

# National Performance Review

of the

**HISTORIC  
PRESERVATION  
FUND  
PARTNERSHIPS**

▶ **Historic Preservation Performance Review Committee**  
▶ **National Park System Advisory Board**  
▶ **Washington, DC ■ March 6, 1994**

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## CHAIRMAN'S LETTER

Dear Mr. Director:

It is with great pleasure that I transmit to you the report of the Historic Preservation Performance Review Committee. On behalf of the entire Committee, thank you for the opportunity to offer our recommendations for significant improvement of the nation's historic preservation partnership.

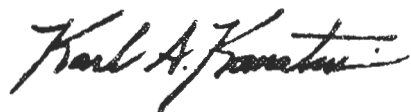
The Committee's work has been guided by several important themes. We affirm the importance of maintaining a recognizable national program marked by high quality and measured by adherence to broad national standards and guidelines. Historic preservation is not just a Federal government concern—it is carried out by all levels of government, the private sector, and individuals. It is most successful when it is led at the national level. We urge the National Park Service to provide that national leadership, to maintain national standards and guidelines for the practice of preservation, and to build the overall preservation constituency through technical assistance, training, and public education.

Today, the national program has attained a level of maturity and competence that delivers nationally consistent service without need for the prescriptive Federal guidance and oversight that were more appropriate in the early years of the program. As the National Park Service staff is freed from responsibility for daily oversight of State activities, we urge you to allow for reassignment of staff time within the historic preservation program to address crying needs that remain unmet in our current operation.

Our specific recommendations are aimed at your charge that we work toward simplicity, improved customer service, and increased reliance on States for daily decision-making. Further, our recommendations are ultimately intended to improve the preservation of the nation's significant cultural resources.

Along with expressing my appreciation for the hard work and unfailing goodwill of my fellow Committee members, I commend to you the excellent work of the National Park Service staff who were assigned to support the Committee in this effort. In particular, I offer special gratitude to Antoinette J. Lee for her skillful handling of staff work for the Committee and to H. Bryan Mitchell for his thoughtful editing of the final report.

Sincerely,



Karl A. Komatsu, AIA  
Chairman

# DIRECTIVE



United States Department of the Interior

NATIONAL PARK SERVICE  
P.O. Box 37127  
Washington, D.C. 20013 7127



SEP 22 1993

## DIRECTIVE

To: Associate Director, Cultural Resources  
From: Director *[Signature]*  
Subject: Improving Service and Reducing Burden in the Historic Preservation Partnership

You and I have agreed that for the Federal, State, local, and private sector partnership in historic preservation to be fully effective, we need to be sure that our own technical assistance, grant-making, and administrative procedures are as efficient and simple as the law and responsible management allow.

Upon your advice, I hereby appoint a special Working Group under your direction, consisting of State and local historic preservation officials and knowledgeable individuals and a like number of others selected by you. By February 28, the Working Group is to recommend ways of significantly improving customer service and reducing the volume, complexity, and whatever may be time-consuming or redundant in NPS-49 or in State or local procedures. In order to do this, the Working Group is to identify the customers of the various levels of the partnership (eg. SHPOs and CLGs may be customers of the NPS, private organizations and individuals, and Federal agencies seeking to comply with Sec. 106 may be customers of SHPOs and CLGs). I expect recommendations in at least four categories: (1) actions that may be taken within my authority, (2) actions that require decisions by the Department or the Office of Management and Budget, (3) actions that require changes in Federal law, and (4) actions that require State or local decisions or changes in law.

**Goal:** To the greatest extent possible, we should focus NPS Historic Preservation Program management on (1) certification of State programs based on their demonstrated ability to meet the requirements of the National Historic Preservation Act, and (2) periodic review of State programs to insure consistency with broad standards and guidelines established by the NPS. This orientation should:

a) provide maximum discretion to the States to manage the program on a daily basis within broad national standards and guidelines;

- b) provide sufficient flexibility in NPS and State oversight of the program to allow for innovation and rapid response to problems when they arise;
- c) take every opportunity to eliminate NPS review of individual decisions made by States (other than those pertaining to properties of national significance) within broad national standards and guidelines and establish instead a system of NPS review of appeals from State decisions;
- d) minimize the paperwork and general administrative burden on States, CLGs, the NPS, and their customers;
- e) foster maximum reliance on States and CLGs to assist the Secretary and NPS in carrying out their responsibilities;
- f) foster speed, quality, and convenience in service to program customers.

The following individuals are hereby appointed:

- 1) Nina Archabal, Director, Minnesota Historical Society,
- 2) Ray Luce, Ohio State Historic Preservation Officer,
- 3) Bryan Mitchell, President, National Conference of State Historic Preservation Officers,
- 4) Cathryn Buford Slater, Arkansas State Historic Preservation Officer,
- 5) Julia Stokes, New York Deputy State Historic Preservation Officer,
- 6) More Winter, President, National Alliance of Preservation Commissions.
- 7) Destry Jarvis, Assistant to Director, National Park Service.

Please prepare a letter for my signature as soon as possible to each of the above individuals inviting their participation. Keep me informed about dates of meetings, in case I am able to attend. I look forward to periodic progress reports, and to seeing the final products of your endeavors.

The NPS, like other bureaus throughout government, is committed to "reinventing the National Park Service" as a result of the National Performance Review. This Working Group can assist us in achieving a significant portion of our goal. Although this directive does not cover the Tribal Cultural Preservation Program, which is still in its formative stages, I know you agree that the program is to be invented following the same principles.

# DIRECTOR'S LETTER



United States Department of the Interior

NATIONAL PARK SERVICE  
P.O. Box 37127  
Washington, D.C. 20013-7127



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NOV 5 1993

Mr. Roger Williams, Chairman  
National Park System Advisory Board  
Jacobs Engineering Group, Inc.  
1212 New York Avenue, NW, Suite 1050  
Washington, DC 20005

Dear Chairman Williams:

As has been discussed informally with you, we would like the National Park System Advisory Board to convene a special group of historic preservation officials and other knowledgeable individuals as a Historic Preservation Performance Review Committee to the Board. We recommend that this committee be chaired by Mr. Karl Komatsu, who also serves on the History Areas Committee. This Committee is to report through the National Park System Advisory Board in response to the following charge:

Advise the Director and the Secretary on ways of significantly improving customer service and reducing the volume, complexity, and whatever may be time-consuming or redundant in NPS-49 or in State or local procedures. In order to do this, the Committee is to identify the customers of the various levels of the partnership (e.g., SHPOs and CLGs may be customers of the NPS, private organizations and individuals, and Federal agencies seeking to comply with Section 106 may be customers of SHPOs and CLGs). The ultimate aim is to make the Federal, State, local, and private sector partnership in historic preservation fully effective and ensure that the Service's own technical assistance, grant-making, and administrative procedures are as efficient and simple as the law and responsible management allow.

