

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

1.1 What is the purpose of Part 633, the Friends policy?

A. Part 633, the Friends policy, includes four manual chapters to assist U.S. Fish and Wildlife Service (Service) employees to achieve our mission more efficiently and effectively through partnerships with nonprofit Friends organizations (Friends).

B. These chapters describe the policy, guidance, and administrative procedures for Service employees to establish partnerships and working relationships with Friends organizations.

C. While these chapters are written to implement specific provisions of the National Wildlife Refuge System Volunteer and Community Partnership Enhancement Act of 1998, and the National Fish Hatchery System Volunteer Act of 2006, they also provide direction and administrative procedures for other Service programs seeking to establish and work with Friends organizations.

D. The two Acts cited in section 1.1C above encourage the Service to:

(1) Enter into partnerships with non-Federal entities such as Friends organizations to promote public awareness of the resources of the National Wildlife Refuge and Hatchery Systems and facilitate public participation in the conservation of those resources, and

(2) Accept donations of funds and other contributions by people and organizations through partnerships with non-Federal entities such as Friends organizations.

1.2 What is the scope of Part 633?

A. Although this policy is based on the Refuge and Hatchery System Friends partnership programs, it provides direction for all Service employees and program areas seeking to establish and work with Friends organizations.

B. Employees should also consult with their Regional Friends Coordinator or designated Regional Liaison for additional guidance when preparing a Friends Partnership Agreement, its supplemental agreement, and for questions beyond the scope of this policy.

1.3 What are the objectives of this chapter? This chapter:

A. Identifies authorities for partnering and working with Friends organizations;

B. Describes the roles, responsibilities, and ethical considerations of Service employees working with Friends organizations;

C. Defines Friends and the difference between Friends and volunteer activities; and

D. Outlines Service expectations of Friends organizations.

1.4 What are the authorities and policy we use for working with Friends organizations?

A. Following are the authorities for this policy:

(1) The Fish and Wildlife Act of 1956 (16 U.S.C. 741a-742j).

(2) The National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd-ee), as amended.

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

- (3) The Refuge Recreation Act of 1962 (16 U.S.C. 460k - k-4), as amended.
- (4) The Anadromous Fish Conservation Act (16 U.S.C. 757a-757g), as amended.
- (5) The Fish and Wildlife Coordination Act of 1934 (16 U.S.C. 661-667e), as amended.
- (6) The National Wildlife Refuge System Volunteer and Community Partnership Enhancement Act of 1998 (16 U.S.C. 742f), as amended.
- (7) The National Fish Hatchery System Volunteer Act of 2006 (16 U.S.C. 760aa, 1-4).

B. We closely follow these Service policies while implementing the requirements in Part 633:

- (1) Coordination and Cooperative Work with State Fish and Wildlife Agencies (601 FW 7).
- (2) Appropriate Refuge Uses (603 FW 1).
- (3) Compatibility (603 FW 2).

1.5 What are the responsibilities of Service personnel related to this policy?

A. The **Director** establishes national policy, guidance, and administrative procedures for Service employees working with Friends organizations.

B. Headquarters Directorate members:

- (1) Provide national oversight of Friends partnership activities,
- (2) Ensure compliance with policies when conducting partnership activities with Friends organizations, and
- (3) Encourage relationships and mutually beneficial partnerships with communities through Friends organizations.

C. The National Friends Program Coordinator:

- (1) Evaluates the progress of the Refuge System's Friends partnerships;
- (2) Provides expertise to other program areas seeking to establish and maintain Friends organizations;
- (3) Develops, coordinates, and disseminates policy and standards of operations for the Friends program;
- (4) Provides guidance and technical assistance to field and Regional offices on the Friends program;
- (5) Develops, coordinates, manages, delivers, and encourages the growth of the program Servicewide;
- (6) Establishes and maintains national partnerships to support the Friends program;
- (7) Develops, coordinates, and manages training programs and other support programs for the Friends program; and

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

Public Use Management

Part 633 Friends Organizations

Chapter 1 Working with Friends Organizations

633 FW 1

(8) Provides leadership and direction for the overall program.

