



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

Release
1-1801

Date
11/19/2019

MANUAL TRANSMITTAL SHEET

Subject

1105 – Donations, Solicitation, and Fundraising (Public)

Explanation of Material Transmitted: This release transmits policy, which tiers off the Department's Donations Policy (Departmental Manual Part 374, Employee Responsibilities and Conduct; Chapter 6: Donations Policy – 374 DM 6), and provides guidance on accepting, soliciting, using, and acknowledging donations. The policy also establishes procedures for reviewing and evaluating potential donors and donations, and for depositing, tracking, and documenting the receipt and disposition of donations. The policy also includes guidance to the BLM about fundraising by non-Federal entities on the BLM's behalf. Finally, the policy identifies the BLM's authorities for, and the Director's delegations of authority for, accepting and soliciting donations. A new BLM subject function code – 1105, Donations – has been established for donation-related activities.

2. Reports Required: None.

3. Material Superseded: None.

4. Filing Instructions: File as directed below.

REMOVE

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NONE

All of 1105
(Total 43 sheets)

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Acting Assistant Director
National Conservation Lands and Community
Partnerships

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Chapter 1 - Overview

1.1 Purpose

The purpose of this manual is to:

- A. Tier off the Department of the Interior's (Department) donations policy (Departmental Manual Part 374, Employee Responsibilities and Conduct; Chapter 6: Donation Guidelines – 374 DM 6);
- B. Establish Bureau of Land Management (BLM) policy for, and guidance on, accepting, soliciting, using, and acknowledging donations and identifying Authorized Employees;
- C. Establish procedures for reviewing and evaluating potential donors and donations;
- D. Establish procedures for depositing, tracking, and documenting the receipt and disposition of donations;
- E. Provide general guidance to the BLM about fundraising by non-Federal entities on the BLM's behalf; and
- F. Identify the authorities that permit the BLM to accept and solicit donations.

1.2 Objectives

The BLM's objectives for implementing this policy are to:

- A. Identify the Director's delegations of authority – Authorized Employees – for accepting and soliciting donations;
- B. Establish roles and responsibilities for the BLM's Donations Senior Manager and employees authorized to accept and/or solicit donations;
- C. Establish procedures for evaluating potential donations to determine whether acceptance is appropriate;
- D. Provide guidance to the BLM about fundraising by non-Federal entities on the BLM's behalf, including the content of fundraising agreements; and
- E. Provide guidance on donor recognition.

1.3 Authority

- A. The types of permissible donations depend on the specific provisions of the authorizing statute(s), which usually allow donations of real and personal property, services, and/or

money. The primary legislative authorities for permitting the BLM's acceptance of donations are listed below. Individual units of the National Conservation Lands may also have specific legislative authorities to accept donations.

1. Federal Land Policy and Management Act (FLPMA) of 1976, as amended, (43 U.S.C. § 1737, Section 307; § 1715, Section 205; § 1721, Section 211, (a) and (b)).
 2. Taylor Grazing Act (43 U.S.C. §§ 315h, 315i).
 3. Take Pride in America Act (16 U.S.C. § 4601, Section 1103)
- B. An Authorized Employee shall consult the Office of the Solicitor to resolve any questions regarding the BLM's authority to accept a particular proposed donation.

1.4 Responsibility

- A. The **Director** is responsible for implementing the BLM's donations policy.
- B. The **Assistant Director, National Conservation Lands and Community Partnerships**, is the BLM's Donations Senior Manager responsible for the BLM's donation-related activities. The Assistant Director:
1. Oversees the BLM's donation-related activities and provides guidance to ensure effective and appropriate use of the donations the BLM receives;
 2. Ensures BLM employees adhere to the Department's donations policy (374 DM 6) and this manual;
 3. Reviews and approves donations valued at \$250,000 or more – single, one-time donations or a series of expected donations cumulatively over time – and for all donations of any dollar amount that stipulate conditions potentially significant for the BLM and/or the BLM's budget or programs;
 4. Coordinates with other bureaus, through the Departmental Office of Financial Management, to obtain review of proposed donations to the BLM valued at \$1,000,000 or more;
 5. May use other staff with specific subject matter expertise, as appropriate, to assist with the implementation of this section.
- C. The **Assistant Director, Business Fiscal and Information Resources Management**, develops and oversees standard procedures, with concurrence from the BLM's National Operations Center, for depositing and tracking monetary donations/contributed funding.

- D. The **Assistant Director, Energy, Minerals & Realty Management**, oversees standard procedures for documenting and tracking the receipt and disposition of real property donations.
- E. **Authorized Employees** (see Section 1.6.B.) must comply with the Department’s donations policy, this BLM manual, and ethics rules whenever a donation is offered. Authorized Employees must:
1. Gather sufficient information about a prospective donor to evaluate the appropriateness of the donation;
 2. Evaluate all factors, including the value and purposes of the donation and the nature and interests of the donor, to determine whether to accept the donation;
 3. Determine if a proposed donation of any value stipulates conditions that may have significant implications for the BLM, and/or BLM’s budget or programs and, if so, refer the donation to the BLM’s Donations Senior Manager for consideration and approval before accepting the donation;
 4. Ask the Office of the Solicitor for guidance in resolving issues if the circumstances are unclear or questionable, e.g., if an answer on the BLM Checklist to Determine Appropriateness of Donation (Appendix 1) is a “yes” or “maybe” and is challenging to address, if the donation is from a prohibited source, etc.; and
 5. Consider additional concerns raised by a proposed donation that:
 - a. Is made to an outside non-profit entity or partner and subsequently that entity or partner makes a related donation to the BLM;
 - b. May include an expectation of involvement with marketing or advertising;
 - c. Has conditions attached;
 - d. Is from a donor who is involved in a lawsuit or other controversy with the Department or with the BLM;
 - e. Is from a donor whose activities are regulated by the Department or the BLM; or
 - f. Is from a donor who is a prohibited source (see Glossary of Terms).

1.5 References

- A. BLM Manual Section 1114 – Volunteers
- B. BLM Manual Section 1520 – Personal Property Management

- C. BLM Manual Section 1530 – Real Property Management
- D. BLM Real Property General Operating Procedures Handbook, H-1530-1
- E. BLM Acquisition Handbook, H-2100-1
- F. 374 DM 6, Departmental Donations Policy
- G. Interior Property Management Directives (IPMD)
- H. 410 DM 1, Departmental Personal Property Management: Scope, Policies, and Responsibilities
- I. Standards of Ethical Conduct for Employees of the Executive Branch – 5 CFR Part 2635

1.6 Policy

A. General Policy

1. What is the BLM's donation policy?

- a. The BLM's policy is to:
 - i. Accept, use, and acknowledge donations in a manner that promotes and furthers the mission and goals of the BLM, consistent with applicable laws and the Department's donations policy (374 DM 6);
 - ii. Decline donations in particular cases when there are binding conditions on the donation inconsistent with the BLM mission or when the donations necessitate activities that circumvent applicable Government regulations; and
 - iii. Solicit donations in limited circumstances (see Section 1.6.F.1.).
- b. Before accepting a donation, an Authorized Employee must determine, as described in Section 1.6.C.1, that the circumstances of the donation maintain:
 - i. The integrity of the Department's and the BLM's programs and operations;
 - ii. The impartiality and appearance of impartiality of the Department, the BLM, and its employees; and
 - iii. Public confidence in the Department, the BLM, its programs, and its personnel.

- c. Before accepting a donation, Authorized Employees must seek guidance from the Office of the Solicitor to resolve any issues associated with a particular donation whenever the circumstances are unclear or questionable (i.e., when any answer on the BLM Checklist to Determine Appropriateness of Donation (Appendix 1) is a “yes” or “maybe” and is challenging to address).