As you know, the charter for the National Park System Advisory Board has been revised to allow Board committees to include persons other than Board members. We believe this enhances the utility of the Board, making it easier for you to obtain informed opinion on issues placed before you.

A committee including non-Board members need not be individually chartered. The Board chairman may invite non-Board members to participate in committees; they

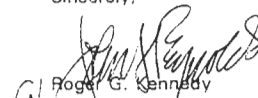
need not be "appointed" by the Secretary of the Interior. However, no non-Board member should be invited to serve without my written permission because the National Park Service needs to maintain control regarding their travel, including financial control. Travel authorizations will be required for all committee members traveling on committee business, whether or not the Service is reimbursing their expenses. Also, all committees should include at least one Board member.

Committee meetings that are not held "in the sunshine" must be limited solely to gathering information or conducting research for the Board, analyzing relevant issues and facts, and/or drafting proposed position papers for deliberation by the Board (41 CFR Part 101-6.1004 (k)). There should be a full substantive deliberation of any recommendations (within time limits) at the Board's next business meeting, which will be conducted "in the sunshine" with the opportunity for public participation.

Because of the short time to convene the Committee, we ask that you move quickly to invite the appropriate people to serve and to appoint the chair. Enclosed is a list of persons we recommend. We also have drafted proposed letters of invitation for your signature. Please send copies of all signed invitation letters to Ms. Antoinette Lee, c/o National Register of Historic Places, Interagency Resources Division, National Park Service, P. O. Box 37127, Washington, DC 20013-7127. Because time is short, I am taking the liberty of sending copies of this communication to all Board members and to those on the enclosed list.

I have directed Jerry Rogers to undertake the organization of the Committee. He has arranged for Joe Gorrell, Associate Director, Management Systems, to be the Committee's principal liaison. Antoinette Lee will serve as staff to Mr. Gorrell. I know you will enjoy working with them.

Sincerely,

  
Roger G. Kennedy  
Director

Enclosures

- (1) List of invitees to Committee membership
- (2) Proposed invitation letters

## ACTION PLAN

**T**wenty-eight years ago, the Federal government declared the protection of historic properties to be national policy. The National Historic Preservation Act (NHPA) of 1966, as amended, created a national historic preservation partnership among the Federal government, the States, local governments, Native American Tribes, and the private sector. The work achieved through this partnership has led to substantial success in identifying and protecting the nation's significant historic places. Hundreds of thousands of historic resources have been listed in Federal, State, and local registers. Federal, State, and local governments have established a variety of financial incentive programs as well as regulatory protection programs. Existing private preservation groups have grown, and new ones have come into being to influence public policy, to maintain historic properties, and to provide assistance to other historic property owners. In short, this partnership has moved the nation toward a preservation ethic that addresses an ever-broadening array of resources that tell the story of all Americans.

Despite the success of this national partnership, or perhaps because of that success, the national historic preservation program is now at a crossroads. Numerous examples across the country demonstrate the importance of historic preservation in rebuilding and maintaining sustainable communities, in fostering pride among our citizens, and in helping Americans understand who they are. These individual success stories, however, also paint a compelling picture of how much work remains to be done. The need for a strong, effective national historic preservation program is as great as ever. Several powerful ideas compel us to undertake a thorough reexamination of the way this program provides services to its clients and to the nation as a whole.

First, the 28-year-old partnership has attained a maturity marked by a vastly increased body of knowledge of appropriate preservation practice. A greatly enlarged institutional capacity at all levels of government that is designed to carry out those appropriate practices is a significant sign of this maturity. However, the rules, regulations, and review procedures established at the national level in too many instances remain based on an earlier time when detailed prescriptions and multiple reviews of products were deemed necessary to ensure high quality and national consistency. The time has come to rewrite the rules in recognition that high quality and national consistency can most effectively be achieved by replacing prescriptive and duplicative procedures with broad national standards that allow and rely upon State and local governments to implement a consistent, recognizable national program in ways that also respond to the diverse environments in which these partners function.

Second, the program's success in building a nationwide constituency for preservation also has created an enormous demand for service from that constituency. This demand far outstrips the current national program's ability to respond. At a time when public agency budgets for historic preservation are remaining flat or are diminishing, the national program must be revamped to eliminate outdated ways of doing business, so that starkly limited staff and financial resources can be reassigned wherever possible to address those needs and issues that represent the cutting edge of historic preservation in the 1990s. While it is unquestionably true that many of the nation's historic preservation needs cannot be met without increased public funding, it is equally true that some important needs can be effectively addressed by a careful reassignment of existing resources.

Third, the Clinton Administration has strongly emphasized the urgent need to "reinvent" government in ways that lead to a smaller yet more effective Federal government. The Vice President's Report on Reinventing Government offers both a philosophical framework and a series of specific recommendations that have particular relevance to any

thoughtful reexamination of the national historic preservation program. In particular, the report's call for enabling the work force to perform more effectively by moving decision-making to the lowest appropriate level in the service delivery hierarchy offers pertinent guidance to this reexamination. Similar instruction is found in the call to improve the timeliness of service delivery to the program's clients. The report's call for reforming government-wide procedures for financial management offers hope for reducing the administrative burdens that fall on many of the projects that form an important part of the national historic preservation program.

In recognition of all of these powerful ideas, National Park Service Director Roger G. Kennedy established the Historic Preservation Performance Review Committee of the National Park System Advisory Board. Because the implementation of the national historic preservation program depends upon an effective partnership between governments and private organizations, the Director empaneled a committee that included representatives of the National Park System Advisory Board, the National Park Service, State Historic Preservation Offices (SHPOs), local government preservation commissions, the Advisory Council on Historic Preservation, and the National Trust for Historic Preservation. Director Kennedy's charge to the Committee invoked the larger ideas that demand this reexamination, and it offered some specific guidance on the direction the Committee should follow in response to those ideas.

In addressing itself to the Director's charge, the Historic Preservation Performance Review Committee established five principles to guide its examination of the various elements of the national historic preservation program:

1. The National Park Service retains responsibility for establishing broad national standards and guidelines that ensure appropriate national consistency and high quality in the implementation of the national program.
2. In determining the most appropriate level of decision making in the national program, State Historic Preservation Offices and qualified local governments should be regarded as extensions of the service delivery hierarchy, rather than solely as recipients of service from the National Park Service.
3. The ultimate goal of any reassignment of existing human and fiscal resources is the achievement of greater preservation and protection of cultural resources throughout the country.
4. Every effort should be made to eliminate duplicative decision making at multiple levels of government.
5. Consistent with maintenance of high-quality standards, every effort should be made to increase the speed of service delivery; in addition, every effort should be made to improve customer access to the national program.

