

# CLG SOI Standards Survey

In response to ongoing national discussion of the efficacy of the Secretary of the Interior's *Standards for Rehabilitation* (Standards) 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 and their application. The goal of the committee is to complete its work in phases, with a draft report available in the summer of 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 Certified Local Governments (CLGs) regarding their experiences with the *Standards for Rehabilitation*. **Please share this survey with any staff that comprise the local government's preservation office and members of your local preservation commission. We appreciate all responses.**

**Survey Deadline: April 24, 2024**

Questions? Please contact *Katrina Ringler*, [Katrina.Ringler@ks.gov](mailto: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

*For purposes of this survey, the following acronyms are defined:*

*SHPO = State Historic Preservation Office*

*NPS = National Park Service*

[ncshpo2023@gmail.com](mailto:ncshpo2023@gmail.com) [Switch account](#)



\* Indicates required question



Email \*

Your email

1. What is your name? \*

Your answer

2. In which state or U.S. territory is your CLG located? \*

*(territories/freely associated states at bottom)*

Choose

3. What role do you serve within the Certified Local Government (CLG)? \*

- Local government staff
- Historic Preservation Commission member
- Other:



4. Through which of the following programs does your CLG staff or commissioners apply the *Standards for Rehabilitation*? Select all that apply. \*

*If you select "Other", please describe.*

- Federal rehabilitation tax credits
- State rehabilitation tax credits
- Federal level regulatory review (i.e. Section 106)
- State level regulatory review
- Local regulatory review (i.e. Certificate of Appropriateness)
- Federal preservation grant programs
- State preservation grant programs
- Local funding programs (i.e. local grants)
- Covenants or easements
- Other:



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

Select the top three.

- Evaluating 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
- Other:

Do you have additional comments related to question #5?

Your answer



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

- 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
- Affordable housing requirements
- Other project requirements

Do you have additional comments related to question #6?

Your answer



7. How often do you encounter the challenge selected in Question 6 with 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

5=Have never encountered this challenge

1

2

3

4

5



8. 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 themselves may be flexible enough, but more or better guidance is needed on application or implementation |
|--|--|---|---|--|---|---|
| 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"/>   |



Public support for preservation

9. Overall, how satisfied are you with the application of the *Standards for Rehabilitation* as administered by the National Park Service? \*

- 1= I don't know or have no direct experience
- 2= Very unsatisfied
- 3= Somewhat unsatisfied
- 4= Neutral
- 5= Somewhat satisfied
- 6= Very satisfied

1            2            3            4            5            6

                            





10. CONSISTENCY WITHIN PROGRAMS: 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"/>                           |
| Local regulatory reviews (i.e. Certificate of Appropriateness) | <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"/>                           |
| Local funding  |                       |                       |                       |                       |                       |   |



programs (i.e.  
local grant)

Covenants or  
easements

easements

Do you have additional comments related to question #10?

Your answer

11. CONSISTENCY WITHIN YOUR ORGANIZATION: How do you ensure the consistent application of the *Standards for Rehabilitation* within the various programs your organization administers? \*

*Mark all that apply.*

- Team meetings
- Regularly scheduled staff meetings
- Special committee
- Specific training
- Nothing special



12. 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? \*

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 reviews                                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>                           |
| Local regulatory review (i.e. Certificate of Appropriateness) | <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"/>                           |
| Local funding programs (i.e. local grant)                     | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>                           |



Covenants or easements

Covenants or easements

Do you have additional comments related to question #12?

Your answer

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

- 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

                                      

Do you have additional comments related to question #13?

Your answer



14. 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<br>(predictable) | Somewhat consistent   | Neutral               | Somewhat inconsistent<br>(unpredictable) | Very inconsistent<br>(problematic) | Do not know /<br>Do not interact<br>with this<br>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; state or national level



Do you have additional comments related to question #14?

