



Preliminary Determinations of Significance — Part 1 Application Documentation Requirements

The Historic Preservation Certification Application (HPCA) Part 1, Evaluation of Significance, is used to evaluate the significance of a historic building and whether it may qualify as a “certified historic structure.” Part 1 applications may be used either to request **certification** that a building contributes to the significance of an existing registered historic district or an already-listed National Register property with more than one building, and is thus a “certified historic structure”; or to request a **preliminary determination** of significance, as further discussed below.

This additional information supplements the [HPCA Instructions](#) (see page 7, Special Considerations — Part 1 — Preliminary determinations) regarding the Part 1 application documentation requirements and only applies to requests for preliminary determinations of significance. This information is intended to simplify submission requirements and the amount of documentation required for the purposes of these submissions.

Part 1 applications may be used to 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 would contribute to the significance of the district if the period or area of significance was expanded.

If a building is neither within a registered historic district nor individually listed in the National Register, the applicant must submit a Part 1 application to request a preliminary determination of significance and begin the separate process of requesting the State Historic Preservation Office (SHPO) to nominate the building or the district to the National Register. While often referred to as “PDILs” (Preliminary Determinations of Individual Listing) for this reason, preliminary determination requests can also be for buildings that are outside the period or area of significance, or the current boundaries, of an existing National Register-listed historic district or National Register-listed property. Preliminary determinations are not binding upon the NPS or the SHPOs and become final only when the building or district is listed in the National Register or when additional documentation for an existing listing is accepted.

Introduction: Preliminary Determinations of Significance and the Regulatory Framework

Part 1 applications requesting preliminary determinations of significance are guided by National Park Service (NPS) regulations at [Historic Preservation Certifications Under The Internal Revenue Code \(36 CFR Part 67\)](#) and evaluated using [National Register of Historic Places Criteria \(36 CFR Part 60\)](#). Part 1 applications for buildings in potential historic districts—or for buildings that are outside the

period or area of significance or the current boundaries of a National Register-listed district—are further evaluated using NPS regulations at [Standards for Evaluating Significance within Registered Historic Districts \(36 CFR 67.5\)](#).

Part 1 applications requesting preliminary determinations “must contain substantially the same level of documentation as National Register nominations, as specified in 36 CFR Part 60” (36 CFR 67.4(f)) and as further provided in National Register Bulletins [How to Apply the National Register Criteria for Evaluation](#) and [How to Complete the National Register Evaluation Form](#).

“Substantially” does not necessarily mean “long”: the current appearance, historic significance, and physical integrity may typically be addressed in less than five pages.

The following information describes what constitutes “substantially the same level of documentation,” addressing what documentation must be provided as part of the Part 1 application and the level of documentation required in comparison to a National Register nomination, as well as how to write more concise physical descriptions and significance statements for both Part 1 applications and National Register nominations. The information below discusses the criteria, requirements, and terms (such as “significance,” “integrity,” and “period of significance”) as used by the National Register of Historic Places regulations (36 CFR Part 60). Links to additional information for the National Register program are included at the end of this document.

Addressing the Criteria for Listing on the National Register of Historic Places

Part 1 applications for preliminary determinations must show how the property meets the criteria for listing in the National Register:

- For a preliminary determination of **individual listing (PDIL)**, the application must describe the property’s physical appearance; document the property’s significance; and describe how the property retains the integrity that conveys that significance.
- For a building in a **potential historic district (PDHD)**, the application must identify the proposed boundaries and document the proposed district’s significance and integrity; the building’s physical appearance; how the building itself contributes to the significance of the district; and how the building retains the integrity that conveys that significance.
- For a building within a **potential boundary expansion** of a National Register-listed historic district, the application must identify the proposed boundaries and document the significance and integrity of the expanded area; the building’s physical appearance; how the building itself contributes to the significance of the expanded area; and how the building retains the integrity that conveys that significance.

