



## Frequently Asked Questions

October 2014

When referring or writing about the program, please use the variants listed below:

- *U.S. Ambassadors Fund for Cultural Preservation*
- *U.S. Ambassadors Fund for Cultural Preservation (AFCP)*
- *AFCP*
- *USAFCP (overseas)*
- *the Ambassadors Fund*
- *the fund*

Always good to begin with the full name, then switch to AFCP, the Ambassadors Fund, or the fund later on in the text. If using AFCP, be sure to include it in parentheses the first time you mention the program (second bullet above).

### General Questions about the Program

#### **Q: What is the Ambassadors Fund?**

A: The U.S. Ambassadors Fund for Cultural Preservation is a program internal to the State Department which is administered by the Bureau of Educational and Cultural Affairs, Cultural Heritage Center. The program awards grants through U.S. embassies in developing countries for the preservation of cultural sites, cultural objects and collections, and forms of traditional expression, such as music and language.

Short form: AFCP awards grants through U.S. embassies for the preservation of cultural heritage of developing countries.

#### **Q: How long has the Ambassadors Fund been around?**

A: The Ambassadors Fund has been around since October 2000. It funded its first round of projects in Fiscal Year 2001. As of August 2014, the fund has provided support for more than 850 projects to preserve cultural heritage in more than 125 countries.

#### **Q: Who created it?**



# U.S. AMBASSADORS FUND for CULTURAL PRESERVATION



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A: Congress created the Ambassadors Fund in October 2000. In creating the program, Congress noted—

*Cultural preservation offers an opportunity to show a different American face to other countries, one that is non-commercial, non-political, and non-military. By taking a leading role in efforts to preserve cultural heritage, we show our respect for other cultures by protecting their traditions. (P.L. 106-553)*

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In the Senate Report 106-404 (page 138) tied to P.L. 106-553, the Senate noted—

*Too often, U.S. assistance to underdeveloped nations is either invisible to all but a handful of bureaucrats or appears to benefit us at the expense of the recipient country. The Committee believes that cultural preservation offers an opportunity to show a different American face to other countries, one that is non-commercial, non-political, and non-military. By taking a leading role in efforts to preserve cultural heritage, we show our respect for other cultures by protecting their traditions. The Committee recommendation includes \$1,000,000 out of available funds to create an Ambassador's Fund for Cultural Preservation. U.S. Ambassadors from underdeveloped countries may submit competitive proposals for one-time or recurring projects with awards based on the importance of the site, the country's need, and the ability to make a meaningful contribution to the preservation of a site, object, or form of expression. The Department is directed to submit a report to the Committees on winning projects on an annual basis.*

[http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=106\\_cong\\_reports&docid=f:sr404.pdf](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=106_cong_reports&docid=f:sr404.pdf)

In the Joint Conference Report 106-1005 (page 291) tied to P.L. 106-553 (formerly H.R. 4942), Congress preserved the intent of the Ambassadors Fund but changed the funding mechanism, directing the State Department to set aside existing Diplomatic & Consular Program (D&CP) funds for the program—

*The conference agreement does not adopt a Senate provision providing \$1,000,000 to establish an Ambassador's Fund for Cultural Preservation. Instead, the Department shall identify up to \$1,000,000 from funds provided under this account for an Ambassador's Fund for Cultural*



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*Preservation as described in the Senate report. United States Ambassadors in less-developed countries may submit competitive proposals for one-time or recurring projects with awards based on the importance of the site, object, or form of expression, the country's need, the impact of the United States contribution to the preservation of the site, object, or form of expression, and the anticipated benefit to the advancement of United States diplomatic goals. The Department is directed to submit an annual report to the House and Senate Committees on Appropriations on the selection process used, and on the expenditure of funds by project.*

[http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=106\\_cong\\_reports&docid=f:hr1005.pdf](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=106_cong_reports&docid=f:hr1005.pdf)

## **Q: What are the statutory authorities for the U.S. Ambassadors Fund for Cultural Preservation?**

A: General grant-making authority for the AFCP is contained in the Mutual Educational and Cultural Exchange Act of 1961 (Fulbright-Hays Act, P.L. 87-256). In those cases where the funding comes from ESF or other non-DCP sources, the grant-making authority under the Foreign Assistance Act of 1961 (P. L. 87-195) applies.

