# **Technical Preservation Services**

Federal Historic Tax Credit Program Applicant User Guide



**State Historic Preservation Office** 

**Ohio History Connection** 

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### Introduction

This manual is meant to provide comprehensive guidance on the Federal Historic Rehabilitation Tax Credit (HTC), administered by the State Historic Preservation Office (SHPO) of the Ohio History Connection (OHC). The tax credit program encourages the preservation and rehabilitation of historic buildings, playing a significant role in revitalizing communities and preserving our architectural heritage.

# A Brief History of the Federal Historic Tax Credit Program

Since its inception in 1976, the Federal Historic Preservation Tax Incentives program has played a pivotal role in the preservation and revitalization of historic buildings across the United States. This initiative, administered by the National Park Service (NPS) in partnership with the State Historic Preservation Offices (SHPOs) and the Internal Revenue Service (IRS), has been instrumental in encouraging private sector investment in the rehabilitation of historic properties. By offering a 20% income tax credit for qualifying rehabilitation projects, the program has successfully leveraged over \$116.34 billion in private investment, contributing significantly to community revitalization and job creation. As of 2021, the program generated over \$7.16 billion in private investments in historic preservation and community revitalization. These achievements underscore the program's profound impact not only on preserving America's architectural heritage but also in stimulating economic growth, particularly in historically marginalized communities. The program's success in revitalizing neighborhoods, supporting small businesses, and promoting sustainable development has made it one of the nation's most successful and cost-effective community revitalization programs.

# Application Process Overview for the 20% Federal Rehabilitation

# Investment Tax Credit program:

- This program offers tax credits for qualified projects designated as certified rehabilitation of a certified historic structure.
- The certification application process involves both the State Historic Preservation Office (SHPO) and the National Park Service (NPS).

### Before You Apply

- Consult with an accountant, tax attorney, or the IRS to determine if these incentives apply to your tax situation.
- Ensure the project meets the "substantial rehabilitation" test and other IRS requirements.
- Contact the State Historic Preservation Office for information and technical assistance.

• Familiarize yourself with the Basic Submission Requirements and the <u>Secretary of the</u> <u>Interior's Standards for Rehabilitation</u>.

### Basic Submission Requirements (BSRs)

The basic submission requirements (BSRs) have been developed by the SHPO to help applicants submit the information needed to complete reviews of projects in a timely manner. You can find a complete set of these requirements in the appendix of this document.

### **Application Review Fees**

- Application review fees are charged by the National Park Service (NPS).
- The fee schedule and payment information can be found on the NPS website: <u>https://www.nps.gov/subjects/taxincentives/application-fees.htm</u>.
- There are no fees charged by the SHPO for review of Historic Tax Credit applications.

### Roles of SHPO and NPS:

- Applications are initially submitted to the SHPO, which then forwards them electronically to the NPS with a recommendation.
- Final certification decisions are made by the National Park Service on behalf of the Secretary of the Interior. These decisions may differ from the SHPO's recommendations. We strongly recommend that work proceeds only when NPS approval is secured.
- Official approval from the NPS is conveyed only in writing by authorized Federal Government officials.

# National Register of Historic Places and its role in Tax Credit Applications

For applicants of the Federal Rehabilitation Investment Tax Credit program, it is crucial to recognize that inclusion in the National Register of Historic Places is a prerequisite for final eligibility. The National Register nomination process is managed independently of the tax credit application program and involves submitting comprehensive documentation to prove a property's historical, architectural, or cultural significance and historic integrity. This step is essential for tax credit eligibility and for contributing to the preservation and recognition of historic properties. Given the distinct requirements and timelines for National Register of Historic Places nominations, we recommend all prospective tax credit applicants familiarize themselves with the specific guidelines and submission processes. For detailed information on how to navigate the National Register nomination process, please visit our website at <u>http://www.ohiohistory.org/nationalregister</u>.

### Late Submissions

Owners who wait until after work is complete, and the building is placed in service, before they file Part 1 of the application and, where applicable, request that the SHPO nominate the building or district to the National Register, do not qualify for the 20% tax credit under IRS regulations. For additional information, see <u>Topical Tax Brief - Late Submission of Historic</u> <u>Preservation Certification Applications</u> on the IRS website.

# Response to Holds – A-Z Resubmission

When responding to a reviewer's hold, and/or when revising information, **you must** re-submit the full application in its entirety (including sections that do not require revisions along with the components that do) This ensures that the full and updated package of materials that the applicant intends for the project is transmitted in its entirety to NPS. This also facilitates the review process, helping to ensure maximum efficiency and timeliness.

Resubmissions must make revisions clear by using the following color-codes (both in the narrative and on drawings). Distinct colors are needed for each Hold response, with the goal being that all questions are answered in the first hold.

- 1. First Revisions Red
- 2. Second Revisions Blue
- 3. Third Revisions Green

When transmitting a response to a hold through our online portal, the applicant must confirm that they have only changed the items marked with the appropriate color-code.

