Secretary of the Interior's Standards for Rehabilitation - Stakeholder Survey

In response to the ongoing national discussion of the efficacy of the Secretary of the Interior's Standards for Rehabilitation in their present form and application, the National Conference of State Historic Preservation Officers (NCSHPO) established a working group in March 2023 to carefully examine issues and perspectives related to the Standards for Rehabilitation and their application, and ultimately to create a summary report that identifies issues, recommendations, and case studies to be broadly shared.

The Stakeholder Subcommittee is focused on obtaining input from multiple perspectives outside of SHPOs, NPS, and related entities. The Subcommittee is seeking opportunities for thoughtful engagement and input from a wide variety of preservationists, professionals, and other stakeholders who use the *Standards*, to incorporate a broad range of experiences and perspectives.

As a first step in support of that goal, the Subcommittee has created this stakeholder survey which poses questions about how each individual interacts with and perceives the Standards for Rehabilitation and their application. Please feel free to share this survey with others who use the Standards for Rehabilitation. We are requesting submission of responses to the survey by **December 15, 2023**.

Please note that for the purposes of this survey, we are requesting feedback only on the Secretary of the Interior's Standards for Rehabilitation (https://www.nps.gov/articles/000/treatment-standards-rehabilitation.htm), not the Standards for Preservation, Restoration, or Reconstruction. This survey also does not address the National Register of Historic Places or recognition of historic properties, which was the subject of a report issued by NCSHPO earlier this year (https://ncshpo.org/issues/nhdac/).

Thank you so much for your time and assistance!

National Conference of State Historic Preservation Officers

Stakeholder Subcommittee of the NCSHPO Secretary of the Interior's Standards for Rehabilitation Working Group

Questions or comments? Please contact Anne Raines, Deputy Director / DSHPO, Maryland Historical Trust, Stakeholder Subcommittee Chair, at anne.raines@maryland.gov.

* Indicates required question	
Email *	
Your email	
1. What is your name? *	
Your answer	
2. NCSHPO has issued this survey broadly to preservation and cultural resource * professionals via a range of professional organizations and lists. How (from which organization/list, if applicable) did you receive this survey?	r
Your answer	

3. Which of the options below best describes the role(s) in which you are involved * in historic preservation?							
You may select multiple options if desired. If you select "Other", please describe.							
Federal government							
State government							
Local government							
Architecture / engineering firm							
Cultural Resource Management firm							
Other private business							
Nonprofit							
Professional organization							
Educational institution							
Student							
☐ Elected official							
Developer							
Homeowner / property owner							
Advocate							
Interested public							
Other:							

4. What is your current profession?	*
You may select multiple options if desired. If you select "Other", please describe).
Architect	
Engineer	
Architectural historian	
Archaeologist	
Anthropologist	
Historian	
Planner	
Professor / educator	
Student	
☐ Elected official	
Government employee	
Nonprofit organization employee	
Developer	
Consultant	
Contractor / tradesperson	
Other:	

5. What is your educational background? *	
You may select multiple options if desired. If you select "Other", please describe.	
Historic preservation	
Architecture / Interior Architecture	
Engineering	
Architectural history	
Archaeology	
Anthropology	
History	
Planning	
Real estate / development / finance	
Construction / construction management	
Preservation trades	
Conservator	
Other:	
6. For how many years have you been involved in historic preservation? *	
O-3 years	
O 4-9 years	
O 10-19 years	
O 20-29 years	
30 or more years	

7. In which state(s) or U.S. territory (territories) are you involved with preservation?	*
Select all that apply. Territories/freely associated states are listed at bottom.	
☐ AL	
☐ AK	
☐ AZ	
AR	
☐ CA	
Со	
СТ	
☐ DE	
☐ DC	
☐ FL	
☐ GA	
□ НІ	
☐ ID	
□ IN	
☐ IA	
☐ KS	
☐ KY	
LA	
☐ ME	
☐ MD	
☐ MA	

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☐ MI			
☐ MN			
☐ MS			
□ мо			
МТ			
☐ NE			
□ NV			
☐ NH			
☐ NJ			
☐ NM			
NY			
☐ NC			
☐ ND			
ОН			
ОК			
OR			
☐ PA			
RI			
☐ SC			
SD			
☐ TN			
□ тх			
UT			
☐ VT			
☐ VA			

☐ WA			
☐ WI			
☐ wv			
☐ WY			
☐ AS			
☐ GU			
□ МР			
☐ PR			
□ VI			
RMI			
☐ PW			
☐ FM			

8. Through which of the following do you have experience with the Standards for Rehabilitation?							
Select all that apply. If you select "Other", please describe.							
Federal rehabilitation tax credits							
State rehabilitation tax credits							
Regulatory review (Section 106 reviews or State-level equivalent)							
Federal preservation grant programs							
State preservation grant programs							
Local preservation review							
Covenants or easements							
I do not interact with or apply the Standards							
Other:							

9. CONSISTENCY WITHIN PROGRAMS: Over time, how consistent have you found * the application of the Standards for Rehabilitation to be for each of the following?