Since 2001, Congress has authorized the AFCP and set its fiscal year budget in the annual Appropriations bills, usually in the attached Senate Reports.

## **Q: Is the U.S. Ambassadors Fund for Cultural Preservation listed in the Catalog of Federal Domestic Assistance?**

A: Yes. The program is listed in the CFDA under number 19.025.

## **Q: What are some examples of the kinds of cultural preservation projects supported?**

A: The AFCP supports projects to preserve cultural heritage in three priority funding areas or categories: Cultural Sites, Cultural Objects and Collections, and Forms of Traditional Cultural Expression. Some examples of the kinds of projects the AFCP supports are:

- preservation of historic buildings and sites having architectural, artistic, historical or other cultural (non-religious) importance
- needs assessment and conservation of museum collections



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- archaeological site preservation
- documentation of vanishing traditional craft techniques
- improved environmental conditions for preventive conservation of archives and manuscripts
- documentation of indigenous languages threatened with extinction

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The AFCP’s three focus areas established by Congress align with the classifications used by professionals worldwide to describe cultural heritage:

AFCP Focus Areas	Tangible Heritage		Intangible Heritage
	<i>Moveable</i>	<i>Immoveable</i>	
Cultural Sites		X	
Cultural Objects & Collections	X		
Forms of Traditional Cultural Expression			X

Within each AFCP focus area the Center has established a number of categories for reporting purposes. Those categories are:

Cultural Sites	
Archaeological Sites	Places above ground, underground, or under water recognized as being of particular architectural, artistic, historical, or other cultural (non-religious) interest that preserve the physical remains of past human activities
Historic Buildings and Sites	Structures and sites made by humans recognized as being of particular architectural, artistic, historical, or other cultural (non-religious) interest that are occupied, used, or intended for supporting or sheltering a function
Cultural Objects & Collections	
Archaeological Collections	Groups of objects made or shaped by humans that have been scientifically removed from an archaeological site, can be seen or studied, and are typically kept together



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Ethnographic Objects	Traditional utilitarian, ceremonial, devotional, or other objects important to the cultural heritage of a people because of their distinctive characteristics, comparative rarity, or their contribution to the knowledge of the origins, development, or history of that people
General Museum Conservation	An array of activities intended to preserve and protect objects and collections in a museum setting, such as conservation needs assessments, improvements to environmental and storage conditions, and collections safety and security improvements, etc.
Manuscripts	Books, compositions, or other documents that are written by hand (not mechanically reproduced)
Paintings & Sculpture	Artistic compositions made by applying paints to a two-dimensional surface (paintings, including murals and frescoes) or by carving wood, molding plaster, casting metals, etc., in relief or in the round (sculptures)
Photographic & Film Collections ( <i>discontinued as of October 2011</i> )	<i>Groups of images recorded by a camera onto an emulsion and reproduced as positive prints or paper or kept as negatives or transparencies</i>
<b>Forms of Traditional Cultural Expression</b>	
Crafts	Activities involving the skilled use of one’s hands to produce carpets, boats, mats, furniture, clothing, jewelry, household items, tools, hardware, and utilitarian and other objects traditionally associated with a culture
Dance	A series of motions and steps traditionally associated with a culture and usually performed to music
Drama	Prose or verse compositions traditionally associated with a culture that tell stories and are intended for representation by actors impersonating characters and performing the dialogue and action
Languages	Systems traditionally associated with a culture that combine voice sounds, gestures, or written symbols to communicate thoughts and feelings
Music	Vocal or instrumental expressions traditionally associated with a culture that consist of tones



	organized melodically, harmonically, and rhythmically
Ceremonies	Ceremonial acts traditionally associated with and practiced by a culture, usually on important days of the year or on special occasions in the lives of individuals or communities, such as marriages and harvests
Traditional Knowledge	Scientific, engineering, architectural, medicinal, culinary, and other practical experience traditionally associated with a culture, often accumulated through trial and error over time and passed down from one generation to the next

**Questions about Who Can Request Support**

**Q: Who can request AFCP support?**

A: U.S. ambassadors in eligible countries, in partnership with qualified entities, may request support through the Ambassadors Fund. “Qualified entities” are reputable and accountable non-governmental organizations, museums, ministries of culture, or similar institutions and organizations that are able to demonstrate that they have the requisite experience and capacity to manage projects to preserve cultural heritage in collaboration with the national cultural authority in the host country.

