



City of Longview

1525 Broadway
Longview, WA 98632
www.ci.longview.wa.us

Special Meeting Agenda

Site Visit- Meet at Longview Library
Parking lot Entrance 1600 Maple Street

5:10 pm

Site Visit- Meet at Lake Sacajawea Park,
Kessler and Hemlock St (Hemlock Plaza)

est. 6:00 pm

To attend virtually please use this link:

<https://us02web.zoom.us/j/88246281771?pwd=Um53NmN3TUIvOERJTEUwTjIuQXI4Zz09>

Meeting ID: 882 4628 1771 Passcode: 1923 For
dial in audio call: +1 408 638 0968 US (San
Jose) +1 669 900 6833 US (San Jose) or +1
253 215 8782 US (Tacoma)

Historic Preservation Commission

Monday, August 30, 2021

5:10 PM

Small Conference Room, City Hall

1. **ROLL CALL**

2. **APPROVAL OF MINUTES**

21-000928 Minutes of the July 26 regular meeting

3. **CONSTITUENT COMMENTS**

4. **BOARD MEMBER COMMENTS**

5. **REPORTS**

21-000930 Reports from Staff
Grant Committee Reports (or see item under un-finished business)

6. **UNFINISHED BUSINESS**

21-000929 Grant Subcommittee request for authorization. Rename to 'FY2022 CLG Grant Working Group' and various requests to execute the grant scope of work. Please see attached request from Arthur. Full grant application attached for reference.

Recommended action: review the request and motion to approve the FY2022 CLG Grant Working Group to proceed as outlined.

7. **NEW BUSINESS**

8. **ADJOURNMENT**

Minutes

Agenda

In-person at Longview Council Chambers, 1525
Broadway Street

Or Virtual on zoom: Join Zoom Meeting

<https://us02web.zoom.us/j/88246281771?pwd=Um53NmN3TUlvOERJTUwTjlUQXI4Zz09>

Meeting ID: 882 4628 1771 Passcode: 1923

Historic Preservation Commission

Monday, July 26, 2021

5:30 PM

Small Conference Room, City Hall

1. **ROLL CALL**

Meeting called to order at 5:31 p.m.

In attendance

Members: Cam Hanna, Chairman; Arthur Chang; Gary Nordin; Russel Strobel; Nthanael Light, Jason Hanson, Co-Chair; Jonell Day Kenagy

Staff: Adam Trimble, Interim Planning Manager; Nancy Vandehey, Admin Assistant; Lisa Hedgpeth, Library Specialist

Guest: Larry Wilhelmsen

2. **APPROVAL OF MINUTES**

21-000879 Minutes of the June 28, 2021 Regular Meeting

A motion was made by Arthur Chang, seconded by Nathanael Light, that the minutes be approved. Passed unanimously.

3. **CONSTITUENT COMMENTS**

None.

4. **BOARD MEMBER COMMENTS**

Nancy Vandehey answered Jonell Day Kenay's question on the agenda stating the meeting room as Small Conference room and meeting being held in the Council Chambers. Currently we are offering meetings in hybrid format (in-person and via Zoom). To accomplish this we need the equipment in the Council Chambers. We will continue in this format until the hybrid meeting requirement changes.

Arthur Chang inquired if he should discuss the library grant now or under Reports. Adam Trimble stated that it should be discussed under Reports and it was an error with the agenda that it wasn't listed.

5. **REPORTS**

- *Main Street Program - Adam explained that currently the City is an affiliate member. The goal would be to work with a non-profit such as CEDC or Downtowners to take over this task of becoming a full member..*
- *Lake Sacajawea Project Update - Adam spoke with Ivona Kininmonth, the Engineer assigned to work on this project. The project will include work on sidewalks, remodel or replace the bathrooms and Martin's Dock.*
- *CLG Library Grant - Arthur looked at the plans in the library to digitize. He'll need to return to get a full inventory to prioritize with limited funds. The Library is excited to host a permanent centennial display. The funds have not been distributed yet. He asked if the group would like to create a sub committee. Lisa Hedgpeth will be the liaison with the Library to assist with access and resources. She will not be involved in*

grant administration. A discussion on issues and past complications was had and the group agreed a sub committee would be best. A motion was made by Jonell Day Kenagy to create a sub committee with HPC members to evaluate and make decisions regarding website content. Arthur Chang seconded this with an addendum to include making decisions on the digitalization process. There was a discussion but no vote was called.

Arthur Chang made an amended motion, seconded by Jonell Day Kenagy, to create a sub committee of interested parties to come back to HPC with recommendations on what powers they can be given, freedoms and latitudes, and decision making abilities regarding the grant.

