

Reference Manual 7

Volunteers-In-Parks

Interpretation, Education, and Volunteers

Approval By: _____

Effective Date: _____

FINAL VERSION FOR SIGNATURE

Volunteers-In-Parks

Interpretation, Education, and Volunteers

Table of Contents

Chapter 1. Background, Purpose, and Authorities	4
Chapter 2. Definitions	7
Chapter 3. Program Administration	9
Chapter 4. Recruitment	17
Chapter 5. Onboarding	28
Chapter 6. Administrative Requirements	34
Chapter 7. Reimbursement	47
Chapter 8. Program Audit, Monitoring, and Evaluation	54
Chapter 9. Termination of Volunteer Service	56
Chapter 10. Reporting	58

Reference Manual 7 - Chapter 1: Background, Purpose, and Authorities

Background

(see DO-7, § 1)

Volunteering is an American tradition that has made an immeasurable contribution to communities, organizations, and individuals throughout the country. Volunteers are integral to the success and function of the National Park Service (NPS). Authorized by [Public Law \(PL\) 91-357](#), the NPS Volunteers-In-Parks (VIP) Program can accept and use voluntary help and services from the public in a way that is mutually beneficial to the NPS and the volunteer.

Through the VIP Program, the NPS works hand-in-hand with communities to engage people of all ages and backgrounds in meaningful and mutually beneficial volunteer opportunities. Volunteers are accepted without regard to race, creed, religion, age, sex, sexual orientation, color, national origin, or disability. Under the legislation, volunteers are not subject to Office of Personnel Management (OPM) regulations for recruitment because they are not federal employees for any purposes other than liability, tort claims, and workers' compensation. However, volunteers are required to adhere to workplace policies such as, but not limited to: facility access, anti-harassment, standards of performance or conduct, and safety.

Purpose

(see DO-7, § 1)

[Director's Order #7: Volunteers-In-Parks](#) (DO-7) provides direction to NPS staff who are responsible for and involved in implementing the VIP Program in parks and programs. This document, **Reference Manual #7: Volunteers-In-Parks (RM-7)**, provides information needed to implement the requirements of DO-7 to help parks and programs plan and manage their volunteer programs.

[InsideNPS](#) [internal link] and the [WASO Volunteers-In-Parks SharePoint](#) [internal link] contain helpful information for volunteer programs. Links to other supporting resources are provided throughout this document.

Authorities

(see DO-7, § 2)

Public Law 91-357, more commonly known as the **Volunteers in the Parks Act of 1969** ([54 USC 102301](#)), was enacted in 1970. An amendment ([PL 98-11](#)) dated March 28, 1983, extended this program to include components of the National Trails System (e.g., national scenic, national historic and national recreation trails) in the National Trails System Act.

The **Departmental Appropriations Bill** ([PL 102-154](#)), dated November 13, 1991, allows permanent use of volunteer funding for “paying costs incidental to the utilization of services contributed by individuals who serve without compensation as volunteers in aid of work for units of the Department of the Interior.” Because volunteerism intersects with other programs and functions within the NPS, additional regulations may apply.

Establishing Local Policy

The overarching policies and procedures needed to operate an effective, consistent volunteer program are documented in DO-7 and this reference manual. Unique circumstances within parks and programs, however, require local-level decisions. Therefore, each participating park or program must establish local policy, as an extension of DO-7 and RM-7, on its engagement of volunteers. Local policy should include the park or program’s standard operating procedures and may be referred to as the volunteer handbook. Local policies are authorities delegated to the Superintendent/Manager of each park unit or program office for which they are accountable, and should include guidance on:

- Position management (including certification of volunteer service descriptions)
- Vulnerable populations (e.g., children/youth, court-ordered community service, inmates, etc.)
- Onboarding process
- Orientation and training
- Uniform management and disposal
- Housing
- Allowable expense types and limits for reimbursements (e.g., cap on per diem)
- Limited liability and/or thresholds for volunteer use of personal property
- Awards and recognition
- Termination

Local policy is considered “pre-decisional documentation” by the DOI solicitor, supports audit requirements, and helps the park or program proactively reduce guesswork, risk, and administrative time. This local policy is tailored to the park or program’s management of its volunteer workforce within the parameters of applicable laws,

regulations, and policies, and should be created through a local strategic planning process involving representation of the involved parties across the park/program.

Reference Manual 7 - Chapter 2: Definitions

(see DO-7, § 4)

The following terms are used throughout this Reference Manual:

- **Volunteer:** As defined in [29 CFR 553.101](#), a volunteer is “An individual who performs service under a current, signed individual or group volunteer service agreement without promise, expectation, or receipt of compensation for services rendered is considered to be a volunteer, provided such service lies within the scope of statutes authorizing the bureau’s or office’s use of volunteers.”
Volunteers are members of the public and are not considered employees except in the cases of liability, tort claims, and workers’ compensation. While volunteers are not NPS employees, the same workplace policies apply, such as but not limited to: facility access, anti-harassment, standards of performance or conduct, and safety. Volunteers may also be referred to as “VIPs.”
- **Volunteers-In-Parks/VIP Program:** The servicewide Volunteers-In-Parks Program is referred to as the “NPS VIP Program.” The term “volunteer program” refers generally to volunteer programs within parks and programs.
- **WASO IE&V:** The Washington Support Office Interpretation, Education, and Volunteers Directorate, which oversees the administration of the NPS VIP Program, is referred to as “WASO IE&V.”
- **Volunteer management:** Volunteer management is the strategic management of volunteer resources. Volunteer management is also known as volunteer engagement, volunteer coordination, and volunteer administration (see the [Program Administration section](#) for more information).
- **Volunteer manager, coordinator, and supervisor:** The terms volunteer manager, administrator, and coordinator are often used interchangeably throughout the field of volunteer administration. For purposes of this document, “volunteer manager” will be used to refer to the person overseeing the volunteer program at a park or program. Park and program divisions or work groups may have volunteer coordinators. “Volunteer supervisors” will be used to refer to the person directly overseeing the volunteers’ work.
- **Service description:** The terms volunteer position description, job description, service description, and description of service are used interchangeably in the field. This document will use the term “service description.” The service description is a part of the volunteer service agreement.
- **Volunteer service agreement:** These documents govern the relationship between the NPS and the volunteer or volunteer group. The volunteer service agreement includes the OF301a form and for volunteer groups the OF301b form, as well as service description, and job hazard analysis (see **Formalizing the**

NPS/Volunteer Relationship: [Volunteer Service Agreements](#)). This may also be referred to as a “service agreement.”

Reference Manual 7 - Chapter 3: Program Administration

(see DO-7, § 3)

Roles & Responsibilities

Volunteerism is a core strategic function where all levels of the NPS organization must participate and can find mutual benefit and meaning in stewardship and service. The volunteer ecosystem is managed collaboratively at multiple levels.

Washington Support Office

The Servicewide VIP Program Manager in the WASO IE&V Directorate is responsible for the overall coordination and guidance of the program. The Servicewide VIP Program Manager performs the following duties:

- Provides information on the VIP Program to the NPS Director, Department of Interior leadership, and Congress.
- Develops strategic direction and establishes operational standards on volunteer management.
- Manages servicewide policy related directly to DO-7 and RM-7 and coordinates with other NPS directorates where policies intersect.
- Coordinates servicewide programming, volunteer initiatives, and special programs.
- Works with other agencies and outside organizations in the field of service and volunteerism.
- Monitors volunteer management activities through annual reporting and evaluation practices.
- Distributes funding to regions and programs and monitors their use.
- Maintains a national VIP recruitment program, including management of Volunteer.gov.
- Works with the National Park Foundation and other partners on national resource development efforts and special initiatives.
- Facilitates regular and ongoing internal communication with regions and the field through various channels.
- Coordinates with national Office of Communications on all external volunteer matters of national significance.
- Advocates for volunteers, volunteer managers/coordinators, and volunteerism at all levels of the NPS.
- Develops the training content and infrastructure and delivers technical assistance to the region, parks, and programs.

- Coordinates national recognition and awards including the George and Helen Hartzog Awards for Outstanding Volunteer Service, America the Beautiful pass, etc.
- Supports national and regional offices on matters of volunteer health, safety, and wellness
- Coordinates national offices and programs with volunteer activities that are not otherwise connected through regional administrative support structures.

Regional Offices

Regional responsibility for the NPS VIP Program rests with the Regional VIP Manager. Volunteer program management duties are assigned by the Regional Director to a particular position and are included in the service description and critical results of that position. Regional VIP Managers perform the following duties:

- Coordinate regional George and Helen Hartzog Awards for Outstanding Volunteer Service award and submission process.
- Provide training to volunteer managers and assistance to the parks and regional programs as requested.
- Monitor the volunteer programs by conducting routine program assessments in the region.
- Ensure all reporting requirements are met.
- Conduct regional strategic planning process and support park strategic planning processes.
- Assist with the coordination of partnership-based and/or servicewide volunteer programs operating within the region.
- Facilitate and support the coordination of regional and national volunteer-related projects and initiatives.
- Compile VIP funding requests from the parks and programs.
- Allocate VIP funds to parks and programs and monitor their use.
- Serve as a liaison between the region, parks and programs, and WASO.
- Answer public inquiries regarding the programs in the region.
- Provide support to parks and program offices on matters of volunteer health, safety, and wellness.

Volunteer Programs at Parks, National Offices, and Special Programs

Each park, national office, or program (such as the Office of International Affairs, National Heritage Area, National Trails System, National Wild and Scenic Rivers System , etc.) volunteer program is a local operation and handles recruiting, selection, training, recognition, and many other aspects of a volunteer program locally. Each park or program with a volunteer program must have a designated volunteer manager. The individual in this role is assigned by the Superintendent/Manager and is responsible for

volunteer program administration. The duties should be included in the individual's service description and should be an element of their performance plan.

The volunteer manager may be located in any division, depending on the characteristics of the particular volunteer program and where the volunteer manager would be most effective. Regional offices support parks, regional offices, and programs. WASO IE&V supports other national-level divisions, offices, and programs. Wherever managers are located in the organizational structure, they must maintain contact with the Regional VIP Manager or Servicewide VIP Program Manager to ensure proper program procedures are followed.

Titles may vary, but for consistency in standards and training the two primary roles—volunteer manager and volunteer supervisor—are outlined below.

Superintendents

The Superintendent/Manager has ultimate responsibility for the VIP program in their park or program. Per DO-7, Superintendents/Managers perform the following duties:

- Designates a volunteer manager, who will be responsible for administering the VIP program at the park or program level.
- Ensures adequate training and supervision has been provided for all volunteers and volunteer managers.
- Approves local policy for the volunteer program, including guidelines for volunteer reimbursement and housing, whether persons convicted of crimes may serve, and whether volunteers may operate government vehicles.

Volunteer Managers

The volunteer manager develops and operates a volunteer program matching the conditions and needs of the particular park or program. Volunteer managers perform the following duties:

- Assist staff with assessing needs and identifying work that can be accomplished by volunteers.
- Advise staff on the proper engagement of volunteers.
- Provide guidance, training, and technical assistance to staff members who supervise and work with volunteers to ensure compliance with volunteer program policies.
- Recruit for specific volunteer positions.
- Coordinate volunteer orientation and training, volunteer recognition, and overall program evaluation.
- Establish volunteer records management plan and ensure files contain all pertinent information, such as local policy, needs assessment information, service descriptions, recruiting information and strategies, and required training materials.

- Ensure that electronic and paper records containing PII data are secured and managed in accordance with requirements in NPS approved systems.
- Account for the safety and wellness of volunteers and those working with volunteers through the use of NPS best practices.
- Directly supervise some volunteers, including leading and mentoring volunteers.
- Develop relationships with partners and communities to support volunteer engagement.
- Handle internal and external correspondence related to the volunteer program, including supporting nps.gov content for their particular park or program's volunteer engagement.
- Develop and submit program funding requests and program reports to the Regional VIP Manager.
- Monitor and record the use of park or program volunteer funds.
- Keep staff informed of trends and procedures related to the use of volunteers.

