purpose

Section 1. Purpose. The purpose of the Register of Professional Archaeologists (Register) is to advance professionalism in archaeology by:

- a. Identifying archaeology as a profession and qualified archaeologists as professionals;
- b. Encouraging high standards in the training of archaeologists;
- c. Establishing and encouraging high standards of performance for professional archaeologists by promoting conformance to a published Code of Conduct and Standards of Research Performance;
- d. Designating qualified individuals as Registered Professional Archaeologists;
- e. Administering grievance procedures to address questions of compliance with the Code of Conduct and Standards of Research Performance;
- f. Undertaking other activities that will serve to enhance the professional conduct and integrity of archaeological projects and research.

ARTICLE II. Registration as a Professional Archaeologist

Section 1. Requirements. Registration as a Professional Archaeologist shall be open to any applicant who fulfills the following requirements:

Provision of documentation satisfactory to the Registrar that the applicant meets the eligibility requirements established by the Board of Directors.

Agreement to abide by the Register Bylaws, the Code of Conduct, and the Standards of Research Performance and to be subject to the Disciplinary Procedures of the Register of Professional Archaeologists.

Payment of the applicable fees by deadlines established by the Board of Directors.

All of CRA's Principal Investigators and Project Managers are Registered Professional Archaeologists. Several of these employees have held office or served on committees within the organization. The Company's President, Charles M. Niquette, currently serves as the Register's Secretary/Treasurer.

In addition, historic preservation compliance activities performed by the CRA are heavily regulated by state and federal regulatory officials. These activities include three basic elements for any project and are designed to 1) locate and document archaeological and historic properties (cultural resources) that may be located in a given project area; 2) evaluate the significance of the cultural resources identified; and 3) implement appropriate mitigation measures to ameliorate project impacts to significant cultural resources. The latter might constitute data recovery (excavation) in the case of archaeological sites and a combination of measured line drawings and photographic documentation for standing structures. The work product produced by CRA for all three activities is a report, the contents of which are dictated by both the state (West Virginia Division of Culture and History) and the particular federal agency whose undertaking provided the catalysts for doing the work in the first place.

All services performed by CRA are performed as a direct result of "federal undertakings" requiring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. The regulations implementing Section 106 are specified in 36 CFR

R P A N O T E S

Part 800. For the purposes of Section 106 compliance, a “federal undertaking” is defined as:

A project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including:

- a. those carried out by or on behalf of the agency;
- b. those carried out with federal financial assistance;
- c. those requiring a federal permit, license, or approval, and;
- d. those subject to State or local regulation administered pursuant to a delegation or approval by a federal agency (16 U.S.C. 470w(7)).

Every single project in which CRA becomes involved includes a federal undertaking that meets one or more of the above criteria.

At a practical level, state and federal officials in several ways regulate services performed by CRA. First, only those cultural resource specialists who meet the professional qualifications described above are authorized to perform such work in the State of West Virginia. Secondly, the work project produced by CRA is reviewed and must be approved by government historic preservation specialists. If, for example, a report is submitted to a private sector client, the client’s approval or disapproval of the document has no relevance to the compliance issue. It is the lead federal agency, the State Historic Preservation Officer (Division of Culture and History), and less frequently the federal Advisory Council on Historic Preservation who are the key players in the regulatory process. Our reports are routinely reviewed by, for example, the US Army Corps of Engineers, USDA Forest Service, the Federal Highway Administration, US Department of Housing and Urban Development, and the US Department of Energy. If historic preservation specialists in these agencies have problems with any aspect of the report, it is revised as many times as is necessary to gain federal approval. Subsequently, the same report is submitted to the Division of Culture and History where the process is repeated. In West Virginia, Culture and History serves the roll of the State Historic Preservation Officers (SHPO). Among other duties, the SHPO is a state-level entity that has the responsibility to advise and assist federal agencies in carrying out their historic preservation responsibilities. In doing so, the SHPO reflects the interest of the State and its citizens in the preservation of their cultural heritage. It is not until all of the consulting state and federal review officials have signed off on a particular report prepared by CRA that the private sector client can obtain his permit and clearance to proceed for whatever kind of project may be contemplated.