	Very consistent	Somewhat consistent	Neutral	Somewhat inconsistent	Very inconsistent	Do not know / do not interact with this program
Federal rehabilitation tax credits	0	0	0	0	0	0
State rehabilitation tax credits	0	0	0	0	0	0
Regulatory review (Section 106 reviews or State-level equivalent)	0	0	0	0	0	0
Federal preservation grant programs	0	0	0	0	0	0
State preservation grant programs	0	0	0	0	0	0
Local preservation review	0	0	0	0	0	0
Covenants or easements	0	0	0	0	0	0

10. FLEXIBILITY: Currently, how flexible do you find the application of the Standards for Rehabilitation to be for each of the following?

	Very flexible	Somewhat flexible	Neutral	Somewhat inflexible	Very inflexible	Do not know / do not interact with this program
Federal rehabilitation tax credits	0	0	0	0	0	0
State rehabilitation tax credits	0	0	0	0	0	0
Regulatory review (Section 106 reviews or State-level equivalent)	0	0	0	0	0	0
Federal preservation grant programs	0	0	0	0	0	0
State preservation grant programs	0	0	0	0	0	0
Local preservation review	0	0	0	0	0	0
Covenants or easements	0	0	0	0	0	0

11. CHANGE IN INTERPRETATION: Over time, in what way has the interpretation/application of the Standards for Rehabilitation changed for each of the following?

	Become much more flexible	Become somewhat more flexible	Stayed about the same	Become somewhat less flexible	Become much less flexible	Do not know / do not interact with this program
Federal rehabilitation tax credits	0	0	0	0	0	0
State rehabilitation tax credits	0	0	0	0	0	0
Regulatory review (Section 106 reviews or State-level equivalent)	0	0	0	0	0	0
Federal preservation grant programs	0	0	0	0	0	0
State preservation grant programs	0	0	0	0	0	0
Local preservation review	0	0	0	0	0	0
Covenants or easements						

Covenants or easements

12. CONSISTENCY ACROSS PROGRAMS/AGENCIES: Over time, how consistent have you found the application of the Standards for Rehabilitation to be in the following scenarios?

	Very consistent	Somewhat consistent	Neutral	Somewhat inconsistent	Very inconsistent	Do not know / do not interact
Across different programs at NPS	0	0	0	0	0	0
Across different programs at a SHPO	0	0	0	0	0	0
Between NPS and SHPO in tax credit reviews	0	0	0	0	0	0
Between NPS and SHPO in grant project reviews	0	0	0	0	0	0
Between federal agency and SHPO in Section 106 consultation	0	0	0	0	0	0
Between SHPOs in different states						

Between NPS and local government	0	0	0	0	0	0
Between SHPO and local government	0	0	0	0	0	0
Between NPS and other federal agencies	0	0	0	0	0	0
Between SHPO and federal agencies other than NPS	0	0	0	0	0	0
Between SHPO and other state agencies	0	0	0	0	0	0
Between other agencies	0	0	0	0	0	0
Between other agencies	0	0	0	0	0	0

13. How often do you encounter challenges in balancing the following project requirements with the Standards for Rehabilitation? Encountered challenges in the past, but Very often Sometimes Occasionally Never now have a workable approach for addressing Building energy efficiency requirements Water use reduction requirements Seismic requirements Flood protection requirements Fire protection requirements Other hazard mitigation requirements Implementation of alternative energy sources Local zoning requirements Other building code requirements

requirements								
14. Do you believe there is enough guidance on the application or interpretation of * the Standards for Rehabilitation for each of the following groups? Select one response per row.								
	Strongly agree there is enough guidance	Somewhat agree there is enough guidance	Neutral	Somewhat disagree there is enough guidance	Strongly disagree there is enough guidance	Do not know		
For program applicants / users	0	0	0	0	0	0		
For reviewers	0	0	0	0	0	0		
For the general public	0	0	0	0	0	0		