D. Regional Directors:

(1) Provide leadership for Friends partnerships in their Regions and designate a Regional Friends Coordinator to guide this function, and

(2) Review, approve, and sign Friends Partnership Agreements and supplemental agreements with Friends organizations or designate an employee to perform these functions.

E. Regional Friends Coordinators (or designated Regional Liaisons):

(1) Evaluate the progress of the Refuge System's Friends partnerships in their Regions;

(2) Provide expertise to other program areas seeking to establish and maintain Friends organizations;

(3) Assist in implementing the national Friends program;

(4) Disseminate information to Friends, Project Leaders, and Service Liaisons;

(5) Provide guidance and technical assistance to field offices;

(6) Suggest training for Service employees and Friends in their Regions; and

(7) Provide support to the Project Leaders and Friends organizations in developing new and modifying existing Friends Partnership Agreements, review completed agreements and process them for the Regional Director's approval and signature, and ensure agreements within their Regions do not lapse (see 633 FW 3).

F. The Project Leader or his/her designee:

(1) Serves as the Service Liaison with the Friends organization or designates an employee to serve in that role (see section 1.5G);

(2) Assesses the needs of the Service site/program and compares them with the benefits and costs of partnering with a Friends organization. To make this assessment, the Project Leader must consider:

(a) Compatibility with Service site/program mission and objectives,

(b) Community involvement,

(c) Future plans for the site/program,

(d) Funding, and

(e) Staffing levels required to participate in and sustain a Friends partnership;

(3) Works with the Friends organization to develop new or modify an existing Friends Partnership Agreement and seeks the assistance of the Regional Friends Coordinator (or designated Regional Liaison) to do so, and sends the completed agreement to the Regional Friends Coordinator (or Regional Liaison) for review and to get the approval and the signature of the Regional Director (see 633 FW 3);

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

Public Use Management

Part 633 Friends Organizations

Chapter 1 Working with Friends Organizations

633 FW 1

(4) Annually orients the Friends Board of Directors on the Department, Service, program, and site's mission, goals, objectives, scope of operations, and the many programs that play a role at the site/program, such as visitor services, biology, law enforcement, maintenance, etc.;

(5) Annually meets with the Friends Board of Directors to review and assess the effectiveness of the partnership as it relates to the purpose, goals, objectives, roles, and responsibilities outlined in the Friends Partnership Agreement to ensure expectations are clear and realistic;

(6) Disseminates information to Friends and Service Liaisons;

(7) Advises Friends on ways in which they can assist the Service and maintains regular communications with Friends about the site/program operations;

(8) Works with the Friends on the ongoing development of programs, activities, and projects that support the site's annual work plans, Comprehensive Conservation Plans, and other management plans;

(9) Ensures that the time Service site staff members invest in the partnership is efficient, effective, and sufficient;

(10) Helps identify and provide opportunities for the Friends to develop skills that will increase their effectiveness and help the organization assist the Service;

(11) Helps identify and provide opportunities for training and skill development for him/herself as well as for the designated Service Liaison that will improve the Service's effectiveness in working with Friends partnerships;

(12) Helps identify opportunities for recognition of Friends accomplishments and ensures Friends are included in recognition functions;

(13) Ensures that Friends sales items, publications, and other services or programs are consistent with the Friends Partnership Agreement, and the mission, goals, and objectives of the Service;

(14) Ensures that all net funds the Friends collect through activities that directly solicit donations (e.g., silent auction, plant sale, benefit event) on Service-managed property are deposited in the appropriate Service contributed funds account (e.g., Gifts account, Community Partnership Enhancement Donation Receipt account) (see 633 FW 4);

(15) Ensures that Friends obtain and hold insurance for certain specialized activities (e.g., water-related activities, use of live wildlife at an event, selling food); and

(16) Attends Friends meetings, as a Service employee, when the Friends require information or support to carry out the joint activities described in the Friends Partnership Agreement.