# Part 1: Evaluation of Significance

Use the Part 1 application to request certification that a building:

- 1. Contributes to the significance of a registered historic district, or a National Register of Historic Places (NRHP) property with more than one building and is thus a "certified historic structure" for purposes of the 20% rehabilitation tax credit or for easement donation purposes.
- 2. Request a preliminary determination:
  - of whether an individual building not yet listed in the National Register of Historic Places might meet the National Register Criteria for Evaluation.
  - of whether a building in a potential historic district contributes to the significance of that district.
  - of whether a building outside the period or area of significance of a registered historic district contributes to its significance.
- 3. If the property is a single building listed individually in the National Register of Historic Places (NRHP) and its condition is not significantly different (it still retains its historic character); it is already a "certified historic structure," a Part 1 is not needed.

Part 1 is required for all other properties, including individually listed properties that have more than one building.

4. If the building is neither within a registered historic district nor individually listed in the NRHP, the owner must submit Part 1 and begin the process of requesting the SHPO to nominate the building or the district to the National Register.

Download the application and instructions booklet for submitting the <u>Part 1: Evaluation of</u> <u>Significance application</u>. Once you have completed your application, proceed with the E-Submission Requirements in this guide.

### Part 1 Review Decision by the National Park Service

The National Park Service will convey its Part 1 decision by e-mailing a copy of the signed decision to the applicant.

#### Additional Guidance and Tips for Completing and Submitting Part 1 Application.

- 1. Submit Part 1 before Part 2, and before starting any work.
- 2. Use information from Sections 7 and 8 of the National Register nomination for properties within historic districts.
- 3. Include photographs taken before starting any work, following specific guidelines for orientation and size.

#### Part 1 and the National Register of Historic Places

- Contact the State Historic Preservation Office by phone at 614-298-2000 to determine if the property is listed individually or part of a listed historic district.
- For buildings within National Register-listed historic districts, use relevant information from Section 7 and 8 of the National Register nomination to prepare Part 1.

### When Should I Submit Part 1 Application?

- The Part 1 Application should be submitted if you are seeking a preliminary determination of National Register eligibility for a property not yet listed or if your property is located within the boundaries of a National Register-listed historic district. To avoid project delays, submit Part 1 well ahead of the planned start date.
- If rehabilitation work is completed and the building has been placed in service prior to the submission of Part 1, the project will not qualify for the tax credit according to IRS regulations. To learn more about late submissions, read <u>Topical Tax Brief – Late</u> <u>Submission of the Historic Preservation Certification Application</u>. It is recommended you consult the IRS about late submissions.
- 3. If you are working with a property that is less than fifty years old, has experienced extensive alterations or additions, or the history and significance of the property are difficult to determine, work with the Inventory and Registration Department of the

State Historic Preservation Office to complete a National Register Preliminary Questionnaire before submitting the Part 1 application.

### What Should I Submit with the Part 1 application?

- 1. A draft National Register Nomination is needed for properties not yet listed in the National Register, a draft narrative, equivalent to Sections 7 and 8 of a National Register nomination must be submitted with the completed Part 1 application. Please see "Submitting a National Register of Historic Places Nomination" for further information on this process.
- 2. Historic District Map
  - A copy of the district map from the National Register nomination should be included for buildings in a National Register-listed historic district. Clearly mark the property location on the district map.
- 3. Photographs
  - All Part 1 and Part 2 photographs should be taken at the same time, BEFORE starting any work and submitted with the Part 1 application. All submitted photos must follow these guidelines:
  - Photo Orientation: Align the photos correctly on the page. Use two landscape photos or one portrait photo per page. The page should have a portrait orientation.
  - Photo PDF File: Place the photos in a separate PDF file, with a maximum of two per page. If necessary, adjust the number of photos per page to be sure they are properly oriented. ALL photos' views must be oriented upright.
- 4. Photo Key: Save the photo key as a separate PDF file, ensuring that it includes matching property address and photo numbers as found in the photo PDF.
  - Identifying Photos: Each page of the photos must include the property address, date of the photos, application part (e.g., Part 1, Part 2, Part 3, Amendment) and photo number as they appear on the Photo Key, See Appendix C for examples.
  - Whenever possible include a floor plan with the photos keyed to the plan. This should include the number of each photograph and an arrow pointing in the direction it was taken.

### Submitting Part 1 Photos

- 1. Submit photos as a single PDF file.
- 2. Photo Orientation:

- 3. Align the photos correctly on the page. Use two landscape photos or one portrait photo per page. The page should have a portrait orientation. Photo PDF File:
  - Place the photos in a separate PDF file, with a maximum of two per page if in landscape, one per page if in portrait. If necessary, adjust the number of photos per page to be sure they are properly oriented. **ALL** photos' views must be oriented upright.
- 4. Photo Key:
  - Save the photo key as a separate PDF file, ensuring that it includes matching property address and photo numbers as found in the photo PDF.
- 5. Identifying Photos:
  - Each page of the photos must include the property address, date of the photos, application part (e.g., Part 1, Part 2, Part 3, Amendment) and photo number as they appear on the Photo Key, <u>click here for examples.</u>
- 6. Photo Size:
  - Each photo must be a minimum size of 4" x 6" and minimum 300 dpi.