Finally, while the Committee focused the great majority of its efforts on examining elements within the national historic preservation program, it acknowledged that the pending reorganization of the National Park Service will affect how the Service addresses the needs of cultural resources both in the nation's communities and in the parks. Consequently, the reorganization inevitably will affect the quality of the preservation program's response to the main ideas that led to this reexamination. Consistent with its own emphasis on streamlined decision making within the preservation program, the Committee notes the importance of placing the program within a structure marked by hierarchical lines of authority and by clearly delineated, single points of decision making.

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## PREFACE

**T**he Historic Preservation Performance Review Committee conducted its review of the national historic preservation partnership over a three-month period. The Committee focused on the five major program areas that appeared most susceptible to the kind of reform set out in the Director's charge to the Committee: Historic Preservation Fund (HPF) Grant Administration for State and Local Governments, State Comprehensive Historic Preservation Plans, Certified Local Government (CLG) and Local Government Historic Preservation Programs, Preservation Tax Incentives, and the National Register of Historic Places. The Committee looked at how the program areas operate through all levels of government, and at how they interact with the private sector and program customers.

Other historic preservation program areas of the National Park Service were mentioned in the deliberations of the Committee because they are interrelated with those that were discussed in this report. They include the Historic American Buildings Survey/Historic American Engineering Record and the National Historic Landmarks program. Because of time constraints, the Committee was not able to address these areas and encourages the Director to examine them at some time in the near future.



## SUMMARY OF RECOMMENDATIONS

### HISTORIC PRESERVATION FUND (HPF) GRANT ADMINISTRATION FOR STATE AND LOCAL GOVERNMENTS

1. **RECOMMENDATION:** Revise and strip *National Register Programs Guideline (NPS-49)* down to legal program requirements; eliminate redundancy; eliminate program advice; update to reflect the 1992 Amendments of the NHPA and the recommendations of the Committee; improve clarity and usability. *(NPS action required, except whenever revisions to Federal-wide requirements are being proposed—which requires OMB approval.)*
2. **RECOMMENDATION:** Eliminate duplicative reviews; to the greatest extent possible, rely on State fiscal audit instead of State Program Review. *(NPS and Departmental action required.)*
3. **RECOMMENDATION:** Simplify NPS program oversight requirements; reexamine the level of accuracy required for End-of-Year Reports and remove to the extent possible stringent documentation requirements; reexamine the type of data tracked and eliminate data not legally required or necessary for responsible program oversight. *(NPS action required.)*
4. **RECOMMENDATION:** Eliminate the separate Continuation Grant Application; retain the “use or lose” policy in order to retain high obligation and expenditure rates for HPF grants. *(NPS action required.)*
5. **RECOMMENDATION:** Consolidate government-wide Federal grant assurances and certifications and increase dollar threshold for small purchase procurement procedures as recommended in Gore report. *(OMB action required.)*

### STATE COMPREHENSIVE HISTORIC PRESERVATION PLANS

1. **RECOMMENDATION:** Eliminate unnecessary NPS reviews and requirements.
  - ▶ Reduce NPS review and approval of State plans from 4 points to 1.
    - A. Eliminate requirement to prepare Planning Process Documents (eliminate NPS review and approval of draft and final Planning Process Documents). *(NPS action required.)*
    - B. Eliminate requirement for NPS review and approval of draft plan. *(NPS action required.)*
    - C. Eliminate review of plans in State Program Review. *(NPS action required.)*
  - ▶ Retain NPS review and approval of final plan.
  - ▶ Retain NPS review of a State’s annual grant application for its relationship to the State’s approved plan, but refrain from using the annual grant application review as a vehicle for re-reviewing an approved plan.
2. **RECOMMENDATION:** Simplify NPS approval of plans by limiting reviews to test the presence or absence of the following: evidence of meaningful public participation in development of the plan, consideration of the full range of cultural resources in the State, guidance for management of cultural resources in State, and a time frame for the plan. *(NPS action required.)*
3. **RECOMMENDATION:** Redirect the resources of NPS toward training and technical assistance that will build the capability of States to prepare and implement effective plans. *(NPS action required.)*

### CERTIFIED LOCAL GOVERNMENT (CLG) AND LOCAL GOVERNMENT HISTORIC PRESERVATION PROGRAMS

1. **RECOMMENDATION:** Revise CLG grant procedures to provide more flexibility to the States and simplify the grant administration procedures.
  - ▶ Revise *NPS-49* to accommodate use of CLG funds for innovative projects, such as joint ventures involving several CLGs and other private or public organizations. *(NPS action required.)*
  - ▶ Eliminate to the greatest extent possible subgrant administrative, audit, and reporting requirements for subgrants under \$10,000. Work with OMB and others to obtain the flexibility necessary. *(Departmental and OMB action required.)*
  - ▶ Allow more flexibility and simplicity in the calculation and documentation of the CLG matching share for HPF grants. Develop a simple formula for calculating the value of certain in-kind services, such as the routine work of a local preservation commission. *(Departmental and OMB action required.)*
2. **RECOMMENDATION:** Redirect NPS efforts toward more training and support for local government historic preservation programs, in order to build their capability to participate in the national historic preservation partnership.
  - ▶ Assist the National Alliance of Preservation Commissions in developing a national forum for exchange of CLG information and innovative ideas. *(NPS and State action required.)*
  - ▶ Establish and allocate resources to regularly scheduled training programs for local government historic preservation programs. *(NPS and State action required.)*

► Develop a vehicle or vehicles for coordinating project review by multiple levels of government, in order to increase the speed of service to the customer and to minimize inconsistency in the reviews. *(NPS and State action required.)*

**3. RECOMMENDATION:** Revise *NPS-49* to provide that, where NPS has approved a State's criteria and procedures for certifying local governments, State approval of a local application shall constitute certification of that locality. *(NPS action required.)*

### PRESERVATION TAX INCENTIVES

**1. RECOMMENDATION:** Simplify the review process to provide that, where NPS has determined that a SHPO is qualified and willing to assume responsibility for final certification decisions, State decisions shall constitute final action necessary for project certification. Retain NPS responsibility for ensuring consistency and continuing conformity with national standards through regular monitoring of State decisions. Retain NPS responsibility for hearing appeals from any applicant denied certification by the State.

► Determine how qualified SHPOs can be granted authority to approve Parts 1, 2, and 3 of the historic preservation certification application subject to appropriate NPS oversight. If necessary, pursue amendments to the law. *(Departmental action required; Legislative action may be required.)*

► Redirect the resources of NPS toward building the capability of all States to assume additional programmatic and certification authorities through training and technical assistance. *(NPS action required.)*

**2. RECOMMENDATION:** Modify fee requirements to provide for a consolidated collection schedule and retention of fees to support the program.

