

[EXTERNAL] OMB Control Number "1018-Friends"

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

 1 attachments (33 KB)

MWS 2021 Fed Register Response.pdf;

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

Dear U.S. Fish and Wildlife Service,

It has been with concern that I have reviewed the O.I.G report, and the acquiescing response to it by FWS.

I have been volunteering at Muscatatuck National Wildlife Refuge for over 10 years. We are located in rural Southern Indiana. Like most of our volunteers my passion is to preserve natural habitat and wildlife, protect our cultural resources and educate adults and children to the wonders of the nature and history we have inherited. As such I spend my volunteer time as an environmental and cultural educator, I serve as a Visitor Center volunteer, I attend onsite workdays, I assist with two major festivals, I help with several smaller events. In other words I devote many hours on behalf of the Refuge. However, in addition in 2012 I was made treasurer of the Bookstore which I now help co-manage. I also serve on the Muscatatuck Wildlife Society Board and have since 2014 in the capacity of Secretary. Our Board is small our volunteer pool is small, (our annual receipts are such that we are able to file the simple 990 report). Our Society volunteers are overworked and too few just like our FWS staff! For me, any additional request for reports is a MAJOR burden. Yes the Board and Refuge staff get my annual financial report. Fair enough. My Refuge needs me most as an active helper not as a producer of paperwork. I cannot see how the information being sought by the FWS is going to help make my Refuge a better place. Our Board works closely with our Friends liaison and Refuge manager to help wherever and however we can. Delivering more figures is not going to make anything better. We follow the law, we have a signed Friends Partnership agreement. Enough!

Documentation to Collect annually

These items would not be a burden to provide:

- Modifications if any to the Friends Partnership agreement
- State record of our current Incorporation status (Indiana Business Entity Report)
Documents which we are required to keep current are easy to produce for FWS.
- Brief Narrative of benefit provided by the Wildlife Society to Muscatatuck NWR.
This needs to be given at our annual meeting and should be on our website anyway.
I would offer however that the Staff already collect record of volunteer hours served which is a good indicator of the benefit to our Refuge of our small Wildlife Society.
- Annual Year-End Financial Report (including Bookstore financial detail)
Since I am a retired bookkeeper and have been able to produce this for our annual meeting it is an easy thing to provide. (I would offer however that most smaller Friend's groups like ours may not have a pretty annual financial reports even though in no way does that mean they are not keeping financial records nor using good financial practices.)

Items I see no reason to provide and which represent production of documents of little benefit

- Membership and Donor Names
I see no reason the Refuge would benefit from receipt of our membership or donor names. Producing the same is more digital/paperwork and in no way helps our Refuge or Region FWS staff. In addition it invades the privacy of the members and donors who may assume we keep their names confidential.

- Internal Financial Documentation

As Wildlife Society Board Members it is our obligation to manage our finances responsibly and protect the reputation of our organization with adequate financial controls whose oversight is ours not the FWS. It seems to me that the O.I.G. people who seemed alarmed by Ding Darlings expenditures for meals completely fail to recognize that every effective not-for-profit spends money on parties of various types in order to inspire, recruit and reward the volunteers upon whom the organization completely depends both for manpower and donations. Hence the desire to watchdog our Friends groups by requiring more detailed financial reporting.

- Resumes of Staff

Were we large enough to have the luxury to hire staff that would be our responsibility and the service doesn't need to oversee that. Although I would trust that the Friends group would work closely with the FWS Staff in doing so. Do you forget this relationship is built on mutual goals and close working relationships? If there is a breakdown therein, legal requirements of paperwork and procedures are not the cure!

- Supplemental Documentation Quarterly Review
- Supplemental Documentation Annual Review
- Limit documentation to annual review

Burden of Recordkeeping

- FPA- I do not have time to go back and determine the hours we spent on our FPA but it was more than 40.
- Expenditure and Record keeping requirements
40 hours

In closing it would seem to me that the FWS needs to ask itself which is more important, to use the volunteer hours provided by their Friend's groups to staff Visitor Centers, to do maintenance work, to provide interpretation/education to adult and student groups, to build and maintain trails, docks, and other infrastructure, to raise funds for Refuge projects, to build community support for the Refuge/Hatchery, to raise funds and to attract more volunteers to do all of the above, OR to require endless hours of documentation, paperwork and red tape which will discourage, cause burnout, or as has already happened cause some Friends group to give up and disband. Please recognize that many Friends groups like ours may not have Board members skilled with computer spreadsheets or facile with word documents. Case in point: Responding to this Federal Register and OIG report has taken me hours and hours. Most of my Board members will not have joined the Zoom call nor plowed through understanding the documents nor constructed letters in response. But my Board and many other's small group's members are extremely valuable partners to FWS offering many other services to their Refuges/Hatcheries. Please don't throw the baby out with the bathwater by demanding extraneous documents that will do nothing to improve our joint mission of improving habitat for wildlife and increasing advocates for same.

Thank you for your work on this. It can't be a lot of fun!

Sally Crouch,
Muscatatuck Wildlife Society, Board Secretary