2. What is the scope of this policy?

- a. This policy applies to BLM activities related to donations for which the BLM has statutory authority to accept and/or solicit. The BLM’s primary legislative authorities are listed in Section 1.3.
- b. This policy does **not** apply to the following situations:
 - i. Services of individual volunteers or groups of volunteers provided to the BLM under Volunteer Services Agreements authorized under the BLM’s volunteer acceptance authorities, including 43 U.S.C. § 1737(d), and in accordance with the BLM volunteer policy (BLM Manual Section 1114);
 - ii. A person’s or entity’s share of costs where there is independent cost-sharing authority, such as challenge cost-share programs where there is no public fundraising for the partner’s cost share;
 - iii. Monies received by the BLM as fees for services;
 - iv. Cost reimbursements under 43 U.S.C. § 1734(b) or 1764(g), including those for reports, studies, or environmental analyses that are legally required (e.g., under the National Environmental Policy Act), or that are funded by an applicant or outside party, or other work related to the processing of applications or permits;
 - v. Donations of expenses related to official travel covered under the authority of 31 U.S.C. § 1353;
 - vi. Donations or contributions associated with the BLM’s exercise of regulatory authority, such as donations or contributions to implement mitigation associated with a public land use authorization, and donations or contributions involving the donation of land, or interests in land, that the BLM will use for conservation purposes;
 - vii. Gifts to individual BLM employees separately governed by the Standards of Ethical Conduct for Employees of the Executive Branch at 5 CFR Part 2635;

- viii. Funds received through agreements for which there is an independent statutory authority other than FLPMA, such as the Economy Act, the Intergovernmental Cooperation Act, the Intergovernmental Personnel Act, and the Stevenson-Wydler Technology Innovation Act; and
- ix. Travel, subsistence, and other expenses incident to an employee's attendance at training at a non-Governmental facility under the authority of 5 U.S.C. § 4111.

3. What types of donations may the BLM accept?

- a. The BLM may accept donations from many sources, such as individuals and non-profit and for-profit organizations. Donations may include:
 - Money, including contributed funding, for either restricted or unrestricted purposes;
 - Tangible personal property, e.g., museum collections, vehicles, boats, furniture, collectibles, works of art;
 - Intangible personal property, e.g., securities, such as stocks;
 - Real property (land) or interests in real property;
 - Planned and phased giving, e.g., estate planning, bequests, charitable gift annuities, charitable trusts, retirement plan or life insurance beneficiary designations; and/or
 - In-kind contributions, e.g., goods, services, expertise

4. How may donations to the BLM be used?

- a. Donations to the BLM may be used to fund or otherwise support any BLM activity or program for which appropriated funds could be used, and only for the purpose of promoting and furthering the mission and goals of the BLM.

B. Authorized Employees

1. Who is authorized to approve and accept donations to the BLM?

A limited number of BLM officials, known as Authorized Employees, are authorized to accept and approve donations. Table 1-1 shows who may accept and approve a donation to the BLM and the dollar thresholds they may approve and accept.

Table 1-1: Employees Authorized to Approve and Accept Donations

Authorized Employee	Donation Type*	Threshold/Value**
Director	Donations other than real property	Donations of any value
	Real property	Donations of any value
State Directors	Donations other than real property	• donations valued at \$250,000 or less per donor in a single year, or • a series of pledged donations with a cumulative value of \$250,000 or less from any one donor over several years
	Real property	Donations of any value
District Managers	Donations other than real property	• donations valued at \$50,000 or less per donor in a single year, or • a series of pledged donations with a cumulative value of \$50,000 or less from any one donor over several years
Field Managers; Monument Managers who report directly to the State Director	Donations other than real property	• donations valued at \$25,000 or less per donor in a single year, or • a series of pledged donations with a cumulative value of \$25,000 or less from any one donor over several years

*This includes donations of money/contributed funding, products, services, or personal property. Real Property Donations are donations of land or interests in land.

**Proposed donations of money/contributed funding, products, services, or personal property per donor valued at \$250,000 or more – single, one-time donations in a single year or a series of pledged donations over several years– must be referred to the Donations Senior Manager for a final determination on whether to accept or decline the proposed donation (see Section 1.6.C.3.).

a. Director. The Director may:

- i. Accept donations of money/contributed funding, products, services, and personal property of any value. (For donations of \$1,000,000 or more, see Section 1.4.B.4.);

- ii. Accept donations of real property of any value when the Office of the Solicitor has approved title, and when acceptance complies with the policies and procedures established within the BLM Acquisition Handbook, H-2100-1. Procedures for acceptance of land donations are described in Chapter IV.C. of the Handbook. Chapter II, Section II, of the Handbook outlines the responsibilities of BLM managers, including how they should coordinate with the Office of the Solicitor and the Department of Justice in the land acquisition approval process. (For donations of \$1,000,000 or more, see Section 1.4.B.4.).

b. State Directors. For donations in their respective States and/or programs, State Directors may:

- i. Accept donations of money/contributed funding, products, services, and personal property valued at \$250,000 or less per donor in a single year or a series of pledged donations with a cumulative value of \$250,000 or less from any one donor over several years; and
- ii. Accept donations of real property of any value when the donations meet the same requirements as the Director must meet, as outlined in Section 1.6.B.1.a.ii.

c. District Managers may:

- i. Accept donations of money/contributed funding, products, services, and personal property valued at \$50,000 or less per donor in a single year, or a series of pledged donations with a cumulative value of \$50,000 or less from any one donor over several years.

d. Field Managers, Monument Managers who report directly to the State Director may:

- i. Accept donations of money/contributed funding, products, services, and personal property valued at \$25,000 or less per donor in a single year, or a series of pledged donations with a cumulative value of \$25,000 or less from any one donor over several years.

2. Who is authorized to solicit donations on behalf of the BLM?

BLM employees may not solicit donations unless the Donations Senior Manager specifically authorizes them to do so in writing and only where statutorily allowed and appropriate. This general prohibition on solicitation does not apply to the Director, who may solicit donations from private individuals or organizations for the BLM and its programs.

Table 1-2: Employees Authorized to Solicit Donations

Authorized Employee	Donation Type*	Threshold/Value**
Director	Donations other than real property	Of any value
	Real property	Of any value

*This includes donations of money/contributed funding, products, services, or personal property. Real Property Donations are donations of land or interests in land.

**Proposed donations of money/contributed funding, products, services, or personal property per donor valued at \$250,000 or more – single, one-time donations in a single year or a series of pledged donations over several years– must be referred to the Donations Senior Manager for a final determination on whether to accept or decline the proposed donation (see Section 1.6.C.3.).

a. **Director.** The Director may:

- i. Solicit donations of money/contributed funding, products, services, and personal property of any value. (For donations of \$1,000,000 or more, see Section 1.4.B.5.); and
- ii. Solicit donations of real property of any value when the Office of the Solicitor has approved title and acceptance complies with the policies and procedures established within the BLM Acquisition Handbook, H-2100-1. Procedures for acceptance of land donations are described in Chapter IV.C. of the Handbook. Chapter II, Section II, of the Handbook outlines the responsibilities of BLM managers, including how they should coordinate with the Office of the Solicitor and the Department of Justice in the land acquisition approval process.

b. **Donations Senior Manager.** The Donations Senior Manager may authorize employees in writing to solicit donations from third parties only in limited circumstances:

- i. The written authorization must clearly describe the scope of the authorized solicitation, including the type and threshold/value of donation, how the employee may solicit donations, the timeframe, permissible entities that the employee may solicit, and any restrictions on the solicitation activity.
- ii. Employees must not portray Congress, the Department, or the BLM as having failed to meet their respective responsibilities. Consistent with anti-lobbying provisions, including those in 18 U.S.C. § 1913, employees must

not make any statement or take any action implying that the employee is seeking to have the third party contact a government official in an attempt to influence that official in any way.

- iii. It is not considered a solicitation for BLM employees to provide information, as appropriate, regarding the BLM's authority and ability to accept donations in support of BLM projects and programs (see Section 1.6.F1.b.iii.).