Finally, within the state of West Virginia there are engineering firms that have departments devoted to historic preservation services. Cultural Resource Analysts, Inc., routinely competes with these firms for contracts to provide identical services. If the Company is determined not to provide “professional” services it means that all of the smaller, entrepreneurial firms like ours are placed at a competitive disadvantage. Despite the fact that we provide identical services as an engineering firm, and no engineer is involved with the execution of our collective efforts to provide historic preservation services, the engineering firm is exempt from collecting and paying sales tax. In contrast, our clients are penalized with an added 6% to the bottom line for contracting with us for the same services.

CONCLUSIONS

The West Virginia State Tax Department concluded that CRA was not exempt for sales tax purposes and, by extension, that archaeology and historic preservation services are *not* professional activities. The Department based its decision on the fact that neither the state nor the federal government requires a specific license to provide these services. While minimum levels of required education and experience may be established by the government, there is no licensing body to enforce standards of performance. The Department further reasoned that the Register of Professional Archaeologists was of no assistance because it is a voluntary organization. Employers may require that employees become registered, but neither the state nor the federal government requires a person to become registered in order to perform historic preservation services in West Virginia.

As a result of the Department’s audit and determination, CRA will be assessed for past taxes, penalties and interest accrued. Once assessed, CRA will be given 60 days to appeal the assessment. If unsuccessful, the firm has a choice of paying the debt or fighting the Department’s decision in court. If we select the latter option, the interest will continue to accrue on the taxes due until the case is resolved in our favor or the taxes are paid.

Other firms working in West Virginia are advised accordingly; if you have not collected sales tax and paid the money owed to the Department, beware the revenuer (most West Virginians are well acquainted with the concept!). If you are anticipating working in West Virginia in the future, a word to the wise should be sufficient.

There are only two ways in which a non-exempt company may claim an exemption from state sales taxes. If there is an applicable exemption that the purchaser of historic preservation services may claim, the client may provide the CRM firm with either a completed exemption certificate or a direct pay permit. In fact, many coal companies are able to provide copies of their direct pay permits. Similarly, federal agencies will have no problems in providing exemption certificates. In contrast, engineering firms routinely cannot find an applicable exemption for the purchase of CRM services. In instances where a consultant completes, for example, a transportation project for the West Virginia Division of Highways but is hired by an engineering firm, the sales tax issue would be applicable. Nevertheless, it would not be applicable in this example if the engineering firm did the archaeology in-house. For out of state engineering firms that have branch offices in West Virginia devoted entirely to historic preservation activities, the sales tax issue remains problematical.

There are a limited number of ways in which one might expect the Department to reverse its decision and to recognize archaeology as a professional activity. 1) CRA can successfully challenge the decision in court, a potentially more expensive proposition than to simply pay off the debt. 2) The members of the historic preservation community can lobby members of the State Legislature. 3) They might also ask for the Governor's assistance and intervention. 4) They might seek to establish a state licensing board and lobby the SHPO to require a license from said Board to perform historic preservation services in West Virginia.

None of these is very practical, especially because of the very small constituency involved. The most realistic solution is to enlist the assistance of historic preservation specialists on a national level, and to seek a national solution. Such a solution might include certification, a requirement for continuing education credits, and attempt to promote uniformity between states with respect to professional qualifications, compliance expectations, and standards of research performance. While this option will not help CRA, it has greater ramifications for the consulting community and would serve to provide the greatest good to the largest number of private sector CRM specialists.

I am unaware of any other state whose sales tax system is similar to West Virginia's. Despite this, the central issue here is not the parity of the West Virginia tax system. Rather, it is Reason Number 101 why we need to take our discipline to the next level and to seriously consider establishment of a national certification requirement.

Acknowledgements

The author would like to thank members of the CRA staff who provided thoughtful comments regarding this paper and more particularly, their support in preparing rebuttal documents used in the request for a legal determination from the West Virginia Tax Department. These include Mike Anslinger, Darla Hoffman, Berle Clay and Steve Creasman. I also appreciate the legal advice, support and analysis of my peculiar predicament provided by two different law firms, Jackson and Kelley and Wyant, Tarrant and Combs.