15. What updates to guidance would benefit you and your work? *

	Works well as is - no updates needed	Needs to be wholesale replaced	Needs major updates	Needs minor updates	Heard of this but never used it	Never heard of this and never used it
NPS Guidelines for Rehabilitating Historic Buildings	0	0	0	0	0	0
NPS Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings	0	0	0	0	0	0
NPS Guidelines on Flood Adaptation for Rehabilitating Historic Buildings	0	0	0	0	0	0
NPS Preservation Briefs	0	0	0	0	0	0
NPS Tech Notes	0	0	0	0	0	0
NPS Interpreting the Standards Bulletins	0	0	0	0	0	0

NPS workshops, webinars, or training	0	0	0	0	0	0	
SHPO guidance	0	0	0	0	0	0	
SHPO workshops, webinars, or training	0	0	0	0	0	0	
National Trust for Historic Preservation guidance	0	0	0	0	0	0	
Advisory Council on Historic Preservation (ACHP) guidance	0	0	0	0	0	0	
National Alliance of Preservation Commissions (NAPC) guidance	0	0	0	0	0	0	

16. What guidance do you use most frequently? *
Select up to three.
NPS Guidelines for Rehabilitating Historic Buildings
NPS Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings
NPS Guidelines on Flood Adaptation for Rehabilitating Historic Buildings
NPS Preservation Briefs
NPS Tech Notes
NPS Interpreting the Standards Bulletins
NPS workshops, webinars, or training
SHPO guidance
SHPO workshops, webinars, or training
National Trust for Historic Preservation guidance
Advisory Council on Historic Preservation (ACHP) guidance
National Alliance of Preservation Commissions (NAPC) guidance
Other:
17. What specific topics would you suggest should be updated in existing guidance - OR - what specific guidance documents should be updated (for example, "Preservation Brief #XX") and, briefly, why?
Your answer

18. What NEW guidance should be provided - what topics need to be covered, what type of guidance (webinar, in-person training, written guidance, etc.) and who should develop and issue the guidance?

Your answer

19. How well do you feel the Standards for Rehabilitation can address the following topics?

Check all that apply.

	As written, the Standards are flexible enough to address this	The Standards need minor tweaks to address this	The Standards need major revision to address this	The Standards do not currently address this at all	The Standards should not even attempt to address this	The Standards themselves may be flexible enough, but more / better guidance is needed on application / implementation	S
Climate resilience and adaptation							
Hazard mitigation (flood, fire, seismic, etc.)							
Energy efficiency and sustainability							
Housing affordability							
Equity and social justice outcomes							
Economics							
Public support							

20. On balance, how do you feel the Standards for Rehabilitation are working as a *historic preservation mechanism?
Select only one.
I do not have issues with the Standards or their interpretation.
I do not have issues with the Standards, BUT I take issue with their interpretation.
I have issues with the Standards themselves, AND I take issue with their interpretation.
I do not have strong feelings on this question.

21. In the following list, select all the statements you agree with regarding the * Standards for Rehabilitation.
The Standards are successfully applied to most project and building types.
The Standards could benefit from more consistent application.
The Standards could benefit from more flexible application.
The Standards could benefit from an update.
The Standards contribute to positive preservation outcomes.
Rehabilitation incentives or public funding are sufficient to offset the additional costs to meet the Standards in most cases.
Rehabilitation incentives or public funding are not sufficient to offset the additional costs to meet the Standards in most cases.
The Standards have served the preservation field well for decades.
Any changes to the Standards may have unintended, unforeseen consequences.
The Standards are a dated, top-down approach to preservation.
The Standards are a good approach but should be revised to be more explicitly applicable to issues that were not anticipated when they were written.
The Standards should be reviewed at least every 10 years and revised if warranted.
Reviewers require a reasonable level of detail and specificity to assess compliance with the Standards.
Reviewers require an unreasonable level of detail and specificity to assess compliance with the Standards.
Reviewers focus on the Standards but do not follow the various NPS Guidelines.
None of the above
Other:

22. Would you be interested in continuing this discussion by participating in a forum related to the Standards for Rehabilitation?
O Yes
O No
23. Please add any other information you think may be helpful, or other questions you think we should ask, as we continue the conversation on the Secretary of the Interior's Standards for Rehabilitation.
Your answer
24. May we contact you with follow up questions? *
O Yes
O No
Thank you for your time and consideration!
A copy of your responses will be emailed to the address you provided.
Submit Page 1 of 1 Clear form
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SHPO SOI Standards Survey

In response to ongoing national discussion of the efficacy of the Secretary of the Interior's *Standards for Rehabilitation* in their present form and application, the National Conference of State Historic Preservation Officers (NCSHPO) approved the establishment of a working group in 2023. The purpose of the working group is to carefully examine the *Standards for Rehabilitation*, alongside the perspectives of other stakeholders, to provide the preservation community at-large with a carefully considered and inclusive opinion of the *Standards for Rehabilitation* and their application. The goal of the committee is to complete its work in phases, with a draft report available later in 2024.

