

National Register of Historic Places: Selected States and Tribes Identified Challenges to Participation

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Q&A Report to the Ranking Member, Committee on Natural Resources, House of Representatives

August 14, 2026

Why This Matters

The National Register of Historic Places is the nation's official list of historic places worthy of preservation. Administered by the National Park Service (NPS) in cooperation with states and Tribes, it is a key part of a national program to coordinate and support efforts to identify and protect America's historic and archeological resources.

Over 100,000 properties are listed on the National Register and comprise a variety of historic locations, including buildings (see fig. 1), districts, and landscapes. However, some stakeholder groups have raised questions about whether the National Register is representative of the nation's full story and whether certain groups, such as Tribes, are sufficiently included.

Figure 1: Booker T. Washington High School in Georgia, a Property Listed on the National Register of Historic Places



Source: GAO. | GAO-26-107879

You asked us to report on the National Register and the challenges faced by selected State and Tribal Historic Preservation Officers, who play a key role in the process of nominating properties to the National Register. Our review provides information on these topics.

Key Takeaways

- State Historic Preservation Officers we interviewed reported challenges with NPS's National Register guidance being out of date or lacking information on certain topics. They also said that nominating sites to the National Register is challenging for the public because program guidance is written using academic language and tailored for historic preservation professionals. NPS officials told us they would like the program to be accessible and that they would consider plain language guidelines when updating guidance. While NPS intends to update its guidance, it has not developed a plan for doing so.
- Some Tribes and a tribal organization we interviewed believe the National Register listing criteria do not sufficiently accommodate locations significant to Tribes. While NPS has published guidance on applying the criteria to cultural sites, it has opportunities to more effectively communicate this information to Tribes.
- Tribal officials raised concerns about nominating tribal historic sites to the National Register because disclosing site locations could put these sites at risk for harm. While there is a statutory provision that allows location information to remain confidential in certain circumstances, some Tribes we spoke with were either unaware of it or found it insufficient. NPS has taken some steps to communicate that the location information of National Register listings can be withheld in some cases but has not conducted outreach on this issue.
- We recommend that NPS develop a plan for updating its guidance that includes identifying stakeholder needs and steps to enhance the accessibility of guidance to the public. We also recommend that NPS conduct outreach to Tribes on nominating properties under its criteria for cultural sites and to clarify its policy on the confidentiality of National Register locations. Interior generally concurred with our recommendations to NPS.

What is the National Register of Historic Places?

The National Register was established by the National Historic Preservation Act of 1966, as amended (NHPA).¹ The act authorizes the Secretary of the Interior to maintain a National Register of historic properties significant in American history, architecture, archeology, engineering, and culture. The NHPA also requires the Secretary to establish criteria to evaluate properties for inclusion on the National Register and issue regulations for nominating properties for inclusion, among other things.² Within the Department of the Interior, NPS is responsible for administering the National Register, in cooperation with states, Tribes, and territories.

Under the NHPA, each state has established a State Historic Preservation Officer (SHPO).³ These officials have a variety of responsibilities, including identifying and nominating eligible properties to the National Register. Additionally, Tribes may elect to establish a Tribal Historic Preservation Officer (THPO), who can assume responsibilities from the SHPO with respect to their tribal lands, including nominating properties to the National Register.⁴

According to an NPS document, nearly every county in the U.S. has at least one property on the National Register. The NHPA establishes five types of historic places that can be included in the National Register. These types are defined in NPS regulations and guidance:

- **Buildings.** Structures created to shelter any form of human activity, such as houses, barns, churches, hotels, or similar structures. Buildings may also refer to a historically related complex, such as a house and barn.⁵
- **Objects.** Material things of functional, aesthetic, cultural, historical, or scientific value, such as fountains, statues, or monuments.⁶ According to NPS guidance, these are generally constructed objects that are artistic in nature.
- **Sites.** Locations of significant events; prehistoric or historic occupations or activities; or buildings or structures—whether standing or ruined—where the location itself has historical or archaeological value regardless of the value of the existing structure.⁷ These include properties such as battlefields, ceremonial sites, and ruins of historic buildings. For example, Snoqualmie Falls in Washington is listed for its historic significance to the cultural heritage of the Snoqualmie Indians (see fig. 2).
- **Districts.** Geographically definable areas with a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development.⁸ Examples include college campuses and historic residential neighborhoods.
- **Structures.** Human-made works composed of interdependent and interrelated parts in a definite pattern of organization.⁹ These are generally works used for purposes other than human shelter, often large engineering projects. Examples include highways, dams, and bridges.

Figure 2: Snoqualmie Falls, a National Register of Historic Places Site in Washington



Source: GAO. | GAO-26-107879

What are the benefits of being listed on the National Register?

