

A Report by the

**NATIONAL ACADEMY OF
PUBLIC ADMINISTRATION**

*On Behalf of the Historic Preservation Performance Measures Team
For the U.S. Department of the Interior, National Park Service*

2009

**TOWARDS MORE MEANINGFUL
PERFORMANCE MEASURES FOR
HISTORIC PRESERVATION**



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January 2009



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The views expressed in this report are those of the individuals who served on the Academy's Historic Preservation Performance Measures Team and do not necessarily reflect the views of the Academy as an institution.

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FOREWORD

What can a government agency do when its current performance measures do not fully reflect the involvement of multiple partners and their work to produce a successful program? The National Park Service (NPS) turned to the National Academy to bring federal, state, and tribal preservation experts together to build consensus on improved performance measures for the National Historic Preservation Program. This Program is a dynamic partnership among state and local governments, tribes, property owners, and the private sector, working in concert with the National Park Service, the Advisory Council on Historic Preservation, and other federal agencies to preserve and constructively use historic properties in hundreds of communities nationwide. Far beyond merely “saving old buildings,” the partnership is a primary driver of economic development and community revitalization.

The National Academy believes that multi-disciplinary collaboration around complex problems can lead to important consensus and improved outcomes. The 14-member team convened for this project is no exception to this premise. Comprised of experts from two different disciplines (historic preservation and performance measurement) and multiple levels of government (federal, state and tribal), the team’s commitment and persistence produced a set of 17 performance measures for consideration by the broader historic preservation community.

The 17 performance measures outlined in this report represent an important step forward for the National Historic Preservation Program. Adoption and use of subsets of these measures by state and tribal historic preservation programs, National Park Service (NPS), Advisory Council on Historic Preservation, Office of Management and Budget (OMB), other federal agencies, and the Congress will document the important benefits of historic preservation and help to make preservation programs more effective at all levels.

On behalf of the National Academy, I would like to extend my appreciation to the members of the Historic Preservation Performance Measures Team for their hard work, critical thinking, volunteered time, and trust through this consensus-building process. Thanks also to the National Academy staff, advisors, and resource persons from NPS and OMB who informed the Team’s work.



Jennifer L. Dorn
President and Chief Executive Officer

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ACRONYMS

Academy	National Academy of Public Administration
ACHP	Advisory Council on Historic Preservation
DOI	U.S. Department of the Interior
CLG	Certified Local Government
FHWA	Federal Highway Administration
GPRA	Government Performance Results Act
HPPMT	Historic Preservation Performance Measures Team
HPF	Historic Preservation Fund
HUD	Department of Housing and Urban Development
NAGPRA	Native American Graves Protection and Repatriation Act
NATHPO	National Association of Tribal Historic Preservation Officers
NCSHPO	National Conference of State Historic Preservation Officers
NHP	National Historic Preservation Act
NPS	National Park Service
OMB	Office of Management and Budget
PART	Program Assessment Rating Tool
SHPO	State Historic Preservation Office
THPO	Tribal Historic Preservation Office

BACKGROUND

In 2007, the National Park Service (NPS) requested the National Academy of Public Administration (the Academy) undertake an independent review of the National Historic Preservation Program. The resulting December 2007 report by the Academy Panel, *Back to the Future: A Review of the National Historic Preservation Program*, concluded that the ambitious vision set forth by Congress in the National Historic Preservation Act of 1966 (NHPA) is largely being realized. At the same time, the Academy's 2007 Panel report identified a number of steps to strengthen the National Historic Preservation Program, including the recommendation that NPS engage states and tribes to develop performance measures that better reflect the outputs, outcomes, and impact of the National Historic Preservation Program.

With encouragement from the Office of Management and Budget (OMB), NPS decided to support a process that would convene key stakeholders to help build consensus on more meaningful performance measures. NPS asked the Academy to design a process to meet this objective and contracted with the Academy in June 2008 to carry out this project through a subcontract with the National Conference of State Historic Preservation Officers (NCSHPO), which also provided limited funding for the effort.

After considering more than 60 possible performance measures, the Historic Preservation Performance Measures Team (Team) that the Academy created ultimately recommended 17 measures for the consideration of the broader historic preservation community. This report describes the process the Academy designed to guide and inform the Team's deliberations and presents and explains the 17 performance measures the Team recommends.

APPROACH

This six-month project brought together experts from two different spheres: historic preservation and performance measurement. In consultation with NPS and several of its stakeholder organizations, the Academy appointed 14 experts in historic preservation to the Historic Preservation Performance Measures Team: four State Historic Preservation Officers (SHPOs); two Tribal Historic Preservation Officers (THPOs) and another expert in tribal preservation issues; three NPS staff; three individuals suggested by the Advisory Council on Historic Preservation (ACHP); and one other federal agency staff member. Team members were selected for their subject matter expertise in preservation and served as individuals, rather than as representatives of their parent organizations. Appendix A lists the individuals who volunteered their time to serve on the Team.

It deserves note that this project differed significantly from the Academy's traditional model. Instead of having a Panel of Academy Fellows direct the work and make recommendations to the agency client, Academy staff played a supporting role in facilitating the work of the Historic Preservation Performance Measures Team. Decision-making authority rested with the 14 members of this Team, and the recommendations presented in this report reflect their judgment. The Academy supported the work of the Historic Preservation Performance Measures Team with

the help of a number of individuals with expertise in performance measurement, including two Academy senior staff, one research assistant, and one Academy Fellow who served as a Senior Advisor. In addition, three other individuals served as resources and provided technical assistance to the Team: the technical staff person from NPS who is most conversant in calculating current performance measures; the examiner for NPS from OMB; and an expert in performance measurement on detail to OMB. Appendix B lists the Academy staff, consultants, and resource persons who supported the work of the Historic Preservation Performance Measures Team.

Over the course of the study, Academy staff guided and supported the Team in various ways, including:

- planning and facilitating meetings
- developing background materials for the Team's consideration
- briefing the Team on the basics of performance measurement and similar efforts, such as developing improved measures for the Community Development Block Grant program
- preparing meeting summaries
- conducting limited research
- writing the final report

Over the course of the project, Academy staff sought to gain input from the broader universe of SHPOs and THPOs through an online survey, a panel discussion at the National Association of Tribal Historic Preservation Officers' (NATHPO) annual conference, and a conference call with THPOs.

The primary background paper on performance measures that the Academy staff prepared for the Team is provided as Appendix C. Among other things, this paper provides definitions of key performance measurement terms, such as workload, inputs, outputs, outcomes, and efficiency measures.

KEY PROJECT STEPS

The Team met three times in person over the course of the project, including a 1½ day retreat, and held four conference calls. At the outset, the Team considered the origins of the National Historic Preservation Program based on a paper (Appendix D) developed by Antoinette J. Lee, an NPS staff member who served on the Team. The Team considered, but did not formally adopt, a draft mission statement for the National Historic Preservation Program (Appendix E), which was developed by an ad hoc subcommittee of Team members led by Paul Loether, an NPS staff member who served on the Team, and was modified by the Team.

As the foundation for developing performance measures, the Team focused on the purposes of the National Historic Preservation Act, which were parsed into the following eight areas:

1. preservation of, and mitigation of adverse impacts to, historic and archeological structures and landscapes
2. historic resources as a living part of community life
3. greater knowledge of historic resources
4. better means of identifying and administering historic resources
5. improved planning and execution of federal and federally assisted projects
6. economic growth and development
7. maximum encouragement to private undertakings
8. assistance to State and local governments and the National Trust to expand and accelerate their historic preservation programs and activities

Ultimately, the Team decided to develop performance measures in relation to three strategic goals derived from the purposes of the NHPA, as follows:

1. Preservation and Protection of Historic Properties and Places
2. Economic Development and Development of Community
3. Education, Awareness, and Inspiration

With the Academy staff's assistance, the Team pursued an iterative process over the course of the project that included brainstorming to postulate possible new measures, subjecting those measures to analysis and scrutiny, winnowing down the number of measures by eliminating those that seemed infeasible or less valuable, and refining the most promising measures. Altogether, the Team considered more than 60 different measures or permutations thereof (Appendix F). The Team used the following criteria to identify performance measures that, to the maximum extent possible:

1. relate directly to the mission
2. document changes resulting from program activities or strategies (a causal relationship)
3. show progress on near-term milestones (towards a longer-term goal)
4. rely on readily available, reliable and timely data (in some cases it being necessary to use intermediate outcomes because of data lag)
5. result in the least burdensome methods of data collection and reporting
6. are simple, easy-to-understand, and have public relations value
7. focus on *outcomes*, to the extent possible, supported by workload, inputs, and/or outputs

SCOPE AND APPLICATION OF PERFORMANCE MEASURES

At the outset, the Team considered a number of options for defining the scope and focus of improved performance measures. The first priority of NPS and the Team was performance

measures for SHPOs and THPOs, which receive annual formula grant allocations from the Historic Preservation Fund (HPF). Beyond that, NPS staff hoped to identify improved measures to support the agency's performance reporting under the Government Performance Results Act (GPRA) and in using the Program Assessment Rating Tool (PART). While accepting these priorities, the Team made a conscious decision not to limit development of new measures to these purposes and audiences. Rather, the Team recognized the need for performance measures for other activities funded by the HPF as well as the broader spectrum of activities authorized by the National Historic Preservation Act. The Team recognized the utility of improved measures to many different audiences, including: SHPOs, THPOs; NPS and ACHP; Certified Local Governments (CLGs), state and local executive agencies; state and local legislatures and tribal councils; preservation advocates at all levels; and the American public.

Early on, the Team recognized the impossibility that every performance measure could be applied consistently across the many different organizations involved in preservation. The Team therefore rejected the goal of developing "one-size-fits-all" measures and instead sought to develop measures that would be directly relevant to different agencies, organizations, and stakeholders involved in various activities that are vital to historic preservation. As a result, some of the performance measures recommended by the Team do not apply to all participants. For example, the significant differences between state and tribal historic preservation programs demand some unique measures, and make it inappropriate to apply all measures to both SHPOs and THPOs. The Team also notes that some measures can be used to make state-by-state or tribe-by-tribe comparisons, whereas other measures are designed and intended to reflect the overall impact and benefits of the National Historic Preservation Program. The Team hopes that the set of performance measures recommended will serve the range of historic preservation programs and activities.