Register to Promote Field School Certification

William D. Lipe, RPA
Washington State University

The archaeological record is a unique and nonrenewable record of the past; as professional archaeologists, we have accepted the responsibility to treat this record with proper care, using methods that are appropriate to the research being undertaken and that make economical use of this basic archaeological resource. Proper training and experience in fieldwork is therefore essential to our preparation for engaging the archaeological record as professionals. For most of us, this preparation started with an archaeological field school, and certainly most members of the next generation of professionals will begin their training at a field school as well.

As Registered Professional Archaeologists, all of us have a stake in ensuring that students who aspire to become professional archaeologists are provided with a sound introduction to fieldwork when they enroll in a field school. Furthermore, as professionals, we must be concerned that students avoid field schools that exploit the archaeological record without producing any increase in knowledge or that exploit the students who enroll in them without providing sound training and experience.

For these reasons, the Register of Professional Archaeologists is moving to develop and promote a program for the certification of archaeological field schools. Such a program was established by the Society of Professional Archeologists (SOPA) not long before the transition to the Register. The Register's current field school certification procedures have simply been carried forward from those of SOPA. The overall goals of the RPA program are to establish basic standards for archaeological field schools, and to recognize field schools that meet these standards by awarding them RPA certification.

RPA President Don Hardesty has appointed a Committee on Field School Certification to do two things: 1) review applications that are received under the current program and to make recommendations regarding them to the RPA Registrar (Pat Garrow), and 2) evaluate the existing guidelines and application form and recommend modifications to the RPA board. Members of the Committee include myself as chair, Michael Adler (Southern Methodist University), Elizabeth Pena (SUNY-Buffalo), and John Doershuk (Office of the State Archaeologist, University of Iowa). Even though the RPA Field School

Certification program has not been publicized, several applications for field school certification have been received and reviewed since early April.

The purpose of this newsletter article is to inform RPAs of the existence of the field school certification program, but more importantly, to solicit comments regarding the present guidelines and application, as well as recommendations regarding how the certification program should be structured in the future. The goal, of course, is not to provide guidelines for "the perfect" field school, but to establish basic standards that are also flexible enough to accommodate a range of approaches to field school instruction in the context of well-designed research.

The current field school guidelines and standards were established by SOPA in the 1970s, and made available on an advisory basis. SOPA did not institute actual field school certification until not long before steps were underway that ultimately resulted in the de-activation of SOPA and the establishment of the Register under the sponsorship of the Society for American Archaeology, the Society for Historical Archaeology, and the Archaeological Institute of America.

NOTE: Current RPA field school certification materials are available on-line at: <http://members.aol.com/harrisrpa/notes/index.html>. Comments or suggestions should be addressed to William Lipe at: lipe@wsu.edu.

Additional Thoughts

Budding professionals are of course not the only ones served by archaeological field schools. For some students, the lesson learned from an archaeological field school is that this is not the kind of work they want to do, and they move on to other pursuits. For other students, the field school provides an opportunity to learn something about archaeology in a hands-on way, even if they do not plan to make archaeology their career. Some field schools accept adults who are interested in participating for the educational experience, rather than for college

credit. And there are a number of field schools that help avocational archaeologists become qualified to participate in field projects, or that provide an introduction to field archaeology for high school students.

In addition, there are numerous “research participation” programs, where volunteers sign on to assist in fieldwork, and receive only the training required to enable them to perform specific assigned tasks. These are usually not billed as field schools. Hence, there is a great range of motivations among students and other non-professionals who participate in field archaeology, and a great range of programs — including field schools — that involve these individuals. The Register’s Field School Certification program cannot and will not cover all these situations.

It seems apparent, however, that any student who wishes to begin to prepare herself or himself for a career involving archaeological field work should choose a field school that provides appropriate training and experience in the context of a well-designed, productive research project. Identifying and certifying such field schools is a worthy task for the Register to undertake. If our certification program is successful, it cannot fail to have a positive influence on field schools (and perhaps on “field school-like” programs) in general.

