



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

Memorandum

To: Director

Through: Chief, Office of Policy *Ah Pope 12/24/14* *ofal*

From: (Acting) Assistant Director, Partnerships and Civic Engagement

Subject: Waiver of Policies Prohibiting Donor Recognition on Vehicles

The Office of Partnerships and Philanthropic Stewardship (PPS) is seeking a waiver of policies prohibiting donor recognition on National Park Service (NPS) motor vehicles.

The waiver would permit donor recognition—with or without an associated wrap—on motor vehicles, in the same manner as all other donated or donor-funded items, i.e., with a short, discreet unobtrusive credit line using the donor's name (but not name script or logo), consistent with section 10.2.2 of Director's Order #21: Donations and Fundraising. Logos would *only* be permitted on vehicles donated by Premier Partners in the Centennial Campaign for America's National Parks, and in that case, any logo display would have to be consistent with the Centennial Donor Recognition Plan. This waiver would not change the vehicle identification standards contained in the Personal Property Management Handbook, which is silent with regard to donor recognition on vehicles (see Attachment A).

Current NPS Policy

NPS policy currently prohibits donor recognition on motor vehicles. Director's Order #21, approved July 11, 2008, provides in pertinent part:

10.2 In-Park Recognition.

* * *

Donor recognition is not allowed on motor vehicles or on bricks, benches or other park furnishings.

* * *

10.2.2 Credit line. Recognition for all other donated or donor funded items, including interpretive waysides, recreation equipment and other items that remain in the park, may

include a short, discrete, unobtrusive credit line using the donor's name (but *not* name script or logo).

In addition, between 2004 and 2006, the Director signed a series of memoranda supporting this policy:

- October 5, 2004: Memorandum from Director to Intermountain Regional Director regarding Toyota on-vehicle recognition. The vehicles donated by Toyota were wrapped, the wrap incorporating corporate taglines and slogans as well as scenic images of Yellowstone. This was seen as a clear violation of Director's Order #21, and a potential violation of 36 CFR 5.1 regarding advertising in parks. The remedy was removal of the wraps rather than a waiver.
- January 27, 2005: Memorandum from Superintendent, Yellowstone National Park to the Director requesting a waiver of Director's Order #21's prohibition of donor recognition on vehicles. In the memorandum, the Superintendent indicated that the scenic wraps would be removed by November 20, 2005.
- May 12, 2005: Memorandum from Acting Director to Regional Directors concerning vehicle donations and Government vehicle markings. The Acting Director indicated that scenic wraps and donor recognition were only authorized in the case of Ford Escape Hybrids because of Ford's status as an NPF Proud Partner. The memorandum authorized the temporary placement of scenic wraps without donor recognition on certain donated Toyota vehicles. All other scenic, painted, or graphic wraps were prohibited until a formal evaluation of the medium was completed and new standards established.
- September 21, 2006: Memorandum from Associate Director, Partnerships, Interpretation, Education, Volunteers, and Outdoor Recreation to the Director seeking a waiver of Director's Order #21 to authorize donor recognition (and scenic wraps) on donated Ford vehicles. The waiver was granted.
- August 29, 2011: Memorandum from Associate Director, Park Planning, Facilities, and Lands to Director requesting waiver of the prohibition of donor recognition on motor vehicles and park furnishings. Waiver was approved and authorized application of Clean Cities U.S. Department of Energy logo and "This Vehicle Powered by [fuel type]" on vehicles purchased through Clean Cities grants. Similar markings were authorized on infrastructure funded through the program.

Examples of the vehicles referenced in these memoranda are provided in Attachment B.

Background/Related Efforts

When the memoranda mentioned above and Director's Order #21 were issued, there was concern that wraps, credit lines, logos, and slogans on park vehicles would conflict with the official purpose and use of the vehicles. Additional concerns related to the crossover into advertising and endorsement.

We now have an appreciation of the need for and value of having a class of official vehicles that are seen by the public as accessible and approachable. Research has shown that wrapped vehicles (with or without donor credit lines) are in wide use across the NPS. Parks are using

wrapped vehicles in a variety of ways—as roving ranger stations (for example, Mississippi National River and Recreation Area and Golden Gate NRA roving ranger stations and Santa Monica Mountains SAMObile), and to highlight sustainability (Clean Cities vehicle decals, National Capital Parks-East Smart Cars).

PPS has not received any complaints about any vehicle donor recognition exceptions to date. Indeed, the field and partners have embraced vehicle wraps. The issues of advertising and endorsement are moot given that the prohibition on corporate/commercial logos, slogans, and taglines would continue.

National Park System Advisory Board’s Committee on Partnerships and Philanthropy

Philanthropic and partnership practices and opportunities have evolved since the issuance of Director’s Order #21 in 2008. Recognizing this, the Director asked the National Park System Advisory Board (Advisory Board) to create a Committee on Partnerships and Philanthropy (Committee) to, in part, make recommendations on policies that would bring NPS practices in line with the best practices in philanthropy.

On December 5, 2014, the Advisory Board accepted the report of the Committee (the Report).

The Report provides recommendations related to new business behaviors and best practices in philanthropy and partnerships—including policies on donor recognition—that the NPS should consider as it revises Director’s Order #21.