INHERENT CHALLENGES TO MEASURING PERFORMANCE IN HISTORIC PRESERVATION

The National Historic Preservation Program is not a "program" in the conventional sense but a partnership of federal agencies; state, local and tribal agencies; and a variety of private sector interests. Indeed, the vast majority of historic preservation activities in the United States occur without any direct connection to any government agency, as private property owners maintain and rehabilitate historic properties they own. Nevertheless, government agencies' roles are critical to providing a coherent framework for historic preservation and span a broad spectrum of activities, including but not limited to the following:

- increasing public understanding of and appreciation for historic properties and places
- identifying historic properties through survey and inventory
- designating significant properties as historic and maintaining registries of such properties
- making information about historic properties widely available
- protecting historic properties through the encouragement and facilitation of easements and covenants

- setting standards and issuing technical guidelines for rehabilitating historic properties
- providing bricks and mortar grants to help rehabilitate historic properties
- providing financial incentives, such as tax credits, to rehabilitate historic properties
- ensuring that federal undertakings take historic properties into account
- acquiring and caring for historic properties of special significance

Each of these activities is integral to the fabric of historic preservation. None of these activities is sufficient in and of itself to guarantee the protection and preservation of historic properties in the United States. Moreover, efforts to protect and preserve historic properties are subject to many forces beyond the control of historic preservation programs, such as mortgage interest rates, local real estate markets, national economic conditions, natural disasters, etc.

Consistent with the accepted principles of performance measurement, the Team sought primarily to identify *outcome* measures to assess the actual impact of the National Historic Preservation Program, rather than measures of workload, inputs, or outputs. However, the diffused and distributed nature of the National Historic Preservation Program made it difficult to develop outcome measures in the strictest sense of the word. Recognizing these realities, the Team sought to develop measures that provide as meaningful an assessment as possible of the performance and impact of the Program.

At some point, there will be a need to develop detailed technical guidance for using each of the measures (beyond the technical guidance that appears occasionally below) in order to define terms, explain what should and should not be counted, and outline the documentation requirements.

CONSOLIDATED LIST OF SUGGESTED PERFORMANCE MEASURES

The Team recommends 17 performance measures (listed below and discussed in the following section) for consideration by the broader historic preservation community. Highest priority is placed on the nine measures highlighted in *bold italics*.

- 1. Number of properties inventoried and evaluated as having actual or potential historic value. (OUTPUT)**
- 2. Number of properties given historic designation by states, tribes, and CLGs. (OUTPUT/OUTCOME)**
3. Number of historic properties listed in the National Register of Historic Places. (OUTPUT/OUTCOME)
- 4. Number of historic properties protected. (OUTCOME)**
5. Percent of designated National Historic Landmarks in good condition. (OUTCOME)
- 6. Number of reported federal undertakings with a finding of no adverse effect on historic properties by agency. (OUTCOME)**
- 7. Number of reported federal undertakings with a finding of adverse effect on historic properties by agency. (OUTCOME)**
- 8. Number of Section 106 programmatic agreements in effect. (OUTPUT)**
- 9. Private capital leveraged by federal historic preservation tax credits. (OUTCOME)**
10. Number of housing units leveraged by federal historic preservation tax credits. (OUTCOME)
11. Number of affordable housing units leveraged by federal historic preservation tax credits. (OUTCOME)
- 12. Number of historic properties for which information is available on the Internet. (OUTPUT)**
- 13. Number of visitors to historic preservation websites. (OUTCOME)**
14. Number of Certified Local Governments. (OUTPUT)
15. Number of Preserve America communities. (OUTPUT)
16. Number of presentations on tribal cultural heritage. (OUTPUT)
17. Number of individuals trained in traditional practices and languages. (OUTPUT)

DISCUSSION OF SUGGESTED PERFORMANCE MEASURES

The Historic Preservation Performance Measures Team agreed that more meaningful performance measures can help to improve the performance of SHPOs, THPOs and federal agencies; highlight outstanding performance; and make a more compelling case for the benefits of historic preservation to justify greater resources at all levels.

The 17 measures listed below are not binding in any way, nor are they self-executing. This report is intended to focus constructive dialogue on performance measures and lead to the ultimate adoption and use of more meaningful performance measures by SHPOs, THPOs, NPS, ACHP, federal agencies, OMB, and the Congress.

The measures are grouped under the three strategic goals that guided the Team's deliberations. The Team places highest importance on the nine measures highlighted in *bold italics*.

Preserve and Protect Historic Properties and Places

1. *Number of properties inventoried and evaluated as having actual or potential historic value. (OUTPUT)*

Significance of Measure: Tracks annual progress in surveying and inventorying historic properties, providing the knowledge base on which preservation actions must rest.

Most Relevant To: SHPOs, THPOs, NPS, and federal agencies.

Span of Reporting/Tracking: By state, tribe, CLG and national totals.

Reporting Workload: Additional reporting of information that SHPOs and THPOs have on-hand.

Technical Guidance: Target survey and inventory resources to areas and properties that have potential historic value.

2. *Number of properties given historic designation by states, THPOs, or CLGs. (OUTPUT/OUTCOME)*

Significance of Measure: Tracks the cumulative number of historic properties designated by states, tribes, and CLGs (beyond those listed on the National Register), providing an important indicator of state, local, and tribal support for preservation. This measure complements measure #3 below.

Most Relevant To: SHPOs, THPOs, CLGs

Span of Reporting/Tracking: By state, tribe, CLG and national totals

Reporting Workload: No additional tracking or reporting

Comments: Based on the NHPA definition, the word "properties" includes archeological sites.

3. Number of historic properties listed in the National Register of Historic Places. (OUTPUT/OUTCOME)

Significance of Measure: Tracks the cumulative number of historic properties that receive the distinction of National Register listing. Complements measure #2 above.

Most Relevant To: NPS; SHPOs.

Span of Reporting/Tracking: By state, tribe, and national totals.

Reporting Workload: No additional tracking or reporting.

Comments: This is currently a PART measure.

4. *Number of historic properties protected. (OUTCOME)*

Significance of Measure: Tracks the number of historic properties protected as the result of core activities under NHPA, including the federal tax credit, Section 106 and other compliance activities, grants, and acquisition programs.

Most Relevant To: NPS, SHPOs, THPOs, CLGs.

Span of Reporting/Tracking: By state, tribe, CLG, and national totals.

Reporting Workload: No additional workload.

Comments: Excludes properties protected through HUD-funded rehabilitation and transportation enhancement projects (which the Team had initially considered including in this measure), because of the difficulty in tracking these data and the relative insignificance of the numbers of properties protected.

5. Percent of designated National Historic Landmarks in good condition. (OUTCOME)

Significance of Measure: Tracks the physical condition of National Historic Landmarks

Most Relevant To: NPS.

Span of Reporting/Tracking: National totals.

Reporting Workload: No additional workload.

Comments: Steward organizations perform annual visual inspections. “Good condition” refers to the maintenance or improvement of those elements of the property that made it eligible for NHL designation in the first place.

6. *Number of reported federal undertakings with a finding of no adverse effect on historic properties by agency. (OUTCOME)*

Significance of Measure: Tracks the number of reported federal undertakings, agency by agency, that avoid adverse effects on historic properties.

Most Relevant To: ACHP, federal agencies, SHPOs and THPOs.

Span of Reporting/Tracking: By federal agency and national totals.

Reporting Workload: SHPOs and THPOs would have to report federal undertakings under Section 106 by federal agency rather than the total number of federal undertakings.

Comments: See discussion below about measuring Section 106 outputs and outcomes

7. *Number of reported federal undertakings with a finding of adverse effect on historic properties by agency. (OUTCOME)*

Significance of Measure: Tracks the number of reported federal undertakings, agency by agency, that adversely affect historic properties.

Most Relevant To: ACHP, federal agencies, SHPOs and THPOs

Span of Reporting/Tracking: By federal agency and national totals.

Reporting Workload: Additional tracking for SHPOs and THPOs to report by federal agency.

Comments: See discussion below about measuring federal agencies' performance on Section 106.

8. *Number of Section 106 programmatic agreements in effect. (OUTPUT)*

Significance of Measure: The number of programmatic agreements in effect is important because such agreements relieve routine federal undertakings from the Section 106 review process, thus saving time for both federal agencies, SHPOs, and THPOs.

Most Relevant To: ACHP, SHPOs, THPOs, federal agencies.

Span of Reporting/Tracking: By SHPOs and THPOs, federal agencies, and national totals.

Reporting Workload: A one-time effort by ACHP, SHPOs, and THPOs to document the number of programmatic agreements in effect, followed by tracking of additional and expired agreements.

Technical Guidance: Each year's number will be calculated based on the number of programmatic agreements in effect as of the end of the previous federal fiscal year, plus the number of newly executed agreements, minus the number of agreements that lapsed during the reporting period.

Comments: See discussion below about measuring federal agencies' performance under Section 106 and developing an efficiency measure through a study to estimate the savings that result from programmatic agreements.

Economic Development and Development of Community

9. *Private capital leveraged by federal historic preservation tax credits. (OUTCOME)*

Significance of Measure: The amount of private capital leveraged is an important outcome of the tax credit program and a good proxy for this program's impact on rehabilitating historic properties and helping to rejuvenate economically depressed areas.

Most Relevant To: SHPOs, NPS.

Span of Reporting/Tracking: By state and national totals.

Reporting Workload: No additional workload. NPS tax credit program calculates private capital leveraged based on approval of Part 3 applications.

Comments: The Team urges states that have state historic preservation income tax credits to track and report the private capital leveraged.

10. Number of housing units leveraged by federal historic preservation tax credits. (OUTCOME)

Significance of Measure: Measures the public benefit of historic preservation tax credits in leveraging additional housing units.

Most Relevant To: NPS, SHPOs, CLGs.

Span of Reporting/Tracking: By state and national totals.

