

# BLM Donation Guidelines

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Managing By Network

# What are the Donation Guidelines?

Provide policy and guidance for the acceptance, use, recognition, and where appropriate, the solicitation of donations by the BLM

# What is a Donation?

Includes non-federal “gifts” and refers to something of value (cash or in-kind goods or services) received from sources without consideration or an exchange of value

# What are the authorities for BLM's Acceptance of Donations

The Federal Land Policy and Management Act (FLPMA) 43 U.S.C. § 1737, Section 307 which permits the BLM to “...accept contributions or donations of money, services, and property for the management, protection, development, acquisition, and conveying of public lands.”

# Who is Responsible for Implementing BLM's Donation Policy Program?

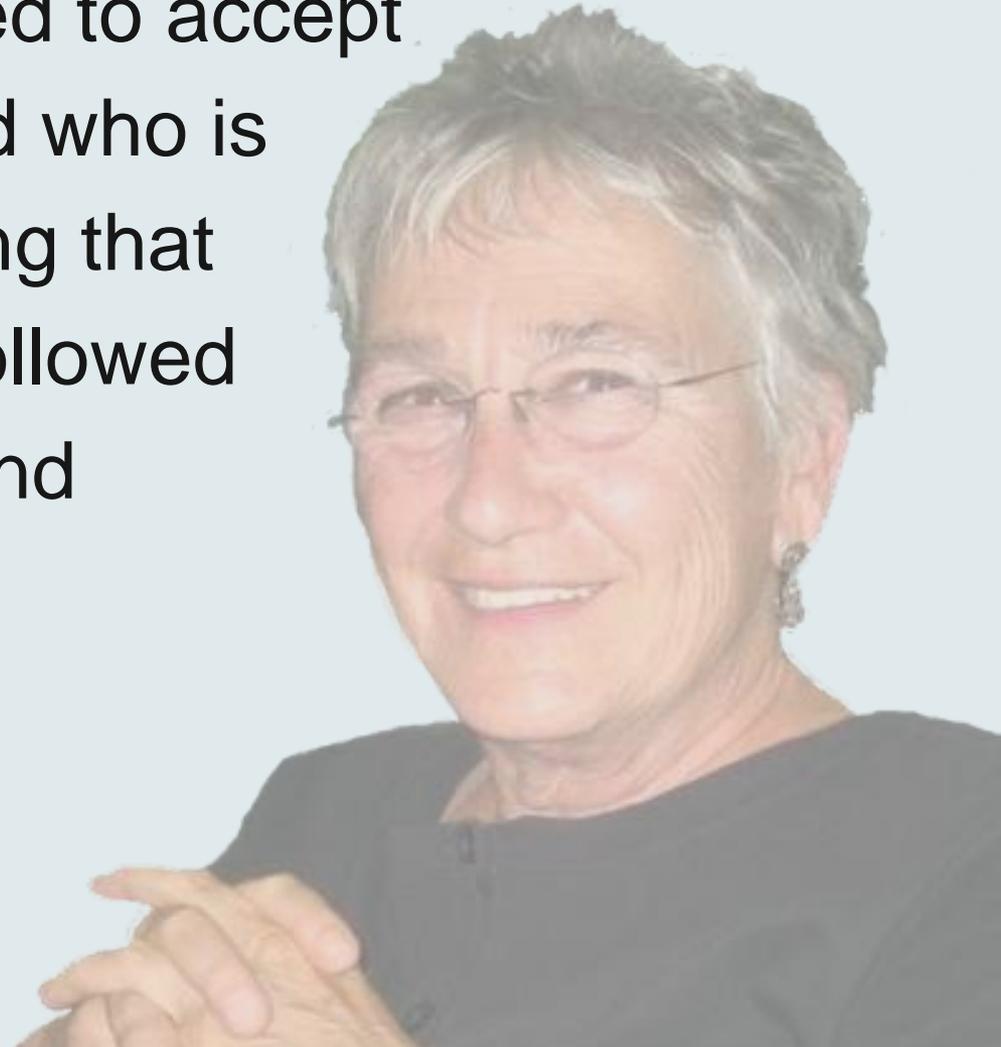
The Director, National Landscape Conservation System and Community Partnerships was designated by the Director of BLM as the Senior Manger

# Guidelines Provide the Following:

- Show delegation of authority for the acceptance and solicitation of donations
- Establish guidelines for reviewing and evaluating potential donations