Funds need to be spent by the end of 2022. A timeline with progress checkpoints will be created.

Gary Nordin, seconded by Jonell Day Kenagy, made a motion to limit the sub committee to 3 members. This passed unanimously.

The sub committee members will be: Arthur Chang, Nathanael Light, and Cam Hanna.

Russel Strobel mentioned that he attended a sale by Matt Gorley, where 3 original city layouts were being sold. Cam Hanna does not have an original plot, but a book of plots. Lisa Hedgpeth stated that she couldn't confirm or not if there was one at the Library or not. Jonell Day Kenagy was also at an estate sale where Matt may have picked up these items and there was an amazing collection of local items, and she was grateful that Matt was able to pick up some amazing stuff.

6. UNFINISHED BUSINESS

21-000877 CA 2021-3 TYNI Building Rehabilitation project (special valuation)

STAFF RECOMMENDATION:

Motion to adopt the findings and recommendations of the Staff Report and approve the Certificate of Appropriateness CA 2021-3 with the requirement that

- 1. All replacement windows have exterior grilles with an approved profile (and interior grids to match on all Commerce facing windows)**
- 2. All paint colors shall be submitted for design review unless matching or touching up existing colors.**
- 3. All work, products and receipts shall be documented and presented to the commission monthly for approval of Special Valuation .**

Larry Wilhelmsen asked for an explanation about the tax break he would receive for this project. It was explained that the county would not assess the property improvements associated with this project for 10 years for tax purposes. Adam Trimble reviewed the agenda packet item with the group, starting with the Staff Report on page 15. He pointed out that half-colonial style windows were not mentioned in the report. However, they would be appropriate for the side windows. Cam Hanna questioned the color of black for the front windows. Larry confirmed that they would be black on the outside and white on the inside. It was confirmed that the sheen would be more of a satin appearance. Jonell had to leave the meeting at this time. Arthur Chang pointed out that the group decided at the site visit that black uppers would closely match the mezzanine windows that are black now. A question about safety requirements for the windows was posed, but that would fall under building codes and be evaluated by staff.

Arthur Chang made a motion to approve, as submitted with an addendum that half-colonial style windows on the sides of the building would be allowed, if the owner decides. Gary Nordin seconded and it passed unanimously.

7. NEW BUSINESS

None.

8. ADJOURNMENT

Gary Nordin, with a second from Russel Strobel, made a motion to adjourn the meeting at 6:53 p.m.

Historic Preservation Commission Sub Committee Request for Authorization to:

- Rename sub-committee to “FY2022 CLG Grant Working Group”.
- Speak and act on behalf of the Historic Preservation Commission when interacting with the public and media outlets regarding authorized subcommittee activities.
- Work with City representatives to comply with the DAHP grant contract, including, but not limited to:
 - The creation of any and all required reports and records.
 - Compliance with publication guidelines.
 - The submission of required “check-in” materials to DAHP.
 - The submission of the reimbursement request to DAHP.
- Select third party service providers and to direct City representatives to enter into contract with selected service providers on behalf of the sub committee.
- Evaluate third part service provider deliverables for quality and completeness.
- Direct City representatives to dismiss or break contract with third party service providers.
- Disburse up to \$250 of the Historic Preservation Commission’s city allocated budget to third party service providers.
- Act on behalf of the Historic Preservation Commission to solicit city planning documents of interest from public and private entities.
- Nominate and make final determination as to which heritage objects will be digitized using for the purposes of the CLG grant.
- Collaborate with Longview Public Library representatives and any other stakeholders to effect the digitization of selected heritage objects.
- Generate a report on heritage objects of interest not selected for digitization at this time with the intent of directing future commission activities.
- Effect the creation of a website to represent the Historic Preservation Commission including, but not limited to, the determination of:
 - A domain name and service provider.
 - Required technical packages and service.
 - Website design and logo.
 - Website structure, initial content, and publishing guidelines.



Certified Local Government Grant Application

I. Applicant (Please carefully review the Application Instructions before completing the application.)

Name of Local Government: City of Longview

Mailing Address: 1525 Broadway Street Longview, WA 98632

Grant Contact: Adam Trimble

Phone: 360.442.5092

Email: adam.trimble@ci.longview.wa.gov

II. Grant Category

☐ Survey & Inventory ☐ Register nomination ☐ Planning ☒ Education

☐ Reconnaissance

☐ Intensive # of new or updated forms:

III. Project Summary (summarize your project in a few sentences)

The proposed project will increase public access to and appreciation of the City of Longview's original 1923 planning drawings through digitization and by establishing a permanent web presence for the Longview Historic Preservation Commission. Much of Longview's cultural identity stems from the City's beauty, proximity to both nature and urban centers, and overall quality of life. Yet no aspect of Longview's quality of place was accidental: meticulously planned before a single stone was laid, Longview's future growth and success is irrevocably tied to its past. These planning documents are essential to preserving and appreciating the foundations upon which the City of Longview was built.