Reporting Workload: No additional reporting. NPS tax credit program draws the number of housing units leveraged from approved tax credit applications.

Comments: For most tax credit projects, multiple sources of funding and subsidies are used to finance projects, including other federal subsidies, such as the low-income housing tax credit.

11. Number of affordable housing units leveraged by federal historic preservation tax credits. (OUTCOME)

Significance of Measure: Measures the public benefit of historic preservation tax credits in leveraging additional affordable housing units.

Most Relevant To: NPS, SHPOs, CLGs.

Span of Reporting/Tracking: By state and national totals.

Reporting Workload: No additional reporting. NPS tax credit program draws the number of affordable housing units leveraged from approved tax credit applications.

Comments: For most tax credit projects, multiple sources of funding and subsidies are used to finance projects, including other federal subsidies, such as the low-income housing tax credit.

Education, Awareness, and Inspiration

12. *Number of historic properties for which information is available on the Internet.* (OUTPUT)

Significance of Measure: Having information about historic properties easily available online advances preservation in many ways. It raises awareness, and educates local residents and visitors about the historic context of buildings, neighborhoods, and landscapes, providing a sense of place. It also helps property owners, federal agencies, and

state and local governments to factor preservation into project planning earlier in the process.

Most Relevant To: NPS, SHPOs, some THPOs.

Span of Reporting/Tracking: By state, tribe, and national totals.

Reporting Workload: Additional reporting of information readily available to SHPOs and THPOs will be needed.

Technical Guidance: Information about sensitive sites must be protected to respect cultural values and prevent looting.

Comments: 1) This measure complements #13 below. 2) This measure would highlight the fact that many tribes lack the core capacity to create and maintain websites. 3) Because of the inherent efficiency in having information about historic properties available online, the Team views this as a “common sense” efficiency measure, even though it fails to measure direct monetary savings.

13. *Number of visitors to historic preservation websites. (OUTCOME)*

Significance of Measure: Tracks the volume of traffic on historic websites, which reflects the capacity of the websites to generate interest in historic preservation by the general public, travelers, researchers, and practitioners.

Most Relevant To: NPS, SHPOs, some THPOs.

Span of Reporting/Tracking: By state, tribe, and national totals.

Reporting Workload: Additional reporting by SHPOs and THPOs of readily available data.

Technical Guidance: 1) This measure will include SHPO and THPO websites and the historic preservation section of NPS website. 2) It will count the number of unique daily visits.

Comments: The Team rejected the option of endorsing online visitor satisfaction surveys based on SHPO experience that such surveys are infrequently completed and annoy some visitors. The Team considered the number of visitors the ultimate measure of satisfaction over time, because if visitors are not getting what they want, they will not return to the site. This measure complements measure # 12.

14. *Number of Certified Local Governments. (OUTPUT)*

Significance of Measure: Designation as a Certified Local Government is a formal measure of local political commitment to historic preservation. This commitment includes putting core program elements in place, such as establishing and maintaining a local inventory, establishing a community-wide historic preservation commission, participating in the National Register nomination process, and enforcing appropriate state and local laws for the designation and protection of historic and prehistoric properties.

Most Relevant To: NPS, SHPOs, CLGs.

Span of Reporting/Tracking: State and national totals.

Reporting Workload: No additional workload.

15. Number of Preserve America communities. (OUTPUT)

Significance of Measure: Designation as a Preserve America Community is another measure of local support for preservation.

Most Relevant To: ACHP, SHPOs.

Span of Reporting/Tracking: National totals.

Reporting Workload: No additional workload.

16. Number of presentations on tribal cultural heritage. (OUTPUT)

Significance of Measure: Presentations are the primary method of passing along information about cultural heritage that is important to tribes.

Most Relevant To: THPOs.

Span of Reporting/Tracking: By THPO and national totals.

Reporting Workload: Would require tracking and reporting by THPOs.

Comments: Although this measure does not assess how much information participants absorbed, it is much easier to track. The value participants draw from such presentations will be reflected in future attendance, which is influenced in part by word-of-mouth recommendations. Complements measure #17.

17. Number of individuals trained in traditional practices and languages. (OUTPUT)

Significance of Measure: Tracks the number of individuals trained in traditional practices and language that are important to tribes.

Most Relevant To: THPOs.

Span of Reporting/Tracking: By THPO and national totals.

Reporting Workload: Would require tracking and reporting by THPOs.

Comments: Complements measure #16.

ADDITIONAL STEPS RECOMMENDED

Measuring Performance for Section 106

Section 106 of the National Historic Preservation Act requires that federal agencies consult with SHPOs, THPOs, and tribal governments to ensure that historic preservation is taken into account with respect to federal undertakings that may affect historic properties. Currently, no GPRA or PART measures for either ACHP or NPS track the performance of the Section 106 process,

despite its importance to protecting historic properties and the significant share of staff resources that most SHPOs and THPOs devote to such compliance reviews. The Team therefore concluded that developing meaningful performance measures related to Section 106 would directly benefit the National Historic Preservation Program.

The nature of Section 106 reviews make performance measurement difficult. First, the law only mandates a *process* to ensure that due *consideration* is given to historic properties, rather than specifying desired outcomes for federal undertakings or historic resources. Second, ACHP oversees federal agencies' compliance with Section 106, while NPS provides HPF funds to SHPOs and THPOs to support their activities related to Section 106 reviews. Third, programmatic agreements between federal agencies and SHPOs and THPOs that exempt designated categories of routine projects with little potential impact on historic properties complicate the metrics of performance measurement by obviating the need for many Section 106 reviews.

ACHP lacks complete information about Section 106 reviews, since it only receives notification of the small fraction of federal undertakings that have been found to adversely affect historic properties. SHPOs and THPOs currently report to NPS the total number of Section 106 reviews conducted and the number of programmatic agreements signed, but these reports essentially only measure workload. In reality, the effectiveness of the Section 106 process rests largely on federal agencies' good-faith implementation in providing early notice to SHPOs and THPOs and meaningful opportunities for consultation. SHPOs and THPOs have consistently reported high variability in the attitude and approach of federal agencies to Section 106, even among field offices of the same agency. They also reported that a few federal agencies account for a disproportionate share of the problems.¹

The three measures below that the Team recommended for tracking performance related to Section 106 are intended to be considered together because no single measure can fully reflect performance:

6. Number of reported federal undertakings with a finding of no adverse effect on historic properties by agency.
7. Number of reported federal undertakings with a finding of adverse effect on historic properties by agency.
8. Number of Section 106 programmatic agreements in effect.

In the Team's view, these measures make the best use of available data. At the same time, the Team noted that the three measures above do not reflect important aspects of federal agencies' implementation of Section 106. Noting that ACHP currently has no performance measures related to Section 106 (or other functions), the Team recognized the importance of reporting and analyzing data *by federal agency* on an agency-by-agency basis. The Team urges ACHP to develop performance measures that track federal agencies' performance on Section 106 on an

¹ Back to the Future: A Review of the National Historic Preservation Program, National Academy of Public Administration, Washington, DC, 2007.

agency-by-agency basis. This will require collecting additional data to determine the universe of federal agency undertakings that are subject to Section 106.

Addressing Special Challenges Facing THPOs

To the extent possible, the Team tried to develop performance measures that apply to both SHPOs and THPOs. However, this goal is frustrated by the significant differences between state and tribal historic preservation programs that exist at many levels. Appendix G provides additional examples and a more detailed discussion.

First, tribes' underlying historic and cultural resources differ markedly from most states' historic resources. For example, tribes typically have far fewer historic buildings than states but far more naturally occurring historic properties, based on their long occupation in North America. Tribes also have responsibility for ancestral homelands, which often involve multiple states, responsibilities related to the Native American Graves Protection and Repatriation Act (NAGPRA), and a much broader diversity of cultural resources, including: cultural sites, sacred places, native cultures and practices, and oral history. Different languages require translation from English to Native American languages. Despite these significant differences, the performance measures that currently apply to THPOs were drawn from the measures developed for SHPOs.

Second, the Team notes that tribes' historic preservation program activities differ from states' because tribal governments have the option as to which activities they assume under the NHPA, whereas all of the core activities are required of the states. For example, tribes have never used the federal historic preservation income tax credit program, primarily due to economic factors. Typically, THPOs assume responsibility for Section 106 within the boundaries of tribal lands. In addition, federal agencies are required to consult with tribes on undertakings that may affect historic properties on ancestral homelands to which any Indian tribe attaches religious or cultural significance. As a result, Section 106 reviews account for a greater proportion of most THPOs' workload than is the case for most SHPOs.

Third, while SHPOs are under-funded, in the Team's view, THPOs are *sorely* under-funded. The average THPO grant in FY2008 was \$75,200, which is barely enough to cover basic office expenses and the salary of a single employee.² Indeed, some tribal historic preservation officers are forced to work less than five days a week due to funding constraints. In many years, the overall funding for tribal grants has not kept pace with the designation of additional THPOs, which further exacerbates the funding shortfall.

Finally, the capacity of most THPO programs is severely limited in comparison to SHPOs. While SHPOs have been able to build their capacity with the help of federal HPF grants over the past 35 years, the THPO grants program is new and has provided much smaller grants. In addition, NPS programmatic support, such as training for THPOs, has not kept pace with the growth of the THPO program. This has further hindered professional development and capacity building for most THPOs.

² In comparison, the average SHPO grant was \$667,400 in FY2008.

Several THPOs expressed concern that performance measures not be used to penalize them for their limited capacity, making a strong case that the primary problem presently facing THPOs is lack of adequate funding. The Team cautions NPS, DOI, OMB and other organizations that use performance measures not to apply these measures unfairly to tribes.

Since NPS first began awarding HPF formula grants to THPOs a little more than a decade ago, no evaluation of the tribal grants program has been conducted. The Team recommends that NPS conduct an in depth, overall evaluation of this program, taking into account THPOs' workload and capacity, the adequacy of federal funds, other sources of funding for historic preservation, and performance. This evaluation should actively engage tribes to explore those factors that distinguish tribal programs from most state programs, major THPO priorities and activities, and performance measures that meaningfully capture the unique aspects of tribal historic preservation activities.

