



Directors Order #21 *Refresher*
Donations & Fundraising

Participant Guide



National Park Service TEL Training

February 5, 2009

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Welcome

How to Interact with the Instructor

If you were physically in the classroom with the instructor, you would raise your hand to let her/him know you had a question or comment. Then you would wait for the instructor to recognize you and ask for your question. We are all familiar with that "protocol" for asking questions or making comments.

With TELNPS courses there is also a "protocol" to follow to ensure that you can easily ask questions and others can participate as well. It may seem a little strange at first asking a question of a TV monitor. Remember, it is the instructor you are interacting with and not the monitor. As you ask more questions and participate in more TELNPS courses, you will soon be focusing only on the content of your question and not the equipment you are using to ask it.

As part of the TEL station equipment at your location, there are several push-to-talk microphones. Depending on the number of students at your location, you may have one directly in front of you or you may be sharing one with other students at your table.

When you have a question, press and hold down the push-to-talk button, maintaining a distance of 12-18 inches, wait a second and then ask your question or make your comment. It would sound something like this:
Excuse me [instructor's first name], this is [your first name] at [your location]. I have a question (or I have a comment)."

Then release the push-to-talk button. This is important because until you release the button, you will not be able to hear the instructor.

The instructor will acknowledge you and then ask for your question or comment. Stating your name and location not only helps the instructor, but also helps other students who are participating at different locations to get to know their classmates.

In this specific class, you can also send any questions regarding Directors' Order #21 and general Partnership issues to the Fish & Wildlife Training Center studio at broadcast@fws.gov or fax us questions to 877-884-6282. We will try to answer these questions on-air during the broadcast.

Learning Objectives

At the end of this course, participants will be able to:

- Articulate the three main intentions of DO21 Hint: What does DO21 ensure?
- Name at least two kinds of contributions that can be accepted?
- Explain the conditions under which the Director needs to be involved with a donation.
- Name three considerations to accepting a donation
- Explain the conditions when the Regional Director needs to be involved with a Fundraising campaign.
- Describe the difference between direct donation and partner donation
- Describe at least two ways to thank or otherwise recognize donors
- Describe the processes a park would need to follow with a \$20,000 donation; a \$250,000 donation; and a \$2,000,000 donation
- Name at least two ways to find guidance when considering and accepting donations, and working with fundraising partners.

I. Background & History...

Why have a DO#21 Fundraising and Donations Class?

National Park Service Director's Orders (DO) provide park managers and staff comprehensive guidance on Service-wide policy and required or recommended practices and procedures. They cover a variety of subject areas, from the delivery of park interpretive programs to the management of natural and cultural areas. These guidelines are regularly reviewed and updated.

Private sector support for America's national parks has a tradition as old as the parks themselves. Even before the establishment of the National Park Service as a bureau of the Department of the Interior in 1916, citizens were stepping forward to protect special places that exemplify our national heritage. Today, over 150 friends groups and the National Park Foundation carry forward this tradition in our national parks.

Director's Order #21 – Donations and Fundraising was first written in 1998 to provide guidance to park managers in accepting donations and working with organizations who seek to raise money to benefit the national parks or the programs of the NPS. DO #21 helps to ensure that the growing—and welcome—support we receive from the private sector is accepted and recognized in accordance with applicable laws, regulations and policy.

There are many things we can do to encourage and support donations to and fundraising on behalf of the National Park Service including:

- ✓ Identify projects and programs appropriate for private sector support;
- ✓ Describe NPS needs or how donations will be used to potential donors and the public;
- ✓ Allow the non-intrusive display and distribution of materials in parks to educate visitors about authorized fundraising activities
- ✓ Attend events held by a fundraising partner and accompany a partner on visits to prospective donor
- ✓ Work with organizations and local businesses in co-sponsoring events

The purpose of this course is to provide participants with skills and knowledge required to understand and effectively apply DO21 and to explain the intent of the order.

II. DO#21 - Overview

- ✓ DO #21 provides guidelines for the NPS in working with friends groups and other non-profit fundraising partners
- ✓ DO #21 helps to ensure that all activities related to fundraising maintain: the *integrity* of our parks; the *impartiality* of the NPS; and *public confidence* in what we do

What is Director's Order #21?

DO#21 sets parameters for the activities of NPS employees who directly accept and/or work with organizations who seek to raise money to benefit the NPS.

Contents of DO #21

- Under what authority may we accept donations? (Section 2)
- Who may accept a donation? For what purposes? (Section 4, 6)
- Who authorizes fundraising & how? (Section 4)
- What is in-park friend-raising? (Section 6)
- When should a donation be declined? (Section 6)
- What basic ethical considerations should an employee be mindful of? (Section 3)
- Are there special considerations for corporate donations? (Section 7)
- Partnership construction? (Section 9)
- How are donors thanked and recognized? (Section 10)

What is *not* subject to DO #21?

- Services of Volunteers (1969 VIP Act)
- Challenge cost-share where there is no public fundraising
- Fee for Service
- Donations of Official Travel
- Donations associated with exercise of NPS regulatory authorities (mitigation measures)
- Gifts to individual employees
- Commercial Services

Capture your notes here



III. Authorities

- ✓ Congress has given the NPS the legal authority to accept donations
- ✓ Your individual park or program may also have specific legislation related to donations and fundraising
- ✓ There are easy to find resources available, such as the DOI Partnership Legal Primer that provide information on the legal framework for donations and fundraising

Who can support NPS through fundraising activities?

- Non-profit entities organized under state or federal law
- Businesses

Authorities

Our basic authority to accept donations comes from:

- ❑ **16 U.S.C. § 1-18f** ~ General Authority to Take Actions That Promote and Regulate Units of the National Park System (NPS Organic Act)
- ❑ **16 U.S.C. § 6** ~ Authority to Accept Donations
- ❑ **16 U.S.C. § 1g** ~ Transfer of Appropriated Funds to Carry Out NPS Programs
- ❑ **16 U.S.C. § 1a-2(g)** ~ Agreements to Allow Exhibits and Interpretive Demonstrations in Parks
- ❑ **16 U.S.C. § 1a-2(j)** ~ Agreements Concerning Cooperative Research and Training on NPS Resources
- ❑ **16 U.S.C. 18f** ~ Acceptance of Donations of Property and Money for Museum Purposes
- ❑ **16 U.S.C. 18g-j** ~ Acceptance of Volunteer Services

What kinds of contributions which may be accepted?

- Cash, securities, real property, facilities, personal property, and services.

Remember...

1. NPS employees may not solicit funds.
2. Director's Orders do not provide statutory authority to enter into partnerships.

If in doubt...

The Solicitor's Office has created a **Partnership Legal Primer** that lists many of the legal authorities currently available to support partnership activities.

www.doi.gov/partnerships/partnership_legal_framework.html

IV. Authorizing Fundraising

Authorization = NPS support of the effort and agreement to accept the funds and use them as specified.

Who can Authorize Fundraising Efforts?