**Q: What U.S. embassies are eligible to participate in this program?**

A: The AFCP program uses the United Nations Human Development Index (HDI) as a guide in determining U.S. embassy eligibility. The HDI is an international index composed from per-capita GDP and other statistical data collected by the U.N. Development Programme. Generally speaking, embassies in countries with an HDI rank below 50 are eligible to participate.

**Q: Can individuals or commercial entities receive AFCP support?**

A: Only non-governmental organizations, museums, ministries of culture, or similar institutions are eligible to receive AFCP support.

**Q: Can U.S.-based NGOs, museums, and similar institutions participate in the AFCP program? Can they receive AFCP support?**



A: Unlike many of the exchange programs in the U.S. Department of State, the Bureau neither actively recruits nor requires U.S. participation in AFCP-supported projects overseas. However, AFCP grant recipients may enter into contracts with U.S. citizens and U.S.-based companies and organizations for goods and services required for the successful completion of their projects—especially when they require expertise or supplies and equipment unavailable in their own country or region—but the recipients are also free to hire local consultants or consultants from other countries.

U.S.-based NGOs, museums, universities, and similar institutions may receive AFCP support for projects to preserve cultural heritage overseas. However, the AFCP does not support independent U.S. projects abroad, and U.S.-based entities must demonstrate that they are working in full partnership with the national cultural authority in the host country.

### **Questions about the AFCP Process**

#### **Q: How does the AFCP process work?**

A: Each year, the Bureau of Educational and Cultural Affairs puts out calls for proposals to U.S. embassies in eligible developing countries. U.S. embassies identify potential partners (called “qualified entities”) and projects for which they would like to request funding through the AFCP program. The embassies submit their requests to the Cultural Heritage Center in the Bureau.

The call for proposals for the Annual Competition goes out during the first full week of October of each year. The call for proposals for the Large Grants Program goes out in early December.

#### **Q: What are the deadlines for submitting applications for support?**

Annual Competition	December 31
Large Grants Program	January 15 (abstracts); February 28 (full proposal)

#### **Q: How many proposals can an embassy submit?**

A: There is no limit to the number of proposals a U.S. embassy can submit. However, U.S. embassies are to use discretion when reviewing proposals and request funding only for those which are complete, meet AFCP program priorities, and support MSP or other diplomatic goals.



Furthermore, U.S. embassies are to take into account their capacity to manage multiple AFCP projects and their partner's capacity to complete the project successfully.

### **Questions about the Review and Selection Process**

#### **Q: How does the proposal review and selection process work?**

A: The Center screens all proposals for eligibility based on the neutral criteria contained in the request for proposals. Those criteria include the funding categories, such as cultural sites, established by Congress, and priority activities, such as the preservation of archaeological sites, that are in keeping with international standards for the preservation of cultural heritage such as the Venice Charter. The Center also screens proposals against a list of AFCP program-specific ineligible activities, such as new construction.

Using a point-based system, the Center rates all proposals based on the quality, soundness, comprehensiveness of the project description, plan, and budget; the urgency of the proposed project; the rationale for U.S. support for the project supplied by the requesting U.S. embassy; and the quality and quantity of supporting materials, such as resumes of the key project participants, images of the resource; and notices of official permission from the responsible cultural steward, such as a ministry of culture.

Once the Center has completed its screening and rating, it forwards all eligible proposals to the Public Diplomacy sections in the respective regional bureaus in the State Department for ranking. Once the proposals are ranked, the Center convenes a panel that reviews the ranked proposals and determines how many proposals may receive funding depending on the amount available in the fiscal year.

#### **Q: How many awards can an embassy get in a single year?**

A: There are no limits to the number of AFCP awards a U.S. embassy may get in a single year. The most AFCP awards any one U.S. embassy has received in a single year is three.

### **Questions about Money and Funding**

#### **Q: How is the Ambassadors Fund funded? Where does the money come from?**



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A: The Ambassadors Fund is funded using existing Diplomatic & Consular Program (DCP; .2 [point two]) funds. It does not receive a line item appropriation.

