

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

nctshpo2023@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*? *

- 0-3 years
- 4-9 years
- 10-19 years
- 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different agencies have different interpretations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Guidance is outdated due to rapidly changing technologies/materials/etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review slows down projects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Standards do not take into account economic or technical feasibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Standards should not be applied to all properties the same	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have other comments related to Question 5?

Your answer



6. In your experience, which of the following are the most difficult to navigate when applying the *Standards for Rehabilitation*? *

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



7. Related to your response in Question 6, why is this a difficult thing to navigate?

Rank all applicable responses.

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

If you selected "Other" for Question 7, please explain here.

Your answer



8. Of the following, which is the biggest issue/challenge with applying the *Standards for Rehabilitation*? *

Select one.

- Building energy efficiency requirements
- Water use reduction requirements
- Seismic 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=Sometimes

3=Occasionally

4=Encountered challenges in the past, but now have a workable approach for addressing

1

2

3

4



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

Use slider at the bottom to view more options.

	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 may be more helpful if they need more guidance to be implemented
Climate resilience and adaptation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hazard mitigation (flood/fire/seismic/etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency and sustainability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing affordability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equity and social justice outcomes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public support for preservation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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11. Within your organization, how consistent have you found the application of the *Standards for Rehabilitation* 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State rehabilitation tax credits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Federal level regulatory review (i.e. Section 106 reviews)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State level regulatory reviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Federal preservation grant programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State preservation grant programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Covenants or easements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



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 *Standards for Rehabilitation*?

Rank your top three.

	1 - highest preference	2	3
NPS trainings (i.e. webinars or in-person)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-NPS trainings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mock review of projects	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Assign written guidance to read	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shadow an experienced reviewer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Team meetings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
One-on-one talk through project materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Review case studies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other. Please use the box below to explain.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State rehabilitation tax credits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Federal level regulatory review (i.e. Section 106)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State level regulatory programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Federal preservation grant programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
State preservation grant programs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Covenants or easements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Do you have additional comments related to Question 14?

Your answer

15. CHANGE IN INTERPRETATION: Within your organization, how has the interpretation/application of the *Standards for Rehabilitation* changed in general? *

- 1 = Much more rigid
- 2 = Somewhat more rigid
- 3 = No change
- 4 = Somewhat more flexible
- 5 = Much more flexible
- 6 = Not sure

1	2	3	4	5	6
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have additional comments related to Question 15?

Your answer



16. CONSISTENCY ACROSS PROGRAMS/AGENCIES: In your experience over time, 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)	Do not know / Do not interact with this program
Across different programs at NPS	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Across different programs at your current SHPO	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Between NPS and SHPO in tax credit reviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Between NPS and SHPO in grant project reviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Between federal agency and SHPO in Section 106 consultation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Between SHPO and federal agencies outside of Section 106 consultation

Between SHPOs in different states

Between NPS and local government

Between SHPO and local government

Between NPS and other federal agencies

Between SHPO and other state agencies

Amongst other agencies at local or state or national level



Do you have additional comments related to Question 16?

Your answer

17. Is it your belief that the application of the *Standards for Rehabilitation* by NPS * has become more stringent?

- Yes
- No
- No comment



18. 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.

Use the slider at the bottom to see all columns.

	There is definitely enough guidance	There is probably enough guidance	Neutral	There is probably not enough guidance	The definition encourages guidance
For program applicants/users (i.e. architects/developers/planners/consultants /property owner)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For reviewers (i.e. preservation commissioners/CLG staff/SHPO staff)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
For the general public (i.e. one-time applicant/non-professionals/preservation advocates)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



19. Does your office produce any guidance (i.e. written, video, webpage, etc.) about applying the Secretary of the Interior's *Standards for Rehabilitation* which is NOT duplicating or pointing toward NPS guidance?

- 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 one response per row.

	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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NPS Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NPS Guidelines on Flood Adaptation for Rehabilitating Historic Buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NPS Preservation Briefs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NPS Tech Notes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NPS Interpreting the Standards Bulletins	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NPS workshops or webinars or training	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



SHPO guidance

SHPO
workshops or
webinars or
training

National Trust
for Historic
Preservation
guidance

Advisory Council
on Historic
Preservation
(ACHP)
guidance(SCHOL

National Alliance
of Preservation
Commissions
(NAPC) guidance
(NAPC) guidance

Other suggestions for Question 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:



22. What subject should the next priority be for updating or creating guidance?

Rank your top three preferences.