Having a property listed on the National Register may offer the following benefits:

Tax credits. Certain tax provisions may apply to properties listed on the National Register. For example, the Federal Historic Preservation Tax Incentives program encourages the rehabilitation of historic buildings through a 20 percent tax credit.¹⁰ According to an NPS publication, the agency approves about 1,200 of these projects annually, and these tax credits incentivize nearly \$6 billion annually in private investment in the rehabilitation of historic buildings.¹¹ According to U.S. Treasury tax expenditures estimates, tax incentives for the preservation of historic structures cost \$590 million in fiscal year 2025.¹² Properties listed on the National Register may also be eligible for state-level tax credit programs.

Grants. National Register listing makes property owners eligible for certain competitive federal grants funded through the Historic Preservation Fund (HPF).¹³ For example, NPS uses the HPF to fund the Save America's Treasures

grant program, which awards grants for preserving properties listed on the National Register that are of national significance. NPS awarded a total of over \$552 million in HPF competitive grants between fiscal years 2015 and 2025, according to NPS officials. National Register-listed properties may also be eligible for state and nonprofit grants.

Nonfinancial benefits. Some state and tribal officials we spoke with told us there may be nonfinancial benefits from having a property listed on the National Register, including increased tourism or awareness of the significance of the property.

Additionally, when a property is listed on the National Register, federal agencies must comply with section 106 of the NHPA in certain circumstances.¹⁴ Under section 106, federal agencies must take into account the effects of their undertakings—which include a variety of actions ranging from funding highway construction to erecting a monument—on properties listed on the National Register. Specifically, under section 106, federal agencies are to assess the effects of the undertaking on the property and seek ways to avoid, minimize, or mitigate any adverse effects to the property in consultation with Tribes, SHPOs, THPOs, and other interested parties.¹⁵

Officials with the National Conference of State Historic Preservation Officers (NCSHPO) and the nine SHPO offices told us there are some common misconceptions about the benefits of National Register listing.¹⁶ For example, there is a belief that listing a property could restrict how it could be used or protect it from being demolished. However, listing a private property on the National Register does not prohibit under federal law or regulation any actions that may otherwise be taken by the property owner.¹⁷ Similarly, there are no federal protective benefits from listing. National Register properties can be bought, sold, torn down, repainted, or otherwise treated as other real property in most cases.¹⁸

What criteria determine a property's eligibility to be listed on the National Register?

A property must meet at least one of four criteria to be eligible for listing on the National Register: (A) association with a historic event; (B) association with a historic person; (C) representative of a specific style or a masterwork; or (D) historical or prehistorical information value. See figure 3 for more specific information on each of the criteria, which are contained in a regulation issued by NPS.¹⁹

Figure 3: National Register of Historic Places Criteria for Evaluation

Properties must satisfy at least one of the following criteria to be eligible for the National Register:		
Criterion	Regulatory description ^a	Example
A: Historic event	Associated with "events that have made a significant contribution to the broad patterns of our history."	The Montgomery Greyhound Bus Station in Montgomery, Alabama. On May 20, 1961, the Freedom Riders—a multiracial group protesting segregation—were attacked by a mob at this location. This event changed the course of the African American civil rights movement and social history in the U.S. by focusing nationwide attention on interstate travel desegregation and the greater civil rights struggle in the South.
B: Historic person	"Associated with the lives of persons significant in our past."	Walden Pond, in Concord and Lincoln, Massachusetts. American poet Henry David Thoreau spent 2 years residing in a cabin on the shore of the pond, where he kept a journal that would form the basis of his book <i>Walden, or Life in the Woods</i> .
C: Representative of a style or a masterwork	Demonstrates "the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction."	The San José de Gracia Church in Las Trampas, New Mexico. This church was listed as a well-preserved example of Spanish Colonial pueblo churches built in New Mexico.
D: Historical or prehistorical information value	"Have yielded, or may be likely to yield, information important in prehistory or history."	The Wade Archaeological Site in Randolph, Virginia. This is a well-preserved site of a Native American village dating to approximately AD 1000-1450, likely inhabited by ancestors of the Saponi Indians. The site contains artifacts and evidence of human burials.

Sources: GAO summary of National Park Service regulations, guidance, and individual site listing documentation. | GAO-26-107897

Accessible Data for Figure 3: National Register of Historic Places Criteria for Evaluation

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B: Historic person	"Associated with the lives of persons significant in our past."	Walden Pond, in Concord and Lincoln, Massachusetts. American poet Henry David Thoreau spent 2 years residing in a cabin on the shore of the pond, where he kept a journal that would form the basis of his book <i>Walden, or Life in the Woods</i> .
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^a36 C.F.R. § 60.4.

Each property must meet at least one criterion to be listed, but the majority of properties are listed under multiple criteria, according to NPS officials. For example, the Vernon School, a historic school in Kansas City, Kansas, is listed under three of the four criteria (see fig. 4).