3. What qualifications and training must Authorized Employees have to accept donations?

Authorized Employees must have sufficient experience, training, and organizational responsibility to be able to fully consider all factors and circumstances when accepting donations. At a minimum, Authorized Employees must be familiar with and understand the Department's donations policy and this BLM manual. Online training includes Department of the Interior Donations Policy Overview (DOI Learn Course 2611), sponsored by the Department.

C. Donation Review and Evaluation

1. What are the factors Authorized Employees must consider when evaluating a proposed donation of any type or value?

This section describes the factors Authorized Employees must consider when determining whether to accept or decline a proposed donation of any type or value. Each of the factors should individually be considered before the Authorized Employee makes a decision to accept or decline a proposed donation, as each factor is important when evaluating the totality of circumstances and making donation-related decisions. Authorized Employees must seek guidance from the Office of the Solicitor to resolve issues associated with particular donations whenever the circumstances are unclear or questionable, i.e., when any answer on the BLM Checklist to Determine Appropriateness of Donation (Appendix 1) is a "yes" or "maybe" and/or challenging to address.

Authorized Employees may accept a donation only for the purpose of promoting and furthering the mission and goals of the BLM, and when the acceptance of that donation is advantageous to the BLM. The accepting Authorized Employee should also consider possible future expenditures necessitated by the donation, e.g., operating and maintenance costs. Only Authorized Employees may accept donations (see Section 1.6.C., Table 1-1).

Authorized Employees must act in a legally and ethically appropriate manner and document the factors considered in their decision making. Appendix 1 (BLM Checklist to Determine Appropriateness of Donation) provides a checklist to help

determine and document the appropriateness of a proposed donation. This checklist is required for any donation, or series of donations, valued at \$250 or more; its use is encouraged for all donations. The information requested on the Departmental Donor Certification Form-DI 3680 (Appendix 2) is required for all donations valued at \$25,000 or more.

Following are the basic factors Authorized Employees must consider when evaluating a proposed donation of any type or value:

- a. Would the donation maintain the integrity of the Department's and the BLM's programs and operations?
 - i. Does the donation appear (because of the amount or circumstances) to be an attempt to influence regulatory or other Departmental or BLM authority, or otherwise secure benefits or services?
 - ii. Does the donation meet a legitimate Department or BLM need and does it require commitment of funding not currently available or anticipated?
 - iii. Does the donation promote and enhance the BLM's mission, an individual program, or unit?
 - iv. Is the donation consistent with (and not a means to circumvent) law, regulation, or policy?
 - v. Is the BLM able to properly use and manage any donated real property, (including land or land interests) or personal property within policy, programmatic, and management goals?
 - vi. If there are conditions attached to the donation, are they consistent with authorized purposes and with any relevant BLM policy or planning documents?
 - vii. Will the donor use the donation to state or imply the Department's or the BLM's endorsement of the donor or the donor's products or services?
 - viii. Is the donation (if consisting of personnel or funding to hire personnel) structured such that donated or funded personnel do not inappropriately influence any Departmental or BLM regulatory action or other significant decision?
- b. Does the donation maintain the impartiality, and appearance of impartiality, of Department and BLM employees?

- i. Does the amount of the donation influence (or appear to be seeking to influence) any pending Department or BLM decision or action involving the donor's interests?
- ii. Could the BLM's acceptance of the donation be construed as an actual or an implied commitment by the Department or the BLM to take action favorable to the donor in exchange for the donation?
- iii. Could the BLM's acceptance of the donation be construed as special treatment for the donor by the BLM or the Department?
- c. Does the donation maintain public confidence in the Department's and BLM's programs and personnel?
 - i. Will accepting the donation cause substantial public controversy?
 - ii. If there are conditions on a donation, are they consistent with the Department's and the BLM's policies, goals, and programs?
 - iii. Does the donation consist of goods or services not needed by the BLM?

2. What procedures must be followed by Authorized Employees when evaluating and documenting a proposed donation?

For donations/contributed funding other than cash in donation boxes or nominal cash donations proffered at Visitor Centers or other BLM sites, an Authorized Employee must:

- a. Evaluate a prospective donor each fiscal year in which a donation is offered. This applies to both one-time and phased donations (see Glossary of Terms). If the information related to a prospective donor has significantly changed, the Authorized Employee should re-evaluate the prospective donor.
- b. Complete the Checklist to Determine Appropriateness of Donation (Appendix 1) to document the evaluation process for donations valued at \$5,000 or more.
- c. Ask the proposed donor to fill out and return a Donor Certification Form-DI 3680 (Appendix 2) if the donation is valued at \$25,000 or more.
- d. Determine what additional information (if any) is necessary to evaluate the circumstances of the proposed donation. This information includes whatever is necessary to evaluate the acceptance factors described in Section 1.6.C.1. and reflected in the Checklist to Determine Appropriateness of Donation (Appendix 1) and will include (but is not limited to) the value and any conditions of the proposed donation.

- i. For all proposed donations with conditions (see Glossary of Terms), the Authorized Employee must:
 - (a) Consider and negotiate each proposed donation on a case-by-case basis;
 - (b) Ensure that a proposed donation is allowable under relevant authorities;
 - (c) Ensure the associated costs of administering the donation are commensurate with the benefits received; and
 - (d) Determine whether the donation terms comply with the Department's donations policy (374 DM 6); this BLM policy; and the BLM's mission, goals, and objectives.
- ii. For proposed donations of land or interests in land, the Authorized Employee must comply with the policies and procedures within this manual and those established within the BLM Acquisition Handbook, H-2100-1 (see Chapter IV.C. of this Handbook). Authorized Employees must also give special consideration to the donation's conditions (if any) and the costs necessary to develop, manage, and maintain the property to meet BLM objectives and to satisfy any special conditions.
- e. Refer the proposed donation to the Department's Office of the Inspector General (OIG) or appropriate investigating office to obtain information about the prospective donor if the Authorized Employee has any reason to believe the donor is or has been the subject of an OIG investigation.
- f. Seek guidance from the BLM Deputy Ethics Counselor before proceeding with a proposed donation when an Authorized Employee has a personal, business, familial, or financial connection to a potential donor, and/or has other questions regarding the appropriateness of accepting or soliciting a donation that may have ethics implications.
- g. Provide pertinent information to the Office of the Solicitor and request an evaluation should the Authorized Employee have concerns.
- h. After determining to approve or decline a donation, notify the prospective donor of the decision by letter. If the donation is to be accepted, a letter of appreciation or other appropriate form of donor recognition should be sent (see Section 1.6.H. and Appendices 5 and 6).

3. What additional procedures apply to donations valued at \$250,000 or more?

- a. For donations of money (including contributed funds), products, services, and personal property valued at \$250,000 or more:
 - i. In addition to the requirements in Section 1.6.C.2. above, the Donations Senior Manager (see Section 1.4.B.) must determine whether or not to accept the proposed donation. The Authorized Employee must provide the following information to the Donations Senior Manager:
 - (a) Any conditions that may have significant implications for the BLM's budget or programs;
 - (b) If the donation has restrictive conditions, an explanation of how the donation:
 - Will benefit the BLM's mission;
 - Is consistent with program priorities; and
 - Will not divert resources from other, higher priorities.
 - (c) Assurance that the proposed donation will maintain the integrity and impartiality, and the appearance of such, of the Department's and the BLM's programs, operations, and employees, and public confidence in the Department and the BLM; and
 - (d) Supporting documentation, including a completed BLM Checklist to Determine Appropriateness of Donation (Appendix 1) and Departmental Donor Certification Form-DI 3680 (Appendix 2).
 - ii. The Donations Senior Manager:
 - (a) Will refer the proposed donation to the Washington, D.C., Office of the Solicitor for a litigation search;
 - (b) Must refer the proposed donation to the affected Assistant Director in the Washington Office as well as the Assistant Director, Business Fiscal and Information Resources Management, for review to ensure the proposed donation is consistent with the BLM's policies and budgetary priorities; and
 - (c) May request assistance from the OIG to obtain information about the donor.