- For a preliminary determination for a building in a National Register-listed historic district that is **outside the period or area of significance of the district**, the application must justify the expanded significance of the district; the building’s physical appearance; how the building itself contributes to the expanded significance of the district and how the building retains the integrity that conveys that significance. **Alternatively, an application for a building outside a National Register-listed historic district’s period or area of significance but which independently meets the National Register criteria of significance and integrity may simply address how the building is individually eligible for listing.**

For approved preliminary determinations involving properties already listed in the National Register, the National Register listing will need to be amended to ensure the listing accurately reflects the property’s full significance, integrity, and resource count and status. For example, if an approved preliminary determination expands the period or area of significance of a historic district that was previously listed in the National Register, that listing must still be amended. Likewise, if a building within an existing National Register-listed historic district is preliminarily determined to independently meet National Register criteria for significance and integrity, that historic district nomination must still be amended to reflect that the building is now a contributing resource to the historic district because “it independently meets the National Register criteria” as provided in [National Register Bulletin: How to Complete the National Register Registration Form \(1997\)](#) (p. 16). Further guidance for amending listings is detailed in the National Register’s [Best Practices Review: Amending National Register Documentation \(2023\)](#).

Preliminary determinations do not constitute listing in the National Register, nor do they constitute certifications of significance as required by law for the Federal tax incentives. Preliminary determinations are not binding upon the NPS (or the SHPOs) and become final only when the building or district is listed in the National Register or, for buildings outside the period or area of significance of a registered historic district, when the additional documentation is accepted.

The applicant seeking certification for the tax incentives should coordinate with the SHPO or the NPS to ensure that the property is listed or that an existing listing is formally amended.

Documenting Preliminary Determinations of Significance in the Part 1 Application

The Part 1 application consists of the official cover sheet and a “Description of Physical Appearance” (Section 5), a “Statement of Significance” (Section 6), and an ownership statement (if applicable), photos, and a map (see HPCA Instructions, “Part 1-Evaluation of Significance”). Sections 5 and 6 of the Part 1 application roughly correspond to “Narrative [Physical] Description” (Section 7) and “Statement of Significance” (Section 8) of a National Register nomination, respectively.

As noted above, Part 1 applications for preliminary determinations of significance “must contain substantially the same level of documentation as National Register nominations” (36 CFR 67.4(f)). This documentation is not required to be submitted on a National Register Registration Form 10-900 (although draft nomination forms will be accepted in lieu of completing Sections 5 and 6 of the Part 1 application, if submitted with the application). Nevertheless, a Part 1 application must include the same substantive information typically provided in the corresponding sections of a National Register nomination to describe the property and document how it meets the criteria for listing.

Describing the Property’s Physical Appearance

The “Description of Physical Appearance” (Section 5) in the Part 1 application must provide a narrative physical description of the property comparable to the information provided in the corresponding section of the National Register form, including:

- a concise summary paragraph describing the property,
- an architectural description of the historical and current condition of the property,
- an evaluation of its historic integrity, describing any major changes or alterations over time,
- the category of property (i.e., a building or a district), and
- a count and a list of contributing and noncontributing buildings, structures, objects, and sites if the property contains more than one resource.

Part 1 decisions are based on a property’s pre-rehabilitation appearance and condition, and all Part 1 applications must document the property as it exists *prior to the start of rehabilitation*.

Documenting the Property’s Significance

The “Statement of Significance” (Section 6) in a Part 1 application must provide a narrative statement of significance of the property comparable to the information provided in the corresponding section of the National Register form, including a concise and well-written *summary paragraph* on how the property meets the National Register criteria for listing. A good summary is typically one to three paragraphs and should include the following key information:

- National Register criteria,
- area(s) of significance,
- level(s) of significance,
- period(s) of significance, and
- any criteria considerations.

A good summary should always address *why* the property is significant for each area of significance and *why* the period of significance was selected.