Figure 4: The Vernon School in Kansas



Criterion A: Association with a historic event

This school is associated with the education of African American children prior to the *Brown v. Board of Education* decision.

Criterion B: Association with a historic person

The school is associated with the Bishop William Tecumseh Vernon who—among other things—served as President of Western University.

Criterion C: Representative of a style or masterwork

The building's architectural style represents the minimalized Art Deco style typical of architecture from the Works Progress Administration during the late 1930s and early 1940s.

Sources: The Vernon School National Register of Historic Places nomination; Kansas State Historic Preservation Office (photo). | GAO-26-107879

Accessible Text for Figure 4: The Vernon School in Kansas

Criterion A: Association with a historic event	Criterion B: Association with a historic person	Criterion C: Representative of a style or masterwork
This school is associated with the education of African American children prior to the Brown v. Board of Education decision.	The school is associated with the Bishop William Tecumseh Vernon who—among other things—served as President of Western University.	The building's architectural style represents the minimalized Art Deco style typical of architecture from the Works Progress Administration during the late 1930s and early 1940s.

Sources: Sources: The Vernon School National Register of Historic Places nomination; Kansas State Historic Preservation Office (photo). | GAO-26-107879

In addition to meeting at least one of the listing criteria that provides historic context, a property must also retain integrity—the ability to convey its historic significance. NPS defines integrity as seven unique aspects, including integrity of location, design, and materials.²⁰ In order to be eligible, a property must demonstrate several, and usually most, of these aspects of integrity, according to NPS guidance. See figure 5 for an example of how the seven aspects of integrity were applied to the Royal Theater in Guadalupe, California—a National Register property listed in 2022.

Figure 5: Example of a National Register Property Demonstrating the Seven Aspects of Integrity



Source: GAO analysis and Carole Denardo (photo). | GAO-26-107879

Accessible Text for Figure 5: Example of a National Register Property Demonstrating the Seven Aspects of Integrity

1. Design – The building retains features representing modernistic design as constructed in the late 1930s, including use of smooth stucco wall cladding and an Art Deco marquee.
2. Materials – Most of the original building materials are evident and unchanged.
3. Workmanship – The building displays good workmanship, particularly in regard to the decorative elements.
4. Association – “Association” refers to the link between the property and its historic significance. Community members still associate the building with its past as a movie theater and venue for events—the marquee still serves as a billboard for community events.
5. Feeling – “Feeling” refers to a property’s expression of the aesthetic or historic sense of a particular time period. There are few alterations or removals of original features. As such, the building still conveys the feeling of an earlier era and aesthetic.
6. Location – The theater remains in its original location.
7. Setting – The setting changed little since the theater’s construction—little new development has occurred nearby.

Source: GAO analysis and Carole Denardo (photo). | GAO-26-107879

In addition, NPS regulations state that certain types of properties are generally ineligible for the National Register, including religious properties, birthplaces and graves of historical figures, cemeteries, and properties achieving significance within the last 50 years.²¹ However, these properties may be eligible under certain circumstances outlined in NPS regulations and guidance.²²

What is the process to list a property on the National Register?

A nomination to the National Register can originate from a variety of individuals or groups, including property owners, preservation organizations, or local or state government agencies. Nomination forms are submitted to the relevant SHPO or THPO. SHPOs and THPOs review the nomination and work with the nominator to ensure the nomination provides sufficient information for NPS to evaluate the historic significance of the property.

Once the proposed nomination is completed, the SHPO or THPO notifies affected property owners and local governments and solicits public comment on the nomination. If the owner (or a majority of owners, if there are multiple owners) objects to nominating a property, the property cannot be listed.²³

Nominations are then reviewed by the state’s or Tribe’s National Register Review Board, as applicable, and a recommendation is made as to whether the board believes the nomination should be approved or disapproved. After the relevant board’s recommendation, the SHPO or THPO determines whether the nomination will be sent to NPS for its review. Once NPS receives a nomination, the Keeper of the National Register evaluates the nomination based on the eligibility criteria and either accepts, rejects, or returns the nomination with a request for revisions or more information. NPS has also delegated these Keeper authorities to NPS staff reviewers, who are each assigned a geographic region, according to NPS officials. NPS officials told us that reviewers routinely provide guidance and address questions from SHPOs and THPOs regarding the preparation of a nomination to better ensure nominations contain adequate documentation before submission to NPS. As a result of this regular and ongoing

communication, NPS officials told us the majority of nominations are accepted once they reach NPS.

What challenges do selected SHPOs experience with the National Register process?

NCSHPO and a nonrepresentative group of officials from nine SHPO offices we spoke with identified a number of challenges SHPOs face when nominating properties to the National Register.