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Each year, Congress recommends that the State Department set aside a specific amount of DCP funds for the U.S. Ambassadors Fund for Cultural Preservation (AFCP). Diplomatic and Consular Programs is the operating account of the Department of State. It includes salaries for all its employees; funding for the operations of the Office of the Secretary, the deputy secretaries, and the under secretaries; funding for the operations of the various regional, functional, and administrative bureaus and their programs associated with the conduct of foreign policy; “non-bricks-and-mortar” security including funds for a guard force, armored vehicles, security training, and electronic and other technical security systems; telecommunications; medical care; transportation and travel; and training. (Congressional Research Service, *State, Foreign Operations Appropriations: A Guide to Component Accounts*, March 2009)

## **Q: Can Economic Support Funds (ESF) be used to support cultural heritage preservation activities? If so, what’s the process?**

A: Yes. ESF may be used to support cultural heritage preservation activities. In such cases, Congress directed that projects be selected using the technical expertise of the Cultural Heritage Center, including the technical review and competitive process established by the Center for the AFCP.

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In the Joint Conference Report (111-366) tied to the Consolidated Appropriations Act, 2010 (P.L. 111-117), Congress noted:

*The conferees are aware that the Department of State may use funds made available under the Economic Support Fund (ESF) heading in title III to support additional cultural preservation projects. The conferees intend that all funds made available from this Act for cultural preservation projects be subject to the Committee's regular notification procedures and that the projects should be selected utilizing the technical expertise of the Department's Cultural Heritage Center, including the technical review and competitive process established by the Center.*



**Q: Are there limits to the amount of funding that embassies can request?**

A: The AFCP does not have a limit on the maximum amount of funding an embassy can request, though most embassies submitting proposals to the AFCP Annual Competition request amounts in the \$10,000 to \$100,000 range. The minimum amount an embassy can request is \$10,000.

The AFCP Large Grants Program awards grants in the \$500,000-\$1m range.

**Q: How does the money make its way to the recipient?**

A: Once the Cultural Heritage Center has completed the AFCP rating, review, and project selection process, the Assistant Secretary for Educational and Cultural Affairs recommends that the Deputy Assistant Secretary for State Programs, Operations, and Budget (RM/BP) release the funds for the approved projects to the respective regional bureaus in the Under Secretariat for Political Affairs (Africa, East Asia and the Pacific, Europe and Eurasia, Near East, South and Central Asia, and Western Hemisphere). The regional bureaus, in turn, allot the project funds to the U.S. embassies which execute the grants.

**Q: Is cost sharing required?**

A: Cost sharing is not required, but in-kind contributions and other forms of cost participation are welcome and encouraged.

**Questions about Cultural Sites and Objects Having a Religious Connection**

**Q: Does the AFCP support the preservation of cultural sites having a religious connection?**

A: The AFCP has supported projects to preserve sites having a religious connection, such as churches and mosques. In most cases, the sites are in states of ruin and preserved as such or are no longer serving their original purposes and are preserved as historical monuments. The sites are nominated and selected solely on their architectural, artistic, historical, or cultural (non-religious) merit.



**Q: How does the AFCP support the preservation of cultural sites having a religious connection without violating the Establishment Clause of the U.S. Constitution and the separation of Church and State?**

A: In January 2003, the U.S. Department of State received guidance from the Office of Legal Counsel at the Department of Justice (OLC/DOJ) on the use of federal funds to preserve items of cultural importance which have a religious connection. That guidance, below, is provided to eligible U.S. embassies wishing to submit project proposals to the U.S. Ambassadors Fund for Cultural Preservation (AFCP):

*SPECIAL NOTE REGARDING SITES AND OBJECTS THAT HAVE A RELIGIOUS CONNECTION: The establishment clause of the U.S. Constitution permits the government to include religious objects and sites within an aid program under certain conditions. For example, an item with a religious connection (including a place of worship) may be the subject of a cultural preservation grant if the item derives its primary significance and is nominated solely on the basis of architectural, artistic, historical or other cultural (not religious) criteria. Posts considering preservation projects with a religious connection are encouraged to contact the Cultural Heritage Center at (202) 632-6301 (ECA/P/C) with any questions.*

AFCP program policies which support this guidance include the following:

- AFCP supports the preservation of cultural sites whose significance rests solely on their secular architectural, artistic, historical, or cultural (non-religious) merit. Such sites have included churches and mosques many of which are considered ruins and no longer in active use.
- Embassy partners include non-governmental organizations, museums, ministries of culture, or similar institutions that are able to demonstrate that they are accountable and have the requisite experience and capacity to manage projects to preserve cultural heritage
- AFCP is active in less developed countries, regardless of religion, whose participation is based on their rank in the United Nations Human Development Index, an international index which is composed from per-capita GDP and other statistical data collected by the U.N. Development Programme.



