



# United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, D.C. 20240

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IN REPLY REFER TO:

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## Memorandum

To: Regional Concession Chiefs  
Park Superintendents with Concession Operations

From: Chief, Commercial Services Program *J. A. Pendry*

Subject: Guest Donations, Concessioner Donation Activities, and Tipping Practices

In response to a number of recent inquiries, the following reminders and clarifications are provided regarding donation-related activities and tipping practices at concession facilities.

### **Guest Donation Program**

In accordance with the National Park Service (NPS) Director's Order (DO) #21, Donations and Fundraising and the Guest Donation Program Operating Procedures, if a lodging concessioner is participating in the program, guests must be "advised of the \$1 guest donation charge on their bill, its benefits, and how to opt out at each of the following contact points: at check-in; through written materials in the guest room; and at check-out." Disclosure practices must also be established for non-lodging services where the program is in place. Concession specialists should confirm that these disclosures are being made.

### **Other Donation Activities Involving Concessioners**

*Donation Boxes.* Donation boxes may be set up by a park in NPS concessioner-assigned areas. The donation collection must be for an "authorized fundraising partner" such as the park friends group. The activity must be approved by the park superintendent and must be conducted in accordance with DO #21. Placement and concessioner responsibilities regarding care of donation boxes should be in accordance with the concessioner operating plan and should not impact the concessioner's ability to conduct business. Any box and signage should be professional in appearance, consistent with facility decor, and unobtrusive.

*Donations to Other Organizations.* Collection of donations for organizations other than authorized partners (e.g., charities, conservation groups, or organizations supporting a social cause) is not an authorized concessioner activity.

Donation activities in a park *may* be authorized for such organizations under a special use permit issued in accordance with DO #53, Special Park Uses. For example, a health-related organization might conduct a fitness run in a park under a special use permit and have a

dedicated location set up to request donations during the event. When permitted activities involve concessioner operations or concessioner-assigned facilities, the activities must not place any financial or service obligations on the concessioner nor adversely affect their ability to do business.

*Donations in the "Back-of-the-House."* Donations to charitable organizations, organizations supporting social causes, and for individuals (e.g., sick employees) may occur internally among concessioner personnel pursuant to the concessioner's corporate policies. Solicitations for such donations may not be extended to visitors.

*Donation of Merchandise.* The donation of merchandise to a concessioner for the purpose of free distribution to visitors as a means to promote the organization's cause is not permitted. For example, a concessioner may not accept candy bars or post cards from a non-profit organization seeking to display and distribute these items free at the concessioner's retail shop.

Concessioners *may* accept free or reduced-price merchandise from a vendor that may be sold or provided as a promotional give-away. Such practices are common within the hospitality sector for marketing purposes. For example, a vendor may provide free samples of deodorant as a convenience item at a concession shop which the concessioner may give away or sell at a reduced price. Special recognition of the supplier providing such discounted materials or services is prohibited. Prices to customers for such items must be set in accordance with the Commercial Services Rate Administration Guide.

### **Tipping Practices**

*Tip Jars.* The use of tip jars is common within the hospitality sector, particularly for services such as snack and beverage bars and tour operations. The use of tip jars at concession facilities is allowable if such practices are approved by the park superintendent. The location, size, and style of such containers and associated signage should be professional in appearance, consistent with facility decor, and unobtrusive.

*Asking for Tips.* Concessioners may solicit tips where it is standard industry practice (e.g., services to provide horse and mule rides, tours, and charter fishing). These solicitation practices may include the use of discreet signs and requests as part of talks before and at the end of the activity. These tip practices are subject to superintendent approval.

Approved tipping practices and procedures must be documented in the concessioner's operating plan. Park staff are to periodically review these tip practices to ensure compliance. Accounting practices for the employee distribution of such tips must be in accordance with Federal, State, and local regulations.

### **Further Information**

If you have any questions or comments on this matter, please contact Kurt Rausch in the WASO Commercial Services Program at Kurt\_Rausch@nps.gov or 202/513-7202.