Developing a Meaningful Efficiency Measure

The Team was unable to develop a measure that meets the traditional test of an efficiency measure, i.e., one that measures monetary savings or time saved in a way that relates directly to monetary savings. The Team viewed the "Number of Section 106 programmatic agreements that effect" as a "common sense" efficiency measure, because the actual experiences of SHPOs across the country has confirmed that well designed programmatic agreements result in real and significant savings in time and money and allow scarce resources to be devoted to more significant preservation activities. However, the Team recognizes that tracking increases in the number of programmatic agreements does not meet OMB's test as an efficiency measure.

The Team therefore recommends that NPS, in consultation with ACHP, undertake a study based on the experience of a sample of SHPOs to develop an estimate of the costs avoided by programmatic agreements. By developing a standard that estimates the savings associated with programmatic agreements based on the number of Section 106 reviews avoided, NPS would make possible the calculation of a meaningful efficiency measure for SHPOs and THPOs as well as federal agencies and ACHP.

APPENDIX A

**MEMBERS OF THE HISTORIC PRESERVATION
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APPENDIX B

**ACADEMY STAFF, ADVISORS, AND RESOURCE PERSONS WHO
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APPENDIX C

BACKGROUND PAPER ON PERFORMANCE MEASUREMENT

October 9, 2008

Prepared by Academy Staff for the Historic Preservation Performance Measures Team**I. The Opportunity at Hand**

The Program Assessment Rating Tool (PART) was first released for use in July 2002 following a special NAPA workshop and Congressional hearing. It has since been the Executive Branch's primary tool for measuring the performance of federal programs. As of September 2007, more than 1,000 federal programs accounting for 98 percent of the budget (or \$2.6 trillion in federal spending) have been measured using PART.

While PART may not be the centerpiece of performance measurement in the next Administration, measurement of program performance in one form or another will likely continue. Both Presidential campaigns have emphasized the need for performance measurement and committed to scrutinizing all federal programs. In addition, growing federal budget pressures will likely intensify competition among programs, increasing the importance of demonstrating results in order to justify the allocation of scarce resources. It is also important to note that the OMB PART database includes a treasure trove of information on program measures and assessments to date, open to, and accessible by, the public.

The Historic Preservation Performance Measures Team (Team) has a rare opportunity to get out ahead of the curve in developing more meaningful performance measures that can be used a federal, state, tribal, and local levels. Rather than reacting to measures handed down from on high, the Team—composed of historic preservation experts, and supported by practitioners and persons familiar with performance measures—has the chance to develop measures that reflect what is truly important about federal, state, tribal, and local preservation programs.

The Team should not feel constrained by the boundaries of PART or focus exclusively on the kinds of measures OMB values. Instead, the Team should seize the opportunity to put the historic preservation movement's "best foot forward" by developing a range of performance measures that will have utility for multiple purposes and resonate with different audiences

II. Purposes of the National Historic Preservation Act

The purposes of a program provide a useful starting point in developing performance measures. The preface of the National Historic Preservation Act cites the following purposes:

A. That the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people;

B. That increased knowledge of our historic resources, establishment of better means of identifying and administering them, and the encouragement of their preservation will improve the planning and execution of Federal and federally assisted projects and will assist economic growth and development; and

C. That it is necessary and appropriate for the Federal Government to give maximum encouragement to agencies and individuals undertaking preservation by private means, and to assist State and local governments and the National Trust for Historic Preservation to expand and accelerate their historic preservation programs and activities.

III. Purposes and Audiences of Performance Measurement

Measuring performance should provide a program with information that allows it to improve its ability to deliver on its mission. Performance measures are data points that give program managers and agency directors key information about the functioning of the program or agency. Therefore, performance measures can be developed to collect a variety of information useful to various audiences and to inform decision-making. The Team will have to decide what the purposes of historic preservation measures are, and what audiences they should serve. The following provides examples of purposes and audiences.

A. Performance measures can serve multiple **purposes**. They can:

1. align activities towards a common goal
2. demonstrate and clearly communicate a program’s efficiency, effectiveness, and impact
3. increase the understanding of, and support for, a program
4. help justify budget requests
5. help program managers improve program design and operations
6. improve accountability and coordination among cooperating organizations

The list of purposes above is not exhaustive. As the Team develops more meaningful measures, we need to recognize that each purpose will not have equal value to every audience—and that some purposes may deserve higher priority.

B. The **audiences** for historic preservation performance measures span a broad spectrum:

- National Park Service
- Advisory Council on Historic Preservation
- Federal executive agencies with historic assets and/or involved in Section 106 of the National Historic Preservation Act review
- Office of Management and Budget
- Congress, especially the Committees on Appropriations
- SHPOs

- THPOs
- CLGs
- State, tribal, and local executive agencies
- State, tribal, and local legislatures and councils
- Preservation commissions, advocacy organizations, and private foundations
- The public in general and others.

No single set of performance measures will be applicable or important to all audiences. Therefore the Team may want to develop a range of performance measures that will serve different purposes for different audiences.

IV. Basic Concepts and Terminology of Performance Measurement

To avoid confusion, the Academy suggests that we all rely on a common vocabulary over the course of this project. Working definitions of key terms are provided below based on the basic terminology for performance measurement that federal agencies use for PART and the Government Performance and Results Act (GPRA).

Baseline is the starting point from which gains are measured and targets are set. The baseline shows actual program performance or prior condition for the given measure in a specified prior year or average of several years.

Targets refer to improved levels of performance (above the baseline) needed to achieve stated goals. Targets should be both *ambitious* (i.e., set at a level that promotes continued improvement given program circumstances) and *achievable* given program characteristics. Each target must have a timeframe (e.g., years in which the target level is to be achieved). Target setting should consider circumstances (e.g., funding levels, changing legislative constraints, past performance, and other external and internal factors), and targets may be adjusted as these factors change.

Annual performance indicators are the measures and targets affected by an activity in a particular (generally near-term) year. Annual performance indicators should support long-term indicators to link their contribution to long-term planning.

Long-term is defined as covering a multi-year period of time. The duration selected is often consistent with the periods for strategic goals used in the Agency Strategic Plan, although OMB requires long-term targets to be updated annually. Long-term performance indicators should be supported by annual performance indicators to be able to gauge annual progress toward their achievement.

Long-term and annual performance goals should generally inter-relate, so that annual measures and targets are indicators of progress towards a program's long-term goals. Indeed, a long-term performance goal could be an annual performance goal in the future. For example, a long-term performance goal could reflect the cumulative effect of annual activities on increasing the quantity and quality of preserved historic properties. This type of goal can indicate program success in accomplishing its mission. In addition, programs should have efficiency goals. For

example, a program might have a goal of handling 15 million transactions in 2011 for the same cost as handling 10 million transactions in 2006.

Impact Outcome measures the direct or indirect effects or consequences resulting from achieving program goals compared to what would have occurred without the program. In most cases, impact outcome indicators are the most difficult to measure.

Outcome Measures describe the effect of carrying out a program or activity. They define an event or condition that is external to the program or activity and that is of direct importance to the intended beneficiaries and/or the general public. For example, one outcome measure of a program aimed to prevent the acquisition and transmission of HIV infection is the number (reduction) of new HIV infections in the U.S. Outcomes should relate to the mission of the program through Strategic Goals and Long-Term Objectives, and be supported by one or more outputs.

Output Measures Outputs describe the production of goods and services over time. For example, the percentage of warnings each year that are issued more than 20 minutes before a tornado forms is an output measure.

Outputs v. Outcomes While performance measures must distinguish between outcomes and outputs, there needs to be a reasonable connection between them, with outputs supporting (i.e., leading to) outcomes in a logical fashion. Outputs should contribute to outcomes, and outcomes should be supported by outputs. One outcome may be supported by more than one output, and one output may support more than one outcome. Outcome measures are the most informative, because they reflect the ultimate result of the program to its beneficiaries. Outputs are easier to connect to budget requests and use to calculate costs and develop budgets. The table below provides some examples:

Outputs	Outcomes	Impact Outcomes
Number of housing units rehabilitated	Increases in the property value of houses rehabilitated for low-income families as a result of targeted assistance.	Reduction in neighborhood blight
Number of businesses assisted through loans and training	Percent of businesses that remain viable 3 years after assistance.	Percent of businesses that remain viable 3 years after assistance compared to similar businesses that received no assistance
Number of people served by municipal drinking water systems	Increased percent of people with access to clean drinking water.	Reduced health effects from contaminants in drinking water
Number of acres of agricultural lands with conservation plans	Percent improvement in soil quality; Dollars saved in flood mitigation.	

Input measures are what an agency or manager has available to carry out the program or activity, such as employees (FTE), funding, equipment or facilities, supplies on hand, goods or services received, work processes or rules. When calculating efficiency, input is calculated based on the amount of resources used.

Workload is the amount of work assigned to or expected from an agency, program, or worker in a specified time period, such as the number of Section 106 reviews per year.

Effectiveness relates to accomplishing the intended or expected result. Effectiveness measures focus on impact, customer satisfaction, and quality of output and outcomes.

Efficiency relates to performing or functioning in the best possible manner with the least waste of time and effort. Efficiency measures relate to satisfactory and economical use of resources in relation to achieving quantitative outputs and outcomes. The best efficiency measures capture improvements in program *outcomes* for a given level of resource use. If expressing efficiency measures in terms of outcomes is difficult, then an efficiency measure may focus on reducing the resources to produce *outputs*.

V. Characteristics of Effective Performance Measures

The Team may want to establish a common set of criteria for developing performance measures. The list below highlights general characteristics for performance measures to assist in evaluating the relative merits of alternatives identified. Performance measures should:

- A. relate directly to the mission;
- B. document changes resulting from program activities or strategies (a causal relationship);
- C. show progress on near-term milestones (towards a longer-term goal);
- D. rely on available, reliable and timely data (in some cases being necessary to use intermediate outcomes because of data lag);
- E. result in the least burdensome methods of data collection and reporting;
- F. are simple, easy-to-understand, and have public relations value; and
- G. focus on *outcomes*, to the extent possible, supported by workload, inputs, or outputs.