► Eliminate two-step fee collection process—collect all fees at once. *(NPS action required.)*

► Pursue legislative authority that will provide for retention of fees collected for program administration (at Federal and State levels) rather than returning fees to the U.S. Treasury. *(Legislative action required.)*

**3. RECOMMENDATION:** Provide additional training geared to prospective project sponsors and provide specialized training for the States on complex treatment issues.

► Redirect NPS resources to provide training and wider dissemination of technical information to developers and other prospective applicants on appropriate preservation treatments to be applied in projects seeking tax credit certification. *(NPS action required.)*

► Redirect NPS resources to provide onsite workshops in the States that focus on issues that represent recurring problems in the review of certification applications. *(NPS action required.)*

### NATIONAL REGISTER OF HISTORIC PLACES

**1. RECOMMENDATION:** Redirect NPS, State, and local resources to develop an array of educational products and initiatives using National Register documentation and other sources. *(NPS, State, and local government, and private sector action required.)*

**2. RECOMMENDATION:** Redirect the resources of NPS and SHPOs toward building the capability of Federal, State, and local governments, and the public to prepare nominations to the National Register. *(NPS and State action required.)*

**3. RECOMMENDATION:** Simplify and shorten the processes and requirements at the State and Federal levels for nominating properties to the National Register.

► Eliminate duplicative public notification requirements by relying on the federally prescribed notice issued by the States and eliminating the subsequent *Federal Register* notice published by NPS. *(Legislative action may be required.)*

► Encourage SHPOs to examine their National Register processing and documentation requirements and reduce them when they exceed Federal requirements. *(State action required.)*

► Provide information on how State review boards are used or administered throughout the country; encourage States to simplify their processes. *(NPS and State action required.)*

► Eliminate the requirement for State review boards to meet face-to-face on non-controversial nominations. *(NPS action required.)*

**4. RECOMMENDATION:** Become a full participant in the “information highway” of the future by making accessible to a wide range of current and potential users the substantial quantity of historic resource information residing with public agencies and private organizations.

► Direct the NPS and SHPOs to work toward a consistent format for maintaining and making accessible National Register, determination of eligibility, and survey and inventory information by the end of the century. *(NPS and State action required.)*

► Secure adequate funding for computerization of cultural resources information, particularly for SHPOs. *(Legislative and NPS action required.)*

► Make cultural resources information readily available for variety of uses. *(NPS and State action required.)*

► Provide training for States, CLGs, Federal agencies, and other governmental entities in computerizing historic resource data. *(NPS action required.)*

► Coordinate government-sponsored documentation efforts both within and outside NPS in order to avoid duplication of work and to achieve several products with a single documentation effort. *(NPS action required.)*

**5. RECOMMENDATION:** Determine how qualified government entities can be granted authority to list properties in the National Register. If necessary, pursue amendments to the law to accomplish this objective. *(Departmental action required; Legislative action may be required.)*

# HISTORIC PRESERVATION FUND (HPF) GRANT ADMINISTRATION FOR STATE AND LOCAL GOVERNMENTS

## I. BACKGROUND

The Historic Preservation Fund (HPF) was created to carry out the National Historic Preservation Act in partnership with States and local governments. Since the inception of the historic preservation grant program in 1968, the Federal government has invested \$696 million along with a State and local investment of more than \$536 million to preserve significant aspects of our national heritage.

## II. PROBLEM STATEMENT

The combination of government-wide and NPS requirements for fiscal accountability and program reporting is excessive.

## III. OBJECTIVE

Achieve maximum administrative efficiency, simplicity, and flexibility within legal requirements.

**RECOMMENDATION:** Revise and strip *National Register Programs Guideline (NPS-49)* down to legal program requirements; eliminate redundancy; eliminate program advice; update to reflect the 1992 Amendments of the NHPA and the recommendations of the Committee; improve clarity and usability. *(NPS action required, except whenever revisions to Federal-wide requirements are being proposed—which requires OMB approval.)*

**RECOMMENDATION:** Eliminate duplicative reviews; to the greatest extent possible, rely on State fiscal audit instead of State Program Review. *(NPS and Departmental action required.)*

**RECOMMENDATION:** Simplify NPS program oversight requirements; re-examine the level of accuracy required for End-of-Year Reports and remove to the extent possible stringent documentation requirements; reexamine the type of data tracked and eliminate data not legally required or necessary for responsible program oversight. *(NPS action required.)*

**RECOMMENDATION:** Eliminate the separate Continuation Grant Application; retain the “use or lose” policy in order to retain high obligation and expenditure rates for HPF grants. *(NPS action required.)*

**RECOMMENDATION:** Consolidate government-wide Federal grant assurances and certifications and increase dollar threshold for small purchase procurement procedures as recommended in Gore report. *(OMB action required.)*

Striking the proper balance between simplicity and accountability has been and remains the main policy goal of NPS’s grants administration. NPS has worked in partnership with States to reduce requirements consistent with a reasonable assurance that compliance with all program and OMB requirements is achieved. For example, as a result of its previous reduced review initiative adopted in 1991, NPS no longer reviews approximately 800 subgrant project notifications and subsequent completion reports. Building on this foundation, requirements for fiscal accountability and program reporting can and should be simplified further.

NPS can revise, reorganize, and simplify *NPS-49* as outlined in the recommendations without substantive review by the Department and OMB except where proposed changes conflict with 43 CFR 12, OMB Cost Principles, and other Federal-wide grants requirements. NPS also can integrate the 1992 Amendments to the NHPA and the recommendations of the Committee into the revised *NPS-49*.

Section 101(b)(2) of the NHPA, as amended, allows the Secretary to accept the substitution of State fiscal audits for parts of the State Program Review so long as the State audits establish and maintain substantially similar accountability standards, and are performed by qualified, independent auditors. Reliance on such State audits would eliminate the duplicative review of up to one third of the current State Program Review questions. Accordingly, an Audit Compliance Guide for the HPF grant program should be issued by NPS, in conjunction with the Department’s Office of the Inspector General, to incorporate instructions to fiscal auditors for checking specific HPF grant requirements.

When the State fiscal audit verifies SHPO compliance with the revised Audit Compliance Guide (or with the specific inquiries of *NPS-49*, Chapter 31), NPS would not reexamine those inquiries during the next State Program Review. If a fiscal audit does not indicate that these compliance issues were examined, or if the fiscal audit indicates noncompliance, NPS would examine those inquiries in its State Program Review.

