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DIRECTOR'S ORDER #21: PHILANTHROPIC PARTNERSHIPS

Approved: _____
Director

Effective Date: _____

Duration: This Order will remain in effect until amended or rescinded

This Director's Order, together with the *Reference Manual to Philanthropic Partnerships*, supersedes and replaces Director's Order #21: Donations and Fundraising, dated July 11, 2008, and any other previous guidance on this topic. The change in title from #21: Donations and Fundraising to #21: Philanthropic Partnerships reflects the evolving nature of this topic and updated terms and practices used by today's growing field of philanthropy and fundraising professionals.

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1 **1. Background and Purpose**

2 **1.1 Background**

3 The National Park Service (NPS) recognizes private philanthropy as both a noble tradition for
4 national parks and a vital element of the success of today's National Park System. A number of
5 national parks exist because motivated citizens contributed time, talent, and funds to create them.
6 Gifts of land or easements have helped establish or enlarge many parks. Donated artifacts enrich
7 park stories in visitor centers and museums across the nation. Philanthropy offers people
8 opportunities to participate actively in the creation and care of their national parks in the 21st
9 century. The NPS continues to embrace philanthropic support in the stewardship of the parks
10 and programs entrusted to our care.¹

11 NPS philanthropic opportunities and partnership practices have continued to evolve over the last
12 decade. As a result, engaging philanthropic organizations and participating in partnerships has
13 become more regulated, complex, and competitive. Therefore, NPS policies and practices for
14 philanthropy must also evolve. To be successful, NPS employees should (1) understand
15 philanthropy today; (2) engage with potential philanthropic partners; (3) practice an impartial
16 and inclusive approach to philanthropy at all giving levels from diverse sources; and (4)
17 recognize all donations, regardless of size.

18 The NPS cannot directly regulate the fundraising activities of private parties with whom it has no
19 formal relationship. However, the NPS may enter into written agreements that authorize others
20 to conduct fundraising on its behalf and, through such agreements, exercise some control over
21 private parties' fundraising activities. All fundraising agreements the NPS enters into must be
22 consistent with the standards in this Director's Order and the Department of the Interior
23 donations policy ([374 DM 6](#)).

24 **1.2 Purpose**

25 The purpose of this Director's Order is to:

- 26 • Set forth the Director's delegation of authority for philanthropic partnerships, including
27 donations, fundraising, and sponsorships;
- 28 • Establish roles and responsibilities for NPS employees who work with donors,
29 philanthropic partners, and potential donors;
- 30 • Establish NPS requirements and standards for expressing support of authorized
31 philanthropic partners under [5 CFR 2635.702\(c\)](#);
- 32 • Establish criteria for reviewing, accepting, and recognizing donations;
- 33 • Identify plans and agreements for philanthropic partnership activities and explain when
34 their use is required;
- 35 • Identify agreements for sponsorship activities and when their use is required;
- 36 • Communicate NPS policies to philanthropic partners and potential donors; and

¹ Philanthropic partnerships are vital to our ability to fulfill our mission: "The National Park Service preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world." [NPS *Management Policies* (2006), inside front cover]

- 37 • Maintain the integrity and impartiality of, and public confidence in, the NPS and the
38 Department of the Interior.

39 This Director’s Order is intended to give the needed framework and flexibility to work with our
40 diverse range of philanthropic partners, including individuals, start-up organizations, and long-
41 established organizations with years of demonstrated success. NPS employees should use this
42 Director’s Order in tandem with the *Reference Manual to Philanthropic Partnerships* (RM-21).

43 **1.3 Related Sources of Guidance**

44 The NPS forms several types of partnerships, beyond philanthropic, to accomplish its mission.
45 Policy guidance for formalizing and managing these relationships are found in:

- 46 • Director’s Order #20: Agreements—establishes NPS policies and procedures for using
47 and administering Cooperative, Interagency, and General Agreements. Friends groups
48 and other partners that are not engaged in philanthropy for the NPS are covered by this
49 Order.
50 • Director’s Order #25: Land Protection—provides guidance for donations of land and
51 interests in land.
52 • Director’s Order #32: Cooperating Associations—provides guidance to NPS managers
53 and staff who work with cooperating associations, the partners that support NPS
54 educational, scientific, historical, and interpretive activities through retail sales.

55 **1.4 Activities not Subject to this Director’s Order**

56 The provisions of this Director’s Order do not apply to:

- 57 a) Services of individual volunteers or groups of volunteers, such as a Girl Scout troop,
58 under the NPS Volunteers-In-Parks program, authorized by the Volunteers in the Parks
59 Act of 1969 (54 USC 102301)²;
60 b) A person’s or an entity’s share of costs where there is independent cost sharing authority,
61 such as challenge cost-share programs where there is no public fundraising for the
62 partner’s cost share;
63 c) Moneys the NPS receives as fees for services;
64 d) Reports or analyses prepared or paid by outside parties, or funds received by the NPS for
65 such purposes, under appropriate authorities, such as a NEPA analysis funded by an
66 applicant, that are not donated as part of a park construction project;
67 e) Donations of official travel expenses covered by 31 USC 1353 for attendance at a
68 meeting or similar function;
69 f) Donations associated with the exercise of NPS regulatory authorities, such as mitigation
70 measures involving the donation of interests in land to be used by the NPS for
71 conservation purposes;
72 g) Gifts to individual employees that are governed by the Government-wide Standards of
73 Ethical Conduct at [5 CFR Part 2635](#);
74 h) Commercial services, including sales of items inside a park, except proceeds from sales
75 items that are part of a cause-related marketing or corporate campaign; and

² Corporate volunteer projects are managed under Director’s Order #7: Volunteers-in-Parks. Donations of supplies and other project materials are treated as in-kind donations, which are discussed in section 5.6 of this Order.

- 76 i) Funds received through agreements where there is an independent statutory authority for
77 acceptance of the funds, such as the Economy Act, the Intergovernmental Cooperation
78 Act, and the Intergovernmental Personnel Act.

79 **2. Authorities**

80 **2.1 Authority for this Director's Order**

81 Authority to issue this Director's Order is contained in the National Park Service Organic Act
82 ([54 USC 100101\(a\) et seq.](#)), and the delegations of authority contained in [Part 245](#) of the
83 Department of the Interior Manual.

84 This Director's Order is intended only to improve the internal management of the NPS, and is
85 not intended to, and does not, create any right or benefit, substantive or procedural, enforceable
86 at law or equity by a party against the United States, its departments, agencies, instrumentalities
87 or entities, its officers or employees, or any other person.

88 **2.2 Authorities for Philanthropy and Partnerships in the NPS**

89 The primary authority to accept donations is found in 54 USC 101101, which expressly
90 authorizes the NPS to accept donations for National Park System purposes. The authority to
91 accept donations of property and money for museum purposes is found in 54 USC 102503.
92 Other authorities may be contained in a park's enabling legislation.

93 Under [43 USC 1473a](#), the NPS may also accept donations from public and private sources and
94 enter into partnership arrangements with Federal, State, or private agencies.

95 Section 3054 of the Carl Levin and Howard P. "Buck" McKeon National Defense Authorization
96 Act for Fiscal Year 2015 (PL 113-291; [128 Stat. 3806](#)) establishes guidelines for the NPS to
97 recognize donations to the NPS or the National Park System.

98 The Department of the Interior donations policy, 374 DM 6, provides the authority and
99 guidelines for determining the acceptability of donations. [The Department of the Interior](#)
100 [Partnership Legal Primer](#) identifies other authorities that permit the NPS to accept donations and
101 recognize donors.

102 **2.3 Congressionally Authorized Fundraising Organizations**

103 Congress chartered the National Park Foundation (NPF) in 1967 as the official nonprofit partner
104 of the NPS. The NPF raises private support for the conservation of natural, scenic, historic,
105 scientific, educational, inspirational, or recreational resources for future generations of Americans.

106 Congress occasionally authorizes nonprofit partners or recognizes the role of an existing
107 nonprofit partner through legislation.

108 Unless specified otherwise, this Order applies to all the Service's dealings with its philanthropic
109 partners, regardless of how they were created.

110 **3. Roles and Responsibilities**

111 The Director sets forth Service-wide policy governing philanthropic partnerships between the
112 NPS and its partners. Park and program managers are responsible for managing and fostering
113 philanthropic partnerships and carrying out the specific requirements for administering these
114 relationships and activities.

115 Other NPS employees may undertake a broad range of appropriate activities related to authorized
116 fundraising by philanthropic partners.

117 **3.1 National Park Service**

118 **3.1.1 Ethical Conduct Requirements**

119 All NPS employees are subject to ethics regulations ([5 CFR 2635](#)), which generally prohibit
120 Federal employees from using their official title, position, or any authority associated with their
121 public office to endorse products, services, or enterprises. However, NPS employees may
122 express support for the authorized fundraising efforts of philanthropic partners that have been
123 identified in a formal agreement with the NPS. See RM-21 for more information on, and
124 examples of, permissible and impermissible uses of title position, and authority.

125 In communications with donors or prospective donors, employees must not portray Congress, the
126 Department, or the NPS as having failed to meet their respective responsibilities. Employees
127 must also comply with [18 USC 1913](#), “Lobbying with Appropriated Moneys,” and other
128 restrictions on lobbying activities.

129 As a matter of policy, NPS employees may not serve as officers—either voting or nonvoting, or
130 as ex-officio board members—of any authorized NPS philanthropic partner or cooperating
131 association that raises funds to benefit the NPS. NPS employees may:

- 132 • Serve as liaisons to authorized philanthropic partners as part of their official duties.
133 Liaisons should consult with an NPS Ethics Officer to ensure compliance with all
134 applicable ethics requirements; and
- 135 • Join or donate to authorized philanthropic partners—consistent with the applicable ethics
136 standards of conduct required of all Federal employees.

137 NPS employees will not accept donations from organizations in which an NPS employee is an
138 officer, director (including ex-officio positions), or has another leadership role, unless the Office
139 of the Solicitor and NPS and Departmental Ethics Officers have reviewed and approved the
140 arrangement in writing in advance.

141 **3.1.2 General Prohibition on Solicitation by Employees**

142 As a matter of policy, NPS employees generally may not solicit donations. This general
143 prohibition does not apply to the Director and Deputy Directors, who may solicit donations,
144 directly or indirectly from private individuals or organizations for the NPS and its programs.