### How Can I Know the Best Photographs to Take?

- 1. Views of all interior and exterior spaces and elevations are required whether you intend to work in those areas or take the tax credit for those areas. Additional things to consider when taking photographs:
- 2. Remember that the state and federal reviewers do not know the building! The photos need to document every aspect of it, top to bottom, inside and out.
- 3. Make sure spaces are well lit and otherwise adjust camera settings to achieve the best quality photos.
- 4. Exterior photographs must include all elevations, the immediate site area and the surrounding buildings and streetscape.
- 5. Interior photographs should be taken and cross-referenced going systematically floor by floor.

### How Long Does It Take for a Part 1 To Be Reviewed?

- The review period for SHPO is 30 days. The National Park Service review period is 30-90 days from the date of transmission from SHPO to NPS.
- Incomplete Submission: The assigned reviewer will put your project on hold if it is missing any information needed for a thorough review, this includes but is not limited to missing work items, photos keys, drawings etc. You will receive a written notice by letter or email of any hold. Once the project is placed on hold, the 30-day review period will stop until you provide the missing information. The 30-day review period will resume from the date of your complete submission.

#### Common Definitions

• Certified Rehabilitation: Rehabilitation projects approved by the National Park Service, consistent with the historic character of the property.

• Certified Historic Structure: Buildings listed in the National Register of Historic Places or contributing to the historic significance of a registered historic district.

# Part 2: Description of Rehabilitation Work

Part 2 describes rehabilitation work to be undertaken on the building and must be completed by all applicants seeking the Federal Historic Tax Credit.

You are strongly encouraged to submit applications describing proposed work and receive NPS approval before the start of work. Per 36 CFR Part 67, owners who undertake work without approval from the Secretary of the Interior via the National Park Service, do so at their own risk. Familiarize yourself with the Basic Submission Requirements (BSRs) compiled by the State Historic Preservation Office (SHPO) to facilitate application preparation.

Following state-level review, the SHPO transmits the application with its recommendations to the National Park Service for final review and decision.

SHPO recommendation options include:

- Project meets the Standards for Rehabilitation
- Project meets the Standards only if listed conditions are met.
- Project does not meet Standards for reason(s) enumerated.
- Project warrants denial for lack of information
- Project is being forwarded without recommendation.

From the time a complete application is received by the National Park Service and the federal review fee is paid, it takes 30 to 90 days to receive the National Park Service decision.

Download the application and complete instructions booklet for submitting the <u>Part 2:</u> <u>Description of Rehabilitation Work</u> application. Once completed, proceed with the E-Submission Requirements in this guide.

### Part 2 Review Decision by the National Park Service

The National Park Service will convey its Part 2 decision by e-mailing a copy of the signed decision to the applicant.

### Additional Guidance and Tips for Completing and Submitting a Part 2 Application.

The Ohio SHPO encourages applicants to schedule a preliminary meeting with a member of the Technical Preservation Services Department early in the project planning. This should be done prior to beginning construction. Applicants are advised to provide a project summary and a detailed description of the building's features and sites. (Pre-application meetings are required for projects pursuing the Ohio Historic Preservation Tax Credits.)

Part 2 applicants are strongly encouraged to submit applications describing proposed work and receive approval from the National Park Service before construction starts. Owners who

undertake rehabilitation projects without prior National Park Service approval do so at their own risk.

### Preliminary Meeting

Arrange an initial meeting with the Technical Preservation Services Department staff at the outset of the project planning phase, before starting rehabilitation activities. We are here to assist you. We want your project to be successful, and early planning is key.

Please contact Sam DeCillis at 614.298.2000 or <u>sdecillis@ohiohistory.org</u> to discuss setting up a preliminary meeting.

While we cannot design your project or recommend products, we are happy to review the initial materials and information you have presented to us and give our feedback and workable solutions. Please do not hesitate to contact our office by phone at 614.298.2000 with any questions at any point in the process.

### General Recommendations

- 1. Carefully read and follow the application instructions and call our office at 614.298.2000 with any questions.
- 2. Submit Part 2 well before the planning commencement of construction. The typical review period for Part 2 is 90 days. It is important to allow this amount of time for the review and approval process conducted at the state and federal levels. This 90-day review period does not include processing time, or more than one round of clarifying questions.
- 3. Submit complete and accurate project information to avoid multiple holds. In all instances, though the written narrative takes precedence, drawings and the application narrative must agree, or the project may be placed on hold.
- The Part 2 cover sheet must have complete and accurate information. State and federal reviewers cannot change anything on the cover sheet. <u>You must submit a</u> <u>new cover if there are any errors</u>.

Pay attention to details such as:

- Social Security number
- TIN for businesses
- zip-plus-4 zip code
- acceptable electronic and dates (see electronic submissions guidelines for digital signatures), and
- all applicable checkboxes.
- 5. The National Park Service makes all final decisions on the certification application. Owners should always wait for the National Park Service's decision before proceeding with any work or ordering materials.