Although volunteer managers are responsible for the overall coordination of volunteer programs, they are not the only people who may directly supervise volunteers. Staff members who are directly responsible for the volunteers' work supervise those volunteers.

Volunteer Supervisors

Volunteer supervisors must have a clear understanding of their roles and responsibilities when supervising the volunteers entrusted to them and must be qualified to supervise the activities volunteers will be completing. Supervisory tasks are determined by each park or program. Supervisor/volunteer staffing ratios and percentage of time available to supervise volunteers should be considered when assigning Volunteer Manager and Volunteer Supervisor duties. Volunteer supervisors may perform the following tasks:

- Write service descriptions and share them with volunteers.
- Introduce volunteers to staff members with whom they interact.
- Prepare the work area.
- Explain the supervision and evaluation systems.
- Explain risk management issues.
- Share relevant policies and procedures.
- Provide ongoing training, on-the-job coaching, informal appreciation, materials, and information to support volunteers' efforts.
- Account for the safety and wellness of volunteers through the use of NPS best practices.
- Report individual and overall volunteer hours and the outcome of volunteer work to the park or program volunteer manager.
- Recognize volunteers for their work efforts.

Volunteer supervisors are encouraged to update the volunteer's record and conduct annual volunteer performance reviews with a written evaluation of the volunteer's work to ensure high-quality volunteer performance and experience.

Volunteers, in the role of volunteer leader, can lead the work of other volunteers, but all volunteer work must ultimately be supervised by qualified NPS staff and/or the authorized partner staff. Personnel decisions, such as termination of volunteers, should be made in consultation with the NPS volunteer supervisor.

Volunteer Partnership Organizations

A nonprofit organization, such as a cooperating association, authorized philanthropic partner, conservation corps, or partner volunteer organization may, under the appropriate formal agreement (including cooperating association agreement, philanthropic partnership agreement, or federal financial assistance agreement, such as cooperative agreement), manage or assist in managing an NPS volunteer program nationally, regionally, or locally, with oversight conducted by the NPS. The agreement must clearly present procedures for communicating with and supervising volunteers and for managing volunteer projects, personnel records, reporting, security, liability, and co-branding when applicable. The agreement may not be used to circumvent the partner's need for insurance coverage or other requirements. The reporting section of the agreement should clarify whether volunteer projects will be reported under the annual partner report or the annual VIP report (preferred); volunteer numbers should not be duplicated across multiple NPS reports.

Partner volunteer supervisors of NPS volunteers are held to the same expectations and policy requirements outlined in RM7. Parks and programs are ultimately responsible for upholding the standards of volunteer supervision and program management. Although volunteer supervision and management may be delegated to the partner through a formal agreement, a partner may never be granted the authority to sign NPS volunteer service agreements.

Parks and programs wishing to create an agreement with a partnership organization should work with the appropriate regional office contact for the type of agreement (including cooperating association agreement, philanthropic partnership agreement, or federal financial assistance agreement, such as cooperative agreement).

Volunteers serving under these partnerships are NPS volunteers and must have a valid NPS volunteer service agreement.

See **Types of Volunteers: Partner Organizations** for additional information on working with partners.

See Director's Order #21: Philanthropic Partnerships ([DO-21](#)) for additional information or consult the park or program's or region's partnership coordinator.

See Director’s Order #32: Cooperating Associations ([DO-32, Section 4](#)) for additional information about cooperating association activities.

Funding

Congress appropriates funds each year for the NPS VIP Program (see **Authorities**).

VIP funds are one-year “Operation of the National Park System” (ONPS) funds, allocated annually by Congress for the purpose of maintaining a National Park Service volunteer program. Funds may be used in accordance with federal appropriations law, agency policy, and Congressional intent to support volunteers and volunteer program management, including housing, volunteer transportation, volunteer coordination, purchase of uniforms and recognition items, volunteer and volunteer manager training costs, and similar expenses (see **Recognition and Awards**). VIP distribution funds may not be used for paying staff or for food with some exceptions (see **NPS-Provided Food**).

Additionally, other NPS funding sources (e.g., Servicewide Comprehensive Call project funding, recreation fees, commercial fees, and Operation of the NPS (ONPS) and non-NPS funding sources (e.g., National Park Foundation or other partners, friends groups, and direct donations) may be used to support volunteer programs.

Allotment of VIP Funds

VIP funds are allotted to each region based on a formula determined by servicewide and regional volunteer leadership. Regional volunteer program managers distribute these funds to parks (excluding national heritage areas) and monitor their usage throughout the fiscal year.

NPS-Provided Food

In general, an agency may not use appropriated funds to purchase items considered personal expenses, such as food, without specific authority (see [Government Accounting Office Decision B-301184](#), January 15, 2004).

Limited exceptions may permit the NPS to provide food, such as the following examples:

- In the case of awards ceremonies and training events, meals and light refreshments may be purchased by the park and program with ONPS funds (see [Acquisition Policy and Procedures Memorandum 1443.07-03](#) [internal link] and the [Government Accounting Office decision tree](#) for additional guidance)

- The purchase of water and other personal protective items for volunteer activities and events is allowed because it is considered personal protective equipment (see [Director's Order #50B: Occupational Safety and Health Program](#) for additional information).

In any scenario, park and program staff should consult with their budget or finance staff before purchasing any food directly.

An alternative solution is for a friends group or philanthropic partner to pay for food directly according to [Director's Order #21: Donations and Philanthropic Partnerships](#).

Incidental Expenses

VIP funds can also be used to cover incidental expenses directly related to the operation of the VIP Program. These expenses include supplies and materials, medical exams (if required for specific positions), fingerprints, volunteer training tuition and materials, uniforms and costumes, local transportation, housing (including off-site housing), tools and equipment, and other similar expenses.

Program Management and Supervisory Training

(see DO-7, § 15)

Volunteer Program Management Training

Introductory course: All new volunteer managers are required to take the self-paced [Introduction to Volunteer Program Management Requirements](#) course in DOI Talent within two months of being assigned volunteer program management duties. All volunteer managers, volunteer supervisors, and other staff supporting the volunteer program will also benefit from this training.

Ongoing training: Each region will provide volunteer program management training annually or partner with other regions to offer training. These trainings may include basic volunteer program management overviews, refresher courses, and/or advanced volunteer program management trainings. Volunteer managers are strongly encouraged to attend a regionally hosted training within a year of taking on volunteer program management duties. If they are unable to attend in person, they should contact their Regional VIP Manager to discuss other training opportunities that can be completed locally or virtually. These may include NPS or non-NPS-provided training modules.

Volunteer Supervisor Training

Supervisory training is required for anyone supervising volunteers of any number whose combined hours of service equal or exceed 6,261 hours per year (equal to three full-time equivalent or FTE). It is recommended for all volunteer managers and supervisors.

Supervisory training is offered in a variety of formats and from many vendors. Volunteer supervisors are eligible for the WASO-funded New Supervisor Development Program, which fulfills this requirement. Training opportunities are listed on the [Common Learning Portal](#).

Reference Manual 7 - Chapter 4: Recruitment

(see DO-7, § 13)

Who is an NPS Volunteer

Volunteers are individuals or groups of individuals who perform work for and are under the direction of the NPS for which they receive no financial compensation from the NPS. Individuals, groups, and children must volunteer under a signed and current volunteer service agreement (see **Formalizing the NPS/Volunteer Relationship: Volunteer Service Agreements**).

While volunteers are not NPS employees, the same workplace policies apply, such as but not limited to: facility access, anti-harassment, standards of performance or conduct, and safety.

Recruiting for Diversity, Equity, Inclusion, and Accessibility

In support of the National Park Service's **core values** [internal link] and commitment to diversity, equity, inclusion, and accessibility (see **Director's Order 16B**), the VIP program seeks to actively engage the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, with particular emphasis on historically excluded communities. The VIP program seeks new and innovative ways to diversify our volunteer base, to create **inclusive work environments and service experiences** [internal link], and to eliminate barriers to inclusion for all our volunteers. The VIP Program recognizes that the full potential of volunteerism in national parks cannot be achieved unless we welcome and embrace the full spectrum of an increasingly diverse and multi-cultural American public.

Volunteer.gov

Volunteer.gov is the official recruitment portal for all federal land management agencies: all NPS volunteer opportunities must be posted here. Other supplemental tools used for recruiting volunteers, such as local advertisements, must refer back to Volunteer.gov so that volunteers can officially apply online. The Regional VIP Manager (or Servicewide VIP Program Manager for national programs) will assign a username and password for

Volunteer.gov (see the [Volunteer.gov resource page](#) [internal link] for more information, training materials, and instructions).

Types of Volunteers

This following section is a non-exhaustive list of the common types of volunteers.

Children, Youth, and Family Volunteers

Like all volunteers, children, youth, and families volunteering for the NPS must have a signed and current volunteer service agreement that clearly and appropriately identifies and describes their duties. All duties performed by volunteers who are minors must be safe and appropriate for the age and the individual (see **Volunteers and the Fair Labor Standards Act** and **Safeguarding Children, Youth, and Family Volunteers**).

Volunteers under 18 years of age must have signed permission from their legal guardian on the volunteer service agreement that includes a full description of duties.

K-12 Education Volunteering Programs or Service-Learning Volunteers

Service-learning is the formal integration of community service into student education. Service-learning connects students with the community in partnerships that provide effective and far-reaching assistance to address local needs while meeting existing academic goals. It is important programs that engage K–12 students are designed with their health and safety in mind, not just the educational benefit. This goes beyond the parental approval currently in DO-7 to include age-appropriate activities.

Accredited Volunteer Internships

Volunteers who are students may have the opportunity to receive academic credit from their academic institution for their work with the NPS. Accredited volunteer internships create learner-centered opportunities for students in higher education to forge personally meaningful connections with park resources and staff and foster a deeper understanding and appreciation for the nation’s intertwined natural and cultural history found in national parks. For interpretation or educational services, an Interpretation and Education Services Agreement with a higher education institution may be used to establish a foundational framework to guide and enhance NPS partnerships with an institution of higher learning. Alternatively, or for other career fields, the higher education institution may request the NPS utilize an agreement unique to the institution. Any agreement should outline the internship requirements and expectations for both NPS and the institution of higher learning. Accredited VIP internships can provide high-quality, meaningful educational experiences and interpretive services in national parks and are encouraged.

Cooperating Association Employees

Cooperating association employees who perform work on behalf of the NPS as volunteers must function under a signed and current volunteer services agreement. This type of arrangement is permitted only in these circumstances:

- The NPS and an association mutually agree association employees may perform work on behalf of the NPS
- The association employees performing such functions receive appropriate training and work under direction from the NPS

Association employees' hours are not counted as volunteer hours if their salary costs are already reported as Aid to the NPS (NPS Form 10-40) through agreements set up between the NPS and cooperating association partners. Separately, associations may operate their own volunteer programs administered independently of the NPS VIP Program to assist with Association activities. In this instance, volunteers are not considered VIPs for purposes of this policy. The association may report those volunteer hours as indirect aid-to-NPS, but the park or program may not count those hours as VIP hours.

See [Director's Order #32: Cooperating Associations](#) (DO-32, Section 4) for additional information about cooperating association activities.

Partner Organizations

To be considered an NPS volunteer, individuals serving in coordination with a partner organization (including authorized philanthropic partners such as friends groups, or partner volunteer organizations such as trail associations) must perform work for and under the direction of the NPS. These individuals must have a signed and current NPS volunteer agreement . It does not matter if the person receives pay, work credit, academic credit, or other types of compensation from sources outside of the NPS. If the NPS funds are not paying that person for their work, they typically should sign a volunteer service agreement (see **Volunteer Partnership Organizations”** and **“Who is an NPS Volunteer**).

