

[EXTERNAL] OMB Control Number "1018-Friends"

Sue Hix <slhix@q.com>

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

1 attachments (208 KB)

Federal Register Comments re OIG Audit Report 2021.pdf;

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

January 7, 2021

Hello:

I appreciate the opportunity to comment regarding OIG recommendations and the information that the USFWS may be requesting of refuge and hatchery Friends organizations as a result of the OIG audit. My remarks are based on a 30-year career in bank human resources, my 20+ years serving in various volunteer leadership positions with the Friends of Sherburne NWR (MN), and more than 6 years serving as a volunteer mentor with the Friends Partnership Mentoring Program.

Keep It Simple In the interest of the USFWS as well as Friends organizations, limit the information collected to the minimum of items necessary to meet audit recommendations. Not only does information collection, organization, and maintenance put a burden on Service sites (many of which are short-staffed), but these tasks also place a burden on Friends organizations that are, for the most part, operated by volunteers. The relatively few Friends groups that have paid executive directors may have an easier time assembling the desired information, but this extra work could result in additional expense to pay staff to meet the new requirements.

Yes, This Is a Reasonable Request—To a Point I am surprised that the Service hasn't already been collecting the most basic information already, but it's a testament to the growth of Service Friends and the good relationships between most Friends and their Service sites that nobody has felt the need to collect such information before. Following are my comments regarding specific points raised in the Federal Register.

#1 – Whether information collection is necessary and whether information collected will be useful:

- **Focus on the basics**—keep it simple, and don't "reinvent the wheel." Solicit information that is readily available or already required of nonprofits.
- **Create a checklist** of required documents. During an annual meeting of Service staff and their Friends, Service staff can check off items that have not been revised or amended and review those that have been.
- **Develop a smooth, transparent process** for annual reporting and rolling up/tallying data.
- **Don't Overstep Your Authority** It is important that the USFWS not ask Friends to provide information that the USFWS does not need to conduct its business. **The USFWS should not require Friends to take actions that would violate their state laws with respect to 501(c)(3) nonprofit organizations.**
- **Documentation to collect/data to maintain and update as needed:**

- How many 501 (c)(3) Friends organizations are supporting refuges and hatcheries.
- How many members those Friends organizations have.
- Copies of Friends Partnership Agreements (FPA) that have been signed by Friends officers and refuge leaders and then approved and accepted by the Service, including accompanying documents:
 - Articles of Incorporation
 - IRS determination documentation
 - Form 1023 or equivalent with related attachments
 - Insurance policies related to the FPA
 - As applicable, description of Service property related to Friends activities
- Form 990 (readily available via IRS website).

Note: The Form 990 should provide all financial information needed from Friends who file this form. There are many smaller Friends organizations that may not prepare such extensive financial information, so make it easy for them to provide the basics.
- List of refuge/hatchery projects supported by Friends funding, including total amount of Friends funds that supported their site during the year.
 - Note: For many organizations, including ours, this is easily available in our annual report. The information may be more difficult for smaller organizations to provide, but if given time to assemble it, they should be able to provide it. This is a great way to showcase the extent and value of what Friends provide to the USFWS!
 - Also: Whether monthly, annually, and/or sometime in between, many Friends routinely share financial information with their Service leaders and liaisons as well as with the public. Please don't add to this burden!
 - And Finally: Friends, like other nonprofits, have administrative costs—for example, Wi-Fi, postage, printing, insurance, salaries/contract costs—that are necessary to maintain the organization in order to support their refuge or hatchery. Don't meddle with this.
- **In General: Beware of inappropriate meddling! Some of the following do not seem to be USFWS responsibilities! Are these even legal functions of the USFWS?**
 - Financial Control Documentation: If deemed necessary, determine what the minimum requirement is—keep it basic! For example, create a checklist of key best practices, including dual control or approvals to authorize expense payments; board approval of financial information presented by treasurer; basic audit function such as review of bank statements and reconciliations by a person other than the treasurer.
 - Documentation for Donations and Expenditures: What does this mean?? Seems like this would be included in basic financial reports maintained by the Friends.
 - Assurance That Donations/Revenues/Expenses Benefit the Service Site: Again, this should be apparent from existing financial reports. Directly or indirectly, these will all benefit the refuge or hatchery.
 - Resumes of Friends Working in Service Facilities: Don't over-step here! Many of these Friends will be subject to DOI background checks anyway. Beyond that, simple conversations between Friends and Service staff should ease any concerns. Rather than being a requirement for Friends, it seems like there should be a Service practice that requires staff to keep track of who—including Friends and volunteers—will be working in their facilities or with their programs.

#2 – The accuracy of our estimate of the burden for this collection of information, including the validity of the methodology and assumptions used:

- **Again, use the KISS principle**—stick to basics, solicit existing documentation whenever available, create templates and checklists, digitize when possible. **This data collection has the potential to create an undue burden on Friends but an even greater potential to bog down and add expense to the USFWS.** I can't really comment on the estimated time burden included in your table, but it seems excessive. As said before, some of this reporting will be a lot more difficult and time-consuming for smaller Friends organizations. **You could end up losing good partners and the funding and volunteer hours they provide!**

#3/#4 – Ways to enhance the quality, utility, and clarity of the information to be collected—and minimize the burden:

- **\$\$\$\$\$** If you aren't careful, this is going to cost you mega time and dollars to set up and even more time and dollars to maintain! It will also create a burden for Friends, the extent of the burden depending on each Friends organization, their experience and sophistication, and their existing processes and procedures. Will most Service staff even be experienced enough to determine the validity and appropriateness of information being submitted?
- **KISS** Once again, find simple solutions—templates, checklists, clear definitions and directions. If possible, find a way for information to be submitted online.
- **Provide Training** Even the most intuitive process will take time and dollars to introduce and implement.
- **Be Forgiving** Allow ample time to convert to new practices and procedures, and provide helpful feedback as needed to obtain desired information. Let Friends know where they can get their questions answered.

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