

[EXTERNAL] Comment on OMB Control Number "1018-Friends"

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My name is Kathy Bowman.

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I'm writing to comment on OMB "1018-Friends" federal register notice, which closes 1/8/21. (Date of this email is 1/5/2021)

After several opportunities to learn more about this federal register comment opportunity, what I have learned is that there were some commitments made to OIG after an audit, as most agencies do when audits are done.

Apparently, the federal register notice went out without ties to a referenced but not available "policy" at the time, leaving it understandably vague. The vagueness, unfortunately, has caused the Friends groups affected by this notification to spend many hours trying to figure out what you are asking for, as the perception is that OIG told the Service to "get control of the Friends groups" and the Service leapt to do so without thinking about ways to manage the reputational and financial costs of sending out a request for comment so vague that our boards and members began worrying about whether:

- 1) the Service was going to require partner volunteers to do the reporting for them for free with no parameters on what the Service can require;
- 2) the Service was going to demand all funds raised by the nonprofit, not just (as the agreement specifies) that fund raised on Service property be spent on Service projects (501c3 have their own fiduciary responsibilities to the IRS and States and organizations);
- 3) the Service actually knew what a "more granular reporting that our 990 tax reporting" actually looked like.

Had the federal register cart not gone out before the policy horse, the reputational damage to the Service with partners who donate hours of time and dollars to their associated refuges would not be so high.

But here we are, with both damage done by going off half cocked, and with opportunities to make it right among the Service and partners, while fulfilling the Service' self imposed obligation to OIG.

Look: We know you haven't had a Friends program person for a couple of years. We know the Service has spent several years in budget chaos. We know you have to ask "how high" when you are reviewed.

But when you send out the next request for comments, could you be laser focused on 1) what you are requiring, 2) requesting actual actionable information, 3) requiring the liaison to do the focused reporting, and not sucking down non-profit resources to do 3) let's ask for this to show we're asking for it reporting?

We've wasted hours trying to understand what you want. We've asked those questions. We've got no answers.

So here's what I suggest be in the next round.

- 1) Friends coordinator is responsible for working with Friends liaisons (Service staff) to gather very focused information about benefits starting with 990 tax documents provided by the organization and perhaps adding projects planned or conducted and value of goods and services (which again, should already be in Refuge records). The liaisons should provide the reporting, working WITH the partner groups. (Not the other way around.)
- 2) Liaisons already can attend the meetings. If they aren't doing that, perhaps that should be required. They already have access to the minutes and plans of the group, from which they can add the undefined (WE ASKED!) granularity of information. The only thing off the table should be proprietary information like bids for services or hiring outreach. It's fine to say "they plan a fire program, or plan to hire a fundraiser" but specific details of that should not be in the record til they hit the 990s.
- 3) The "register first, policy later" process is NOT normal. I've yet to hear an apology for it. Remember, we are people adding value to the Service as your budgets and staffing decline. The cheapest way to add value is to be respectful to the people who 1) give you money and labor and 2) stand as the Refuge system's staunchest local, state, and national advocates. Whatever policy you finally share with us, make sure that it isn't so tone deaf you drive away your allies!

I think the Service gave itself an out by "looking at the operations of the Friends" groups when it appears that past! practices of gathering information and working with partners were neglected BY the SERVICE, not by the partners.

I get it. It's not an easy time. But you sort of threw us under the bus with your "commitments" to OIG, without thinking about the bigger picture.

A federal register notice to "show accomplishment" while forgetting to provide the policy that's supposed to guide the federal register notice in the first place makes this look like an exercise in CYA rather than actual thoughtful management of anything.

Yeah, I get where you are, I've worked for the feds and seen this scenario before. But never have I seen it so badly handled.

Do better.

Kathy Bowman

There should be no requirement to reinvent the wheel. If you feel you "must" require oversight per OIG's demand (which actually overlaps with IRS oversight already - hence the 990s), then propose

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