As with other organizations, employees (or volunteers) of park or program friends groups or other organizations operating under a philanthropic partnership agreement may be interested in volunteering in support of NPS programs or projects. Work performed by employees, volunteers, or members of friends groups and partners under the direction of and for the benefit of the NPS, as described in the volunteer service agreement, may be counted as NPS volunteer time. This is separate from volunteer work they may do to specifically support the philanthropic partner. Volunteer managers and supervisors must ensure duties and hours performed by these individuals are reported separately to the appropriate organization (NPS or philanthropic partner).

Time spent serving on the board of friends groups or philanthropic partners is not considered NPS volunteer time. Further, fundraising, a common function of friends groups and philanthropic partners, is a prohibited activity when on duty as an NPS volunteer.

See [Director's Order # 21: Philanthropic Partnerships](#) (DO-21) for additional information or consult the park or program's or region's partnership coordinator.

NPS Employees as Volunteers

The NPS does not allow an NPS employee to serve as a volunteer in a manner that takes advantage of an employee's willingness to perform their paid work without pay. Generally, an NPS employee can serve as a volunteer as long as the duties they perform as a volunteer are not the same types of duties for which they are paid. For example, an administrative assistant in the superintendent's office can volunteer to give an interpretive program in a park on their own time, but cannot volunteer to do administrative work for another park manager. Employees cannot volunteer in their paid position while on furlough.

For example, the NPS prohibits allowing seasonal employees to volunteer in roles similar to their paid work (including collateral duties) once a seasonal position is terminated. Issues associated with people volunteering before or after temporary appointments of less than 1040 hours may appear to contradict the Fair Labor Standards Act (FLSA) and take advantage of an employee's willingness to work without pay. Affected individuals include those who have been offered and have accepted a temporary position of less than 1040 hours or who are eligible for reappointment into a position that requires less than 1040 hours in a year. This does not preclude employees from volunteering in the same park or program for an entirely different.

Individuals must never be signed up as volunteers for the purpose of attending training required for a position for which they will be paid. Additionally, they must never be signed up to volunteer for the position for which they were expecting to be paid over the same time period, but for which their background investigation has not yet cleared. That individual may volunteer in a completely different position, provided the alternate position does not also require a background investigation.

Family Members of NPS Employees

Relatives of NPS employees may serve as volunteers if they are qualified for the position, including health and physical condition requirements, and follow proper application procedures. However, the volunteer position may not be supervised by an immediate family member, or the direct report of an immediate family member, without consulting DOI's ethics standards or an ethics counselor. If reimbursement is involved, an ethics counselor should be consulted before a volunteer service agreement is signed. A conflict of interest or impartiality issue could result if a relative or household

member of an employee were to benefit financially from the program. Even the appearance of a conflict of interest is a violation of DOI's employee conduct policies and should be avoided.

Family members must never be signed up for the sole purpose of being permitted to use government equipment, such as driving or riding in government vehicles or borrowing landscape or recreational equipment.

Foreign Nationals

(see *DO-7*, § 5.8)

Generally, non-US citizens may become NPS volunteers as long as they are not being compensated for their volunteer work. It is illegal for foreign nationals to receive any form of payment, whether for housing, meals, or other types of compensation, including reimbursements. Legal permanent residents (informally called "green card holders") or persons possessing a J-1 or F-1 visa are exceptions to this compensation rule. There may be other visa types and/or programs authorized by the Department of State or Department of Homeland Security that allow for lawful work in the United States. Parks and programs should check for these exceptions and provide proof if they authorize reimbursement.

See [more information about US visas](#) on the Department of State website.

International Volunteers-In-Parks (IVIP)

The NPS Office of International Affairs manages the International Volunteers-In-Parks (IVIP) program, which permits citizens from other countries to become NPS volunteers. Although international volunteers can serve as NPS volunteers, there are specific legal requirements from the Department of State and United States Citizen and Immigration Services. Due to the complexity of visa and immigration policies, the NPS IVIP coordinator plays a critical role in assisting the NPS with foreign applicants. Applicants need a J-1 visa to receive any compensation from any US funding source (including housing, recognition items, etc.). The one exception is for F-1 students with training approval from their universities. Before bringing on international volunteers (either in person or virtually), NPS staff should contact the IVIP coordinator, who will help determine whether or not individuals are eligible to legally volunteer.

For a complete information packet to begin an IVIP program, contact the international volunteer manager in the Office of International Affairs or visit the [International Cooperation website](#).

Who Is Not an NPS Volunteer

Anyone not serving under a signed volunteer service agreement is not an NPS volunteer (see **Who is an NPS Volunteer**).

Furthermore, Department of the Interior requirements state any person receiving taxable compensation originating from an NPS fund source may not be considered a volunteer. Therefore, any person serving under a financial assistance agreement where the service is funded by NPS funds is not considered an NPS volunteer and should not sign the NPS volunteer service agreement. The park or program should review the terms of agreement with the organization to determine if the participant is receiving a wage, stipend, and/or living allowance (also known as direct costs). If yes, the individual is considered a service contractor whose work is paid under the agreement. This individual is not a volunteer. The participant's official employer of record is the partner provider; the partner is required to have liability for this type of personnel.

For example, if the NPS funds a youth organization using a financial assistance agreement to provide wages, stipends, and/or living expenses, the youth is not an NPS volunteer, and their work hours cannot be counted as VIP hours. In addition, these participants must be covered for liability through the youth organization, not the NPS, as stipulated in the legal agreement between the NPS and the organization.

Volunteer Qualifications

(see DO-7, § 5)

Basic Qualifications

Volunteers are recruited and accepted from the public without regard to race, creed, religion, age, sex, sexual orientation, color, national origin, disability, gender identity, or OPM classification laws, rules, and regulations. Volunteers must not engage in any work they are not qualified to perform. They must be adequately trained and feel comfortable doing and willingly agree to do the work.

Health and Physical Condition Qualifications

When formulating the volunteer service description and job hazard analysis or job safety analysis (JHA or JSA), parks and programs must determine and document the health and physical condition requirements for completing the activities required and at the project location, as well as required qualifications (knowledge, skills, experience, ability), and required training, certifications, or licenses. It is the responsibility of the volunteer manager or the volunteer supervisor to ensure volunteers are educated with this information. When signing the OF301a or OF301b, the volunteer must select "I understand the health and physical condition requirements for this position, and I know of no medical condition or physical limitation that may adversely affect my ability to

provide this service.” The NPS is not required to provide accommodation to volunteers unable to perform the duties of the position.

Fit for Duty Qualifications

Parks and programs have the authority to request medical clearance of volunteers only if the volunteers are performing duties equivalent to a staff position for which there are medical qualifications, such as firefighting. For example, it is not permissible to apply a fitness standard to a volunteer when there is no equivalent standard for staff performing the same duties. To document volunteer medical clearance for applicable positions, parks and programs may follow the same process used for staff or may have the volunteer complete a **Self-Identification of Disability form (SF-256)**, request a doctor’s note (using medical clearance form), or obtain a medical examination at the government’s expense.

See **Director’s Order #57A: Medical Standards Program** for more information.

Individuals Convicted of Minor Crimes

Individuals convicted of minor crimes who are participating in court-approved probation, work release, or alternative sentencing programs may serve as volunteers at the discretion of the Superintendent/Manager. Generally, a person who has been convicted of a felony, violent crime, crimes against persons, or crimes involving the use of a weapon will not be accepted in the NPS VIP Program. However, the Superintendent/Manager may permit that person to volunteer based on an analysis of the nature of the crime, date of conviction, evidence of rehabilitation, or other factors. It is the volunteer’s responsibility to ensure proper documentation of required hours and to keep these records for their own needs.

Volunteer Activities

(see *DO-7*, § 6)

Volunteers may be engaged in nearly all parts of park and program operations in nearly any type of work, as long as it is work that:

- Does not displace paid employees (see **54 USC 102301(a)**)
- Would not otherwise be completed during a particular fiscal year
- Enables paid employees to accomplish work that would not otherwise be completed during a particular fiscal year
- Does not include commissioned law enforcement duties, hazardous duties, or policymaking, with some additional qualifications:
 - Volunteers who perform work that requires additional training or certification must receive the same level of certification and training as paid employees.

- Volunteers may apply pesticides or herbicides in the course of their duties, provided they are at least 18 years of age, are willing, and have the proper training, certification, and supervision (see Director’s Order #77-7: “Integrated Pest Management”).
- Hazardous duty is duty performed under circumstances in which an accident could result in serious injury or death (see the [OPM definition of hazardous duty](#)). However, volunteer service by individuals with the required credentials and certifications to perform certain hazardous duties may be accepted upon Superintendent/Manager approval.
- Volunteers should not perform law enforcement duties such as serving as a backup on patrol, riding along in an on-duty law enforcement vehicle on patrol, and issuing citations. Volunteers could perform protection work, however, such as traffic/parking control, backcountry roves, and clerical support.

Volunteers may sell permits and passes, and collect fees, as authorized by the Federal Lands and Recreation Enhancement Act ([16 USC 6810](#)). Fee-handling volunteers must be bonded, have an appropriate background investigation, and be adequately trained in the sale of permits and fee collection as outlined in [RM-22A: Recreation Fees and Fee Policy](#). See the [WASO VIP SharePoint](#) [internal link] for additional guidance regarding [Background Check Requirements](#) [internal link]. Appropriated funds, including volunteer funds, may be used to cover the cost of the volunteer surety bond. Volunteers under 18 years of age should not collect fees or sell permits.

Spectra of Engagement

The many different types of volunteer positions can be placed somewhere along the spectra of engagement. The spectra places volunteer positions along two axes: length of service and skill level. Length of service refers to the time spent volunteering with the park or program, from micro-volunteering (i.e., crowd-sourced citizen science, drop-in trash pickup), one-time service events that last a few minutes to a few hours, and episodic or occasional volunteering, to short-term volunteers and long-term volunteers that serve over weeks, months, or years. The spectrum of skill refers to the skill level required for the volunteer service, from hands-on volunteering (trash pickups, basic maintenance, events. etc.) to specialized skills-based volunteering (preservation carpenters, medical professionals, paleontologists, dive teams, etc.). Where a volunteer position sits on the spectra informs what sort of credentialing and support may be required for proper job training, mitigating risk, ensuring safety, and providing proper legal protection for the NPS and the volunteer.

Micro-Volunteering and Hands-on Volunteering

Micro-volunteering or drop-in volunteering differs from ongoing volunteerism as the tasks take only minutes to a few hours, and the volunteer does not make a long-term commitment. This may be done in-person or virtually. As a form of virtual volunteering, tasks may be distributed and completed online via an internet-connected device, including smartphones. The application process is typically quick, requiring less

paperwork (mainly 301b for group members), screening, or training. The volunteer service takes only minutes or a few hours to complete, and does not typically require an ongoing commitment by the volunteer. Common opportunities include crowd-sourced citizen science, drop-in trash pick-up, and one-time volunteer events.

Some volunteer projects, such as [crowdsourcing citizen science](#), may have additional regulations. For more information on citizen science volunteer projects, visit the Citizen Science page on the Common Learning Portal and the [citizen science subject site](#) on nps.gov.

Virtual Volunteering

Also called e-volunteering or online volunteering, virtual volunteering is a volunteer opportunity that does not have to be physically in a park or program to complete tasks. The volunteer may work remotely to complete tasks such as data entry, research, editing, transcribing or translating documents, special projects, and outreach. As with all volunteers, they must complete a full volunteer service agreement, have an assigned supervisor, and report their hours. Home office assessments are not necessary for virtual volunteers. As with all volunteers, the volunteer service agreement should specify any allowable reimbursements and any personal property used to perform the volunteer duties and the liability threshold for any damage or loss. Virtual volunteering is similar to telework or remote work, except that instead of employees working off-site who are paid, these are volunteers serving off-site who are not paid.