As one subcommittee of the working group, the Colleague Engagement committee has taken up the charge of identifying challenges encountered in consistently applying the *Standards for Rehabilitation* across all National Historic Preservation Act programs through engagement activities such as surveys and listening sessions. With the following survey we are specifically asking for responses from the State Historic Preservation Offices (SHPOs) regarding their experiences with the Standards. We would appreciate responses from each State Historic Preservation Officer as well as Deputy SHPOs, but please also distribute this survey to all staff members who apply the Secretary of the Interior's *Standard for Rehabilitation* as part of their duties. Each staff member should complete their own individual submission. Staff members who do not apply the *Standards for Rehabilitation* as part of their duties need not participate.

Questions? Please contact Katrina Ringler, Katrina.Ringler@ks.gov

Thank you so much for your time and effort!

National Conference of State Historic Preservation Officers

Colleague Engagement Subcommittee of the NCSHPO SOI Standards Committee

ncshpo2023@gmail.com Switch account



* Indicates required question

Email *

Your email



1. What is your name? *
Your answer
2. Which state or U.S. territory do you represent? *
(territories/freely associated states at bottom)
Choose
3. How many years have you been working in positions where you apply the Secretary of the Interior's Standards for Rehabilitation?
O-3 years
O 4-9 years
O 10-19 years
O 20-29 years
30 years or more



4. In which of the following programs do you apply the Standards for * Rehabilitation?
Select all that apply. If you select "Other", please describe.
Federal rehabilitation tax credits
State rehabilitation tax credits
Federal regulatory review (Section 106)
State-level regulatory review
Federal preservation grant programs
State preservation grant programs
Overseeing local preservation programs for CLG reviews
Covenants or easements
Other. Use the following box for explanation.
If you selected "Other" for Question 4, please explain here.
Your answer



5. The following are some concerns that have been heard by NCSHPO about the * Standards for Rehabilitation.									
Please rank them based on your experience. Which concerns do you hear/receive most frequently to least frequently?									
Please select one column for each row.									
	1 - Most frequent	2	3	4	5	6 - Least frequent			
The Standards are not flexible	0	0	0	0	0	0			
Different agencies have different interpretations	0	0	0	0	0	0			
Guidance is outdated due to rapidly changing technologies/materials/etc.	0	0	0	0	0	0			
Review slows down projects	0	0	0	0	0	0			
Standards do not take into account economic or technical feasibility	0	0	0	0	0	0			
Standards should not be applied to all properties the same	0	0	0	0	0	0			
Do you have other comments related to Question 5?									
Your answer									



6. In <u>your experience</u> , which of the following are the most difficult to * navigate when applying the <i>Standards for Rehabilitation</i> ?
Select the top three.
Evaluating the condition of deteriorated materials (i.e. is this beyond repair)
Evaluating replacement materials (i.e. windows/siding/ etc.)
Proposed new feature is inconsistent with the building's character
Proposed new material does not sufficiently match the historic material
Rooftop additions that are highly visible (including solar panels)
Major changes to interior circulation patterns
Inappropriate masonry repair proposals
Being consistent across property types
Being consistent amongst various programs (i.e. design review/ tax credits/ grants)
Understanding the proposed rehabilitation plan
Understanding the existing condition of the property
Incompatible new use
Do you have other options to suggest for Question 6?
Your answer



	1 most likely reason	2	3	4	5	6
More training is needed for evaluation						
Submitters struggle with supplying documentation						
Requested documentation means added cost for the project						
Guidance on how to evaluate is insufficient						
Available guidance is inconsistent						
Other. Please use the box below for explanation.						
explanation.						

8. Of the following, which is the <u>biggest</u> issue/challenge with applying the Standards for Rehabilitation?	*
Select one.	
Building energy efficiency requirements	
Water use reduction requirements	
Seisemic requirements	
Flood protection requirements	
Fire protection requirements	
Other hazard mitigation requirements (i.e. lead or asbestos)	
Implementation of alternative energy sources	
Local zoning requirements	
Other building code requirements	
Affordable housing requirements	
Accessibility requirements	
Other project requirements. Use the box below to explain.	
If you said "Other" in question 8, please explain.	
Your answer	



9. How often do you encounter the challenge selected in Question 8 when applying the Standards for Rehabilitation?								
1=Very often 2=Sometime 3=Occasiona 4=Encounter addressing	s Illy	in the past, but	: now have a w	orkable approach fo	or			
	1	2	3	4				
	0	0	0	0				