**Q: How does the State Department ensure that AFCP funds are not diverted to religious purposes?**

A: AFCP program policies and administrative mechanisms are in place to safeguard against the diversion of the federal funds to religious purposes separate from the program’s secular objectives of cultural preservation. Those safeguards include prohibitions against funding support for, among other things:

- Preservation or purchase of privately or commercially owned cultural objects, collections, or real property, including those whose transfer from private or commercial to public ownership is envisioned, planned, or in process but not complete at the time of proposal submission;
- Construction of new buildings;
- Commissions of new works of art or architecture for commemorative or economic development purposes;
- Creation of replicas or re-creation of cultural objects or sites that no longer exist;
- Awards to individuals or commercial entities.

These and other funding prohibitions appear in AFCP requests for proposals under the headings “Ineligible Activities” or “Restrictions,” and they are used in the pre-review screening process to determine technical eligibility.

Other administrative safeguards include mandatory biannual reporting of project activities and spending on the part of the recipient; mandatory prior approval by the grants officer and the AFCP program office for all post-award changes in project activities, project scope, project budget, and project personnel in compliance with the Agency Rule (both uniform administrative requirements and cost principles); and site visits by State Department officials during the project.

AFCP policies on eligibility and funding are consistent with other policies, legal opinions, and case law regarding the use of federal funds for the preservation of cultural sites having a religious connection, including those of other agencies whose programs may award grants for the preservation of religious properties in the United States and U.S. Territories under certain conditions.

**Questions about Program Reporting**



**Q: Does the ECA Cultural Heritage Center report with any regularity on AFCP projects and activities?**

Y: ECA reports AFCP FY activities on an annual basis to Congress. It also drafts the Congressionally-mandated Religious Sites Determination and Report for S that notes for the record that any AFCP projects at sites having a religious connection funded in a single fiscal year involve historically, artistically, or culturally significant sites, are secular in purpose, and are in the national interest of the United States.

**Q: Does AFCP use any standardized lists of criteria for indicating significance, secular purpose, and national interest?**

A: Yes. The determination criteria included in the Religious Sites Report are:

*Significance*

- Artistic, historical, or other cultural (non-religious) importance
- Representative of the achievements of a people, community, or civilization
- Of outstanding value for the study of an historic period
- Associated with events representing broad patterns of world history/culture
- Designated national monument, landmark, or equivalent
- World Heritage site

*SP (Secular Purpose)*

- Preserved as ancient ruin or historic monument
- Converted to secular use (as museum, etc.)
- Technical documentation or assessment work separate from use
- Remedial preservation work separate from use (masonry, roof repairs, etc.)

*National Interest*

- Counters or mitigates extremist ideologies
- Strengthens democratic institutions and civil society
- Engages women, youth, or under-served communities
- Supports post-conflict or post-disaster recovery efforts
- Supports U.S. treaty or other bilateral agreement obligations
- Promotes economic growth and development, creates jobs, or builds capacity
- Promotes tolerance and respect for cultural diversity
- Promotes mutual understanding and good will toward the U.S.
- Highlights U.S. contributions or commitments in country



ECA also uses the National Interest criteria in its annual Report to Congress on AFCP projects.

