



**Superintendent's Order # 32**

# Donor Recognition Plan

Effective Date of this Order:	May 1, 2013
Review By:	May 1, 2016
Revision Dates:	12/8/08, 11/14/08, 2/26/07,
Supersedes:	N/A
For More Information, Contact:	Superintendent
Reviewed/Concurred By:	<input checked="" type="checkbox"/> Chief, Planning & RM <input checked="" type="checkbox"/> Chief, Interp/Education <input checked="" type="checkbox"/> Chief, Business Services <input checked="" type="checkbox"/> Chief, Protection <input checked="" type="checkbox"/> Chief, Facility Mgmt
Additional Review and Concurrence By:	<input checked="" type="checkbox"/> NPS Midwest Regional Director (2008 version) <input checked="" type="checkbox"/> President, Friends of the Apostle Islands National Lakeshore <input checked="" type="checkbox"/> Chairman, National Parks of Lake Superior Foundation
Approved:	<p style="text-align: center;">_____/s/_____ Robert J. Krumenaker, Superintendent</p>

## Background and Purpose

The National Park Service (NPS) recognizes private philanthropy as both a noble tradition of the national parks and as a vital element of the Service's success. Donations come to the NPS from individuals, organizations, foundations, corporations, businesses, and other entities, purely as expressions of support, in response to the donor's awareness of needs, or as a result of an organized fundraising campaign by others. These funds and in-kind contributions enhance the NPS's ability to carry out its programs and activities. The NPS appreciates the generosity of those who donate directly, and those who work through authorized non-profit organizations and other authorized individuals or entities to raise funds for the benefit of the National Park System or the programs of the National Park Service.

The Director of the NPS issues policies that serve as the framework for NPS employees' conduct in relation to donation activities and fundraising campaigns which benefit the NPS. These policies can be found in [Director's Order 21 \(DO-21\): Donations and Fundraising](#). Donor Recognition Plans are required for all parks or programs that receive or are likely to receive donations.

Apostle Islands National Lakeshore (APIS) its authorized non-profit partners (authorized partners), the Friends of the Apostle Islands National Lakeshore (Friends)<sup>1</sup> and the National Parks of Lake Superior Foundation (NPLSF)<sup>2</sup>, regularly receive offers of donations and desire to

<sup>1</sup> Authorized by General and Fundraising Agreement Number G6140-05-0033, through 11/11/2015.

<sup>2</sup> Authorized by General and Fundraising Agreement Number G6310M0001 with Apostle Islands National Lakeshore, Grand Portage National Monument, Isle Royale National Park, Keweenaw National Historical Park, and Pictured Rocks National Lakeshore, through 01/26/2017.

accept donations and appropriately recognize donors for their support of the mission of APIS, Friends, and NPLSF. Due to the collaborative nature under which the park and its authorized partners operate, this Donor Recognition Plan (Plan), which is consistent with *DO-21*, was developed cooperatively and will be used by both APIS and its authorized partners. Changes to the Plan will be made, whenever possible, with the full participation and agreement of the authorized partners. These guidelines balance the need to express appropriate and equitable acknowledgement of donors with the need to protect the values and purposes of the National Park Service (NPS).

The financial needs of APIS and its authorized partners are diverse and include, but are not limited to, the desire for donations in the categories of capital, operations, endowment, property (real and personal), and programming, as well as special event/program sponsors. For the purposes of this Plan, the term *donation* includes cash and non-cash gifts and refers to something of value received from an outside source without consideration or an exchange of value. Funds or other items received as a result of a competitively awarded grant from a foundation are also covered by the term donation. Grants that are governmental in nature are not included in the scope of this plan. A *sponsor* is a donor who provides a substantial portion of the funding for an authorized event or program. Event sponsors typically receive publicity such as banners and signs at the event as well as prominent mention in printed materials and event advertisements. Recognition of special event sponsors is specifically discussed in this Plan.

Because this Plan is an extension of *DO-21*, there are several references to particular sections of that document. The reader of this Plan should also be knowledgeable of the contents of *DO-21*.

This plan will be reviewed every three years and updated as necessary.