It is also recognized that some professional archaeologists work exclusively with existing collections or records and that registration of such professionals needs to be considered by RPA. The existence of a Field School Certification process does not imply that all archaeologists must necessarily achieve the same level of fieldwork expertise in order to become registered. Nonetheless, most archaeologists supervise field projects at some time in their career, a majority build their careers around this activity, and even those who work largely or entirely with collections or non-artifactual specimens often find that field experience provides them with a better understanding of the contexts from which their research materials come. The point is that adequate field training is an essential part of becoming a professional for most archaeologists, field schools are where this training usually starts, and establishing and promoting standards for field schools is an appropriate and important task for the Register to undertake.

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George (Rip) Rapp, Jr. (1999-2000)
Laurie V. Slawson (1999-2001)

Standards Board Alternates

Jay Newman (2000-2002)
Leslie E. Eisenberg (1999-2000)
Roberta Greenwood (1999-2001)

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RPA Electronic Communication Overview

Sue E. Linder-Linsley, RPA
RPA List Serve Administrator

Please read and save this article near your computer for future reference.

After careful consideration of all our options we have come up with a solution for fast efficient communication among all RPA's. The option will reach all registered archaeologists with RPA Board announcements and important information while also allowing only those registered archaeologists who choose to participate in open discussions the opportunity to do so. This is the best no cost solution and is a benefit of RPA registration. This first issue of *RPA Notes* was distributed as a pdf attachment to a message posted to the RPANEWS list. If you have comments about the new *RPA Notes*, join the RPA list and let us know what you think.

We now have two lists which work together to provide no more than 1-2 messages a month to everyone but at the same time send many daily messages to those who choose to participate in discussions.

1) The first list is called **RPANEWS**. *RPA Notes*, the occasional newsletter for the Register, will be distributed via the RPANEWS list (2-3 times per year). It is a moderated list; all messages to the list have to be approved, but all subscribed RPAs can post messages. This list is only for brief Announcements, Register wide Requests, and Board Reports. No opinions or discussion will be allowed on the list. Messages sent to RPANEWS may be redirected and posted on the RPA discussion list instead. The RPANEWS list may also contain summaries of key issues from the on going discussions on the RPA list. Hopefully, this will limit the number of messages on this list (RPANEWS) to only a couple per month. Everyone has initially been put on this list and given instruction as to how to get off the list (see the message previously sent with SAVE THIS MESSAGE in the header). After you read this message you may choose to unsubscribe from the list.

If you choose to unsubscribe because you do not want any electronic correspondence from RPA, the request will be noted in the RPA database. These individuals effectively will have no e-mail address or correspondence. Any RPA who has their record in the database marked that they want no electronic

correspondence will not be able to simply subscribe to RPA or RPANEWS in the future. These individuals must contact the RPA office to have their record modified and will be added to RPANEWS with the next scheduled update. Registered archaeologists who have requested to be removed from the RPANEWS list will not receive copies or notifications of future *RPA Notes*. *RPA Notes* can be downloaded from the web site by anyone.

2) The second list is called **RPA**; it is a discussion list. RPAs must demonstrate their ability to use listserve commands by subscribing themselves. By subscribing yourself to the list, you are acknowledging that you understand how to subscribe and unsubscribe, and agree not to send listserve requests to the entire list. RPAs can subscribe and unsubscribe as frequently as they like (but for security reasons each request will still have to be approved). Instructions for subscribing to the RPA discussion list are at the end of this article. In order to streamline the process, this list will automatically accept all subscriptions until November 1, 2000. On November 1, 2000 all subscribed addresses will be checked against the paid registration roll, and any not listed will be removed. After November 1 the approval process will be in place for subscription.

EXAMPLES:

In theory the two lists would work together to enhance communication between professional archaeologists.

If the SOPA/ROPA issue had been discussed using the two list system:

1) the RPANEWS list would have a message that SOPA is considering becoming ROPA; for details and discussion, please see the RPA discussions. No other messages would be posted until the final proposal was ready for individual consideration.