**Q: Which specific U.S. treaties or other bilateral agreement obligations does AFCP support?**

As of this FAQ, AFCP projects may support the following treaties and bilateral agreements (all bilateral agreements concerning the looting and illicit trafficking of cultural property implemented pursuant to the Convention on Cultural Property Implementation Act are noted as “Cultural Property MOU”):

- Belize: Cultural Property MOU
- Bolivia: Cultural Property MOU
- Bosnia & Herzegovina: Annex 8 of the Dayton Accords
- Bulgaria: Cultural Property MOU
- Cambodia: Cultural Property MOU
- China: Cultural Property MOU
- Colombia: Cultural Property MOU
- El Salvador: Cultural Property MOU
- Georgia: United States-Georgia Charter on Strategic Partnership, Section V.3
- Guatemala: Cultural Property MOU
- Honduras: Cultural Property MOU
- Iraq: Strategic Framework Agreement for a Relationship of Friendship and Cooperation between the United States of America and the Republic of Iraq, Section IV.6
- Libya: Framework on Cultural Cooperation between the USA and Libya
- Mali: Cultural Property MOU
- Nicaragua: Cultural Property MOU
- Peru: Cultural Property MOU

**Questions about Private and Commercial Personal and Real Property**

**Q: Does the AFCP support projects that focus on commercially or privately owned cultural objects or sites?**

A: No. The AFCP does not support the preservation of commercially or privately owned cultural heritage.



**Q: What about objects or sites owned by a private trust?**

A: Cultural sites and objects owned by a private trust are considered private property and are thus not eligible for support through the AFCP program.

**Q: What if the objects or sites are owned by a family or a private or commercial entity but are made available to the public?**

A: Even though many cultures have long traditions of family ownership of cultural heritage, that heritage is still privately owned and thus not eligible to receive support from the AFCP program. This prohibition applies even to privately owned heritage that is accessible or made available to the public.

**Q. What if privately owned objects or sites will be transferred to public ownership upon the award of an AFCP grant?**

A: AFCP does not support the preservation of cultural heritage that is privately owned, even if a commitment is pending to donate objects or sites. Transfers of property must take place prior to the submission of AFCP requests for funding to preserve that property.

**Q: What about ethnographic objects like masks, carvings, and textiles, some of which are in museums but important examples of which are in private hands?**

A: Even when the owners of objects are willing to participate and share their resources, the AFCP does not support work on those objects. In such cases, embassies must focus their proposals only on those objects whose ownership status is neither private nor commercial. This restriction applies to inventory of objects as well as to their treatment.

**Questions about Natural Heritage and Human and Animal Remains**

**Q: Does the AFCP support the preservation of natural heritage?**

A: No. The AFCP does not support the preservation of natural heritage. For the purposes of the AFCP program, *natural* heritage includes environmental or geological formations, endangered or protected plants or animals, paleontological collections of fossilized hominid (including



human), plant, and animal remains (including dinosaur bones), and similar natural objects and phenomena.

*Cultural* heritage, on the other hand, refers to the products of past or present human activities, such as buildings, spaces, manmade objects, artifacts, and forms of expression. AFCP supports only the preservation of cultural heritage.

### **Questions about Newspapers and Other News Media**

**Q: Does the AFCP support projects to preserve news media or news reels?**

A: No. The AFCP does not support projects to preserve newspapers, magazines, news radio and television recordings, or other news media. The AFCP recognizes that news media are very important sources of historical information and highly susceptible to deterioration if not properly handled and stored, but the information they transmit often extends beyond the limits of what AFCP can support (namely, the preservation of cultural sites, cultural objects and collections, and forms of traditional cultural expression such as traditional music and dance), and their value stems from the information they transmit, not from their materials (paper, film) or their methods of construction (made by hand, etc.).

### **Questions about Digitization**

**Q: Does the AFCP support projects to scan or otherwise digitize cultural heritage?**

A: No. The AFCP supports such activities only in cases where such activities are part of a larger, clearly defined physical conservation effort.

Although digitization offers an extremely effective means of expanding access to cultural information, it is not a sustainable preservation activity in its own right. Video tapes, diskettes, CDs, DVDs, and other digital storage media are susceptible to damage from extremes and fluctuations in temperature, exposure to the elements, chemical leaks, magnetic disturbance, and improper handling and use. They deteriorate at unpredictable rates but seldom show any outward signs of deterioration. Physical damage to these media is irreversible.

These media, furthermore, depend on a reliable electrical supply and fully operable machinery and equipment for maximum use and effectiveness.



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The AFCP gives priority to proposals that directly address the physical preservation and protection needs of cultural objects and sites or that contribute to the preservation of tangible or intangible heritage in sustainable ways. The AFCP program will consider proposals that involve digitization only if that activity is part of a larger, comprehensive effort to ensure the physical preservation and protection of cultural heritage.