Director ~ over \$1 million

- May delegate under \$5 million to RD if 100% partner funded

Regional Directors ~ up to \$1 million

- May delegate up to \$100,000 to Superintendent

Superintendent ~ under \$25,000

- No agreement required

Director is always involved when:

- \$1 million or more
- Funds solicited nationally
- National advertising/promotion
- Potential controversy

❖ **Same levels of authorization for *Corporate Campaigns*; must be reviewed and cleared by Partnership Office before authorized.**

Capture your notes here



DRAFT: Delegations Summary Chart
Fundraising Agreements

Category	Threshold	Delegation Level
Authorizing Fundraising		
Construction Project (Need to clarify how the actual construction contract/agreement would be approved)	Under \$100,000	Superintendent
	\$100,000 to \$1 million	Regional Director
	\$1 million to \$5 million	Director; Director may delegate to RD if 100% partner funded
	\$5 million and higher	Director with Congressional Concurrence
Projects and/or Programs	Under \$25,000	Superintendent; does not require written fundraising agreement
	\$25,000 to \$100,000	Regional Director; RD may delegate to Superintendent
	\$100,000 to \$1 million	Regional Director
	\$1 million to \$5 million	Director; Director may delegate to RD is 100% partner funded
	\$5 million and higher	Director
Project/Program/Construction	Involves a national solicitation, national advertising or promotion, or likelihood of significant controversy	Director

V. Accepting Direct Donations

Who can *accept* direct donations*?

Director ~ over \$1 million

Regional Directors ~ up to \$1 million

- May delegate to Superintendent

Superintendent ~ up to \$250,000

Also:

- ✓ Associate Director for Partnerships and Visitor Experience must review/clear donations over \$250,000
- ✓ Donor Certification is required for donations more than \$25,000

For what purposes?

Any activity for which appropriated funds could be used...**but**...there may be restrictions regarding:

- Use of donations from cooperating associations
- Use of donations for NPS salaries
- Use of donated funds for construction

When must a donation be declined?

- Does not meet park needs or is not sustainable
- Decision based on whether acceptance of any donation will maintain the integrity, impartiality, & public confidence in NPS/DOI
- Acceptance would associate NPS with alcohol or tobacco products
- Donations from concessioners (co-sponsorship okay)
- Assessment based on totality of circumstances.
- NPS queries offices with programmatic responsibilities in concessions, contracting, special park uses, & assessment of resource damages as well as the SOL. This process is called by many names: considering, evaluating, reviewing, or vetting. (See Section 6 on *Considering Direct Donations* for more information.)

*Donations may not be accepted without first being reviewed as described in the next section.

DRAFT: Delegations Summary Chart
Direct Donations

Category	Threshold	Delegation/Action Level
Reviewing a Direct Donation		
Donations that are not land or interests in land	Under \$25,000	Superintendent using standards in 6.1.1 and 6.1.2b
	\$25,000 to \$250,000	Superintendent using donor certification form* and standards in 6.1.1 and 6.1.2b.
	\$250,000 to \$1 million	Superintendent using donor certification form* AD-PVE through Partnership Office coordinates with NPS subject matter experts and Solicitor's Office and if necessary, OIG
	\$1 million and higher	Superintendent using donor certification form* AD-PVE through Partnership Office coordinates with NPS subject matter experts and Solicitor's Office and if necessary, OIG. AD-PVE through the Partnership Office also coordinates with other DOI Bureaus
Accepting Direct Donations		
Donation	Up to \$1 million offered <u>directly</u> to a park	Regional Director; RD may delegate to Superintendent. AD-PVE must review and clear donations over \$250,000.
	\$1 million and higher offered <u>directly</u> to a park	AD-PVE must review and clear; Approved by Director
Donation tied to advertising or marketing	Linked to advertising/marketing or promotional campaigns	Reviewed and cleared by Partnership Office.

* *The Donor Certification form, developed by the DOI, is still in draft and not yet been approved for use. See last page for interim guidance.*

VI. *Considering Direct Donations*

Considering Direct Donations

One of the main reasons for DO #21 is to ensure that all activities related to donations and fundraising maintain the *integrity* of our parks; the *impartiality* of the NPS; and *public confidence* in what we do.

A direct donation is one that is offered directly to a park by an entity that is not the Friends Group or Cooperating Association (or other authorized fundraising partner)

Under DO#21, the process for reviewing direct donations to the NPS is as follows:

- Donations/grants directly to NPS
- Donor self-certification form above \$25,000
- Coordination with NPO and other DOI bureaus \$250,000 or more, except for land donations and donations from federal, state and local governments, and educational institutions.

Direct Donations to the NPS

- Monthly call
- NPO queries offices with programmatic responsibilities in concessions, contracting, special park uses, & assessment of resource damages as well as the SOL.
- NPO coordinates with other bureaus and they conduct a similar search (once DOI guidance is fully implemented)
- Decision based on the information collected and an assessment of whether the acceptance of the donation will maintain will maintain the integrity, impartiality, & public confidence in NPS/DOI

Donations to Partners

- Most of the time donations are made to partners.
- Fundraising agreements detail what review partners must undertake before passing a donation through to the park when the donation is associated with a specific donor other than the partner
- NPS may not accept donations that associate NPS with alcohol or tobacco.
- A partner may accept donations from such industries for their own purposes.

In-Park Friend Raising

- Guest Donation Program
- Donation Boxes
- Events
- Brochures and Displays

Considering corporate donations?

- Is the proposed gift, philanthropy or one tied to marketing rights?
- Is there a product, in-kind, or cash donation?
- Will there be any advertising, marketing, promotion or public relations pertaining to the donation? If so, is it part of a national campaign?
- Product solicitations, sampling, & advertising within parks are strictly prohibited and will *not* be considered as a condition of any donation.
- Neither the Arrowhead nor a NPS employee (or any part of the uniform) may be featured in commercial advertising.

See section *VIII - Corporate Campaigns and Fundraising* for more information.

What about accountability?

- Donations to NPS are subject to the same standards of accountability and the same internal processes & protections as monies appropriated by Congress.
- Non-monetary gifts must be accounted for as any similar government property.
- NPS will develop standard procedures to document donation activities, including documentation of receipt and disposition of all real or personal property and establishment of distinct accounting elements to comply with donor requirements for conditional donations.

Capture your notes here



Partner Self-Certification Form – DRAFT



U.S. Department of the Interior Donor Certification Form

OMB form no.

Thank you for your interest in making a donation to the Department of the Interior or one of its bureaus (Bureau of Land Management, Bureau of Reclamation, Indian Affairs, Minerals Management Service, National Park Service, Office of Surface Mining, U.S. Fish and Wildlife Service, and U.S. Geological Survey). It is Interior's policy to ensure that in accepting donations, the Department maintains its integrity and impartiality, and the confidence of the public. The following certification helps the Department and you, the potential donor, to identify areas of concern that might be raised by a donation. An affirmative answer to any of the statements below does not mean a donation will be declined, but may initiate further review.

I am executing this Donor Certification Form as _____ an individual or _____ on behalf of the following organization: _____.