145 The general prohibition on solicitation of donations does not restrict NPS employees from:

- 146 • Responding to public inquiries about donations;
- 147 • Identifying the authorized fundraising efforts of philanthropic partners;

- 148 • Undertaking certain activities related to fundraising by authorized philanthropic partners
- 149 (see section 3.1.3); and
- 150 • Applying for grant programs for which their park or program qualifies.

151 **3.1.3 Authorized Employees**

152 NPS employees who have been delegated the authority to accept donations on behalf of the NPS
153 are designated as “authorized employees.” They must be qualified through training,
154 certification, experience, and organizational responsibility. In general, authorized NPS
155 employees may assist philanthropic partners to achieve fundraising goals.

156 Authorized employees must:

- 157 a) Complete training and certification and maintain competency requirements (see section
- 158 3.1.4);
- 159 b) Comply with the guidelines in this Order and RM-21 whenever a donation is offered or a
- 160 philanthropic agreement is developed (refer to threshold table below);
- 161 c) Gather enough information about a prospective donor or a proposed donation to evaluate
- 162 the donation;
- 163 d) Evaluate the totality of the circumstances, including the donation’s value and purposes
- 164 and the donor’s nature and interests, to determine whether to accept the donation;
- 165 e) Seek guidance from the Assistant Director for Partnerships and Civic Engagement;
- 166 Division Chief, Office of Partnerships and Philanthropy; or a regional partnerships
- 167 coordinator, to resolve any issues associated with accepting a particular donation;
- 168 f) Consider additional concerns raised by donations:
 - 169 • made to a nonprofit entity or philanthropic partner with the intent that the donation
 - 170 will benefit the NPS;
 - 171 • that may reasonably be expected to result in involvement with marketing or advertising;
 - 172 • with conditions;
 - 173 • in which the donor is involved in litigation with the NPS or the Department; or
 - 174 • in which the NPS or another Department bureau regulates the donor.
- 175 g) Respond in a timely manner to all offers of donations, either accepting or declining the
- 176 donation consistent with section 5;
- 177 h) Identify, before entering into a fundraising agreement or before accepting an in-kind or
- 178 conditional donation, any resulting costs and other NPS operational considerations in
- 179 consultation with affected NPS programs;
- 180 i) Develop philanthropic partnership agreements for parks or projects that comply with NPS
- 181 goals, policies, and plans;
- 182 j) Review and approve all informational materials about a proposed donation, proposed
- 183 solicitation, or fundraising campaign before their distribution;
- 184 k) Ensure accountability for donations received by the NPS;
- 185 l) Ensure that fundraising proposed for construction projects also complies with the
- 186 Partnership Construction Process outlined in section 7 and RM-21; and
- 187 m) Recognize donors consistent with guidance in section 8 and RM-21.

188 In addition, authorized employees may:

- 189 a) Identify NPS projects, programs, activities, or objectives suitable for philanthropic support;
- 190 b) Describe NPS needs or how donations will be used to potential donors and the public;

- 191 c) Allow the non-intrusive display and distribution of materials in parks to educate visitors
- 192 about an authorized fundraising campaign or philanthropic activity;
- 193 d) Provide information, where proper, about their ability to accept donations that would
- 194 support their projects and programs;
- 195 e) Serve as a liaison to organizations authorized to fundraise for the benefit of the NPS;
- 196 f) Work with and support an NPS-authorized philanthropic partner to achieve goals
- 197 (including event attendance and accompanying a partner on a donor cultivation visit as a
- 198 subject-matter expert), subject to any specific limitations in this Order;
- 199 g) Work with a philanthropic partner or other non-Federal entities to co-sponsor events;
- 200 h) Accept offers to support park activities through co-sponsorship of events by
- 201 concessioners and others;
- 202 i) Apply, subject to the factors in section 5.2, for competitively awarded grants from
- 203 foundations and for grants or similar assistance from non-Federal government entities;
- 204 j) Encourage the efforts of third parties who wish to create philanthropic support groups
- 205 whose purposes include fundraising for the benefit of the NPS; and
- 206 k) Work with nonprofit organizations and others to receive donations of non-real property,
- 207 including cash and in-kind goods and services.

208 The table below shows who may accept donations and sign philanthropic agreements at specific
 209 value thresholds.

Delegations of Authority and Thresholds for Donation Acceptance and Agreements Approval for Fundraising, Capital Campaigns, and Partnership Construction*		
Authorized Employee	Base Thresholds**	Thresholds with Certification and Training***
Director/Deputy Directors	Over \$1 million	Over \$5 million may be delegated by the Director
Associate/Assistant Directors/CFO	Less than \$1 million	Up to \$5 million may be delegated by the Director
Assistant Director of Partnerships and Civic Engagement	\$250,000 or more	Up to \$5 million may be delegated by the Director
Regional Directors (RD)	Less than \$1 million	Up to \$5 million may be delegated by the Director
WASO Division Chief, Office of Partnerships and Philanthropy	N/A	Up to \$1 million may be delegated by Assistant Director, Partnerships and Civic Engagement
Superintendents	\$100,000 or less	Up to \$5 million may be delegated by regional director based on superintendent's grade level, size of park budget, and philanthropic experience
*The NPS Development Advisory Board (DAB) must approve <u>all</u> partnership construction projects over \$500,000; these thresholds apply to all fundraising for partnership construction projects. **The Base Thresholds levels are derived from the levels set in Director's Order #21 (2008). ***Authorized employees must meet the training and certification requirements to obtain the delegated authority for these threshold levels. Delegation is tied to the specific individual in a position and does not automatically transfer to the next person assigned to a superintendency or when a superintendent moves to another region.		

210 **3.1.4 Philanthropic Competencies and Skills**

211 NPS and partner professionals with responsibilities in philanthropic partnership initiatives must
 212 have core competencies and skills to undertake and manage successful philanthropic
 213 partnerships. Authorized NPS employees will be required to complete a training certification
 214 program to develop the knowledge base and skills for success in philanthropy and partnerships.

215 The training and certification program will also be available to key partner staff. A training
216 program that involves NPS employees and our partners will create a community of practice and
217 shared understanding, bringing the NPS and its partners closer together. This deeper
218 understanding of each other’s organizational and ethical “cultures” will enable all parties to work
219 in closer alignment to achieve shared goals in a single community of practice.

220 **3.1.5 Director and Deputy Directors**

221 The Director or a Deputy Director must approve philanthropic agreements for philanthropic
222 activities that will benefit the NPS if the activities:

- 223 • Have a goal valued at over \$5 million;
- 224 • Involve high profile national or international donations or solicitations;
- 225 • Involve construction projects where the total costs are estimated to exceed \$5 million; or
- 226 • Involve corporate campaigns of national or international significance.

227 The Director or Deputy Directors will ensure that authorized employees under their direct
228 supervision complete the required philanthropic competencies training and certification
229 described in section 3.1.4.

230 See RM-21 for the requirements for philanthropic agreements that must be submitted to the
231 Director for approval.

232 **3.1.6 Assistant Director, Partnerships and Civic Engagement**

233 The Departmental Manual requires each bureau to designate a Senior Manager to be responsible
234 for donation-related activities (374 DM 6.7C). The Assistant Director, Partnerships and Civic
235 Engagement (Assistant Director) is designated as the NPS Senior Manager and is delegated the
236 authority to implement and oversee this Director’s Order and will:

- 237 • Establish and implement the policies, procedures, and standards specified in this Order;
- 238 • Issue, review, and revise as appropriate, a reference manual (RM-21) with detailed
239 procedures for managing NPS philanthropic partnerships and donation acceptance
240 activities;
- 241 • Encourage park philanthropy and provide the necessary guidance, advice, and
242 consultation to ensure the proper and effective use of NPS donation acceptance
243 authorities;
- 244 • Coordinate with NPS or Departmental ethics personnel, the Assistant Secretary for
245 Policy, Management and Budget, or the Office of the Solicitor, to resolve issues
246 associated with a donation if the circumstances are unclear or questionable;
- 247 • Make the final determination for all donations of \$250,000 or more;
- 248 • Make the final determination for donations of any dollar amount with conditions that may
249 have significant implications for the NPS budget or programs;
- 250 • Coordinate with other bureaus to obtain their review of proposed donations of \$1 million
251 or more;
- 252 • Serve as the NPS contact for review of other bureaus’ proposed donations of \$1 million
253 or more;
- 254 • Approve any donation offered to the NPS by a donor involved in litigation with the
255 Department or any of its bureaus; and
- 256 • Manage the Service’s day-to-day relationship with the National Park Foundation.

257 **3.1.7 WASO Division Chief, Office of Partnerships and Philanthropy**

258 Unless specified elsewhere in this Director’s Order, the Division Chief, Office of Partnerships
259 and Philanthropy³ is delegated by the Assistant Director the day-to-day responsibility for
260 implementation of the policies and guidance, and maintaining the standards in this Director’s
261 Order. The Division Chief will:

- 262 • Coordinate partnerships that are national in scope, or involve parks or programs in more
263 than one region;
- 264 • Direct and support a national philanthropic partnerships training and development
265 program to certify authorized employees to solicit and accept donations and approve
266 agreements at designated threshold levels;
- 267 • Develop and maintain a roster of NPS authorized employees and their training
268 certifications;
- 269 • Develop and maintain a database on park and program partnerships and philanthropy;
- 270 • Review and refer to the Director for acceptance the following potential donations:
 - 271 ○ single donations or phased donations (pledges paid in installments by the same donor)
 - 272 with a value over \$5 million;
 - 273 ○ donations that raise significant concerns based on the criteria identified in section 5;
 - 274 and
 - 275 ○ corporate donations that are tied to national or international marketing promotions.
- 276 • Provide donor-review(vetting) services to NPS authorized employees for all donations
277 over \$250,000; and
- 278 • Coordinate with the Office of Solicitor, and NPS or other Departmental officials, as
279 necessary.

280 **3.1.8 Associate and Assistant Directors**

281 Associate and assistant directors are delegated the authority to accept donations and approve
282 fundraising agreements for programs under their oversight according to the values in the
283 Delegations of Authority and Thresholds table in section 3.1.3.

284 Associate and assistant directors will:

- 285 • Coordinate with the WASO Office of Partnerships and Philanthropy about prospective
286 donations or philanthropic partnerships for their program areas; and
- 287 • Identify program office staff to serve on the NPS Partnership Council.