*These fields will auto-populate from the budget sheet. They are not editable.

Grant Amount Requested: \$ 3,300

Match Amount: \$ 2,075

Total Project Cost: \$ 5,375

IV. Project Description

Organize your description in the following order (see instructions for more info):

- a. Introduction (includes local government goals & objectives)
- b. Project Description
- c. Statement of Need
- d. Project Objectives
- e. Maps, photographs, or other supporting documentation may be included as attachments. Please include them in the hard copies and the digital PDF submission.

*500 word maximum for each text box

a.) Introduction

FY2022 CLG grant funds will be used to digitize the original 1923 physical plans for the City of Longview and to create a permanent web presence for the Longview Historic Preservation Commission to display and promote these and other objects of cultural heritage. By increasing public access to and awareness of these objects, the project will be advancing the City of Longview's 2019 Comprehensive Plan's historic preservation goal HP-A to "Achieve state and national recognition of Longview's unique place in the history of American city planning" and policy HP-B.3.1 to "Promote preservation of local historic properties and materials as desirable for public awareness concerning the City's beginnings and its uniqueness in City [sic] planning history, aesthetic appreciation of architecture and landscape architecture, maintenance of community identity, and furtherance of tourism and economic activity."

Digitization of these heritage objects also aligns with the Longview Municipal Code's statements that "Historic assets are an integral part of the heritage, education and economic base of the city and the economic, cultural and aesthetic standing of the city can only be maintained and enhanced by conserving its heritage and by maintenance of its cultural assets"(LMC 16.12.010(1)(b)) and that the City's historic resources "Foster civic pride in the accomplishments of the past and a sense of identity based on the city's history." (LMC 16.12.010(2)(c))

Digitization is essential for preservation and accessibility. Digitization provides a backup in case of loss of the physical resources as well as reduction in risk of damage to the objects themselves through reduced handling and time outside of archival storage. These objects are only available to the public in person and by appointment, limiting the public's exposure to a fascinating aspect of the city in which they live.

b.) Project Description

The City of Longview has identified at least nine hand drafted paper plans from the original 1923 city plan created by Hare & Hare of Kansas City, MO and will use grant funding to engage the services of a professional print shop to scan and digitize the plans according to best archival practice. The resulting digital resources will be cataloged and stored in the Longview Public Library's existing Digital Archive.

Grant funding will also be used to secure a web domain and web hosting services for a five year period and to contract with a professional web designer to create a permanent web presence for the Longview Historic Preservation Commission (HPC). The website will serve as an outreach and educational tool to promote Longview's historic heritage, especially in light of the City's upcoming centennial in 2023. Furthermore, the website will serve both as a geo-redundant backup and as an interactive exhibit of the digitized resources.

IV. Project Description Continued

Previous CLG grants enabled the City to hire a consultant to research the original master plan relating to the registry listed Lake Sacajawea. The resulting report provides context to the 1923 city plans in the form of a brief local history, select biographies, and memorable anecdotes. The website will provide a space to combine the newly digitized heritage objects with past efforts to document the City's history in a way that will increase the visibility of both.

As a part of the 2023 City Centennial, the HPC intends to create a public exhibit featuring reproductions of some or all of the 1923 city plans alongside appropriate historical context. Though the exhibit itself is outside the scope of this grant, digitization allows the public to interact with full size physical reproductions while protecting the originals.

c.) Statement of Need

While the 1923 city plans are part of the Longview City Library's physical collection, the size of the objects has prevented archival quality digitization. The Library recognizes the need for digitization, but the equipment owned by the City is either unable to handle objects of this size, or is not designed to handle fragile, archival objects. Non-contact scanning techniques present no danger to the object undergoing digitization and are routinely used by museums to document their collections. These services are substantially more expensive than non-archival techniques.

Currently, only one of the nine identified objects is included in the Library's digital archive, and at a relatively low resolution. The lack of a digital record places these documents at risk: they are large and stored rolled, which increases the likelihood of damage during viewing and handling. Physical reproductions of the objects may exist in public or private collections, but they would be cyanotype or diazo facsimiles with less fidelity and a significantly reduced archival lifespan. Taking action now will allow future generations access to the heritage objects in the best possible condition.