Outdated or insufficient guidance

NCSHPO and officials from eight of the nine SHPO offices stated that some key NPS guidance documents for developing and submitting nominations were outdated. For example, officials from seven SHPO offices cited NPS Bulletin 16A on how to complete a National Register nomination form as guidance that would benefit from an update. This bulletin was last updated in 1997. In 2023, NCSHPO issued a comprehensive report on challenges with the National Register program. This report made several recommendations to improve the program, including updating the program's guidance.²⁴

Further, officials from six SHPO offices highlighted other areas in which they would like additional guidance. For example, officials from one SHPO office said their office needed more guidance on assessing the integrity of certain types of properties, and officials from another office told us it would be helpful to have additional guidance on classifying post-World War II architectural styles (see fig. 6). The 2023 NCSHPO report also recommended adding guidance on cultural landscapes and expanding existing guidance for assessing the integrity of properties.

Figure 6: Home in the Whitesburg Estates Historic District in Alabama, Listed for Its Post-World War II Architectural Style



Source: Courtesy of Alabama Historical Commission. | GAO-26-107879

Officials from six SHPO offices said that, as a result of out-of-date or insufficient guidance, nominations may take more time and resources. For example, officials from one SHPO office told us these issues with the guidance result in more back-and-forth between nominators and SHPO staff during the review process. Additionally, officials from five of these SHPO offices said updated guidance could better reflect what NPS reviewers expected from nominations, and three said it could lead to greater consistency among NPS reviewers.

NPS officials told us they intend to update some guidance documents, including Bulletins 15 and 16A, but had not yet developed a plan or timeline for doing so. Officials told us they welcome informal feedback from SHPOs as well as THPOs, who also use this guidance. However, they do not have a plan to formally engage with SHPOs or THPOs early in the revision process to identify the information they need. NPS officials told us they solicited feedback from some SHPOs about what information should be added to some guidance as part of a historic preservation conference in 2023, and that they would include SHPOs and THPOs in the public comment process when revising the guidance. However, formally engaging with SHPOs and THPOs early in the guidance revision process could help NPS better understand their information needs.

Federal internal control standards state that management should design a process to identify information requirements to achieve its goals. In developing these information requirements, management should consider the expectations of both internal and external users.²⁵ Developing a plan to update National Register guidance documents that includes engaging with SHPOs and THPOs early in the process to identify their information needs will help NPS ensure its revision is current and complete and that the revised guidance includes the information its primary users need to effectively participate in the program.

Perception of increasingly strict nomination review by NPS

NCSHPO and officials from six of the nine SHPO offices stated that an increase in the quantity and detail of information NPS expects of National Register nominations is a challenge to participating in the program. Specifically, these officials told us that NPS has increased its standards for the quantity and detail of information, which has resulted in additional work for SHPOs. Additionally, officials from one SHPO office told us they have had to delay reviewing some nominations submitted by individuals who did not have assistance from a consultant because helping develop these nominations is more time-consuming.

NPS officials told us their standards for the quantity of information and the level of detail required for nominations have not changed. However, these officials said the perception among some SHPO officials that there has been an increase in evidence required may be caused, in part, by an increase in nominations of properties that reached historical significance more recently. According to these officials, such properties may require more work to nominate than older properties because nominators have fewer examples of similar properties to draw from when developing a nomination.

Limited resources

Officials from five SHPO offices said that current funding levels prevented them from hiring enough staff to effectively review nominations. Additionally, officials from one SHPO office told us limited resources may limit their ability to help nonprofessional preparers, who may not have the capacity to produce a complete nomination without assistance.

SHPOs receive grant funding from the HPF, which is funded by revenues from certain oil and gas leases and other sources rather than tax dollars. HPF grants to SHPOs are used to fund a variety of historic preservation responsibilities under the NHPA, including developing and submitting National Register nominations. The grant amounts each SHPO receives are determined by a formula that considers the state's geographic size, population, and number of historic residences, among other things.²⁶

In its report, NCSHPO recommended dedicated funding for SHPOs to, among other things, focus on National Register nominations. NPS officials told us they were aware of SHPO concerns about resources and noted that there are additional competitive grants funded through the HPF that can help fund National Register activities. For example, the African American Civil Rights grant can be used to support research for relevant National Register nominations.

What challenges do selected Tribes experience with the National Register process?

The National Association of Tribal Historic Preservation Officers (NATHPO) and a nonrepresentative selection of officials from eight Tribes we spoke with, including those with and without THPOs, identified a number of challenges that Tribes face with the National Register process.

Criteria that do not align with tribal views on historic significance

The 2023 NCSHPO report, officials with NATHPO, and officials from four of the eight Tribes said that the current National Register criteria did not always accommodate historic locations significant to Tribes. These Tribes and stakeholders presented a variety of reasons why this may be the case. For example:

- The NCSHPO report highlights that demonstrating the integrity of sites under the criteria for evaluation favors structures and may be difficult to apply to cultural landscapes significant to Tribes. Further, the report notes that concepts key to evaluating properties under the criteria, such as “boundaries” and “ownership” are not used in the same way by Tribes as in Western culture.
- Officials from NATHPO told us the National Register criteria do not align with how Tribes consider their history and that nominating tribal properties to the National Register feels like “fitting a square peg in a round hole.”
- Officials from two other Tribes told us the criteria emphasize the importance of individuals, which is generally not how their Tribes frame their histories.