Skills-Based Volunteering (Including Hazardous Duties)

Volunteers with specialized professional skills uphold the standards of their given profession, such as scuba divers, fire fighters, doctors, nurses, pilots, scientists, heavy equipment operators, commercial bus drivers, and individuals or groups who provide pro-bono services. These volunteers provide expertise to directly support operations or projects or strengthen infrastructure and capacity. They must complete a full volunteer service agreement, have an assigned supervisor, and report their hours.

See [more information about skills-based volunteering](#).

The NPS can engage volunteers to perform hazardous duties if they have the required credentials and certifications needed to perform the work (as defined in the appropriate NPS operating manuals or policies for those disciplines). The authority to allow these volunteers to perform hazardous duties is part of the delegation of general management authority to the agency.

Prohibited Volunteer Activities

Volunteers, although not beholden to the same requirements of government employees, are still representatives of the NPS. They are, therefore, specifically prohibited from the following activities while acting in an official capacity providing volunteer service or wearing a volunteer uniform (not including meal breaks out of public view, in some cases):

- Consuming alcoholic beverages, gambling in any form, or sleeping
- Smoking or carrying cigars, pipes, cigarettes, or E-cigarettes in their mouths or chewing tobacco while in the public view (see [Director’s Order #50D: Smoking Policy](#) and [Policy Memorandum 15-03: Use of Electronic Nicotine Delivery Systems](#))
- Engaging in partisan political activity (even though the Hatch Act does not apply to volunteers)
- Promoting any private business or religious faith or doctrine
- Engaging in any activity prohibited by law or NPS regulations
- Soliciting funds and fundraising (follow the same standards as for NPS staff as found in [Reference Manual 21, Chapter 3](#))

Interviews and Reference Checks

Interviews and reference checks are not required for volunteers, but are strongly recommended, particularly for volunteer positions working with the public (especially volunteers working with minors and vulnerable populations) —and for volunteers with duties requiring access to controlled environments, such as buildings and computers. This also applies to former NPS employees seeking volunteer positions.

Interviews can identify the individual’s skills, interests, and limitations. Interviews also offer the opportunity to provide information on training, orientation, equipment, liability protection, injury compensation, uniform or special clothing requirements, and other benefits or requirements relating to the volunteer service. Discussing relevant workplace policies during the interview, such as anti-harassment, is highly recommended.

Interviews are not necessary for volunteers taking part in group or special event activities. However, it is still necessary to determine whether a group will have the knowledge, skills, and abilities to complete the tasks assigned to them. Volunteer managers may interview a group leader to determine whether they will be an effective leader and whether their group is a good match for the project.

Parks and programs may use their discretion and not conduct a reference check when they believe the risk to the park or program, other members of the public, or employees is low. Examples of low-risk positions may include those not requiring controlled access to systems or facilities, any specialized skills, or access to minor or vulnerable populations.

While volunteers are not federal employees, the Office of Personnel Management’s [Reference Checking 101](#) provides helpful guidance on this topic. In

addition to these questions, all reference checks should ask the following question: “Are you aware of any misconduct that may interfere with the applicant’s ability to perform this volunteer position?”

Background Investigations

Volunteers must meet the same background investigation [requirements for Homeland Security Presidential Directive 12](#) (HSPD-12) as NPS employees, based on their service description (see [guidance on NPS volunteer background investigation requirements](#) [internal link]).

HSPD-12 deals strictly with physical and logical (computer systems) access. All other circumstances, including working with children, fee collection, etc., are covered under other existing policies. For fee collection, see [Director’s Order #22: Recreation Fees](#) (DO-22).

Superintendents/Managers have the authority to require a minimum of a Special Agency Check (SAC) to mitigate risk for volunteer positions that do not need an HSPD-12–compliant ID. The SAC consists of a Federal Bureau of Investigation (FBI) fingerprint and name check.

Additional information to help determine who may be subject to these requirements is available at [Background Check Requirements](#) [internal link] or from each region’s HSPD-12 coordinator.

Reference Manual 7 - Chapter 5: Onboarding and Management

Formalizing the NPS/Volunteer Relationship: Volunteer Service Agreements

When a park or program identifies a need or opportunity well-suited for volunteers and reaches an agreement on the work a volunteer will perform, time commitments, official starting date, and other negotiable items, they must create a volunteer service agreement. The volunteer service agreement is a contract between the NPS and the volunteer. It identifies rights and responsibilities, time frames and commitments, and all requirements. It should also be used to spell out the conditions for reimbursement of expenses if reimbursement is to be provided. This agreement is the park or program's opportunity to define the expectations and parameters for service. It's also an opportunity for the prospective volunteer to ensure they understand the role and requirements and confirm their willingness to serve in that capacity. A properly executed volunteer service agreement is a key tool of successful volunteer program management.

Volunteers may not serve without a signed and current volunteer service agreement. Volunteer Service Agreements must be renewed annually.

Contents of a Volunteer Service Agreement

The volunteer service agreement is comprised of:

- Individuals: A completed OF301a, a service description, and a job hazard analysis
- Groups: A completed OF301a (leader), OF301b (group members), a service description, and a job hazard analysis

There are no alternative formats for the volunteer service agreement. The volunteer service agreement requires a signed OF301a document (and OF301b if necessary). If this written contract does not exist, the formal agreement is not legally enforceable.

Every volunteer service agreement must include a detailed service description, either on the OF301a/OF301b form or attached, that clearly specifies and describes the volunteer duties. A complete service description must contain the following information:

- Volunteer position title

- Supervisor
- Work location
- Time commitment
- Major duties of the volunteer position
- Job hazard analysis or job safety analysis (JHA or JSA) and safety protocols, including driving if required
- Health and physical condition requirements for this position
- Qualifications (knowledge, skills, experience, ability)
- Required training, certifications, or licenses
- Benefits to volunteer, including housing if available
- Whether personal property is required (list items)
- Whether reimbursements are authorized, for what, and up to what amount (see **Reimbursing Volunteer Expenses**)

Executing a Volunteer Service Agreement

The OF301a must be signed by the volunteer or volunteer group leader and an official government representative, preferably the park or program volunteer manager, although a volunteer supervisor or other NPS employee with delegated responsibility is also acceptable. Although volunteer supervision and management may be delegated to a partner through a formal agreement, the partner may never be granted the authority to sign volunteer service agreements.

A copy of the signed agreement—along with any revisions, attachments, or amendments—should be presented to the volunteer for their own records before work is begun.

All recurring volunteers are required to review and sign an updated volunteer service agreement annually. This provides an opportunity for volunteer supervisors to check in with volunteers and discuss their position and performance at least once a year.

After the volunteer service agreement is signed, parks and programs may require the volunteer's signature on additional written documentation or forms that pertain to their assignment. This may include forms for background checks, PIV issuance, vehicle usage, credentialing, training certifications, etc.

Volunteers under the age of 18

- All volunteers under the age of eighteen must use the OF301a form and have the signature of a parent or legal guardian on the OF301a. Other parental approval forms (school, youth group, etc.) are not acceptable as replacements for the signed OF301a.
- Volunteers under age 18 may not use the OF301b.

Chart: Usage of Volunteer Forms

Short Term/Episodic Volunteering

Long Term Volunteering

- OF301a will be used for individual volunteers
 - OF301a will be cosigned by parents for volunteers under 18.
 - OF301b will be used for groups (OF301a filled out by group leader).
- OF301a will be used for individual volunteers
 - OF301a will be cosigned by parents for volunteers under 18.
 - OF301b will be used for groups (OF301a filled out by group leader).

Forms

Several forms are required for record keeping and reporting in the NPS VIP Program. Sample forms and instructions for completion are available through the [NPS VIP InsideNPS page](#) [internal link].

All NPS forms for public use, including all volunteer forms, must be official forms approved by the Office of Management and Budget (OMB). These forms may not be altered; however, the forms may be “marked up” to aid in completion (for example, relevant sections for youth may be highlighted in color). No other forms may be substituted.

Volunteer Application (OF301)

In keeping with the Paperwork Reduction Act, the NPS uses an interagency application for federal land management agencies. The “Volunteer Service Application: Natural & Cultural Resources” form (OF 301) is the only OMB-approved application for NPS volunteer applicants; it is optional to solicit general interest from the public. NPS staff may use this document as a volunteer application. NPS staff may not request potential volunteers complete a park- or program-specific or any other type of application. However, once an application has been received, a supervisor may request supplemental materials, such as a detailed resume and/or references, as part of the screening and onboarding process. These supplemental materials are also optional. Applications may be completed online at volunteer.gov, but can also be submitted or mailed directly to the park or program.

Volunteer Service Agreement (OF 301a)

Individual volunteers, volunteer groups, and parental approval are combined on the interagency Volunteer Service Agreement: Natural & Cultural Resource form (OF301a). Every completed OF301a must include an accurate and detailed service description, either on the form or as an attachment (see **Contents of a Volunteer Service Agreement**). The volunteer service agreement legally enrolls an individual or group in the NPS VIP Program and provides them with federal protection in case of tort or worker’s compensation claim. The original signed volunteer service agreement must be reviewed, revised as needed, and renewed annually and retained in a park or program

file for at least three years from the last date on which the volunteer worked. The forms contain personally identifiable information (PII) and should be secured according to federal guidelines.

Termination Section of Volunteer Service Agreement

Terminating the agreement ends the relationship between the volunteer and the NPS. The termination section on the second page of the agreement provides a means of ending an agreement when appropriate or necessary and provides a legal record of when an agreement was terminated in case of a lawsuit or injury claim.

Terminated volunteer service agreements must be retained for at least three years from the last date on which the volunteer worked. The forms must be secured as PII.

Volunteer Sign-up Form for Groups (OF301b)

An OF301b form may be completed for group volunteer projects in lieu of having each individual complete the OF301a. When using the OF301b to enroll a group, an OF301a completed by the group leader and any attached service descriptions must be included with and presented to participants filling out the OF301b. The OF301b form is the only acceptable form to accompany an OF301a for volunteers in a group. An OF301b form must be accompanied by a fully signed OF301a form, which must be filled out and signed by the group leader and co-signed by the agency volunteer program manager. Volunteers under 18 may not use the OF301b form (see **Executing a Volunteer Service Agreement**).

It is the responsibility of the volunteer manager or the volunteer supervisor to ensure volunteers signing up on the OF301b must be presented with a description of the volunteer service to be performed, including health and physical condition requirements or training/license/ certification requirements, and safety protocols.

While often used for one-day or short-term volunteer projects, the OF301b may also be used for volunteer groups which will volunteer together consistently on the same project (for example, a monthly trail crew whose group leader, group members, and service activities will remain the same). In this case, the volunteer program (1) must ensure any new members who join throughout the year also sign a volunteer service agreement (either an OF301a form or a new OF301b form with their group leader) and (2) that the volunteer program time keeping system accurately captures the dates and hours of service for specific group members.

Claim for Reimbursement for Volunteer Expenses (SF-1164)

Volunteers use the SF-1164 form to record incidental expenses and must submit the form, with receipts, as a claim for reimbursement. This form should not be used for reimbursing expenses incurred on invitational travel authorizations; use the current federal travel system (e.g., Concur Travel) instead (see **Reimbursing Volunteer Expenses** for more information).

Volunteer Orientation and Training

(see DO-7, § 14)

Each volunteer will receive appropriate orientation and job training, to be defined and coordinated by the volunteer program manager and volunteer supervisor. Volunteers should be provided with all the tools necessary to perform the job duties outlined in the service description, including EEO and anti-harassment policy training, park-specific or program-specific safety rules and procedures, and any personal protective equipment and training required by the NPS and Occupational Safety and Health Administration (OSHA) regulations. OSHA requires volunteers to take the same safety training that paid NPS employees would be required to take for a similar type of position.

The volunteer supervisor should ensure every volunteer receives job-specific training as needed and is responsible for monitoring that those volunteers are operating within established protocols.