## Donor/Donation Review, Approval, and Acceptance

While the support received through donations can be very important to the successful accomplishment of aspects of the NPS mission, donations *must* be made in a legally and ethically appropriate manner. When accepting a donation, it is important that APIS and its authorized partners weigh the totality of the circumstances surrounding the potential donation. In other words, the acceptance of the donation must 1) maintain the integrity of NPS and the Department of the Interior's (DOI) programs and operations; 2) maintain the impartiality, as well as the appearance of impartiality, of NPS and DOI, and of NPS and DOI employees; and 3) maintain public confidence in the NPS, DOI, and their programs and employees.

Since Friends and NPLSF are the authorized fundraising partners of APIS, donors will often make a donation to Friends or NPLSF, which is subsequently donated to APIS. APIS recognizes that it has no authority to directly regulate the fundraising or donation activities of Friends or NPLSF. Nevertheless, where fundraising is conducted in the name of, or for the benefit of, APIS or the NPS, it is imperative that the integrity of the NPS/APIS mission and its donors be maintained. Violating this integrity could be cause for the NPS to terminate its relationship with an authorized partner.

Before accepting a donation, APIS and its authorized partners will refer to the specific “Donations” guidance outlined in *DO-21* (Section 6.0 – 6.1.4). On a project-specific basis, additional fund-raising documents will be prepared when required. APIS and its authorized partners reserve the right to decline any gift for any reason.

APIS will not accept any donation, even from Friends or NPLSF, that in the judgment of the park Superintendent, violates or appears to violate, the specific ethics and integrity provisions of *DO-21* or the ethics and integrity provisions of federal law, regulation, or policy. No donation will be accepted from the park concessioner, any company or organization under a Commercial Use Authorization (CUA)<sup>3</sup>, or any current Use and Occupancy holder unless there is a clear, unambiguous, written disclaimer from the donor that no consideration will be expected or accepted by the donor, *and* APIS and its authorized partner (as appropriate) weigh the likelihood, as well as the perception, of conflict-of-interest and determine them to be of no significance. Donations from organizations with overlapping ownership or management with the park concessioner or any CUA or SUP holder, or from individuals or organizations closely associated with Use and Occupancy holders, will be subject to the same scrutiny to assure that the donation does not result in a real or apparent conflict of interest.

## Donor Recognition

### Thank You Letters

All donations accepted on behalf of APIS or its authorized partners will be acknowledged in writing by the respective recipient; for APIS, the Superintendent; and for Friends and NPLSF, the President and Chairman, or their designees. Friends and NPLSF will notify the Superintendent of any donations with a value of \$1000 or more. Most contributions to one of the authorized partners are commingled with other funds and lose their identity when conveyed to APIS and therefore will not normally receive an additional thank you letter from the Superintendent. On occasion, however, funds received and acknowledged by one of the park’s authorized partners are earmarked, (i.e. held distinct from other donated or operating funds) due to the conditions on the donation or some other factor. When earmarked donations are conveyed to APIS from one of its authorized partners, the Superintendent will acknowledge the gift made through the partner in writing to the donor directly, with a copy to the President or Chairman of the partner organization. The only exception will be in circumstances where the donor requests anonymity.

Acknowledgement letters from the Superintendent will normally be drafted by the park program manager responsible for the program the donation will support. These letters should be written as soon as possible after the donation is received. The letter should identify the type of donation (if cash, the amount), reiterate any conditions of the donation which the park agrees to, and thank the donor.

### Additional Types Of Recognition

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<sup>3</sup> Or Special Use Permit (SUP), for non-profit organizations that run authorized trips at APIS.

In addition to thank you letters, APIS and/or its authorized partners may choose to recognize a donor through press releases, media photo opportunities, mementos, certificates, an article or listing in either the APIS or authorized partner's newsletter, annual report, or website, and/or event recognition, as appropriate, subject to donor approval. Partners may also provide premiums in recognition of donations above certain thresholds. In some cases, certain types of recognition are a condition of APIS or Friends and NPLSF receiving a donation. In those cases, appropriate recognition will take place through one or more of the options listed below.

## **Donor Recognition Board**

APIS and its authorized partners believe it is fitting and appropriate that there be a single location in the park where generous donors are publicly recognized in a systematic and on-going manner. This will serve as both a tangible and visible record of philanthropic support for the park, and an expression of APIS, Friends, and NPLSF appreciation for such support.