2) the RPA list would have messages from board members, pros, cons, options, questions, responses and all the general discussion that went on. Only RPAs who chose to subscribe would be involved in this exchange of ideas.

R P A N O T E S

A current example might be:

1) RPANEWS: New 106 Regs are available at <http://www.....> (short to the point information).

2) RPA: discussions about the changes how these will affect us (what we really need to know). Opinions about the regs, questions about how to implement them, etc.

Based on e-mail responses, the vast majority of RPA's seemed to want a listserv where they can communicate. If we get a large number of RPAs who do not want to be on the RPANEWS list, we all need to be very concerned. It is understandable that no one including myself wants his or her mailbox flooded with "list serve request" messages and does not have time to participate actively in discussions all the time. Anyone who wants to be called a "Professional" and does not want to be made aware of pertinent issues affecting the profession is going for the label and is missing out on being part of the profession. The RPA and RPANEWS lists are benefits of RPA registration. Registration dues must be paid for the current year and processed by the RPA office before subscription to either list will be approved.

The RPA Board encourages everyone to select to stay on the RPANEWS list, and whenever possible to join in the discussions on the RPA list.

Joining The RPA Discussion List

First you must agree to the following:

“By subscribing to the RPA list I acknowledge that I understand how to send listserv commands. I will send all listserv commands to:

majordomo@mail.smu.edu (including subscribe, unsubscribe, who, info, and help)

or

I will ask for help from the RPA and/or RPANEWS list administrator at slinder@mail.smu.edu.

I will not send messages to the entire list (rpa@mail.smu.edu or rpanews@mail.smu.edu) that contain any requests to get on or off the list. I will responsibly send messages and act as a

professional when expressing my personal opinions. I will not knowingly send messages to the list that will spam everyone and turn small distribution problems into large ones. I understand that I will be removed and denied further access to the RPA electronic discussion list if I cannot send command messages to the correct recipient (i.e., majordomo@mail.smu.edu or slinder@mail.smu.edu).”

To subscribe to the RPA discussion list send an email message to:

majordomo@mail.smu.edu

Type the following single line in the message area:

subscribe rpa <your e-mail address>

To post a message to the RPA discussion list for distribution to everyone, send the message to:

rpa@mail.smu.edu

To obtain a copy of the instructions:

majordomo@mail.smu.edu

with the following single line in the body of your message:

info rpa

or

info rpanews

send any questions concerning the list to slinder@mail.smu.edu. If you have questions or comments concerning the above message, send them to the rpa list (rpa@mail.smu.edu) and they will be answered on the list.

[**Note:** All characters in the following email addresses are lower case: rpa@mail.smu.edu, rpanews@mail.smu.edu, or majordomo@mail.smu.edu.]

Archiving the Register of Professional Archaeologists Personnel and Administrative Records

Bruce Rippeteau, RPA
RPA Archivist

The past administrative and individual personnel records of the Register of Professional Archaeologists are carefully maintained in an official RPA Archive at the South Carolina Institute of Archaeology and Anthropology (SCIAA). The Institute is a research unit of the University of South Carolina and a state agency responsible for the largest public land area in the state pursuant to three state acts. The RPA Archive is pursuant to a 21 April 1994 Memorandum of Agreement between Larry Banks, President (of RPA's predecessor The Society of Professional Archeologists) and Bruce Rippeteau, Director of SCIAA.

The Archives currently consist of 12 nearly-full standard black 4-drawer file cabinets, under multiple drawer and door locks, in a windowless vault immediately adjacent to my office on the second floor of a fire-resistant, masonry, headquarters structure, which is 1 of our 3 (there are several more statewide) Institute buildings on or near the campus of USC in downtown Columbia. This Archive also curates some of the Institute's long-term historical and administrative documents and the archives of several other organizations including the Piedmont Chapter of the Explorers Club.

The RPA Archives are the property of RPA as are the file cabinets that have been purchased on an as needed basis for the Register. They are all key locked and as set forth by the 1994 MOA, access may be given only to the President, and certain officers including membership and the Grievance Coordinator as expressly authorized by the President of RPA.

