

[EXTERNAL] OMB Control Number "1018-Friends"

Steven Byers <stevecofs@gmail.com>

Thu 1/7/2021 6:02 PM

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

 1 attachments (231 KB)

NWOIG Letter in response to Refuge Assoc request.docx;

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Ms. Madonna Baucum, Service Information Collection Clearance Officer;

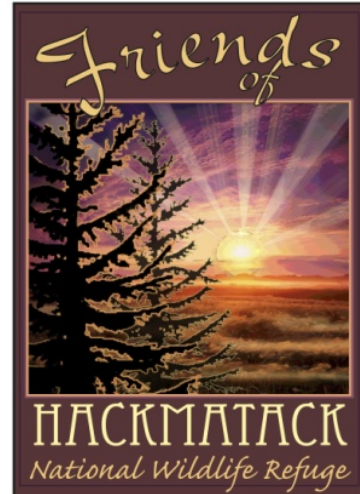
Attached are comments pertaining to the U.S. Fish and Wildlife Service Agreements and Friends Organizations "OMB Control Number "1018-Friends".

Thank you for the opportunity to comment on behalf of Friends of Hackmatack National Wildlife Refuge.

Sincerely,

Steven Byers
Chair, Friends of Hackmatack National Wildlife Refuge
stevecofs@gmail.com

Friends of Hackmatack National Wildlife Refuge
P.O. Box 413
Richmond, IL 60071-0413



Ms. Madonna Baucum,
c/o Info_Coll@fws.gov
Service Information Collection Clearance Officer
U.S. Fish and Wildlife Service

Jan. 7, 2021

Dear Ms. Baucum,

The Friends of Hackmatack National Wildlife Refuge (FOHNWR) has been recognized as an official “Friends” organization by the U.S. Fish and Wildlife Service. The FOHNWR is responding to a request for comment that appeared in the Federal Register (FWS-HQ-NWRS-2020-N145, OMB Control 1018-New) entitled “U.S. Fish and Wildlife Service Agreements with Friends Organizations”.

FOHNWR was established in 2013 as a 501(c)3 not-for-profit organization recognized by the IRS that has pledged to support Hackmatack National Wildlife Refuge. FOHNWR has no staff and its annual budget is approximately \$10,000. In light of these constraints, FOHNWR offers the following comments:

- 1.) FOHNWR is run by an all-volunteer board and does not have the resources or personnel to conduct annual audits of its financial transactions. FOHNWR believes that appropriate budgetary information is available to the Service through our required Form 990 to the IRS, and other yearly-generated documents such as the Annual Financial Statement.
- 2.) FOHNWR is a recognized 501(c)3 not-for-profit organization established to promote conservation within the broader Hackmatack NWR region. As an example, FOHNWR participates in supporting conservation themes such as USFWS Monarch conservation initiative. Our “education outreach area” extends beyond the geographical limits of the refuge. We are in our 6th year of the Monarch Mania Fun Fair, held in a local community park facility. Funds are solicited to support this fair, as well as to support the refuge, and should not be subject to Service oversight.
- 3.) The Board of FOHNWR has a legal and fiduciary responsibility to support the organization. FOHNWR is an independent organization and its responsibilities and governance must first address requirements dictated by our 501(c)3 status. Any additionally requested Service oversight should not interfere - or be designed to be substantially different - from our required IRS reporting.

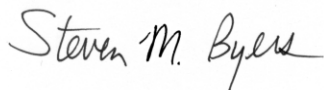
The FOHNWR does have an agreement in place with the U.S. Fish and Wildlife Service and believes strongly that any required information (501(c)3 status, bylaws, and other pertinent

Re: U.S. Fish and Wildlife Service Agreements with Friends Organizations

Information) should be filed when the existing agreement between the Service and the Friends group is updated. Updated IRS Form 990 and a compilation of budgetary transactions can be posted annually as an addition to the existing agreement. Further, monthly or quarterly Treasurer's Reports, which we currently produce, can be made available for review by Service personnel.

In closing, while FOHNWR appreciates the Service goal(s) of compiling information on Friends groups, much of that information is already available within the existing agreements between Friends groups and the Service. The Service should assume the responsibility for compiling that information and not require Friends groups - that have limited resources and volunteer personnel - to do so. Further, FOHNWR does have an agreement with the Service and the format for this agreement should be flexible enough to provide for easy posting of annual updates of existing required information - such as the IRS Form 990. Finally, FOHNWR is an independent not-for-profit organization that should not be subject to oversight beyond the existing agreement between FOHNWR and the Service.

Thank you for this opportunity to comment.

A handwritten signature in cursive script that reads "Steven M. Byers".

Steven Byers
Chair, Friends of Hackmatack National Wildlife Refuge
stevecofs@gmail.com