Because many grantees devote considerable time to compiling and tracking data by program area, current reporting requirements should be rigorously reviewed with an eye toward eliminating all unnecessary administrative burdens. NPS should also clarify the minimum acceptable procedures and documentation for generating End-of-Year Report data, so that States do not do more than is necessary to generate acceptable data.

The existing NPS “use or lose” policy encourages high obligation and expenditure rates and effectively redirects funds not used by one State to another State within the time made available by the appropriation, so that these funds are not later returned to the U.S. Treasury as expired funds. The policy is a good one, but its implementation can and should be simplified. Specifically, the requirement for a Continuation Grant Application and agreement separate and apart from the annual grant should be eliminated. The current process for review of the States’ End-of-Year Reports can be slightly modified to ensure the continuing high obligation and expenditure rates that states now maintain.

OMB action is required to consolidate the signature requirement for the following Federal grant forms: SF 424B (Nonconstruction Assurances), SF 424D (Construction Assurances), Debarment and Suspension Certification, Drug-Free Workplace Certification, Lobbying Certification, and Title VI Civil Rights Compliance Certification.

Small purchase procedures are a simpler method of awarding contracts that involve less paperwork and documentation than other procurement procedures. Currently, OMB has a Federal-wide requirement that only grant-assisted contracts of less than \$25,000 may be awarded using small purchase procedures. Subject to a State’s own procurement procedures, an increase in the dollar threshold for use of small purchase procedures would reduce administrative burdens for grant recipients.

#### **IV. APPROPRIATE ROLES**

**National Park Service:** A) Formulate policy for grants management based upon legislative and administrative mandates; B) provide technical assistance and training in grants administration to grantees (who in turn train subgrantees); C) review HPF grant applications; award grants; review grant amendments and reports; D) assess performance through State Program Reviews to ensure reasonable accountability and compliance with applicable laws and regulations; E) compile national program information and statistics; and F) serve as liaison to the Office of Management and Budget (OMB) and to the U.S. Department of the Interior and its Office of Inspector General regarding accountability of HPF grant program.

**State:** A) Set subgrant selection criteria; review subgrant applications; award subgrants; B) select and award contracts; C) monitor subgrants/contracts to ensure that quality work is done and that all grant requirements are met; D) perform grant-supported historic preservation work with State staff; and E) provide technical assistance, training, and program information to property owners, subgrantees, Federal agencies, local governments, and the general public.

**Subgrantee (local governments, universities, non-profit corporations, or individuals):** A) Perform grant-assisted subgrant work meeting all grant conditions and requirements; and B) provide technical assistance, training, and program information to property owners and other members of the public.

## STATE COMPREHENSIVE HISTORIC PRESERVATION PLANS

### I. BACKGROUND

Statewide historic preservation planning guides State Historic Preservation Office decision making by analyzing relevant issues and trends, assessing pertinent strengths and weaknesses, and identifying opportunities for coordination with other State and local goals and policies. The National Historic Preservation Act requires SHPOs to develop and implement such a plan.

### II. PROBLEM STATEMENT

The current requirements for preparing and reviewing a State plan require an inordinate commitment of staff time at both the State and the Federal levels, well beyond the perceived benefit of that investment. Plans are subject to burdensome procedures that require four points of NPS review and approval with emphasis on “process” rather than “product.” Resulting plans may be more responsive to NPS requirements than to the needs of the States.

### III. OBJECTIVE

Provide maximum flexibility to the States to prepare their plans.

**RECOMMENDATION:** Eliminate unnecessary NPS reviews and requirements.

- ▶ Reduce NPS review and approval of State plans from 4 points to 1.
  - A. Eliminate requirement to prepare Planning Process Documents (eliminate NPS review and approval of draft and final Planning Process Documents). *(NPS action required.)*
  - B. Eliminate requirement for NPS review and approval of draft plan. *(NPS action required.)*
  - C. Eliminate review of plans in State Program Review. *(NPS action required.)*
- ▶ Retain NPS review and approval of final plan.

▶ Retain NPS review of a State’s annual grant application for its relationship to the State’s approved plan, but refrain from using the annual grant application review as a vehicle for re-reviewing an approved plan.

**RECOMMENDATION:** Simplify NPS approval of plans by limiting reviews to test the presence or absence of the following: evidence of meaningful public participation in development of the plan, consideration of the full range of cultural resources in the State, guidance for management of cultural resources in State, and a time frame for the plan. *(NPS action required.)*

**RECOMMENDATION:** Redirect the resources of NPS toward training and technical assistance that will build the capability of States to prepare and implement effective plans. *(NPS action required.)*

A State comprehensive historic preservation plan is worthwhile only if it leads to improved decision making in the management of a State’s cultural resources. To meet this test a plan must respond effectively to the unique needs and customers of each State. Given the variety of circumstances surrounding the development and implementation of a State historic preservation plan, the NPS should provide States with maximum flexibility in this program area.

Reducing the points at which NPS reviews and approves the State plan and altering the nature of that review simply to test for the presence of fundamental elements accomplishes three important goals. First, it acknowledges the need for flexibility in addressing diverse conditions. It recognizes that decisions on the specifics of State plans are best made at the State level. Second, it appropriately defines the level at which NPS will measure and maintain national consistency. While acknowledging that the content, the processes, and even the overall quality of State plans will inevitably vary from State to State, NPS will ensure that State efforts

fall within the broad parameters that define acceptable planning. Finally, this reform allows for redirection of NPS staff effort to more effective use.

Within the planning program, that redirection should include training that is more focused on States that have limited planning capabilities or that face particularly difficult problems. In addition, NPS could improve the level of State planning generally by regularly disseminating what it learns from reviewing State plans.

In developing and implementing a comprehensive historic preservation plan, the State should foster grassroots public participation, not only as a guide for State efforts but as a vehicle for influencing decisions at the local level, where planning, zoning, and building code decisions are made. States should encourage local governments to integrate historic preservation concerns into local plans and planning activities. State historic preservation plans also should be coordinated with other State government agencies that affect development activities, such as transportation, housing, and education.

### III. APPROPRIATE ROLES

**National Park Service:** A) Set broad national standards for preservation planning; B) provide technical assistance and guidance to States and program stakeholders nationwide; and C) provide oversight to ensure that State plans fall within national standards.

**States:** Develop a planning process and a comprehensive statewide historic preservation plan that A) meets the unique needs and customers of States; and B) meets broad national standards for planning.

**Local Governments:** A) Integrate historic preservation concerns into local plans and planning activities; and B) participate in the development of State comprehensive historic preservation plans so they adequately reflect local planning concerns.