G. Service Liaisons (may be the Project Leader or a staff person he/she designates to serve as liaison to the Friends):

(1) Work closely with the Friends to provide regular communication and coordination of mutually developed programs and projects;

(2) Disseminate information to the Friends that could help them achieve mutual goals and objectives of the partnership;

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

Public Use Management

Part 633 Friends Organizations

Chapter 1 Working with Friends Organizations

633 FW 1

- (3) Work with other staff members to provide the Friends with updates and presentations on activities associated with the site/program;
- (4) Attend Friends meetings, as a Service employee, when the Friends require information or support to carry out the joint activities described in the Friends Partnership Agreement;
- (5) Ensure that Friends board members complete and sign a Volunteer Services Agreement (Optional Form (OF) 301A), and ensure that the scope of the volunteer services (duties) to be performed are accurately described in the "description of service to be performed" section of the agreement;
- (6) Assess fulfillment of the Friends Partnership Agreement;
- (7) Assess routine operation of any nature store to ensure consistency with Service policies (see 633 FW 4);
- (8) Provide the Friends organization with information about training and grant opportunities to facilitate the accomplishment of the goals of the partnership;
- (9) Work closely with their supervisor or Project Leader to identify and attend training that will build skills and improve their effectiveness in working with the Friends organization;
- (10) Brief Project Leaders and other staff regularly on Friends activities and projects; and
- (11) Plan and coordinate opportunities to recognize Friends for their accomplishments and achievements for the Service.

1.6 What are Friends organizations and what is their purpose?

A. The Service partners with many types of nonprofit organizations, but Friends organizations are unique, and we define them by the following qualifications:

- (1) Friends must have nonprofit status under Section 501(c)3 Title 26 of the Internal Revenue Service (IRS) code.
- (2) Friends are established with an organizational mission of supporting the purposes and objectives of a Service site or program with which they are affiliated.
- (3) Friends cooperate with the Service under an approved Friends Partnership Agreement (and often a supplemental agreement) that defines and describes the scope of the partnership.
- (4) Friends most commonly support a single Service site, but may support multiple Service sites, offices, or programs. They may also serve as an umbrella group for other Friends organizations, as long as they meet the qualifications above and such arrangements are formalized in a Friends Partnership Agreement.

B. Friends organizations are most commonly formed and managed primarily by community volunteers and provide many vital volunteer services to the Service, including community outreach; coordinating special events; developing and delivering educational, interpretive, and other visitor services programs; coordinating volunteers; and conducting habitat restoration and biological and maintenance program support. While performing these functions on behalf of the Service, Friends are Service volunteers who must work under an approved Volunteer Services Agreement (OF 301A).

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

C. Members of Friends organizations may engage in lobbying and solicitation of donations, but they are prohibited from doing these activities when they are actively working as a Service volunteer. Friends are also prohibited from engaging in lobbying activities on Service-managed property and using direct or indirect appropriated Federal funds, resources, or other Federal support to conduct lobbying activities. When volunteering for the Service, Friends members must comply with Service and Departmental policies (see sections 1.11, 1.12B, and 1.17). See the example below.

Jake Smith volunteers once a week maintaining trails and doing other odd jobs for his local refuge's Friends organization. He wants to call his Congresswoman to lobby for funds for the refuge to build a larger visitor center. He can do this as a Friends member, but he cannot do it while volunteering for the Service or on Service-managed property. He also cannot report the time he spends contacting the Congresswoman as Service volunteer hours.

1.7 What if an existing Friends group does not meet the qualifications of a Friends organization as defined by this policy?

A. This policy clearly defines the Service's unique relationship with Friends organizations and establishes policy for staff working with Friends through Friends Partnership Agreements. We value opportunities to work cooperatively with other types of partners in wildlife conservation. Other partners may be 501(c)3 nonprofit organizations, volunteer groups, cooperating associations, or coalitions of organizations that may have broader landscape or single-species missions. Some may even support multiple partners whose missions or management objectives are not the same as the Service's. Our partnerships with Friends are unique and different from other wildlife conservation partnerships because Friends are established with an organizational mission of supporting the purposes and objectives of a Service site or program with which they are affiliated.