10. How well do you feel the Standards for Rehabilitation can address the following topics? Use slider at the bottom to view more options. The St As written The The The them Standards The Standards the Standards may be Standards Standards should need need enou do not not even are major minor more flexible revision currently attempt tweaks to guida enough to to address to address neec address address this at all address this applic this this this implem Climate resilience and (adaptation Hazard mitigation (flood/fire/seismic/etc.) Energy efficiency and sustainability

4	>



Housing affordability

outcomes

Equity and social justice

Economic development

Public support for

preservation

11. <u>Within your organization</u> , how consistent have you found the application of the <i>Standards for Rehabilitation</i> to be for each of the following?									
Select one response per row.									
	Very consistent	Somewhat consistent	Neutral	Somewhat inconsistent	Very inconsistent	Do not know / do not interact with this program			
Federal rehabilitation tax credits	0	0	0	0	0	0			
State rehabilitation tax credits	0	0	0	0	0	0			
Federal level regulatory review (i.e. Section 106 reviews)	0	0	0	0	0	0			
State level regulatory reviews	0	0	0	0	0	0			
Federal preservation grant programs	0	0	0	0	0	0			
State preservation grant programs	0	0	0	0	0	0			

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Covenants or easements

Do you have additional comments related to Question 11?
Your answer
12. CONSISTENCY WITHIN YOUR ORGANIZATION: How do you ensure the consistent application of the Standards for Rehabilitation within the various programs your office administers?
Mark all that apply.
Team meetings amongst program staff
Regularly scheduled meetings with all SHPO staff
Special committees composed of staff from various programs
Specific training for those applying the Standards
Nothing specific
We do not try to ensure consistency across programs.
Other. Please use the box below to explain.
If you said "Other" in question 12, please explain or add additional context to your answer.
Your answer



13. TRAINING WITHIN YOUR ORGANIZATION: In your opinion, what is the best way to train reviewers who apply the <i>Standards for Rehabilitation</i> ?					
Rank your top three.					
	1 - highest preference	2	3		
NPS trainings (i.e. webinars or inperson)					
Non-NPS trainings					
Mock review of projects					
Assign written guidance to read					
Shadow an experienced reviewer					
Team meetings					
One-on-one talk through project materials					
Review case studies					
Other. Please use the box below to explain.					



If you said "Other" in question 13, please explain or add additional context to your answer.

Your answer



14. FLEXIBILITY: Currently, how flexible do you find the application of the *Standards for Rehabilitation* to be by the people responsible for decision making in each of the following programs?

Select one response per row.

	Very flexible	Somewhat flexible	Neutral	Somewhat inflexible	Do not know / do not interact with this program
Federal rehabilitation tax credits	0	0	0	0	0
State rehabilitation tax credits	0	0	0	0	0
Federal level regulatory review (i.e. Section 106)	0	0	0	0	0
State level regulatory programs	0	0	0	0	0
Federal preservation grant programs	0	0	0	0	0
State preservation grant programs	0	0	0	0	0
Covenants or easements	0	0	0	0	0



	,	cation of th	e Standard	s for Rehab	ilitation ch	w has the anged in ger	neral?
2 = Some 3 = No cha 4 = Some	what more more flexi	rigid e flexible					
	1	2	3	4	5	6	
	0	0	0	0	0	0	



16. CONSISTENCY ACROSS PROGRAMS/AGENCIES: In <u>your experience over time</u>, how consistent have you found the application of the *Standards for Rehabilitation* to be in the following scenarios?

Select one response per row.

	Very consistent (predictable)	Somewhat consistent	Neutral	Somewhat inconsistent (unpredictable)	Very inconsistent (problematic)	know / Do not interact with this program
Across different programs at NPS	0	0	0	0	0	0
Across different programs at your current SHPO	0	0	0	0	0	0
Between NPS and SHPO in tax credit reviews	0	0	0	0	0	0
Between NPS and SHPO in grant project reviews	0	0	0	0	0	0
Between federal agency and SHPO in Section 106 consultation	0	0	0	0	0	0

Between SHPO and federal agencies outside of Section 106 consultation	0	0	0	0	0	0	
Between SHPOs in different states	0	0	0	0	0	0	
Between NPS and local government	0	0	0	0	0	0	
Between SHPO and local government	0	0	0	0	0	0	
Between NPS and other federal agencies	0	0	0	0	0	0	
Between SHPO and other state agencies	0	0	0	0	0	0	
Amongst other agencies at local or state or national level	0	0	0	0	0	0	

Do you have additional comments related to Question 16?
Your answer
17. Is it your belief that the application of the <i>Standards for Rehabilitation</i> by NPS * has become more stringent?
O Yes
○ No
O No comment