# CERTIFIED LOCAL GOVERNMENT (CLG) AND LOCAL GOVERNMENT HISTORIC PRESERVATION PROGRAMS

## I. BACKGROUND

Local governments play a vital role in historic preservation in America. In recognition of this important role, the 1980 amendments to the National Historic Preservation Act established the Certified Local Government (CLG) program in order to extend the national historic preservation partnership to qualified local governments. Each year, States must award at least 10% of their Historic Preservation Fund allocation to CLGs. Of the more than 2,000 local governments that have preservation commissions today, 875 have become CLGs. By offering models for effective local programs, ready access to helpful information, and the prospect of modest funding support, the CLG program has served as a catalyst for establishing local preservation commissions and for improving the quality of local programs. Preservation at the local level has proven to be a cost-effective means of protecting historic properties and building a preservation constituency.

## II. PROBLEM STATEMENT

While local preservation efforts have grown and improved across the country, much room remains for needed improvement. The demand for training and technical assistance exceeds that available from NPS and SHPOs. The CLG program has had notable success in enhancing local preservation, but fewer than half of the local governments with preservation programs have become CLGs.

The CLG program offers only limited financial assistance: while the 10% pass-through provision represents a minimum requirement and not a legal ceiling, other State program requirements make increased CLG funding unlikely at current appropriation levels. Local preservation programs have minimal budgets and so find the CLG grant matching requirements difficult or impossible to meet; administrative requirements attached to CLG grants are excessive when compared to the amount of the grant. In short, many local governments conclude that meeting the programmatic and administrative requirements of the CLG program is not worth the return on their investment.

Certifying a locality to participate in the CLG program involves duplicate review of the local application by the State and by NPS.

Where a historic preservation project is subject to multiple reviews pursuant to various programs administered by local, State, and Federal agencies, the lack of coordination among those reviews can lead to inconsistent decisions for the project sponsors.

## III. OBJECTIVE

Increase and improve local government participation in implementing and administering the National Historic Preservation Act.

**RECOMMENDATION:** Revise CLG grant procedures to provide more flexibility to the States and simplify the grant administration procedures.

► Revise *NPS-49* to accommodate use of CLG funds for innovative projects, such as joint ventures involving several CLGs and other private or public organizations. (*NPS action required.*)

► Eliminate to the greatest extent possible subgrant administrative, audit, and reporting requirements for subgrants under \$10,000. Work with OMB and others to obtain the flexibility necessary. (*Departmental and OMB action required.*)

► Allow more flexibility and simplicity in the calculation and documentation of the CLG matching share for HPF grants. Develop a simple formula for calculating the value of certain in-kind services, such as the routine work of a local preservation commission. (*Departmental and OMB action required.*)

**RECOMMENDATION:** Redirect NPS efforts toward more training and support for local government historic preservation programs, in order to build their capability to participate in the national historic preservation partnership.

► Assist the National Alliance of Preservation Commissions in developing a national forum for exchange of CLG information and innovative ideas. (*NPS and State action required.*)

► Establish and allocate resources to regularly scheduled training programs for local government historic preservation programs. (*NPS and State action required.*)

► Develop a vehicle or vehicles for coordinating project review by multiple levels of government, in order to increase the speed of service to the customer and to minimize inconsistency in the reviews. (*NPS and State action required.*)

Because the Certified Local Government program is the national program's principal means for improving local historic preservation programs, every effort should be made to make the CLG program as attractive as possible. Simplified grant administration requirements, greater flexibility for matching requirements and reporting methods, and greater accommodation of innovative projects would all add to the program's attractiveness without compromising its integrity. In addition, placing a monetary value on the work of the local preservation commission would not only assist localities in meeting matching share requirements for grants, it would also affirm that this local activity is an important component of the national program.

Performing effectively at the local level requires training and technical assistance in preservation theory, design, meeting procedures, land use law, and public relations. A strong commitment is needed to establish a national forum for the exchange of CLG information and ideas and a national training program. Local government-oriented training programs should also include training for State and Federal government personnel.

#### IV. OBJECTIVE

Eliminate duplicative reviews and approvals of local certification applications.

**RECOMMENDATION:** Revise *NPS-49* to provide that, where NPS has approved a State's criteria and procedures for certifying local governments, State approval of a local application shall constitute certification of that locality. (*NPS action required.*)

The NPS currently approves each SHPO's guidelines for the CLG program. In addition, NPS reviews each individual certification application to determine whether the State has appropriately applied those approved guidelines in recommending certification. Eliminating the NPS review of State decisions affirms the States' ability to make appropriate decisions pursuant to approved guidelines, reduces the time needed to give the local government a final decision, and frees up NPS staff time for reallocation to more effective uses.

NPS would maintain national program consistency through its approval of State guidelines for certification. It would test continuing State compliance through the State Program Review, rather than through double review of individual applications. Finally, NPS would hear appeals from any locality that feels aggrieved by a State decision.

#### V. APPROPRIATE ROLES:

**National Park Service:** A) Provide standards; B) hear appeals; and C) provide technical assistance, training, and publications.

**States:** A) Administer CLG and local government program, including approval of CLG status for local governments; B) provide technical assistance; and C) coordinate reviews of Preservation Tax Incentives projects.

**Local Governments:** A) Administer appropriate elements of the national historic preservation program at the local level; B) designate and protect historic properties at the local level, and C) oversee rehabilitation of historic properties at the local level. Responsibility for administering National Historic Preservation Act programs (except the Preservation Tax Incentives program) should be extended to qualified local governments that request it and meet the professional and experience requirements of SHPOs.

## PRESERVATION TAX INCENTIVES

### I. BACKGROUND

The purpose of the Preservation Tax Incentives program is to stimulate private investment in the rehabilitation of certified historic buildings. Since 1976, the Preservation Tax Incentives have spurred the rehabilitation of 25,000 historic buildings representing more than \$16 billion in private investment.

### II. PROBLEM STATEMENT

The Preservation Tax Incentives program currently requires reviews at the State and Federal levels. In the overwhelming majority of cases, those reviews produce the same result. In a very few cases, inconsistent application of review standards by the States and the National Park Service results in disagreement between the State and NPS. Consequently, applicants can experience uncertainty regarding program requirements. In any event, the duplicative review lengthens the time necessary for delivery of service to the customer.

There is a lack of regularly scheduled training for program personnel and for project sponsors on appropriate rehabilitation treatments. The demand for technical assistance in all phases of the tax incentive program exceeds the capability of NPS and SHPOs.

The requirements for collecting fees in two increments and for remitting those fees to Treasury instead of retaining them to offset program costs need modification.

### III. OBJECTIVE

Maintain nationally consistent project certification decisions in a review process that eliminates duplicative reviews, shortens review periods, and provides for increased responsibility for the States.

