



# ACRA PRINCIPLES FOR UPDATES TO THE SECRETARY OF THE INTERIOR PROFESSIONAL QUALIFICATIONS STANDARDS

September 2023

## INTRODUCTION

The [Secretary of the Interior Professional Qualification Standards](#) describe in terms of academic attainment, training, and experience minimum professional qualifications for a number of historic preservation disciplines.

The Standards, which address the fields of History, Archaeology, Architectural History, Architecture, and Historic Architecture, were last updated in 1983. In recent years, the Interior Department has discussed making changes.

The Standards are of critical importance to the cultural resource management (CRM) industry, as they delineate the minimum qualifications required for many of the undertakings upon which such firms work, and may impact hiring decisions these firms make. Although there is a diversity of opinion within the industry about the Standards, there is little doubt that the American Cultural Resources Association (ACRA), as the voice of the CRM industry in the United States, needs to have a voice on changes to the Standards.

In spring 2023, the ACRA Board of Directors authorized the formation of a Task Force to explore how ACRA can best represent its member firms in any future debate about, or proposed changes to, the Professional Qualifications Standards.

The Board asked the Task Force to discuss the following questions:

1. What, if anything, are ACRA's broad principles related to the Standards?
2. Are there any "red lines"; i.e., proposals that would be so deleterious towards the industry that taking a position would be imperative and for which consensus among ACRA members would be possible?
3. Recognizing that the Standards relate to the challenges of workforce and diversity, are there other proposals ACRA should advance, either through federal policy, or otherwise, without taking an explicit position on the Standards themselves?
4. What does ACRA believe should be a part of the process by which Interior would propose changes (e.g., consultation, meetings, timeframe, etc.)
5. Should ACRA take a position on whether other CRM-related professions should be added to the Standards?
6. How can ACRA best engage its members across all professions, firm types, regions and other categories, to ensure that all members have a voice in the conversation?

ACRA invited members to apply to the Task Force in late spring, and the Task Force was selected in May 2023. The Task Force met virtually on a monthly basis during the summer of 2023, and developed the following principles.

## ACRA PRINCIPLES

### 1. **The status quo is not an option.**

The current version of the Secretary of the Interior Professional Qualifications Standards (“Standards”) is 40 years old. Enormous changes have occurred in the cultural resource management (CRM) industry since then, and it is time for the Standards to be updated. Taking no action is not a viable option.

### 2. **Professional standards are necessary to maintain excellence in preservation.**

The Department of the Interior needs to continue to require professional standards for all CRM practitioners. ACRA opposes eliminating Standards entirely. In addition, the Standards should ensure that practitioners do not take on work (or are asked to take on tasks) they are not qualified to do, such as tasks related to another cultural resources field.

### 3. **The Standards need to provide clarity and consistency.**

The Standards need to provide consistency between agencies and clarity of implementation for agencies, practitioners and stakeholders.

### 4. **Practical experience needs to be a part of the Standards.**

Practical experience, including with relevant cultural resources laws and regulations, matters as much as academic qualifications. The Standards need to include practical experience as a requirement for each discipline and clearly define the types and amount of experience required.

### 5. **The Standards need to recognize alternate pathways to qualification.**

The Standards need to allow for multiple pathways towards becoming qualified and should recognize the value of alternative routes towards qualifications. The Secretary should consider innovative solutions, which would allow emerging professionals to meet the Standards, or introduce “steps” within the framework that would provide a clear pathway with corresponding milestones and responsibilities.

### 6. **The Standards need to promote diversity and inclusion.**

The Standards need to recognize and reflect the diversity of practice areas and expertise in the CRM industry and ensure that traditionally underrepresented groups have avenues towards being qualified. This is particularly important for members of descendant communities.

### 7. **The Standards need to recognize contemporary concepts of heritage.**

The Standards, to the greatest extent possible, need to ensure that practitioners understand and are sensitive to contemporary concepts of heritage, including those of cultures whose values may be different from their own, and for whom heritage may be described in more than physical terms.

### 8. **The full spectrum of CRM fields needs to be recognized in the Standards.**

As the CRM industry has evolved over the last 40 years, the Standards need to recognize other fields that are involved, such as ethnographers, historic preservationists, historical archaeologists, bioarchaeologists, cultural landscape architects, and cultural anthropologists, for which currently there are no standards.

### 9. **The Interior Department needs to ensure broad consultation on any changes to the Standards.**

The Secretary needs to ensure that any proposed changes to the Standards are accompanied by a robust public consultation process that includes all stakeholders, including but not limited to the CRM industry; preservation practitioners; federal, state and local government agencies; national preservation professional, trade and advocacy organizations; Tribes; descendant communities; and the general public.

## **ACRA TASK FORCE MEMBERS**

Carrie Albee, Gray & Pape, Inc.

Nesta Anderson, Legacy Cultural Resources

Douglas Appler, University of Kentucky Department of Historic Preservation

Kimball Banks, Metcalf Archaeological Consultants, Inc.

Matthew Carter, AmaTerra Environmental

Wade Catts, South River Heritage Consulting

Chance Copperstone, Chronicle Heritage

Shelly Davis-King, Davis-King & Associates

Diana Dyste, HELIX Environmental Planning, Inc.

Shawn Fackler, Environmental Resources Management, Inc. (ERM)

Bonnie Gibson, Statistical Research, Inc.

Analise Hollingshead, SWCA Environmental Consultants

Jodi Jacobson, Texas State University

Maranda Kles, Archaeological Consultants, Inc.

Kurt McLean, Chronicle Heritage

Caitlin Mee, SWCA

Joanna Odom, New South Associates

Shawn Patch, New South Associates, Inc.

Carrie Pritchard-Harvey, Far Western Anthropological Research Group, Inc.

Samantha Schell, Pacific Legacy, Inc.

Patricia Slovinac, A.D. Marble

Ellen Turco, Richard Grubb & Associates

Heather Weymouth, Terracon