

[EXTERNAL] OMB Control Number "1018-Friends"

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

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Documentation not necessary for the proper performance of the functions of FWS:

- Internal financial documentation:
  - Nonprofits need to implement financial controls to protect their assets and reputation. This is the responsibility of the board and can not be transferred to anyone else.
  - According to the Friends Policy and FPA, FWS can not direct Friends to implement these management practices nor assess the Friends internal financial controls.
    - The Friends policy states that "Friends are required to independently manage the legal, financial, personnel and administrative activities and responsibilities of the organization." (633 FW 1.16 b)
    - The Friends Partnership Agreement states each party will, "Take steps to avoid the appearance that either party ... directs the management or decision making process of the other. The Service and the Friends will maintain an evident and distinct separation between their organizational management activities." (V.A. (7))
  - A nonprofit's staff, board, and occasionally partners may be involved with the formulation of these controls. It is ultimately the fiduciary responsibility of the board to develop, approve and ensure adherence.
- Resumes of potential Friends group staff selected to work in visitor centers.
  - Mandating that the Friends must share the resumes of potential staff gives the appearance that FWS is interfering in the decision-making process of the Friends and therefore violates the policy and FPA.
  - Friends have agreed to comply with Homeland Security Presidential Directives and realize that Friends representatives may need to obtain federal security clearances. (FPA III.E.)
- Supplemental Documentation Requirements: Quarterly Review.
- Supplemental Documentation Requirements: Annual Review:
- FPA already stipulates that the partners will meet annually to assess the effectiveness of the partnership as it relates to the FPA.

Thank you,

David Bell, V.P. Friends of Balcones Canyonlands NWR