



Federal Historic Preservation Tax Incentives – Electronic Submissions FAQs

Table of Contents

[General Information](#)

[Submittal Requirements](#)

[NPS Hold Submittals](#)

[Naming Conventions](#)

[Photographs](#)

[Other Documentation](#)

[Additional Resources](#)

General Information

- Are there changes to when I can begin the application process?
 - No. Apply at any time during the year. Apply before starting rehabilitation work whenever possible. We encourage you reach out the TN SHPO with any questions as soon as possible. As always, *applicants who undertake rehabilitation projects without prior approval from the NPS do so at their own risk.*
- When are electronic submittals required?
 - All applications submitted to the TN SHPO or the NPS on or after August 15, 2023 are required to be in electronic form, using the newly revised 2023 application forms.
- Is the TN SHPO requiring electronic submittals?
 - Yes, in accordance with NPS guidelines, the TN SHPO will require exclusively electronic submittals on or after August 15, 2023.
- How does the submittal process work?
 - For Part 1, Part 2, Part 3 applications and amendments, you will submit files to the TN SHPO using our required process. Once the TN SHPO completes their review, and no additional information is required, the TN SHPO will forward the electronic application to NPS for review.
- Are there new application forms?
 - Yes. The new required forms are labelled: **NPS Form 10-168 (Rev. 6/2023)**. This is the only form that will be accepted on and after August 15, 2023.
- I started completing the previous form for my project, but it will not be submitted to the SHPO prior to August 15th. Can I still use that form?
 - No. If an application will not be submitted to the SHPO before August 15th, the new form must be used.
- I have an approved Part 1 that was submitted using the previous form. I am working on the Part 2 narrative and will submit it after August 15th. Can I still use the previous Part 2 form to be consistent with my Part 1?
 - No. If an application will not be submitted to the SHPO before August 15th, the new form must be used. It is possible that some projects might be hybrid, consisting of physical and electronic submittals as well as the previous and new forms.
- If the application form is all electronic, how do I sign the form?
 - E-signatures are required for the electronic submittals.

- What types of e-signatures will be accepted?
 - Three types of e-signatures will be accepted: 1) a scanned PDF of an actual, original ink-signed application, 2) a scanned or digitized version of an actual, original handwritten signature, and 3) a digital signature using a digital ID (e.g., using Adobe software). A name typed in a different font and other types of generated signature images will not be accepted. Refer to the image below for examples of acceptable and unacceptable e-signatures.
- How will NPS electronically sign the cover page if the submitted cover page is printed, signed, and scanned?
 - NPS can add an e-signature to a PDF whether it's a scanned hard copy or a digitally signed PDF.