Volunteer Recognition and Awards

(see DO-7, § 16)

Volunteer recognition is key to strong volunteer management and a core component of any VIP program. When volunteers feel appreciated and recognized, they are more likely to feel connected to the program and continue their involvement.

All NPS staff should recognize the critical role that volunteers play in helping us to meet our mission and should thank volunteers often, both through formal events and informal tokens of gratitude.

Use good judgment and provide proper justification to ensure an effective and successful volunteer recognition program.

Examples of volunteer recognition may include:

- An email or phone call to tell the volunteer that others have spoken highly of them
- Highlighting a volunteer in your newsletter or your social media
- An annual or regular event to thank volunteers

- Nominating the volunteer for an award. The George and Helen Hartzog Awards for Outstanding Volunteer Service are the official NPS awards for volunteers, though other volunteer award programs exist
- Providing an America the Beautiful Pass for volunteers with 250 cumulative service hours
- Providing a token pin or certificate to honor the number of years/hours served

The 1992 Departmental Appropriations Bill ([PL 102-154](#), Section 115) provides permanent authority to use appropriated volunteer funds to buy non-monetary gifts and awards of nominal value for volunteers as tokens of appreciation. In a memo dated February 3, 1993, and updated by the 2009 memo IRS Audit and Volunteer in Parks Reimbursement Update, the NPS Associate Director for Budget and Administration clarified the definition of the word “nominal.” In most cases, non-monetary awards should be worth no more than \$50. Monetary awards may not be given. Gift cards are considered monetary awards and may not be issued. Special circumstances may warrant gifts that are worth more than \$50, at the discretion of the Superintendent/Manager.

Volunteers are not eligible for federal employee awards programs, such as STAR awards.

The George and Helen Hartzog Awards for Outstanding Volunteer Service are the official NPS awards for volunteers (see the [WASO VIP SharePoint](#) page for additional information and resources for volunteer recognition).

America the Beautiful Pass

As of January 1, 2007, a volunteer’s time can be counted toward a Volunteer Pass, which provides free entrance into federal fee areas for one year. Once a volunteer accumulates 250 hours with selected federal agencies, they may be awarded this annual pass at no cost to the park or program.

The 250 hours may be accumulated over multiple positions or over multiple years. Volunteers are responsible for tracking their own hours and should submit a request to the volunteer manager when they have accumulated sufficient hours. Contact park or program fee managers or Regional VIP Managers for information about obtaining passes for qualifying volunteers.

See [Interagency Volunteer Pass FAQs](#) for more information.

Reference Manual 7 - Chapter 6: Administrative Requirements

Volunteer Liability

The **Volunteer Protection Act of 1997** (PL 105-19) defines volunteer work and liability. The goal is to promote volunteerism by limiting or eliminating a volunteer's risk of tort liability when acting for a government entity.

Volunteers operating under a signed and current volunteer service agreement are covered for liability through the NPS. Parks and programs must establish specific local-level liability policy and limits for all volunteer service agreements. This is especially important when engaging with the following categories of volunteers:

- Medical professionals
- Virtual volunteers
- Volunteers using their personal property (including living, such as a pet, or non-living, such as a personal vehicle)
- Artists and artisans (with regards to ownership of developed art and products)

The specific threshold should be documented in the volunteer service agreement.

Volunteers are considered "employee equivalent" for those legal purposes outlined in volunteer service agreements. Like employees, liability (within established limits of a park or program's threshold) is covered while performing official duties; it is not restricted to park boundaries or NPS facilities. An explanation of these official duties as well as duty station location should be included in the volunteer service agreement. The NPS is self-insured, which means that the NPS assumes financial responsibility in case of an incident. For volunteers who are medical professionals, any claim of malpractice while performing official duties is also covered.

Like NPS employees, coverage is extended to "off the clock" time while the volunteer is on travel status. Some volunteers perform their service outside park physical boundaries and may be asked to stay overnight as part of their official duties, such as Trails and Rails (on Amtrak routes), National River and Trail systems, virtual volunteers, volunteers attending conferences, etc. As long as the volunteer's work and duty station are specified in the volunteer service agreement, liability is extended to them in cases of workers' compensation and tort claims (within established thresholds).

Any group or individual receiving compensation from the NPS for their services (e.g., through a task agreement) is not a volunteer and is not provided liability coverage through the NPS. These participants must be covered for liability on their own or through their organization, not the NPS, as stipulated in the legal agreement between

the NPS and the organization. For example, these individuals should be traveling under their task agreement or agreement instrument, signing up for vehicle use with the partner, and not receiving volunteer program benefits. Individuals who are not performing work and are not under the direction of the NPS should not sign an OF 301a solely for the benefit of the individual “to get liability coverage.”

Individuals who are not performing work and are not under the direction of the NPS should not sign an OF 301a solely for the benefit of the individual “to get liability coverage.” Individuals must never be signed up for the sole purpose of being permitted to use government equipment under NPS liability, such as driving or riding in government vehicles or borrowing landscape or recreational equipment.

Volunteers and Federal Ethics Rules (Hatch Act)

While volunteers are not held to the same ethics laws and regulations that apply to federal employees (including the Hatch Act), they are expected to maintain the professional and ethical standards of the workplace while acting in an official capacity or wearing a volunteer uniform (see **Prohibited Volunteer Activities**). Volunteers are also expected to comply with all standards of professional conduct that apply to the work the volunteer performs under a volunteer service agreement.

Federal employees who volunteer remain subject to federal standards of ethical conduct, such as Hatch Act and conflict of interest.

Volunteers and the Fair Labor Standards Act

According to the Department of Labor (DOL), the Fair Labor Standards Act (FLSA) recognizes the generosity and public benefits of volunteering and allows individuals to freely volunteer for charitable and public purposes. A volunteer will not be considered an employee for FLSA purposes if the individual volunteers freely for public service and without contemplation or receipt of compensation.

Although the FLSA does not directly apply to volunteer activities, the child labor provisions under FLSA are designed to protect the educational opportunities of youth and prohibit their employment in jobs that are detrimental to their health, safety, and well-being.

See Department of Labor’s [Child Labor provisions](#) for more information.

See [DOL Fact Sheet #14A](#): Non-Profit Organizations and the Fair Labor Standards Act for more information.

For NPS employees, see [NPS Employees as Volunteers](#).

Use of Government and Personal Equipment

The NPS should provide the government-owned equipment required to successfully complete the duties of a volunteer position.

If the NPS requires a volunteer to use their living or non-living personal equipment to perform their duties, then use of the property must be “incident to the employee's service, and possession of the property must be reasonable, useful, or appropriate under the circumstances” (see [451 DM 3](#)). The volunteer service agreement must specifically identify the personal property involved and state that the volunteer is required to provide and use this equipment as part of their official duties.

Personal equipment may be recoverable if lost or damaged during use. Parks and programs are encouraged to establish a waiver of claim threshold that establishes a limit on the size of reimbursement claims that will be received. This must be discussed verbally with volunteers and included in their service description.

The DOI Departmental Manual sets out certain categories of items that are not recoverable, including clothing, motor vehicles used for commuting to and from volunteer service, small items of substantial value lost during transport, and items “mysteriously vanished.”

If a volunteer opts to use their personal equipment in lieu of available government-provided equipment and that property is lost, damaged, or destroyed during service, the NPS is not liable for the cost of that property, and the volunteer may not be reimbursed for the loss. A statement to this effect must be included in the volunteer service agreement and must specifically state the volunteer is not required to provide and use personal equipment as part of their official duties and will not be covered.

Federal Employee Status for Volunteers ([16 USC 558 \(c\)](#)) provides the authority for reimbursement for personal property that was lost, damaged, or destroyed while being used for official purposes for the NPS. For guidance on reimbursing recoverable property losses to a volunteer, consult with the park or program administrative officer.

Government Vehicles

Following **Director's Order #44: Personal Property Management** (DO-44), volunteers may operate government-owned vehicles for official purposes. The volunteer must:

- Possess a valid state driver's license or international driver's document for the class of vehicle being operated,
- Be at least 18 years of age, and
- Have a safe driving record (see **RM-50B, Section 6: Motor Vehicle Safety**).

The operation of the vehicle must be required in writing as part of the volunteer service agreement (both checked on the OF301a and included in the service description). Volunteers required to use government vehicles should receive training in safe, ethical, and appropriate use. For additional guidance, consult with the fleet manager or similar for the park or program.

If international volunteers are required to operate government vehicles for official purposes, the park or program must contact the Department of Motor Vehicle Administration for the state(s) in which the volunteer will operate the vehicle to determine what is recognized as a valid operator's license.

Director's Order #44: "Personal Property Management (DO-44)" prohibits the use of a government vehicle for personal use. Prohibited personal use includes the use of a government vehicle to secure groceries when a volunteer is in a remote duty station with no personal vehicle. Individuals must never be signed up as volunteers for the sole purpose of riding in a government vehicle.

DO-44 contains additional guidelines related to the appropriate use of government vehicles.

Vehicle Use and Liability

No additional credentials beyond a valid driver's license are necessary to operate passenger vehicles that accommodate fewer than 15 passengers. To operate any other government vehicle, the volunteer must show credentials verifying their qualifications and demonstrate proficiency in the operation of the vehicle. The operation of such a vehicle must be in the service description.

If a volunteer causes damage to a government vehicle through an act that is determined by the park's or program's review board to be simple negligence, the liability normally incurred by a government employee (including the requirement to pay a deductible) is not applicable. Volunteers are considered federal employees only for the purposes of liability, tort claims, and workers' compensation. and will not be required to pay for damage to a government vehicle resulting from an act determined to be simple negligence.

Benefits and Protection

(see DO-7, § 8)

Volunteers are members of the public. However, they are considered federal employees (or employee-equivalent) for the purposes of liability, tort claims, and workers' compensation. Some external volunteer organizations provide their own liability and tort claim coverage in which federal coverage becomes secondary. In the event of multiple and/or overlapping coverage, the order for claiming benefits should be addressed in local policy and the formal agreement established between the NPS and the external organization.

The acts that established volunteer benefits and protection are described below. The **Volunteer Protection Act of 1997** (PL 105-19) provides protections to volunteers, nonprofit organizations, and governmental entities in lawsuits based on the activities of volunteers.

Federal Employees' Compensation Act

Volunteer injuries, near-misses, exposures, and deaths must be reported in the Safety Management Information System (SMIS) by their supervisor just as they would be for an NPS employee. However, a volunteer is not required to submit a workers' compensation claim to the Office of Workers' Compensation Programs (OWCP) if they would prefer to handle the injury through their private insurance. If they do opt to submit the claim, the VIP would go through the Employees' Compensation Operations & Management Portal (ECOMP), and it will be handled by OWCP. OWCP may reject claims made by volunteers who were working outside the scope of their assigned duties (as outlined in their current volunteer service agreement) at the time of the accident.

See **5 USC 8101(1) (B)** and **54 USC 102301**.

Federal Tort Claims Act

Under the Federal Tort Claims Act (FTCA), the United States is liable "for injury or loss of property, or personal injury or death caused by the negligent or wrongful act or omission of any employee of the Government while acting within the scope of his office or employment, under circumstances where the United States, if a private person, would be liable to the claimant in accordance with the law of the place where the act or omission occurred" (**28 USC 1346(b)**). This act only allows compensatory damages (for damages sustained, including pain and suffering) and not punitive damages (or damages intended to punish the defendant). Because volunteers are considered employees for the purpose of this act, they are offered the protection of the act for personal liability, as long as they are within the scope of their assigned responsibilities in their current volunteer service agreement.

See **28 USC 2671–2680** and **54 USC 102301**.

FTCA and Medical Professionals

The protection afforded by the FTCA includes a claim for negligence for volunteers performing medical services within their scope of duties. The volunteer would have personal immunity for allegations of negligence and wrongful acts, and the claims would have to proceed against the US Government.