**RECOMMENDATION:** Simplify the review process to provide that, where NPS has determined that a SHPO is qualified and willing to assume responsibility for final certification decisions, State decisions shall constitute final action necessary for project certification. Retain NPS responsibility for ensuring consistency and continuing conformity with national standards through regular monitoring of State decisions. Retain NPS responsibility for hearing appeals from any applicant denied certification by the State.

► Determine how qualified SHPOs can be granted authority to approve Parts 1, 2, and 3 of the historic preservation certification application subject to appropriate NPS oversight. If necessary, pursue amendments to the law. (*Departmental action required; Legislative action may be required.*)

► Redirect the resources of NPS toward building the capability of all States to assume additional programmatic and certification authorities through training and technical assistance. (*NPS action required.*)

**RECOMMENDATION:** Modify fee requirements to provide for a consolidated collection schedule and retention of fees to support the program.

► Eliminate two-step fee collection process—collect all fees at once. (*NPS action required.*)

► Pursue legislative authority that will provide for retention of fees collected for program administration (at the Federal and State levels) rather than returning fees to the U.S. Treasury. (*Legislative action required.*)

Two categories of State involvement are proposed: **expanded participation** States and **regular participation** States. **States may elect to maintain the status quo or to apply for expanded participation status.** The NPS role will vary according to State involvement. NPS should monitor decision making by expanded participation States through informal and regularly scheduled consultations. Rescission of expanded participation status could be triggered by loss of qualified staff, evidence of a lack of in-depth review, and significant deviations from established policies and guidance. When problems are identified, a “probationary” period should be established to resolve them.

When SHPOs assume expanded participation status, there may be increased pressure on them to approve controversial projects. To provide a “safety valve” for those SHPOs, NPS should become formally involved in review and certification decisions when requested by the State.

If fees are retained, they should be collected in full only upon project completion. NPS should obtain legislative approval to establish a special NPS account to receive and retain fees. Since expanded participation States would be managing most of the certification process, some mechanism should be established for sharing a portion of the review fees with those States.

### IV. OBJECTIVE

Improve the quality of projects proposed for certification and enhance the States’ capacity to evaluate problematic proposals.

**RECOMMENDATION:** Provide additional training geared to prospective project sponsors and provide specialized training for the States on complex treatment issues.



► Redirect NPS resources to provide training and wider dissemination of technical information to developers and other prospective applicants on appropriate preservation treatments to be applied in projects seeking tax credit certification. (*NPS action required.*)

► Redirect NPS resources to provide onsite workshops in the States that focus on issues that represent recurring problems in the review of certification applications. (*NPS action required.*)

NPS has developed a significant number of publications to assist applicants with meeting the Secretary's Standards for Rehabilitation. NPS also has held workshops with State staffs. However, limited resources have prevented these publications from being distributed to a wide audience. Similarly, training programs have not been held often or on a regular schedule. When they are held, many States cannot afford to send staff.

Redirecting NPS resources to increased distribution of publications and regularly scheduled training programs in the States is a cost-effective means of encouraging public participation in the tax incentives program and assuring high quality rehabilitation work.

### III. APPROPRIATE ROLES

**National Park Service:** A) Provide national leadership for the program and monitor quality of State decisions; B) ensure consistency with program guidelines; C) provide preservation and technical training for SHPOs and others through a variety of activities, such as site visits, conferences, workshops, special regional projects, technical services, and guidance (stan-

dards, guidelines, and publications); D) target efforts so that States can achieve expanded participation; E) collect customer surveys, perform nationwide data analysis; F) serve as liaison with the IRS, Treasury, and Advisory Council (to eliminate duplicative Section 106 and Tax Act reviews); and G) continue role of NPS Chief Appeals Officer in handling all appeals of certification denials.

**States:** Two categories of State involvement are proposed: **expanded participation** and **regular participation**. States may elect to maintain the status quo or to apply for expanded participation status. Under **expanded participation**, SHPOs will take the lead for reviews leading to certification (Parts 1, 2, and 3; determinations of individual listing, locally certified districts, project amendments). They will provide technical services and assistance to property owners, design professionals, and project personnel, as well as to CLGs. If possible under the existing statute, expanded participation States, rather than the NPS, will make actual certification decisions. In these situations, the current 30 day review time for the NPS will be eliminated. SHPOs will be responsible for project data collection and maintenance of file archives and for forwarding copies of certification decisions to the NPS (for transmittal to the IRS).

If full extension of authority is *not* possible under existing statute, new legislation should be investigated. In the meantime, an alternative proposal should be adopted through regulation to reduce substantially the project documentation reviewed by the NPS (e.g., the application form, State Evaluation Sheet, and selected photographs). In this situation, the 30-day NPS review period should be cut to 15 days for applications from expanded participation States.

Under **regular participation**, States will maintain the status quo; that is, they will provide reviews and recommendations on Parts 1, 2, and 3 applications, as well as recommendations on amendments. NPS will continue to review all documentation and make final certification decisions.

The criteria for expanded participation are key to implementing these recommendations. Three thresholds are proposed. First, expanded participation States must have qualified staff, such as architectural historians, historical architects, or historians with training in technical and design review. Second, State reviews must be in-depth, and professional. Third, the State's past record of recommendations should be largely consistent with NPS final decisions. Other factors to consider are the track record of timely reviews and willingness to collect needed data and manage file archives. The partnership aspect of this approach is important: qualified States will have regularly scheduled on-site consultations with NPS.

# NATIONAL REGISTER OF HISTORIC PLACES

## I. BACKGROUND

The National Register of Historic Places was created to recognize significant properties worthy of preservation. Since the passage of the National Historic Preservation Act in 1966, more than 62,000 properties have been entered into the National Register. These properties include districts, sites, buildings, structures, and objects that encompass more than 900,000 historic and archeological resources.

## II. PROBLEM STATEMENT

The National Register has not yet approached its full potential in fostering the preservation of significant properties. First, as a planning tool, the National Register is far from complete: thousands of properties worthy of National Register recognition remain unlisted because they are unidentified, and because the nomination process can be lengthy and technically demanding. Second, as an educational tool, the National Register's potential for reshaping public attitudes has been only partially realized.

The National Register process requires multiple review levels and has duplicative public participation requirements. The level of documentation required for nominations appears appropriate, but some States impose requirements beyond that of the NPS. The demand for technical assistance in identifying resources and preparing nominations far exceeds the capability of NPS and SHPOs. A large percentage of the information on cultural resources is not easily accessible.

## III. OBJECTIVE

Use the National Register more effectively to foster a national preservation ethic, promote a greater appreciation of America's heritage, broaden the general public's understanding of what is worth saving, and increase public awareness of preservation issues.