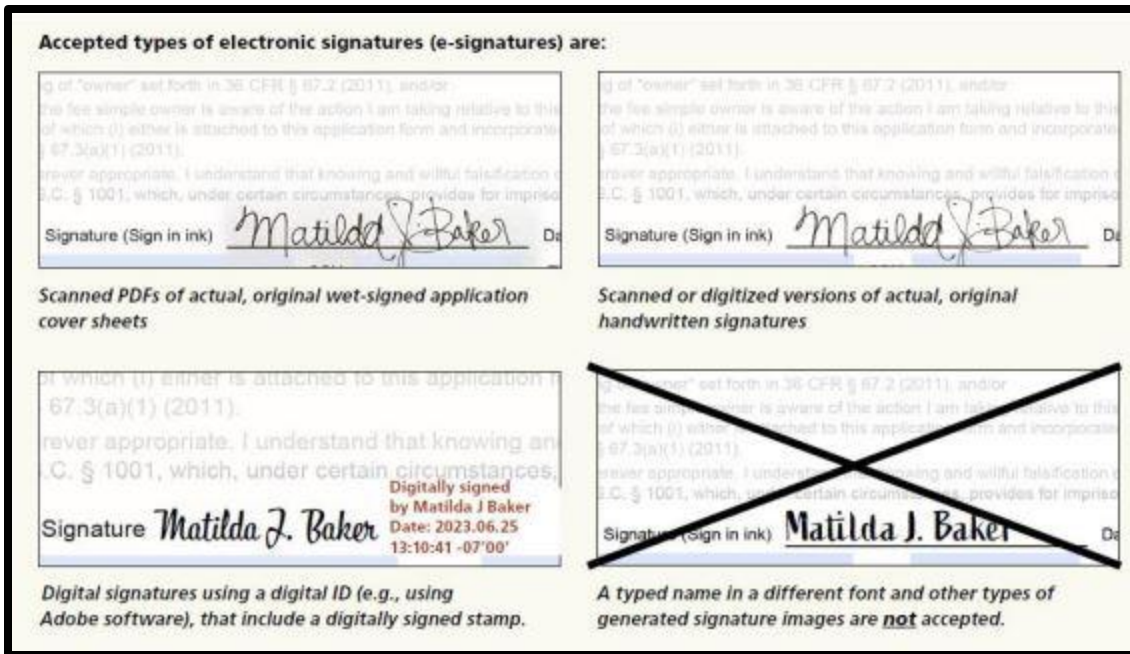


Image borrowed from National Park Service's "Applicant and Project Contact Electronic Submission Workflow"

- What happens to applications submitted in hard copy that are still under review by the SHPO or the NPS at the time of the August 15th deadline?
 - Applicants will NOT be required to resubmit previously submitted applications electronically after the August 15th deadline if the application was submitted to the SHPO or the NPS prior to the deadline and review of the application is still in process. For example, if an application was submitted prior to the deadline and later put on hold for more information, and the applicant submits the additional information after the deadline, the additional information must be submitted in electronic format. The original

application and submittals would remain hard copy but any subsequently submitted information after the deadline must be in electronic format.

- Can I submit physical copies to the TN SHPO and then they send them to NPS electronically?
 - No. On August 15, 2023, the TN SHPO will only accept electronic submittals.
- How will applications be submitted electronically to the NPS?
 - The TN SHPO will forward reviewed completed applications to the NPS via a SharePoint portal developed by NPS.
- How long does it take for the NPS “[Check Project Status](#)” database to update once materials are uploaded to the NPS SharePoint site?
 - The database typically takes about one (1) day to refresh.
- What effect will electronic submittals have on the TN SHPO and NPS response time on submissions?
 - The 30-day review period for the TN SHPO and the 30-day review period for the NPS will remain in place, provided complete applications and documentation have been provided. Like with physical applications, requests for additional information might delay review periods.
- Is Adobe required to view the application?
 - Yes. The application forms are fully functional only in Adobe Acrobat and Adobe Reader (a free PDF reader that can be downloaded from Adobe). The forms cannot be opened, completed, or saved in a browser window, which is why clicking on the link for a form produces the Adobe 8 message.
- How do I open the application? I get the following message when I attempt to open it in the browser: “The document you are trying to load requires Adobe Reader 8 or higher. You may not have the Adobe Reader installed or your viewing environment may not be properly configured to use Adobe Reader.”
 - Follow these directions, also listed on the website, to download, save, and then use the application forms:
 - DO NOT open the forms in a browser tab or window
 - DOWNLOAD the forms and SAVE them to your computer. To download and save, right click on the link and choose "Save Link As..."
 - Open Adobe Acrobat or Adobe Reader
 - Open the forms in Acrobat or Reader

- How do we sign up for the Technical Preservation Services newsletter?
 - You can sign up by following the instructions on the “[Keep in Touch with TPS](#)” page.
- How can we continue to receive support through this process?
 - Reach out to THC.Rehab@tn.gov with any questions you might have. The NPS will also be hosting weekly virtual calls for applicants/project contacts/program users. These dates will be posted on the NPS Technical Preservation Services website as well as sent through emails.
- Will NPS decision letters still have original handwritten signatures from the NPS reviewers?
 - No. All NPS decisions will be issued electronically using the Department of the Interior’s authorized digital signature method. However, applicants may request that original, handwritten signatures appear on the NPS decisions.
- Now that project submittals are electronic, can reviews of Part 2 and Part 3 applications, does this mean that reviews can begin before the review fee has been paid?
 - No. The review fee must be paid before any review can commence. Failure to pay the review fee might result in the closure of the application.

