

[EXTERNAL] OMB Control Number "1018-Friends"

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To: Info_Coll, FWHQ <info_coll@fws.gov>

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To Whom It May Concern -

Please see my answers below in blue.

1) Whether or not the collection of information is necessary for the proper performance of the functions of the agency, including whether or not the information will have practical utility;

Friends Organizations are a reflection of the Service. The Friends has to have all their Ducks in a Row. The Friends have a fiduciary responsibility to their donors, to the Service, and to the Board. Yes - the Service does have a responsibility to ensure that everything is being done correctly. But yet - it really is up to the Friends to make sure they are following the nonprofit rules of accountability. The Service should not have to govern their Friends organizations.

(2) The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used;

Please see my response to Number 4.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected; and

What the Agency is requesting is Public Information. Anything that is requested outside of the nonprofits guidelines or what Guidestar wants is public knowledge. Make the language on an 8th Grade level in the request for everyone to easily understand what you are requiring in order to make this partnership work successfully.

(4) How might the agency minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of response.

The Agency/Service should require that all Friends Organizations fill out a complete Guidestar profile. Once this is done - then all it takes is annual reporting to update

their profile. What is on Guidestar is the extent of public documentation that ANY entity can ask for. Not all Friends Organizations will be filling out the long form of a 990. Most will be filling out the 990N - which gives the Friends the only box to select is "Has the Organization made less than \$50K in the reporting year?" That's what many of these Friends do not understand - what the Agency is requesting is already and should already be part of their public reporting.

Here is the Friends of the High Plains Refuge Complex. Ours is a work in progress.

<https://www.guidestar.org/profile/46-3222600>

Friends of the High Plains Refuge Complex - GuideStar Profile

GuideStar connects donors and grantmakers to non-profit organizations.

www.guidestar.org

The one everyone should strive to be like is Friends of Ottawa National Wildlife Refuge:

<https://www.guidestar.org/profile/34-1904821>

Friends of Ottawa National Wildlife Refuge - GuideStar Profile

1. We will build a dynamic organization that is a durable and sustainable Friends group. The Friends of Ottawa National Wildlife Refuge will be a strong organization with sufficient human and financial capacity to achieve our mission, vision, goals and objectives.

www.guidestar.org

Additional comments:

I have no problem with what the Audit was requesting. The problem I have is the language of the audit. The lack of oversight by the Service over the Friends falls back on the Service and the Audit pointed that out clearly.

The bigger issue that this Audit has brought to the surface, along with Covid-19 is that communication is the key for any partnership to grow, work, and survive. For the public to care and for the Friends to care - then the Service needs to communicate and most importantly it needs to care about the properties and lands it is entrusted to protect. Having Refuges shutdown, having no employees onsite to interact with the public says a lot about lack of caring (this references pre-Covid). Why should any of us care when the Service does not care? I know most refuges do not have this problem. Bosque is the perfect example of having onsite people. Buffalo Lake has a beautiful little headquarters and it is always closed. Instead of stretching Service employees into doing other jobs they were not hired to do - utilize contract workers (like with me I would love to be able to do biology work for the Service or take photographs to showcase the refuges) or hire more employees

or the novel idea - allow the Friends to actually be on sight for visitors to interact with. I hate the phrase "trust me" - but trust me that presence is important to the public you serve. The presence protects the natural resources so much better than absence.

One last item I am trying to research is the limits of funds in a nonprofits bank account. Nonprofits are not formed to make money or sit on large sums of money. There is a rule and I have not found it yet. Nonprofits should not be spending thousands of dollars on volunteer banquets. That is poor fiduciary responsibility of nonprofit funds.

One last note: Assets are tangible items that can be sold to make a profit and what the nonprofit has actually invested in. A computer is an asset. A van is an asset. A banking account an asset. Assets do not include consumables.

Thank you for your time.

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"The trouble with the world is that the stupid are cocksure & the intelligent are full of doubt." ~ Bertrand Russell