The Report states the following with respect to donor recognition on motor vehicles:

Encourage donor recognition through naming opportunities

Today, Director’s Order #21 prohibits donor recognition via naming on specific park assets (e.g. benches, motor vehicles, bricks or other core furnishings). Additionally, inconsistency across the system creates a confusing brand and consumer experience. Exceptions have been granted by the NPS in some cases; other parks have created workaround solutions.

The Committee believes that naming opportunities are an appropriate form of in-park recognition and recommends a policy that permits its use. Naming opportunities within the NPS could include, but are not limited to: donor walls, non-historic buildings, rooms, benches, pavers, gardens, *vehicles*, furniture, digital and media platforms, museum collections, programs, endowed positions, park publications, video credits, media, websites and speaking podiums. [Emphasis added.]

As park assets and units are limited, the Committee recommends that all naming opportunities have a clearly articulated and limited duration. Donors must understand that naming a park asset in perpetuity is not permissible.

Support and enable the use of logos

Given the norms and expectations of recognition in American philanthropy today, the Committee believes that the NPS may support and allow the use of logos as a form of in-

park donor recognition. Policy should specifically allow donor logos (e.g. for corporate, foundation and nonprofit partners) to appear in parks.

The proposed waiver does *not* go as far as the recommendations of the Report in that it would lift the prohibition on *logo placement* on donor-funded vehicles *only if* the donor were a Premier Partner, and then the logo could only be displayed in accordance with the Centennial Donor Recognition Plan.

Recommendation

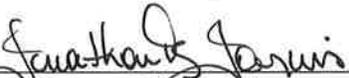
PPS recommends that the waiver be granted.

DECISION

Concur

Decline

Concur with changes/comments Re-evaluate this waiver in 2017.


Jonathan B. Jarvis, Director

1/21/2015
Date

Attachments

Attachment A
Pertinent Sections of the Reference Manual to Director's Order #44 on Personal Property
Management

6.3 -- Items Requiring Special Identification

The following items of property must display special identification:

Motor vehicle identification: Motor vehicle identification must be displayed on all vehicles that we lease or purchase. In accordance with the Federal Management Regulation Part 102-34 - Motor Vehicle Management, all motor vehicles owned or leased by the Government must display motor vehicle identification unless exempted under 102.34-180, 102-34.195, or 102-34.200. The identification must be displayed as follows:

(1) For motor vehicles with rear windows, display:

(a) "For Official Use Only," in letters 1/2 to 3/4 inch high. This has been incorporated into Department of the Interior (DOI) vehicle license plate. There is no need to place in the rear window, if using the new license plates.

(b) "U.S. Government" in letters 3/4 to 1 inch high. This has been incorporated into the DOI vehicle license plate. There is no need to place in the rear window, if using the new license plates.

(c) The full name of the department, agency, establishment, corporation, or service owning or leasing the motor vehicle in letters 1 to 1/2 inch high, i.e. National Park Service.

(2) For other than motor vehicle rear windows, display the motor vehicle identification in

(a) (1) through (3) above, but:

(a) Use letters 1 to 1/2 inches high in colors contrasting to the motor vehicle.

(b) If you use subsidiary words or titles of subordinate units, use letters 1/2 inch to 3/4 inches high.

(c) The preferred material is a decal of elastomeric pigmented film type for ease of application and removal.

(3) Motor vehicle identification should be placed:

(a) On most vehicles, identification must be placed on the left side of the rear window, 1 1/2 inches or less from the bottom of the window.

(b) On motor vehicles without rear windows or where identification on the rear window would not be easily seen, identification must be centered on both front doors or in any appropriate position on each side of the motor vehicle.

(c) On trailers, identification must be centered on both sides of the front quarter of the trailer in a conspicuous location.

Livestock Identification/Markings: Livestock shall be marked through branding, tagging, tattooing, to indicate U.S. Government ownership. Records shall be maintained to fully identify individual animals. Records shall include the property number, pictures (front, side and rear), and a written description of the animal to include markings, scars, and etc.

Watercraft Identification/Markings: Watercraft shall be marked in accordance with the requirements of IPMD 114-60.600 or IPMD 114-60.602.

Attachment B
Wrapped Vehicles



Figure 1. Toyota donated to Yellowstone National Park



Figure 2. Toyota donated to Yellowstone National Park



Figure 3. Ford Escape Hybrid donation: Rocky Mountain National Park



Figure 4. Ford Escape Hybrid donation: National Mall and Memorial Parks



Figure 5. Red Bus Restoration funded by Ford Motor Company as part of the NPF Proud Partner Program.



Figure 6. Red Bus Restoration funded by Ford Motor Company as part of the NPF Proud Partner Program. (<http://imissmetoo.me/2013/09/18/berry-fun-red-bus/>)



Figure 7. Clean Cities Great Smoky Mountains National Park



Figure 8. Mississippi National River Recreation Area



Figure 9. Golden Gate National Recreation Area's Roving Ranger



Figure 10. Santa Monica Mountains National Recreation Area's SAMobile



Figure 11. National Capital Parks-East



Figure 12. Coca Cola Recycling Support for National Mall and Memorial Parks - Trailer