Submittal Requirements

- Can I submit a Part 1 application (or Part 2 application) if all of the rehabilitation work is complete and the building is placed in service?
 - It is not advisable. It is always advised to begin the application process before any rehabilitation work has taken place. There may be implications to eligibility as a result. Refer to the IRS Code and Regulations in Section 7. Additional Information for more on this late certifications.
- How does the applicant/project contact submit my electronic application materials to the TN SHPO?
 - You can use the [TN SHPO electronic submittal portal](#).
- How should the applicant/project contact submit the electronic application using the TN SHPO portal?

- You must read the TN SHPO's [INSERT SUBMISSION REQUIREMENT GUIDELINES] and NPS's [Applicant and Project Contact Electronic Submission Workflow](#).
- What are the differences between the electronic submittals and the physical copies previously submitted?
 - For the most part, only the method of submission is changing, not the content. You will still submit the appropriate (Part 1/2/3/Amendment) application with the required supporting documentation. A new requirement with electronic submissions is the transmittal log.
- What is the transmittal log and what information should be included?
 - The transmittal log details what is being submitted electronically with each submission. The information that is included depends on the scope of the project and each application phase. Samples are available on the NPS's [Transmittal Log Examples](#).
- Why is the transmittal log necessary?
 - The transmittal log helps ensure that everything that you intended to submit to the TN SHPO and NPS was successfully transmitted.
- Can Part 1 and Part 2 applications be submitted at the same time?
 - Yes. Through the TN SHPO electronic submittal portal, you will complete one submittal for all Part 1 materials and a separate submittal for all Part 2 materials.
- Can all of the materials for each application be submitted as a single PDF?
 - No. The NPS requires that each type of documentation is submitted as an individual PDF. Refer to the NPS's [Electronic File Format Standards and File Naming Conventions](#) as well as the TN SHPO's Photograph Documentation Guidance for the Rehabilitation of Historic Properties [LINK FILE ONCE ONLINE]. **Please Note: The TN SHPO will accept photographs only in a PDF format. Individual photographs will not be accepted. This differs from NPS proposed submittal formats.**
- Can I begin the rehabilitation work on my building before the NPS reviewer has provided a decision on my Part 2 application?
 - Applicants are strongly encouraged to submit applications describing proposed work and to receive approval from the NPS prior to the start of work. *Applicants who undertake rehabilitation projects without prior approval from the NPS do so at their own risk.*

NPS Hold Submittals

- What if NPS places a hold on the project to request more information?
 - When NPS puts an application on hold and requests, and requests additional information, the applicant and project contact will be notified by email to submit that information through the portal, *with a copy sent to the TN SHPO [by the applicant] concurrently using the TN SHPO's electronic submittal process*. Instructions for submitting formation will be included in the NPS email. The applicant and project contact will be emailed a link to a project-specific electronic folder in the SharePoint portal for one-time use. The applicant/project contact will be the only individuals outside of NPS with access to this folder. Once the information has been uploaded by the applicant/project contact and the intake completed by the NPS, the files will be moved out of the folder and the folder will be deleted. For more detailed information see the NPS's [Responding to NPS Holds & Uploading Files to the HPCA Submission Site](#).
- If a consultant is completing a submittal with an applicant and more information is requested, will both have access to the SharePoint?
 - Yes. Both the project contact (consultant) and applicant will receive an email with a link to access a SharePoint folder.
- How does the applicant/project contact get access to the SharePoint?
 - The applicant/project contact only receives limited access to a SharePoint folder if an NPS hold is placed on the project. Otherwise, the applicant/project contact will not have access to the SharePoint. The TN SHPO only has access to the NPS SharePoint to upload applications and amendments. The TN SHPO does not have access to SharePoint folders for project holds.
- In the event of a hold being placed on a project, does the NPS provide the additional information uploaded to the SharePoint with the TN SHPO?
 - No. The applicant/project contact must upload the additional information through the [TN SHPO's electronic submittal portal](#) as well.
- Does the applicant/project contact retain access to the SharePoint folder created for project holds?
 - No. Once the NPS administrative staff are notified of an upload, they will access the folder within 24 hours. At that point, the applicant/project consultant will no longer have access to the SharePoint folder.
- Should I upload more information than what was requested?