B. Those partners that do not meet the definition of a Friends organization in this chapter will need special consideration from Project Leaders to define the partnership through other instruments, such as a Memorandum of Understanding, Cooperative Agreement, or Volunteer Services Agreement.

1.8 Does the Service consider cooperating/interpretive associations to be Friends organizations?

Although cooperating associations were formed in the early years of the Friends program and some still exist today, new cooperating associations are rarely, if ever, formed today as Friends organizations. The Service's relationship with existing cooperating associations is not necessarily affected by this policy as long as those groups meet the definition of Friends as described in section 1.6A and the relationship is described through a Friends Partnership Agreement. If an existing cooperating association's activities are beyond the scope of Friends activities described in this policy, we may need to redefine the relationship as something other than a Friends partnership.

1.9 How do Friends organizations compare to concessionaires? Friends organizations and concessionaires are very different from each other and must be treated as such.

A. A concessionaire is any person, corporation, or organization operating a commercial visitor services business under a concession contract (awarded after competition) for the recreational, educational, or interpretive enjoyment of the visiting public. We award concessions contracts only where public visitation is

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

sufficient for a sustainable venture and additional recreational opportunities are necessary for the full enjoyment of the public.

B. While a nonprofit organization could apply for and be awarded a concession contract, the mission work of Service Friends organizations is on behalf of the Service. A Friends organization isn't a concessionaire, which is a private entity that undertakes activities for monetary gain or profit for itself.

1.10 How do Friends organizations compare to Service volunteers?

A. In most ways, Friends and volunteers are the same. Friends members often perform the same functions as our volunteers. For example, they may lead environmental education programs and site tours, help with biological programs, conduct community outreach, and staff special events. Individual Friends are the same as Service volunteers when engaged in these activities, on or off-site, under the supervision of the Service and with an approved Volunteer Service Agreement that clearly describes the duties and location of the volunteer activity (also see section 1.11 and 150 FW 1, Policies, Procedures, and Responsibilities for Volunteers).

B. Friends organizations may participate in some activities that cannot be done by Service volunteers. Any work associated with lobbying, soliciting donations, games of chance, and the operation or administration of the organization and its programs are distinctly Friends functions that cannot be included in the Service's volunteer program or count toward a site's total volunteer hours. Friends cannot represent themselves as Service volunteers while performing these activities (see section 1.12B). Additionally, Friends organizations are prohibited by law from using appropriated Federal funds, resources, or support to conduct lobbying activities. The Friends organization has the discretion to count those hours in some other way (e.g., as its own community service hours). Our work with Friends organizations must comply with the following gambling, lobbying, and fundraising policies and laws:

- (1) 50 CFR 27.85, Gambling;
- (2) 5 CFR Part 735, Employee Responsibilities and Conduct;
- (3) 41 CFR 101-20.306, Management of Buildings and Grounds;
- (4) 18 U.S.C. 1913, Lobbying with Appropriated Moneys; and
- (5) 374, DM 6, Donations Guidelines.

1.11 Do Friends members need to sign Volunteer Services Agreements? Individual Friends members who work in an official Service volunteer capacity (see section 1.12) must complete a Volunteer Services Agreement (OF 301A). The Volunteer Services Agreement covers the individual volunteer for tort claims under the Federal Tort Claims provisions (28 U.S.C. 2671) and for injuries under the Federal Employees Compensation Act (5 U.S.C. 81). There are several elements to a Volunteer Services Agreement that require careful attention (also see 150 FW 1-3, Volunteer Services Program):

A. Each individual Friend must fill out a Volunteer Services Agreement before beginning volunteer work. The Agreement is not intended as a blanket volunteer agreement for Friends organizations. For tort claims and injuries, the Volunteer Services Agreement only covers volunteers as individuals, not the entity of the Friends organization.

B. It is the responsibility of Service employees to ensure that the scope of the volunteer services (duties) the volunteer will perform are accurately described in the "description of service to be performed" section of

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

the agreement. Failure to complete this section of the agreement with the appropriate amount of detail could result in legal complications if there is a tort claim or injury.