To the best of my knowledge and belief, I certify that:

1. I _____ am / _____ am not involved in litigation or other controversy with the Department or its bureaus.
2. I _____ am / _____ am not seeking or otherwise engaged in any type of financial or business relationship with the Department, for example, a contract, permit, lease, grant, or cooperative agreement.
3. I _____ have / _____ have not been debarred, suspended, proposed for debarment, excluded or disqualified under the nonprocurement common rule, or otherwise declared ineligible from doing business with any Federal government agency.
4. This donation _____ is / _____ is not expected to be involved with marketing or advertising.
5. I _____ am / _____ am not seeking to attach condition(s) to this donation.
6. This donation _____ is / _____ is not part of a series of donations to the Department or its bureaus.

For any affirmative answers above, please attach explanations. Please also identify any other circumstances not addressed in the above questions that may affect the Department's decision to accept your donation.

With my signature I hereby certify the above statements are accurate and attest that I am not aware of other issues regarding this donation that may be of concern to the Department. I also certify that this donation is not intended to influence any decision or action by the Department or to obtain any special treatment from the Department. I understand that the Department's acceptance of this donation does not constitute endorsement by the Department of me or my products or services.

Signature Printed Name Date

Organization E-mail address

City State Zip Daytime or Work Phone

Information collected via this form will be handled in accordance with the requirements of the [Privacy Act](#) and the [Freedom of Information Act](#) to attempt to ensure the greatest protection of personal privacy.

VII. *Philanthropic Agreements*

Remember - Fundraising can only be authorized through an agreement!

Allows a partner to:

- Undertake specific fundraising efforts
- Solicit and accept donations for the benefit of NPS

Models and templates for partnership agreements are found in many places:

DO#20: Agreements establishes NPS policies and procedures for administering agreements, and identifies and describe the types of agreements that the NPS enters into with Federal and non-Federal entities. These include: *Cooperative Agreements, Interagency Agreements, General Agreements (also known as MOUs & MOAs), and others.*

Sample/model agreements can be found on-line at the **NPS Agreements Handbook** website: <http://www.nps.gov/hfc/acquisition/agreements.htm>

DO#32: Cooperating Associations includes the *Cooperating Association Agreement*. This is the standard, non-negotiable agreement between the NPS and non-profits operating bookstores in national parks which help support the educational, scientific, historical, and interpretive activities of the NPS.

DO#21: Donations and Fundraising will include six model agreements in its Reference Guide associated with donations and fundraising activities:

1. *Friends Group Agreement*
2. *Basic Fundraising Agreement*
3. *Comprehensive Fundraising Agreement*
4. *Donation Acceptance Agreement*
5. *Corporate Campaign Agreement*
6. *Partnership Construction Agreement*

Specifically...

Friends Groups Agreement

Formalizes a relationship between the NPS and a friends group. May include authorization to conduct general (unrestricted) fundraising activities in support of the NPS such as annual or membership campaigns, planned giving, events, e-philanthropy, grants applications, donation boxes, etc.

Basic Fundraising Agreement

A “fill in the blank” form used to authorize a non-recurring fundraising effort by a partner that the NPS does not have an ongoing friends group relationship with and where the fundraising goal is more than \$25,000 but generally less than \$100,000.

Comprehensive Fundraising Agreement

An agreement authorizing a friends group or other partner to undertake a fundraising campaign for a specific project, such as raising money for a new visitor center, endowing a park’s education program or rehabilitating a trail system. Generally this kind of fundraising would involve the partner creating a campaign committee of its board, undertaking a fundraising campaign feasibility study, developing a fundraising plan, and then undertaking fundraising for the specific campaign project.

Donation Acceptance Agreement

Memorializes conditions placed by a donor and agreed to by the NPS. May be in the form of a letter for smaller-scale donations, or an agreement if for a larger-scale project.

Corporate Campaign Agreement

Used for donations that are tied to corporate advertising or marketing (sometimes called cause-related marketing) where the business provides assistance benefiting NPS and also seeks to promote its public image by associating itself with NPS, a park unit, and or a park support organization.

Partnership Construction Agreements

Used to authorize a partner, using donated funds, to construct a government asset (such as a visitor center or a trail). This agreement provides the safeguards that will be required of partners undertaking construction.

VIII. Corporate Campaigns and Fundraising

“Advertising or solicitation for corporate campaigns involving the promotion of specific brands, products, services or enterprises of a corporate partner or associated entity may not be conducted within national park units in order to maintain the long-standing policy of the NPS that parks not be commercialized.” --Director’s Order #21, Section 7 (f)

Philanthropy vs. Marketing

Corporations and businesses generally offer two primary forms of donations:

1. ***Philanthropic Donations***
2. ***Corporate Campaigns*** (a.k.a. donations tied to advertising)

The primary difference between the two forms of support is the use of advertising and marketing in corporate campaigns to promote a donation and a relationship between the business and the NPS or an NPS partner.

The NPS may accept and recognize Philanthropic Donations from corporations and businesses under the guidelines set forth in Sections 6 and 10 of Directors Order#21.

The NPS may *only* enter into *Corporate Campaigns* under the guidelines set forth in section 7.0 of Directors Order#21.

“Your brand is worth something. Make sure you know that and articulate that to your potential partner. It’s the value of your brand (and your ability to execute) that are worth something to a corporation.” - Kurt Aschermann, Chief Marketing Officer, Boys & Girls Clubs of America

NPS is a respected “Brand” with:

- Diverse Stories and Resources
- Loyal Employees
- Dedicated Volunteers

NPS has known “Equity” in its:

- Mission
- Protected Heritage
- Visitors
- Local and National Reach

What Triggers a Corporate Campaign Review?

- All proposed corporate support other than “no strings attached” philanthropic gifts from corporations should be considered a possible corporate campaign.
- National Partnership Office responsible for determining if all proposed campaigns are permissible.

What Qualifies as a Potential Corporate Campaign?

- Corporate proposal that generates a clear benefit for the NPS and is consistent with NPS mission.
- Corporation is clear it may not state or imply endorsement by NPS of any business, product, service or enterprise.
- Proposal does not include advertising in parks nor anything that would result in the commercialization of the parks.
- Neither the Arrowhead nor a NPS employee (or any part of the uniform) may be featured in commercial advertising that promotes a corporate brand, service, product, or enterprise.

ABC's of Corporate Campaigns

- A.** Everything beyond a traditional corporate philanthropic gift requires a written agreement.
- B.** Agreement tool will depend on scope and scale of corporate relationship/campaign.
- C.** Agreements should spell out expectations of all parties.
- D.** Identify the message and affiliation between the NPS (and/or partner) and the corporation.
- E.** List obligations of all parties (including NPS review of all public material prior to release).
- F.** Detail the messaging and marketing activities or identify joint process to develop with NPS approval.
- G.** Clearly state no advertising in parks, no commercialization of parks, no commercial use of the Arrowhead or Rangers, and no endorsement of business, products etc by NPS.