NPS officials told us they are aware of these tribal views and that they have taken actions to clarify the ways in which Tribes can apply the criteria to locations significant to them. For example, officials told us criterion A, which recognizes properties associated with historic events, can be applied to some sites of tribal significance. De'ek Wadápúsh, or Cave Rock, a site sacred to the Washoe Tribe of Nevada and California, is listed under criterion A for its traditional cultural value to the Tribe (see fig. 7).

Figure 7: De'ek Wadápúsh – Cave Rock, a National Register Site Listed Under Criterion A for Its Traditional Cultural Value to the Washoe Tribe of Nevada and California



Source: PixHound/stock.adobe.com. | GAO-26-107879

NPS officials told us they emphasized how criterion A can be applied to cultural properties in a recently revised Traditional Cultural Places bulletin and that they published a best practices publication on the topic in January 2024.²⁷ However, NPS officials also told us they generally have fewer interactions with Tribes than with SHPOs and do not provide routine training on the program unless specifically requested by a Tribe.

The NHPA establishes the National Register as a list of properties significant in American history, architecture, archaeology, engineering, and culture and provides that properties of cultural importance to Tribes are eligible for inclusion.²⁸ In addition, NPS documents state that the National Register should include properties that reflect tribal history. Federal standards for internal control state that management should communicate relevant and quality information externally to help achieve program objectives. These standards define quality information as being, among other things, appropriate, accessible, and complete.

While NPS has published guidance on applying the criteria to cultural sites, there are opportunities for this information to be communicated more effectively to Tribes. For example, officials from NATHPO told us they believe it is NPS's responsibility to convene Tribes and solicit their feedback on how to remedy the issue of criteria not being sufficiently inclusive of Tribes. Additionally, GAO has reported that some agencies have increased regional outreach to Tribes and built relationships with them to improve the agencies' ability to work with Tribes and respect tribal approaches.²⁹

Conducting outreach to Tribes and THPOs to highlight relevant guidance and explain how properties of tribal significance can be nominated under the National Register criteria for evaluation could provide better assurance that the National Register includes historic properties of cultural importance to Tribes.

Concern over location confidentiality

The 2023 NCSHPO report and officials from seven of the eight Tribes had concerns about the confidentiality of sites nominated to the National Register. The NCSHPO report highlighted Tribes' concern that listing properties could bring unwanted attention, visitation, and vandalism to sacred places. Officials from seven of the eight Tribes we spoke with expressed similar concerns. Specifically, they were concerned that publishing site locations in the National Register could put sites at risk, including for unwanted visitation or looting. As a result of confidentiality concerns, officials with five Tribes we spoke with were reluctant to nominate properties to the National Register.

The NHPA allows for the location of properties on the National Register to be withheld from public disclosure in certain circumstances.³⁰ Specifically, location information may be withheld if NPS determines that disclosure may cause a significant invasion of privacy, risk harm to the property, or impede the use of a traditional religious site. NPS officials told us they are committed to ensuring this information is withheld as requested. National Register regulations and NPS guidance documents include information on this provision. However, some Tribes we spoke with were unaware of this provision or had concerns about sharing information about sites. Specifically, of the eight Tribes we spoke with, officials from two Tribes were unaware of the provision allowing the locations of properties to be withheld, and officials from four other Tribes told us that while they were aware of this provision, they continued to have concerns about sharing information about historic properties. For example, officials from one Tribe wanted to know what security measures protect the database that contains redacted locations. NPS officials told us they were aware that some Tribes are unclear on how information can be withheld from the public. Officials told us there has not been recent outreach to Tribes on this issue, but that they would like to conduct such outreach.

The NHPA establishes the National Register as a list of properties significant in American history, architecture, archaeology, engineering, and culture and provides that properties of cultural importance to Tribes are eligible for inclusion. Federal standards for internal control state that management should communicate relevant and quality information externally to help achieve objectives. These standards define quality information as being, among other things, appropriate, accessible, and complete.

NPS has taken productive steps to communicate that location information of National Register listings can be withheld in some cases. However, conducting additional outreach to Tribes on the ability to withhold information from the public about the locations of properties on the National Register would better ensure Tribes are informed of this provision and may mitigate continuing concerns among Tribes about sharing information about their historic properties.