### What Information Should I Include in Part 2?

- 1. Project Summary Paragraph
  - Use the first field under Item 5., Project Description, to provide a paragraph or two summarizing the project and its timeline.
- 2. Feature by Feature Descriptions [Also Known as the Project Narrative]
- 3. Be sure to address all features of the building and its site, historic or not, in completing the project narrative. If you are not doing work to a feature, describe the feature and state "no work to be done." All work must be discussed in this section even if others are paying for the work. Include construction or alteration of features and additions. For the State Historic Preservation Office to determine the effect of the proposed work on the appearance, integrity and condition of the building and its component, work must be described in detail. Note that in the case of any discrepancy between the application form and supplementary materials submitted with it, such as architectural plans, the application form takes precedence.
- 4. State clearly if the specifics of work to a feature or system are unknown, state that once known. Submit final details before work begins through the Amendment review and approval process. Please use caution when doing this as projects are reviewed holistically to determine the impact on historic fabric and the impact on historic fabric and the compatibility of the work, thus compliance with the Standards.
- 5. Features and systems to include in the project narrative include but are not limited to the following:

#### Exterior

- additions
- cornice
- doors
- foundation
- roof and drainage systems
- siding
- signage and exterior lighting
- site
- trim
- wall treatment(s)
- windows

#### Interior

- doors and trim
- electrical system
- each major interior space
- flooring
- HVAC systems
- new construction
- plumbing, including sprinklers
- secondary spaces
- stairs
- walls and ceilings

### What Should I Submit with Part 2?

1. Be sure to check the Documentation Requirements page on the National Park Service tax program website.

- 2. Drawings
  - Most projects require drawings. Please submit only "meaningful" and legible drawings; that is, drawings that give a good visual representation of the descriptions in the application narrative.
  - Separate existing conditions from the proposed work drawings (See electronic submission guidelines for how to submit drawings).
- 3. Photographs
  - Whenever possible include a floor plan with the photos keyed to the plan. This should include the number of each photograph and an arrow pointing in the direction it was taken.
  - See tips regarding photographs under Part 1 Tips (See electronic submission guidelines for how to submit photos).

### Submitting Part 2 Photos

- 1. Submit photos as a single PDF file.
- 2. Photo Orientation:
- 3. Align the photos correctly on the page. Use two landscape photos or one portrait photo per page. The page should have a portrait orientation. Photo PDF File:
  - Place the photos in a separate PDF file, with a maximum of two per page if in landscape, one per page if in portrait. If necessary, adjust the number of photos per page to be sure they are properly oriented. **ALL** photos' views must be oriented upright.
- 4. Photo Key:
  - Save the photo key as a separate PDF file, ensuring that it includes matching property address and photo numbers as found in the photo PDF.
- 5. Identifying Photos:
  - Each page of the photos must include the property address, date of the photos, application part (e.g., Part 1, Part 2, Part 3, Amendment) and photo number as they appear on the Photo Key, <u>click here for examples.</u>
- 6. Photo Size:
  - Each photo must be a minimum size of 4" x 6" and minimum 300 dpi.

#### Additions

If plans include one or more additions as part of the project, submit a model, photos of a physical mock-up, and/or a rendering with a sightline study for any additions, including rooftop work. The submission of sightline studies alone is typically insufficient. Photos taken from several vantage points around the building and neighborhood may be required.

In Part 2 we must have a sufficient understanding of what the overall project will be and if the project will meet the Standards to complete our review and issue a recommendation. We evaluate the impact of historic fabric and visual compatibility — both of which must be in conformance with the Standards, which is the only metric permitted to use for the tax credit program. Also, think of your construction timeline and plan accordingly when

submitting these items via an Amendment.

### How Long Does It Take for Part 2 To Be Reviewed?

The review period for SHPO is 30 days. The National Park Service review period is 30-90 days from the date of transmission from SHPO to NPS.

Incomplete Submission: The assigned reviewer will put your project on hold when it is missing any information needed for a thorough review, this includes but not limited to missing work items, photos keys, drawings etc. You will receive a written notice by letter or email of any hold. Once the project is placed on hold, the 30-day review period will stop until you provide the missing information. The 30-day review period will resume from the date of your complete submission.

### When is an Amendment Needed?

An amendment should be submitted if aspects of the work were unknown at the time, Part 2 was submitted and if any aspect of the rehabilitation project changes during the work. The applicant risks an amendment being denied if work items are conducted prior to the conclusion of the amendment review and approval by SHPO and NPS.

Consider your amendment submission as a mini-Part 2 application – with as much detail and all pertinent supplemental information (such as drawings, renderings, additional photographs, etc.) included. As with Part 2, the Amendment narrative takes precedence, and all materials must agree.

Discuss potential amendments with your State Historic Preservation Office reviewer before submitting an amendment to facilitate the review and approval process.

#### List All Amended Items

Briefly describe all amended items on the amendment cover sheet in the space above the signature block. Then, attach additional sheets to specifically describe the proposed changes. Submit drawings, photos, and supplemental information as needed.

#### **Differentiate the Narrative Revisions**

Make the new proposed amendments clear from the original proposed amendment by highlighting or italicizing the changes. Only work items clearly identified in the Amendment narrative as "being revised" or "amended" will be reviewed.

#### Drawings

Include only "meaningful" drawings in all submissions, including amendments. Limit the review to drawings where revised details are clearly identified. Clearly indicate the areas of change through labels, "clouding," or highlighting in the work. Ensure that all revised work details are explicitly outlined in the narrative, rather than solely depicted in the drawings."

Interim approvals for fully completed phases are submitted on amendment forms; however, if full project completion is imminent, please wait and submit the full Part 3.

Build into your work schedule sufficient time for the Amendment(s) review process including the National Park Service decision, which is typically no less than 30 days, not including transmission time. The 30-day review clock begins anew whenever additional information is needed.