The FTCA is different from malpractice insurance. In the event a claim is raised against a medical professional, the FTCA would cover the individual. They would not need to rely on their personal malpractice insurance. FTCA coverage (and the fact that they are personally immune from suit) should be explained to volunteers for allegations arising from activities within the scope of their volunteer service agreements.

Military Personnel and Civilian Employee Claims Act of 1964

The Military Personnel and Civilian Employee Claims Act (MPCECA, [31 USC 3721](#)) allows federal employees to recover for damage or loss of personal property incident to service. Under the Volunteers in the Parks Act, volunteers qualify for this purpose (see [54 USC 102301](#) and [DO-7](#), Section 8.1). The claim may be allowed only if it is substantiated, the agency determines that possession of the property was reasonable or useful under the circumstances, and no part of the loss was caused by the claimant's own negligence. There is a two-year statute of limitations. Volunteers may not claim items lost in quarters (at home) unless those quarters are assigned or provided in kind by the US Government. DOI policies cap the amount of the loss that can be compensated at \$15,000 ([451 DM 3](#)).

The act covers volunteers' living or non-living personal property (including virtual volunteers' property) if the equipment was pre-approved for use and documented in the volunteer service agreement.

Safety/Risk Management

The safety and health of volunteers is always of utmost priority. Volunteers must observe the same safety regulations, policies and procedures and use the same safety equipment and personal protective equipment as paid employees. Failure by the volunteer supervisor to provide adequate supervision or appropriate safety training and personal protective equipment not only violates federal mandates but also increases the risk to the volunteer. It also may increase NPS exposure to potential violation notices of OSHA regulations, violate existing labor-management agreements, escalate the number of worker's compensation claims, and heighten the potential of tort liability for supervisors' acts of omission.

Volunteers must not perform work for which they are not qualified or have not been adequately trained, work that they do not feel comfortable doing or do not willingly agree to do, or work that is not part of the service description.

Job Hazard/Job Safety Analysis

The volunteer supervisor must use a job hazard analysis or job safety analysis (JHA or JSA) for all volunteer work assignments to determine the level of risk and appropriate mitigation; this is called the 'risk analysis' on the OF301a form (i.e., 'risk assessment attached'). The JHA or JSA form is available from the designated safety officer for the park, region or program. The volunteer supervisor is responsible for evaluating the specific job, outlining the potential hazards/injury sources and identifying actions, procedures, and safety equipment to mitigate safety risks to the volunteer. Volunteers will be provided training on the JHA/JSA (s) prior to commencing work in the park or program. When the JHA/JSA indicates the need for specialized operational and/or safety training, the volunteer will not be allowed to perform the job until all training is completed, the supervisor understands the volunteer's work capability, and the volunteer understands the job and its hazards.

Training Requirements

Volunteers assigned to operate machinery or equipment where training standards or certification exists (such as chainsaws and specialized equipment or vehicles) must provide proof of training or certification and demonstrate proficiency to the responsible supervisor prior to operating any machinery or equipment. All applicable state and federal age restrictions relating to the operation of machinery or equipment must be enforced.

Personal Protective Equipment

Certain volunteer positions might require volunteers to wear specific items of personal protective equipment. Required personal protective equipment should be listed in the service description.

Typically, personal protective equipment should be purchased directly by the volunteer program, although in some cases volunteers may be reimbursed for the cost. If placed in a work environment with occupational hazards in which personal protective equipment is required by OSHA standards, it must be provided at no cost to the volunteer. Volunteers must also complete any relevant OSHA-required training, and receive medical evaluations and medical surveillance as required, prior to performing work that requires the use of personal protective equipment.

Safety and Hazardous Duties

Volunteers may assist with certain limited law enforcement and visitor protection functions but must not be assigned duties that would place them in life-threatening situations, even as observers. Volunteers may not supervise but can participate in historic weapons firing demonstrations if they have received proper training ([see Director's Order #6 section on "Historic Weapons"](#)). See **Volunteer Activities** for more information.

Any use of volunteers in jobs considered to be hazardous for federal pay purposes must be evaluated on a case-by-case basis and approved by the Superintendent/Manager. Volunteer supervisors must use a JHA or JSA for all volunteer work assignments and consult with their safety officer if they question the appropriateness of a volunteer assignment for a specific duty.

Safeguarding Children, Youth, and Families

While engaging children, youth, and family volunteers, additional risk management procedures should be incorporated into the volunteer program or project activity and may include the following:

- Conducting a safety risk assessment and obtaining concurrence from the park or program safety officer
- Requiring that each child volunteer be closely supervised at all times to ensure the child is safe and that activities are performed in designated safe areas away from any potential hazards at all times
- Establishing ratios for supervision depending on the age and activity
- Providing adequate training for each child volunteer

Although federal youth employment provisions are not applicable to volunteers, volunteer managers should always check with state and local authorities concerning any safety and health protections applicable to youth. In addition, parks and programs are encouraged to consult with their regional youth program manager (if available) and to keep informed of appropriate state child labor regulations.

Although federal youth employment provisions are not applicable to volunteers, volunteer managers should always check with state and local authorities concerning any safety and health protections applicable to youth. In addition, parks and programs are encouraged to consult with their regional youth program manager and to keep informed of appropriate state child labor regulations.

Equal Employment Opportunity

(see *DO-7*, § 9)

Federal Equal Employment Opportunity (EEO) laws prohibit employment discrimination on the following bases:

- Race
- Color
- Religion
- Sex (including pregnancy, gender identity, and sexual orientation)
- National origin
- Age (40 or older)
- Disability
- Genetic information

As stated by the **U.S. Equal Employment Opportunity Commission (EEOC)** "volunteers usually are not protected 'employees.'" However, as outlined by federal laws cited in DO-7, § 9, instances may occur when volunteers are treated like employees in regard to EEO matters. As such, were something to occur, your designated EEO office should be contacted to best determine what next steps are available to the volunteer.

Beyond the resources provided by the EEO, volunteers may reach out to the **Ombuds** for support determining available next steps, and visit the **NPS Employee Wellness site** [internal link] which specifies what agency support services are or are not available to volunteers.

Regardless of federal laws or agency resources, volunteers should be treated fairly and with respect. (DO-16E) states: "The National Park Service (NPS) is committed to providing a workplace free of discrimination and harassment based on race, color, religion, sex (including pregnancy and gender identity), sexual orientation, national origin, age, disability, family medical history (including genetic information), status as a parent, marital status, political affiliation, and one that is free from illegal retaliation. The NPS will not tolerate harassing conduct (of a sexual or non-sexual nature) against another NPS employee, intern, volunteer, contractor or other non-federal employee, or other member of the public. The NPS also will not tolerate reprisal or retaliation if employees report harassment or provide information related to such complaints."

The NPS cannot correct harassing conduct if a supervisor, manager, or other NPS official does not become aware of it. Any volunteer who has been subjected to harassing conduct is encouraged to inform the person(s) responsible for the conduct that it is unwelcome and offensive and request it cease. If the conduct continues, is severe, or if the volunteer is uncomfortable addressing the responsible person(s) about the conduct, the volunteer is encouraged to report the matter to:

- The supervisor of the employee engaging in the misconduct or the volunteer supervisor if the alleged harasser is a volunteer
- Any NPS supervisor or any other NPS management official
- An employee relations specialist (call the NPS human resources office)
- **DOI Office of the Inspector General**
 - To report fraud, waste, or mismanagement to DOI, use the OIG Hotline by calling 1-800-424-5081. You can also report allegations in person at **locations** across the country. **Whistleblower protection laws** exist to protect employees who fear or suffer reprisal for making a disclosure.

- Law enforcement and non-NPS civil authorities
 - If a volunteer believes they are a victim of a criminal offense, they may contact local law enforcement, which will determine whether the offense requires other civil authorities to be notified.

While it is important that volunteers know how to report harassing conduct they may witness or experience, it is also important volunteers know they must refrain from harassing, bullying, intimidating, or behaving unprofessionally against other volunteers, employees, contractors, visitors, or anyone else in the park or program environment. Volunteers who do not behave appropriately may be terminated.

See [DO-16E for more information about NPS anti-harassment policies](#).

Uniforms and Appearance

(see DO-7, § 10)

The public must easily recognize volunteers by means of a visible distinction between paid employees and volunteers. Volunteers must not wear, or attempt to duplicate, any part of the official NPS uniform.

VIP Insignia

The NPS VIP Program official insignia or logo was updated as of January 1, 2004. The new circular patch replaced the old arrowhead-shaped patch. Any remaining arrowhead-shaped volunteer patches may be kept by volunteers as mementos. They must not be worn on any current volunteer uniform or displayed in an inappropriate manner that would be considered unprofessional.

Volunteer patches, pins, and stickers are trademarked by the NPS and may not be sold. The volunteer insignia is available as either a patch (2.25-inch and 3-inch sizes) or sticker. The new digital file has two forms, with either a “flat” or a “carved” NPS Arrowhead in the center. Usage of the “carved” version is highly restricted.

Previous VIP insignia, such as the Master Ranger Corps or Volunteer Emeritus patches, should not be utilized. Newly onboarded volunteers and new volunteer uniform items (whether for new or existing volunteers) should not utilize previous VIP insignia.

Additional guidance on the VIP logo and use of the NPS Arrowhead is available:

- [WASO VIP SharePoint](#) [internal link]
- [Special Directive 93-07: Use of the NPS Arrowhead Symbol](#)
- [Requesting Permission to Use the NPS Arrowhead](#)
- Arrowhead Guidance for NPS Employees: [Seeking Permission](#) [internal link]

VIP Uniform

Each Superintendent/Manager will designate a standard volunteer uniform designed to meet particular needs and conditions. Where possible, volunteer uniforms should consist of off-the-rack, readily available items.

A volunteer uniform should include at minimum two items:

1. The VIP insignia worn on the shirt and/or hat.
 - If the full-sized, 3-inch patch is used, it must be worn on the left shoulder (the same place as the NPS uniform patch) or on the left side of the chest.
 - If the smaller, 2.25-inch VIP patch is used, it is to be worn on the front of a cap or hat.
 - Embroidered emblems that are the same as the patch are also acceptable.
 - Alternatively, the VIP sticker can be displayed on the front of a hard hat.
2. The volunteer's name displayed on the shirt, in the form of one of the following items:
 - A VIP name bar, with an optional hour/year recognition attachment
 - A VIP cloth patch
 - A local name bar or name tag developed by the park or program, if desired

A small, circular enameled lapel pin in the form of the VIP insignia is also available. It can be worn as part of the uniform or given to the volunteer as a token of appreciation.

Uniform Wear Standards

The VIP uniform should only be worn while providing assigned volunteer service. The same list of activities prohibited for NPS staff while in uniform applies to volunteers while in uniform (see **Prohibited Volunteer Activities**).

All VIP uniforms and uniform components must meet the following minimum standards:

- They must be clean, neat, and free of offensive odor at the beginning of the workday.
- They must not be faded or frayed and must be free of excessive wear, including worn areas, shiny spots, pilling, holes, or missing buttons.
- All items should be ordered (or altered to) sizes that prevent excessive tightness or bagginess.

Additional standards may be defined when [establishing local policy](#).

Regular Personal Clothing

Volunteers who are in public contact positions should be in the volunteer uniform rather than personal clothes. However, at the discretion of the Superintendent/Manager, some volunteers may not be required to wear an official uniform. Regular personal clothing worn during volunteer service should be neat, clean, in good taste, and appropriate to the type of work being done. Non-uniformed volunteers should be identified as

volunteers in some other way, such as with a sign at a group work site or with reusable safety vests with a VIP logo.

Reproduction Period Clothing

Reproduction period clothing that complies with historic dress standards of the NPS area may be worn. If the identification tag or name bar is not worn, some other method should be employed to let the public know that volunteers are involved in that activity.

Source of Supplies

Volunteer program supplies, including patches, lapel pins, and stickers, are available online. Some regions may also choose to make bulk purchases available; check with your Regional VIP Manager.