- b. For donations of money/contributed funding, products, services, and personal property valued at \$1,000,000 or more:
 - i. In addition to the requirements in Sections 1.6.C.2-3., above, the Authorized Employee, through the Donations Senior Manager, must refer the proposed donation to other Interior bureaus' Donations Senior Managers for identification of any concerns.

4. Which donation situations do not require Authorized Employees to follow the procedures in Sections 1.6.C.1.-2.?

- a. If the Authorized Employee determines that the proposed donation complies with the BLM's basic acceptance considerations (see Section 1.6.C.1.) the procedures in Sections 1.6.C.1.-2. do not need to be followed if:
 - i. The donation is from a Federal, State, or local government;
 - ii. The donation is from an accredited educational institution; or
 - iii. The donation is offered during and in relation to the BLM's immediate response to a natural disaster or other emergency.

5. May the BLM accept donations with conditions?

Yes, the BLM may accept a donation with conditions, also known as a restricted donation (see Glossary of Terms). Some individuals or entities make a donation to the BLM but restrict its use by the BLM to a particular purpose or program. The policy of the BLM is to accept such donations if the condition(s) is/are consistent with the mission, programs, and laws governing the BLM, meet(s) the basic factors described in Section 1.6.C.1., and is/are otherwise legal to accept. The Authorized Employee must consult with the Office of the Solicitor regarding the legality of the condition(s). Any conditional terms should be clearly articulated in the BLM acknowledgement or acceptance letter (or other appropriate agreement instrument) with a request to the donor to confirm the BLM's understanding of the condition(s) with the Authorized Employee. Restrictions on the use of the donation should be included in BLM's statement of understanding of the terms of the donation.

D. Documentation Requirements

1. Which donation-related activities must the BLM document?

The BLM must document its donation-related activities in accordance with applicable statutes and regulations, including the Federal Records Act, the Paperwork Reduction Act, and the Privacy Act. Such documentation allows for audit or investigation by the OIG or the Government Accountability Office. The Authorized Employee must:

- a. Document the evaluation and acceptance or non-acceptance of donations of any type using the BLM Checklist to Determine Appropriateness of Donation (Appendix 1) for donations valued at \$5,000 or more and the Departmental Donor Certification Form-DI 3680 (Appendix 2) for donations valued at \$25,000 or more.
- b. Document the acceptance and receipt of monetary donations/contributed funds using the Proffer of Monetary Contribution Form 4120-9 (Appendix 3) and Project/Sub-Project Number Assignment and Information Form 1310-20 (Appendix 4).
- c. Document receipt and disposition of all real or personal property, regardless of the method or source of acquisition, in accordance with:
 - i. Interior Property Management Directives (IPMD); and
 - ii. 410 DM 1, Personal Property Management: Scope, Policies, and Responsibilities.
- d. The Authorized Employee or the unit or program office that receives a personal property donation must document receipt and disposition of the donation and (when the donation qualifies as accountable, system-controlled personal property) must submit Form DI-102 to report the item to the State/Washington Office Personal Property Manager who records the property donation in the BLM's Financial and Business Management System. (Refer to BLM Manual Section-1520 - Personal Property Management for additional information, guidelines, and requirements.)

Table 1-3 summarizes the documentation required for: 1) evaluating the appropriateness to accept a proposed donation of any type at various values, and 2) accepting and receiving monetary donations/contributed funding at various values.

Table 1-3: Documentation Required for Evaluating and Accepting Proposed Donations to the BLM*

Value of Donation	Documentation Required for Evaluating Proposed Donations of Any Type at Various Values		Documentation Required for Accepting and Receiving Monetary Donations/ Contributed Funding Only	
	Checklist to Determine Appropriateness of Donation (Appendix 1)	Departmental Donor Certification Form DI-3680 (Appendix 2)	Proffer of Monetary Contribution Form 4120-9 (Appendix 3)	Project/Sub-Project Number Assignment and Information Form 1310-20 (Appendix 4)
If the donation is: ≥ \$ 250,000** 	 Required Complete Appendix 1	 Required Complete Appendix 2	 Required Complete Appendix 3	 Required Complete Appendix 4
If the donation is: \$25,000 - \$249,999 	 Required Complete Appendix 1	 Required Complete Appendix 2	 Required Complete Appendix 3	 Required Complete Appendix 4
If the donation is: \$5,000 - \$24,999 	 Required Complete Appendix 1	 Not Required	 Required Complete Appendix 3	 Required Complete Appendix 4
If the donation is: \$250 - \$4,999 	 Required Complete Appendix 1	 Not Required	 Required Complete Appendix 3	 Required Complete Appendix 4
If the donation is: ≤ \$249 	 Not Required, but Encouraged	 Not Required	 Not Required	 Not Required

*See Section 1.6.C.4. for exceptions. When evaluating a proposed donation of any type or value, authorized employees must use the evaluation factors outlined in Section 1.6.C.1. before proceeding with the proposed donation/solicitation. For real or personal property evaluation and documentation, follow property management and real property receipt and disposition manual and handbook direction (see BLM Manual 1520 - Personal Property Management, BLM Manual 1530 - Real Property Management, and BLM Acquisition Handbook, H-2100-1).

**See Section 1.6.C.3. for additional supporting documentation required for donations valued at \$250,000 or more.

E. Accounting for Donations

1. What forms of payment may the BLM accept for monetary donations/contributed funding?

The BLM may accept monetary donations/contributed funding via cash, check, credit card, and/or electronic funds transfer (EFT).

2. How must monetary donations/contributed funding to the BLM be deposited and who may assist with this process?

- a. After an Authorized Employee has determined it is appropriate to accept a donation/contributed funding (see Section 1.6.C.), donated/contributed funding of any value received by the BLM must be placed under immediate accounting control using existing standard operating procedures for entering funds into the Collections and Billings System (CBS) using the appropriate Commodity, Subject, Action (CSA) as outlined below:

FOR RECREATION SITES:

COMMODITY:	RECREATION - MISCELLANEOUS
SUBJECT:	<name of recreation site>*
ACTION (Choose 1):	Donations

*Note: If the above Subject and Action combination do not exist in CBS, work with your CBS State Core Team Lead to have it created following the standard operating procedure in place for creating new CSAs.

FOR ALL OTHER DONATIONS/CONTRIBUTED FUNDS:

COMMODITY:	CONTRIBUTED FUNDS – ALL OTHER
SUBJECT (Choose 1):	Donations/Contributed Funds Less than \$250 Donations/Contributed Funds \$250 or More
ACTION (Choose 1):	General (no restrictions on use) Resource Restoration, Protection, and/or Stewardship Grazing Energy and Minerals Wild Horse and Burro

National Conservation Lands
 Recreation (only available if Subject Donations/
 Contributed Funds \$250 or More is selected)

Treasury Account Symbol: 14X8069.001
Fund: XXXL8069TF
Functional Area: L7XXX0000.RF0000 (There are seven of these – one for each ACTION identified above.)
WBS: To be determined (Only one WBS will be identified for donations less than \$250. An individual WBS will be created for each donation of \$250 or more.)
Posting Model: General (no restrictions on use) donations are created in FBMS using Treasury Financial Manual posting model C158:

Proprietary Entry

Debit	101000	Fund Balance with Treasury
Credit	560000	Donated Revenue – Financial Resources

Budgetary Entry

Debit	426600	Other Actual Business Type Collections from Non-Federal Sources
Credit	445000	Unapportioned Authority
Credit	462000	Unobligated Funds Exempt from Apportionment

- b. Deposits entered in the CBS will interface nightly with the Financial and Business Management System (FBMS). Once interfaced, deposited donations/contributed funding will be available for use at the four-digit cost center, five-digit functional areas, and funded program (WBS) levels.
- c. Authorized Employees who have accepted donations/contributed funding should work with their Washington Office, State, or District/Field Office administrative/budget officer for assistance with depositing monetary donations/contributed funding.