288 **3.1.9 NPS Chief Financial Officer**

289 The Chief Financial Officer will issue documentation, accounting, and internal control
290 procedures for donation activities under applicable statutes, regulations, and policies, including
291 the Federal Records Act, the Paperwork Reduction Act, the Privacy Act, [Office of Management](#)
292 [and Budget \(OMB\) Circular A-123](#), and [Director’s Order #11D: Records and Electronic](#)
293 [Information Management](#). Documentation will allow for NPS reviews or audits, and audits or
294 investigations by the Office of Inspector General or the Government Accountability Office.
295 These procedures will:

³ Previously named the “Office of Partnerships and Philanthropic Stewardship,” the name “Office of Partnerships and Philanthropy” reflects the program’s present direction and responsibilities.

- 296 • Document the receipt and disposition of all personal property, regardless of the method or
297 source of acquisition, following Director’s Order and Handbook #44: Personal Property
298 Management, and Departmental policies and directives for property management ([410](#)
299 [DM](#), [IPMD 114-60.5](#)), and for museum property ([411 DM](#));
- 300 • Establish distinct accounting elements to comply with donor requirements for conditional
301 donations;
- 302 • Account for all monetary donations in the NPS financial system at a level that will allow
303 accountability for individual donations; and
- 304 • Establish internal controls that meet OMB, Departmental, and NPS requirements.

305 **3.1.10 Regional Directors**

306 Regional directors are responsible for policy oversight, direction, and technical support for park
307 and program partnerships and philanthropic activities within their regions.

308 Regional directors will:

- 309 • Encourage park and program partnerships and philanthropy at a regional level;
- 310 • Coordinate partnerships that involve multiple parks or programs in one region;
- 311 • Ensure that authorized employees under their supervision complete the required
312 philanthropic competencies training and certification described in section 3.1.4;
- 313 • Vet proposed donations over \$50,000 and up to \$250,000;
- 314 • Submit proposed donations over \$250,000 to the WASO Partnerships and Philanthropy
315 Office for vetting and to the Assistant Director, Partnerships and Civic Engagement for
316 determination before acceptance;
- 317 • Identify regional office and park staff to serve on the NPS Partnership Council; and
- 318 • Designate a regional partnerships coordinator to service the parks and programs within
319 the region.

320 Regional directors are delegated the authority to:

- 321 • Accept donations and approve fundraising agreements according to the values in the
322 Delegations of Authority and Thresholds table in section 3.1.3; and
- 323 • Delegate authority to a superintendent, based upon his or her grade level, experience with
324 philanthropy, and size of park budget, to accept donations and approve fundraising
325 agreements where the threshold value is \$5 million or less. Superintendents must
326 complete the philanthropy and partnerships training and certification course.

327 **3.1.11 Superintendents**

328 Superintendents will:

- 329 • As delegated by the regional director, serve as the authorized employees for their
330 respective areas to accept donations and approve agreements at threshold levels based on
331 completion of required training, grade level, size of park budget, and philanthropic
332 experience;
- 333 • Develop an annual work plan with the philanthropic partner based on the identified needs
334 of the park and program areas. The work plan will guide the philanthropic goals and
335 objectives.
- 336 • Submit proposed donations over \$50,000 to the regional director for vetting before
337 acceptance;

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- Submit proposed donations over \$250,000 to the WASO Partnerships and Philanthropy Office for vetting and to the Assistant Director, Partnerships and Civic Engagement for determination before acceptance; and
 - Coordinate philanthropic partnerships for their respective areas. A superintendent who manages multiple parks will coordinate any partnership that involves one or more of those sites.

344 Although NPS employees may not solicit donations, superintendents are encouraged to
345 participate with philanthropic partners in “donor cultivation” meetings with prospective donors.
346 In these situations, superintendents serve as the NPS subject-matter experts and may provide
347 helpful context and content as the partner solicits donations.

348 **3.1.12 NPS Partnership Council**

349 The NPS has established the NPS Partnership Council (Council) to provide leadership to the
350 NPS and its partners. The Council’s purpose is to:

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- Advise and make recommendations about partnerships issues to the Assistant Director, Partnerships and Civic Engagement;
 - Expand NPS capacity to foster, manage, and sustain partnerships;
 - Enhance the quality of existing partnerships; and
 - Support partnership programs and activities to serve as models for Federal-sector partnerships.

357 Council membership consists of 12 voting members, representing the NPS associate and
358 assistant directors, regional directors, regional partnership coordinators, park superintendents,
359 and the Chief, Office of Philanthropy and Partnerships. The Council will also include a non-
360 voting liaison from the National Park Foundation. The Council may invite subject-matter
361 experts from outside the NPS to educate members on specific issues.

362 **3.1.13 Office of the Solicitor**

363 The Department of the Interior Office of the Solicitor is to review any agreements with
364 provisions that alter approved agreement templates to ensure that the agreements are legally
365 sufficient.

366 **3.2 Philanthropic Partners**

367 Philanthropic partners refers to any entity—including non-public entities (such as nonprofit
368 organizations and friends groups), for-profit corporations, fundraising networks, crowdfunding
369 organizations, and individuals—that has an agreement to fundraise or otherwise generate
370 donations, on behalf of the NPS.

371 NPS philanthropic partners must:

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- Ensure that fundraising and other philanthropic activities follow approved agreements and work plans (see section 6.2); and
 - Work with the park or NPS program to develop and implement a donor recognition plan consistent with section 8 of this Order and the corresponding section in RM-21.

376

377 Philanthropic partners should:

- 378 • Develop an annual work plan with the park superintendent based on the identified needs
379 of the park and program areas. The work plan will guide the philanthropic goals and
380 objectives.
- 381 • Work with a national park or NPS program to engage the public in philanthropy;
- 382 • Obtain accredited philanthropic competency training and certification program;
- 383 • Describe NPS-identified needs to potential donors and the public;
- 384 • Raise, hold, and manage an endowment or investment account for the benefit of park
385 projects and NPS programs, consistent with terms in philanthropic partnership
386 agreements; and
- 387 • Work with the NPS in the review of proposed donations, consistent with the donation
388 review process outlined section 5 of this Order.

389 Congressionally authorized partners may have specific responsibilities that are defined in the
390 legislation. Park and program managers must be knowledgeable about these specific
391 responsibilities.

392 **3.3 Cooperating Associations**

393 Cooperating associations (under Director's Order #32), may accept donations on behalf of the
394 NPS when appropriate and when conducted through authorized fundraising efforts. The
395 Strategic Fundraising Agreement, described in section 6, is the tool used to authorize this
396 activity. See RM-21 for more information.

397 **4. Philanthropic Support**

398 The NPS may accept, use, and recognize donations (gifts) of various kinds to support and
399 promote our mission, consistent with applicable laws and the Department of the Interior
400 donations policy (374 DM 6).

401 Donations may come to the NPS as single expressions of support, or in response to an organized
402 fundraising campaign. A donation may be offered directly to a park or program, or indirectly to
403 a partner for the benefit of a park or program. Donations, be they cash or in-kind goods and
404 services, are used to enhance NPS programs and to help achieve excellence.

405 This section highlights options for philanthropic support and tools available to the NPS and our
406 partners. The NPS will evaluate new philanthropic options and tools and adopt those that help us
407 to meet philanthropic goals and objectives. All donations are subject to the donor evaluation and
408 review (vetting) guidelines in section 5.

409 RM-21 contains more guidance; sections will be updated as needed, to ensure that we and our
410 partners understand evolving trends in fundraising and use best practices to achieve philanthropic
411 goals, maintain transparency, and ensure accountability.

412 **4.1 Types of Support Accepted by the NPS**

413 The NPS accepts gifts and philanthropic support from many sources—from individuals, for-
414 profit corporations, nonprofit organizations, and public agencies with tax-exempt status.

415 Acceptable gifts and forms of support include:

- 416 • Cash for either restricted or unrestricted purposes
- 417 • Tangible personal property
- 418 • Securities (such as, common stocks, preferred stocks, and bonds)
- 419 • Real estate (land and improvements), or interests in real property (easements)
- 420 • Museum collections
- 421 • Intellectual property (for example, works of art)
- 422 • Planned and phased giving (estate planning, bequests, charitable gift annuities, charitable
423 trusts, and retirement plan or life insurance beneficiary designations)
- 424 • In-kind (such as, goods, services, volunteer time, and expertise)

425 Parks, NPS programs, and 501(c)3 philanthropic partners can offer donors a tax deduction to the
426 full extent of the law (see [IRS Publication 1717: Charitable Giving](#)). Regardless of the type or
427 amount of the donation, the NPS or the authorized NPS philanthropic partner must substantiate
428 the contribution with a bank record or a written communication that shows the name of the
429 charitable party, the date of the contribution, and the amount.

430 **4.2 Use of Donations**

431 Donations may be used to fund or otherwise support any NPS activity for which appropriated
432 funds could be used, subject to the following:

- 433 a) Donations for employee salaries are to be made only to the NPS directly (not to the
434 employee) and only to fund the salaries of:
 - 435 • Term or temporary NPS employees;
 - 436 • Permanent NPS employees who are directly engaged in a capital improvement project
437 that is funded with donations; and
 - 438 • Other permanent NPS employees funded through an NPS-approved endowment from
439 which the payment of salaries is a stated purpose.
- 440 b) Donations made directly to the NPS or an authorized philanthropic partner will not be
441 used to begin construction, or a phase of construction, or other projects or programs,
442 unless there are enough funds in hand to ensure completion of the work to a degree that
443 has independent utility. Donated funds may also be used to advance project design work.
- 444 c) Donated funds or services, or both, may pay for (or offset) NPS-conducted or authorized
445 plans or studies if standard planning or study procedures, partnership construction process
446 requirements (see section 7), and other applicable policies are followed. Research projects,
447 books, mapping, exhibits, films, and other projects funded with donations must receive the
448 same reviews and approvals as projects that use appropriated funds.

449 **4.3 Fundraising Campaigns**

450 All NPS-authorized fundraising campaigns must:

- 451 a) Generate a clear benefit for the NPS and be consistent with NPS purpose, mission, and
452 goals, and applicable laws, regulations and policies;
- 453 b) Be conducted with high standards that maintain the integrity of the NPS and its partners:

- 454 • fundraising campaigns that identify the NPS with tobacco and any type of illegal
455 product will not be authorized;
- 456 • associated marketing or advertising activities may not state or imply NPS
457 endorsement of any business, product, service or enterprise;
- 458 • marketing, donor recognition, or brand/product promotion activities must take special
459 care to ensure that national parks and NPS programs are not commercialized; and
- 460 • the NPS will not allow any advertisement that promotes a corporate brand, service,
461 product, or enterprise to use the NPS arrowhead symbol, an NPS employee, any part
462 of the NPS uniform, or other elements of NPS intellectual property.
- 463 c) Have a written agreement executed between the NPS, and a philanthropic partner before
464 fundraising campaign activities begin:
- 465 • for agreements authorizing fundraising campaigns for \$1 million or above, the
466 regional partnership coordinator will provide the Division Chief, Office of
467 Partnerships and Philanthropy a briefing statement and copy of the draft agreement
468 before approval of the campaign; and
- 469 • the Director or a Deputy Director must approve all campaigns having a goal over \$5
470 million.
- 471 d) Have NPS review and approval of campaign-related informational materials before
472 distribution.

