

December 29, 2020

Re: OMB Control Number "1018-Friends"

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Clearance Officer,

JAN 04 2021

I am writing regarding the OIG Audit and resultant comments on updated reporting recommendations between "Friends" groups and the U.S. Fish and Wildlife Service as posted in the Federal Register. I am the immediate past President of the Friends of the Tualatin River National Wildlife Refuge in Oregon, a retired Federal wildlife biologist, and past staff or officer of several not for profit conservation organizations.

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The OIG Audit fails to recognize the most fundamental reason and the major flaw in their recommendations and that is the extreme diversity among the Friends organizations. One set of reporting recommendations does not match up to the fact that many Friends groups are made up of a small number of dedicated volunteers with small budgets while other Friends groups are supported by hundreds of members, permanent staff and relatively sophisticated operations. To require the same level of reporting is a bureaucratic failing driven by a focus on process and not a desire for partnership or the recognition of the faithful dedication of thousands of volunteers. One size does not fit all.

Our organization shares a great relationship and partnership with the refuge manager and staff. The FWS staff regularly attends our meetings and is intimately familiar with the Friends staff members and officers and works cooperatively on all activities. This relationship offers the opportunity to regularly provide the refuge manager with financial reports, staffing reports and other Friends activities. This model is what the OIG audit ought to strive to induce rather than a one-sided demand for records, reports and the like. Functional Friends groups are the epitome of partnerships and cooperation and allow the FWS to fully utilize the volunteers desire and energy in activities that benefit the refuge and bring Friends volunteers the enjoyment that stirred them in the first place.

A major benefit that Friends groups bring to the FWS is the ability to raise funds for activities on the refuge. Often these grant activities can funnel private money to the refuge for needed work that would otherwise be impossible for the refuge to fund. Generally, these grants are based on legal agreements that identify how and where the funding can be directed and provide all the financial records necessary to ensure appropriate expenditure. Friends groups are legally required to submit annual reports to the IRS that clearly show sources of income and expenditures. Additional reports required under the OIG Audit is an unnecessary burden and disincentive to Friends groups. In regard to donor donations, reports to the FWS are often unneeded as these are generally specific to the Friends organization and bound by legal donor/Friends agreements and reported to the IRS. In summary, the OIG Audit fails to recognize the requirement that Friends groups have with regards to the IRS and related financial matters as well as an independence from FWS control in regards to donations made for their benefit.

It appears the the OIG Audit and subsequent recommendations lack good insight in regards to what makes a partnership flourish. Demands from the Washington level fail to recognize the reality of working partnerships at the ground level. Each Friends group can be encouraged to strengthen the working relationship with the FWS but the failure of the FWS to understand and obtain fundamental knowledge of the Friends group they work with is clear in the report as well. Partnerships require responsibility from both parties and it is clear that the FWS at the local level can obtain much of the information the audit recommends by better communication with their Friends group. Encouraging a strong partnership and ongoing communication between Friends groups and their FWS partners will go a long way to answering many of the questions brought up by the audit. Any effort should have this goal as its starting point.



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