The main purpose of the Archives is to preserve the records of the Register. Currently there are 1200+ individual folders with information on members/past members and the additional 1000+ folders of bulk documentation. Occasionally, the records are searched for membership or history facts, and rarely for some Board or Officer facts.

I. Archive Cost

Costs of this service are exceptionally low and include the cost to purchase the file cabinets and folders (and

miscellaneous labels, staples, etc.) plus secretarial wages for several hours per year. The secretarial work is conducted under oath and personally carried out by my long-time Secretary Ms. Jacqueline Newton. My oversight, administration, and the floor space in the vault are *pro bono*. This contribution continues a long-term personal interest in the support and administration of SOPA (and now RPA) which began with committee and Board terms (1978-1980 *inter alii*) many years ago.

II. Archive Management

The current management status is that 1) all personnel and many administrative files are placed in archival quality folders (acid free), 2) labeled (with stapled and contact adhesive labels), 3) placed in new locked and RPA-labeled file cabinets, 4) housed in a locked vault room, 5) whose keys themselves are locked for only Bruce Rippeteau and his secretary Jacqueline Newton's use, and 6) file access is totally restricted to RPA purposes as authorized by the MOA and RPA President in written form.

In a broader view, when the files received they are reviewed for organizational logic and filed as part of one of the following categories: a) Individual Membership /Application Files (the bulk of the current cabinets), b) Grievance Files (basically miscellaneous ones), c) Fiscal Files (basically miscellaneous, dating back to the early 1970s, and consisting of bank statements, deposit slips, returned checks, etc.), d) Correspondence (to include special election data; all basically miscellaneous), or e) "really" Miscellaneous File items (only about 1/3 of a drawer).

The majority of the effort is needed to sort and then file everything. For example, all personnel records need attention, but some of the less critical items such as bank statements do not. However, these latter cases are not strictly, "archived," and many are already past any IRS etc., need to retain. Stapling the labels on is mandatory as the glue is known to ultimately fail, and, indeed many of the labels may be falling off when submitted for archiving.

R P A N O T E S

The Archives are in an office-environment of stable, nominal humidity and temperature fluctuation, fire-free, and high security. The acid-sink issue is also nominal. The RPA papers are not treated for acidity (this would be an exceptional high cost of low benefit), but are kept mechanically stable, and placed in the archivally-standard acid free folders which create an isolated, buffered seclusion. This should all be good for at least 50 years, some 6 years having elapsed since initial archiving. The Board has, to date, not requested additional conservation or preservation efforts since these are still (in effect) working files for personnel use.

The Archives are “checked” weekly by Ms. Newton and myself, and accessed monthly or quarterly for the update and addition of newly received materials. All files in the vault are “inspected” in June and December.

III. Quality and Security Compromise to Archive

The one, and only one, incident was early on, on 22 June 1994. During the first set up and upgrading to archival folders, our staff noticed (for the first time ever in the vault) little bugs! These little guys were immediately identified as Paper Lice. That

afternoon they were introduced to a professional exterminator, who’s action totally solved the problem.

I investigated and determined that the source of the bugs was not our SCIAA et al. Archives or (then-) SOPA’s newly received materials, BUT RATHER (all hail: dark humor) the shipping boxes of the new archival folders!

The oversight and response to this 1994 incident shows our attention and clear diligence with response to the Archive context.

There have been no other situations of conditional or security breaches to the RPA Archives.

IV. Archive Future

The SCIAA headquarters will be moving to a new building sometime in the next decade. All files therein including the RPA Archives will receive the same high care and physical security in the new facility.

I anticipate the ability to maintain the Archives at SCIAA for the immediate future, and am pleased to continue as long as the Board of RPA wishes.

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RPA NOTES©

is a publication of the Register of Professional Archaeologists. Our fundamental goal is to advance professionalism in archaeology by the establishment and acceptance of universal standards.

The purpose of RPA Notes is to provide members with the latest information on the organization's activities.

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