473 See section 3 of this Order for guidance on approval thresholds.

474 **4.4 Corporate Partnerships**

475 Public-private partnerships, with for-profit and nonprofit corporations, play a key role in
476 supporting the NPS mission. They may include monetary, non-monetary, marketing, and other
477 forms of support for NPS activities. Official partnerships can also help the NPS build
478 constituencies, promote stewardship, and increase awareness through public engagement. The
479 value and potential of all corporate partnerships must be consistent with the mission and purpose
480 of the NPS, and be officially recognized through a philanthropic or strategic partnership
481 agreement.

482 **4.4.1 Cause-Related Marketing**

483 The NPS engages in cause-related marketing in partnership with philanthropic partners or
484 directly with for-profit and nonprofit corporations to generate awareness and funds. One goal of
485 a cause-related marketing campaign is to co-brand with a corporation. A cause-related
486 marketing campaign should be undertaken only when the relationship strengthens the assets and
487 brands of both the NPS and the corporation involved. The co-branding opportunity can lead to
488 public and employee engagement that achieves a purpose, inspires passion, and generates profits.

489 Cause-related marketing campaigns that involve parks or programs within one region will be
490 designed and reviewed through that regional office. The Office of Partnerships and Philanthropy
491 will review any cause-related marketing campaign with a goal over \$250,000. Campaigns that
492 involve parks or programs in more than one region will be designed and vetted through the
493 Office of Partnerships and Philanthropy. Authorized fundraising partners may engage in cause-
494 related marketing campaigns through the same approval process. The Office of Partnerships and
495 Philanthropy must approve the use of any NPS mark or logo.

496 **4.4.2 Corporate Social Responsibility**

497 A growing number of companies have made corporate social responsibility (CSR) a core
498 business practice, promoting social, environmental, and economic sustainability (people, planet,
499 and profit, the “three pillars of sustainability”). The NPS is a potential partner for companies
500 with a commitment to CSR who are willing to provide financial and in-kind support for NPS
501 projects, programs, and other activities. By engaging with corporations through their CSR
502 programs, the NPS can educate corporate leaders and employees about the National Park System
503 and NPS programs, and establish long-term, sustainable partnerships. Corporate engagement
504 could lead to employee volunteer service days, donations to NPS initiatives through financial
505 contributions, employee donation matching programs, and pro bono expertise.

506 A formal relationship with a corporation must be formed through an agreement to define the
507 roles and responsibilities of both parties. Once a CSR program has been activated with a park,
508 program, or an authorized philanthropic partner, the corporation will typically make it part of
509 their annual budget and work plan. Superintendents or program managers should follow their
510 donor recognition plan to recognize corporate CSR contributions.

511 **4.5 Volunteers and In-Kind Donations**

512 Volunteers are vital to the mission of the NPS and are invaluable to building strong partnerships.
513 Every year more than 250,000 volunteers donate over 6 million hours of service to help the NPS
514 preserve and protect America’s natural and cultural heritage.

515 Volunteer activities also help the NPS and our partners build and strengthen existing and new
516 constituencies. Engaging potential donors as volunteers in park activities or through our
517 programs increases their appreciation for, and support of, national parks, programs, and activities.

518 The in-kind donation of professional time and expertise is a form of volunteerism. The national
519 parks and NPS programs have benefited from the professional expertise of educators, scientists,
520 engineers, lawyers, architects, mechanics, information technology specialists, historians, and
521 researchers. See Director’s Order and RM #7: Volunteers-in-Parks for guidance and agreement
522 forms for volunteer activities.

523 **4.6 In-Park Fundraising**

524 As people become engaged in the work of the NPS and its philanthropic partners, they often
525 express an interest in supporting projects, programs, and activities. The NPS can offer
526 opportunities for people to make donations through park websites, in-park donation boxes, and
527 through the Checkout Counter Donation Program (see section 4.6.2). Without personally
528 soliciting donations, NPS employees may, when asked, offer information about NPS and park
529 needs, as well as, discuss the opportunity to support the park through donating to the authorized
530 fundraising partner.

531 Unless visitors have given specific permission (such as through an opt-in check box), the NPS
532 may not give park partners or another third party any visitor names from permit applications,
533 backcountry or campground registrations, or other sources, except as allowed under the Freedom
534 of Information Act and the Privacy Act.

535 **4.6.1 In-Park Fundraising by Partners**

536 In-park fundraising efforts by an authorized philanthropic partner serve the NPS and the partner
537 by:

- 538 • Demonstrating the relationship between the NPS and the partner;
- 539 • Enhancing the public's perception of the role of the partner; and
- 540 • Communicating to the public that authorized fundraising activities directly benefit a park.

541 An authorized philanthropic partner may conduct fundraising activities or donor cultivation
542 events, and solicit or accept donations on park property when:

- 543 • The activity or event is identified in an agreement or annual work plan approved by both
544 the superintendent and the partner;
- 545 • The superintendent has issued a special park use permit following the applicable
546 regulations and policy guidance in [36 CFR 2.50](#), [36 CFR 2.51](#), [36 CFR 2.52](#), [36 CFR](#)
547 [7.96](#), and Director's Order and RM #53: Special Park Uses;
- 548 • Donations collected directly support a park initiative, asset, or program; and
- 549 • The NPS and the partner have decided how their respective costs and fees for managing
550 and monitoring each event will be covered.

551 Park superintendents may permit cooperating associations to collect donations in park bookstores
552 following the same rules and policies as authorized philanthropic partners.

553 See RM-21 for more information.

554 **4.6.2 Donation Boxes**

555 Donation boxes may be installed on park property either by the NPS or by an authorized
556 philanthropic partner if 100% of the donations or collections will benefit the park. Special
557 attention must be paid to the internal control procedures in RM-21 for handling and depositing
558 the funds.

559 NPS donation boxes may be placed only on NPS property, or on property jointly administered by
560 or for the benefit of the NPS. The accounting procedures for funds received from NPS donation
561 boxes on jointly administered property (joint visitor centers, heritage areas, or leased facilities
562 outside of parks) are the same as those on NPS-controlled property. The proceeds from joint
563 donation boxes will be allocated based on a formula agreed to by the entities in a written
564 agreement.

565 Through a written agreement, the NPS may permit the placement of an authorized philanthropic
566 partner's donation box in a park. The agreement will include all necessary internal control
567 measures. Such donation boxes may recognize the partner's role in maintaining the box under its
568 agreement.

569 Donation boxes must clearly inform the public how the NPS or its partners will use the money.
570 Without this information, moneys collected in a donation box must be considered miscellaneous
571 receipts and deposited to the U.S. Treasury.

572 **4.6.3 Checkout Counter Donation Program**

573 The original Checkout Counter Donation Program (formerly the Guest Donation Program)
574 authorized lodging concessioners to offer guests the opportunity to donate one dollar, or more,
575 per day through the National Park Foundation (NPF) to support the national park they were
576 visiting. Since it began, the program has expanded to include non-lodging activities. Donation
577 checkout campaigns at a lodge, gift shop, or bookstore register give visitors a convenient way to
578 support park programs or projects.

579 Through agreements with the NPF, concessioners and cooperating associations may offer
580 checkout opportunities for visitors to make donations to support park projects or programs. Such
581 authorization requires the funds be sent to the NPF for disbursement to an authorized
582 philanthropic partner, cooperating association, or directly to the park. This process is the only
583 way to authorize a checkout program. Older practices will not be grandfathered.
584 Superintendents must use their best judgment to determine the amount and distribution of
585 checkout counter donation opportunities across the parks.

586 The Secretary of the Interior has authorized the NPF to manage checkout counter donation funds
587 under its policies for restricted funds. The NPF may recover administrative costs for this
588 activity. See the Secretary of the Interior’s memo of October 1, 2003 and the Director’s memo
589 of October 6, 2003 in RM-21.

590 **4.7 Electronic Donations and Emerging Practices**

591 Recent philanthropic trends in electronic, online, and mobile giving offer expanded opportunities
592 to support the NPS. Many of these new methods mimic traditional donation boxes, but are
593 online. Park superintendents should encourage online giving to their philanthropic partner and
594 may accept direct donations via their parks’ websites. Parks with direct online donation
595 capabilities can place notices to inform the public about these donation opportunities.
596 Procedures for setting up and operating online direct donation collections are in RM-21.

597 Authorized philanthropic partners may fundraise through direct mobile giving or through a third-
598 party vendor. This type of fundraising may involve administrative overhead for associated
599 expenses. Partners may use some of the funds collected from mobile giving to cover
600 administrative costs. Partners must include the details of how electronic giving methods will be
601 used in their approved annual work plans.

602 NPS.gov websites may also link to the websites of authorized fundraising partners that are able
603 to accept electronic donations. Such links must conform to NPS and Departmental policies for
604 digital governance, management, and security. See Director’s Order #70: Digital Governance
605 and Management.

606 **4.7.1 Crowdfunding**

607 Crowdfunding has become a popular way to seek donations for a project, often via the Internet.
608 Following the guidelines in this Order, authorized philanthropic partners may consider the use of
609 crowdfunding in a fundraising effort. Partners may use an approved portion of the funds
610 collected from crowdfunding to cover any administrative costs, under the terms of an approved
611 Philanthropic Partnership, Strategic Fundraising, or Sponsorship agreement (see section 6.2).

612 **4.8 Accountability and Recordkeeping Requirements for Donations**

613 All monetary donations received directly by the NPS must be deposited in a donation account⁴,
614 be accounted for, and be disbursed using the same standards and procedures used for
615 appropriated funds. All non-monetary donations accepted by a park or program must be
616 accounted for under the same standards and procedures used to account for other similar
617 government property (see Director’s Order #44: Personal Property Management, Director’s
618 Order #25: Land Acquisition, and Director’s Order #24: NPS Museum Collections
619 Management). The donor is responsible for establishing the value of the item for purposes of
620 Federal and state tax laws; the NPS does not give tax advice. Accountability and recordkeeping
621 procedures and forms are found in RM-21.

