

[EXTERNAL] OMB Control Number "1018-Friends"

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

 1 attachments (14 KB)

OMB comments.docx;

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I have put my comment both in the email and an attached file.

Comments concerning: Federal Register notice OMB Control Number "1018-Friends"
The US Fish and Wildlife Service (FWS) desire to collect documentation from Friends organizations.

First off Friends organizations are remarkably diverse in their size and makeup and many have no paid staff, and everything is strictly volunteer. The OMB report seems to not recognize this fact. More paperwork and reporting above and beyond the Partnership agreement means more volunteer paperwork hours which we already do enough of as our requirement under the Partnership agreement. This is a good way to lose board members and volunteers who do want to be inundated with ore paperwork. Example of these additional and unnecessary requirements are many and here are some examples.

First. The Service has no business in the internal finances or business of the Friends organization beyond what is already the Partnership Agreement. Friends already must follow State and Federal laws of nonprofits which override anything the Service can ask for. The Service only need a 990 to ensure that the Friends organization is operating in a legal fashion.

Second. Supplemental Documentation Requirements: Quarterly and annual Review. One again this is in the Partnership agreement. An annual review is already part of the agreement and this is just asking the same things.

Simply put the Service does not need any information beyond what is already in the Friendship Agreement.

Lastly OMB looking at the internal workings of a nonprofit is beyond their authority and it looks like that is what they did. OMB can only audit a government agency and here it seems they overstepped.

Dan Price

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