The statement of significance must include sufficient information to evaluate the property’s significance and integrity within the context of the property’s history and its place within local, state, or national historic trends. As advised in [National Register Bulletin: How to Complete the National Register Registration Form \(1997\)](#):

- be selective about the facts you present: consider whether they directly support the significance of the property, and
- avoid narrating the entire history of the property: focus on the events, activities, or characteristics that make the property significant.

While a complete bibliography is not necessary for a Part 1 application, major sources and citations must be provided, particularly information that is important in supporting the historic context, key facts or dates, and property history. The Part 1 application must include a map or site plan of the property; a map of the historic district, if part of a listed or proposed district, with the location of the property highlighted; a boundary justification; and photographs along with a photo key. The [Historic Preservation Certification Application Instructions](#) provide details for preparing and submitting maps, photographs, and photo keys.

When Making Comparisons to Other Properties is Necessary to Demonstrate Significance

Significance may be better demonstrated when comparisons are made between the Part 1 application's property and similar properties. A comparative analysis provides a basis for understanding why the property is uniquely representative in comparison to other properties of the same level, area, and period of significance. A property that is presented as the "earliest" or "finest"—or any of the other superlatives—should include a comparison to other properties to support such conclusions. As provided in [National Register Bulletin: Applying the National Register Criteria for Evaluation](#), unless the property is the sole example of a property type that is significant in illustrating the historic context or it clearly possesses the defined characteristics required to strongly represent the context, comparison to similar properties in a community is necessary to support significance.

Understanding the Differences (and Similarities) Between Part 1 Applications and National Register Nominations

The narratives in the Part 1 application do not need to be 'letter-perfect.' Likewise, the documentation provided in these sections does not need to be as thorough as the documentation typically included in a National Register form. Nevertheless, the information must be factually accurate and substantially complete: the property's significance and integrity must be adequately documented to demonstrate that the property meets the criteria for listing in the National Register. If a property's significance and integrity are not adequately documented in the Part 1 application, the differences in the subsequent National Register nomination—for example, a different end date for the period of significance and/or different character-defining features and spaces—may impact the property's HPCA approvals because it can affect what is character-defining about the property and should be retained and preserved as part of the rehabilitation projects.

The documentation in the Part 1 application also does not need to be exhaustive or lengthy; for example, two to five single-spaced pages is typically adequate for many Part 1 applications. This has consistently been the case where the property is an individual building with simple physical characteristics or where the historic context is already well documented. Note that [National Register Multiple Property Documentation Forms](#) (MPDFs, or "covers") may

be available to provide context for specific building types or characteristics (e.g., Greek Revival, public housing) or important local or state historic events or trends (e.g., civil rights, manufacturing), reducing or eliminating the need for original research and helping speed the preparation of a Part 1 application or National Register nomination. However, more documentation may be required depending upon the size and complexity of the property and the number of resources; the extent to which alterations, additions, or loss have affected its integrity; and if it involves a new or unique historic context that is not well understood.

Physical Description: Part 1 Application vs. National Register Form

The physical description in the Part 1 application (Section 5) and in the National Register (NR) form (Section 7) typically describes a property's physical appearance and character-defining features. However, the physical description in a Part 1 application may be shorter than in the NR form because, for the purposes of an HPCA application, the Part 1 application may be documented with photographs; by contrast, photographs submitted with a National Register nomination *illustrate* the qualities discussed in the physical description but do not *replace* the narrative in an NR form. (A seemingly subtle distinction but grounded in the National Register regulation at 36 CFR § 60.2(a) and 60.3(i) providing that the National Register is both a planning tool and a legal document.)

Significance Statement: Part 1 Application vs. National Register Form

The statement of significance in the Part 1 application (Section 6) and in the NR form (Section 8) both document a property's significance within one or more local, state, or national contexts. Both require describing the events, activities, or characteristics that make the property significant. For example, if a building is significant for its design, the statement should explain how its character-defining architectural features convey that significance; likewise, if a property is significant in local commerce or industry, the statement should explain the property's role in those activities. As discussed above, the amount of discussion and documentation required to demonstrate significance of the property will vary depending upon the particulars of the property, such as the areas and period of significance and whether the historic context is one that is already well established.