622 **5. Donor Review**

623 The NPS will review (vet) all proposed donations or gifts, and their circumstances, before
624 acceptance. The information discovered is used to make informed decisions about whether to
625 accept them or not. All donations are vetted to:

- 626 • Ensure that any conditions or restrictions on the donations are consistent with the NPS
627 mission and values;
- 628 • Avoid conflicts of interest;
- 629 • Maintain NPS and Department impartiality;
- 630 • Maintain public confidence in the NPS and the Department;
- 631 • Protect brand integrity, including the use of NPS marks;
- 632 • Consider the cumulative effects of any donations that occur across multiple regions or
633 parks; and
- 634 • Prevent financial liability.

635 **5.1 Acceptance Considerations**

636 **The NPS generally will not accept a donation that imposes, or purports to impose, any**
637 **long-term conditions or obligations on the NPS.****5.1.1 Prohibited Sources**

638 NPS policy is to decline direct donations from:

- 639 • Concessioners and holders of commercial use authorizations (CUA) or those seeking a
640 concessions contract or CUA (this does not prohibit an authorized philanthropic partner
641 from accepting donations from these sources for NPS projects);
- 642 • Sources that would identify the NPS with tobacco or any type of illegal products;
- 643 • Sources that would generate controversy or associate the NPS with products that are
644 inconsistent with our mission, or require activities that circumvent Federal regulations or
645 ethics rules; or
- 646 • Donors involved in litigation with the Department or its bureaus, except under
647 circumstances described in section 5.5.

648 After the effective date of this Order and under its provisions and standards, the NPS will
649 permit—after thorough review—philanthropic partnerships with, and accept donations from,
650 corporations that produce or distribute alcohol.

⁴ The Consolidated Appropriations Act, 2016 (PL 114-113) authorizes the NPS to deposit monetary donations (classified as “trust funds” under 31 USC 1321(a)(17)-(18) in interest-bearing U.S. Treasury investments.

651 **5.2 Evaluation Factors**

652 NPS authorized employees must consider all relevant or prescribed factors when determining
653 whether to accept or decline a donation, including the value and purposes of the donation and the
654 nature and interests of the donor. The authorized employee should weigh the totality of the
655 circumstances from the perspective of a reasonable person with knowledge of the relevant facts.

656 The following list illustrates what authorized employees should consider when evaluating the
657 circumstances and making donation-related decisions. It is neither exclusive, nor does it imply
658 that any one of these factors absolutely requires the NPS to accept or decline a donation. See
659 also, 374 DM 6.6 and 6.10C.

660 **5.2.1 Integrity**

661 Maintains the integrity of the NPS and the Department's programs and operations:

- 662 a) The donation does not, or does not appear to be (such as by its size or circumstances), an
663 attempt to influence the exercise of any NPS or Departmental regulatory or other
664 authority.
- 665 b) The donation meets a legitimate NPS need and does not require the commitment of
666 funding that is not planned or available.
- 667 c) The donation is consistent with and does not otherwise circumvent law, regulation, or
668 policy.
- 669 d) Any conditions or restrictions on the donation are consistent with policy, authorized
670 purposes, or applicable plans.
- 671 e) The NPS is able to properly and effectively use and manage any donated real or personal
672 property consistent with policy, programmatic, and management goals.
- 673 f) The donor will not use the donation to state or imply NPS endorsement of the donor or
674 the donor's product or services.
- 675 g) The donation, if it involves temporary or term personnel or provides funding to hire
676 temporary or term personnel, is structured in such a manner that these personnel do not
677 inappropriately influence any regulatory actions or other significant decisions.

678 **5.2.2 Impartiality and the Appearance of Impartiality**

679 Maintains the impartiality, and the appearance of impartiality, of the NPS, the Department, and
680 their employees:

- 681 a) The proposed donation is made to a park or program, or made in an amount that would
682 not influence or appear to influence any significant pending NPS or Departmental
683 decision or action involving the donor's interests.
- 684 b) There is neither an actual nor an implied commitment to take an action favorable to the
685 donor in exchange for the donation.
- 686 c) The donor will not obtain or appear to obtain special treatment in dealing with the NPS,
687 the Department, or any of its other bureaus.

688

689 **5.2.3 Public Confidence**

690 Maintains public confidence in the NPS, the Department, and their programs and employees:

- 691 a) Acceptance would not likely result in public controversy.

- 692 b) The donation comes only with conditions that are consistent with NPS program and
- 693 policy goals.
- 694 c) The donation consists of only goods or services needed by the NPS.

695 **5.3 Process for Vetting Direct Donations**

696 The purpose of the vetting process is to provide information and a recommendation to an NPS
697 authorized employee to (1) accept a donation, (2) decline a donation, or (3) defer acceptance
698 until certain conditions are met. The final decision to accept or decline a donation rests with the
699 NPS authorized employee.

700 The NPS will evaluate a prospective donor every fiscal year that the donor offers a donation
701 (unless the donor's total fiscal year donation triggers a higher evaluation requirement; see 374
702 DM 6.10 and section 3.1.6 of this Order). This applies to both one-time and phased donations
703 made over one or more fiscal years. The authorized employee should evaluate the circumstances
704 surrounding a multi-year project or donation and accept or deny it following the procedures in
705 this section. The authorized employee will identify what information is necessary to evaluate the
706 circumstances of a donation and should re-evaluate any prospective donor whose information has
707 significantly changed. If an authorized employee has any reason to believe that a donor was, or
708 will be, the subject of a Departmental or Office of Inspector General (OIG) investigation, he or
709 she should refer the proposed donation to the Office of Partnerships and Philanthropy. This
710 office will coordinate with the OIG or the appropriate investigating office to obtain information.

711 **5.3.1 Donations that are Not Land or Interests in Land**

- 712 a) For donations valued at \$25,000 or more, the donor will be asked to provide information,
713 per the Departmental Manual (374 DM 6.10), using DI 3680, Donor Certification Form.
- 714 b) Donations over \$250,000 will be referred to the Office of Partnerships and Philanthropy
715 to be vetted. The Office of Partnerships and Philanthropy will coordinate with the proper
716 NPS program areas and the Solicitor's Office for a search of their record systems. The
717 donation may also be referred to the OIG to obtain information from its systems or public
718 databases for prior dealings and adjudications.
- 719 c) The NPS senior manager will refer any proposed donation valued at \$1 million or more
720 to the senior managers responsible for donations in other bureaus to identify any concerns
721 about the donation.

722 **5.3.2 Donations of Land or Interests in Land**

723 NPS field or regional lands/realty offices will review donations of land or interests in land
724 following the processes and requirements specified in Director's Order #25: Land Protection.

725 **5.3.3 Exceptions**

726 The following types of donations are not subject to the donor vetting process; however, they will
727 be evaluated using the acceptance considerations and factors listed in sections 5.1 and 5.2:

- 728 a) Donations (or grants) from Federal, state, and local governments;
- 729 b) Donations from accredited educational institutions; and
- 730 c) Donations offered during and related to (declared) natural and other emergencies.

731 **5.4 Review of Contributions to Partners**

732 Philanthropic partners engaged in fundraising to benefit the NPS are required to review donors.
733 Most nonprofit partners have their own professional standards for vetting and accepting
734 donations. The philanthropic partner’s donor review process and specific thresholds must be set
735 out in the philanthropic agreement between the NPS and the partner.

736 Donors often contribute directly to a nonprofit partner of the NPS with the partner subsequently
737 making the donation to the NPS—an indirect donation. Partners must be aware that
738 Departmental and NPS policies govern the vetting of donations made directly and indirectly to
739 the NPS.

740 Donations made to a philanthropic partner to support their administrative and operational costs
741 are not subject to NPS donor review policies.

742 **5.5 Acceptance of Donations from Donors Involved in Litigation**

743 To avoid any appearance that a donation is intended to influence the handling or outcome of
744 legal disputes or litigation, the NPS will normally decline a gift from a donor involved in
745 litigation with the Department or its bureaus. In some cases, however, the context of the
746 proposed donation may be sufficiently removed from the litigation that it will not appear to be an
747 attempt to influence the litigation. For example, a donor may propose a donation to the NPS that
748 is unrelated to litigation with another bureau, or the amount of the donation does not suggest any
749 intent to influence the handling of the litigation. The procedures for the review and approval of
750 such donations are in RM-21.

751 **6. Public-Private Partnerships**

752 To enhance its management of the National Park System and NPS programs, the NPS
753 increasingly relies on vibrant philanthropic relationships with the private sector. Some of those
754 relationships are long-term, built over many years; others are short-term arrangements that focus
755 on a specific project or program need.

756 **6.1 Philanthropic Partners**

757 Philanthropic partners refers to any entity—including non-public entities (such as nonprofit
758 organizations and friends groups), for-profit corporations, fundraising networks, crowdfunding
759 organizations, and individuals—that has an agreement to fundraise or otherwise generate
760 donations, on behalf of the NPS. There are three types of authorized philanthropic partners:

- 761 • Congressionally Authorized Partners—includes the National Park Foundation and any
762 other entity that Congress has or may authorize to offer philanthropic support to the NPS.
- 763 • Philanthropic Partners—an authorized fundraising partner that has cultivated a long-term,
764 ongoing relationship with a national park or NPS program, and whose primary mission is
765 to raise funds to support that park or program. The NPS has identified three levels of
766 philanthropic partnerships based upon length of service and support to a park or program
767 (see section 6.2). This category includes the organizations known as “Friends Groups.”
- 768 • Strategic Philanthropic Partners—these are organizations (national, regional, and local)
769 or individuals whose primary relationship to the NPS is not philanthropic, but who may
770 wish to assist the NPS with short-term philanthropic projects or needs. These partners

771 support the NPS mission by operating park facilities, visitor centers, and park retail
772 stores; executing programs and events; advocating for park or program resources within
773 IRS published limits; recruiting and managing volunteers; and creating pathways to
774 additional sources of funding.⁵ These partnerships are authorized through a general,
775 cooperative, or cooperating association agreement governed by Director’s Order #20:
776 Agreements or Director’s Order #32: Cooperating Associations. A separate strategic
777 fundraising agreement will be used to authorize philanthropic activities by these
778 organizations. See section 6.2.3 of this Order and RM-21 for more guidance.

