

ATTACHMENT B - DONATION REVIEW PROCESS

The NPS and the Partner share a mutual objective of ensuring that the Partner's fundraising and donation activities do not give rise to an appearance of a loss of integrity or impartiality or otherwise reduce public confidence in the Partner or the NPS. Therefore, the Partner agrees to exercise due diligence in accepting donations consistent with the following:

(A) Donation Review Process

- (i) For donations to the Partner and subsequently made to the NPS (defined by DO21 as "indirect donations") in excess of \$500,000, the partner will provide the donor's identity and other pertinent information to the NPS Office of Partnerships and Philanthropic Stewardship through the Regional Partnership Coordinator for review and approval according to NPS donor review policy.
- (ii) For donations under \$1,000, anonymous donations, and donations solely to support the Partner's general administrative/operational needs or projects that do not involve NPS, no donor vetting will be required.
- (iii) For donations for the benefit of the NPS between \$1,000 and \$500,000, the Partner will take reasonable efforts to determine whether the donation:
 - a. Considering the totality of the circumstances, could generate controversy, give the appearance of a conflict of interest, result in a loss of integrity, impartiality or the appearance of impartiality, harm public confidence in the NPS, the Department, and their programs and employees, or associate the NPS with products that are inconsistent with the NPS mission such tobacco or any illegal product. See Chapter 5.4 of RM 21 for additional information
 - b. In its review, the partner will:
 - 1. Search <https://sam.gov/> to determine if the donor has been debarred from contracting with DOI or another federal government agency. If they are excluded from doing business with the NPS, the donation should not be accepted. If they are debarred from an agency other than the NPS, review the reasons and parameters surrounding the exclusion to determine if donation acceptance would violate the standards described above.
 - 2. Carry out an internet search to determine whether donation acceptance would violate the standards described above. Donations where the donor has a recent public history of civil or criminal violations or is involved in litigation with the DOI or NPS require careful discussion and analysis with NPS to determine whether the donation is acceptable.
 - c. If there is a potential concern, the Partner will inform the Superintendent (or

his or her designate) who will make a final determination and/or route it to the next level of review, if required.

- i. In the event that the Partner, after reasonable efforts, concludes that one or more of the above factors is applicable, the Partner will inform the NPS Key Official (or his or her designate) who will make a final determination as to whether NPS will accept or decline having such contribution spent on NPS-approved projects. NPS written approval is required prior to the Partner's acceptance of the donation and prior to any public announcement or public release about the donation.
- (iv) The NPS will use its best efforts to complete any approval required of it under this Agreement within six (6) weeks. The NPS will promptly notify the Partner as to whether or under what circumstances the Partner may accept the donation.