Volunteer name bars and volunteer hours/years recognition attachments, as well as cloth patches for shirts, are available through the NPS uniform contractor. When ordering the volunteer name bar, specify the volunteer's name as it should appear. When ordering the volunteer hours/years name bar attachment, specify the number of hours/years as they should appear. The attachment is applied to the back of the name bar and is removable for subsequent attachments.

Hard hats, caps/hats, and other volunteer uniform items may be ordered by parks and programs using appropriate vendors and government procurement procedures. NPS staff should purchase required items and provide them to the volunteer. Contact Regional VIP Managers for uniform vendors.

Housing

(see DO-7, § 11)

A park Superintendent/Manager has the authority to prioritize and designate government housing for volunteers. According to Reference Manual #36: "Housing Management (RM-36)," Section 3.3.2.1, each volunteer should work a minimum of 30 hours per week in return for housing or trailer pads, although a Superintendent/Manager may require a higher minimum. The NPS may not require volunteers to pay rent for government housing.

The Superintendent/Manager may determine which park office or benefiting account will pay for quarters operations and maintenance, including utilities, to substitute for rent not received while units are being used by volunteers. Excessive cleaning and damage will be billed directly to the volunteer with a bill of collection. If the volunteer is noncompliant, the benefiting account is expected to pay for any excessive cleaning or damages to the

unit (see RM-36). If NPS-owned housing is not available, the park may pay for volunteers to live outside the park; the volunteer must pay the rent and be reimbursed.

See **Reimbursing Volunteers: Travel Status** for additional information about reimbursing volunteers for housing.

Rent should not be reimbursed for volunteers who are staying in the residence in which they lived before becoming volunteers.

Check with your housing office to determine if volunteers under the age of 18 are authorized to live in government housing unaccompanied.

Park Closures

When anticipating any closure, parks and programs should include volunteers as part of their contingency planning and communication. This includes park closures for natural disasters, severe weather, pandemic conditions, or a government lapse in appropriations.

In the event of a closure, the NPS may close most operations. During a government lapse in appropriations, NPS will close all operations, except for those activities expressly authorized.

During any closure:

- If NPS staff are still working:
 - Volunteers are able to serve, but are not allowed to serve without supervision and when the normal protections such as liability coverages are suspended (see **Antideficiency Act**).
- If NPS staff are not still working:
 - Volunteers will follow the same schedule as furloughed NPS employees and must follow the same restrictions as NPS employees. This includes not accessing closed federal buildings and not using any federal equipment or property, such as vehicles, computers, mobile phones, maintenance equipment, or educational props.
 - Individuals or groups wishing to volunteer for partner organizations who are active during a closure in which NPS staff are not working must enroll separately as a volunteer(s) for that partner and may then be covered by the insurance and human resource policies of that partner, if any. In the case of an NPS volunteer enlisting to serve with a partner, the volunteer must wear whatever uniform is prescribed by the partner and may not wear the NPS volunteer uniform in performance of these duties unless expressly authorized.
 - Volunteers may continue to stay in NPS housing and campgrounds at the discretion of the park Superintendent/Manager.

Reference Manual 7 - Chapter 7: Reimbursement

(see DO-7, § 7)

Reimbursement Policy

The NPS has the authority to reimburse volunteers for actual out-of-pocket expenses incurred as a result of VIP activities. Out-of-pocket expenses may include:

- Transportation
- Uniforms
- Lodging
- Subsistence (food, water, laundry, etc., as designated in policy)
- Incidental expenses

Wages, stipends, honorariums, and/or living allowances are not considered eligible reimbursement costs. Per the “Fair Labor Standards Act” and IRS guidance, parks and programs cannot give volunteers a “flat rate” daily, weekly, or monthly reimbursement, stipend, or per diem.

It is important to note that reimbursement is not mandatory. The NPS is not obligated to provide any reimbursement to volunteers for any purpose. Reimbursements are meant to offset the personal cost of volunteering. They are not constrained to the physical park boundaries as long as the volunteer is performing the duties in the volunteer service agreement.

All reimbursements must be made in accordance with current IRS guidelines.

Food

Food reimbursement can include volunteer expenses incurred while purchasing food from a restaurant or similar type food vendor and the customary tip for the location (not to exceed 20 percent). Reimbursement of food purchased at grocery or similar type stores is allowable; however, reimbursement must be limited to expenses that are reasonably necessary while the employee is on volunteer assignment (e.g., the volunteer cannot be reimbursed for the equivalent of one month of food when he/she is only serving as a volunteer for one week). The reimbursement of alcohol, tobacco, or similar products is prohibited.

Volunteers may only receive per diem meal reimbursement through invitational travel (see **Claiming Reimbursement**).

Other Incidental Expenses

Volunteers may receive reimbursement for incidental expenses directly related to the operation of the volunteer program, such as medical exams (when required for specific positions), fingerprints, volunteer training tuition and materials, uniforms and costumes, special tools, and equipment. Whenever possible, supplies and materials for volunteers should be purchased with an NPS purchase card, instead of volunteers making supply purchases with their own funds or credit cards.

Establish Park/Program Reimbursement Policy

Superintendent/Manager have the discretion to determine which reimbursements will be authorized and may set a limit or not-to-exceed amount on what volunteers may claim. Each park and program, therefore, should create a local reimbursement policy and include it in the volunteer service agreement. Reimbursement rates must be at or below the local per diem rate.

Per the Fair Labor Standards Act and IRS guidance, parks and programs cannot give volunteers a “flat rate” daily, weekly, or monthly reimbursement, stipend, or per diem. For example, the NPS cannot give the volunteer \$20 a day for lunch with the expectation or assumption that they will or did spend \$20. However, the NPS can reimburse a volunteer \$20 (the local limit) for a \$25 lunch expense incurred while volunteering if they have a receipt.

Claiming Reimbursement

There are two methods for reimbursing volunteers:

1. Invitational travel, through Federal Travel Regulations ([FTR, 41 CFR 300–304](#))
2. SF-1164, through 54 USC 102301(b)

Each method has different requirements, processes, and documentation. The highlights of each method are summarized in the following chart, with additional explanation below. In all cases, accurate and current records of expenditures must be maintained.

Whenever possible, purchases should be made through the government procurement process rather than directly by the volunteer.

	Invitational travel, via Concur	Form SF-1164
Authorization	Federal travel reimbursement through 41 CFR 300-304	54 USC 102301(b)
Status	“Away from home”	“Away from home” or “Not away from home”
Can Be Used For	Travel only (transportation, lodging, per diem, and miscellaneous expenses)	Travel, lodging, food, PPE, training, medical exams, uniform items, etc. Follows FTR to determine what travel charges are allowable (e.g., cannot be used for alcohol or tobacco)
Park and Program Considerations	Impacts park/program travel ceiling May include processing fees Adheres to standard Federal Travel Regulations (FTR) and reimbursement limits Parks/programs must set up volunteer as a “vendor” Follows GSA rates	Expenses should be coded against the FBMS Commitment Item (BOC) 118C. Use of this BOC does not count against the travel ceiling or create a taxable event for the volunteer If used for travel, additional limitations may apply (e.g., park-set caps on the amount of food per day, out of pocket expenses, local and public transportation that can be reimbursed) Volunteers may not receive a flat-rate daily, weekly, or monthly meal reimbursement, stipend, or per diem Follows IRS / charitable rates
Volunteer Considerations	Does not create a taxable event Must provide bank information for EFT payment process Exception process for international volunteers; work with International Affairs	Receipts required to verify charges
Park Actions	Issue a TDY travel authorization	Establish local reimbursement guidance to answer “What allowable expenses will be reimbursed and up to what limit?”

Reimbursement Requirements

For the purpose of reimbursement, each volunteer service agreement should include the following information:

- Volunteer's name
- Volunteer's permanent home address, or if the volunteer's permanent home address is a mobile home, the statement "volunteer resides in a mobile home"
- Volunteer's duty station and address
- Date or dates the individual will be serving as a volunteer
- A statement indicating if the employee is authorized to be reimbursed for expenses under 54 USC 102301(b)
 - If being reimbursed under 54 USC 102301(b), a listing of what expenses may be reimbursed to the volunteer and any limitations to the volunteer's reimbursement (e.g., reimbursement limited to \$20 a day)
- The following statement: "I agree that I have not accepted, and will not accept, duplicate reimbursement for relocation expenses from public or private sources. Furthermore, to the best of my knowledge, no third party has accepted duplicate reimbursement for my relocation expenses."

Travel Status

Travel status ("away from home" versus "not away from home") determines what volunteers may be reimbursed for. In accordance with the local reimbursement policy, when the volunteer will receive reimbursement, the park or program must designate a duty station within the volunteer service agreement that will also serve as the home of record. Determination of duty station is important when determining whether a volunteer is "away from home" or "not away from home," because volunteers who are given park housing (such as dorm, yurt, camper pad, trailer, etc.) must not also be reimbursed as if they are traveling.

Away from Home

For reimbursement purposes, a volunteer is considered "away from home" when all of the following situations exist:

- The volunteer's residence while volunteering is greater than 50 miles from the duty station.
- The volunteer cannot reasonably commute to and from their residence to the duty station on a daily basis without requiring overnight travel or stopping for substantial sleep or rest.
- The volunteer's primary residence is not a recreational vehicle, travel trailer, or similar home without a permanent physical address. A permanent address must be a habitable structure, not a mailing address.

When a volunteer is considered “away from home,” the following reimbursement standards apply:

- **Mileage:** Mileage for commuting from a residence to an assigned duty station is reimbursed based on the prevailing IRS mileage rate for charitable service. Mileage for on-duty travel (when a government vehicle is not available) may be reimbursed at the charitable rate, or the volunteer may be put on invitational travel and be reimbursed at the standard federal mileage rates.
- **Other Transportation Costs:** In addition to mileage, the actual cost of tolls, ferries, public transportation services, and similar types of expenses may be reimbursed. Under the “away from home” category, volunteers can be reimbursed for their airfare costs using either of the methods shown in the chart.
- **Meals:** Volunteers who are “away from home” may be reimbursed for the actual cost of meals, up to the “meals and incidental expenses” (M&IE) portion of the federal per diem rate or specific park or program limit. In limited situations, meals may be provided for the volunteer by the government (see **NPS-Provided Food** for additional information).
- **Lodging and Related Expenses:** Volunteers “away from home” may be reimbursed for the actual cost of lodging and related expenses, up to the lodging portion of the federal per diem rate or specific park or program limit. The NPS may also provide housing directly to volunteers without billing them.

Not Away from Home

For reimbursement purposes, a volunteer is considered “not away from home” in any of the following situations:

- The volunteer’s residence while volunteering is less than 50 miles from the volunteer work site. If the volunteer has been provided housing in the park, their assigned housing becomes their residence for purposes of duty station.
- The volunteer can reasonably commute to and from their residence to the work site on a daily basis without requiring overnight travel or stopping for substantial sleep or rest.
- The volunteer’s primary residence is a recreational vehicle, travel trailer, or similar home without a permanent physical address. A permanent address must be a habitable structure, not a mailing address.

When a volunteer is considered “not away from home,” the following reimbursement standards apply:

- **Mileage:** Mileage for commuting from a residence to an assigned duty station is reimbursable based on the prevailing IRS mileage rate for charitable service, at the discretion of the Superintendent/Manager. Mileage for on-duty travel (when a government vehicle is not available) may be reimbursed at the prevailing charitable rate, or the volunteer may be put on invitational travel and be reimbursed at the prevailing GSA rate.
- **Other Transportation Costs:** In addition to mileage, the actual cost of tolls, ferries, public transportation services, and similar types of expenses may be reimbursed.
- **Meals:** Volunteers who are “not away from home” may not receive reimbursement for meals. In limited situations, meals may be provided for the volunteer by the government (see **NPS-Provided Food**).

