

[EXTERNAL] 1018-Friends

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To: Info\_Coll, FWHQ <info\_coll@fws.gov>

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I am a volunteer for the Friends of Sherburne NWR. We have a partnership agreement with Sherburne NWR and regularly share our activities and expenditures with the refuge staff at least monthly. Note also, we are all volunteers, there is no staff for the Friends.

I am concerned that many of the OMB requirements are duplicative of legal requirements we already have as a 501c3 organization to the Federal Government. We also have reporting and documentation requirements to the State of Minnesota. These documents and reports are public record and it is those bodies, not the FWS, that hold us unaccountable to the law and to good fiscal practice. Adding parallel reporting, especially for an all-volunteer organization, is excessive. We do make these documents available by web links to our members and the refuge staff already.

Some of the OMB recommendations imply that some kind of on-line or web reporting tool may be developed. Again, keep in mind that we are an all-volunteer organization. So if this is required, keep in mind:

- The information required should be simple and answers retained from year to year as a starting point to reduce data entry
- The timing must match the Federal tax fiscal year (as required by our Federal 990 tax form. If we are forced to re-compute to the Federal agency fiscal year, it is a big burden for no apparent benefit

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