A Donor Recognition Board or equivalent display will be established and located in one of the foyers of the park's Visitor Center on the mainland, since it is the primary visitor point of contact. Approved donor recognition may include the donor name, the year, and when appropriate, the type of project donation. *Corporate name scripts and logos will not be used on the Donor Recognition Board.* Anonymity will be respected and only those donors wishing to be recognized will be acknowledged.

The Donor Recognition Board will utilize a format that allows recognition of donors by the placement of name plates or other markers that can be added or removed with relative ease, or the simple redesign and replacement of the entire display on an as-needed basis.

Some donor recognition displays emphasize the amount of a donor's contribution, or display the names of more generous donors in larger type or for a longer period of time. All donations are truly important to Apostle Islands National Lakeshore, however. Even while we are acknowledging our appreciation for donations, it is important to preserve the integrity and impartiality of the public trust. Hence the APIS Donor Recognition Board will be designed to thank all donors above a threshold (\$500 in cash or equivalent value) equally, and normally for a one to two year period in the year following the donation. This threshold will be reviewed and revised as needed. The Donor Recognition Board may be combined with a Volunteer Recognition Board.

Other types of recognition may be added to the Donor Recognition Board at the discretion of the Superintendent as the need arises to acknowledge major financial contributions to the park (e.g. endowments, lifetime gifts, planned gifts, bequests. etc.).

## **Bulletin Boards And Interpretive Signs**

When a significant donation is received that supports a park program in the field, the Superintendent may authorize the acknowledgement of the donation on a park bulletin board (for a short term program) or a park interpretive sign (for a long-term or permanent enhancement to the park or its programs). See section on Credit Lines for additional guidance. For example: in

recognition of the donation of funding to support a ranger at Meyers Beach, the following message was posted on the Meyers Beach Bulletin Board:

The Friends of the Apostle Islands National Lakeshore...

...was created to help promote an appreciation for and to help preserve the cultural and natural heritage of the Apostle Islands. Their goals include:

- Connect people with the history, beauty, and adventure of the Apostle Islands National Lakeshore.
- Increase community involvement with the islands.
- Support the educational, recreational, and resource protection efforts of the National Park Service.
- Raise funds to support park projects and events.

Funds raised by the "Friends" cover the costs of a park ranger and a Student Conservation Association intern stationed at Meyers Beach in summer 2006. The National Park Service gratefully acknowledges this gift.

## Memorials

A donation given "in memory of" or "in honor of" an individual(s) will be recognized in the same way as other contributions. Memorial plaques, headstones, or monuments will not be placed in the park except as authorized by Chapter 9.6 of NPS [Management Policies 2006](#).

## Benches, Trees, Or Other Plantings

At the discretion of the Superintendent and consistent with park needs, donations of benches, trees, or other plantings may be accepted. APIS will determine the most appropriate location for these items, which will generally be placed in developed areas of the park (and *never*, for benches, in designated wilderness) unless the donation is to support the park's ecological restoration efforts in the backcountry. Recognition for a donated bench, tree, or planting will occur at the Donor Recognition Board in the park Visitor Center, or on a park Bulletin Board near the donated item, not on the item itself, subject to the guidelines noted elsewhere in this plan.

## Site-Specific Donor Recognition For Approved Capital Projects

In addition to being recognized on the Donor Recognition Board, it is possible that some donors may be recognized in other ways at the site of the capital project.

Long-term recognition: Recognition of capital contributions for preservation, rehabilitation, or construction of park buildings/structures or sites may be provided by donor recognition plaques or on-site donor boards, when circumstances warrant, as determined by the Superintendent. Generally, it will be desirable to focus donor recognition for capital projects at the Donor Recognition Board in the Visitor Center. However, when on-site recognition is a key factor in successful project accomplishment, and after careful review the Superintendent determines that the additional recognition is appropriate and consistent with NPS policy and *DO-21*, donors may be acknowledged both at the project location and the Donor Recognition Board. The duration and kind of on-site donor recognition (i.e. displaying a recognition plaque stating that the work done on the building was "made possible through a generous donation from XYZ") will be considered on a case-by-case basis and will be agreed to in writing in advance of the donation.

Plaques or other donor recognition treatment will *not* be affixed to the historic fabric of cultural resources, placed in natural zones, or otherwise be placed where they would intrude on the character of the area.