Checklist when Considering Corporate Partnerships and/or Corporate Donations

- ✓ Who did the call/proposal originate from? Corporate foundation? Corporate brand manager/marketing division? Advertising or PR firm? Friends Group?
- ✓ What is the proposed support? (cash, services, products, other)? Is the support appropriate, will it result in a clear benefit to the park, NPS; does it meet priority needs?
- ✓ Will there be any advertising, marketing, promotion or public relations? What is the scope and scale of PR or advertising activities? Is it at the state, regional or national level?
- ✓ Is the support part of a larger corporate effort to align with NPS (or have other parks been approached)?
- ✓ Is the company seeking to use the Arrowhead or a NPS employee (or any part of the uniform) in commercial advertising that promotes a brand, service, product or enterprise? NPS does not allow this.

"Cause-related marketing is a partnership between a for-profit and a nonprofit where each has something to offer the other, and both realize a benefit." - Kurt Aschermann, Boys and Girls Clubs of America

Example of other organizations brand standards

http://www.njpta.org/con_workshops/web101/PTAlogo.doc

NPS Message Project - NPS logo, tagline, position statement

http://www.graphics.nps.gov/binder_cdrom.htm

Corporate Social Responsibility

<http://www.csrwire.com/>

Association of Fundraising Professionals

www.afpnet.com

Cause Marketing Forum

www.causemarketingforum.com

Chronicle of Philanthropy

<http://philanthropy.com/>

AdAge

Adage.com

IEG

<http://www.sponsorship.com/siteInfo/aboutieg.asp>

IX. Donor Recognition

- ✓ Donor recognition is an important part of the cycle of “Friendraising,” and there are many ways to recognize donors, only a few of which are done in the park.
- ✓ DO #21 provides the overall guidance for recognizing NPS donors.
- ✓ Best practices vary in recognizing individuals, businesses, and corporations.

The ‘Cycle of Friendraising’

- The donor says “thank you” when they choose to make a gift
- Effectively recognizing donations can create a cycle of additional giving
- The human touch -- key to donor recognition

Why Recognize a Donation?

- A way to say “thank you”
- We’re required to accept and acknowledge gifts
- Documents the gift for the donor
- Demonstrates class, professionalism, and seriousness
- Encourages further engagement

Why Do Individuals Give?

- Affinity with the park’s mission and park people
- Want to make a difference
- Publicly demonstrates values and principles
- Provides a personal legacy
- Enhances social status

When recognizing individuals...

- ✓ Make it personal
- ✓ Tell them what their gifts has done
- ✓ Treat them like honored fiends
- ✓ Don’t ‘over-recognize’

Recognition Events

- Very appropriate and very important
- Highlights results
- Helps inspire others

Foundation Giving

- *Family* foundations are motivated as individuals
- *Community* foundations seek local impact
- *Philanthropic/educational* foundations seek to achieve focused outcomes
- *Corporate* foundations largely motivated by community profile

Business/Service Club Giving

- Usually motivated by pure desire to help
- Community image important

Corporate Giving

- Enhance profile for public and employees
- Marketing Department often leads the way
- Special considerations apply
- Corporate officials often share strong feelings about parks

A few words about logos...

#1 - Must avoid commercialism!

Logos permitted on (must embedded in credit line)

- ✓ Publications
- ✓ Video or film
- ✓ Temporary construction signs
- ✓ Special event banners and materials

Logos NOT permitted on

- ✘ Waysides or kiosks
- ✘ Equipment
- ✘ Donated items

Capture your notes here



Donor Recognition and DO #21... A Walk-Through

NON-site Donor Recognition

- Thank you letters
- Awards
- Publicity
- Park Publications
- Websites
- Events
- Mementoes

ON-site Donor Recognition

- Follow the 'Tasteful and Unobtrusive' Rule
- Be clear with donors
- Donors respect the need for recognition limits

Donor Walls, Boards or Books

- Good way to centralize recognition
- Can be egalitarian
- Threshold levels and duration
- Corporate names, but not logos, are fine
- Electronic possibilities

Credit Lines

- Short, discrete, and unobtrusive
- Appropriate on publications, electronic media, audiovisual productions, and temporary construction signs
- "This exhibit made possible by a generous contribution from..."

Capture your notes here



Displays and Plaques

- Tasteful and Unobtrusive
- "Made possible by ..."
- Rooms, facilities or features CANNOT be named

Special NPS Events

- Name of event must predominate
- Logos permissible
- Get written agreement in advance

Non-NPS Events

- DO #53 governs
- Don't commercialize the park

Interpretive Programs

- Appropriate to identify a donor if the interpretive program relates to what is being interpreted.
- Can reinforce the idea that people can make a difference
- May inspire future gifts

Donor Recognition Plans

- Just starting to roll out
- Developed at the park level, with Regional Director approval
- Can be very simple
- Park's and Partner's plans must be consistent

Should include

- Statement of philosophy
- Procedures for thanking donors
- Hierarchy of recognition
- Forms or in-park recognition
- Criteria for donor boards and walls
- How donations to partners will be recognized

The Bottom Line

- Donor recognition is both appropriate and important
- DO #21 is a great tool
- You are not alone – talk to others

Capture your notes here



X. Partnership Construction Process

- ✓ The Partnership Construction Process was developed to provide greater accountability, achievability and sustainability for NPS construction projects that involve fundraising
- ✓ The Process is both a responsibility of the NPS and the fundraising partner
- ✓ All construction projects \$500,000 or greater which involve fundraising for all or a part of the project must follow the Partnership Construction Process

Details of the Partnership Construction Process may be found in the DO #21 Reference Guide, in general:

1. The Reference Guide provides a flowchart generally describing the steps a partner and the NPS would take together to approve construction projects where all or part of the funds needed are raised by the partner.
2. Approval packages are submitted to a Regional Director or to the Washington Office through the Regional Director typically include:
 - Project overview/summary
 - Fundraising feasibility study
 - Fundraising plan (including donor recognition plan)
 - Partnership agreement (this is the general agreement that defines the ongoing relationship between NPS and the partner)
 - Fundraising agreement (specific to the campaign)

Capture your notes here



XI. Ethical Considerations & Reminders

- ✓ NPS employees are not authorized to solicit donations
- ✓ The NPS may not endorse, or appear to endorse, a company's product, service or enterprise
- ✓ NPS employees may not use their position in ways that might imply an endorsement of a commercial product, service, or enterprise.
- ✓ NPS employees may not serve on the Board (voting or ex-officio) or as an officer of a cooperating association, friends group, or other organization authorized to raise funds for the benefit of the NPS. They can however serve in a liaison capacity.
- ✓ The Partnership Office and your Ethics Office are good places to contact if you have a question about the ethics of a particular donation

Donations in the Media and Recognition without Endorsement

General Rule:

An employee shall not allow the use of his name or official title to endorse the products, services, or enterprises of another entity.

Endorsements

The rule is part of the Standards of Conduct, [5 CFR 2635.702(d)] which apply to *all* Federal employees.

- ***Exceptions to the prohibition***
 - When there is statutory authority to promote products, services, or enterprises
 - Compliance with agency requirements or standards, or achievement given under an agency program of recognition for accomplishment in support of the agency's mission

Corporate Donations

One of the best questions to ask when offered a donation from a business...