779 **6.2 Philanthropic Agreements**

780 The NPS will consider philanthropic partnership agreements with any interested entity, including
781 nonprofit organizations, public sector agencies with tax-exempt status, for-profit corporations,
782 and individuals.

783 Philanthropic partners are required to have written agreements with the NPS. These agreements
784 establish formal relationships that allow the NPS and our partners to accomplish our shared
785 mission in an efficient, economical, and transparent manner. Applicable laws and regulations
786 prescribe the manner or conditions under which agreements may be entered.

787 Agreements clearly outline the goals and objectives of the relationship, and the expectations and
788 responsibilities of all parties for communications, risk mitigation, sharing intellectual property,
789 co-branding efforts, accountability, and recordkeeping.

790 Philanthropic agreements may authorize non-project, NPS-related fundraising activities such as
791 annual or membership campaigns, donor cultivation events, planned giving events,
792 crowdfunding, and grants.

793 Philanthropic agreement templates, with required and recommended contents, and instructions
794 are included in RM-21. The Office of Partnerships and Philanthropy and the Solicitor’s Office
795 can provide additional advice and guidance on philanthropic agreements.

796 The term of a philanthropic agreement and partnership status will be graduated according to a
797 partner’s level of experience, expertise, and financial investment, and will take into consideration
798 the longevity and extent of the partnership.

- 799 • Supporting Partners—have given less than 10 years of service and support to the NPS.
800 New partners are in this category. The maximum term of an agreement is five years.
- 801 • Premier Partners—have given 10 to 20 years of service and support to the NPS. For
802 Premier Partners (1) the maximum term of a philanthropic agreement is increased to 10
803 years, (2) a regional director may approve a fundraising feasibility study waiver, and (3)
804 partners may refer to themselves as a “Premier Partner” of the NPS in correspondence
805 and media materials.
- 806 • Legacy Partners—long-standing partners, with 20 or more years of service and support to
807 the NPS that have made a substantial capital investment in a park/program and the

⁵ NatureBridge, the Student Conservation Association, Boy Scouts, Girl Scouts, Boys and Girls Clubs, Eastern National, Rocky Mountain Conservancy, and the Schoodic Institute at Acadia National Park are examples of NPS partners that would be considered “Strategic Philanthropic Partners.”

808 partnership. For Legacy Partners (1) the maximum term of a philanthropic agreement is
809 increased to 20 years, (2) the authorized employee for the appropriate threshold level
810 (refer to Delegations of Authority and Thresholds table in section 3.1.3) may approve a
811 fundraising feasibility study waiver, and (3) partners may refer to themselves as a
812 “Legacy Partner” of the NPS in correspondence and media materials.

- 813 • Congressionally Authorized Philanthropic Partners—organizations designated by
814 Congress, such as the National Park Foundation, or created through enabling legislation.
815 The maximum term of an agreement with these partners is 20 years.

816 For other benefits associated with each philanthropic partner tier, refer to the table and
817 supplemental information in RM-21.

818 Small-scale fundraising events that raise funds for the NPS do not require written fundraising
819 agreements. These include local or community-based activities or events that are locally
820 publicized and are not expected to exceed \$25,000 in donations. An authorized employee must
821 still consider the totality of circumstances in accepting donations from a small-scale event.

822 **6.2.1 Philanthropic Partnership Agreement**

823 This agreement is used to establish long-term relationships between the NPS and its
824 philanthropic partners and authorize them to fundraise.

825 **6.2.2 Partner Design & Construction Agreement**

826 This agreement template is used exclusively for partnership design and construction projects
827 based on the NPS Development Advisory Board (DAB) processes. See section 7 of this Order
828 for more information.

829 **6.2.3 Strategic Fundraising Agreement**

830 This is a philanthropic agreement used to authorize a strategic philanthropic partner—one
831 governed by a general, cooperative, cooperating association, or interpretation and education
832 services agreement—to conduct a short-term, fundraising activity for a specific NPS project or
833 program. The term of a Strategic Fundraising Agreement is one year, but could be renewed for
834 up to three years.

835 **6.2.4 Sponsorship Agreement**

836 This agreement between the NPS and a partner focuses on a short-term transaction, such as a
837 special event or program, intended to achieve joint messaging goals. See section 6.5 Sponsorships.

838 To prevent the appearance of endorsement or commercialization, sponsorship agreements must:

- 839 • Spell out the responsibilities of each party;
- 840 • Identify any conditions on the gift offer or acceptance; and
- 841 • Contain provisions specifying the number, type, size, and location of sponsor recognition
842 signs, including the limited use of corporate logos and name script. These provisions
843 must be included in a special park use permit, an exchange of letters, or other written
844 documentation.

845 **6.2.5 Insurance and Risk**

846 Understanding exposure to risk and taking steps to manage that exposure is essential for the
847 NPS’s nonprofit and for-profit partners. Nonprofit organizations, in particular, face exposure to
848 a wide array of legal risks. Some risks are unique to nonprofits—they may arise from an
849 organization’s tax-exempt status, fundraising and fiduciary activities of the staff and board, or
850 even the use of volunteers. As a best practice, nonprofit organizations should develop a risk
851 management plan that protects board members, the organization, and its clients from potential
852 liability.

853 Maintaining proper levels of insurance helps an organization protect itself and maintain its
854 reputation when a financial or human capital loss occurs. This is a best practice in organizational
855 management. Partner organizations should contact an insurance professional to discuss their
856 insurance needs. Many state nonprofit associations sponsor insurance programs for their
857 members or referrals to experienced agents and brokers.

858 The NPS will generally require a philanthropic partner to carry commercial general liability
859 insurance to hold activities and events in a park under a special park use permit. Depending on
860 the permitted activity, additional insurance or other kinds of financial security may be required.
861 See Director’s Order and RM #53: Special Park Uses, section 8 (Permit Provisions).

862 **6.2.6 Feasibility Studies**

863 Feasibility studies are a standard tool used by fundraising professionals to assess the likelihood
864 that a fundraising effort or campaign will be successful. The NPS requires feasibility studies for
865 philanthropic agreements at or above the \$1 million threshold and for projects that require the
866 Director’s approval. RM-21 contains more information on feasibility studies.

867 A park, region, or program may request a waiver of this requirement in some circumstances.
868 Authorized philanthropic partners at the Premier and Legacy Partner levels may request a waiver
869 for a feasibility study. Requests should be submitted to the appropriate authorized employee
870 (refer to Delegations of Authority and Thresholds table in section 3.1.3) for approval. The
871 assessment of each request will be based on:

- 872 • The partner's experience in fundraising efforts of the proposed size; and
- 873 • The superintendent’s or program manager's, and staff's, experience in executing the type
874 of project contemplated.

875 **6.3 Intellectual Property**

876 Intellectual property is an “umbrella term” that encompasses several distinct categories, each of
877 which has specific rules and regulations. When the NPS and another organization enter into a
878 partnership, the products created from that relationship are known as “developed intellectual
879 property.” Each party may enter the relationship with its own intellectual property, commonly
880 referred to as “background intellectual property.” Through mutual agreement, the NPS and a
881 partner can negotiate joint ownership of developed intellectual property for the duration of the
882 relationship. Upon termination of an agreement, all developed intellectual property will be
883 conveyed to the NPS.

884 **6.4 NPS Brand Management and Logo Licensing**

885 The NPS brand is highly recognizable in the commercial marketplace. NPS marks and logos
886 have value and their use must be controlled for strategic co-branding, quality, and mission
887 alignment.

888 NPS marks and logos include, but are not limited to:

- 889 • The arrowhead mark
- 890 • The secondary marks (negative space arrowhead/arrowhead outline)
- 891 • Park-specific logos
- 892 • Program-specific logos (for example, Volunteers-in-Parks, Junior Ranger Program,
893 Rivers, Trails, and Conservation Assistance, National Historic Landmarks, and BioBlitz)
- 894 • Specialty logos (for example, Centennial, Find Your Park)
- 895 • Interagency shared logos (for example, National Trails System, Federal Interagency
896 Council on Outdoor Recreation, Land and Water Conservation Fund)

897 The NPS arrowhead mark will not be licensed for use.

898 The NPS must approve all uses and licensing of its marks and logos by philanthropic partners
899 through agreements. The joint use of NPS and partner marks and logos can raise awareness of
900 both organizations and create momentum when launching a philanthropic campaign. Joint use
901 can also increase goodwill between the NPS and partner organizations, as well as promote brand
902 awareness. Care must be taken not to overuse NPS marks and logos, or to use them in ways that
903 would compromise the reputation and integrity of the NPS or devalue the NPS brand.

904 The NPS must approve requests to use NPS marks and logos for marketing, branding,
905 sponsorship, and commercial/retail purposes. The NPS will license its marks and logos through
906 logo-licensing agreements. Logo-licensing agreements will typically grant a partner a revocable
907 and non-exclusive right to use specified NPS marks and logos for non-commercial purposes and
908 described commercial purposes. Licensing agreements must clearly specify the logos and marks
909 subject to the license and the scope and limitations on use. If necessary to achieve partnership
910 objectives, the license may also grant a right to sub-license the use of the logos. A sub-license
911 must clearly specify the scope and limitations of use, be non-exclusive, revocable, and not allow
912 further sub-licensing.

913 Partners authorized to use the NPS marks and logos must:

- 914 • Use, and permit the use by others of, NPS marks and logos only in accordance with a
915 written agreement;
- 916 • Use any revenue generated from the use of NPS marks and logos only to support NPS
917 parks or programs, with emphasis on partner programs, promotions, events, campaigns,
918 or grants that directly benefit NPS parks and programs;
- 919 • Provide the NPS with regular status reports of existing and planned uses of any NPS
920 marks or logos;
- 921 • Provide the NPS with written accounting of revenues and expenses associated with the
922 use of NPS marks and logos; and

- 923 • Mutually determine with the NPS any continued uses or discontinuation of uses of NPS
924 logos, marks, and associated intellectual property upon the expiration or early termination
925 of an agreement.

926 See RM-21 for brand management and logo-licensing procedures.

927 **6.5 Sponsorships**

928 A successful sponsorship program can benefit the NPS, our partners, and the sponsor. A sponsor
929 can be a for-profit or a nonprofit corporation, an individual, or another government entity.

