

[EXTERNAL] Comments from Friends of Great Swamp NWR reference OMB Control Number 1018-Friends

Laurel Gould <laurelgould44@gmail.com>

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

Cc: Allen Dreikorn <allendreikorn@gmail.com>; Bob Muska <rmuska@verizon.net>; Carl and Kathy Woodward <CandK@woodwards.us>; Dave Katz <dave.katz@att.net>; Jane Bell <janebbell@comcast.net>; John Berry <jr.berry@mindspring.com>; Judi DiMaio <rigsketch@gmail.com>; Laurel Gould <laurelgould44@gmail.com>; Randi Emmer <rsemmer@optimum.net>; Stephen Herdman <sherdman@optonline.net>; susangarretsonfriedman@gmail.com <susangarretsonfriedman@gmail.com>; Tom Gula <tomgula@gmail.com>; Walter Willwerth <wcwillwerth@gmail.com>

 1 attachments (22 KB)

Federal Register Response.docx;

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Reference: OMB Control Number 1018-Friends

Attached please find the comments in response to the Notice of information collection published in the Federal Register.

These comments are from the Board of Directors, Friends of Great Swamp National Wildlife Refuge, Inc. (NJ)

Laurel Gould, Treasurer, Friends of Great Swamp NWR

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Laurel Gould

Friends of Great Swamp NWR

www.friendsofgreatswamp.org

908-236-7166

laurelgould44@gmail.com

To: U.S. Fish and Wildlife Service
From: Friends of Great Swamp National Wildlife Refuge Inc. (NJ)
Date: January 8, 2021
Subject: OMB Control Number "1018-Friends"

Thank you for providing Friends of Great Swamp National Wildlife Refuge (N.J.) this opportunity to comment on the Federal Register notice about the US Fish and Wildlife Service desire to collect information from Friends organizations.

We have grouped our comments into the four areas specified in the Federal Register notice.

(1) FWS wants to know 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.

The collection and reporting of some information would be beneficial to the Service, the Friends, and our Partnership. For example, an annual review of the "Basic program information" would reassure the Service that the Friends organization is operating as a non-profit and filing necessary state and federal forms. Our refuge manager recently conducted this review with our Friends Board. It was a useful discussion and a helpful orientation on the basics of non-profit reporting for our new board members.

The collection of selected key statistics in a uniform format would provide useful information and would facilitate rolling up the numbers to the regional and national levels. This might include the number of Friends groups, members (average number and/or range), net income from retail sales outlets, annual budget, number of volunteers and volunteer hours, funding of refuge projects, to list a few. It would be valuable information for the Service, helping address some of the Inspector General audit findings. The Friends could use this information for publicity, recruiting new members and volunteers, and peer-to-peer discussions.

An Annual Performance Report also would be a useful and practical collection of information. A standard format for this report would be beneficial and helpful to Friends and the Service, making it easier for Friends to compile and for Service review. The report would provide an opportunity for a meaningful and productive dialog about income and sources of income, expenditures, budgets, and projects / programs which benefit the refuge. The Partnership Agreement calls for an annual meeting of staff and Friends board members and the preparation of this report would provide the background information for a mutually beneficial discussion.

Friends already prepare an annual Form 990 which is filed with the IRS and available for public review. Our Friends group prepares quarterly financial reports including a Statement of Financial Position (balance sheet), Program/Project reports and budget updates. These materials are reviewed by our board quarterly. We would be happy to share these documents with Refuge staff who would be welcome to attend these discussions. Before any additional information is required from Friends groups, it would be beneficial to have the Service review what is already easily available and identify specific items which are not already available. It is not clear from the Federal Register notice exactly what kind of information the Service feels would have "practical utility". Adding additional documentation and reports without a comparison between what is needed and what is already available seems burdensome

and may not provide the required information or may result in an overwhelming number of irrelevant details.

(2) FWS want to know the accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used.

It is not clear from this notice what methodology or assumptions were used as there are few specifics and no detail as to what is included in the requested documentation. Regardless, the estimate of the burden, if implemented, would be overwhelming to our all-volunteer Friends group. A volunteer would potentially be asked to spend between 120 and 160 additional hours each year to complete reporting requirements. It is hard to envision finding a volunteer who would be willing and qualified to do that. We also question the assumption: "Total estimated annual nonhour burden cost. None." All volunteer organizations, such as ours, might be forced to hire outside help in order to meet this incredible information reporting burden.

Internal financial control documentation seems like the jurisdiction of the board, not the Service. Recordkeeping requirements documenting accountability for donations and expenditures is also the responsibility of the board.

Assurance documentation that donations, revenues, and expenditures benefit the refuge, estimated at 40 hours per year (per refuge), should be done on an exception basis. Friends groups were established to provide support for a specific refuge. For our Friends group, this is stated in our Mission Statement. Our board has an annual Joint Planning Meeting with the Project Leader and his staff. This Joint Planning Meeting includes:

- A review of past projects, accomplishments, and budget,
- Sharing of lists of potential projects and programs for the coming year,
- Discussion of the benefits, options, and costs for each item,
- An update on refuge and Service priorities for the coming year.

Following this meeting, the Board reviews projected income and operational expenses and determines which of the potential projects can be funded with the resources available. This is used in the preparation of the Friends annual budget which is shared with the Service at our refuge. This annual process with refuge management assures that the Friends budget is supporting the refuge. If something comes up during the year which raises a question of how that expense benefited the refuge, our Friends group could respond with assurance documentation and the Service could make a decision. Having to prepare assurance documentation for everything our group does seems totally unnecessary, incredibly burdensome, and of no practical utility at all.

(3) FWS wants to know ways to enhance the quality, utility and clarity of the information to be collected.

To improve the clarity, develop a standard form to collect the specific information that is determined to be essential or useful. Use the same categories and definitions as those already detailed in the IRS Form 990 and/or information that is included in standard financial reports. This would provide a level of standardization across Friends groups. The Service could request additional detail if needed, but the basic information would be consistent. This would make it less burdensome for Friends groups to provide the information and it builds on what it already reported in the Form 990.

To ensure utility, determine exactly what information is needed and require only that information be reported. Collecting too much information without identifying the benefit or the need is counterproductive and could waste a great deal of Friends and Service time without providing the required documentation.

To improve the quality of the information, provide training opportunities to Friends on how to collect and report information deemed useful and essential. This could be done in conjunction with existing Service partners such as the National Wildlife Refuge Association. Ideally these sessions would be recorded and available on demand for new board members or refresher training.

(4) FWS wants to know how might the agency minimize the burden of collection of information on those who are to respond.

Provide for different levels of reporting requirements depending on the size of the Friends group, based on revenue or net income for example.

Keep it simple: Many groups, such as ours, are all-volunteer and there can be a frequent turnover in board members and officers. Using as much information from the Form 990 or regular financial reports to the board will make it easier to collect and report and the better assurance that it will be reliable.

Start small and build the information requirements as needed. It will be easier to add more requirements once the information has been received and evaluated to determine if it meets the stated needs.

Wait until the digital platform and process has been completed before implementing the collection of information. For an all-volunteer organization such as ours, with frequent turnover in board members and officers, there will be a steep and time-consuming learning curve. It would be helpful if the process started with the digital platform and process in place, tested, and with training for Friends. This will also provide better results for the Service.

Submitted by Laurel M. Gould, Treasurer, on behalf of the entire Board of Directors, , Friends of Great Swamp National Wildlife Refuge, Inc.