



America's Charities' Summary Submission to the Federal Register on May 3, 2013

America's Charities' full response to proposed regulatory changes to the Combined Federal Campaign (CFC) (RIN: 3206-AM68) is submitted as an attachment below.

The CFC is the most successful employee workplace giving program in the world. While OPM should be acknowledged for recognizing the need for revitalization, we believe a number of the proposed changes will result in dramatic drops in giving and participation.

While our full response cites recommendations we view as positive, highlighted below is a summary of our major concerns:

- **Imposition of an upfront, non-refundable, variable application fee lacking detail on structure and amount**

The rules would now require charities to essentially "pay to play". This places an unfair administrative burden and risk on charities and provides less transparency to donors. We recommend maintaining the current system of deducting campaign costs before those dollars are distributed to charities and instead focusing on oversight of local campaigns.

- **The elimination of local campaign structure in favor of centralized bureaucracies at a regional level**

This would eliminate much of the local engagement and ownership vital to successful campaigns. OPM should instead focus its most stringent oversight on the largest CFC markets. They may also turn to retired federal workers who, for a small stipend, could be trained and certified to assist and ensure adherence to campaign rules.

- **An over-reliance on technology and other changes in campaign operations that will result in dramatic drop in participation and giving**

While we strongly endorse the expansion of online giving and other technology options for federal donors, we strongly recommend retaining current giving options. OPM should look for ways to grow the campaign including looking to experts in the private sector on employee engagement and loyalty as well as working to engage younger workers and working to create an organized, sustainable program to engage Federal retirees.