VI. Existing Sources of Information for Historic Preservation Measures

There are a number of sources of information that support the current Historic Preservation Program measures. These existing sources could be used to modify existing measures, or to support new measures. The Team should rely on existing sources of information to the maximum extent possible to help to reduce data collection and reporting workload, and to speed adoption and acceptance of modified or new measures.

The following sources of information support existing performance measures for historic preservation.

A. End-of-Year Reports that SHPOs and THPOs submit to NPS by December 31 each year.

- SHPOs report programmatic data in the Cumulative Products Table (see Tab I)
- THPOs report programmatic data in the Grant Products Summary (see TAB J)

B. Programmatic data that NPS collects and accesses centrally, for which SHPOs and THPOs are not required to separately report. Examples include:

- National Register listings.
- National Historic Landmarks designations.
- NPS database of Historic Preservation Income Tax Credit projects (see data included in the attached annual report for the Tax Credit program).

C. Data available in other federal programs and databases, including:

- Historic American Building Survey.
- Historic American Engineering Record.
- Surplus federal property records, such those concerning lighthouses.

D. Data reported to NPS by entities that do not receive funding, such as the number of historic properties protected (e.g., by Certified Local Governments, of which only about 40% currently report such data to NPS).

At the same time, the Team should not limit consideration of improved performance measures to the data sources listed above. Other existing sources of data may be useful, such as other data that SHPOs and THPOs already collect and data from other sources, such as federal, regional, state, tribal, and local economic development databases. In addition, the Team should consider what additional high-value information could be collected and reported by SHPOs and THPOs or at relatively modest cost and burden?

VII. Currently Performance Measures for Historic Preservation Programs

A. Current PART Measures

Outcomes

- Number historic properties newly designated as National Historic Landmarks.
- Percent designated National Historic Landmarks in good condition.
- Number significant historic and archeological properties listed in the National Register.
- Percent historic properties eligible for the National Register protected by federal historic preservation programs.

Outputs

- Number significant historic and archeological properties inventoried, evaluated, and officially designated by states, tribes, and CLGs.

Efficiency Measure

- Cost giving historic property a new designation or other level of protection.

B. Canadian Historic Preservation Performance Measures

The Government of Canada launched its Historic Places Initiative (HPI) in 2001 as part of an investment of more than \$500 million aimed at ensuring the growth and development of Canadian arts and culture. Of this \$500 million, \$24 million was designated over three years for HPI. HPI's objective was to "improve the state of conservation in Canada and increase Canadians' access to, and understanding of, their heritage by actively engaging them in its preservation."

It was agreed at the outset that HPI should be a collaborative arrangement in which each of the participating jurisdictions (Parks Canada, Canadian Heritage, the provinces and territories, aboriginal groups, and local governments) shared responsibility for results; that a clear reporting framework was essential to communicating results of joint work; and that clear measures be established to report on progress towards immediate, intermediate, and strategic outcomes to provide a foundation for evaluation.

HPI agreed at the end on three "ultimate outcomes," three "intermediate outcomes," three "immediate outcomes," and four outputs. These are:

Ultimate Outcomes

- Canadians feel a greater sense of connection to each other, their history, identity, and symbols. Performance indicator: increase in public awareness (evaluation and periodic surveys).
- More historic places are conserved and given a function in the life of communities. Performance indicators: increase in life or change in usage of historic places; and reduction in demolition of heritage buildings (evaluation).
- Historic places reflect the diversity of Canadian heritage with improved access to significant diverse cultural heritage. Performance indicator: number and type of historic places on the National Register (monitoring).

Intermediate Outcomes

- Canadians recognize the value of historic places and are engaged in their conservation. Performance indicators: increase in public awareness of importance of conservation and significance of historic places (through evaluation and periodic surveys); increase in activity of key stakeholders (through monitoring).
- Active involvement by partners in establishing and maintaining base infrastructure of Canadian Register, standards and guidelines, and certification process. Performance indicators: number and type of agreements between provinces, territories, and

municipalities (monitoring); number and type of outreach activities (monitoring); and number and type of complementary actions (monitoring).

- New tools providing opportunities to improve/maintain Canadian awareness of historic places and engagement in conservation. Performance indicators: hits on web site (monitoring, evaluation, survey); number of inquiries about HPI tools (monitoring); number of inquiries about federal, provincial, territorial, and municipal grant programs (monitoring); and increased public awareness of historic places (monitoring).

Immediate Outcomes

- Partner organizations support HPI tools to engage Canadians in conservation historic places. Performance indicator: support delivery partners (evaluation).
- Introduction federal financial incentives. Performance indicators: number applications to Commercial Heritage Properties Incentive Fund (monitoring); and number inquiries and applications to provincial, territorial and municipal grant programs (monitoring).
- Heritage stakeholders engage in terms of interest and involvement in the use of HPI tools. Performance indicators: number and type of interest (monitoring); number nominations to Register (monitoring); number requests for Standards and Guidelines (monitoring); and number inquiries for HPI tools (monitoring).

Outputs

- Design and development of the Canadian Register. Performance indicator: Number and type historic places nominated, designated, and listed (monitoring).
- Design and development of the Canadian Conservation Standards and Guidelines. Performance indicators: distribution and use of S&Gs (monitoring and evaluation); number and type of outreach activities (monitoring and evaluation).
- Design and development of the HPI Contributions Program. Performance indicator: number and types of partners at all government levels (monitoring and evaluation).
- Design and development of certification process in anticipation of federal financial incentives. Performance indicators: assessment of training (monitoring and evaluation); number projects certified and not certified (monitoring and evaluation).

VIII. Insights into Performance Measures from Comparable Programs

The Academy team, with help from Carmen-Rosa Torres, has reviewed performance measures for about a dozen federal programs. Because of Team members' expressed interest in the measures developed for the Community Development Block Grant program, we have included the current measures for CDBG. We have not included lists of measures for other programs because of the great number of measures and their narrow relevance to the programs in question. Instead, we have examined the performance measures for these other programs to identify characteristics that may have relevance to the task at hand and to highlight specific examples that may spark ideas about corollary measures for preservation.

- A. Incremental vs. cumulative—Some measures track annual progress while others track cumulative results over time. For example:
- Number of new households receiving low-income housing assistance vs. total number of households receiving low-income housing assistance
 - Number of new chemicals listed vs. total number of toxicity profiles completed.
- B. Narrow vs. broad—Some measures are tied to specific elements or components of a program, while others measure the net effect of an entire program. In the case of highway safety, for example, the federal agency measures narrow outcomes, such as the percent of automobile occupants wearing a seatbelt, as well as broader outcomes, such as the fatality rate per million vehicle miles traveled. In the case of historic preservation, the Team could consider measures for some or all of the nine program areas as well as broader measures of outcome impact of all preservation efforts:
1. Historic Preservation Planning
 2. Survey and Inventory
 3. National Register
 4. Review and Compliance
 5. Preservation Tax Incentives
 6. Development, Acquisition and Covenants
 7. Local Government Certification
 8. Other—education, outreach, and publications
 9. Administration
- C. Absolute numbers vs. ratios—Some measures are based on absolute numbers of things accomplished. Other measures use a ratio to normalize important differences, such as between large and small states. When using ratios, it generally is useful to pair them with absolute numbers, such as:
- number of acres treated for invasive species and the percent of area treated for invasive species
 - number of vehicle crash fatalities and the fatality rate per million vehicle miles traveled
- D. Efficiency measures—Timeliness measures, such as the average number of days required for processing an application, are generally not acceptable as efficiency measures. The amount of time required for a program to process something can only serve as an acceptable efficiency measure if there is a clear explanation that details how that time saving also required fewer resources to be used. Efficiency measures demonstrate improved economy in the acquisition and utilization of resources. In this sense, a program-wide labor productivity measure or program-wide labor costs (including contractor costs) might be used to indicate decreased processing costs associated with improving processing timeliness.

Efficiency measures are usually expressed in terms of costs, as illustrated by the following examples:

- cost per 1,000 sterile moths produced for the cotton program
 - cost per multi-family rehabilitated low-income housing unit will remain consistent adjusted for inflation
- E. Reflecting program priorities in performance measures—The Indian Health Service Sanitation Facilities Construction Program measures the effectiveness of the program by how well it meets highest priority needs: *Percent of existing homes served by the Sanitation Facilities Construction Program at Deficiency Level 4 or above as defined by 25 USC 1632. Deficiency level 4 and 5 homes have the greatest deficiencies.* “
- F. Moving beyond outputs to outcomes—The CDBG program found a useful way to move beyond the number of affordable housing units produced (an output measure) to an outcome measure by calculating the number of “unit years” of affordable housing, i.e., the number of future years that low-income families would be assured access to the housing units produced. There may be a corollary with historic preservation in terms of the number of years for which maintenance of historic properties is assured. For example, Save America’s Treasures includes requirements for continued maintenance for at least 50 years, while tax credit projects require guarantees of maintenance for at least five years.

APPENDIX D

**ORIGINS OF THE NATIONAL HISTORIC PRESERVATION PROGRAM
AND ITS MAJOR ELEMENTS**

Compiled by Antoinette J. Lee, September 24, 2008

Passed by the United States Congress and signed into law by President Lyndon B. Johnson in 1966, the National Historic Preservation Act is one of a group of laws that addressed the environmental challenges of the 1960s. This act resulted from recognition that the existing preservation mechanisms and tools at the Federal, state, and local levels and in the private sector were inadequate to address the many historic properties that were disappearing because of urban renewal, highway construction, and other major public works projects as well as private sector development. Amendments in 1980 and 1992 expanded the participation of local governments and tribes in the national historic preservation program.

The purposes of the National Historic Preservation Act are best captured in its preamble, which lays out the justifications for a larger role for the Federal government in historic preservation. These justifications are still vital and relevant today. They include the over-arching statements, such as “the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people.” The preamble also states that “increased knowledge of our historic resources, establishment of better means of identifying and administering them, and the encouragement of their preservation will improve the planning and execution of Federal and federally-assisted projects and will assist economic growth and development” and that “it is necessary and appropriate for the Federal Government to give maximum encouragement to agencies and individuals undertaking preservation by private means, and to assist States and local governments and the National Trust for Historic Preservation in the United States to expand their historic preservation programs and activities.”