**RECOMMENDATION:** Redirect NPS, State, and local resources to develop an array of educational products and initiatives using National Register documentation and other sources. (*NPS, State, and local government, and private sector action required.*)

Knowledge of historic places is a fundamental step in fostering public support for their preservation. The National Register has played a key role in improving public appreciation for historic properties, but the current educational programs based on the National Register need to be increased and more widely disseminated. The National Park Service and its State, local, and private partners should greatly expand efforts like the Teaching with Historic Places program, with the goal of seeing historic preservation become a standard part of American education and a more widely held value of American society.

## IV. OBJECTIVE

Increase the number of properties being entered into the National Register of Historic Places each year.

**RECOMMENDATION:** Redirect the resources of NPS and SHPOs toward building the capability of Federal, State, and local governments, and the public to prepare nominations to the National Register. (*NPS and State action required.*)

**RECOMMENDATION:** Simplify and shorten the processes and requirements at the State and Federal levels for nominating properties to the National Register.

► Eliminate duplicative public notification requirements by relying on the federally prescribed notice issued by the States and eliminating the subsequent *Federal Register* notice published by NPS. (*Legislative action may be required.*)

► Encourage SHPOs to examine their National Register processing and documentation requirements and reduce them when they exceed Federal requirements. (*State action required.*)

► Provide information on how State review boards are used or administered throughout the country; encourage States to simplify their processes. (*NPS and State action required.*)

► Eliminate the requirement for State review boards to meet face-to-face on non-controversial nominations. (*NPS action required.*)

Preparing nominations for historic properties to the National Register of Historic Places involves several substantive and administrative steps. Nominations are forwarded to the National Register through nominating authorities, e.g., State Historic Preservation Officers (SHPOs) or Federal Preservation Officers (FPOs). The preparation of nominations can be performed by any interested person or public agency. However, the completed nomination form must be reviewed by qualified public agency staff and, if nominated through a SHPO, reviewed by the State Historic Preservation Review Board. Once the nomination reaches the National Park Service, it must be acted upon in 45 days. Part of that time requirement allows for the National Park Service to publish pending nominations in the *Federal Register*.

Public agency staff alone cannot begin to respond to the need and growing demand for an increased rate of National Register entries. Enabling more people to prepare competent nominations and expediting the review process are the keys to making the Register more complete and effective as a tool for planning and education.

## V. OBJECTIVE

Make National Register, determination of eligibility (DOE), and survey and inventory information more

readily available and usable for planning, compliance, preservation, and public education efforts.

**RECOMMENDATION:** Become a full participant in the “information highway” of the future by making accessible to a wide range of current and potential users the substantial quantity of historic resource information residing with public agencies and private organizations.

▶ Direct the NPS and SHPOs to work toward a consistent format for maintaining and making accessible National Register, DOE, and survey and inventory information by the end of the century. *(NPS and State action required.)*

▶ Secure adequate funding for computerization of cultural resources information, particularly for SHPOs. *(Legislative and NPS action required.)*

▶ Make cultural resources information readily available for variety of uses. *(NPS and State action required.)*

▶ Provide training for States, CLGs, Federal agencies, and other governmental entities in computerizing historic resource data. *(NPS action required.)*

▶ Coordinate government-sponsored documentation efforts both within and outside NPS in order to avoid duplication of work and to achieve several products with a single documentation effort. *(NPS action required.)*

During the past 28 years, the national historic preservation partnership—Federal, State, local governments; Indian tribes; private organizations; and other governmental entities—has collected information on hundreds of thousands of historic resources through survey and inventory activities, determinations of eligibility, and National Register nominations.

In order for the national historic preservation program to reach its full potential, it must become a full participant in the “information highway” of the future. Users of the information must have ready access to data on cultural resources in order to make informed decisions. This information must become computerized and maintained in forms that can be easily transmitted and retrieved between public agencies, private organizations, and individuals. An investment in computerizing this information will pay off in the future because it will be available early-on in governmental planning, environmental compliance, preservation, and public education activities.

#### VI. OBJECTIVE

Grant National Register listing authority to those qualified governmental entities that seek it, while maintaining NPS oversight and quality control.

**RECOMMENDATION:** Determine how qualified government entities can be granted authority to list properties in the National Register. If necessary, pursue amendments to the law to accomplish this objective. *(Departmental action required; Legislative action may be required.)*

During the 28 years since the passage of the National Historic Preservation Act, SHPOs, FPOs, Indian tribes, local governments, and other governmental entities have acquired considerable proficiency in preparing nominations. Since 1980, the NPS has reviewed nominations by exception, providing for substantive review only when technical problems are noted or for certain kinds of nominations.

While the National Register should remain a single, nationwide list administered by NPS, recognizing a qualified agency’s decision as registration rather than nomination will simplify the process and allow for redirection of resources toward the other recommendations of this section. NPS

would maintain national consistency and quality control through standards, guidelines, technical information, training, and State Program Review, rather than through double review of individual nominations.

#### VII. APPROPRIATE ROLES

**National Park Service:** A) Maintain the National Register and the National Register Information System (NRIS); B) provide standards, guidelines, technical information, and training; C) hear appeals for listings and DOEs; D) exert quality control over nominations submitted; E) develop educational products and initiatives using National Register documentation and other sources; and F) facilitate coordinated documentation and information management efforts to serve multiple uses.

**States:** A) Prepare, nominate, and list properties in the National Register; B) notify owners and provide public notification; C) maintain and make accessible NRIS and records for the State; D) maintain and make accessible data on surveys, inventories, and consensus DOEs in State; E) perform consensus DOEs; and F) develop educational products and initiatives using National Register documentation and other sources.

**CLGs, other Federal agencies, Indian tribes, and other governmental entities:** A) Prepare, nominate, and list properties in the National Register if the nominating agency meets the professional and experience requirements of SHPOs; and B) develop educational products and initiatives using National Register documentation and other sources.

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**RECOMMENDATION:** Become a full participant in the “information highway” of the future by making accessible to a wide range of current and potential users the substantial quantity of historic resource information residing with public agencies and private organizations.

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**States:** A) Prepare, nominate, and list properties in the National Register; B) notify owners and provide public notification; C) maintain and make accessible NRIS and records for the State; D) maintain and make accessible data on surveys, inventories, and consensus DOEs in State; E) perform consensus DOEs; and F) develop educational products and initiatives using National Register documentation and other sources.

#### **CLGs, other Federal agencies,**

#### **Indian tribes, and other governmental**

**entities:** A) Prepare, nominate, and list properties in the National Register if the nominating agency meets the professional and experience requirements of SHPOs; and B) develop educational products and initiatives using National Register documentation and other sources.



U.S. Department of the Interior  
National Park Service  
Cultural Resources

# NCSHPO

National Conference of State Historic Preservation Officers

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