

[EXTERNAL] OMB Control Number "1018-Friends"

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

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📎 1 attachments (58 KB)

FARNWR Subject OMB Control Number 1018 FriendsDocument 2020 24802 1082021.doc;

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To Whom It May Concern:

Please see attached comment letter.

Sincerely,

Paula Goodwin

Friends of the Assabet River NWR



Friends of the Assabet River National Wildlife Refuge

*Working with the United States Fish and Wildlife Service
And serving our local communities*

Subject: OMB Control Number "1018-Friends"/Document # 2020-24802

Dear U.S. Fish and Wildlife Service,

Thank you for providing the Friends of the Assabet River NWR this opportunity to comment on the Federal Register notice about the US Fish and Wildlife Service (FWS) desire to collect documentation from Friends organizations. Our Friends group advocates for and supports the USFWS Eastern Massachusetts Refuge Complex at the Assabet River NWR through Visitor Outreach, a Nature Store, and fundraising.

Our Friends group partners with local conservation groups to provide educational opportunities for community members in the region. Each year we contribute financial resources and volunteer hours that provide construction projects for and maintenance of the Refuge. We also collect funds that support the ongoing Blanding's Turtle Repatriation Project at the Refuge.

The Friends of the Assabet River NWR agree with the comments and concerns raised by CORFA/NWRA:

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 cannot be transferred to anyone else.
 - According to the Friends Policy and FPA, FWS cannot 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.

Along with the comments provided by CORFA/NWRA, we want to add that Friends of the Assabet River NWR is proud of our collaborative relationship with the Eastern Mass Fish & Wildlife Refuge Staff. A Friends board member (currently the president) meets weekly with our FWS liaison to discuss relevant issues and activities related to the support of the Refuge.

Our Friends Partnership Agreement was signed relatively recently, in 2019. At our Friends monthly and Annual Meetings, a FWS Refuge Staff liaison is in attendance. At our annual meetings, our financial information is disclosed to our members and the public. Quarterly membership and financial reports are presented at our monthly board meetings in January, April, July, and October.

Given this level of transparency and ongoing communication, we feel we are already providing sufficient information to the USFWS to satisfy any concerns about the proper management of our Friends group without adding the more burdensome reporting requirements that are being considered.

Sincerely,

Paula Goodwin, President

Friends of the Assabet River National Wildlife Refuge
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