The purposes contained in the National Historic Preservation Act of 1966, and its amendments, have resulted in: 1) expansion of the National Register of Historic Places to include properties of state and local, as well as national, significance; 2) State Historic Preservation Programs that direct and conduct comprehensive statewide surveys and maintain inventories of historic properties; identify and nominate eligible properties to the National Register; prepare and implement a comprehensive statewide historic preservation plan; administer a State program of Federal assistance of historic preservation; advise and assist Federal and state agencies and local governments in carrying out their historic preservation responsibilities; cooperate in ensuring that historic properties are taken into consideration at all levels of planning and development; provide public information, education, training, and technical assistance in historic preservation; cooperate with local governments in the development of local historic preservation programs and assist local government certification; and consult with Federal agencies on undertakings that may affect historic properties and the content and sufficiency of any plans developed to protect, manage, or reduce or mitigate harm to such properties; 3) tribal historic preservation programs to preserve their historic properties; 4) grants to States and tribes to these ends; 5) review of Federal

or federally-assisted undertakings to take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register (Section 106); 6) establishment of the Historic Preservation Fund funded through Outer Continental Shelf Act revenues; 7) Federal agency conservation programs with respect to historic properties owned or controlled by the agency; and 8) the Advisory Council on Historic Preservation to advise the Congress and President on historic preservation matters and review Federal agency policies and programs to improve the effectiveness, coordination, and consistency of those policies and programs with the policies and programs carried out under the Act.

In addition, the Historic Rehabilitation Tax Incentives, first enacted in 1976, encourage historic preservation through rewarding private investment in rehabilitating historic properties. The National Park Service administers the program in partnership with the Internal Revenue Service and State Historic Preservation Offices through certifications of eligible properties. The tax incentives have been instrumental in preserving the historic places that give cities, towns, and rural areas their special character; attract new private investment to the historic cores of cities and towns; generate jobs, enhance property values, and augment revenues for State and local governments through increased property, business, and income taxes; and help create moderate and low-income housing in historic buildings.

In 2008, as part of an effort to develop more meaningful performance measures for the National Park Service and the Advisory Council on Historic Preservation, along with its partners in the State Historic Preservation Offices and the Tribal Historic Preservation Offices, this document was prepared to highlight the origins of the national historic preservation program, its legislated provisions (elements), and their purposes.

This document presents “word-for-word” extracts from key publications of the 1960s and early 1970s, as well as the preamble to the National Historic Preservation Act, and the history of the national historic preservation program prepared by James A. Glass. These documents constitute the standard references for understanding the historic preservation field during this period.

References Cited

- *Historic Preservation Today: Essays Presented to the Seminar on Preservation and Restoration*, Williamsburg, Virginia, September 8-11, 1963. (**HPToday**) This publication resulted from a 3-day meeting in September 1963 in Williamsburg, Virginia, of 160 individuals active in American historic preservation to review the history of American preservation, analyze its philosophical basis, examine its present effectiveness, and discuss ideal ways to shape its future.
- *Historic Preservation Tomorrow: Revised Principles and Guidelines for Historic Preservation in the United States*, Second Workshop, Williamsburg, Virginia, 1967. (**HPTomorrow**) This publication resulted from the March 3-5, 1967 conference in Williamsburg, Virginia, to review the work of the 1963 Seminar and prepare drafts on 1) objectives and scope of the preservation movement; 2) survey, evaluation, and registration; and 3) planning for preservation.

- National Historic Preservation Act, as amended (**NHPA**). This document provides compelling justifications for the national historic preservation program, particularly in its preamble.
- Legislative History of Historic Preservation Act of 1966 by James M. Lambe, December 1967. (**Lambe**) This photocopy document includes summaries of legislative activity that led to passage of the National Historic Preservation Act.
- *With Heritage So Rich: Special Committee on Historic Preservation, United States Conference of Mayors*, Washington, DC: The Preservation Press, 1983. (**WHSR**) This document is regarded as the definitive philosophical statement for the National Historic Preservation Act. Originally published in 1966, it was reprinted by the National Trust for Historic Preservation in 1983. *With Heritage So Rich* resulted from the interest of former Congressman Albert M. Rains in leading a special study of historic preservation, which was sponsored by the United States Conference of Mayors and underwritten by the Ford Foundation. The Conference's Special Committee on Historic Preservation is sometimes referred to as the "Rains Committee."
- How to Complete National Register Inventory-Nomination Forms, July 1972. (**HCNRF**) This early document describes the purposes of the National Register of Historic Places.
- The Beginnings of a New National Historic Preservation Program, 1957 to 1969, by James A. Glass, Nashville, Tennessee: American Association for State and Local History, 1990. (**Glass**) Jim Glass's history of the national historic preservation program provides the only published history of the activities that led up to passage of the National Historic Preservation Act in 1966 as well as developments to implement the act after its passage.

What is the purpose of a national historic preservation program?

Since World War II a great wave of urbanization has been sweeping across the nation. And such is the rate of growth that in the next 40 years the United States will have to build more homes, more schools, more store, more factories, more public facilities of all kinds than in the entire previous history of the country. Out of the turbulence of building, tearing down and rebuilding the face of America, more and more Americans have come to realize that as the future replaces the past, it destroys much of the physical evidence of the past. The current pace of preservation effort is not enough. It is as though the preservation movement were trying to travel up a down escalator. The time has come for bold, new measures and a national plan of action to insure that we, our children, and future generations may have a genuine opportunity to appreciate and to enjoy our rich heritage. (**WHSR**)

If the preservation movement is to be successful, it must go beyond saving bricks and mortar. It must go beyond saving occasional historic houses and opening museums. It must be more than a cult of antiquarians. It must do more than revere a few precious national shrines. It must attempt to give a sense of orientation to our society, using structures and objects of the past to establish

values of time and place. This means a reorientation of outlook and effort in several ways. **(WHSR)**

The new preservation must look beyond the individual building and individual landmark and concern itself with the historic and architecturally valued areas and districts which contain special meaning for the community. A historic neighborhood, a fine old street of houses, a village green, a colorful marketplace, a courthouse square, an esthetic quality of the townscape—all must fall within the concern of the preservation movement. It makes little sense to fight for the preservation of a historic house set between two service stations, and at the same time, to ignore an entire area of special charm or importance in the community which is being nibbled away by incompatible uses or slow decay. **(WHSR)**

In recent decades, however, new and complex problems have been recognized in communities throughout the nation which challenge afresh the resources and skills of preservationists. These problems stem in large part from such contemporary trends as urban expansion and decay, massive new highway and dam constructions, accelerated population growth, industrial and commercial expansion, and increasing leisure time. While it should be evident to every American that our communities and nation must continue to grow and develop, it is equally clear that we must also preserve our heritage of history and architecture if we are to keep our roots and retain what is unique and much of what is handsome in the character of our communities. These two objectives need not be incompatible if there is adequate research, planning and communication among those responsible and concerned. **(HPToday, 243)**

The spirit and direction of the Nation are founded upon and reflected in its historic heritage. **(NHPA)**

The historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people. **(NHPA)**

Historic properties significant to the Nation's heritage are being lost or substantially altered, often inadvertently, with increasing frequency. **(NHPA)**

The preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans. **(NHPA)**

In the face of ever-increasing extensions of urban centers, highways, and residential, commercial, and industrial developments, the present governmental and nongovernmental historic preservation programs and activities are inadequate to insure future generations a genuine opportunity to appreciate and enjoy the rich heritage of our Nation. **(NHPA)**

The increased knowledge of our historic resources, the establishment of better means of identifying and administering them, and the encouragement of their preservation will improve the planning and execution of Federal and federally assisted projects and will assist economic growth and development. **(NHPA)**

Although the major burdens of historic preservation have been borne and major efforts initiated by private agencies and individuals, and both should continue to play a vital role, it is nevertheless necessary and appropriate for the Federal Government to accelerate its historic preservation programs and activities, to give maximum encouragement to agencies and individuals undertaking preservation by private means, and to assist State and local governments and the National Trust for Historic Preservation in the United States to expand and accelerate their historic preservation programs and activities. (**NHPA**)

Preservation is now recognized as only part of a wider concern for the conservation of all natural and cultural resources, and for the enhancement of the total environment. A new generation of Americans have (sic) awakened to the importance of saving its heritage of history and architecture as an irreplaceable part of the living fabric of communities. (**HP Tomorrow**, 1)

Preservation of historic areas and architectural monuments is an essential element of all governmental planning for the maintenance and development of environmental values and for land and water use in the conservation of our cultural resources. Historic and architectural resources in urban areas are subject to extreme pressure from both public and private activity. For this reason, city, highway and renewal planning responsibilities for preservation require special emphasis in these areas. (**HP Tomorrow**, 16)

There are many buildings, groups of buildings and areas and sites in a community which, while not of outstanding or exhibition quality, and regardless of age, form an invaluable resource in providing scale, texture and continuity to the physical environment. It is a major concern of preservation that such buildings and sites be preserved and restored. These buildings are valuable assets in the economic and social life of a community. They provide varied housing and business accommodations, space for leisure-time opportunities, and contribute pride in a sense of continuity and belonging to its citizens. With the lapse of time, they will gain importance as examples of eras that may not be considered of great interest today. (**HP Tomorrow**, 20)

...the [federal government] should embrace a “new preservation” that could keep pace with the swift changes in American society. Such a policy should acknowledge the importance of architecture, design, and aesthetics and emphasize the conservation of areas and districts that contained special meaning for each community. (**Glass**, 12)

Although the Johnson administration, National Park Service, and Rains Committee were now agreed that there should be [preservation] legislation, each was pursuing a slightly different objective. The administration desired to encourage a popular activity through grants to the states. The Park Service wanted to enhance its position in the preservation movement through a grants-in-aid program. The Rains Committee was seeking primarily to curb destructive actions financed by federal agencies. During 1966, bills were introduced, modified, and combined, as each party strove to have its objective emphasized in the legislation and features amended that it did not favor. (**Glass**, 17)

Passage of the National Historic Preservation Act undoubtedly occurred in part because of its endorsement by President Johnson as part of his domestic legislative program. During the mid-

1960s, Congress adopted many presidential bills aimed at improving conditions in American society. The preservation bill also attracted Congressional support as a measure aimed at preserving the national heritage. The legislators were aware of increasing popular interest in conserving historic landmarks and of public disquiet over the damaging affects (sic) of federally financed construction activities. (**Glass**, 20)

What is the purpose of surveys of historic properties?