# What is an Authorized Employee?

An individual authorized to accept or reject donations and who is responsible for ensuring that these guidelines are followed in evaluating donors and donations to the BLM



# Characteristics of an Authorized Employee

Must have sufficient experience, training, and organizational responsibility to be able to fully consider all relevant factors, and the totality of circumstances when accepting or rejecting donations

# Delegation of Authority

The following authorized employees have been delegated the authority to evaluate and accept or decline a proposed donation:

Director - \$1,000,000 or more

Senior Manager - below \$1,000,000

State/Center Directors - below \$1,000,000

District/Field Managers - below \$250,000

# How Do You Review and Evaluate Potential Donations?

First, determine that the totality of circumstances regarding the donation maintains:

- Integrity of BLM program and operations
- Impartiality and appearance of impartiality of the BLM and their employees
- Public confidence in the BLM, their programs, and employees

# What Is a Donor Certification Form?

U.S. Department of the Interior  
Donor Certification Form

DI-3680

OMB Control No. 1090-0009 expires: 07/31/12

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

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

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

1. I \_\_\_\_\_ am / \_\_\_\_\_ am not involved in litigation or other controversy with the Department or its bureaus.
2. I \_\_\_\_\_ am / \_\_\_\_\_ am not seeking or otherwise engaged in any type of financial or business relationship with the Department, for example, a contract, permit, lease, grant, or cooperative agreement.

# Field/District Authorized Employees:

- Ensure compliance with guidelines
- Ensure sufficient information about donor and donation available to make a decision
- Enter into written fundraising agreements

# Field/District Authorized Employees:

- Respond in a timely manner
- Document, report donation activities
- Seek guidance on questionable donations

# How Do You Report Donations?

- In accordance with applicable statutes and regulations, e.g., Paperwork Reduction Act, and documentation requirements required by 374.DM 6.12
- Point of Contact responsible for all documentation related to donations

# What Is A Point of Contact?

- BLM employee who serves as the intermediary between the BLM office being offered the donation, the State or Center Office, and the BLM Senior Manager
- Facilitates approval/refusal of donations by obtaining additional information
- Maintains donation records in accordance with applicable statutes and regulations

# How Do You Recognize Donors?

- At a minimum, acknowledge all direct donations in writing through a letter of acceptance
- All donors receive timely, appropriate, consistent, and reasonable recognition and thanks, expressed in letters of appreciation, press releases, public events, certificates and/or plaques or similar items

# What Is a Fundraising Agreement?

Written document which allows BLM to evaluate fundraising objectives, plans, and schedules, minimize overlap with other fundraising efforts, ensure compliance of fundraising activity with BLM policy

# What Is a Fundraising Agreement?

Vary in format and substance, depending upon scope, size, and length of fundraising effort

May be for a particular short-term effort or broadly cover long-term project with many numerous specific fundraising activities

# Contents of a Fundraising Agreement?

- Name of entity applying to fundraise
- Contacts for entity and BLM
- Is entity a 501(c)(3)?
- Project/object for which funds will be raised

# Contents of a Fundraising Agreement?

- What is the fundraising goal?
- What are the provisions for accountability, security of funds?
- How will funds be raised?
- Timeframe?

# Elements of a Fundraising Agreement?

- Will additional resources be required? If yes, what are they and how will they be acquired?
- How will entity address various contingencies including cost overruns?
- Is vetting process required? If yes, need to fill out Donor Certification Form

# Elements of a Fundraising Agreement?

- How will the entity prevent actions that imply BLM endorses the business, products or services of donors?
- What are donor recognition activities and processes?

# When and Why Is a Fundraising Agreement Needed?

**When?** Anytime there is fundraising conducted on behalf of BLM or any of its programs

**Why?** To ensure fundraising for the BLM is conducted in a manner that ensures the integrity and impartiality of and public confidence in the BLM and its programs

# Consequences of Proceeding without a Fundraising Agreement?

- Fundraising with no agreement? BLM may not be able to accept donations raised on its behalf
- BLM may terminate agreement at its discretion

# Summary

## Important to remember

1. Only authorized employees can accept or reject donations
2. There are different delegations of authority for different classes of authorized employees
3. Must now vet donors using the Donor Certification Form or obtain information included on the Form
4. Need a Fundraising Agreement with entities fundraising on behalf of the BLM

“Wisdom is  
knowing what to  
do next,  
skill is knowing  
how to do it,  
and virtue is  
doing it.”

- David Starr Jordan