The website will provide a platform for community engagement and education specific to the goal of increasing public awareness of the historic value of the City of Longview. The design and architectural limitations posed by the City of Longview's official website pose a barrier to the desired outcome for the Longview Historic Preservation Commission's website. Furthermore, the City has no staff web designer, necessitating the use of a web design service.

The City would accept partial funding for the digitization of the heritage objects, but a web presence is required to meet the goals of public education and engagement.

d.) Project Objectives

Objectives of archival digitization of the 1923 city plan and creation of a website for the Longview Historic Preservation Commission include:

The creation of a digital record of the extant heritage objects to preserve and protect from loss or damage;

The securing of access to these specific digital resources in advance of the 2023 City Centennial;

An increase in public access to, and awareness of, these heritage objects and their cultural significance;

The fostering of a public interest in local history and preservation of all cultural heritage, not limited to historic properties;

The use of the grant process as a learning opportunity for the Historic Preservation Commission;

The creation of momentum and excitement around preparations for the 2023 City Centennial.

V. Project Schedule

List each proposed grant activity separately estimating the start and completion dates. A start date and completion date are not sufficient for the Schedule of Project Completion. This should be a complete listing of all potential activities associated with the grant including appropriately timed check-ins or draft submittal (please think about your project and if drafts or a check-in is appropriate. There should be 14 days for draft review of all reports, documents, publications, HPI forms etc.). Mandatory check-in dates are April 29 and July 15, 2022 unless you specify otherwise. Final projects must be turned in by September 1, 2022. Final reimbursement requests must be in by September 30, 2022.

Work to be Accomplished	Start	Finish
Locate and identify all relevant heritage objects	10/1/21	10/31/21
Consult with stakeholders and secure physical access to objects	10/1/21	11/15/21
Select digitization service provider	10/1/21	11/15/21
Digitization service provider completes digitization	11/15/21	8/5/22
Digital resources submitted to Longview Public Library	11/15/21	8/31/22
Web domain, web hosting, and design service selection process	10/1/21	10/31/21
Web domain and host secured	10/31/21	11/5/21
Website design draft submitted to HPC, draft review	1/3/22	1/24/22
Website design service submits second draft to HPC, draft review	4/1/22	4/25/22
Final website design and review process	7/1/22	8/1/22
Final approval from City Legal Department and HPC to publish website	7/1/22	8/1/22

VI. Project Budget

All "Total" boxes will auto calculate and are not individually editable.

Salaries/Volunteer Time

	Federal share	Hard Match	Soft Match	Total
Interim Planning Manager (10hr @ \$31)		\$ 465		\$ 465
Volunteer (50hr @ \$27.21)			\$ 1,360	\$ 1,360
				\$ 0
Indirect % (if applicable): 10				
Total:	\$ 0	\$ 465	\$ 1,360	\$ 1,825

Goods & Contract Services

	Federal share	Hard Match	Soft Match	Total
Digitization	\$ 500	\$ 250		\$ 750
Web Domain and Hosting, 5 yr	\$ 1,300			\$ 1,300
Web Design	\$ 1,500			\$ 1,500

Materials/Supplies/Equipment

			\$ 0
			\$ 0
			\$ 0

Travel/Other

			\$ 0
			\$ 0
			\$ 0

Total Goods & Contract Services:	\$ 3,300	\$ 250	\$ 0	\$ 3,550
---	----------	--------	------	----------

	Federal share	Hard Match	Soft Match	Total Project Cost
Total Funding Request:	\$ 3,300	\$ 715	\$ 1,360	\$ 5,375

VII. CHECKLIST – Due by April 26, 2021

To assure that your grant proposal is complete, please check off that you have included the following:

- ☐ One completed **UNSTAPLED paper copy** of the application with the three signature attachments and any supplemental materials included mailed to DAHP, Attn. Kim Gant, PO Box 48343, Olympia, WA 98504-8343
- ☐ One completed **digital copy** of the three signature attachments and any supplemental information included emailed to Kim Gant at kim.gant@dahp.wa.gov ***
- ☐ Written documentation for federally approved indirect cost rate, if applicable.
- ☐ Written justification for volunteer rates, if applicable
- ☐ **One** signed original Statement of Understanding for Grant Management Requirements (Attachment 1)
- ☐ **One** signed original Assurance of Compliance with the U.S. Department of the Interior Regulations under Title VI of the Civil Rights Act of 1964 (Attachment 2)
- ☐ **One** signed original Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion Form (Attachment 3)