	1 - highest preference	2	3
Masonry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Roofing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wood Windows	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Aluminum Windows	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Steel Windows	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Painting exteriors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Storefronts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Concrete	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assessing Character-Defining Features	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industrial Buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agricultural Buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plaster	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
HVAC Systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Solar Panels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Making properties

accessible

Lead paint

Rooftop additions /
features

Protecting
archeological
resources

Functionally related
properties

White boxing for
completed projects

23. What is your preferred format for receiving guidance about the *Standards for Rehabilitation*? *

Rank according to preference, 1=most preferred, 4=least preferred

1

2

3

4

Webinar

In-person
training

Written guidance

Recorded videos



24. Who should develop and issue **guidance** on the *Standards for Rehabilitation*? *

Rank according to preference, 1=most preferred, 5=least preferred

	1	2	3	4	5
National Park Service / Technical Preservation Services (TPS)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National Park Service / a department other than TPS	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National Center for Preservation Technology and Training	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Collaboratively through a newly created entity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other. Please specify below.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other suggestions for Question 24?

Your answer



25. On balance, how do you feel the *Standards for Rehabilitation* 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
- Don't know

29. In your state, do the local review boards have proficiency in applying the *Standards for Rehabilitation*?

- Yes
- No
- Some
- Don't know



30. Have you seen instances where local approvals conflict with SHPO opinions?

- Yes
- No
- Some
- 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 *Standards for Rehabilitation*?

- Yes
- No
- Sometimes
- 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*?

- Yes
- No
- We have a program but it does not use Standards for Rehabilitation
- Do not have

34. Does your review & compliance staff apply the *Standards for Rehabilitation* differently than your tax credit or grant reviewers?

- Infrequently
- Frequently
- Programs do not use the same standards for review

35. If application of the *Standards for Rehabilitation* by R&C staff is different from 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.
- Other. Please use the box below to explain.

If you answered "other" for Question 35, please explain or add additional context to your answer.

Your answer



36. With which U.S. federal agencies do you most often experience a difference in interpretation of the *Standards for Rehabilitation*?

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 unsatisfied
- 3=Neutral
- 4=Somewhat satisfied
- 5=Very satisfied

Very unsatisfied 1 2 3 4 5 Very satisfied

Questions relevant especially to SHPO tax credit staff

These questions are particularly relevant to SHPO staff working with tax credit programs.

38. Do you have responsibilities within the tax credit programs for your State Historic Preservation Office? *

- Yes. Please complete Questions 39-48.
- No. Please skip to Question 49.

39. Do you have a state Tax Credit program and does it use the *Standards for Rehabilitation*?

- Yes we have a state tax credit and we use the Standards for Rehabilitation
- No we do not have a state tax credit. Skip to Question 43.
- We have a state tax credit program but it does not use the Standards for Rehabilitation



40. If you answered "yes" in Question 39, is the SHPO responsible for reviewing state tax credit applications according to the *Standards for Rehabilitation* 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 *Standards for Rehabilitation* 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 state tax credit Part 2 (or equivalent) did your office review in federal fiscal year 2023?

Your answer

43. How many federal tax credit Part 2 (or equivalent) did your office review in federal fiscal year 2023?

Your answer



44. How many full-time staff are dedicated to state and/or federal tax credit program work?

Your answer

45. For federal tax credit applications, does your NPS tax credit reviewer apply the *Standards for Rehabilitation* differently than SHPO staff?

- NPS tends to be more conservative than SHPO
- SHPO tends to be more conservative than NPS
- Our reviews tend to be similar

Would you like to add any additional context to your answer for Question 45?

Your answer

46. Overall, how satisfied are you with the application of the *Standards for Rehabilitation* as administered by the National Park Service (Technical Preservation Services Branch)?

- 1=Very unsatisfied
- 2=Somewhat unsatisfied
- 3=Neutral
- 4=Somewhat satisfied
- 5=Very satisfied

1	2	3	4	5
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



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
- 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 *Standards for Rehabilitation*?

- Rarely
- Regularly
- Quite frequently

51. If you have a state-funded grant program, are the *Standards for Rehabilitation* applied for that program in the same manner as federally-funded grant programs?

- Do not have a state-funded grant program.
- Yes
- No
- Somewhat

52. For federal grant-funded projects, does your NPS grant reviewer apply the *Standards for Rehabilitation* differently than SHPO staff reviewing those projects?

- NPS tends to be more conservative than SHPO.
- SHPO tends to be more conservative than NPS.
- Our reviews tend to be similar.

Would you like to add any additional context to your answer for Question 52?

Your answer



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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Guidance provided in different formats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Additional guidance from NPS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A review matrix	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Standards applied based on property significance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training for reviewers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training for frequent users and applicants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other. Explain in the box below.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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 *Standards for Rehabilitation*? *

Yes

No

55. Please add any other information you think may be helpful, or other questions you think we should ask, as we continue the conversation about the Secretary of the Interior's *Standards for Rehabilitation*.

Your answer

56. May we contact you with follow up questions? *

Yes

No

Thank you for your time and consideration!

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

Submit

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