3. Which forms must be completed and where should they be uploaded to ensure monetary donations/contributed funding are deposited and recorded accurately?

To ensure that donated/contributed funding is deposited and recorded accurately, the Authorized Employee must complete the Proffer of Monetary Contribution Form-4120-9 (Appendix 3), and Project/Sub-Project Number Assignment and Information Form-1310-20 (Appendix 4), for monetary donations/contributed funding valued at \$250 or more (see Table 1-3, Section 1.6.D.) Completed forms must be uploaded to

the NOC Project Management Sharepoint Site (access to this site can be provided by contacting your state budget office).

4. What reports will be available to identify donations/contributed funding received by the BLM?

CBS Reports such as the Daily Transaction Report or the CBS Summary Transaction Statistics Report will be available to identify each transaction down to the action level.

5. May donations/contributed funding be refunded?

Donations/contributed funding should only be refunded from restricted donations or contributed funds in very limited circumstances, such as when conditions associated with the donation/contributed funding are not met. General donations should never be refunded.

6. May payroll be charged to these accounts?

Charging time for existing employees to donated/contributed funding accounts may be appropriate in some circumstances. The donation/contributed funding, whether for personnel or funding to hire personnel, must be structured such that the donated or funded personnel do not inappropriately influence Departmental or BLM regulatory actions or other decisions.

F. Donation Solicitation and Fundraising Support

1. May the BLM solicit donations?

- a. BLM employees may not solicit donations unless the Donations Senior Manager specifically authorizes them to do so in writing and only when statutorily allowed and appropriate, as determined by the Director. This general prohibition on solicitation does not apply to the Director who may solicit donations from private individuals or organizations for the BLM and its programs.
 - i. Donation boxes are not considered a solicitation. BLM Field Office/Unit/Center Managers or a BLM fundraising partner may set out donation boxes (see Section 1.6.F.3.).
- b. The Donations Senior Manager may authorize employees in writing to solicit third parties only in limited circumstances:
 - i. The written authorization must clearly describe the scope of the authorized solicitation, including how the employee may solicit for donations, the

timeframe, permissible entities that the employee may solicit, and any restrictions on the solicitation activity.

- ii. Employees must not portray Congress, the Department, or the BLM as having failed to meet their responsibilities. Employees must ensure, consistent with anti-lobbying provisions, such as those in 18 U.S.C. § 1913, that they do not make any statement or take any action that may be construed as implying that a prospective donor should contact a Federal Government official to influence that official in any way.
- iii. It is not considered a solicitation for BLM employees to provide information, as appropriate, regarding the BLM's authority and ability to accept donations in support of BLM projects and programs. As part of this activity, employees may:
 - (a) Develop lists of projects, programs, or activities that the BLM could undertake with donated support and disclose them to outside entities;
 - (b) Describe to potential donors and the public the details of BLM needs and/or how donations will be used;
 - (c) Allow the non-intrusive display and distribution of materials at BLM sites to educate visitors about a BLM partner's fundraising effort or philanthropic activity to support a BLM site, program, or activity that furthers the mission and goals of the BLM;
 - (d) Serve as a liaison to organizations that fundraise for the benefit of the BLM;
 - (e) Work with and support BLM partners (including event attendance and accompanying a partner on a donor cultivation visit as a subject-matter expert) to achieve goals, subject to any specific limitations of this policy;
 - (f) Work with partner (see Glossary of Terms) or other non-Federal entities to co-sponsor events;
 - (g) Encourage the efforts of third parties wishing to create support groups/organizations whose purposes include fundraising and providing support for the benefit of the BLM; and
 - (h) Work with non-profit organizations and others to receive donations of real property and money (including contributed funds), products, and in-kind goods and services.

2. What limits BLM Director and/or other Authorized Employees donation solicitation activities?

- a. A donation may not be solicited if the donation would not be advantageous to the BLM, or if a solicitation would present a real or apparent conflict of interest. An apparent conflict of interest is present if the acceptance would raise a question in the mind of a reasonable person, with knowledge of the relevant facts, about:
 - i. The integrity of the Department's and the BLM's programs and operations;
 - ii. The impartiality, and appearance of impartiality, of Departmental and BLM employees; or
 - iii. Public confidence in the Department's and the BLM's programs and personnel (see Section 1.6.C.1.).
- b. Donations may not be solicited from a source that:
 - i. Is a party to a contract, grant, or cooperative agreement with the BLM or is seeking to do business with the BLM;
 - ii. Has a financial interest that may be substantially affected by performance or non-performance of the BLM; or
 - iii. Is an organization involved in the direct production of alcohol, tobacco, or firearms.

3. Under what circumstances may a donation box be installed?

A BLM Field Office, Unit, or Center Manager, or BLM fundraising partner, may install a donation box on BLM-managed, -owned, -leased, or jointly-administered property if:

- a. 100 percent of the donations or collections received in the donation box will be used to benefit the BLM and programs and projects that support that administrative area of the BLM (for properties managed solely by the BLM); and
- b. The donation box or adjacent sign or kiosk clearly informs the public about how the funds will be used by the BLM and/or its partners.
 - i. Donations received from BLM donation boxes on jointly-administered property, e.g., joint visitor centers and leased facilities off public lands,

will be allocated based on a formula agreed to by the administering entities in written agreements.

- ii. Monetary donations provided in a BLM donation box must be collected and placed into a Commodity, Subject, Action (CSA) and Treasury Account, as described in Section 1.6.E.2.
- iii. Monetary donations in a BLM fundraising partner's donation box, e.g., a box installed by a Friends group or other non-profit public lands support organization, will be used by the BLM and/or partner according to the written agreement between the BLM and partner organization.

The BLM may authorize the placement of a fundraising partner's donation box (e.g., box installed by a Friends group or other non-profit public lands support group on public lands through a written agreement).

4. May other entities solicit donations or fundraise for the BLM's benefit?

- a. Yes, non-profit organizations, such as Friends groups (see Glossary of Terms) or other site-based partner support groups and land protection organizations, may solicit donations or fundraise on the BLM's behalf or to support their activities and programs that benefit the BLM.. Although the BLM does not directly regulate the conduct of fundraising by third parties, fundraising conducted in the BLM's name is appropriate only when consistent with the BLM's mission and goals and the standards described in this policy. When any fundraising entity seeks to raise funds on behalf of the BLM, the intentions and expectations of the fundraising entity and the donors must align with those of the Department and the BLM. These intentions and expectations must be documented in a fundraising agreement, except as specified in Section 1.6.F.8.
- b. In addition, Congress occasionally charters non-profit partner organizations or recognizes the role of an existing non-profit partner through legislation. In 2017, Congress established the Bureau of Land Management Foundation (BLM Foundation) in the Consolidated Appropriations Act of 2017 (Consolidated Appropriations Act, 2017, Pub. L. No. 115-31, tit. I, div. G, § 122, 131 Stat. 135). The BLM Foundation may solicit donations and fundraise on the BLM's behalf. As mandated by the legislation, the purposes of the BLM Foundation are:
 - i. To encourage, accept, and administer private gifts of money, real and personal property; and in-kind services for the benefit of, or in connection with the activities and services of, the BLM;

- ii. To carry out activities that advance the purposes for which public land is administered;
- iii. To carry out and encourage educational, technical, scientific, and other assistance or activities that support the mission of the BLM; and
- iv. Assist the BLM with challenges that could be better addressed with the support of a foundation, including reclamation and conservation activities, activities relating to wild free roaming horses and burros, and the stewardship of cultural, historic, and archaeological resources on public land.