Challenges arising from historic displacement from ancestral homelands

Officials from three Tribes told us that displacement from their ancestral homelands leads to additional challenges. For example, two Tribes told us their ancestral homelands cross multiple state lines and that it is challenging to nominate sites through multiple SHPOs. Further, they told us these SHPOs may be unaware of their Tribe's history. Additionally, one Tribe discussed the financial difficulties of traveling frequently to ancestral homelands for site evaluation.

High level of documentation required for nominations

NATHPO and officials from three of the eight Tribes told us the amount of documentation required to complete a nomination is a challenge. Further, officials from five of the eight Tribes told us preparing nominations requires hiring

outside archeologists and consultants. Additionally, officials from NATHPO and four of eight Tribes said tribal history is often oral, which may make it difficult for nominators to produce the needed written documentation for a nomination.

NPS officials told us they had heard this feedback from THPOs and Tribes during the comment period for the Traditional Cultural Places guidance revision. In response, officials ensured this guidance was clear on documentation requirements, including that nominations should adequately describe a property's significance and its integrity, but do not need to be lengthy. These officials also said the guidance reinforces that oral histories are recognized sources for information in National Register nominations.

Limited resources

Similar to the views of SHPOs, officials with NATHPO and four of the eight Tribes said that limited resources are a challenge. For example, one tribal official explained that they had to temporarily designate the Tribe's secretary as the THPO because they did not have the funding to hire staff to serve as the THPO full time.

Like SHPOs, THPOs receive grants funded by the HPF, and the amount each THPO receives is determined by a formula, with most of the appropriation for THPO grants divided equally among all eligible THPOs.³¹ NATHPO officials told us the increasing number of THPOs that have been added in recent years has exacerbated resource constraints since HPF THPO grant apportionments are divided among a larger group. According to NPS officials, there were 235 approved THPOs in 2025, of which 43 of which had been approved and became eligible for HPF THPO grants since 2019.

What challenges does the public experience with the National Register process?

NCSHPO and officials from eight of the nine SHPO offices told us members of the public face challenges to nominating sites to the National Register. Officials from these eight SHPO offices said the level of scholarship and work currently required to develop a nomination is beyond the ability of a typical person without assistance from a consultant or significant involvement from the SHPO.³² Further, three of these SHPOs told us they were limited in their capacity to help the public with their nominations. NCSHPO's 2023 report includes similar findings, noting that panelists they interviewed viewed the National Register listing process to be "so byzantine and cumbersome" that professional assistance is necessary to complete a nomination.

A potential cause of these challenges is difficulty understanding NPS's guidance. Officials from NCSHPO and seven of the nine SHPO offices told us NPS's guidance is challenging to understand. For example, officials with one SHPO office told us that many individuals did not pursue nominating sites because they did not understand the guidance. Officials with another office told us the guidance documents are written using academic language and tailored for historic preservation professionals. NPS officials told us they would like the program to be accessible and that they would consider plain language guidelines when updating guidance. However, as previously noted, NPS has not developed a plan for updating its guidance.

The National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources, and NPS guidance specifies that any person may

prepare a National Register nomination. Federal standards for internal control state that management should communicate quality information externally through reporting lines so that external parties can help the agency achieve its objectives.³³ These standards define quality information as, among other things, current and accessible.

Without guidance that is written in a way that is accessible to the public, some individuals or groups interested in nominating properties may face challenges in doing so, potentially limiting the ability of the National Register to serve as a definitive list of places worth protecting. Additionally, it could lead to members of the public drafting incomplete or insufficient nominations, which will likely result in greater workloads for SHPOs.

Conclusions

The National Register of Historic Places officially recognizes properties significant in American history, and its listings contribute to an understanding of the historical and cultural foundations of the nation. To accomplish this goal, the process of nominating properties needs to be clear and accessible. However, officials from SHPO offices and Tribes we spoke with highlighted some challenges to participating in the program. For example, SHPOs cited challenges with out-of-date or insufficient guidance on how to nominate a property to the National Register. While NPS officials told us they intend to update their guidance, they have not developed a plan for doing so, including strategies to identify the information that SHPOs and THPOs need to effectively participate in the program. Developing a plan, including a process to identify the information needed by SHPOs and THPOs, will ensure the guidance is effective for its primary users, allowing them to efficiently develop National Register nominations.

SHPO officials also told us members of the public face challenges to nominating properties to the National Register. Namely, the program can be inaccessible to typical people without significant assistance, either from a paid consultant or substantial involvement from the relevant SHPO or THPO, who may be limited in their capacity to help, given resource constraints. One aspect of this inaccessibility is guidance that may be challenging for the public to understand. As NPS develops a plan to update its National Register nomination guidance, including measures to make it more accessible to the public will better ensure the public can effectively participate in the program.

