

[EXTERNAL] OMB Control number 1018- friends

Jan James <00janjames@gmail.com>

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

 1 attachments (451 KB)

Info Collection by FWS- Version 0.1.docx;

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Dear Representatives of FWS,

Please find attached my response to the Federal Register notice.

Janet James, President
Friends of the Mid-Columbia River Wildlife Refuges,
Burbank, Washington State
USA



Reference Document #2020-24802

Dear Fish and Wildlife Service,

Thank you for providing Coalition of Refuge Friends and Advocates (CORFA) and National Wildlife Refuge Association (NWRA) this opportunity to comment on the Federal Register notice about the US Fish and Wildlife Service (FWS) desire to collect documentation from Friends Organizations. Friends are the leading advocates for wildlife refuges and give their time and money to promote refuge work and work to conserve the natural resources associated with the sites.

With reference to the four main topics for comment;

1. Documentation to be collected once should include the Friends Partnership Agreement (FPA) with attachments.

Articles of Incorporation,
IRS Determination letter,
Supplemental FPA with description of Service Property,
Basic Friends organizational documentation;
Form 1023 or 1023EZ,
Documents submitted with Form 1023,
Documents the IRS required the organization to submit in support of their application,
Bylaws.

Documentation to collect annually;

Modifications to the FPA,
Modifications to the Supplemental Agreement,
Information return (990 series tax return)
Annual report of aid provided to FWS and a short narrative as it relates to the FPA.

Business operations;

Sales,

Expenditures,

Significant events related to the operations of the Friends Programs,

Direct financial aid to the FWS site with narrative,

Membership, numbers and events.

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

1. Internal financial documentation. This is the responsibility of the Board and cannot be transferred to anyone else. The Friends policy states that “Friends are required to independently manage the legal, financial, personnel and administrative activities and responsibilities of the organization” (633FW 1.16b)
2. Resumes of potential Friends group staff selected to work in visitor centers. This has the implication that the 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)
3. Supplemental Documentation; Quarterly Review, Annual Review.
FPA already stipulates that the partners will meet annually to assess the effectiveness of the partnership as it relates to the FPA

2. Our Estimate of the burden for this collection of information

We are following the FWS’ guidelines for this task which estimates that a Friends group would spend 184 hours/year or 15 hours/month. This burden will fall primarily on the Treasurer and President.

3. Ways to enhance the quality, utility, and clarity of the information to be collected

1. Identify and share how each document FWS requires from Friends will be used prior to its collection.
2. Modify our Friends Policy, FPA, and the Supplemental Agreement so that they address the needs of Friends as independent nonprofit organizations.
3. Collect documentation that relates only to the FPA and Supplemental Agreements.
4. Demonstrate that net revenues generated on the Refuge property are used to benefit the site and Friends activities and programs that benefit the site. (212FW 8.18 B)

5. Develop procedures to ensure that requests from FWS for any expenditure by the Friends of revenues generated on the Refuge meet FWS ethics guidance and that Friends are provided assurance documentation. It is the responsibility of FWS to ensure that their requests meet their ethics rules.
6. This Friends group currently produces a monthly financial statement for the Board which is shared with the FWS' Friends liaison.
7. We would request the collection from quarterly to annually.
8. FWS needs to recognize that Friends organizations have different revenue levels. The annual revenue level of this Friends group is less than \$50,000/year and we rely on Form 990 to assess our financial health.
9. This Friends group has an Annual Meeting with membership and representatives from F&W to discuss the performance and achievements of the year.

4. Ways to minimize the burden of the collection of information

1. Create a checklist to assure the collection of FPA, Supplemental FPA and Basic Friends organizational documentation.
2. Digitize executed FPAs and the Supplemental Agreement to make them accessible
3. Permitting electronic submission of responses.

This document is being submitted by the Friends of the Mid-Columbia River Wildlife Refuges.

Jan James, President (00janjames@gmail.com)
Friends of Mid-Columbia River Wildlife Refuges
64 Maple Street
Burbank, Washington 99323
(509) 546-8300
Email: mcnaryedcenter@gmail.com
<https://www.facebook.com/FriendsofMCRWR>