The National Park Service makes all review decisions, so applicants should always wait for the National Park Service decision prior to proceeding with any work or ordering materials. To begin work before NPS approval is to proceed at one's own risk.

#### **Common Definitions**

- Qualified Rehabilitation Expenditures (QREs): Costs associated with the work on the historic building, including architectural and engineering fees, site survey fees, legal expenses, development fees, and other construction-related costs.
- Depreciable: The building must be used in a trade or business or held to produce income, excluding exclusive use as the owner's private residence.
- Substantial: Rehabilitation expenditures must exceed the greater of \$5000 or the adjusted basis of the building and its structural components within a 24-month period.
- Phased Project: A rehabilitation project completed in distinct stages, with a 60month measuring period for the substantial rehabilitation test.

### Windows

When dealing with historic windows, the foremost strategy is to preserve and repair these windows whenever possible. This approach is rooted in the principle of maintaining the authenticity and integrity of historic structures. Historic windows often contribute significantly to a building's character and aesthetic appeal, and they can also embody unique craftsmanship and materials not found in modern windows.

For those unfamiliar with the nuances of historic preservation, it is important to understand that the goal is always to retain as much of the original material and design as possible. This not only preserves the historical significance and value of the property but also supports sustainable practices by extending the life of existing materials. Engaging with professionals who specialize in historic preservation can provide guidance and ensure that any intervention respects the building's heritage and complies with relevant preservation standards and guidelines.

Window Repair

Review Preservation Briefs and Tech Notes on window repair. These can be found online at <u>https://www.nps.gov/orgs/1739/tps-publications.htm</u>.

See also a page developed by the California State Historic Preservation Office on window repair. (<u>https://ohp.parks.ca.gov/?page\_id=25935</u>)

#### General Replacement Window Tips

- All replacement windows should feature details that are typical of the historic window characteristics for that building (i.e., industrial sash, wooden double-hung, etc.). For example, when replacing historic wooden double-hung windows, the new units should have mortise & tenon joinery (butt joints; no mitered corners), a beveled putty detail, etc.
- Replacement windows should fill the historic masonry/rough opening(s) entirely and be installed in the same plane in the wall as the historic windows.
- If no historic trim remains on the interior, it is our experience that NPS prefers that replacement windows be installed within rough masonry openings when replacement is justified. Though this may result in the removal of existing window framing, brick mold, etc., it allows for the installation of an entirely new window assembly while protecting the historic daylight opening. If historic trim remains on the interior, care should be taken to retain this trim and work within it. This may result in the installation of a new sash only as opposed to entirely new window assemblies when replacement is justified.
- While NPS affords greater latitude in the accepted level of variation in new windows on secondary elevations and upper floor openings with a reduced level of visibility from the ground, SHPO strongly encourages an emphasis on simplicity in all replacement windows. A focus on the proportionality of components, replication of historic details such as butt joints and a beveled putty detail, and minimization of excess shadow lines resulting from cladding extrusions, screen tracks, etc., is the best way to ensure compatibility and increase the likelihood of receiving a recommendation for approval.
- Unlike measured drawings, mock-ups are not required documentation for projects involving window replacement. However, SHPO believes that mock-ups are an excellent way to document the visual differences between existing and proposed windows and welcomes their inclusion as supplemental documentation if many windows are replaced.

### Replacement of Non-Historic Windows

Existing windows that do not contribute to the building's significance and are scheduled for replacement may be replaced with windows that replicate the characteristics of the building's historic windows if pictorial or physical documentation exists to inform decision making. However, the minimum requirement in this scenario is only that the replacement windows be compatible with the building's historic character.

#### Required Documentation for Replacement Windows

Replacement windows must replicate the characteristics of the building's historic windows if known or must otherwise be compatible with the historic character of the building.

The State Historic Preservation Office recommends submitting a supplemental window key plan/elevation depicting locations of all windows, including information about window material, configuration, operation, and installation date/contribution to the property's historic significance. This information should be submitted for SHPO review and comment and National Park Service approval prior to ordering replacement windows or beginning work.

The National Park Service requires the following information when window replacement work is proposed:

- Exterior and interior elevations of proposed windows
- Exterior and interior elevations of existing windows (if historic)
- Vertical section(s) of proposed windows
- Vertical section(s) of existing windows (if historic)
- Horizontal section(s) of proposed windows
- Horizontal section(s) of existing windows (if historic)

### Part 3: Request for Certification of Completed Work

Use the Part 3 form to request approval of the entire completed rehabilitation project. For a completed phase of a project, use an Amendment /Advisory Determination form. The completed project may be inspected by the State Historic Preservation Office (SHPO) and/or an authorized representative of the Secretary of the Interior to determine if the work meets the Standards for Rehabilitation. Part 3 recommendations and decisions may only be made when the work is fully complete.

Following state-level review, the SHPO transmits the Part 3 application with its recommendation to the National Park Service for final review and approval providing a copy of those recommendations to the property owner and the consultant, if applicable, by email.

From the time a complete application is received by the National Park Service (NPS) and the federal review fee is paid, it takes 30 to 90 days to receive the NPS decision.

Download, the application and complete instructions booklet for submitting the <u>Part 3:</u> <u>Request for Certification of Completed Work</u> application. Once completed, proceed with the E-Submission Requirements in this guide.