THPOs and Tribes also noted challenges to participating in the program, including that the criteria for evaluating nominations may not always accommodate tribal historic properties and that publishing the locations of tribal properties could put them at risk of being damaged. NPS has taken steps to address both issues; however, some Tribes continue to be reluctant to nominate properties due to these challenges. Conducting outreach to Tribes to clarify how the criteria can be applied to tribal properties and how the locations of properties can be withheld from the public could help mitigate some Tribes' reluctance to nominate properties.

Recommendations for executive action

We are making four recommendations to the Department of the Interior. Specifically:

The Secretary of the Interior should ensure NPS develops a plan to update its guidance for developing and submitting nominations to the National Register that

includes identifying the information that SHPOs and THPOs need in guidance to effectively participate in the program. (Recommendation 1)

The Secretary of the Interior should ensure NPS includes steps to enhance the accessibility of its National Register guidance to the public as a part of its plan to revise its guidance. (Recommendation 2)

The Secretary of the Interior should ensure NPS conducts outreach to Tribes and THPOs to inform Tribes how properties of tribal significance can be included under the National Register criteria for evaluation, including use of the Traditional Cultural Places bulletin and the best practices update on using criterion A. (Recommendation 3)

The Secretary of the Interior should ensure NPS conducts outreach to Tribes to clarify NPS's policies and processes for withholding National Register property locations from the public. (Recommendation 4)

Agency Comments

We provided a draft of this report to the Department of the Interior for review and comment. Interior commented via email that it generally concurs with our recommendations to NPS. NPS provided technical comments, which we incorporated as appropriate.

How GAO Did This Study

We reviewed relevant laws and regulations that establish and govern the National Register of Historic Places, including the National Historic Preservation Act of 1966, as amended. We reviewed documentation and interviewed officials from NPS who administer the program, including the Keeper of the National Register and nomination reviewers. The documents we reviewed include guidance documents to facilitate the development and submission of National Register nominations, including Bulletin 15, which explains the National Register criteria for evaluation and guides their application, and Bulletin 16A, which describes how to complete the National Register nomination form. We also reviewed best practices review guidance documents that NPS has issued as a supplement to guidance bulletins, including one published in January 2024 on nominating properties of cultural significance.

To describe challenges SHPOs face with the National Register process, we interviewed officials from a nonrepresentative selection of SHPO offices from eight states and one territory. These SHPO offices provided examples of the challenges they face, but these challenges cannot be generalized to represent SHPOs broadly. We selected these SHPO offices to reflect states that varied in the number of National Register properties listed and HPF SHPO grants received for the period of fiscal years 2019 through 2024, the most recent 5-year period for which this information was available. We also selected states to reflect geographic diversity. Additionally, we reviewed NCSHPO's 2023 report on recommendations for improving recognition of historic places and interviewed officials from the organization.

To describe challenges Tribes face with the National Register process, we interviewed officials from a nonrepresentative selection of eight federally recognized Tribes. These Tribes provided examples of the challenges they face, but these challenges cannot be generalized to represent Tribes or THPOs broadly. Our selection included Tribes with and without NPS-approved THPOs. For Tribes with THPOs, we selected Tribes that varied in the number of sites

they had listed on the National Register and THPO grant funding they had received from the HPF for the period of fiscal years 2019 through 2024, the most recent 5-year period. We also selected Tribes to reflect geographic diversity. Additionally, we interviewed officials from NATHPO and reviewed documents from the organization, including comments on a proposed NPS guidance revision. Further, we reviewed relevant portions of the 2023 NCSHPO report regarding challenges Tribes reported with the National Register process.

We conducted this performance audit from October 2024 to August 2026 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

List of Addressees

The Honorable Jared Huffman
Ranking Member
Committee on Natural Resources
House of Representatives

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of the Interior, and other interested parties. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov/>.

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Endnotes

¹Pub. L. No. 89-665, § 101(a)(1), 80 Stat. 915 (codified as amended at 54 U.S.C. § 302101).

²54 U.S.C. § 302103(1), (2)(A).

³In addition to the 50 states, the District of Columbia, U.S. territories, and freely associated states also have SHPOs, for a total of 59 SHPOs.

⁴54 U.S.C. § 302702. The NHPA defines “Indian tribe as an Indian tribe, band, nation, or other organized group or community, including a Native village, regional corporation or village corporation (as those terms are defined in section 3 of the Alaska Native Claims Settlement Act), that is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.” 54 U.S.C. § 300309. The NHPA defines tribal land as all land within the exterior boundaries of any Indian reservation and all dependent Indian communities. 54 U.S.C. § 300319. There are also Federal Preservation Officers in federal agencies who are responsible for the nomination of properties under their agency’s ownership or control, among other things.

⁵36 C.F.R. § 60.3(a).

⁶36 C.F.R. § 60.3(j). Objects may be, by nature or design, movable yet related to a specific setting or environment, such as a steamboat or dredge.

⁷36 C.F.R. § 60.3(f).

⁸36 C.F.R. § 60.3(d). A district may also comprise individual elements separated geographically but linked by association or history.