5. What types of fundraising activities are not permitted on BLM-managed property?

Fundraising that does not support a BLM site, program, or project as outlined in a fundraising agreement or that fails to further the BLM mission is not permitted.

6. When is a written fundraising agreement needed?

- a. Except in limited circumstances (see Section 1.6.F.8.), the BLM may not accept donations raised for BLM benefit without a written fundraising agreement. The agreement, which may vary in format and substance, must be completed and signed by both parties before the non-Federal entity begins fundraising.

A memorandum of understanding (MOU) or other appropriate agreement may be used to describe the overall goals and objectives between the BLM and a partner. In instances when an MOU or other appropriate agreement already exists, fundraising agreements may tier off those agreements as is needed.

- b. In the agreement the fundraiser must state explicitly that they are seeking financial or other resources for the BLM's benefit. For example:
 - i. A local civic group raising funds for a new trail on a nearby BLM unit must have a fundraising agreement in place before sending out solicitation letters.
 - ii. A non-profit conservation group that comes onto a BLM unit to solicit funds for a project to benefit that unit must complete a fundraising agreement.
- c. An agreement may be written for a short-term effort or may broadly cover a long-term relationship encompassing many fundraising activities.

7. What information must be included in a written fundraising agreement?

- a. Fundraising agreements may vary in format and substance, but should enable the BLM and a fundraising partner to identify and describe fundraising objectives, plans, and schedules; minimize overlap with other fundraising efforts; and ensure fundraising complies with BLM policy. The agreement must require those fundraising for the BLM's benefit to conduct themselves in a manner that reflects well on the integrity and impartiality of the Department and the BLM and public confidence in the Department's and the BLM's programs and personnel.
- b. The fundraising agreement must contain, at a minimum, the following information:
 - i. The fundraising objectives and timeframe;
 - ii. Descriptions of the roles BLM employees may have in the fundraising campaign;
 - iii. The Authorized Employee's name, title, and contact information, and the name, title, and contact information for the fundraising non-Federal entity;
 - iv. A requirement that the Authorized Employee provide written approval of any informational and fundraising materials before distribution or communication to the public;
 - v. A description of how the entity will account for all funds raised;
 - vi. A clause that allows the BLM to terminate the agreement at its discretion and without cost;
 - vii. A clause prohibiting actions that imply that the BLM endorses the business, products, or services of donors or supports actions that are inconsistent with the Department's donations policy or this policy;
 - viii. A description of how prospective donors must be reviewed;
 - ix. Plans for how the donor and/or donation will be recognized;
 - x. Descriptions of how contingencies, such as cost overruns, dissolution of assets, if necessary, will be addressed; and
 - xi. Frequency of reporting, what to report, and who gets the report, will be addressed.

8. When is a written fundraising agreement not required?

The BLM does not require a written fundraising agreement in the following situations:

- a. For events that are local or community-based, are locally publicized, and are not expected to raise more than \$25,000 on behalf of the BLM. Authorized Employees must still consider the totality of circumstances before accepting donations from small-scale events. Examples of local events include:
 - i. A wildlife festival;
 - ii. A silent auction;
 - iii. A benefit dinner; or
 - iv. A request from a local service club to a grocery store, restaurant, or other type of vendor for an in-kind donation of consumable goods, such as snacks and garbage bags, for use in the club's volunteer maintenance efforts on BLM-managed property.
- b. For most Friends group fundraising activities. The BLM does not require a written fundraising agreement for a Friends group if an individual Friends Group Partnership Agreement is in place that clearly identifies fundraising activities it will conduct to carry out its mission to support a BLM site, facility, or program (e.g., sales outlets). An agreement is required if the Friends group leads a specific fundraising effort on the BLM's behalf intended to raise more than \$25,000 (e.g., larger, more complex projects, such as capital campaigns, endowments).

G. Donor Recognition**1. How does the BLM recognize donors?**

- a. Acknowledging and recognizing donor support is important. Donors who contribute to the BLM directly or through a fundraising partner should receive appropriate, reasonable recognition and thanks from the BLM, the BLM's fundraising partner(s), or both. Consider various methods, such as:
 - i. Thank-you letters (see Appendices 5-6);
 - ii. Publicity, e.g., news releases to traditional and digital media outlets, such as newspapers, magazines, radio, television, websites, and social media;
 - iii. Events, e.g., media events, award presentations/programs, press announcements, photo opportunities, annual meetings, conferences, other

recognition activities that acknowledge or involve a donor, and flyers associated with these events;

- iv. Temporary displays, signs and/or banners, e.g., Adopt-a-Trail signs, or other temporary signage/items or portable exhibits at construction, restoration, or other sites when directly related to the project for which the donation was made;
 - v. Awards, e.g., a nomination for an appropriate BLM or non-BLM award;
 - vi. Certificates, acknowledgment plaques or nameplates, donor boards and walls, donor books, and similar items; and
 - vii. Short, discrete, unobtrusive publicly displayed acknowledgements of credit, showing the donor's name on/in interpretive and digital media, such as, temporary exhibits, waysides, audiovisual productions, and printed materials, e.g., *"This exhibit made possible by a generous donation from ..."*, *"Sponsored by...on Behalf of the Bureau of Land Management"*.
- b. When determining the best means of recognition, Authorized Employees must consider the appearance associated with the particular donation and whether the cost of the recognition is a proper expenditure of appropriations.
 - c. Donor recognition that includes donor logos or name scripts as part of a credit line is allowable on items that are temporary, e.g., publications/printed material, temporary signs, BLM special event banners/materials, video/film/electronic material, etc., provided that the size, scale, scope and location of recognition is subtle and does not dominate an item or an area or event facility. The manner of any on-site recognition should not compete for attention with, or draw attention away from, the BLM site's purpose or natural, cultural, and/or other resources.
 - d. Donor recognition in the form of name scripts and logos is prohibited on BLM vehicles, e.g., snowmobiles, all-terrain vehicles, boats, motor vehicles. Recognition may not include specific product names, slogans, or advertisements so as to ensure that there is not commercialization of the public lands. The BLM must not recognize a donation in a way that implies endorsement of the donor's products, services, or activities (other than the actual donation itself).
 - e. For any donations received valued at \$250 or more, the BLM should, at a minimum, acknowledge the donation by preparing and issuing a letter of acceptance and appreciation from the BLM (see Appendix 6).

- f. When a donor considers its donation to a group fundraising effort for the BLM's benefit as a donation to the BLM, it is appropriate for the fundraising partner and the BLM to express appreciation consistent with BLM policy.

Glossary of Terms

-A-

Authorized Employee. A BLM employee as listed in Table 1-1 and Table 1-2 (see Section 1.6.C.) who may accept a particular donation and who is responsible for ensuring that the BLM and Departmental donations policies are adhered to when evaluating donors and donations to the BLM. Authorized employees must have sufficient experience, training, and organizational responsibility to be able to consider fully all relevant factors and circumstances when evaluating prospective donations.

-D-

Donation. Something of value received by the BLM from a non-federal source without consideration or an exchange of value and accepted under the FLPMA (43 U.S.C. § 1737, Section 307), or other applicable authority. Types of donations may include money/contributed funding, real and personal property, or in-kind goods or services, depending upon the scope of the statute authorizing the BLM to accept something of value. A donation may have conditions or restrictions on how it may be used or may be for general purposes (unrestricted). A donation of land or interest in land, for example, may come with conditions that restrict how the BLM uses the property (see Donation with Conditions, below).

Donation with Conditions. A donation with conditions – sometimes called a restricted donation or contributed funding – that may only be used for a specific purpose designated by the donor, or a donation of land or interest in land that includes restrictions on the type of use or access (e.g., a reservation of hunting rights or no hunting, no development, no vehicular access or access reserved to the donor, timbering or no timbering).