#### Part 3 Review Decision by the National Park Service

The National Park Service will convey its Part 3 decision by e-mailing a copy of the signed decision to the applicant.

### Additional Guidance and Tips for Completing and Submitting a Part 3 Application

Prior to submitting your Part 3 to our office, carefully re-review your approved Part 2 and any subsequent project Amendments. If you promised to submit something or do something in Part 2 or an Amendment, you must state in the Part 3 application how this promise was fulfilled. The owner must submit a cover letter or an Amendment sheet with Part 3 to indicate how the conditions placed on Part 2 or Amendment approvals were met.

#### Submit Amendments Forms as Needed

Use an Amendment form to describe work not undertaken or if any revisions were made to the project without first seeking National Park Service approval.

#### Photographs

- 1. Whenever possible, take the Part 3 completion photos from the same locations and number them the same as the Part 1/Part 2 photos. This will simplify your preparation of the photo key (on current/rehab plans) and make it easier for us and the National Park Service to review Part 3.
- 2. Point out the photographs that satisfy compliance with project conditions or Amendments.
- 3. Submit photographs of all areas of the building and site sufficient to convey all aspects of the after-rehabilitation appearance. This includes areas where no work was done, and the appearance is unchanged and areas where work was completed but for which you are not taking the tax credit. All work on projects receiving Federal credit must meet the Secretary of the Interior's Standards at the project's completion and for five years after completion and the building is placed in service.
- 4. Whenever possible include a floor plan with the photos keyed to the plan. This should include the number of each photograph and an arrow pointing in the direction it was taken.

#### Submitting Part 3 Photos

- 1. Submit photos as a single PDF file.
- 2. Photo Orientation:
- 3. Align the photos correctly on the page. Use two landscape photos or one portrait photo per page. The page should have a portrait orientation. Photo PDF File:
  - Place the photos in a separate PDF file, with a maximum of two per page if in landscape, one per page if in portrait. If necessary, adjust the number of photos per page to be sure they are properly oriented. **ALL** photos' views must be oriented upright.
- 4. Photo Key:
  - Save the photo key as a separate PDF file, ensuring that it includes matching property address and photo numbers as found in the photo PDF.

- 5. Identifying Photos:
  - Each page of the photos must include the property address, date of the photos, application part (e.g., Part 1, Part 2, Part 3, Amendment) and photo number as they appear on the Photo Key, <u>click here for examples.</u>
- 6. Photo Size:
  - Each photo must be a minimum size of 4" x 6" and minimum 300 dpi.

### **Common Definitions**

- Placed in Service Date: The date when the property is returned to use, relevant for the rehabilitation tax credit.
  - Please note that the Placed In-Service Date cannot be after the applicant has signed the HPCA Part 3 Certification Form.

### How Long Does It Take for My Part 3 To Be Reviewed?

- The review period for SHPO is 30 days. The National Park Service review period is 30-90 days from the date of transmission from SHPO to NPS.
- Incomplete Submission: The assigned reviewer will put your project on hold if it is missing any information needed for a thorough review, this includes but is not limited to missing work items, photos keys, drawings etc. You will receive a written notice by letter or email of any hold. Once the project is placed on hold, the 30-day review period will stop until you provide the missing information. The 30-day review period will resume from the date of your complete submission.

### Amendments to Approved Work / Advisory Determinations

Use an Amendment / Advisory Determination form to:

- Submit the information requested by the National Park Service (NPS) for an application under review by NPS and on hold.
- Inform the NPS of a change in ownership.
- Amend a previously submitted Part 1, 2, or 3 applications.
- Request an advisory determination as to whether a completed phase of a phased rehabilitation project meets the Secretary of the Interior's Standards for Rehabilitation

Download, the application and complete instructions booklet for submitting the <u>Amendment to Approved Work / Advisory Determination</u> application. Once completed, proceed with the E-Submission Requirements in this guide.

#### How Long Does It Take to Review an Amendment?

• The review period for SHPO is 30 days. The National Park Service review period is 30-90 days from the date of transmission from SHPO to NPS.

• Incomplete Submission: The assigned reviewer will put your project on hold if it is missing any information needed for a thorough review, this includes but is not limited to missing work items, photos keys, drawings etc. You will receive a written notice by letter or email of any hold. Once the project is placed on hold, the 30-day review period will stop until you provide the missing information. The 30-day review period will resume from the date of your complete submission.

Advisory Amendments are to be submitted directly to the National Park Service for review, with a courtesy copy submitted to the State Historic Preservation Office via our electronic submissions form.

#### Amendment Review Decision by the National Park Service

The National Park Service will convey its Amendment decision by e-mailing a copy of the signed decision to the applicant.

Amendment & Advisory Determination Review Decision by the National Park Service The National Park Service will convey its Amendment & Advisory Determination decision to the applicant by email which will include a copy of the signed decision to the applicant.

### Submitting Your Project for SHPO Review

Each component of the application, Part 1, Part 2, or Part 3, Amendment, must be saved as a separate PDF file, conforming to the file naming conventions. If an additional narrative is included, please use the second page (and additional pages, as needed) of Part 1 or Part 2 of the HPCA application and complete all required details. It is also permissible to create your own additional narrative information (in Word for example) and save it as a separate PDF.