Because of our lack of thorough knowledge and lack of a national inventory it is impossible to document what has happened state by state. All we can do is to select or list at random examples which illustrate the kind of thing that has been happening and hope that these illustrations will be of sufficient and compelling interest to convince those interested in improving the national preservation to do something and do it quickly. (Carl Feiss in **WHSR**, 114)

Surveying is the essential first step without which historic preservation is impossible. Nothing can be preserved unless it is known to exist, nor can an adequate case be made for preservation. (**HPTomorrow**, 7)

The principal emphasis in the [Historic American Buildings] Survey is on intensive and detailed studies, through measured drawings, photo-data projects, inventories and publications, of historic buildings and structures that have been selected through preliminary inventories as being structures of special merit. It also attempts to record buildings threatened with demolition for a permanent historical record. (**HPTomorrow**, 14)

What is the purpose of the National Register of Historic Places?

A national plan of action for historic preservation should include the following elements: A greatly expanded National Register program to inventory and to catalogue communities, areas, structures, sites and objects. (**WHSR**)

Historic and architectural monuments worthy of preservation should be identified, classified, and registered before rather than after they are threatened with encroachment or destruction. Authoritative knowledge often enables a community, through foresight and planning, to avoid preservation problems before they occur rather than seek impractical last minute remedies, “putting out fires.” (**HPToday**, 248)

The National Park Service should be required to prepare a comprehensive inventory of the Nation’s historic sites and areas, and it should be completed within five years. (**Lambe**, 1)

The purposes of the National Register program are threefold: (1) to assess and record the history and achievements of the American people in the above named fields [American history, architecture, archeology and culture]; (2) to assist in the preservation of the tangible reminders of

these achievements and this history through the granting of Federal money to the states on a dollar-for-dollar matching basis; (3) and to extend to all such properties a degree of protection by insuring compliance with procedures for review of Federal undertakings. (**HCNRF**)

A national register is vital to the efficient and economical conduct of Federal aid programs for historic preservation. The register will be a comprehensive catalogue of historic properties worthy of preservation to serve as the basic framework within which Federal, State, urban and nonurban needs and responsibilities may be defined. (**Lambe, 52**)

The proposed legislation would supplement the Historic Sites, Buildings, and Antiquities Act of 1935 by extending the cataloguing responsibility of the Interior Department to all significant historic properties, not just those that meet the 1935 definition of national significance. (**Lambe, 72**)

The National Register...[serves] as an index to the most important districts, sites, buildings, structures, and objects described in state and local surveys and approved by the Secretary of the Interior.... The Register will become our national list of significant properties, comparable to lists kept by most European and many South American nations. It will provide an authoritative guide by which governmental bodies and private citizens may know which properties should be protected against destruction or impairment and which may be eligible for federal financial support. The National Register provides an incentive to all localities to identify their heritage and to record it in an orderly manner. Opportunities for safeguarding their heritage and means for supporting it will be provided by transmitting survey data through the state to the federal government. (**HPTomorrow, 7**)

The [Rains] committee advocated establishing a National Register of historic sites and structures, which would serve as a master list of all properties discovered through inventory and survey programs. (**Glass, 12**)

What is the purpose of Section 106 Compliance?

A national plan of action for historic preservation should include the following elements: the establishment of an Advisory Council on Historic Preservation to provide leadership and guidance for the direction of inter-agency actions and to provide liaison with state and local governments, public and private groups and the general public. (**WHSR**)

Make mandatory a preliminary review of the location and status of historic sites and buildings in relevant areas prior to the undertaking of federal or federally-aided programs or projects affecting plans for physical development. Where the review produces evidence of the existence of historic sites and buildings and that surveys made in accordance with the standards of the National Registry are lacking, make mandatory a historic survey prepared in accordance with

such standards.... Plans prepared for such development projects must take all such historic surveys into consideration, and most show evidence thereof. (**WHSR**)

Machinery should be set up so that Federally financed building projects do not conflict with historic preservation. (**Lambe, 1**)

“...our concern would be that...there be some mechanism in Government to coordinate the preservation activities of the various interested and concerned departments such as Interior, HLEW, Commerce, and by that I mean the Bureau of Public Roads; GSA, which owns and administers historic Federal buildings, and sometimes tears them down. They are threatening now one building in St. Louis, the Old Post Office, which was designed by the same man who designed the State, War, and Navy Building...We feel that there is a lack of coordination within the Federal Government itself, and we would hope that there would be...an advisory council which would promote the cause of historic preservation among Federal agencies, would coordinate their activities, and would be in a position to advise the Congress and the President on matters of historic preservation....” (Gordon Gray in **Lambe, 83-84**)

“...the committee recommended that before a Federal agency expends funds for physical improvement, whether it be urban renewal or GSA, or public roads, there must be some survey to make sure there isn't a historic site which is threatened or destroyed in this activity...” (Gordon Gray in **Lambe, 85**)

As a result of the continuing outcry over federally financed destruction of historic properties, represented in the deliberations of the Rains Committee by [Gordon] Gray and [Robert] Garvey of the National Trust, the panel recommended several actions. A national preservation policy board, the Advisory Council on Historic Preservation, should be created and include representatives of federal agencies, state and local governments, and private preservation and urban development organizations. The council would draw up policies and guidelines for resolving preservation conflicts involving federal projects and advise the President Congress on preservation matters. To afford additional protection for historic properties, the Rains Committee urged that federal agencies be required to ascertain the location and status of such sites and structures before proceeding with or approving development projects. (**Glass, 12**)

What is the purpose of the Historic Rehabilitation Tax Credits?

If the effort to preserve historic and architecturally significant areas as well as individual building is to succeed, intensive thought and study must be given to economic conditions and tax policies which will affect our efforts to preserve such areas as living parts of the community. (**WHSR**)

Provide by Internal Revenue Code amendment or clarify by regulation or published ruling the status of income tax deductibility to private owner of registered historic properties for preservation and restoration expenditures within appropriate limitations. (**WHSR**)

The owner of any site or area included in the inventory should be entitled to deduct from the Federal Income Tax any expenses necessary for historic preservation. (**Lambe, 1**)

What is the purpose of the Historic Preservation Fund?

A national plan of action for historic preservation should include the following elements: a federal program of assistance to states and localities for companion programs. (**WHSR**)

Federal loans and matching grants should be used by State and local governments for the historic preservation task. (**Lambe**, 1)

...the main interest of the administration and the Department of Interior lay in stimulating preservation through grants-in-aid. (**Glass**, 17)

APPENDIX E

**DRAFT MISSION STATEMENT FOR THE
NATIONAL HISTORIC PRESERVATION PROGRAM**

To preserve through partnerships the historical and cultural foundations of the Nation for the inspiration and benefit of present and future generations, by identifying historic resources, advocating for their preservation and protection, and developing and administering incentives for their continued use and beneficial impact on the economic growth and development of the community.

APPENDIX F

COMPREHENSIVE LIST OF PERFORMANCE MEASURES CONSIDERED

Over the course of the project the Historic Preservation Performance Measures Team identified and considered more than 60 performance measures, which are listed below as background. The 17 measures ultimately selected were developed from this larger group of measures. (The numbers below do not correspond to the 17 measures recommended by the Team.)

Preserve and Protect Historic Properties and Places

1. Percent of designated National Historic Landmarks in Good Condition (existing PART measured). **Recommended by the Team.**
2. Number of years maintenance assured for historic properties. **Dropped from consideration due to onerous reporting burden. Covered by recommended measure #4.**
3. Due consideration of the impacts of federal actions that could affect historic resources (Section 106). **Dropped from consideration as overly vague.**
4. Percent of historic sites adversely affected by federal actions (Section 106). **Recommended by the Team.**
5. Percent of land area (or potentially significant land area) or increase in the percent surveyed. **Dropped from consideration because focus on total land area might discourage targeting resources to most significant areas and due to complications related to “re-surveys.”**
6. Percent of the estimated total of historic properties inventoried. **Dropped from consideration due to the difficulty in estimating the denominator.**
7. Percent of historic properties for which information is widely available. **Revisions to this measure reflected in recommended measure #12.**
8. Percent of programmatic agreements that are signed by the SHPO, THPO, and ACHP. **Revisions to this measure reflected in recommended measure #8.**
9. Percent of federal agency undertakings with a finding of no adverse effects to historic properties in which the SHPO/THPO concurred. **Revisions to this measure reflected in recommended measure #6.**
10. Percent of federal actions with adverse effects on historic properties for which federal agencies notify the SHPO, THPO (if applicable), and ACHP in a timely manner. **Dropped from consideration because of the difficulty and in defining and consistently applying “timely manner.”**

11. Net increase in the number of National Register listings. **Revisions to this measure reflected in recommended measure #3.**
12. Percent of properties listed on the National Register in good condition. **Dropped from consideration due to the infeasibility of assessing properties condition—and the cost of even a sample survey.**
13. Number of National Register properties not threatened or destroyed. **Dropped from consideration due to infeasibility of implementation.**
14. Number of Section 106 memoranda of agreement. **Dropped from consideration because the value of the results were considered unclear.**
15. Number of Section 106 programmatic agreements. **Recommended by the Team.**
16. Percent of time that SHPOs and THPOs (and tribes, in cases in which no THPO exists) are consulted simultaneously. **Dropped from consideration because of infeasibility of implementation.**
17. Number of newly recorded historic preservation easements or covenants. **Dropped from consideration because the number of properties affected is low and not necessarily representative.**
18. Number of properties protected. **Recommended by the Team.**
19. Number of historic properties newly designated as National Historic Landmarks (existing PART measure). **Dropped from consideration because the number is relatively small and because the percent of NHLs in good condition was judged more important.**
20. Number of significant historic and archeological properties listed in the National Register (existing PART measure). **Recommended by the Team.**
21. Percent of historic properties eligible for the National Register protected by federal historic preservation programs (existing PART measure). **Dropped from consideration because the important elements of this measure were captured by recommended measure #4. In addition, the Team believed that *the number* of properties protected was a better, more-explainable measure than using *the percentage* of National Register eligible properties. The percentage of the existing PART measure was always low—as it should be because most historic preservation work is done without governmental assistance. Also, the numerator for the PART measure (the number of in place protections) tended to be level, while the denominator (the number of recognized National Register eligible properties) tends to increase over time. This means that, over time, a level federal commitment to protect historic properties results in a decreasing percentage of properties protected through federal efforts.**
22. Number of properties inventoried and evaluated. **Recommended by the Team.**