Donations Senior Manager. The BLM employee responsible for overseeing the BLM's donation-related activities; ensuring compliance with the Department's donations policy (374 DM 6) and this policy; and reviewing and determining the appropriateness of specific donations (valued at \$250,000 or more) as identified in the Department's donations policy and this policy. The BLM's Donations Senior Manager is the Assistant Director, National Conservation Lands and Community Partnerships. See Section 1.4.B. for a detailed list of responsibilities.

-F-

Friends Group. A private, independent, 501(c)(3) nonprofit organization formed and managed primarily by local citizen volunteers to assist and support the purposes and objectives of a BLM site, facility, or program.

Fundraising. Seeking donations of money/contributed funding, goods, or services, for the benefit of the BLM. The term applies to partner support groups (e.g., Friends organizations) that generate funds for the benefit of the BLM.

-N-

Name Script. A distinctive type style that is part of an organization's brand and identity.

-P-

Partner. An umbrella, generic term that refers to individuals, organizations, agencies, tribes, and/or other entities that are in a relationship (partnership) with the BLM to achieve goals common to both the partner and the BLM.

Partnership. A voluntary and mutually beneficial collaborative relationship between the BLM and one or more partners. It is built on the contributions of each partner and formed to achieve, or to assist in achieving, a common goal.

Personal Property. Any owned asset other than land. The distinguishing factor between personal property and real property is that personal property is movable (not fixed permanently to one location as with land or buildings). Examples of tangible personal property include museum collections, vehicles, furniture, boats, collectibles, and works of art. Examples of intangible personal property include property that cannot be physically handled, such as stocks, trust fund accounts, etc.

Phased Donation. A donation accepted over a period of years. To obtain tax benefits, donors often phase their donation over several years. This is still considered one donation.

-R-

Real Property. Land or interests in land, and generally whatever is erected or growing upon or fixed to land.

-S-

Solicitation. Any request by a BLM Authorized Employee to a non-Federal entity, group, or individual, for donations to be made to the BLM in support of its programs or activities.

Appendix 1 – BLM Checklist to Determine Appropriateness of Donation**DONATION INFORMATION**

Prospective Donor Name: _____

Amount/Value of Donation: _____

Type of Donation: ☐ Money/Contributed Funding ☐ Real Property ☐ Personal Property
 ☐ Services ☐ Products

Intended BLM Office Recipient: _____

ACCEPTANCE FACTORS FOR CONSIDERATION**Category: Maintaining the integrity of the Department's and BLM's programs and operations**

1. Does self-certification by the donor - for donations valued at \$25,000 or more - reveal any questions or concerns that would make acceptance of this donation questionable?
2. Is the donation, or does the donation appear to be, an attempt to influence regulatory or other Departmental or BLM authority?
3. Does the donation fail to meet a legitimate Departmental or BLM need?
4. Does the donation require a funding commitment that is not currently available or anticipated?
5. Does the donation fail to promote and enhance the BLM's mission, an individual program, or unit?
6. Does the donation circumvent law, regulation, or policy?
7. Is the BLM likely to have difficulty properly using or managing any donated real property (including land or land interests) or personal property within policy, programmatic, and management goals?
8. Are any conditions on the donation inconsistent with authorized purposes or any relevant BLM policy or planning documents?
9. Will the donation be used by the donor to state or imply endorsement or promotion by the Department or the BLM of the donor or the donor's product or services?

No (Appropriate)		Yes or Maybe* (Not Appropriate)
No	N/A	Yes/Maybe

10. Does the donation consist of personnel or funding to hire new or additional permanent BLM employees?*

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Category: Maintaining the impartiality and appearance of impartiality of Departmental and BLM employees

- Does the amount of the proposed donation appear to influence any pending Departmental or BLM decision or action involving the donor's interests?
- Is there either an actual or an implied commitment by the Department or BLM to take an action favorable to the donor in exchange for the donation?
- Is the donor (or its officers or directors) involved in litigation or other disputes with the Department, BLM, or other Departmental bureaus or offices?
- Is the donor seeking a permit, license, or other approval from the BLM?
- Is the donor otherwise engaged in any type of business relationship with the BLM?
- Will the donor obtain, or appear to obtain, preferential treatment in dealing with the Department or BLM?

No (Appropriate)	Yes or Maybe*

Category: Maintaining public confidence in the Department and BLM, its programs, and its personnel

- Would accepting the donation be likely to cause substantial public controversy?
- Does the donation consist of goods or services not needed by the BLM?
- Are any conditions on the donation inconsistent with BLM policy, goals, or programs?

No (Appropriate)	Yes or Maybe*

*Attach an explanation for any "yes" or "maybe" responses. A "yes" or "maybe" response to any of the factors for consideration may not individually trigger a decision to decline a proposed donation, but each illustrates what Authorized Employees must ask when evaluating the totality of circumstances and making donation-related decisions. Authorized Employees must seek guidance from the Deputy Ethics Counselor and/or the Office of the Solicitor to resolve issues associated with particular donations whenever the circumstances are unclear or questionable.

**Charging time for existing employees to donated funding accounts may be appropriate in some circumstances. The donation, whether for personnel or funding to hire personnel, must be structured such that the donated or funded personnel do not inappropriately influence Departmental or BLM regulatory actions or significant decisions.

AUTHORIZED EMPLOYEE

Completed By: _____
Print Name, Title, and Location of BLM Authorized Employee

Signature: _____
BLM Authorized Employee

Date
Rel. No.1-1801
11/19/2019

Appendix 2 – Departmental Donor Certification Form

U.S. Department of the Interior
Donor Certification Form

DI-3680
OMB Control No. 1090-0009

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

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

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

1. I _____ am / _____ am not involved in litigation or other controversy with the Department or its bureaus.
2. I _____ am / _____ am not seeking or otherwise engaged in any type of financial or business relationship with the Department, for example, a contract, permit, lease, grant, or cooperative agreement.
3. I _____ have / _____ have not been debarred, suspended, proposed for debarment, excluded or disqualified under the nonprocurement common rule, or otherwise declared ineligible from doing business with any Federal government agency.
4. This donation _____ is / _____ is not expected to be involved with marketing or advertising.
5. I _____ am / _____ am not seeking to attach condition(s) to this donation.
6. This donation _____ is / _____ is not part of a series of donations to the Department or its bureaus.

For any affirmative answers above, please attach explanations. Please also identify any other circumstances not addressed in the above questions that may affect the Department's decision to accept your donation.

With my signature I hereby certify the above statements are accurate and attest that I am not aware of other issues regarding this donation that may be of concern to the Department. I also certify that this donation is not intended to influence any decision or action by the Department or to obtain any special treatment from the Department. I understand that the Department's acceptance of this donation does not constitute endorsement by the Department of me or my products or services.

Signature	Printed Name	Date
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Organization		E-mail address
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City State Zip Daytime or Work Phone
Information collected via this form will be handled in accordance with the requirements of the Privacy Act and the Freedom of Information Act to attempt to ensure the greatest protection of personal privacy. Please see Notices pertaining to this Form on Page 2.

NOTICES

PRINCIPAL PURPOSE: This information is collected to support the Department's policy that in accepting donations, the Department maintains its integrity and impartiality, and the confidence of the public by providing the donor the opportunity to certify certain basic information related to the gift.

EFFECT OF NOT PROVIDING THIS FORM: Submission of the form is completely voluntary, but not providing it may delay consideration of your proposed gift to the Department as it will make it more difficult for the Department to determine the context of the gift. Submitting the form does not entitle the respondent to any benefit.

AUTHORITY: The authority for collecting this information may be found at 9 Stat. at L. 395, Ch. 108, at, 18 U.S.C. § 201, and at 374 Departmental Manual Chapter 6.