Your answer

15. What are some common complaints heard by your organization regarding the *Standards for Rehabilitation*?

*Select all that apply.*

- The Standards for Rehabilitation are not flexible
- Different agencies have different interpretations
- Guidance is outdated due to rapidly changing technologies or materials; etc.
- Review slows down projects
- Standards for Rehabilitation do not take into account economic or technical feasibility
- Standards for Rehabilitation should not be applied to all properties the same (i.e. locally designated; National Register; and National Historic Landmark)

Do you have additional comments related to question #15?

Your answer



16. Have you received comments from stakeholders (i.e. applicants, developers, consultants) who feel that the application of the *Standards for Rehabilitation* by NPS and SHPOs has become more stringent? \*

- Yes
- No
- Maybe / Not sure

17. Have you seen instances where local approvals conflict with decisions issued by the SHPO or NPS? \*

- Yes - conflict with SHPO decision
- Yes - conflict with NPS decision
- Yes - conflict with SHPO and NPS
- No conflict with either
- No experience with this situation

18. In your responsibilities applying the *Standards for Rehabilitation*, have you experienced more stringent interpretation/explanation by NPS and SHPOs? \*

- Yes
- No
- Maybe
- No experience with this





19. 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 (i.e. architects; developers; planners; consultants; property owner) | <input type="radio"/>                   | <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"/>                      | <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"/>                      | <input type="radio"/> |

Do you have additional comments related to question #19?

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 /  
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

Do you have additional comments related to 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 should the priority be for updating or creating new guidance? \*

*Select up to three of your top preferences.*

- Masonry
- Roofing
- Wood Windows
- Aluminum Windows
- Steel Windows
- Painting exteriors
- Storefronts
- Concrete
- Assessing Character-Defining Features
- Industrial Buildings
- Agricultural Buildings
- Plaster
- HVAC systems
- Solar panels
- Making properties accessible
- Lead paint
- Rooftop additions/features
- Protecting archeological resources
- Functionally related properties
- White boxing for completed projects
- Other:



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 = Most preferred    | 2                     | 3                     | 4 = Least preferred   |
|--------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Webinar            | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| In-person training | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Written guidance   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Recorded videos    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |



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

Rank according to preference: 1=most preferred; 6=least preferred

|   | 1                     | 2                     | 3                     | 4                     | 5                     | 6                     |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| National Park Service - Technical Preservation Services     | <input type="radio"/> | <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"/> | <input type="radio"/> |
| Advisory Council on Historic Preservation                   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| National Conference of State Historic Preservation Officers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| National Alliance of Preservation Commissions               | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Newly created entity  | <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 #24?

Your answer

25. Does your local government employ anyone meeting the Secretary of the Interior's *Professional Qualifications Standards*? \*

[\[https://www.nps.gov/articles/sec-standards-prof-quals.htm\]](https://www.nps.gov/articles/sec-standards-prof-quals.htm)

- Yes - city staff
- Yes - a hired consultant
- No

26. In your community, does the local historic preservation commission have proficiency (competence, skill, expertise) in applying the *Standards for Rehabilitation*? \*

- Yes
- No
- Somewhat
- Local preservation commission does not conduct reviews





27. How often does your local preservation commission attend/receive training on the *Standards for Rehabilitation*? \*

- Yearly
- Monthly
- Bi-annual
- Only upon request

28. In what ways is your local preservation commission receiving training on the *Standards for Rehabilitation*? \*

*Check all that apply.*

- Webinars or CAMP training by National Alliance of Preservation Commissions (NAPC)
- Webinars presented by the National Park Service
- Training provided by State Historic Preservation Office (SHPO) staff
- Other online training (i.e. YouTube videos)
- Written training materials

Other training formats or providers related to question #28?

Your answer



29. Do the people in your organization who have authority/responsibility to apply the *Standards for Rehabilitation* have an adequate level of training or the right tools to understand and apply them? \*

- Yes
- No
- Somewhat

30. 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.



31. 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 or unforeseen consequences.
- The Standards are a dated and 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:



Do you have additional comments related to question #31?

Your answer

32. Would you be interested in continuing this discussion by participating in a forum related to the *Standards for Rehabilitation*? \*

Yes

No

33. 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

34. 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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