18. Do you believe there is enough guidand the Standards for Rehabilitation for each of				rpretatior	of *
Select one response per row. Use the slider at the bottom to see all colur	nns.				
	There is definitely enough guidance	There is probably enough guidance	Neutral	There is probably not enough guidance	n enc
For program applicants/users (i.e. architects/developers/planners/consultants /property owner)	0	0	0	0	(
For reviewers (i.e. preservation commissioners/CLG staff/SHPO staff)	0	0	0	0	(
For the general public (i.e. one-time applicant/non-professionals/preservation advocates)	0	0	0	0	(
19. Does your office produce any guidance applying the Secretary of the Interior's <i>Star</i> duplicating or pointing toward NPS guidan	ndards for		. •	•	
Yes. Please explain in the box below.					
○ No					



If you answered "yes" to Question 19, please explain what kinds of guidance your SHPO produces and in what format.

Your answer



20. What updates to guidance would benefit you and your work? *

Select o	ne resp	oonse	per	row.
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	Works well as is. No updates needed	Needs to be wholesale replaced	Needs major updates	Needs minor updates	Heard of this but never used it	Never heard of this and never used it
NPS Guidelines for Rehabilitating Historic Buildings	0	0	0	0	0	0
NPS Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings	0	0	0	0	0	0
NPS Guidelines on Flood Adaptation for Rehabilitating Historic Buildings	0	0	0	0	0	0
NPS Preservation Briefs	0	0	0	0	0	0
NPS Tech Notes	0	0	0	0	0	0
NPS Interpreting the Standards Bulletins	0	0	0	0	0	0
NPS workshops or webinars or training	0	0	0	0	0	0



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SHPO guidance	0	0	0	0	0	0	
workshops or webinars or training	0	0	0	0	0	0	
National Trust for Historic Preservation guidance	0	0	0	0	0	0	
Advisory Council on Historic Preservation (ACHP) guidance(SCHOL	0	0	0	0	0	0	
National Alliance of Preservation Commissions (NAPC) guidance (NAPC) guidance	0	0	0	0	0	0	
Other suggestions f	or Questic	on 20?					
Your answer							



21. What guidance do you use most frequently? *
Select up to three of your most frequent.
NPS Guidelines for Rehabilitating Historic Buildings
NPS Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings
NPS Guidelines on Flood Adaptation for Rehabilitating Historic Buildings
NPS Preservation Briefs
NPS Tech Notes
NPS Interpreting the Standards Bulletins
NPS workshops/webinars/or training
SHPO guidance
SHPO workshops/webinars/or training
National Trust for Historic Preservation guidance
Advisory Council on Historic Preservation (ACHP) guidance
National Alliance of Preservation Commissions (NAPC) guidance
Other:



ank your top three pref	erences.		
	1 - highest preference	2	3
lasonry	0	0	0
oofing	0	0	0
ood Windows	0	0	0
uminum Windows	0	0	0
eel Windows	0	0	0
ainting exteriors	0	0	0
orefronts	0	0	0
ncrete	0	0	0
sessing Character- fining Features	0	0	0
dustrial Buildings	0	0	0
ricultural Buildings	0	0	0
aster	0	0	0
/AC Systems	0	0	0
olar Panels	0	0	\circ

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Making properties accessible	0		0	0
Lead paint	0		0	0
Rooftop additions / features	0		0	0
Protecting archeological resources	0		0	0
Functionally related properties	0		0	0
White boxing for completed projects	0		0	0
23. What is your pref	erred format for	r receiving gui	dance about tl	ne Standards for *
Rank according to pr	eference, 1=mos	st preferred, 4=	eleast preferred	d
	1	2	3	4
Webinar	0	0	0	0
In-person training	0	0	0	0
Written guidance	0	0	0	0
Written guidance Recorded videos	0	0	0	0



24. Who should de	24. Who should develop and issue guidance on the <i>Standards for Rehabilitation</i> ? *							
Rank according to preference, 1=most preferred, 5=least preferred								
	1	2	3	4	5			
National Park Service / Technical Preservation Services (TPS)	0	0	0	0	0			
National Park Service / a department other than TPS	0	0	0	0	0			
National Center for Preservation Technology and Training	0	0	0	0	0			
Collaboratively through a newly created entity	0	0	0	0	0			
Other. Please specify below.	0	0	0	0	0			
Other suggestions	Other suggestions for Question 24?							
Your answer								



25. On balance, how do you feel the <i>Standards for Rehabilitation</i> are working as a *historic preservation mechanism?
I do not have issues with the Standards or their interpretation.
I do not have issues with the Standards BUT I take issue with their interpretation.
I have issues with the Standards themselves AND I take issue with their interpretation.
I do not have strong feelings on this question.