### Photographs

Submit photos as a PDF following these guidelines:

- **Photo Orientation:** Be sure photos are properly oriented on the page and that the page is formatted in portrait orientation.
- Photo PDF File: Place the photos in a separate PDF file, with a maximum of two per page. (We recommend one per page.) If necessary, adjust the number of photos per page to be sure they are properly oriented. ALL photo views must be oriented upright.
- **Photo Key:** Save the photo key as a separate PDF file, ensuring that it includes matching property address and photo numbers as found in the photo PDF.
- Identifying Photos: Each page of the photos must include the property address, date of the photos, application part (e.g., Part 1, Part 2, Part 3, Amendment), brief description of view being shown, and photo number as they appear on the Photo Key, click here for examples.

• **Photo Size:** Each photo must be a minimum size of 4" x 6" and minimum 300 dpi.

#### Architectural Plans or Drawings

Reduce the file size of architectural plans and drawings as follows:

#### Save as PDF: Convert plans and drawings into PDF format for submission.

- 1. Select the "Print" function: Open the file and navigate to the "Print" option within the software.
- 2. Choose "Adobe PDF" as the printer: From the available printer options, select "Adobe PDF" as the designated printer. This selection ensures that the file is converted into the PDF format.
- 3. Save the file: After selecting "Adobe PDF" as the printer, proceed to save the file. Use the file naming conventions to appropriately name the file and ensure consistency in file organization.

Existing and proposed plans: Submit existing and proposed plans as separate files. This separation helps in distinguishing between the current state of the structure and the proposed rehabilitation work.

#### Supplemental Information

Save as PDF: Convert the supplemental information into a PDF format for submission.

Naming conventions: Use the file naming conventions in this user guide to name all files submitted for review. Following these conventions will maintain consistency and facilitate efficient organization of the documents.

#### Signatures

Acceptable types of electronic signatures (e-signatures) for the application component are:

- Digital Signatures using a digital ID (e.g., Adobe software)
- Scanned or digitized versions of an original handwritten signature
- Scanned PDF of original wet signed HPCA application

Digital signatures using computer-generated fonts or other types of generated signature images will not be accepted.

#### Ready to Transmit to SHPO

Ensure all application components are complete according to the e-submission requirements.

Place the application and supporting materials in a file transfer program with the proper file sharing permissions set.

<u>Click here</u> to submit your project or visit our website at <u>www.ohiohistory.org/FederalHTCs</u> and click on the "Transmit to SHPO" tab under "Submitting Your Federal Tax Credit Application."

If you have questions regarding how to submit your electronic application to SHPO, please contact Casey Juday at <u>cjuday@ohiohistory.org</u>.

The State Historic Preservation Office (SHPO) is here to assist you with any questions throughout the tax credit application submission process. These OH SHPO basic submission requirements afford us a better opportunity to provide applicants with more complete review comments, because the submitted information is more complete, which in turn affords applicants confidence that their project, if completed as approved, will receive final certification. The BSRs help evaluate proposed material and visual impact on features, including those listed below, and as they relate to the Secretary of the Interior's Standards for Rehabilitation. These are basic, however, and your project may include other work for which additional information may be needed, depending on the project scope, to assess conformance to the Standards.

#### Basic Submission Requirements (BSRs):

- HVAC & Plumbing (including sprinkler), and Electrical Work narrative descriptions of systems work, focusing on how the placement and finish of MEP systems will materially and visually impact historic features or spaces, plus drawings. Information sufficient to verify that it is feasible to locate the systems as proposed, is requested. If systems are to be concealed above/within ceilings or walls, please provide, in your narrative, the dimensions of the largest system feature and the dimension of the space available. (Goal - details sufficient to allow SHPO and NPS to understand the physical manifestations/visual impact of MEP work.)
- 2) Description of Changes to Finishes, Features, and/or Surfaces if building finishes, features, or surfaces (walls, ceilings, floors), to be worked on are not historic or significant, then please provide evidence of this and of underlying/uncovered conditions, along with a narrative description of impact to finishes, features, and surfaces that are historic. Please provide descriptions of any new finishes, features, & surfaces.

#### 3) Alteration of Historic Spaces

- a) description of any subdivision of significant, historically open spaces where it is proposed (with drawings as applicable)
- b) description of alteration(s) to the historic plan where it is proposed (with drawings as applicable)
- 4) **Storefront Work** narrative description of the work and indication of any historic fabric remaining, supplemented by dimensioned drawings. In addition to dimensions, drawings should represent the design, configuration, scale of elements, colors and materials and include/show details of the storefront within the opening.
- 5) **Rooftop Work** narrative description detailing visibility (or lack thereof) supported by physical mock-ups and drawings.
- 6) **New Additions** narrative description of material and visual impact, including materials for the proposed addition, plus drawings.
- 7) Windows where new window or window replacement work is proposed, (and if historic, windows have been demonstrated to be beyond reasonable repair), information should be submitted sufficient to guarantee the appropriate compatibility or match and outlining how the appropriate appearance will be achieved. If detailed drawings are not available at application submission, window work can be conditioned, with details then submitted via an amendment. If replacing historic windows, justification for replacement, including photos showing level of deterioration, should be submitted with Part 2 and/or prior to the initiation of window work.
- 8) Masonry Work if cleaning, repointing or rebuilding is proposed, close-up photos of the affected areas should be included along with descriptions of areas to be affected, work proposed, and impact – including percentages and verification that the work will be done without damage and to match surrounding historic material. After photos should be provided at Part 3.