ATTACHMENT 3A

U. S. DEPARTMENT OF THE INTERIOR CIVIL RIGHTS ASSURANCE

As the authorized representative of the applicant, I certify that the applicant agrees that, as a condition to receiving any Federal financial assistance from the Department of the Interior, it will comply with all Federal laws relating to nondiscrimination. These laws include, but are not limited to: (a) Title VI of Civil Rights Act of 1964 (42 U.S.C. 2000d-1), which prohibits discrimination on the basis of race, color, or national origin; (b) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794), which prohibits discrimination on the basis of handicap; (c) the Age Discrimination Act of 1975, as amended (42 U.S.C. 6101 *et. seq.*), which prohibits discrimination on the basis of age; and applicable regulatory requirements to the end that no person in the United States shall, on the grounds of race, color, national origin, handicap or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity conducted by the applicant. THE APPLICANT HEREBY GIVES ASSURANCE THAT it will immediately take any measures necessary to effectuate this agreement.

THIS ASSURANCE shall apply to all aspects of the applicant's operations including those parts that have not received or benefited from Federal financial assistance.

If any real property or structure thereon is provided or improved with the aid of Federal financial assistance extended to the Applicant by the Department, this assurance shall obligate the Applicant, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended or for another purpose involving the provision of similar services or benefits. If any personal property is so provided, this assurance shall obligate the Applicant for the period during which it retains ownership or possession of the property. In all other cases, this assurance shall obligate the Applicant for the period during which the Federal financial assistance is extended to it by the Department.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Applicant by the Department, including installment payments after such date on account of applicants for Federal financial assistance which were approved before such date.

The Applicant recognizes and agrees that such Federal financial assistance will be extended in reliance on the representations and agreements made in this assurance, and that the United States shall have the right to seek judicial enforcement of the assurance. This assurance is binding on the Applicant, its successors, transferees, assignees, and subrecipients and the person whose signature appears below who is authorized to sign this assurance on behalf of the Applicant.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
APPLICANT/ORGANIZATION	DATE SUBMITTED
APPLICANT/ORGANIZATION MAILING ADDRESS	BUREAU OR OFFICE EXTENDING ASSISTANCE

DI-1350
(REV 6/91)

ATTACHMENT 3B

STATEMENT OF UNDERSTANDING FOR GRANT MANAGEMENT REQUIREMENTS

- CLGs receiving HPF grant assistance must fulfill the terms of their grant agreement with the state and adhere to all requirements of the National Register Programs Manual. This requirement includes compliance with Title VI of the Civil Rights Act of 1964, 78 Stat. 241, as amended, which provides that no person on the grounds of age, race, color, or national origin shall be excluded from participation in, be denied the benefits of, or be subject to discrimination under any activity receiving Federal financial assistance.
- Local financial management systems shall be in accordance with the standards specified in OMB Circular A-128, "Standards for Grantee Financial Management Systems."
- Indirect costs may be charged as part of the CLG grant only if the CLG subgrantee meets the requirements of the manual. Unless the CLG has a current indirect cost rate approved by the cognizant federal agency, only direct costs may be charged.
- Grant recipients must maintain auditable financial records in accordance with the General Accounting Office's Standards for Audit of Governmental Organizations, Programs, Activities, and Functions.
- The CLG subgrantee will provide, with request for reimbursement, documentation to support billings (time sheets, front and back canceled checks, etc.) for federal and non-federal share claimed.
- Repayment will be made to the SHPO organization if terms and conditions of the subgrant agreement are not followed or costs claimed are disallowed following audit.

CLG

SIGNATURE OF APPLICANT

TITLE

DATE

ATTACHMENT 3C

U.S. Department of the Interior

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion

Lower Tier Covered Transactions

This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 43 CFR Part 12, Section 12.500, Participants' responsibilities. The regulations were published as Part VII of the May 26, 1988 Federal Register (pages 19160-19211). Copies of the regulations are included in the proposal package. For further assistance in obtaining a copy of the regulations, contact the U.S. Department of the Interior, Acquisition and Assistance Division, Office of Acquisition and Property Management, 18th and C Streets, N.W., Washington, D.C. 20240.

(BEFORE COMPLETING CERTIFICATION, READ INSTRUCTIONS ON NEXT PAGE)

- (1) The prospective lower tier participant certifies, by submission of this proposal that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Name and Title of Authorized Representative

Signature

Date

Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered and erroneous certification, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
4. The terms "covered transaction," "debarred," "suspended," "ineligible," "lower tier covered transaction," "participant," "person," "primary covered transaction," "principal," "proposal," and "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the Nonprocurement List (Tel.#).
8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.