- Only upload the information specific to the request. New information not requested in the hold email should be submitted to the TN SHPO submittal portal as an amendment. If new information is submitted in addition to that requested as part of the hold email, this may delay the review of your application and the additional information, and you may be directed then to submit all the information to the SHPO through the normal amendment process.
- How do I find out more about uploading additional information for project holds to the SharePoint?
 - The applicant and project contact will receive a hold notification email only alerting them to the hold. A separate email will be sent with a link to the SharePoint as well additional information on the process and requirements.
- What if the additional information requested through a hold requires additional creation time (i.e., drawings)?
 - The NPS hold process will work in the same manner as before. Applicants/project contacts must respond within 30 days of the date of the notice. Applicants/project contacts are responsible for requesting an extension of the hold period if needed. Instructions for requesting an extension are included in the hold email. If the information is not received within 30 days, and an extension has not been requested, the file will be closed, and work undertaken on the structure will not qualify as a “certified rehabilitation.”
- How do I name documents I am submitting to the NPS SharePoint as part of a project hold?
 - The naming for these documents will be the same as all others and follow NPS’s Naming Conventions.
- Are there any differences in submitting materials for NPS holds?
 - No. All submittals need to be individual PDFs. All plans and drawings must be flattened.
- Is there a file size limit for the information that needs to be uploaded to the NPS SharePoint?
 - No. There are no limits on the overall size of files that can be uploaded. Because of this, zip files are not necessary and should not be submitted.
- Do I need to submit a transmittal log for NPS holds?
 - Yes. A transmittal log is required for all submittals. It helps to ensure that all materials have been correctly submitted. NPS administrative staff will contact the applicant/project contact within one business day if anything is missing.

- Who do I contact if I am having trouble with the SharePoint?
 - You can contact Technical Preservation Services at nps_tps@nps.gov.
- Where can I find more information about NPS holds and submitting the required materials?
 - Please refer to the NPS's [Responding to NPS Holds & Uploading Files to the HPCA Submission Site](#).
- Is it acceptable to send the narrative descriptive work of Part 2 applications as a separate file from the application cover sheet, if the narrative goes beyond the available space on the application?
 - Yes. The additional narrative would be submitted as a separate PDF. The files must be labeled correctly, according to the NPS naming conventions. [See NPS's [Electronic File Format Standards and File Naming Conventions](#) and Section 4: Naming Conventions below.]

Naming Conventions

- What is the correct format for naming electronic submittal files?
 - The correct naming conventions can be found on the NPS's [Electronic File Format Standards and File Naming Conventions](#).
- Will the TN SHPO have different naming conventions for electronic submittals?
 - No. The TN SHPO will follow the same name conventions as the NPS.
- Is there a limit to the length of the file name?
 - Yes. File names should be limited to 75 characters.
- Can I use a dash in the naming convention if there are multiple numbers listed in the address? For example, 214-216E9thStreet?
 - No. In accordance with the NPS naming conventions, underscores should be used in place of dashes.
- Because the naming conventions don't allow spaces, what is the best method for city names comprised of two words?
 - As an example: Johnson City would appear as JohnsonCity.
- How should we name supplemental information (e.g., correspondence between the SHPO and applicant)?

- It should be saved as a separate PDF and named according to the NPS Naming Conventions.