While the submission of exterior paint colors is no longer a basic submission requirement, all work, including all finishes, must be compatible to the building, inside and out, to conform to the Standards. As a result, applicants are still welcome to submit colors for a recommendation.

Please do not hesitate to discuss work item(s) with your Part 2/Amendment reviewer at or before the submission of your Part 2 application or Amendment submission for any guidance, as well as any other needed work not mentioned in the basic items listed above.

Thank you.

### Federal Historic Rehabilitation Tax Credit File Naming Conventions

The following file naming conventions have been established by the State Historic Preservation Office and are to be used for all submissions of project materials.

#### File Naming Conventions *Before* National Park Service (NPS) Project Number Assignment:

For the initial transmission of tax project application materials such as folder names, application, photographs, and supplemental materials, the format is:

ApplicationPart\_ApplicationComponent\_PropertyAddress\_City\_State

P1\_<mark>Hold1\_123MainSt</mark>\_Akron\_OH

Additional Examples:

- P1\_123MainSt\_Akron\_OH
- P2\_123MainSt\_Akron\_OH
- P3\_123MainSt\_Akron\_OH
- Amend1\_123MainSt\_Akron\_OH
- P1\_Dwgs\_123MainSt\_Akron\_OH

#### File Naming Conventions After NPS Project Number Assignment:

After the NPS has assigned a project number, which occurs upon initial transmission of application materials from SHPO to NPS, the naming convention should also include the NPS Project Number:

- 45678\_Amend1\_123MainSt\_Akron\_OH
- 45678\_Amend1\_Dwgs\_123MainSt\_Akron\_OH

#### File Naming Tips:

The following rules should be followed when naming files:

- Limit names to 75 characters.
- Do not include spaces, punctuation, or special characters.
- Use Camel Case (i.e., Capitalize Each Word).
- Use underscores instead of spaces between parts of the file name.

#### Project File Folder Name:

Application components should be stored in a digital folder that is named following the same general naming conventions.

- P1\_123MainSt\_Akron\_OH (Initial Submission)
- 45678\_P1\_123MainSt\_Akron\_OH (once an NPS number has been assigned)

#### Application Components:

The application consists of several components, each with a specific file name. Items such as Amendments and Hold Reponses may have multiple submissions. Add the # for the item as seen in the examples below.

Component Name	File Format Sample
Part 1	P1_123MainSt_Akron_OH
Part 2	P2_123MainSt_Akron_OH
Part 3	P3_123MainSt_Akron_OH
Amendment	Amend1_123MainSt_Akron_OH
Photographs	P2_Photos_123MainSt_Akron_OH
Historic Photos	HPhotos_123MainSt_Akron_OH
Photo Key	P2_PhotoKey_123MainSt_Akron_OH
Drawings or Plans	P2_Dwgs_123MainSt_Akron_OH
Existing Drawings	P2_ExDwgs_123MainSt_Akron_OH
Proposed Drawings	P2_PropDwgs_123MainSt_Akron_OH
Demolition Drawings	P2_DemoDwgs_123MainSt_Akron_OH
Response to Hold	P2_HOLDResp1_123MainSt_Akron_OH
Supplemental Information	P2_SuppInfo_123MainSt_Akron_OH

Additional approved file name abbreviations.

- Revision/Revised Rev (for identifying revisions from precious narrative submissions)
- St St
- Avenue Ave
- Road Rd
- Boulevard Blvd

Please note that these naming conventions are subject to change.

Last Updated 10-17-2023



### State Historic Preservation Office Federal Historic Tax Credit Application Photo Requirements and Examples

The following requirements for the submission of photos have been established by the State Historic Preservation Office and are to be used by all submissions to our office.

Photo Submission Guide:

- 1. **Photo Orientation:** Be sure photos are properly oriented on the page and that the page is formatted in portrait orientation.
- 2. **Photo PDF File:** Place the photos in a separate PDF file, with a maximum of two per page. If necessary, adjust the number of photos per page to be sure they are properly oriented. **ALL photos views must be oriented upright.**
- 3. **Photo Key:** Save the photo key as a separate PDF file, ensuring that it includes matching property address and photo numbers as found in the photo PDF.
- 4. **Identifying Photos:** Each page of the photos must include the property address, date of the photos, application part (e.g., Part 1, Part 2, Part 3, and Amendment) and photo number as they appear on the Photo Key, see examples below.
- 5. Photo Size: Each photo must be a minimum size of 4" x 6" and minimum 300 dpi.

OH SHPO Photo Sheet

Photo Sheet Example PDF: Goodyear Hall, 1201 E. Market Street, Akron Part 1 & 2 / 3/25/2013



1. Front façade looking south east



2. Interior lobby of theater

OH SHPO Photo Sheet

Photo Sheet Example PDF: Goodyear Hall, 1201 E. Market Street, Akron Part 1 & 2 / 3/25/2013



3. Interior residential unit, 3rd Floor