

## [EXTERNAL] Feedback RE: OMB Control Number "1018-Friends"

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### 1. Basic Program information

- o Public IRS databases and their API's provide the below information based on the legal name of the Friends organization. Therefore there is no need for Friends organizations or FWS field staff to provide basic program information, this can be done entirely by FWS HQ as long as FWS maintain a list of legal names of all Friends Organizations.
  - Incorporation status and EIN
  - 503(C)3 status
  - Last two 990 reports

2. Friends organizations provide on a regular basis (often monthly) to the project leader of the refuge financial reports (balance sheet and P&L) and board meeting minutes. There is no benefit in collecting all this data centrally. There is no benefit to the Service in asking for more detailed financial data from Friends organization (See next points)

3. Grants and project oriented donations to the Friends organization are governed by grantor/donor restrictions and reporting requirements. Since these are legally binding arrangements between the Friends organization as an independent public benefit corporation and the donor/grantor and the Service is no party in these agreements, there is no need to provide additional information to the Service beyond the provided balance sheet, P&L, board meeting minutes and 990.

4. The use of membership fees and non specific donations to the Friends organization not collected on Service property (>99% of donations) is governed by the board and officers of the Friends organization as an independent public benefit corporation. Therefor no further financial details need to be provided to the Service regarding these funds and their use by the Friends organization.

5. Friends organizations should provide quarterly summary reports on the net profit (collected funds minus related expenses) from fundraising events and stores on Service property to the project leader. There is no benefit in collecting transaction level detail regarding those net profits centrally by the Service as long as these details can be provided to the local project leader upon his/her request.

6. The service needs to recognize that over 60% of the Friends organizations are very small with annual gross revenues of less than \$50,000. The IRS recognizes that these small organizations do not have the resources to provide detailed financial information and has created a very

simple online 990N form for these organizations. The Service needs to recognize this and create different requirements for Friends organizations with less than \$50,000 annual gross revenues, Friends organizations with less than \$200,000 annual gross revenues and Friends organizations with more than \$200,000 annual gross revenues (Categories created by the IRS).

7. Local Service staff is typically involved in supervising store staff and store volunteers, there is no benefit in collecting resumes of those volunteers and staff on a central level by the Service.

8. The Service needs to recognize that the Friends organizations provide a tremendous service to FWS without getting anything in return. Friends organizations like to be appreciated by the Service instead of being burdened by paperwork. The recent OIG report is considered an insult by many Friends organizations and reflects a lack of understanding by the OIG of the Friends organizations as independent public benefit corporations.

Sincerely

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Treasurer Friends of TRNWR

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