"Will there be any advertising, marketing, promotion or public relations pertaining to the donation?"

Example – what *IS* ok!

The Secretary of DOI may sign a letter to an oil company stating that its offshore operations are in compliance with safety standards required by the MMS, even though the company may later use the letter in a TV ad portraying itself as a steward of our natural resources.

Example – what’s *NOT* ok!

The NPS Director may not appear in a TV commercial where she talks about a backpack as the backpack of choice in our National Parks.

Does it cross the line?

Think about the distinction between the donation and the product or service for which the donor is more widely known.

Just remember...

- ✓ No NPS arrowhead
- ✓ No marks of other DOI bureaus
- ✓ No employees in uniform
- ✓ Focus on the donation

Resources to help you:

DOI Ethics Office

Melinda Loftin
202-208-7960

NPS Ethics Office – WASO

Peggy Moran-Gicker
202-354-1981

NPS Partnership Office

Karyn Ferro
202-354-2172

Appendix A – 2009 Donor Review Schedule

National Park Service
U.S. Department of the Interior



Memorandum

To: Regional and Program Partnership Coordinators
From: Program Manager, Partnerships and Philanthropic Stewardship (Partnership Office)
Date: January 22, 2009
Re: 2009 Donor Review (Vetting) Schedule

Following is the 2009 donor review schedule and other information to guide requests for donor review.

The 2008 schedule will be as follows:

February submissions due January 26th	August submissions due July 27th
March submissions due February 23rd	September submissions due August 24th
April submission due March 23rd	October submissions due September 28th
May submissions due April 27th	November submissions due October 26th
June submissions due May 26th	December submissions due November 23rd
July submissions due June 22nd	January 2008 submissions due December 28th

Note: These dates fall on the fourth Monday of each month (except the day after Memorial Day, Tuesday, May 26th).

Submission

Please send a list of any prospective or pending donations or grant requests that require review in accordance with Director's Order #21 (see below for a summary) to Karyn Ferro by the dates noted above. The submission should include the following information:

- 1) Recipient Park or Program
- 2) If the donation is being made to a Friends Group to support a park project or program please identify the Friends Group.
- 3) Description of the donation - dollar amount if a cash donation.
- 4) Purpose of the donation.
- 5) Name, mailing address, web address of donor.

It takes about a week for the Partnership Office to consolidate the requests and submit them to the reviewing offices. The reviewing offices include: NPS Offices of Contracting and

Procurement, Concessions, Environmental Quality, and Special Park Uses, and the DOI Solicitor's Office: Parks and Wildlife.

The review takes about 6 weeks from the date the package is sent to the NPS reviewing offices, earlier if there were no issues of concern to report. In the event there is need to conduct significant additional research before the Partnership Office can provide a response we will notify the appropriate offices as soon as we are aware of that need.

Summary of DO #21 requirements:

Director's Order #21, as updated to conform to the revised Departmental policy on Donations (374 DM 6), requires that **direct donations over \$250,000** be referred to the AD-Partnerships and Visitor Experience for review. This responsibility has been delegated to the Partnership Office. Direct donations are donations made directly to a park from an entity other than the park's authorized fundraising partner (Friends Group) or Cooperating Association. The threshold for review at the national level was raised from \$100,000 to \$250,000 in the revision of the Department and NPS policies.

Donations of land are not included in this review process, nor are donations from federal, state and local governments, or accredited educational institutions, or donations offered during and related to (declared) natural and other emergencies.

Director's Order #21 also requires all **direct donations of \$1 million or more** by the Director. Such donations should be submitted during this monthly review. In addition the Director's Order requires partners engaged in fundraising for the benefit of the NPS employ a review process for donations that would be expended on NPS projects. When **issues have been raised during the partner's review process** the donation is forwarded to NPS for review.

If you have any questions, please contact Karyn Ferro at 202-354-2172 or karyn_ferro@nps.gov.

Appendix B – Contacts

National Park Service Regional Partnership Coordinators

Region	Coordinator	Phone	Email
Alaska	Mike Tranel (AK Desk Officer)	202-208-6381	mike_tranel@nps.gov
Intermountain	Greg Kendrick Krista Muddle	303-969-2356 303-969-2356	greg_kendrick@nps.gov krista_muddle@nps.gov
National Capital	Wendy O'Sullivan Anne O'Neill	202-619-7492 202-619-7154	wendy_o'sullivan@nps.gov anne_o'neill@nps.gov
Northeast	Tom Dyer Nancy Woods	617-223-5166 617-223-5171	tom_dyer@nps.gov nancy_woods@nps.gov
Midwest	Marty Sterkel Mike Pflaum	402-661-1556 402-661-1550	marty_sterkel@nps.gov
Pacific West	Ray Murray	510-817-1439	ray_murray@nps.gov
Southeast	Chris Abbett	404-562-3175 x522	chris_abbett@nps.gov

National Partnership Office

John Piltzecker	Program Manager	202-354-2150	john_piltzecker@nps.gov
Karyn Ferro	Program Coordinator Donation and Fundraising policies; Friends Groups	202-354-2172	karyn_ferro@nps.gov
Linda Neal	Program Coordinator Partnership Construction	202-354-2171	linda_neal@nps.gov
Jeff Reinbold	National Park Foundation Liaison	202-354-6475	jreinbold@nationalparks.org
Rich Fedorchak	Partnership Training Manager	304-535-5053	rich_fedorchak@nps.gov