Photographs

- How many photos can I put on each page of the PDF?
 - No more than two (2) photos per page of the PDF will be accepted.
- What size is the preferred size of photographs on the PDF?
 - Photos should be a minimum of 4"x6" per photo.
- If all of the submittals are now electronic, can the photographs and photo key be combined into one PDF?
 - No. The photographs and the photo key must be separate, individual PDFs.
- Can the photo key be more than one page?
 - Yes. The photo key can be multiple pages if there are multiple levels of a building that need to be accounted for.
- How should the photographs PDF be labeled within the document?
 - The photographs PDF should contain the following information in the header of each page: property name, address, date of photos, and application part (i.e., Part 1, Part 2, Part 3, Amendment).
- Should photographs still be numbered and have captions?
 - Yes. Each photograph should have a number (labeled according to a photo key) and a descriptive caption that is listed under each photo. The caption must include: the view shown (e.g., north side) and a description of the view (e.g., plaster damage in the dining room, north wall). The photo key will be a separate file.
- What program is recommended for organizing photographs into PDFs?
 - Neither NPS nor the TN SPHO have any specific program recommendations. However, please refer to the TN SHPO's Photograph Documentation Guidance for the Rehabilitation of Historic Properties for some tips on formatting photographs in a PDF. [ADD LINK TO DOCUMENT WHEN ON WEBSITE]
- Can there be one photograph per page?

- Yes. There cannot be more than two photographs per page. Please refer to the NPS’s [Photo Naming Conventions, JPEG Requirements, and Photo Sheet Examples](#) and the TN SHPO’s Photograph Documentation Guidance for the Rehabilitation of Historic Properties for further information. [ADD LINK TO DOCUMENT WHEN ON WEBSITE]
- On the photo sheets, does the project information need to appear in the header or the footer?
 - It should appear in the header. Please refer to the TN SHPO’s Photograph Documentation Guidance for the Rehabilitation of Historic Properties for examples. [ADD LINK TO DOCUMENT WHEN ON WEBSITE]
- What if the photographs were taken on different dates? How do we format the photo sheets with that information?
 - The overall application date can appear in the header, while any individual dates of the photos that differ can appear in their accompanying captions.
- Are maps considered photos for submittal purposes?
 - No. Maps are a separate form of documentation and should be submitted as a separate PDF file.

Other Documentation

- Can plans of existing and proposed conditions be submitted as a single PDF?
 - No. The plans must be separated into individual files and be properly named according to NPS’s naming conventions.
- If the existing conditions, demolition, and proposed drawings are all initially one file, how can they be separated?
 - Adobe allows you to extract pages from a file and save them as a separate file.
- Should the PDF plans still be 11”x17”, or can they be larger?
 - The TNSHPO requires that floor plans be at least 11”x17;” plans can be larger if preferred. All plans must be flattened.
- What does it mean for a file to be “flattened?”
 - Some complex PDFs (for example, architectural drawings) can contain multiple layers, and for the purposes of electronic

submittals, those layers must be flattened into a single layer. This makes it easier for the TN SHPO and NPS reviewers to zoom in and compare the different plans. To flatten an electronic file of architectural plans, select the “Print” function, then select “Adobe PDF” as the printer, and save the file. More information about how to flatten PDFs can be found in Adobe’s [“Merge or flatten layers in the PDF.”](#)

Additional Resources

- Program Regulations
 - [Department of the Interior/NPS regulations, 36 CFR Part 67](#)
 - [Internal Revenue Code Section 47, Rehabilitation tax credit](#)
 - [IRS Regulations – 26 CFR 1.48-12, Qualified rehabilitated buildings](#)
 - [IRS Regulations – 36 CFR 1.47.7, Rehabilitation tax credit allocated over a 5-year period](#)
 - [IRS Program Aspects](#)
- Rehabilitation Topics
 - [Secretary of the Interior’s Standards for Rehabilitation of Historic Buildings](#)
 - [Planning Successful Rehabilitation Projects](#)
 - [Illustrated Guidelines for Rehabilitating Historic Buildings](#)
 - [Guidelines on Sustainability for Rehabilitating Historic Buildings](#)
 - [Guidelines on Flood Adaptation for Rehabilitating Historic Buildings](#)
 - [Interpreting the Standards](#)
 - [Preservation by Topic Index](#)
- [Project Status Portal](#)