C. Agreements are effective for up to 1 year, and must be reviewed and modified annually and any time a change is made to the volunteer's scope of work, including (but not limited to) the use of equipment, assignment locations, and physical activity requirements. Keeping the agreement up-to-date is important to ensure fair protection for tort claims and injuries, especially as the complexity of the volunteer assignment increases.

1.12 Should Project Leaders include work contributions by Friends members in their annual site volunteer totals?

A. Yes, Project Leaders should include Friends members' and Friends employees' (if the Friends employee is not paid by the Service) work contributions in their annual volunteer totals as long as they are performing official Service volunteer activities, on or off Service-managed property, under an approved Volunteer Services Agreement. Official Service volunteer activities may include, but are not limited to:

- (1) Leading Service environmental education programs and site tours;
- (2) Helping with Service biological and maintenance programs;
- (3) Planning, conducting, or staffing community outreach activities on behalf of the Service;
- (4) Staffing Service visitor centers and special events;
- (5) Implementing grant projects in support of joint goals of the Friends organization and the Service;
- (6) Attending training and conferences that will be beneficial to the Service, are sponsored by the Service, and are approved by the Project Leader; and
- (7) General board meetings when the agenda is focused on the direct support of the Service or joint goals and not the operation or administration of the Friends organization (see section 1.12C).

B. Project Leaders must not include as official Service volunteer hours the time Friends spend on any activities that neither Service employees nor Service volunteers are permitted to do and are not in direct support of the Service mission (see section 1.15C). These prohibited activities include:

- (1) *Lobbying*: Influencing or attempting to influence members of Congress or any government official on legislation. Legislation includes action by Congress, any State legislature, any local council, or similar governing body, with respect to acts, bills, resolutions, or similar items, or by public referendum, ballot initiative, constitutional amendment, or similar procedure (see 1.10B).
- (2) *Soliciting donations*: Commonly referred to as "fundraising," soliciting for donations includes seeking donated funds or other non-monetary or in-kind gifts such as services, items, and real property from a non-Federal entity, group, or individual without consideration or an exchange of value (see section 1.10B).
- (3) *Games of chance or gambling*: Examples include, but are not limited to, raffles for a fee, door prizes for a fee, lotteries, BINGO, etc. (see section 1.10B and 633 FW 4).

C. As stated in section 1.12A(7), we cannot include activities for operation and administration of a nonprofit organization as volunteer services. Examples of operation and administration include, but are not limited to, serving on a Friends Board of Directors; the administration of a Board of Directors and its employees;

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

completing State and Federal nonprofit requirements, such as writing bylaws and applying for 501(c)3 status; board meetings that are focused on the business and management of the board and organization, the operation and administration of a nature store; developing organizational documents, executing business transactions, and completing grant applications on behalf of Friends; maintaining the Friends Web site or social media sites; and creating newsletters.

1.13 What activities must Project Leaders ensure that Friends do not participate in on Service-managed property? Project Leaders must not:

- A.** Involve Friends in law enforcement activities;
- B.** Involve Friends in any Service administrative functions that are sensitive in nature, such as employee hiring, discipline, or other activities that would require access to personnel files or materials protected by the Privacy Act;
- C.** Involve Friends in hazardous activities without proper certifications;
- D.** Permit Friends to participate in lobbying and games of chance on Service property;
- E.** Allow Friends to participate in and promote activities that are inconsistent with the National Wildlife Refuge System Improvement Act, Departmental and Service policies, and the objectives or purposes of the Service site or program with which they are affiliated; or
- F.** Allow Friends to influence decisionmaking processes related to fish and wildlife management that may be inconsistent with the Service's compliance with State laws and regulations or affect our timely coordination and consultation with the States on the acquisition and management of national wildlife refuges (see 601 FW 7, Coordination and Cooperative Work with State Fish and Wildlife Agencies).

