

[EXTERNAL] OMB Control Number "1018-Friends"

Friends of Haystack Rock <fohrap@gmail.com>

Fri 1/8/2021 3:50 PM

To: Info\_Coll, FWHQ <info\_coll@fws.gov>

Cc: Harris, Dawn <Dawn\_Harris@fws.gov>

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Thank you for the opportunity to provide comments regarding Data Collection associated with Friends of Refuge organizations.

The collection efforts by USFWS needs to be targeted to the type of refuge activities each Friends group engages in. One set of data collection standards will not apply to all refuge Friends groups. As noted below, many of the collection requirements being considered are not applicable to the Friends of Haystack Rock.

Friends of Haystack Rock is an independent non-profit organization registered with the State of Oregon. We have received a 501(c)(3) designation from the IRS. We follow all the rules of a non-profit including fiscal responsibility. We raise no funds on the Refuge, no activities occur on the Refuge, and we are not a membership fee-based organization. Our mission and scope of work extends to other partnerships beyond the FWS, including the City of Cannon Beach. The Friends of Haystack Rock board of directors is responsible for determining how all funds will be used. While we have signed a Friends partnership agreement with USFWS, in which we qualified numerous statements as non-applicable, the agreement is a partnership agreement, not an ownership agreement with FWS. Without such an agreement, our organization would continue to exist with its current mission. As such, The FWS can recommend and present suggestions but has no fiscal authority to determine how our Friends organization spends donor funds, and no fiscal authority to oversee our financial activities.

**Based on the information above, our response to the proposed data collection by USFWS is as follows:**

- Basic program information documentation, to include documents such as Internal Revenue Service (IRS) determination letters recognizing an organization as tax exempt, submission of IRS Form 990-series forms, bylaws, articles of incorporation, etc.; **APPLIES to Friends of Haystack Rock**
- Internal financial control documentation for the organization; **DOES NOT APPLY to Friends of Haystack Rock**
- Recordkeeping requirements documenting accountability for donations and expenditures; **DOES NOT APPLY to Friends of Haystack Rock**
- Assurance documentation that donations, revenues, and expenditures benefit the applicable refuge or hatchery; **DOES NOT APPLY to Friends of Haystack Rock**
- Resumes of potential Friends group staff selected to work in visitor centers; NO visitor center exists, **DOES NOT APPLY to Friends of Haystack Rock**

- Annual performance reporting (donations, revenues, and expenditures) and number of memberships (if applicable); and **DOES NOT APPLY to Friends of Haystack Rock**
- Additional information that may be included as part of quarterly, annual, and in-depth program reviews. **DOES NOT APPLY to Friends of Haystack Rock.** In the future, if there are joint programs in partnership with USFWS, reporting requirements of those programs should be documented and agreed to prior to the onset of the program.

Thank you,  
Angela Benton  
Friends of Haystack Rock  
Board Chair