PAPERWORK REDUCTION ACT NOTICE: The Paperwork Reduction Act of 1995 requires us to inform you that: the Department of the Interior, or one of its bureaus or offices, collects the information requested on this form pursuant to a proposal of a donor to proffer a gift to the Department or one of its bureaus or offices valued at least \$25,000. The Department, bureau or office will evaluate the certification regarding your proposed gift to support its policy of ensuring integrity and impartiality in the fulfillment of its missions. This Information Collection has been approved by the Office of Management and Budget (OMB), and the currently valid OMB Control Number and Expiration Date appears on the upper right corner of Page 1 of the Form. No Federal agency may request or sponsor, and you are not required to respond to, a request for information which does not contain a currently valid OMB Control Number.

BURDEN HOURS STATEMENT: The public burden for this form is estimated at 20 minutes per response including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to: U.S. Department of the Interior, Office of the Secretary, Bureau Information Collection Clearance Officer, 1951 Constitution Avenue, N.W., (MS 116 SIB), Washington, D.C. 20240. Note – comments, names and addresses of commentators are available for public review during regular business hours. If you wish us to withhold this information, you must state this prominently at the beginning of your comment. We will honor your request to the extent allowable by law.

Appendix 3 – Proffer of Monetary Contribution FormForm 4120-9
(October 1989)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

PROFFER OF MONETARY CONTRIBUTION

State	Office _____
Project Number Assigned	_____
Project Number Assigned	_____
INSTRUCTIONS	
Submit one copy to each contributor, Field Office grazing case file, and Field Office project file.	

I. Name(s)	Address(es) (include zip code)

do hereby contribute the sum of \$ _____ to the Bureau of Land Management. Contributions are made under the provisions of Section 9 of the Taylor Grazing Act (43 U.S.C. 315h), as amended, and Section 307(c) of the Federal Land Policy and Management Act (43 U.S.C. 1737). Specifically this contribution is for the purpose of *

II. The unexpended balance, if any, remaining after completion of the work described in the paragraph above shall be: Returned to the contributor(s) Used for general purposes*	III. Contribution, made payable to the Bureau of Land Management, is attached in the form of (<i>specify check, money order, etc.</i>)
Signature of Contributor	Title (as applicable)
Signature of Contributor	Title (as applicable)
	Date

MS 1105 – Donations, Fundraising, and Solicitation Policy (Public)

A3-2

Signature of Contributor	Title <i>(as applicable)</i>	Date
Signature of Contributor	Title <i>(as applicable)</i>	Date
Signature of Contributor	Title <i>(as applicable)</i>	Date

Accepted in behalf of the Secretary of the Interior for deposit in the Treasury of the United States and for expenditure for the purpose specified herein

Signature of Authorized Officer	Title	Date
*Contributions for general purposes are accepted to help pay for the expenses of construction or application of conservation and range improvement projects in general, including project planning and design if so specified, or for the payment of expenses incident to the administration, use, protection, and improvement of lands in the district where this contribution is received. Such contributions shall not be used for specific administrative purposes, such as the payment of salaries of named individuals or positions, or the performance of specific functions by such individuals, or the maintenance of offices at particular locations unless approved by the Director. The contribution shall not be used for any purpose at variance with existing Bureau policy, regulation, or law regarding the development, conservation, and use of the public lands.		

Appendix 4 – Project/Sub-Project Number Assignment and Information Form

FORM 1310-20

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

PROJECT/SUBPROJECT NUMBER ASSIGNMENT AND INFORMATION FORM

SEE INSTRUCTIONS ON NEXT PAGE									
1. Submission: ☐ Original ☐ Revision		2. Functional Area		3. WBS Project		4. Subproject Number:		5. Real Property Number or Asset class:	
6. Case File Number:		7. Submission Date:		8. Project Name:				9. Capital Asset or Land Purchase?	
				Subproject Name:				☐ Yes ☐ No	
10. Description of Project: T									
11. Applicant/Vendor's Name:									
Applicant's Address:									
Applicant's Phone Number:									
12. Organization Code of Lead Office Cost Center:									
13. Cost Centers of Other Offices Charging to the Project/Subproject:									
14a. Estimated Start Date:		14b. Estimated Completion Date:		15. Estimated Project Total Cost:			16. Estimated Actual Authority on State Reimbursable:		
17. Project Manager's Name:									
Project Manager's Phone Number:									
Project Manager's Organization Code:									
Field Office Contact:									
Field Office Phone Number:									
TRUST FUND PROJECTS (Program 7122) MAY BE AUTHORIZED AN INDIRECT COST RATE OTHER THAN THE ANNUAL PREVAILING RATE									
18. Exception Indirect Cost Rate:			%			19. Under the authority of:			
20. Approving Officer's Name (Print):									
21. Approving Officer's Signature:									
22. Title:							Date:		
FOR NATIONAL BUSINESS CENTER OC-612 USE ONLY									
23. Tables:			☐ PROJ DEFINITION ☐ WBS ☐ Sales Order ☐ DI-1040						

MS 1105 – Donations, Solicitation, and Fundraising Policy (Public)

A4-2

24. Customer Number:			
25. Agreement Number:			
26. Sales Order Document Number:			
27. Property Asset Reviewed by: Input by:		Date:	__ / __ / __

28 Retained by: requesting Office, State/Washington Office Budget, National Operation Center

Appendix 5 – Sample Letter to a Monetary Donor

(NOTE: This is an example of a letter to a donor after the donor has been fully evaluated under the BLM’s Donations, Fundraising, and Solicitation Policy and approved as a donor to the BLM.)

Date
Donor Name
Donor Organization Name
Donor Street Address
City, State ZIP

Dear (Donor Name):

Thank you for your interest in donating to the Bureau of Land Management’s (BLM) environmental and heritage education programs to engage young people in learning and stewardship on public lands. BLM’s education programs, publications, and other materials help motivate young people and their families to visit BLM sites and enhance their awareness of BLM’s natural and cultural resource management mission. Your generous donation will enable the BLM to increase opportunities for youth to participate in BLM education programs and activities.

To make your donation to the BLM, please complete and sign the attached Proffer of Monetary Contribution Form (4120-9) and mail it with your donation check or money order, made payable to the Bureau of Land Management, to the address below. Please include your contact telephone number and email address so that we may confirm receipt.

Bureau of Land Management-(name of BLM office)
(BLM street address)
Attention: (name of authorized employee)
City, State ZIP

The Bureau of Land Management (BLM) is accepting your gift consistent with its donations policy (MS-1105) with the mutual understanding that your voluntary donation is not intended to influence any decision or action by the BLM, nor to obtain any special treatment or consideration from the BLM. Additionally, accepting your donation does not constitute an endorsement by the BLM of (name of donor), its products, or its services.

Should you have any questions about the BLM’s education programs or the mechanics of making your donation to the BLM, please contact (name of program lead), at (phone number) or (Email).

Again, thank you for your valuable support.

Sincerely,

(name and title of authorized employee)

cc: Any appropriate Washington, State, or Field Offices

Enclosure

1 - Proffer of Monetary Contribution Form (4120-9) (1 p)

Appendix 6 – Sample Letter of Donor Appreciation

Date
Donor Name
Donor Organization Name
Donor Street Address
City, State ZIP

Dear (donor name):

Thank you for your generous donation of (cite money/contributed funding amount, acreage of land, or other donation) on (date).

This donation will enable us to (describe specific project that the donation will benefit or fund and state the BLM's understanding of the terms of the donation should it have conditions. If it is a land donation, describe how it will be used, e.g., as exchange land to acquire land within an approved project boundary; as a key acquisition for a particular BLM site, or other program land; etc.).

The Bureau of Land Management (BLM) is accepting your gift consistent with our donations policy (MS-1105) with the mutual understanding that your voluntary donation is not intended to influence any decision or action by the BLM, nor to obtain any special treatment or consideration from the BLM. Additionally, accepting your donation does not constitute an endorsement by the BLM of (name of donor), its products, or its services.

We sincerely appreciate your gift to the Bureau of Land Management.

Sincerely,

(name and title of authorized employee)

cc: Any appropriate Washington, State, or Field Offices