

First Name	Last Name	Submission Date	Feedback
Breanne	Taylor	07/23/26	In response to Rule text (23)A-D
			The Oregon SHPO should take seriously the input from archaeological practitioners who question the efficacy of the current process to become a qualified archaeologist by the state. It is imperative that SHPO develop a consistent and transparent rubric for vetting Oregon archaeologists. There are clear inconsistencies in the current review procedures wherein some archaeologists who complete alternative or one-year graduate programs are permitted, while others are denied.
			The current rules are guided by value judgements that favor "conventional" master's programs and exclude applicants who have completed HRM and CRM programs at accredited universities, regardless of the level or intensity of previous archaeological experience and academic research. In doing so, the SHPO makes clear that practitioners who need to remain fully employed during their education, are caring for families, or require accommodations for disability, illness, or other extenuating circumstances that online-based learning or alternative programs may provide, can expect to be excluded from qualifications that open doors to employment opportunities, career growth, and higher salaries.
			Members of the archaeological community, including SHPOs, consistently express concerns about the lack of diversity in our practice; however, the current qualification guidelines prevent systemically disenfranchised groups from having a seat at the table and promote an archaeology conducted by white, middle to upper-class people in the State of Oregon. By the current rules, the SHPO may grant qualification status to an individual with an advanced degree in "classics" and minimal archaeological experience, regional, or traditional knowledge. This policy perpetuates a colonial framework that pushes the discipline back. There is much potential for engagement, stewardship, and advancement in making Oregon archaeology multivocal. Updating the qualification requirements to meet the present will serve the Tribes, stakeholders, the public, and ultimately, the state.