- **Lodging and Related Expenses:** Volunteers “not away from home” may not receive reimbursement for lodging and related expenses. In some limited situations, however, lodging and related expenses may be provided by the government for volunteers who are “not away from home” (e.g., if a volunteer is in a position that requires them to be on call 24/7 or if a volunteer is performing work in the backcountry, and it is not practical for the volunteer to return home each evening).

Volunteers who fall under the “not away from home” category can be reimbursed only using SF-1164. The volunteer must provide receipts for any expenses (regardless of the amount) to receive reimbursement.

Reimbursement Process

Option 1: Invitational Travel

Only volunteers in “away from home” status may be placed on invitational travel. When a volunteer is placed on an invitational travel authorization, they are reimbursed in accordance with the DOI TDY policy. The volunteer must be given an invitational travel letter that clearly states the types of reimbursement the volunteer may receive and, if applicable, any not-to-exceed limits. The volunteer will be placed in the online government travel system (currently Concur), and travel ceilings will apply. Consult DO-31, Section 6: Travel Policies and Procedures and your travel manager for more information.

Invitational travel reimbursement will be processed via electronic fund transfer (direct deposit). If air travel is necessary, tickets must be purchased directly by the NPS. Volunteer travel more than 50 miles beyond park boundaries that will not result in reimbursement may be authorized via a paper travel authorization request form (Form GSA87).

If a park or program establishes a per diem rate lower than the local standard, the rate will need to be manually adjusted in the travel system.

Reimbursements made to volunteers under invitational travel have the same requirements for audit purposes as an employee traveling on official business under a TDY authorization.

Option 2: SF-1164 under 54 USC 102301(b)

Form SF-1164 may be used to reimburse volunteers who are “not away from home” or “away from home.” Volunteer reimbursement made using SF-1164 should be coded under the Budget Object Code (BOC) 118C, Non-Federal Employee Compensation/Awards.

To initiate reimbursement using SF-1164:

1. The volunteer provides banking information and submits a typed vendor request form to the Accounting Operations Center (AOC) (consult with budget personnel for more information).
2. The volunteer fills out the claim form with their expenses. For mileage, the volunteer must include a time sheet that shows starting and ending points for each day of travel and the total distance travelled. For other expenses, the volunteer must provide itemized receipts (including for meal reimbursement). Volunteers may not receive a flat-rate meal reimbursement amount or flat-rate daily reimbursement amount. Volunteers must include the following information and supporting documentation:
 - The statement “VIP reimbursement” on SF-1164
 - An itemized listing of expenses, the date the expense was incurred, description of the expense (e.g., mileage on January 1 from residence to volunteer site), and the amount of reimbursement requested for each expense
 - Volunteer’s signature
 - Authorized approving official’s signature
 - Receipt for each expense claimed for reimbursement
 - Copy of the volunteer service agreement
3. The volunteer signs page two of the claim.
4. The supervisor provides an account number and signs page two, approving the claim and filling in the total amount. The supervisor provides an account number. The budget person signs the “Authorizing Certifying and Paying Officer” section on the second page.
5. The vendor number is written on the first page of SF-1164.
6. Budget staff submit the claim to AOC through FBMS.

Upon completion, volunteer supervisors must ensure all documentation meets NPS audit requirements.

Group Reimbursement

Groups also may claim reimbursement using SF-1164. Each group member must complete their own SF-1164 and vendor form, or the group leader may request reimbursement on behalf of a whole group and then distribute the reimbursement funds on their own.

Individual park and program procedures may vary; consult with budget personnel for more information.

Non-US Citizen Reimbursement

If the volunteer is not a US citizen or does not have a US bank account, they may apply for an EFT (electronic funds transfer) waiver. Budget staff can provide an EFT waiver form. The reimbursement process otherwise remains the same; however, instead of a direct deposit, AOC will issue a treasury check.

Reference Manual 7 - Chapter 8: Program Audit, Monitoring, and Evaluation

Parks and programs are encouraged to conduct regular volunteer evaluations and provide feedback on their performance. Volunteers should be provided an opportunity to give feedback on their experience, as well.

Assessing and Evaluating Volunteers and Volunteer Programs Using Surveys

The Information Collection Clearance Officer (ICCO) is responsible for ensuring that all NPS information collection activities adhere to the requirements of the “Paperwork Reduction Act of 1995” (PRA), OMB directives, and other applicable legislation. The acts ensure requirements placed on the public (individuals, private sector, and state/local/tribal governments) are justified and controlled. OMB guidance defines “information” as “any statement or estimate of fact or opinion, regardless of form or format, whether in numerical, graphic, or narrative form, and whether oral or maintained on paper, electronic or other media” and include requests for information to be sent to the government, such as forms, written reports, and surveys.

Per ICCO, whether the PRA applies depends on whether the information collected is by a volunteer or from a volunteer.

- Information collected by a volunteer:
 - Whether the PRA applies to volunteers depends on the position type and what is stated in the volunteer service agreement (e.g., volunteers assisting with research and data collection, etc.). If data collection or research activities that will result in further analysis are written into the volunteer service agreement or are part of local policy, the PRA may not apply. One example would be citizen science volunteers operating under a signed and current volunteer service agreement specifying their research duties. Please contact the NPS ICCO for additional information or guidance related to the PRA.
- Information collected from a volunteer:
 - The PRA would not apply because volunteers under a signed and current volunteer service agreement may be treated as employee equivalent for purposes of information collection, a volunteer experience survey may be collected from volunteers by their park or program. The survey should be limited to the need to evaluate the volunteer program and NPS staff should

ensure that the survey will not cause undue burden to the volunteer (ex: length of survey, frequency of survey).

Program Assessments

To ensure consistent policy adherence, identify challenges and outline possible solutions, and highlight outstanding success, regional offices should monitor volunteer programs by conducting routine program assessments (also known as performance audits or program reviews) of parks and programs within their region, using nationally approved and recommended methods including internal controls reviews. The findings of this program assessment process should be shared with the park or program staff as well as the national office.

Performance and Conduct Management

When a volunteer performance or conduct problem first appears, the volunteer supervisor should immediately bring it to the attention of the volunteer and the volunteer manager and work with the volunteer to find a solution. If problem-solving measures do not improve the situation and/or the volunteer cannot be reassigned to another project or task without the problem being repeated, they may be notified that their services will no longer be needed (see **Termination of Volunteer Agreement** for more information).

Reference Manual 7 - Chapter 9: Termination of Volunteer Service

(see DO-7, § 17)

A successful volunteer program starts with a thorough and accurate volunteer service agreement, which is the foundation for the work to be performed and includes any specific requirements or conditions. The OF301a form states "...either the government or [the volunteer] may cancel this agreement at any time by notifying the other party."

When the volunteer's service ends, the supervisor should evaluate the volunteer fairly, and the volunteer should be given an opportunity to evaluate the volunteer program on the basis of their experience.

Park- or Program-Initiated Termination

Volunteers are not employees and can be terminated by the NPS at any time and for any non-discriminatory, business-based, legitimate reason. Some circumstances warrant immediate termination. The NPS is not obligated to keep a volunteer who is not performing satisfactorily or if there are unresolvable conduct issues. Whenever possible, the volunteer supervisor should work with the volunteer to correct performance and behavior before moving to terminate the volunteer. Termination of service must be noted on the volunteer service agreement.

Volunteer-Initiated Termination

Volunteers may terminate the agreement themselves at any time. Volunteers may decide to end their services for a number of reasons, such as the completion of a specific project, a conflict with personal or family obligations, or the acquisition of a new job. If the volunteer intends to use their volunteer experience as a means of qualifying for a particular job, they may request a letter from the supervisor verifying the type of work performed. Termination of service must be noted on the volunteer service agreement.

Termination Process

Officially, the only thing that needs to be done to terminate a volunteer is to have the volunteer's supervisor or another government employee sign the termination section of the volunteer agreement. Other steps may need to be taken depending on the situation. If the volunteer is being terminated for conduct or performance issues, a termination

letter should be issued explaining the reasons for termination and including a signature line for the volunteer to acknowledge receipt of the letter. The supervisor should inform their next-level supervisor as well as the Superintendent/Manager of the termination.

In cases in which the volunteer may become volatile, law enforcement staff should be informed and may be asked to escort the volunteer out of the park or off federal property. If the volunteer resides in park housing, they should be given a reasonable time period in which to leave the park, usually 24 or 48 hours. For egregious conduct (e.g., felonies), however, they may be asked to leave immediately, and law enforcement should be engaged.

A note should be placed in the volunteer's file explaining why the volunteer was terminated, and the file should be kept for at least three years.

Reference Manual 7 - Chapter 10: Reporting

(see DO-7, § 12)

Annual Reports

The NPS VIP Program requires an annual report near the end of each fiscal year. In this report, volunteer program managers report a summary of all volunteer activities, hours, accomplishments, and expenditures through a formal data call. Accurate metrics about volunteer services at NPS demonstrate accountability and value to our communities, our stakeholders, and our funding sources. The data collected by the annual VIP report demonstrates the return on investment our incredible volunteer programs generate.

Statistics

For consistency, volunteer managers across the NPS should count volunteer data using the following standards:

- A recurring individual volunteer is counted once in a fiscal year per unit.
- Countable hours (also referred to as “on duty” time) are the only hours for which the volunteer is covered under workers’ compensation/liability. These include:
 - Time performing service or attending meetings or training at the duty station
 - Time performing service or relevant training at home or off-site, as approved by the NPS
 - After arriving to their duty station, “on duty” travel time within the park or to the assigned work location
- Hours that are not counted include:
 - Commute time to and from the residence to the daily duty station
 - Travel time to and from the duty station for an extended work period (e.g., travel from the volunteer’s home in Florida to a park in New Jersey)
 - While on travel status during “off the clock” time
 - Mealtimes (30 minutes per eight-hour shift)

Record Keeping

In compliance with the Federal Records Act of 1950 (as amended under 44 U.S.C. 31, Records Management by Federal Agencies), parks and programs must maintain accurate and current volunteer program records. Volunteer program files should be established under the direction of the volunteer manager and contain all pertinent

information, such as local policy, needs assessment information, service descriptions, recruiting information and strategies, and required training materials.

Separate volunteer files should be maintained and stored for each volunteer or volunteer group in the volunteer program. The files should contain the originals or copies of all forms associated with the volunteers, including:

- OF301a, service description, and job hazard analysis or job safety analysis (JHA or JSA)
- OF301b (groups), service description, and job hazard analysis or job safety analysis (JHA or JSA)
- Form 10-67 (Claim for Reimbursement for Volunteer Expenses) if the VIP claimed reimbursement for out-of-pocket expenses; and
- Other pertinent documents, such as:
 - Background investigation,
 - Training documentation,
 - Certification and licensing documentation,
 - Time logs,
 - Evaluations,
 - Any other documents, as required.

Records in this system are subject to the Privacy Act of 1974 (5 U.S.C. 552a). The system of records notice is "INTERIOR/DOI-05, Interior Volunteer Services File System 66 FR 28536 (May 23, 2001); Modification published 86 FR 50156 (September 7, 2021)." Access to records in the system is limited to authorized personnel whose official duties require such access. Paper records must be maintained in locked metal file cabinets and/or in secured rooms.

Parks and programs should ensure there is a way for a designee to access emergency contact information for volunteers contained in the volunteer service agreement, in case the volunteer manager or supervisor is not able to do so in a timely manner. For example, a copy of emergency contacts may exist in another location accessible by others; per Records Management, this is a reference document only (i.e., a 'non-record').

The [**NPS Records Schedule, Partnerships, Item 7 \(N1-79-08-6\)**](#) states that volunteer records are temporary and should be destroyed three years after the volunteer service agreement has been terminated. This timeline allows for access to the volunteer's information if the volunteer returns to the same park again or travels to other parks and seeks references, as well as to document any liability or OWCP claims made after the position has been terminated. Inactive records may be placed in a separate repository or location, such as organized by calendar year, until the disposition date.