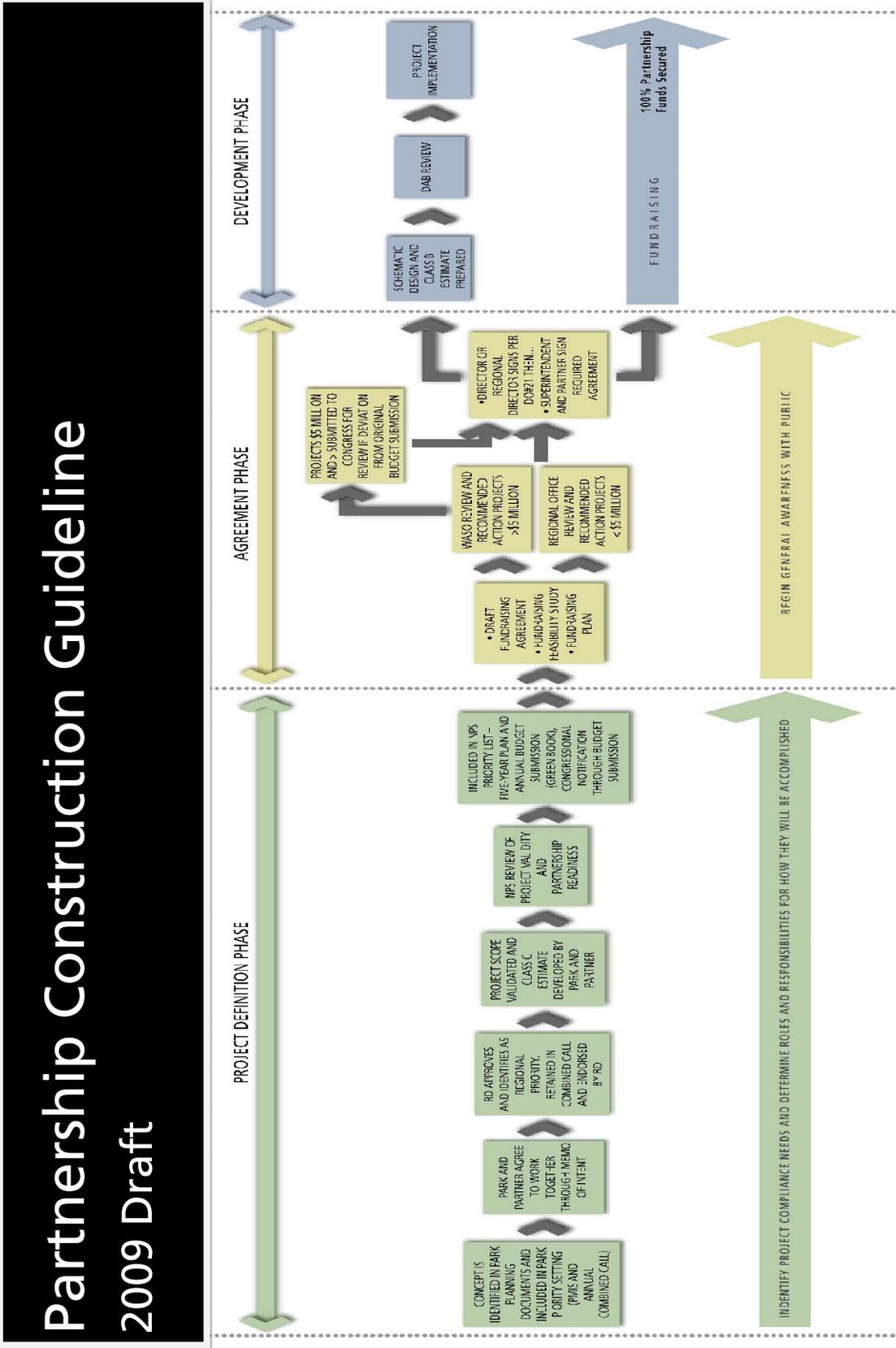
Appendix C – Related Sources of Information

- ❑ **NPS Management Policies** sets out the basic policies for the management of the national park system.
<http://home.nps.gov/applications/npspolicy/index.cfm>
- ❑ **Director's Order #1 on the NPS Directives System** provides an overview of the NPS directives system and describes the relationship among NPS Management Policies, Director's Orders and Reference Guides.
- ❑ Any requests for waivers related to the policies and directions provided in DO #21 must comply with DO #1 subsection on "Things to Know About NPS Policy."
- ❑ **Director's Order #20 on Agreements** provides additional guidance on other kinds of agreements that may be used to implement aspects of partnerships.
- ❑ **Director's Order #24 on Museum Collections Management** and the NPS Museum Handbook provide additional policy and guidance specific to museum collections.
- ❑ **Director's Order #25 on Land Acquisition** provides information on NPS policies regarding land acquisition and boundary adjustments whether through donations or other means.
- ❑ **Director's Order #32 on Cooperating Associations** provides additional policy and guidance specific to cooperating associations.
- ❑ **Director's Order #44 on Personal Property Management** provides additional policy and guidance on management of, and accountability for, donated personal property.
- ❑ **Director's Order #48A and #48B on Concessions** and Commercial Use Authorizations as well as the website of the Concessions Management Program contain the laws, regulations, and policy guidance on in-park

commercial operations including sales.

- ❑ **Director's Order #53 on Special Park Uses** contains additional guidance on special events.
- ❑ **Director's Order #70 on Internet and Intranet Publishing** establishes NPS policy on the development of NPS websites
- ❑ ***Standards of Ethical Conduct for Employees of the Executive Branch*** (5 CFR 2635.808).
http://www.usoge.gov/pages/laws_regs_fedreg_stats/oge_regs/5cfr2635.html
- ❑ ***Partnership Legal Primer*** provides a basic introduction to federal law and ethical considerations affecting partnerships. It can be found on the Department of the Interior's Partnership web page:
http://www.doi.gov/partnerships/partnership_legal_framework.html
- ❑ **Department of the Interior Departmental Manual: *Donation Guidelines*** (374 DM 6)
http://elips.doi.gov/app_dm/act_getfiles.cfm?relnum=3692
- ❑ ***"Ethics Issues in Partnerships"*** can be found at:
<http://www.doi.gov/partnerships/ethics.html>
- ❑ ***DO #21*** is available at: <http://www.nps.gov/policy/DOrders/DO21-reissue.html>
- ❑ **The *Reference Guide To Director's Order #21 - Donations and Fundraising*** can be found at:
<http://www.nps.gov/policy/DOrders/DO21-ReferenceGuide.html>