26. Select all the statements you agree with regarding the Standards for * Rehabilitation.
The Standards are successfully applied to most project and building types.
The Standards could benefit from more consistent application.
The Standards could benefit from more flexible application.
The Standards could benefit from an update.
The Standards contribute to positive preservation outcomes.
Rehabilitation incentives or public funding are sufficient to offset the additional costs to meet the Standards in most cases.
Rehabilitation incentives or public funding are not sufficient to offset the additional costs to meet the Standards in most cases.
The Standards have served the preservation field well for decades.
Any changes to the Standards may have unintended/unforeseen consequences.
The Standards are a dated top-down approach to preservation.
The Standards are a good approach but should be revised to be more explicitly applicable to issues that were not anticipated when they were written.
The Standards should be reviewed at least every 10 years and revised if warranted.
Reviewers require a reasonable level of detail and specificity to assess compliance with the Standards.
Reviewers require an unreasonable level of detail and specificity to assess compliance with the Standards.
Reviewers focus on the Standards but do not follow the various NPS Guidelines.
None of the above
Other:

Questions relevant especially to SHPO CLG coordinators.

These questions are particularly relevant to SHPO staff serving as state CLG coordinators.





27. Do you serve as the state CLG coordinator or co-coordinator within the State * Historic Preservation Office?
Yes. Please complete Questions 28-31.
No. Please skip to Question 32.
28. Do the majority of local ordinances in your state make reference to the Standards for Rehabilitation?
○ Yes
○ No
Some
O Don't know
29. In your state, do the local review boards have proficiency in applying the Standards for Rehabilitation?
○ Yes
O No
Some
O Don't know



30. Have you seen instances where local approvals conflict with SHPO opinions?
○ Yes
○ No
Some
O Don't know
31. Do your CLGs, especially those without a preservation planner on staff, reach out to SHPO staff when they are unsure how to apply the <i>Standards for Rehabilitation?</i>
O Yes
○ No
O Sometimes
O Don't know
Questions relevant especially to SHPO review & compliance staff These questions are particularly relevant to SHPO staff working within R&C programs.
32. Do you have responsibilities within the Review & Compliance program for your *
State Historic Preservation Office?
Yes. Please complete Questions 33-37.
No. Please skip to Question 38.



33. Does your state have a review process akin to Section 106 and does it use the Standards for Rehabilitation?
O Yes
○ No
We have a program but it does not use Standards for Rehabilitation
O Do not have
34. Does your review & compliance staff apply the <i>Standards for Rehabilitation</i> differently than your tax credit or grant reviewers?
Infrequently
Frequently
Programs do no use the same standards for review
35. If application of the <i>Standards for Rehabilitation</i> by R&C staff is different from tax credit or grant staff, does this cause difficulties between programs?
tax credit or grant staff, does this cause difficulties between programs?
tax credit or grant staff, does this cause difficulties between programs? Yes. Submitters get confused or don't understand why they get different decisions.
tax credit or grant staff, does this cause difficulties between programs? Yes. Submitters get confused or don't understand why they get different decisions. Yes. Reviewers have difficulty explaining their determinations.
tax credit or grant staff, does this cause difficulties between programs? Yes. Submitters get confused or don't understand why they get different decisions. Yes. Reviewers have difficulty explaining their determinations. No difficulties.

36. With which U.S. federal agencies do you most often experience a difference in interpretation of the <i>Standards for Rehabilitation</i> ?
Select top three.
Army Corps of Engineers
Federal Highways
Housing and Urban Development
Dept. of Agriculture
Dept. of Defense / Army
Dept. of Education
Dept. of Energy
Dept. of Health and Human Services
Dept. of the Interior
Bureau of Indian Affairs
Bureau of Land Management
Dept. of Veterans Affairs
Federal Aviation Administration
Federal Communications Commission
Federal Emergency Management Agency
Federal Railroad Administration
Postal Service
Forest Service
None
Other:



37. What is your experience in seeking guidance from the ACHP on how federal * agencies apply the Standards for Rehabilitation and assess effects?							
1=Very unsatisfied 2=Somewhat unsatisf 3=Neutral 4=Somewhat satisfied 5=Very satisfied							
	1	2	3	4	5		
Very unsatisfied	0	0	0	0	0	Very satisfied	
Questions relevant es These questions are pa					ing with t	ax credit programs.	
38. Do you have responding the storic Preservation Yes. Please complete.	Office?			credit pro	ograms fo	or your State *	
No. Please skip to	Question	49.					
39. Do you have a sta Rehabilitation?	te Tax Cr	edit prog	gram and	l does it	use the S	Standards for	
Yes we have a stat	e tax cred	lit and we	e use the	Standard	s for Reha	bilitation	
No we do not have	a state ta	ax credit.	Skip to Q	uestion 4	3.		
O We have a state ta Rehabilitation	x credit p	rogram b	ut it does	not use t	he Standa	ards for	
							0