Short-term recognition: During project fundraising, construction, and for a limited time following project completion, temporary, on-site, signs may be used by APIS and its authorized partners (subject to APIS approval) to recognize donors involved in specific capital improvement or rehabilitation projects. APIS, Friends, or NPLSF will be responsible for creating the temporary sign, which will be attractively done, describe the project, acknowledge donors, and not intrude on the visitor experience. Donor name scripts and business logos *may* be included as part of the recognition provided they amount to short, discrete, unobtrusive donor credit lines at the end of the information on the sign. The level of donation required for temporary, on-site recognition will be determined on a case-by-case basis, depending on the total cost and duration of the project.

### **Credit Lines, Logos, And Name Script**

Brochure or other printed material: A donor name script or logo may be included as part of the recognition provided it amounts to a short, discrete, unobtrusive donor credit line at the end of the material. For example, the credit line on a park brochure may state: “This brochure was made possible through the contribution of <logo, name script, or name>”.

Electronic material (video, film, etc.): The donor recognition may appear either at the beginning of the presentation or at the end. However, the use of digital on-screen graphics or “bugs” are not permissible forms of donor recognition. In the case of computerized information kiosks or other electronic displays to be placed in visitor service areas, the credit line containing the donor name script or logo may appear either at the beginning of the presentation or at the end. The recognition may not appear on the kiosk casing itself.

Physical items that remain in the park: Except as noted elsewhere, donor recognition will not normally be permitted on other donated or donor funded items, interpretive waysides, recreation equipment, and other items that remain in the park.

Boats, motor vehicles, clothing, or equipment: No donor recognition will be allowed on any of these items used by the NPS or its employees in the performance of their duties.

Advertising and marketing slogans and tag lines: These may not appear under any circumstances.

## **Special Events in Apostle Islands National Lakeshore**

The primary guidance for holding special events (or “special park uses”) is found in [Director’s Order 53 \(DO 53\): Special Park Uses](#). *DO-21* applies to NPS donor or partner recognition at such events.

Special events fall into two categories; non-NPS events allowed under special park use permit, and events wholly or partially sponsored by the NPS. In either case, *the Superintendent will not allow recognition that suggests commercialization of APIS*. However, the Superintendent may recognize business sponsors by limited use of logos and name script on event facilities, signs and literature at such special events provided that the size, scale, scope and location of business logos and name script does not dominate the event facilities or area. Events may not be “named” for sponsoring business entities, as in “XYZ Corp. Heritage Festival”.

### **NPS Sponsored and Co-sponsored Events**

For officially-sponsored NPS events, the name of the event must predominate. At these events, the NPS may provide appropriate recognition provided that business names are not used in any way that would imply or suggest NPS endorsement of a product or company, or be construed as commercial solicitation or advertising. The purpose of such recognition is to acknowledge the sponsor. To ensure against the appearance of endorsement, pre-event written agreements must spell out the responsibilities of the parties and any conditions on the offering or acceptance of the gift and should include provisions specifying the amount, type, and size of sponsor recognition signs. These provisions may be included in a special park use permit, an exchange of letters, or other written documentation.

On-site notices (e.g. banners) must be appropriate to the character and scale of the event. Such notices may be displayed for a period of time in advance of the event to encourage public attendance. Banners *must not* have text such as “XYZ Company Clean Up the Park Day” or “Clean Up the Park Day Sponsored by XYZ Company.”

Sponsors may be permitted to establish a temporary hospitality area for sponsored special events, subject to all applicable food safety regulations and policies.

Distribution of free products or sample products is permitted at events co-sponsored by NPS only if the items directly relate to the purpose of the event (e.g. plastic bags for a clean-up day) or are consumable at the event. The items may be imprinted with the name of the event and recognize sponsors by name (using name script if desired), logo, and website address.

### **Non-NPS Events**

Guidance on this topic is found in *Director’s Order 53 on Special Park Uses*. It is worth repeating a salient directive here from *DO-53: The National Park Service will not permit the public staging of special events that are conducted primarily for the material or financial benefit of the organizers or participants, or which involve commercialization or in-park advertising or publicity*. Notices on temporary displays directly associated with the event containing sponsors’ names, logos, or name script may be placed in close proximity to the event in both time and location. Banners *must not* have text such as “XYZ Company Clean Up the Park Day” or “Clean Up the Park Day Sponsored by XYZ Company” or in any way imply NPS involvement or endorsement of the event.

Distribution of free products or sample products to park visitors or others is not permitted at non-NPS events.

