

Sample Letter to House Committee on Government Oversight and Reform

Date, 2013

The Honorable _____
U.S. House of Representatives
Washington, D.C. 20515

Dear _____

I am writing to express my/our deep concern over changes to the Combined Federal Campaign (CFC) in a proposed rulemaking by the Office of Personnel Management (OPM). These changes, if implemented, unnecessarily place more centralized control of the CFC with OPM essentially creating a larger bureaucracy for the sake of alleged efficiencies. It is our view and that of experts that this will drastically reduce donations to charities in our community and our ability to help those most in need. We seek your assistance, in halting these proposed changes.

Optional: [Include a paragraph about your charity and the work you do and any history or relationship between your organization and the representative and his/her priorities. Stress the services you provide and specific ways in which you are helping people in the community.]

As you know the CFC is the largest and most successful workplace giving program in the world. For more than 50 years, the CFC has been a model of success. In 2012, \$260 Million was raised for charities. The campaign has raised \$7 Billion since its inception. As a charity participating in the CFC, we count on the unrestricted funds we receive to provide local services in our community/in communities nationwide. Yet despite this success, OPM is proposing changes that would essentially decimate the campaign.

On April 8, 2013, OPM issued a proposed rule (78 FR 20820) that would result in drastic changes to the CFC. These changes focus on the broadest concept of efficiency, not fundraising, and would disproportionately harm charities and eliminate vital services to your community.

We are particularly concerned about the following elements of OPM's proposed rule:

- OPM has proposed eliminating paper pledges which currently represent 78% of giving, and cash/check contributions, which currently represent 10% of giving or \$27 Million nationwide. Further, It's important to note that many federal employees – particularly armed forces, Postal Service employees and others who do not have access to computers in the jobs – use these traditional methods of giving. These would be eliminated and, therefore, CFC giving would drop dramatically.
- OPM's proposed changes include the introduction of an upfront fee that would increase administrative burdens and costs for my organization and other charities that receive CFC funding. The unfair and unprecedented upfront fee – which

despite requests, OPM has yet to disclose the amount or any further detail - is discriminatory and counter to the intent of the campaign.

- OPM proposes replacing some 180 locally run campaigns with a Washington-based campaign managed by OPM. This change would dramatically reduce the role of local employees and eliminate local oversight. For 50 years, CFC has relied on local volunteers, locally present charities and other local resources. a. The proposed changes go in the opposite direction, put Washington in complete control, and eliminate the heart and soul of the campaign which are local volunteers and local communication.
- Although OPM wants to centrally manage this campaign, it has no experience in charitable fund raising, managing fund-raising professionals, developing a central processing website and does not have the capacity to evaluate the more than 25,000 charity applications that the CFC processes annually. Many are concerned that OPM will use fees from charities, which it has already programmed into its FY2015 budget, to supplement its funding for CFC operations. This is wrong and places additional cost and administrative burdens on benefitting charities.
- While OPM has proposed some changes recommended by the CFC-50 Commission, which was established by the agency in 2011 to ensure the program's continued success, it appears to have only advanced recommendations that help OPM centralize control and shift more burden to participating charities. The Commission's primary role was to revitalize the campaign not make it a larger more unwieldy bureaucracy.
- Despite proposing the most wide-ranging changes in the CFC's 50-year history, OPM has provided scant details on how these changes will be implemented or the real reasons why the changes are being proposed. For example, no details have been provided about the new "upfront fee" or how and when the proposed technology infrastructure will be built. Every request to OPM for detail has been met with a refusal to comment until the process is complete.

We plan on entering our formal response to the proposed rule in the Federal Register by the June 7 deadline. However, we are very concerned that OPM, has already made its decision and will not seriously consider the calls for rethinking these ill-conceived recommendations.

Thank you for seriously considering our concerns. We believe it is poor public policy for the federal government to knowingly make changes in the CFC that will undoubtedly result in less funds raised for charities, increase the burden on those charities and provide fewer opportunities for federal employees to engage in philanthropy.

We are prepared to connect you with experts who have been in communication with OPM and have testified to the CFC50 Commission about these issues. Otherwise we trust you will look into this very serious situation and take appropriate action to prevent these rules for taking effect.

[Optional] We would appreciate the opportunity to meet with you and your staff to discuss these proposed changes and how we can ensure that they do not harm the charitable community and those we serve. I will contact your office presently to discuss,

but please feel free to contact me at the address and phone number below if I can provide any additional information.

Regards,

(first name) (last name)
(title)
(organization)