40. If you answered "yes" in Question 39, is the SHPO responsible for reviewing state tax credit applications according to the <i>Standards for Rehabilitation</i> or another agency/organization tasked with that review?
Yes SHPO reviews for the Standards
No another agency review for the Standards
41. If you answered "yes" in Question 39, are the <i>Standards for Rehabilitation</i> applied in the same manner as for the federal tax credit program?
Yes they are applied as consistently as possible with the federal program
No they are applied differently
If you selected "No, they are applied differently" in Question 41 above, please explain
Your answer
42. How many <u>state</u> tax credit Part 2 (or equivalent) did your office review in federal fiscal year 2023?
Your answer
43. How many <u>federal</u> tax credit Part 2 (or equivalent) did your office review in federal fiscal year 2023?
Your answer

program work?						
Your answer						
45. For federal t			_		edit reviewer ap	ply the
NPS tends t	o be mo	re conservativ	ve than SHPO			
SHP0 tends	s to be m	ore conserva	tive than NPS			
Our reviews	tend to I	oe similar				
46. Overall, how	s admin	_				servation
Rehabilitation a Services Brancl 1=Very unsatisf	s admin h)? fied	istered by th				servation
Rehabilitation a Services Brancl	s admin h)? fied	istered by th				servation
Rehabilitation a Services Branch 1=Very unsatist 2=Somewhat u	s admin h)? fied nsatisfie atisfied	istered by th				servation
Rehabilitation a Services Branch 1=Very unsatisf 2=Somewhat un 3=Neutral 4=Somewhat sa	s admin h)? fied nsatisfie atisfied	istered by th				servation
Rehabilitation a Services Branch 1=Very unsatisf 2=Somewhat un 3=Neutral 4=Somewhat sa	s admin h)? fied nsatisfie atisfied d	istered by th	ne National P	ark Service (Technical Pres	servation



47. When a federal tax credit project denial has been appealed, has SHPO staff been directly involved in discussions during the appeal process?
○ Yes
○ No
We have not had an appeal
48. In general, have you been satisfied with the appeal decisions?
○ Yes
○ No
Somewhat
O Not applicable
Questions relevant especially to SHPO grant review staff These questions are particularly relevant to SHPO staff working with "bricks and mortar" grant programs.
49. Do you have responsibilities within the grant review programs for your State * Historic Preservation Office?
Yes. Please complete Questions 50-52.
No. Please skip to Question 53.



50. How often does your grant reviewer interact with the NPS Grants (STLPG) staff on issues related to the <i>Standards for Rehabilitation</i> ?
Rarely
Regularly
O Quite frequently
51. If you have a state-funded grant program, are the <i>Standards for Rehabilitation</i> applied for that program in the same manner as federally-funded grant programs?
O not have a state-funded grant program.
○ Yes
○ No
Somewhat
52. For federal grant-funded projects, does your NPS grant reviewer apply the <i>Standards for Rehabilitation</i> differently than SHPO staff reviewing those projects?
NPS tends to be more conservative than SHPO.
SHP0 tends to be more conservative then NPS.
Our reviews tend to be similar.
Would you like to add any additional context to your answer for Question 52?

Conclusion

The following few questions conclude this survey and should be applicable to all participants.



53. What would be most helpful with application of the Standards for Rehabilitation by SHPOs? Rank your top four according to most relevant/priority. 1 - most relevant 2 3 4 Additional resources allowing staff to visit more projects Guidance provided in different formats Additional guidance from **NPS** A review matrix Standards applied based on property significance Training for reviewers Training for frequent users and applicants Other. Explain in the box below.



If you replied "other" in Question 53, please explain here.	
Your answer	
54. Would you be interested in continuing this discussion by participating in a forum related to the <i>Standards for Rehabilitation</i> ?	*
○ Yes	
○ No	
55. Please add any other information you think may be helpful, or other question you think we should ask, as we continue the conversation about the Secretary the Interior's Standards for Rehabilitation. Your answer	
56. May we contact you with follow up questions? *	
O Yes	
○ No	
Thank you for your time and consideration!	

A copy of your responses will be emailed to the address you provided.

Submit Page 1 of 1

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