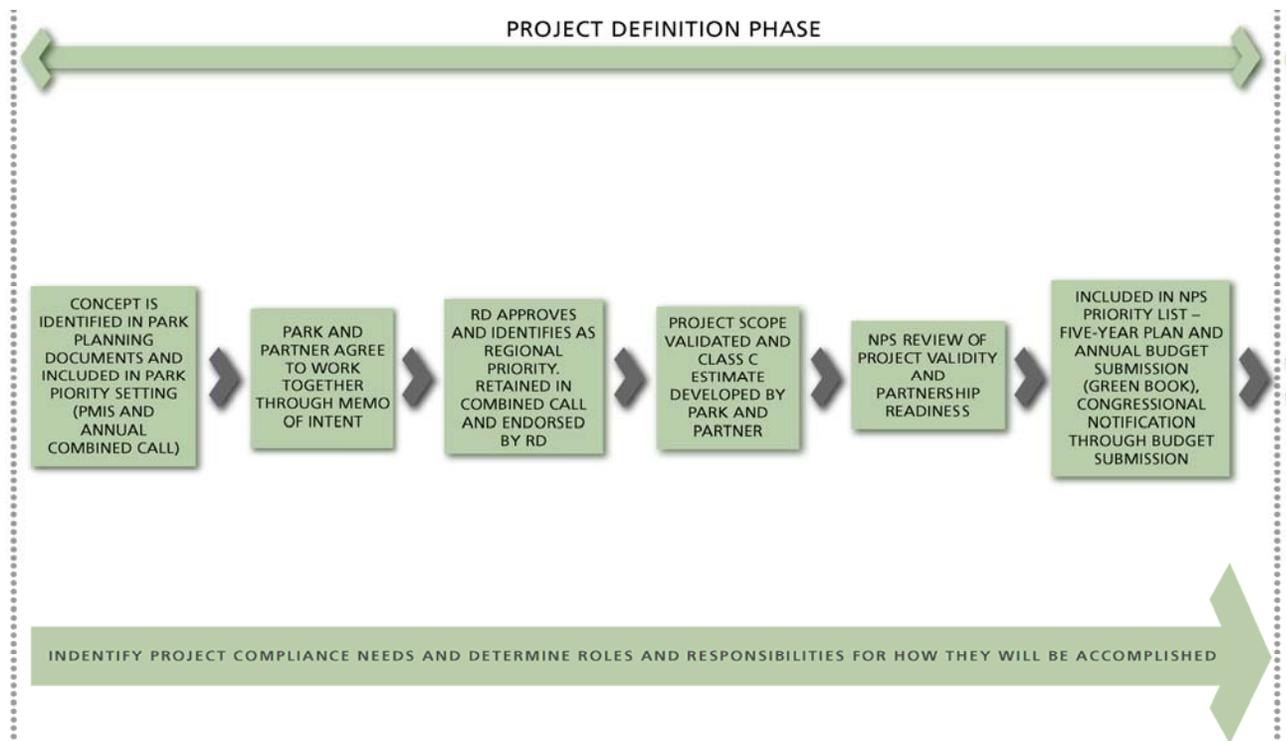
Appendix D – Partnership Construction



CHECKLIST FOR PARTNERSHIP CONSTRUCTION PROJECTS GREATER THAN \$500,000 BY PHASES OF PARTNERSHIP CONSTRUCTION GUIDELINE

The following provides a fuller explanation of the products and activities that should be undertaken during each phase of the partnership construction process. This checklist is meant to assist in the development of partnership construction projects and help move those projects through the process. It should be used for all partnership construction projects valued at \$500,000 and greater. It is also meant for all partnership construction projects, both public-private and public-public partnership in nature.

PROJECT DEFINITION PHASE



Block 1: “Concept is Identified in Park Planning Documents and Included in Park Priority Setting (PMIS and Annual Combined Call)”

- The concept is identified in an approved park general management plan and/or other park planning documents.
- The project is a desired priority for the park, and as such, is included along with the park’s other non-recurring needs in PMIS. If not presently identified in PMIS, the project must be entered into PMIS.
- The park staff has assessed the compliance requirements and prepared an initial plan to ensure that those and other statutory obligations will be met.

Block 2: “Park and Partner Agree to Work Together Through Memorandum of Intent”

- The project is determined through discussion with partner to be appropriate for a fundraising partnership.
- Through a Memorandum of Intent or other formal statement or agreement, the park and partner outline the project and the roles and responsibilities each party would assume with regard to the development of the potential project.
- There is a decision as to whether an endowment for operation and maintenance of the facility or other improvement will be established.

Block 3: “Regional Director Approves and Identifies as Regional Priority. Retained in Combined Call and Endorsed by Regional Director”

- The Regional Director has received and concurs with a statement of mutual interests.
- The Regional Director has determined that the potential partnership is ready to move forward and has identified it as a regional priority.
- A primary point of contact has been identified in the region to work with the park and partner on project-related issues.

Block 4: Project Scope Validated and Class C Estimate Developed by Park and Partner”

- The project’s scope, in terms of location, size and function, is clearly defined.
- Appropriate NPS planning models have been applied. Deviations from the models have been identified and justified. (Note: A project consistent with the model does not guarantee that NPS will deem the facility size acceptable.)
- The projected visitation of the facility has been determined and verified through accepted procedures.
- The gross construction cost of the project is clearly estimated (Class C).
- The estimated life cycle costs of operation and maintenance for the project to be incurred by the NPS and/or the partner (as applicable) are identified.
- The project’s architectural themes, style and vocabulary are established
- The proposed functions of the building or other improvement are further refined and fully described.
- Preliminary financial plan for the long-term operation and maintenance of the facility is developed. Sources of funding for operations and maintenance and the responsibility for generating such funding have been determined. Estimated revenue from the building, if applicable, is determined based upon elements of the building size and visitor use projections by qualified consultants.

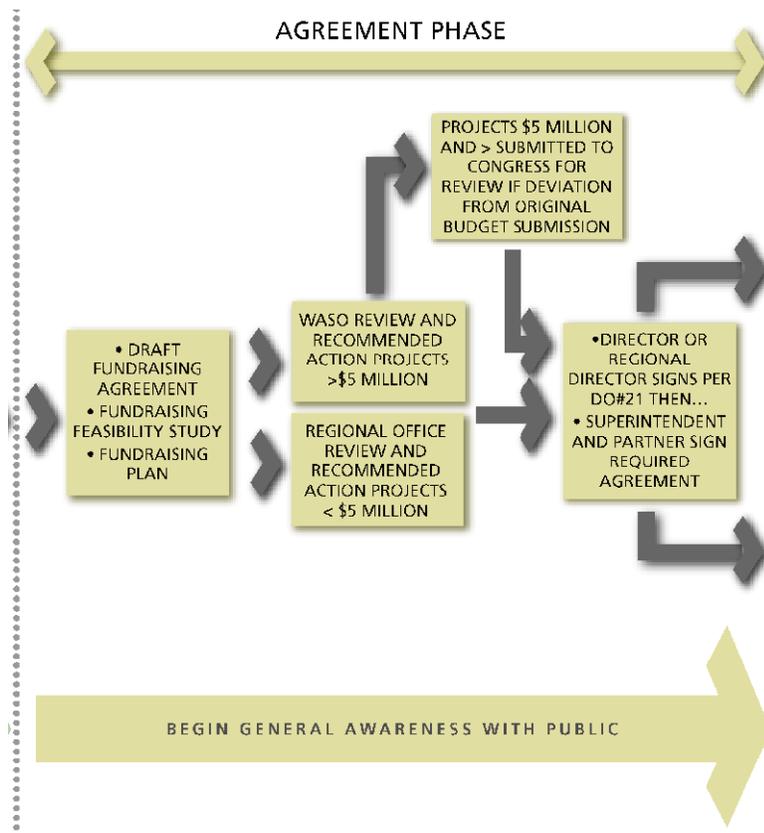
Block 5: “NPS Review of Project Validity and Partnership Readiness”

- The superintendent and the partner have demonstrated the capacity to undertake a project of this size and scope.
- The superintendent and partner have reviewed the relevant policy, and understand the partnership construction process and its requirements.
- The roles and responsibilities of the partners in the funding, construction, use and operation of the building are clearly delineated.
- The Regional Director has reviewed and approved the project to be submitted to DAB for review and approval of the concept.
- DAB has seen the project and approved the conceptual design.

Block 6: “Included in NPS Priority List – Five-year Plan and Annual Budget Submission (Green Book). Congressional Notification through Budget Submission”

- Project included in annual combined call and budget development for a park and included in a new section in the annual budget submission on partnership construction.