1.14 What is the Service's role in establishing new and maintaining Friends organizations? Although we may actively encourage the formation of Friends organizations to assist us in attaining our mission, the Service and its employees are prohibited from actually forming Friends organizations (e.g., formally recruiting citizens to fill board positions, completing IRS applications, developing organizational documents). Members of the public must form Friends organizations, and their formation must comply with the requirements of applicable State and Federal laws regarding incorporation, charitable status, etc. However, Service employees may provide certain resources to help in establishing and maintaining Friends organizations. For example, they may:

- A.** Provide office space and help with organizing and hosting Friends meetings, including consulting with interested citizens about the Service's interest in establishing a Friends organization or providing information about vacant board positions;
- B.** Provide information, technical assistance, training, and mentoring to the board to increase the effectiveness of the Friends organization or the Service-Friends partnership, or both;
- C.** Engage the Friends organization in strategic planning opportunities for the partnership to help identify joint projects between the Service and Friends (e.g., general board meetings or special retreats, Service annual work planning meetings, Service staff meetings). Employees can find guidance for possible projects by reviewing appropriate management and planning documents (e.g., Comprehensive Conservation Plans, Visitor Services Plans);
- D.** Provide a variety of support services to Friends at local, State, Regional, and national levels;

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

E. Provide opportunities for recognition of Friends organizations; and

F. Participate in Friends activities, programs, services, projects, and meetings that help meet the joint goals of the partnership, whether on or off-site, except when they contain the prohibited activities we describe in section 1.12B.

1.15 May Service employees and volunteers be Friends members and serve on a Friends Board of Directors?

A. Service employees may:

(1) Be members of Friends organizations, pay membership dues, and participate in membership votes in their personal capacity (as a private citizen on their own time). Service employees, even in their personal capacity, must still avoid participating in any Friends activities that could be a conflict of interest or perceived as one. For more information, contact your Regional Ethics Counselor and see 212 FW 4.

(2) Serve on Friends committees in an official capacity as long as those committees are not involved in lobbying, games of chance, solicitation of donations, or the operation and administration of the organization (see section 1.12B). Committees are a way for employees to assist in the mutual goals of the partnership.

B. Service volunteers may:

(1) Be members of Friends organizations, serve on a Friends Board of Directors, pay membership dues, and participate in membership votes in their personal capacity (as a private citizen on their own time); and

(2) Perform volunteer work for the Friends organization as a Service volunteer as long as the work supports mutual goals of the partnership under an approved Volunteer Services Agreement and meets the guidance on volunteer work contributions in section 1.12.

C. Service employees and volunteers must not (see Table 1-2):

Table 1-2: Prohibitions for Employees and Volunteers Working with Friends		
Activity	Can they perform this activity?	
	Employees	Volunteers
(1) Serve on a Friends Board of Directors or represent the Friends organization.	No.	Yes, but only as a Friends member— not in their official capacity as a Service volunteer (any hours they spend doing this cannot be counted toward total Service volunteer hours).
(2) Participate in any Friends organization's activities when there may be a conflict of interest or a perceived conflict of interest.		
(3) Participate in formal decisionmaking, voting procedures, or the operation or administration of the Friends Board of Directors (see 1.12B).		
(4) Serve the Friends in any fiduciary capacity.		
(5) Negotiate or execute contracts for the Friends organization or represent the Friends organization in any matter between a Federal court or agency, in business transactions or operations, and soliciting for and collecting paid memberships.		

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

Table 1-2: Prohibitions for Employees and Volunteers Working with Friends		
Activity	Can they perform this activity?	
	Employees	Volunteers
<p>(6) Use appropriated funds (including official employee time and Government resources) for Friends activities and events that are intended or designed (directly or indirectly) to:</p> <ul style="list-style-type: none"> • Influence in any manner a member of Congress, a jurisdiction, or an official of any government (Federal, State, or local) to favor or oppose any legislation, law, or appropriation (18 U.S.C. 1931, Lobbying with Appropriated Moneys). • Solicit for donations or raise funds through games of chance (see 633 FW 4). 	No.	No.

D. When participating in Friends organizations, Service employees must comply with 43 CFR Part 20, Employee Responsibilities and Conduct.