## **Membership Drives and Fundraising in the Park**<sup>4</sup>

Authorized fundraising partners *can* hold membership drives in parks, *can* solicit funds, and *can* collect the membership fees and contact information during the drive under certain conditions approved by the Park Superintendent. [36 CFR §2.37](#) allows solicitation in parks provided that the activity is expressly authorized in one of the following three kinds of Special Park Use permits: Special Events ([36 CFR §2.50](#)), Demonstrations ([36 CFR §2.51](#)), or Sale or Distribution of Printed Matter ([36 CFR §2.52](#)). Each permit must clearly state that the permittee may not provide donors or new members with goods in exchange for, or in association with, their donation or membership. In other words, no cups, hats, t-shirts, or similar material, may be distributed by permittees in parks. This restriction is necessary to ensure compliance with laws governing the sale of merchandise in parks.

Similarly, authorized fundraising partners *can* raise funds or solicit donations in the park, again provided that the activity is expressly authorized in one of the three kinds of Special Park Use permits described in the preceding paragraph.

At Apostle Islands, these kinds of activities, when approved, will typically be authorized with a Special Park Use permit for Special Events.

## **Prohibited Recognition**

### **Naming of Park Features or Facilities**

The naming of natural or cultural features, park facilities, recreational resources, or rooms will not be used to recognize monetary contributions or other donations to APIS, Friends and NPLSF, or the NPS. (See [36 CFR §2.62](#) (Memorialization) and [NPS Management Policies](#) 9.6.)

### **Special Consideration**

Donors will not receive special consideration regarding any law, regulation, or policy affecting public use of the park. This includes application for Special Use Permits, and the prohibitions and limitations on in-park advertising.

### **Endorsement**

Acceptance of private support by APIS or Friends or NPLSF is not and should not be interpreted as an endorsement of that donor, or any product or programs associated with that donor. Federal employees are prohibited from using or permitting the use of their position, title, or authority to endorse any service, product, or enterprise. This prohibition does not prevent APIS or its authorized partners from acknowledging the assistance provided by a donor and how that assistance has benefited the park.

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<sup>4</sup> Guidance provided in email from Midwest Regional partnership Coordinator Diane Keith to APIS Superintendent Bob Krumenaker, January 4, 2013.

# Use of the NPS Arrowhead or Images of NPS Staff in Uniform by the Donor

These uses are strictly regulated by federal law, regulation, and NPS policy. For additional guidance, see: [36 CFR §11](#)

[Director's Order 52D \(DO 52D\): Use of the Arrowhead Symbol](#)  
[NPS and its Partners: Graphic Identity Framework](#)

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	<p>United States Department of the Interior National Park Service Midwest Region 601 Riverfront Drive Omaha, Nebraska 68102-1276</p>	
F5415(MWR/P)		February 2016
<p>Memorandum</p> <p>To: Superintendent, Apostle Islands</p> <p>From: Regional Director, Midwest Region</p> <p>Subject: Donor Recognition Plan</p> <p>We have reviewed the park's Donor Recognition Plan and find it to be complete and consistent with Director's Order 21. By this correspondence, I am approving the plan as submitted on February 14. You are cleared to execute the document. I would like to have a copy on file in the office, so please forward an executed photocopy to Assistant Regional Director Partnerships Marty Sterkel.</p> <p>The park staff, partners, and you are to be commended for the documents straightforward approach and the consultation efforts made in developing the plan. Thank you for your dedicated efforts in fulfilling the mission of the National Park Service.</p> <p></p> <p><b>TAKE PRIDE IN AMERICA</b> </p>		



United States Department of the Interior

National Park Service  
Midwest Region  
601 Riverfront Drive  
Omaha, Nebraska 68102-4226



15415(MWR-P)

DEC 6 2000

Memorandum

To: Superintendent, Apostle Islands  
From: Regional Director, Midwest Region  
Subject: Donor Recognition Plan

We have reviewed the park's Donor Recognition Plan and find it to be complete and consistent with Director's Order 21. By this correspondence, I am concurring with approval of the version of the plan dated February 26 which we have a copy of in our file. Please update to the current date and you are authorized to execute the document. Please submit a photocopy of the executed plan to MWR Partnership Coordinator Mike Pflaum.

You are to be commended for your work in developing the plan. Thank you for your dedicated efforts in fulfilling the mission of the National Park Service.

