



Comments on Draft Director's Order #20 Concerning National Park Service Policies and Procedures Governing Agreements

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Alma Ripps
Chief, Office of Policy
National Park Service
1849 C St NW
Washington, DC 20240

Joshua Wilks
Deputy Bureau Financial Assistance Chief
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Dear Ms. Ripps and Mr. Wilks:

The mission of Public Lands Alliance (PLA) is to connect, strengthen, and represent the nonprofit partners of America's public lands. Our members include philanthropic partners, cooperating associations, conservation corps, outdoor schools, and trails groups that partner with the National Park Service (NPS). Most of these relationships are codified through subject- or activity-specific agreements, cooperative agreements, and/or cooperative management agreements.

PLA congratulates the NPS on proposing a thorough revision of Director's Order #20 (DO20). Since its last significant update in 1999, DO20 has not kept pace with the practices used by the NPS and its many federal and non-federal partners to enter an array of agreements. PLA believes this update better reflects how agreements are used today. We are hopeful that an updated Reference Manual will bring even greater clarity to NPS partners regarding the roles, responsibilities, and expectations for their partnerships.

After a careful review, PLA respectfully recommends that you address one additional issue prior to publishing a final policy. NPS leadership has recently stated that "Outdoor Schools in National Parks (formerly referred to as Residential Environmental Learning Centers) are vital partners in delivering the education mission of the National Park Service" and PLA could not agree more (Memorandum 6.A.1:2450: Cooperative Agreements and Annual Work Plan Guidance and Implementation for Outdoor Schools in National Parks). Outdoor Schools are most often 501(c)(3) non-profit, educational partners and in most cases are managed via

cooperative agreements. A recent review of all financial assistance agreements with Outdoor Schools determined that a cooperative agreement is also the preferred instrument for the NPS and Outdoor Schools to formalize their partnerships.

Therefore, PLA believes that Outdoor Schools deserve recognition in DO20 alongside other important 501(c)(3) partners like philanthropic partners and cooperating associations (for example, see Lines 370-372, "For example, Director's Order #21 and RM-21 contain guidance and agreement templates for philanthropic partnerships, and Director's Order #32 and RM-32 contain guidance for standard cooperating association agreements").

To achieve this result, we recommend:

4.3.7 Examples of Appropriate Uses of this Agreement Type

Page 8, Lines 281-286

Add "Outdoor Schools in National Parks Agreements" to this list.

and / or

5.1 Director's Orders with Specific Agreement Types or Other Legal Instruments

Page 14, Lines 490-491

Revise the description of "Director's Order #6: Interpretation & Education Services Agreements" to state "guidance for agreements on Outdoor Schools in National Parks and other interpretive and educational partnerships."

PLA will submit the above comments through the NPS Microsoft Office Comment Form to ease your review process.

On behalf of our membership, thank you for the opportunity to comment on this important revision. Please contact Shawn Swearingen, PLA's Director of Government Relations, if you have specific questions regarding our submission.

Warm regards,



Dan Puskar
President and CEO