1.16 What responsibilities should the Service require of Friends organizations? The Service should require that Friends organizations:

A. Work with the Service to achieve the purposes defined in the Friends Partnership Agreement and any supplemental agreements and ensure that the time Service site staff invest in the partnership is efficient, effective, and sufficient.

B. Independently manage the legal, financial, personnel, and administrative activities and responsibilities of the organization (see 633 FW 2).

C. Identify a Friends Liaison, typically the President or other board member, to facilitate communication with the Project Leader or Service Liaison about Friends activities and projects.

D. Coordinate with the Project Leader or Service Liaison (if different from the Project Leader) on all activities, programs, services, and projects related to meeting the joint goals of the partnership.

E. Notify and invite the Project Leader and Service Liaison to Board of Directors and committee meetings that require Service information and support to carry out joint activities.

F. Ensure that Friends members and their employees do not act in any way that leads to the public perception that they are Service employees. This does not keep Friends from conducting routine volunteer services (as a Service volunteer), such as working in a visitor center or performing interpretive activities.

G. Ensure appropriate identification (e.g., logo shirt, name badge) of Friends members and Friends employees while acting on behalf of the Friends organization on Service-managed property.

H. Avoid any implication in all of its activities that the Service endorses a particular commercial product, political position, or fundraising activity (see 633 FW 4).

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

Public Use Management

Part 633 Friends Organizations

Chapter 1 Working with Friends Organizations

633 FW 1

I. Transfer all net funds collected through activities that directly solicit donations (e.g., silent auction, plant sale, benefit event) on Service-managed property directly to the Project Leader to be deposited in the appropriate Service contributed funds account (e.g., Gifts account, Community Partnership Enhancement Donation Receipt account) (see 633 FW 4).

J. Display a sign that identifies nature stores as nonprofit activities of the Friends organization in support of or on behalf of the Service site/program (see 633 FW 4).

1.17 May the Project Leader extend the use of Service facilities, equipment, and vehicles to a Friends organization? Yes, Friends may use Service facilities, equipment, and vehicles consistent with Service and Departmental policies and guidelines and as mutually agreed-upon within an approved Friends Partnership Agreement.

A. Departmental policies and guidelines prohibit Friends organizations from using appropriated Federal funds and Federal facilities and equipment, including but not limited to Government-provided office space, vehicles, telephones, computers, printers, faxes, or copy machines to conduct lobbying activities. For example, Friends meetings that are held to discuss influencing a Member of Congress or specific legislation must not be held in Government-provided meeting space, and emails must not be composed on Government-provided or Friends-owned computers on Service-managed property. The same applies for administering games of chance (see section 1.10B, 1.12B, and 633 FW 4).

B. Friends use of Government facilities and equipment (access to non-public areas, federally-controlled information systems, etc.) must comply with Homeland Security Presidential Directives (HSPD) that mandate common identification standards for Federal employees, volunteers, Friends, and contractors before they can use the facilities, equipment, or information. Friends representatives may need to obtain Federal security clearances to conduct the business of the Friends organization on Service-managed property and equipment.

C. Friends may operate Government-owned vehicles to assist the Service in carrying out Service programs if the individuals are working as an official Service volunteer under an approved Volunteer Services Agreement (OF 301A). Friends, when serving as volunteers in Government-owned vehicles, either driving or as passengers, may represent their Friends organization as it relates to the mutual goals of the Service and the organization, but they must not engage in any prohibited activities while operating Government-owned vehicles (see section 1.12B, 633 FW 4, and 320 FW 5, Motor Vehicle Use, Operation, and Storage).

D. The Project Leader must ensure that the Friends organization is providing reasonable care, maintenance, and housekeeping of the Service property/facilities/equipment they are using.

E. The Project Leader may allow the Friends organization to alter Service facilities through redesign, renovation, or construction, with prior approval, to carry out new sales, storage, or routine work. If the redesign, renovation, or construction is extensive, the terms of such renovation and use should be described and approved in the Friends Partnership Agreement. All permanent improvements a Friends organization makes to Service facilities become the property of the Service. Nonpermanent or portable improvements belonging to the Friends organization remain the organization's property. The Project Leader may require Friends to repair any damages made to Service facilities as a result of the installation of nonpermanent improvements.