930 Sponsorship can take a number of forms, including:

- 931 • Financial Support—a financial sponsor pays a set amount of money in exchange for
932 benefits outlined in a sponsorship agreement. Examples of benefits include an
933 advertisement or mention in event programs, NPS or philanthropic partner newsletters or
934 press releases; signage; or logos on promotional materials.
- 935 • Media Support—a media sponsor finances or secures media coverage for an organization,
936 program, or event. This type of sponsorship gives a sponsor visibility by tagging ads
937 with their official logo or the wording, "brought to you by" or "sponsored by," followed
938 by the sponsor's name. Examples of media support for the NPS are the "Find Your Park"
939 campaign, donor thank-you ads in newspapers, and Public Service Announcements (PSAs).
- 940 • In-Kind Support—in-kind sponsors donate goods or services, rather than cash, as their
941 sponsorship offering. For example, a local supermarket could donate food and water for
942 a special event, equipment for a volunteer day, or paint to renovate a park structure.

943 Sponsorship opportunities with the NPS or an NPS partner offer public recognition of the
944 sponsor's connection with a charitable cause, which may help it attract new customers or clients
945 or bolster its reputation through the "halo effect" (impressions of the organization's goodwill).
946 The NPS and our partners receive financial support, in-kind services, or product donations, and
947 may experience increased media and public attention.

948 Before starting a sponsorship program, parks, programs, and authorized philanthropic partners
949 must have an approved sponsorship agreement with a sponsor that defines each entity's roles and
950 responsibilities. Superintendents or program managers should recognize sponsors in accordance
951 with their donor recognition plan.

952 A regional office will design and vet sponsorships that involve multiple parks or programs only
953 in that region. The Office of Partnerships and Philanthropy will design and vet sponsorships that
954 involve parks or programs in multiple regions. This approval process also applies to authorized
955 philanthropic partners that want to seek sponsors for their activities. All requests to use NPS
956 marks and logos must be approved by the Office of Partnerships and Philanthropy. See RM-21
957 for more information about sponsorships.

958 **7. Partnership Design and Construction Projects**

959 The NPS traditionally uses appropriated funds to design and build facilities, structures, exhibits,
960 and trails in the national parks; awards the design and construction contracts; and provides
961 project management oversight. Increasingly, construction projects in the national parks are being
962 funded, in whole or in part, with private money. Many of these funding partners would like to

963 take part in the design and construction process and, in some cases, in long-term operation of the
964 resulting asset. Design and construction projects involving partners require the use of the Partner
965 Design and Construction Agreement.

966 The NPS welcomes the interest and involvement of philanthropic partners and donors in all
967 phases of partnership construction projects. The NPS will work with partners to identify
968 opportunities for involvement in the planning, design, and construction and in associated project
969 events, tours, or community forums.

970 There are three ways in which a partner may participate in constructing facilities in national
971 parks:

- 972 1. A partner raises 100% of the needed project funding, donates the funds to the NPS, and
973 the NPS carries out the design and construction.
- 974 2. A partner raises 100% of the needed project funding, manages the design and
975 construction contracts, and donates the resulting asset to the NPS.
- 976 3. The NPS and partner both provide funds to the project. Either the partner donates funds
977 to the NPS and the NPS manages the design and construction, or each party manages
978 independent portions of the project with its own funds. A partner may not manage a
979 project or a portion of a project funded by the NPS.⁶

980 Regardless of how a partnership construction project is funded, the resulting asset is owned by
981 the United States.

982 In all three scenarios, the NPS defines these as “Partnership Construction Projects” and follows
983 the Partnership Construction Process. The intent of this process is to create common
984 expectations between the NPS and its partner and ensure that projects are properly scoped, meet
985 critical mission needs, and can be operationally sustainable.

986 The NPS Development Advisory Board (DAB) evaluates proposed Partnership Construction
987 Projects using the same criteria as those that use appropriated funds. Projects must be:

- 988 • Identified previously as a priority, consistent with park planning documents;
- 989 • Included in the NPS five-year capital plan if any appropriated funds are to be used for the
990 project; and
- 991 • Sustainable over time in terms of maintenance and operations.

992 The Partnership Construction Process, described in RM-21, offers valuable guidance for all
993 Partnership Construction Projects irrespective of their dollar value. The process is mandatory for
994 all projects with an estimated net cost of \$500,000 or more. This dollar threshold aligns with
995 DAB’s policy for all NPS construction projects. See RM-21 for guidance on partnership projects
996 below \$500,000.

997 **7.1 Design Competitions**

998 Design competitions are held periodically to generate creative ideas and community and donor
999 interest in proposed park improvements. Competitions are typically funded by park partners and

⁶ Cost-Share Funding Programs (such as the Centennial Challenge Fund Program) may require the transfer of partner funds to the NPS.

1000 may be managed by either the NPS or the partner. In either case, the NPS needs to be fully
1001 engaged in design competitions and is responsible for reviewing and approving decisions and
1002 media associated with the competitions. The Commemorative Works Act (40 USC 8901-8909)
1003 governs design competitions for memorials and facilities at national parks in the District of
1004 Columbia and its environs.

1005 Since design competitions often lead to the construction of new or expanded NPS facilities (or
1006 structures, exhibits, trails, landscapes), proposed competitions must be presented to the DAB in
1007 advance of any competition activities. DAB review is intended to ensure that:

- 1008 • The competition will be for a project that addresses a critical park need;
- 1009 • The roles and responsibilities of the NPS and partner are clear during and after the
1010 competition;
- 1011 • There are clear design competition guidelines and criteria in place;
- 1012 • Intellectual property rights are addressed; and
- 1013 • Participating designers know what their role, if any, will be in carrying out post-
1014 competition design-development.

1015 Refer to RM-21 for the DAB's 2014 policy memorandum, a Memorandum of Intent template for
1016 design competitions, and the design competition process. That process flows into and
1017 coordinates with the Partnership Construction Process, as described earlier in this section. The
1018 Associate Director for Park Planning, Facilities, and Lands will develop design guidelines, which
1019 will include specific provisions on NPS and Federal design and construction standards, and
1020 requirements for matters such as climate change, sustainability, and accessibility. In the interim,
1021 the NPS will use the General Services Administration's Design Guidelines and modify as needed.

1022 **8. Donor Recognition**

1023 It is important for the NPS and our authorized philanthropic partners to acknowledge and
1024 recognize donor contributions. Per [section 3054\(b\) of PL 113-291](#) (National Park System Donor
1025 Acknowledgment), a donor acknowledgment will not be used to state or imply:

- 1026 • Recognition of the donor or any product or service of the donor as an official sponsor, or
1027 any similar form of recognition, of the National Park Service or the National Park System;
- 1028 • A National Park Service endorsement of the donor or any product or service of the donor; or
- 1029 • Naming rights to any unit of the National Park System or a National Park System facility,
1030 including a visitor center.

1031 Decisions about donor recognition should consider:

- 1032 • The needs of donors, including privacy and confidentiality of donor information;
- 1033 • The unique purposes, resources, or requirements of individual parks and programs;
- 1034 • Whether the cost of recognition is a proper expenditure of appropriated funds;
- 1035 • Public perception of a particular donation; and
- 1036 • The integrity of the NPS brand.

1037 The Commemorative Works Act (40 USC 8901-8909) contains special requirements for donor
1038 recognition at national parks in the District of Columbia and its environs.

1039 Before the NPS accepts a donation, the NPS and the donor(s) should agree, in writing, to the
1040 form of recognition and any associated expenses. All decisions about donor recognition must
1041 follow Department of the Interior legal authorities and ethical guidelines.

1042 Public donor recognition is one way to thank donors, but it is not the only way. Some donors
1043 wish to avoid public attention. The NPS, to the extent the law allows, will respect the wishes of
1044 those donors who do not want public acknowledgement or attention.

1045 **8.1 Restrictions**

1046 Donor recognition will not state or imply NPS:

- 1047 • Endorsement of a business, brand, product, service, or enterprise;
- 1048 • Recognition of the donor as an official sponsor of the NPS or the National Park System; or
- 1049 • Naming rights to any unit of the National Park System or any NPS facility, historic
1050 structure, or feature.

1051 The NPS will not permit donor recognition that uses:

- 1052 • An advertising or marketing slogan;
- 1053 • A tagline; or
- 1054 • A statement or credit promoting or opposing a political candidate or issue.

1055 **8.2 NPS Donor Recognition Plan**

1056 All parks and programs that receive, or expect to receive, donations must have a donor
1057 recognition plan. A donor recognition plan will also help philanthropic partners understand the
1058 methods and levels of recognition the NPS can give. Donor recognition plan templates and
1059 examples are found in RM-21.

1060 **8.2.1 Development and Approval**

1061 Park superintendents and program managers will:

- 1062 • Develop and approve donor recognition plans for their respective areas; and
- 1063 • Obtain the approval of their regional, associate, or assistant director.

1064 Regional, associate, and assistant directors will approve donor recognition plans. The Office of
1065 Partnerships and Philanthropy will review any donor recognition plans that deviate from the
1066 template. Regional, associate, and assistant directors may establish common recognition
1067 standards for multiple parks in a region, or for multiple programs in a directorate.

1068 **8.2.2 Plan Requirements and Contents**

1069 Donor recognition plans must:

- 1070 • Follow applicable laws, regulations, and policies, including those found in PL 113-291,
1071 section 3054 (National Park System Donor Acknowledgment); Departmental guidance in
1072 374 DM 6; NPS *Management Policies* (2006); and this Order;
- 1073 • Follow best practices for accountability and transparency, including the requirement that
1074 all donations be used for the purposes for which they were given; and
- 1075 • Undergo annual review and be updated, as necessary, to reflect any changes in park or
1076 program needs, law, regulation, or NPS policy.

1077 A donor recognition plan defines the criteria and procedures for thanking donors, and describes
1078 the form and duration of recognition for different types of donations. The donor recognition plan
1079 templates, with required and recommended contents, are in RM-21.

1080 **8.3 Partner Donor Recognition Plan**

1081 Authorized philanthropic partners must have a written donor recognition plan as part of their
1082 partner agreement with the NPS. The partner's donor recognition plan should be consistent with
1083 a park's or program's approved donor recognition plan. Superintendents or program managers
1084 should review and approve partner donor recognition plans. This will ensure that a fundraising
1085 partner does not inadvertently lead a prospective donor to expect a level of recognition that the
1086 NPS cannot, or will not, fulfill.