The documentation should be selective about the facts, presenting only those that directly support the significance of the property. Narrating the entire history of the property should be avoided in favor of focusing on the events, activities, or characteristics that make the property significant.

Please note that an accepted Part 1 application for the purposes of the tax incentives program does not mean that the Part 1 application's significance statement or physical narrative will be sufficient for a National Register nomination. As discussed above, the narratives in a Part 1 application do not need to be as thorough as the documentation typically included in a National Register form. However, a National Register nomination must be adequately documented for the purpose of listing in the National Register and will likely require more detail in the corresponding sections of the National Register form.

Timing Issues Regarding HPCA Applications and National Register Nominations

Documenting a property actively undergoing a historic rehabilitation can be a challenge, particularly for National Register nominations, and the HPCA application process is separate and distinct from the National Register nomination process. Proponents should work closely with the State Historic Preservation Office (SHPO) on the content and timing of the National Register nomination submission.

For a property to be listed in the National Register, a completed National Register Nomination Form 10-900 must be submitted by the applicant to the SHPO for review. Submission and processing of the National Register form is separate from the HPCA and Part 1 application process. National Register nominations for properties participating in the tax incentives program may be submitted by the applicant to the SHPO to begin the nomination process at any time (although applicants should take into consideration IRS requirements regarding late certifications). Neither a draft nor a complete National Register nomination for the property is required to be submitted to the SHPO before a Part 1 application is reviewed by the SHPO or the NPS.

Likewise, a Part 3, Request for Certification of Completed Work, application for a completed project is not required to be either submitted or approved by the SHPO or NPS for a National Register nomination for that property to be reviewed by the SHPO or the NPS.

A Part 1 application will always document the property based on its pre-rehabilitation appearance and condition. By contrast, a National Register nomination will document the physical state of the property *at the time the nomination is prepared*, which, for a property for which Federal historic tax credits are being sought, could be before, during, or after rehabilitation. It is not uncommon for a nominator to be concerned about a National Register nomination not accurately reflecting a property's physical state given that the property's condition is in flux from an ongoing rehabilitation project. However, because important character-defining features should always be documented in a National Register nomination, and because those features are unlikely to be significantly changed by a historic rehabilitation project, the National Register physical narrative in Section 7 of the National Register form is likely to continue to be factual even when the rehabilitation work is complete. Nevertheless, depending upon the extent of changes to the property, a revised narrative may be required.

Photographic documentation may be challenging for a property actively undergoing rehabilitation. As provided by National Register guidance, photographs included in the property's National Register nomination must provide an honest visual representation of the property's significant features and historic integrity at the nomination's time of submission. If the National Register nomination is submitted while the property is actively undergoing rehabilitation, revised photographs (along with an updated narrative description) may be required, depending upon the extent of changes to the property. This is true for any property whose condition may change during the nomination process, for example, due to storm damage or other work actively being undertaken not associated with a historic tax incentive rehabilitation project.

Consulting NPS Resources on the National Register

Because Part 1 applications for preliminary determinations must contain substantially the same level of documentation as National Register nominations, National Register guidance materials and examples are helpful in understanding how to clearly and concisely document a property's significance and integrity.

The National Register's core guidance documents continue to provide relevant information for documenting the historic significance and physical integrity of property: *How to Apply the National Register Criteria for Evaluation* and *How to Complete the National Register Registration Form* are both linked above and available at the National Register's [publications webpage](#).

Additional guidance materials, also available on the National Register website, include:

- a [substantive review checklist](#) for preparing National Register nominations,
- [Best Practices Reviews](#) for targeted guidance on specific topics—including preparing concise physical description narratives and significance statements—with examples of successful listings, and
- [sample nominations](#) of successful listings for a variety of property types, under a variety of levels, areas, and periods of significance.

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