F. The Project Leader retains the right to have emergency access to all Service facilities that Friends organizations use.

G. The Project Leader may withdraw the use of land or withdraw, modify, or relocate facilities, equipment, or vehicles from Friends at any time for management or emergency reasons. Whenever possible, the

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

Public Use Management

Part 633 Friends Organizations

Chapter 1 Working with Friends Organizations

633 FW 1

Project Leader should give the Friends organization a 60-day written notice and meet with the Friends President or Executive Director beforehand to discuss relocation options or the decision to withdraw, and to give the organization the opportunity to address the reasons leading to that action. Project Leaders should give strong consideration to the loss of business income the organization may incur as a result of the withdrawal and make every possible attempt to remedy the situation.

1.18 What can the Service provide in addition to the use of facilities? In addition to providing Friends with the use of facilities, equipment, and vehicles, the Service may provide:

A. Utilities, such as water, electricity, heat, air conditioning, internet, and phone to the extent that these utilities are available and previously required for the operation of the building and other Government purposes. The Project Leader may require that the Friends organization provide for their own utilities if expenses are above and beyond what is required for Government purposes.

(1) Friends must comply with Homeland Security Presidential Directives (HSPD) that mandate common identification standards for Federal employees, volunteers, Friends, and contractors before they can use Government computers or networks. This means that Friends representatives would need to obtain Federal security clearances, paid for by the requesting office, prior to conducting the work of mutually agreed-upon programs and projects on Service-managed computers or networks.

(2) For conducting the operation and administration of the Friends organization, Friends may use or install, if approved by the Project Leader, an unsecured internet connection. Friends may purchase a separate unsecured line or wireless connection to use as long as they do not connect to the Service's network, and the Friends are using their own computers. Friends must ensure they do not conduct activities in association with lobbying or games of chance on Service-managed property, even if using their own computers (see section 1.12B).

B. Contracted housekeeping and general upkeep (e.g., light bulb replacement, trash removal) to the extent that the Government is already providing these services for the overall operation of the building. Any specialized upkeep needed by the Friends organization that is beyond the general operational expenses of the building is the responsibility of the Friends organization (e.g., specialized light bulbs for a nature store display).

C. General maintenance of Government facilities used by Friends, not including maintenance of Friends-owned property such as, but not limited to, nature store shelving, cash registers, and computers.

1.19 May a Project Leader use Federal funds to support a Friends organization? Yes, subject to availability and using procurement procedures and requirements found in 301 FW 1 through 7, Acquisition Policies and Procedures, the Service may use Federal funds to support the Friends organization only for expenses directly related to the projects and programs that support the Service mission. The Service may not use Federal funds to support a Friends organization's activities or projects related to lobbying, games of chance, fundraising activities, or the operation and administration of a Friends organization, including the purchase of a Friends organization's personal property (see 1.12B, 633 FW 2 and 4).

1.20 May the Service co-sponsor or participate in Friends off-site events? Yes, the Service may co-sponsor and participate in Friends-sponsored events that are not on Service-managed property if:

A. The event is in direct support of the refuge, group of refuges, or Service program(s) that are the subject of the underlying Friends agreement;

B. The event does not include lobbying activities;

**FISH AND WILDLIFE SERVICE
PUBLIC USE MANAGEMENT**

Public Use Management

Part 633 Friends Organizations

Chapter 1 Working with Friends Organizations

633 FW 1

C. The Service and the Friends organization ensure that there is not any express or implied involvement or endorsement of the Service in any solicitation of donations and games of chance activities at the event, and that the event activities do not imply the Service's endorsement of a particular commercial business, brand, product, service, or enterprise; and

D. The Service has ensured that the Friends hold appropriate liability insurance, as determined by a qualified professional, and the Service is held harmless for any liability associated with the off-site event.

/sgd/ Daniel M. Ashe
DIRECTOR

Date: April 4, 2014