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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**Duration:** This Order will remain in effect until amended or rescinded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.<sup>1</sup>

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

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<sup>1</sup> 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)<sup>2</sup>;
- 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

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<sup>2</sup> 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.

<b>Delegations of Authority and Thresholds for Donation Acceptance and Agreements Approval for Fundraising, Capital Campaigns, and Partnership Construction*</b>		
<b>Authorized Employee</b>	<b>Base Thresholds**</b>	<b>Thresholds with Certification and Training***</b>
<b>Director/Deputy Directors</b>	Over \$1 million	Over \$5 million may be delegated by the Director
<b>Associate/Assistant Directors/CFO</b>	Less than \$1 million	Up to \$5 million may be delegated by the Director
<b>Assistant Director of Partnerships and Civic Engagement</b>	\$250,000 or more	Up to \$5 million may be delegated by the Director
<b>Regional Directors (RD)</b>	Less than \$1 million	Up to \$5 million may be delegated by the Director
<b>WASO Division Chief, Office of Partnerships and Philanthropy</b>	N/A	Up to \$1 million may be delegated by Assistant Director, Partnerships and Civic Engagement
<b>Superintendents</b>	\$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 Philanthropy<sup>3</sup> 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:

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<sup>3</sup> 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:

- 372
- 373
- 374
- 375
- 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 account<sup>4</sup>,  
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.

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<sup>4</sup> 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.<sup>5</sup> 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

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<sup>5</sup> 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.<sup>6</sup>

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

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<sup>6</sup> 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 recognition<sup>7</sup> 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

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<sup>7</sup> 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**<sup>8</sup>—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**<sup>9</sup>—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.

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<sup>8</sup> 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).

<sup>9</sup> 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-----