1087 **8.4 Off-Site Donor Recognition**

1088 Donors may be recognized through a variety of methods, such as:

- 1089 • **Thank you letters**—all donors should promptly receive a letter of appreciation. This
1090 letter can serve as the required NPS letter of gift acceptance, and acknowledge or explain
1091 any conditions that might apply. It should also describe any in-kind gifts. Except in
1092 certain land donation cases, the letter should not attempt to value non-cash gifts. RM-21
1093 contains a model, referred to as the "Donation Acceptance Letter."
- 1094 • **Awards**—nomination for an award may be fitting recognition for some donations. Parks,
1095 regions, and programs may create and use their own awards. National award nomination
1096 calls may be publicized through InsideNPS and other sources. Park and program
1097 managers may also consider nominating a donor for non-NPS awards.
- 1098 • **Publicity**—news releases to traditional and digital media outlets (newspapers,
1099 magazines, radio, television, websites, and social media) and articles in a donor's media
1100 (corporate employee newsletter or annual report).
- 1101 • **Park and program newspaper/newsletter articles**—articles to recognize donors or
1102 highlight contributions of a friends group or other partners.
- 1103 • **Events**—media events, press announcements, photo opportunities, and other events that
1104 involve the donor (annual meetings or conferences).
- 1105 • **Mementos**—presentation of a park or program memento (a book or park/program lapel
1106 pin).
- 1107 • **Digital media** (web media, social media, and mobile apps)—parks and programs may set
1108 up virtual donor walls on websites and other digital media products.

1109 The Division Chief, Office of Partnerships and Philanthropy, and the Chief of Digital Strategy,
1110 Office of Communications, will develop standards for the design, development, and management
1111 of digital forms of donor recognition. This guidance will be available in RM-21 and on the NPS
1112 Digital Community website.

1113 **8.5 In-Park Donor Recognition**

1114 Park superintendents have a variety of in-park donor recognition options. Superintendents
1115 should determine the most suitable form, location, and duration of in-park recognition. In-park
1116 recognition should normally occur at a visitor center or in another developed area.

1117 **8.5.1 Considerations**

1118 The manner of recognition should not compete for attention with, or draw attention away from,
1119 the park's purpose.

1120 Donor recognition for historic structures should be freestanding. It must not be affixed to any
1121 “historic fabric,” either interior or exterior. Donor recognition should not be placed in natural or
1122 cultural zones where it would intrude on the character of the area or obstruct a view.

1123 Superintendents should carefully consider the cost of maintenance and replacement of fixed
1124 recognition. Superintendents and their partners must set up an endowment or maintenance fund
1125 for this purpose.

1126 **8.5.2 Suggestions for In-Park Recognition**

- 1127 • **Events**—media events, press announcements, photo opportunities, groundbreaking
1128 ceremonies, ribbon cuttings, or other recognition activities that acknowledge or involve a
1129 donor.
- 1130 • **Printed materials, temporary signage, and other temporary items**—donor
1131 recognition may be placed on NPS printed materials, such as brochures, newsletters,
1132 posters, cards, and banners, and on temporary signage or portable exhibits at park
1133 construction, restoration, or other project sites. A short, discrete credit line, with the
1134 donor’s name script or logo, may be included (see section 8.7). Donor recognition will
1135 not be placed on park and facility identity signs, regulatory, or safety signs.
- 1136 • **Recognition in interpretive programs**—where a donation is integrally tied to a park, to
1137 a park's existence, or to what is being interpreted, interpretive programs may identify the
1138 donor and the donation's use.
- 1139 • **Interpretive and digital media (exhibits, waysides, and audiovisual productions)**—
1140 donations for interpretive and digital media may be recognized with a short, discrete
1141 credit line with the donor’s logo or name script (see section 8.7). Donor recognition
1142 should be integrated into the planning and design for interpretive and digital media.
- 1143 • **Donor recognition boards and walls**—static or electronic donor recognition boards or
1144 walls may be installed in visitor centers and administrative facilities. The names of
1145 corporate or business donors will appear in the same style as all other names; corporate
1146 name scripts and logos will not be used. Donor boards and walls should be integrated
1147 into the planning and design of any new facility or renovation of an existing facility.
- 1148 • **Other opportunities**—donor books kept on display and computer terminals with
1149 searchable donor lists.
- 1150 • **Vehicles**—donor recognition, with or without an associated wrap, may be placed on an
1151 NPS vehicle, if the donation relates to the vehicle. Text may include a short, unobtrusive
1152 credit line with the donor’s name script and logo.
- 1153 • **Paving stones and park furnishings**—donor recognition⁷ is permitted on bricks, paving
1154 stones, pathways, landscaped areas, and park furnishings (such as benches, bear-proof
1155 food lockers, or theater seats). Philanthropic agreements and donor recognition plans will

⁷ Name recognition is not the same as commemoration (memorialization): To be permanently commemorated in a national park is a high honor, affording a degree of recognition that implies national importance. Commemorative works will not be established unless authorized by Congress or approved by the Director. See 36 CFR 2.62 and NPS *Management Policies*, section 9.6 (Commemorative Works and Plaques).

1156 include provisions for donation levels, duration, and an endowment to maintain, renovate,
1157 or remove the fixture or furnishings. The location and design of fixtures and furnishings
1158 must be part of an NPS-approved visitor facility and sited to avoid disturbance of natural
1159 and cultural resources and values. The placement of benches or paving stones must be
1160 confined to a visitor center area or similar high traffic area in a park. Donor recognition
1161 on benches or paving stones should be limited to the top tier of donors identified through
1162 a fundraising campaign or donor recognition plan, not to recognize all campaign
1163 participants. The threshold donation level must be commensurate with the park budget
1164 and philanthropic campaign goals. The names of corporate or business donors will appear
1165 in the same fashion as all other names; no corporate name scripts and logos will be used.

- 1166 • **Positions, programs, and endowments**⁸—programs (educational, interpretive, research,
1167 recreational, youth, or other), positions, and endowments may be named to recognize a
1168 gift made to support a program or position. The Director must approve specific naming
1169 opportunities before an offer can be made to a potential donor. Any naming must comply
1170 with all Federal statutory and regulatory requirements. In addition, hiring individuals for
1171 endowed, named positions must follow all applicable employment laws and procedures.
1172 A written agreement will outline the terms and include provisions for duration, de-naming,
1173 and renewal or termination of the position, program, or endowment. It is generally
1174 expected that the final gift would cover all position or program costs, including salaries,
1175 benefits, stipends, travel, materials, housing, program funds, and administrative overhead.
- 1176 • **Naming of interior spaces in facilities**⁹—the temporary naming of rooms and interior
1177 spaces in NPS facilities is permitted to recognize donations for the renovation of an
1178 existing facility or construction of a new facility. The Director must approve naming
1179 opportunities before an offer can be made to a potential donor. The naming opportunity
1180 value should be at a level commensurate with the park budget and fundraising campaign.
1181 Naming is limited to a period of five years. A philanthropic agreement will define the
1182 naming terms and contain provisions for the duration, de-naming, and demolition or
1183 renovation of named spaces. The final gift must be sufficient to cover operation,
1184 maintenance, and lifecycle costs of the named space. No structures or historic or natural
1185 features may be named, nor may structures or features with existing names be renamed.

1186 **8.6 Donor Recognition for NPS Programs**

1187 Donations for NPS programs may be recognized with a credit line or statement of appreciation
1188 on program materials distributed at an event to which a donation was made. Examples include a
1189 “Thank you” on t-shirts, key chains, water bottles, hats, or first aid kits.

1190 **8.7 Use of Logos, Name Script, and Credit Lines**

1191 The use of corporate name scripts or logos may be a proper form of donor recognition in some
1192 circumstances. Short, discrete, and unobtrusive credit lines may incorporate logos or name
1193 script, as appropriate. Careful attention should be paid to the manner in which they are used.

⁸ Any naming must comply with laws, regulations, and policies, including but not limited to the Commemorative Works Act (40 USC 8901-8909), Section 106 of the National Historic Preservation Act (54 USC 306108), and NPS *Management Policies* section 9.6 (Commemorative Works and Plaques).

⁹ Refer to preceding footnote about naming.

1194 The use of name scripts or logos may be permitted on printed materials, temporary signage, other
1195 temporary items, interpretive and digital media, and vehicles. The use of name scripts and logos
1196 is not permitted on donor recognition boards or walls, paving stones, or park furnishings.

1197 **8.8 Recognition of Corporate Donations**

1198 Corporate donors may receive recognition on the same basis as other donors, if the recognition
1199 does not suggest official endorsement. Except when permitted by specific statutory authority,
1200 Federal ethics regulations prevent Federal employees from using their official positions, titles, or
1201 any associated authorities to endorse any products, services, or enterprises.

1202 **8.9 Special Events**

1203 Guidance for holding special events in parks is found at [36 CFR 2.50](#) (Special events), special
1204 regulations for the National Capital Region at 36 CFR 7.96(g), in [section 8.6.2](#) of NPS
1205 *Management Policies* (2006), and in Director's Order and RM #53: Special Park Uses.
1206 Director's Order #21 applies to NPS or partner recognition of donors at such events. Special
1207 events fall into three categories:

- 1208 1. Events wholly or partially sponsored by the NPS;
- 1209 2. Events held by NPS-authorized philanthropic partners; and
- 1210 3. Non-NPS events allowed under a special park use permit.

1211 Some areas of the National Park System may have site-specific requirements for special events.

1212 **8.9.1 Sponsored Events**

1213 The NPS may recognize event sponsors as long as corporate names are not used in a way that
1214 would imply or suggest NPS endorsement of a product, service, or company, or be construed as
1215 commercial solicitation or advertising. Corporate sponsors may be recognized at special events
1216 by limited use of corporate logos and name script on event facilities, signs, and in literature. The
1217 size, scale, scope, and location of corporate logos and name script should not dominate the event
1218 facilities or area. The NPS will not permit the appearance of advertising and marketing slogans
1219 and taglines. The purpose of recognition is simply to acknowledge the sponsor.

1220 **8.9.2 Authorized Philanthropic Partner Events**

1221 An authorized philanthropic partner, with a special park use permit to hold a fundraising event in
1222 a park, may recognize donors and event sponsors at the event. The forms of recognition should:

- 1223 • Be described in the partner's approved work and donor recognition plans; and
- 1224 • Follow the standards for recognition for Sponsored Events outlined in section 8.9.1.

1225 **8.9.3 Non-NPS Events**

1226 Guidance on this topic is in [Director's Order and RM #53: Special Park Uses](#). Temporary
1227 displays directly associated with an event may show sponsors' names, logos, or name scripts.
1228 These displays may be placed near the event in both time and location. Distribution of free
1229 products or samples to park visitors is not permitted at non-NPS events.

1230 -----End of Director's Order-----