⁹36 C.F.R. § 60.3(p).

¹⁰Properties listed on the National Register individually or located in a listed historic district and certified by the Secretary of the Interior as being of historic significance to the district are eligible for this program. 26 U.S.C. § 47(c)(3)(A).

¹¹“Historic Preservation Tax Incentives: About the Incentives,” National Park Service, accessed May 6, 2026, <https://www.nps.gov/subjects/taxincentives/about.htm>.

¹²U.S. Department of the Treasury, Office of Tax Analysis, *Tax Expenditures Fiscal Year 2027* (Dec. 16, 2025), 24.

¹³The Historic Preservation Fund is a fund in the Treasury that was established by statute and receives deposits of revenues from leases on the outer continental shelf and money accruing to the United States from lands in the naval petroleum reserves. 54 U.S.C. §§ 303101-303102. Owners of properties determined eligible for the National Register but not listed on it are also eligible for some federal historic preservation grant programs, such as the Paul Bruhn Historic Revitalization Grant program.

¹⁴54 U.S.C. § 306108. An undertaking is a project, activity, or program that is funded in whole or in part by a federal agency and under the agency’s direct or indirect jurisdiction, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; and those requiring a federal permit, license, or approval. 54 U.S.C. § 300320; 36 C.F.R. § 800.16(y).

¹⁵See 36 C.F.R. § 800.1(a). Interested parties include local governments with jurisdiction over the area in which the effects of an undertaking may occur; the applicant for federal assistance, permit, license, or approval; and others with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking’s effects on historic properties.

¹⁶We selected SHPOs to speak with on the basis of number of properties listed since 2019, varying resource levels between fiscal years 2019 and 2024, and geographic diversity to gather the perspectives of SHPOs on challenges they face.

¹⁷36 C.F.R. § 60.2.

¹⁸While listing on the National Register does not provide restrictions on how a property can be used, accepting a historic preservation grant or using a historic preservation tax credit may impose conditions and requirements on property owners. In addition, historic properties listed on the National Register may be subject to restrictions imposed under state or local laws.

¹⁹36 C.F.R. § 60.4.

²⁰See *id.* The seven aspects of integrity are design, materials, workmanship, association, feeling, location, and setting.

²¹*Id.*

²²Each category of excepted property has its own explanation as to why it is not generally considered for the National Register and specific situations in which it may be permitted for consideration for the National Register.

²³While owner objection will prevent a property from being listed on the National Register, it is still forwarded to the National Park Service for a determination of eligibility. A determination of eligibility means that agencies must comply with section 106 of the NHPA, including its consultation requirements, when their undertakings may affect the property.

²⁴National Conference of State Historic Preservation Officers, *A Report of the National Historic Designation Advisory Committee: Recommendation for Improving the Recognition of Historic Properties of Importance to All Americans* (April 2023).

²⁵GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

²⁶The HPF appropriation for SHPO grants is apportioned using a formula. After a percentage of the appropriations is apportioned to the Freely Associated States, a base amount of \$400,000 is allocated to each SHPO. The formula then considers census data on acreage, population, and number of residential structures over 50 years old. Fifty percent of any appropriations over \$65 million is apportioned to states with Certified Local Government Partners, who must receive the funds, and fifty percent is apportioned among all SHPOs. The apportionment formula was updated in 2022 and currently uses 2020 census data for the calculations.

²⁷National Park Service, *Identifying, Evaluating, and Documenting Traditional Cultural Places National Register Bulletin* (2024); and *Nominating Properties for Cultural Significance under Criterion A*, Best Practices Review Issue 6, (Washington, D.C.: 2024).

²⁸54 U.S.C. §§ 302101, 302706(a). Properties of traditional religious importance to Tribes are also eligible.

²⁹GAO, *Tribal Issues: Barriers to Access to Federal Assistance*, [GAO-25-107674](#) (Washington, D.C.: December 2024).

³⁰54 U.S.C. § 307103(a). In addition to location information, the NHPA provides for withholding from public disclosure information about a historic property’s character or ownership if disclosure would cause a significant invasion of privacy, risk harm to the historic property, or impede the use of a traditional religious site by practitioners.

³¹In apportioning the HPF appropriation for THPO grants, approximately 80 percent of the apportionment is divided equally among all eligible THPOs, and the remaining 20 percent is apportioned based on the area of tribal lands as defined by the NHPA.

³²NPS regulations require nomination forms to be adequately documented and technically and professionally correct and sufficient. In addition, the regulations require descriptions and statements of significance to be prepared in accord with standards generally accepted by academic historians, architectural historians, and archeologists. The nominating authority, such as SHPOs and THPOs, certifies that the nomination is adequately documented and technically and professionally correct and sufficient upon nomination. 36 C.F.R. § 60.3(i).

³³GAO-14-704G.