23. Percent of reported federal agency undertakings that have adverse effects on historic properties that are successfully mitigated. **Dropped from consideration because this measure is nearly 100%.**

24. Number of newly executed Section 106 programmatic agreements signed by SHPOs. **Dropped from consideration in favor of the total number of programmatic agreements in effect, which will of necessity include the number of newly executed programmatic agreements.**

25. Number of newly executed Section 106 programmatic agreements signed by THPOs. **Dropped from consideration in favor of the total number of programmatic agreements in effect, which will of necessity include the number of newly executed programmatic agreements.**

26. Number of properties given historic designation by states, tribes, and CLGs. **Recommended by the Team.**

27. Number of reported federal agency undertakings with a finding of no adverse effects on historic properties. **Recommended by the Team.**

28. Number of reported federal agency undertakings with a finding of adverse effects on historic properties. **Recommended by the Team.**

Education, Awareness, and Inspiration

31. Public understanding of nearby historic places (based on a survey). **Dropped from consideration because of vagueness.**

32. Sense of pride in place. **Dropped from consideration because of vagueness.**

33. Widely held preservation ethic. **Dropped from consideration because of vagueness.**

34. Practice of cultural heritage. **Addressed through recommended measures # 16 and 17.**

35. Civic engagement in preservation. **Dropped from consideration because of vagueness.**

36. Number of visitors to historic properties and places. **Dropped from consideration because of difficulty in securing reliable and consistent reports and the fact that many historic properties are not open to visitors.**

37. Number of visits to a specific set of historic websites. **Recommended by the Team.**

38. Increased knowledge of historic properties (based on a survey). **Dropped from consideration because the cost of a survey was judged unjustified based on the vagueness of the measure.**

39. Number of people claiming historic tax credits. **Dropped from consideration in favor of private capital leveraged by tax credits, which was judged more important.**
40. Percent of economic development plans with historic preservation as a goal. **Dropped from consideration because the difficulty in tracking and reporting outweighed the perceived utility of this measure.**
41. Number of members of historic preservation organizations. **Dropped from consideration because of the difficulty in reliably and consistently tracking and reporting membership data in hundreds of national, state, and local preservation organizations.**
42. Percent of historic properties for which information is widely accessible on the Internet. **Revised as recommended measure #12.**
43. Number of local historic preservation commissions. **Dropped from consideration in favor of the number of CLGs, which was judged more meaningful.**
44. Number of local historic preservation organizations. **Dropped from consideration due to the difficulty in tracking and reporting compared to the utility of the measure.**
45. Number of Certified Local Governments. **Recommended by the Team.**
46. Number of Preserve America Communities. **Recommended by the Team.**
47. Number of local preservation ordinances. **Dropped from consideration in favor of the number of CLGs, which was judged more meaningful for NPS and state programs as well as easier to track.**
48. Number of citizen nominations to the National Register. **Dropped from consideration because such a small percentage of National Register nominations come from the general public.**
49. Number of presentations about historic resources. **Revised as a measure related to tribal cultural heritage (recommended measure #16).**
50. Number of people attending presentations about historic resources. **Revised as a measure related to traditional practices and languages (recommended measure #17).**
51. Number of Main Street Communities. **Dropped from consideration in favor of number of CLGs and Preserve America Communities, which were judged more meaningful for ACHP, NPS and state programs.**
52. Number of Tribal Historic Preservation Offices. **Dropped from consideration because the number of THPOs is not necessarily a good indicator of tribes' commitment to**

preservation, and because this measure might encourage the designation of additional THPOs in the absence of adequate funding.

Economic Development and Development of Community

61. Value of tax assessments of historic properties. **Dropped from consideration because the burden of tracking and reporting outweighed the perceived utility of the measure.**

62. Property tax revenues from historic buildings. **Dropped from consideration because the burden of tracking and reporting outweighed the perceived utility of the measure. Case studies offer a better way to document this significant benefit of preservation.**

63. Value of heritage tourism. **Dropped from consideration because of the difficulty in tracking and reporting and historic preservation's indirect linkage.**

64. Percent of historic structures abandoned. **Dropped as a measure because of the difficulty in tracking and reporting—and the measure's negative focus.**

65. Private capital leveraged by federal historic preservation tax credits. **Recommended by the Team.**

66. Percent of downtown rehabilitation projects assisted by historic tax credits. **Dropped from consideration because the burden of tracking and reporting outweighed the perceived utility of the measure.**

67. Number of jobs created. **Dropped from consideration because of the difficulty in consistently generating reliable estimates of jobs created.**

68. Number of housing units leveraged by tax credit program. **Recommended by the Team.**

69. Number of affordable housing units leveraged by tax credit program. **Recommended by the Team.**

Efficiency Measures

15. Number of Section 106 programmatic agreements. **Team recommended NPS conduct additional studies support estimates of the monetary savings of programmatic agreements.**

70. Average cost of completing Section 106 reviews. **Dropped from consideration because the reporting burden outweighed the utility of the measure and because of the complicating factor of programmatic agreements obviating the need for many routine Section 106 reviews.**

71. Cost of giving a historic property a new designation of other level of protection (existing PART measure) **Dropped from consideration because the funding associated with the**

Federal Historic Preservation Tax Incentives program is so large and so dependent on the state of the general economy that it obscures all other components of the measure.

72. Percent of CLGs and Preserve America communities that have websites that feature historic resources. **Dropped from consideration because such a measure might distract resources from more important activities.**

APPENDIX G
SUMMARY OF 12/9/08 CONFERENCE CALL WITH
TRIBAL HISTORIC PRESERVATION OFFICERS

At Bambi Kraus' suggestion, NATHPO and the Academy invited THPOs to a one-hour conference call on Tuesday, 12/9/08. Participants included: Kris Miller, Bill Helmer, Reno Franklin, and Robert Cast, in addition to Bambi Kraus and Don Ryan.

Ryan provided background on the current effort and reviewed the Team's progress and planned steps. He emphasized that the Team recognized the significant differences between SHPO and THPO programs and was seeking a range of measures, including metrics for unique tribal activities that could be measured quantitatively and qualitatively. Ryan and Kraus emphasized the value of measures that would highlight activities and accomplishments that are unique to THPOs.

Highlights of the call are summarized below:

- Some THPOs expressed concern that this current study on performance measures will not lead to a real understanding of their work and identification of realistic measures. Some fear that new performance measures may work in practice to disadvantage THPOs, whose extremely tight resources limit their effectiveness and accomplishments.
- Many THPOs are one-person offices and several on the call are paid only four days a week. THPOs face the "Catch-22" of needing more core operating funds, while at the same time having to demonstrate under the current funding structure that they can perform the work. In their view, the problem is not poor performance measures but meager funding for their core operations.
- Some of the things identified that distinguish THPO programs are:
 - NAGPRA (in working with both their tribal communities and other affiliated tribal communities, as well as federal repositories and museums);
 - native languages projects (which directly affect their work in the 106 process);
 - the importance of oral history in maintaining the tribe's body of knowledge;
 - TCP surveys on public and private land;
 - monitoring construction projects to ensure proper care of tribal resources;
 - the importance of protecting sensitive sites and sacred places, including places that are so sacred that information cannot be written down.
 - preserving traditional culture.
- Oral history was discussed at some length, including the need to educate non-Natives in the federal-state-tribal partnership as to the value and importance of oral history. Maintaining traditional place names was cited as an example. THPOs have to create a written record for the nomination process, which is difficult because there are strict

restrictions on how much information can be shared and with whom. THPOs feel that the question, “How many nominations did you file?” misses the essence of their work.

- Many THPOs believe the work of THPOs is more complicated than SHPOs in many ways. For example, ancestral homelands are often great distances away. In many cases, tribes’ cultural resources span state boundaries, which requires THPOs to coordinate with multiple SHPOs and fill out paperwork separately for each to accomplish their preservation goals.
- THPOs emphasized that activities related to Section 106 dominate their work (“106 is about all I ever do” in the words of one). THPOs also emphasized that the standard metrics for Section 106 (e.g., number of consultations, number of program agreements signed, number of memorandum of agreement) do not capture the majority of their work. THPOs consistently reported how much time and effort is required to “enforce” compliance with Section 106 by federal agencies that are intent on end-running the law. THPOs reported that just “getting federal agencies to the table” requires: educating federal agencies, investigating unreported undertakings, following up on requests that are ignored, monitoring, challenging, and cajoling – none of which are recognized or measured.
- THPOs described dramatic differences in federal agencies’ implementation of Section 106. They highlighted the value of and need for performance measures to keep track of **federal agencies’** good-faith (or bad-faith) implementation of Section 106.
- Many THPOs do not view PAs as an efficient measure of work and involvement and expressed skepticism over viewing programmatic agreements as a streamlining tool. They noted that federal agencies often unilaterally draft the programmatic agreement and then insist that the THPO sign it “by the end of the week.” THPOs observed that “programmatic agreements seem to help the agency but not the tribe” and stressed the importance of monitoring and periodic reviews.

THPOs maintain that they are doing some of the most unique and exciting work in cultural preservation, but it’s not being supported. They suggested that it would benefit all parties for NPS to devote the time and resources to meet with THPOs and tribes to better understand their work and the challenges they face and to develop appropriate measures.



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