AGREEMENT PHASE



Block 1: “Draft Fundraising Agreement; Fundraising Feasibility Study; Fundraising Plan; Donor Recognition Plan”

- A fundraising agreement has been prepared with the input from the park contracting officer if appropriate, the Solicitor’s Office, the Regional Office and the WASO Partnership Office. The fundraising agreement should follow the template of the model fundraising agreement include the following elements:

- Clear delineation of the roles and responsibilities of the NPS and partners with regard to fundraising and managing the fundraising effort
- A statement that the partner has agreed that soliciting Congress is not to be part of

the fundraising strategy and a non-lobbying statement is included

- A strategy for addressing changes in the project or changing conditions that would require the project or fundraising goal to be revised
- A fundraising feasibility study has been conducted to determine if the proposed fundraising goal is feasible for the proposed project, and if not what level is feasible as well as how best to position the case statement, the board of directors, and the park support personnel to succeed in reaching the fundraising goal.
- A fundraising plan has been developed. Elements include: case statement, fundraising goal, results of the feasibility/planning study, target market or audience, the fundraising strategies, NPS role, acknowledgement and reporting requirements, fundraising budget, and the benchmark and evaluation pieces.
- A donor recognition plan has been developed.

Block 2A: “WASO Review and Recommended Action Projects \$5 million and Greater”

- All documents required under the partnership Construction Process and DO #21 have been prepared and submitted to the appropriate Regional Director for transmission to WASO. The Regional Director transmits the package with a recommendation for approval of the project based upon completion of the requirements of Partnership Construction Process and DO#21 to the AD-PPFL.
- Once the recommendation for approval memo accompanied by all documentation has been received by the WASO Partnership Construction Program Manager, the policy review will commence and be completed.

Block 2B: “Regional Office Review and Recommended Action for Projects Valued Under \$5 Million”

- All documents required under the partnership Construction Process and DO #21 have been prepared and submitted to the appropriate Regional Director for projects valued under \$5 million dollars. The Park Superintendent transmits the package with a recommendation for approval of the project based upon completion of the requirements of Partnership Construction Process and DO#21 to the Regional Director.
- Once the recommendation for approval memo accompanied by all documentation has been received by the Regional Partnership Construction Program Manager, the policy review will commence and be completed.

Block 3: “Projects \$5 million and Greater Submitted to Congress for Review if Deviation from Original Budget Submission”

- For projects valued \$5million and greater that have changed substantially (such as cost increase by greater than 20%, purpose of project changed, size expanded by 20% or more) since originally submitted in the “Greenbook” budget submission to Congress and that have satisfied the requirements of the partnership construction process and DO #21, a memorandum of recommendation will be prepared for transmittal by the National Partnership Office, AD-PVE and AD-PPFL, through the Deputy Director for Operations to the Director recommending that the project be submitted for congressional review and concurrence.
- With concurrence from the Director the project will be transmitted through the Department of the Interior to the Senate and House Appropriations Subcommittees for National Parks for concurrence.

Block 4: “Director or Regional Director Signs Fundraising Agreement per DO #21, then Superintendent and Partner Sign Required Agreement”

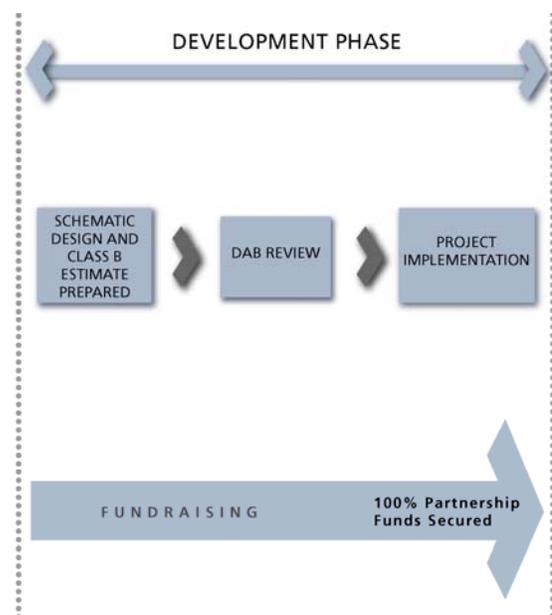
- For projects valued less than \$5 million that have satisfied all the requirements of the partnership construction process and have satisfied the requirements of DO #21, the project may be approved and the Regional Director signs the fundraising agreement. Three copies of the fundraising agreement should be signed.
- For projects valued at \$5 million and greater that have satisfied all the requirements of the partnership construction process and have satisfied the requirements of DO #21, the fundraising agreement may be signed by the Director and the project is approved by signature of the Director. Three copies of the fundraising agreement should be signed.

- For projects valued at \$5 million and greater that were required to be submitted to Congress, after the project has been successfully through the congressional review process, the fundraising agreement may be signed by the Director and the project is approved by signature of the Director. Three copies of the fundraising agreement should be signed.
- Upon the signature of the Regional Director for projects valued less than \$5 million and the signature of the Director for projects valued at \$5 million and greater, the NPS signed fundraising agreement is transmitted to the partner(s) for signature(s).
- The partner(s) signs the fundraising agreement and returns two signed copies to the NPS (one for the park, one for WASO or the Region).

DEVELOPMENT PHASE

Design Track: “Schematic Design and Class B Estimate Prepared; DAB Review; Project Implementation”

- All projects will proceed through the design process in accordance with established policy of the NPS for design and construction
- Projects must complete a presentation to the DAB, following established procedures.
- Once all funds are in hand, then the contracting process moves through the established rules and procedures of the NPS for contracting and construction.



Fundraising Track: “Fundraising and 100% Partnership Funds Secured”

- Partner undertakes fundraising in accord with approved fundraising plan and fundraising agreement
- Partner transfers funds to NPS prior to award of contracts. If the project is designed in a way that it can be completed in phases, partner may transfer funds as they become available for phases that have independent utility thus allowing a project to begin while fundraising continues for remainder of project phases.
- Changes in the scope or cost of the project, or the funding requirements of the NPS or the partner, may require that the fundraising agreements be revised and approved by the Director in accordance with the requirements of the “Agreements Stage.” Changes in scope and cost may also require DAB Review.
- Changes in the requirements of the fundraising campaign may require the fundraising agreement to be revised and approved by the Director in accordance with the requirements of the “Agreement Stage”.

Appendix E – Donor Bill of Rights

Donor Bill of Rights

Philanthropy is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To ensure that philanthropy merits the respect and trust of the general public, and that donors and prospective donors can have full confidence in the nonprofit organizations and causes they are asked to support, we declare that all donors have these rights:

- I.** *To be informed of the organization's mission, of the way the organization intends to use donated resources, and of its capacity to use donations effectively for their intended purposes.*
- II.** *To be informed of the identity of those serving on the organization's governing board, and to expect the board to exercise prudent judgment in its stewardship responsibilities.*
- III.** *To have access to the organization's most recent financial statements.*
- IV.** *To be assured their gifts will be used for the purposes for which they were given.*
- V.** *To receive appropriate acknowledgement and recognition.*
- VI.** *To be assured that information about their donation is handled with respect and with confidentiality to the extent provided by law.*
- VII.** *To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.*
- VIII.** *To be informed whether those seeking donations are volunteers, employees of the organization or hired solicitors.*
- IX.** *To have the opportunity for their names to be deleted from mailing lists that an organization may intend to share.*
- X.** *To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.*