

Back to the Drawing Board!

***An Analysis and Recommended Responses to the
Proposed Changes to the
Combined Federal Campaign (CFC) Regulations***

by Bill Huddleston, The CFC Coach

Introduction

My name is Bill Huddleston, and I have an extensive background with the CFC in both Federal and non-profit roles and I have significant concerns about proposed changes to the regulations that govern the Combined Federal Campaign (CFC).

I believe that as proposed, they will cause great harm to the CFC, especially small non-profits, whether local or national, and in many instances the proposed regulations are either in direct contradiction or ignore the testimony presented during the CFC-50 Commission Open Meetings, or include massive changes to the CFC operations that were never discussed in the open meetings, and thus no one had a chance to address these issues.

I know that Congressman Davis and Congresswoman Byron did an excellent job of chairing the CFC-50 Commission, but the many of the regulations proposed by OPM either ignore the work of the CFC-50 Commission, or go far beyond what was discussed in the CFC-50 Open Meetings. The charge to the CFC-50 Commission was to work on ways to improve the CFC for its next 50 years, not to destroy it, which is what the proposed regulations will do, if implemented.

What follows are a brief primer on how the CFC is currently organized and structured, and then a section by section analysis of the proposed regulations, along with what I recommend as the recommended action, which in many cases is to have OPM go ***“Back to the Drawing Board!”***

In addition to this document, I have created open groups on Facebook and LinkedIn, named SAVETHECFC as a place for people to comment and share information about the proposed changes to the CFC and the impact that they would have.

Bill Huddleston

The CFC Coach

MPA in Nonprofit Management, George Mason University

Why Does the CFC Matter?

Why Does OPM Want to Kill the Golden Goose of American Philanthropy?

Background on Combined Federal Campaign and the proposed changes to the CFC regulations

In order to help people understand how massive and far-reaching the proposed changes are to the current structure and methods of the CFC, this is a brief synopsis of the current structure, plus some background on the work of the CFC-50 Commission, which was established by OPM in 2011 and issued its recommendations for improvements to the CFC in July, 2012.

The Combined Federal Campaign (CFC) matters because through it, and the generosity of the hundreds of thousands of Federal public servants who are the CFC donors, millions of Americans and others throughout the world are helped by the actions and services provided by the more than 25,000 non-profits that are enrolled in the Combined Federal Campaign. In the fall 2012 campaign, more than \$258 million dollars were raised, and in terms of actual giving, if the CFC were a foundation, it would be the 14th largest foundation in the USA. Over the past five years, the CFC has generated more than \$1 billion of unrestricted revenue for thousands of local, national and international CFC charities, which makes it the single largest source of unrestricted funds in the non-profit sector.

The CFC, which was established in 1960, is the federal government's workplace giving program, and is administered by the Office of

Personnel Management (OPM). The CFC used to have both a vision statement and their mission statement on the CFC Operations home page that were succinct and inspiring:

CFC Vision Statement:

A government that encourages and enables active employee participation in community and that fosters collaboration with business and the nonprofit sector to achieve this goal.

CFC Mission Statement:

To promote and support philanthropy through a program that is employee focused, cost-efficient, and effective in providing all federal employees the opportunity to improve the quality of life for all.

Sometime in the last decade, OPM removed the vision statement, and they seem to have forgotten what the mission statement really means, having just completed an analysis of the proposed changes to the Combined Federal Campaign regulations, that are massive and harmful to the CFC if implemented as proposed, but let's first look at the present setup.

Workplace giving is a unique type of fundraising in the non-profit sector, and it's important to understand the complex synergy that exists among all the parts. In the current structure of Combined Federal Campaign, these are the major components:

- **Recipients of services from CFC charities** - the people and other beneficiaries of the services provided by the 25,000 CFC charities. (Millions of people).

Back to the Drawing Board! - An Analysis of the Proposed Changes to the Combined Federal Campaign (CFC) Regulations – by Bill Huddleston, The CFC Coach

- **CFC Donors** -The Federal Public Servants who are the CFC Donors (more than 800,000).
- **CFC Charities** - The 25,000 non-profits that are enrolled in the CFC, including approximately 1500 that are national or international in scope, and about 22,000 local charities.
- **Federations** – Federations are special types of CFC charities, consisting of groups of 15 or more charities with something in common, e.g. the member of Community Health Charities federation are all health related, EarthShare has environmentally oriented non-profits as its members, and the members of Children’s Charities of America deal with issues affecting children to mention just a few. Federations can be national, international or local. Federations assist their members with their CFC applications, provide joint marketing support, and provide other campaign related services.
- **U.S. Federal agencies** , that conduct the CFC campaigns, and this means anywhere in the world where there is a US Federal installation, (including places like Afghanistan and Iraq) there is a CFC campaign, as well as all civilian, military and U.S. Postal service facilities in the U.S.
- **CFC Campaign Volunteers** - The thousands of Federal employees who volunteer each year to help run their agency’s CFC campaign, solicit funds, organize charity fairs, and conduct the overall management of a campaign within a Federal agency.
- CFCs are organized regionally, and currently there are 184 CFC regions:
 - **Local Federal Coordinating Committee (LFCC)** Each region has a Federal “Board of Directors” called the LFCC that is responsible for reviewing and approving applications for local charities to enroll in the CFC; and it is responsible for the selection of the Principal Combined Fund Organization (PCFO) which are contractors to the government and there is a one to one match, so currently there are 184 PCFOs.
 - **Principal Combined Fund Organization (PCFO)** has two major responsibilities: the overall management of the CFC campaign in its region; and the fiduciary responsibility of sending the CFC donors gifts to the CFC charities they designated. PCFOs are 501(c) (3) non-profits. In the 184 regions, the PCFOs in the larger areas (e.g. major metropolitan areas, and areas with large Federal installations (e.g. Army, Navy, Marine, Air Force, Veteran Affairs hospitals, Postal Service regional centers, etc.), have larger staffs than in the more sparsely populated regions.
- **Office of Personnel Management (OPM)** has overall responsibility for the Combined Federal Campaign, including the CFC regulations and any appeals from non-profits that had their applications denied. The OPM CFC office has a small staff of less than twenty. It approves the applications of national and international charities, which currently number about 1500.

Back to the Drawing Board! - An Analysis of the Proposed Changes to the Combined Federal Campaign (CFC) Regulations – by Bill Huddleston, The CFC Coach

- **Federal Executive Boards (FEB) and Federal Executive Associations (FEAs).** In areas outside of the Washington DC area, regional entities responsible for regional government wide operations, and often have the LFCC function as part of their responsibilities.
- **CFC-50 Commission** On the occasion of the 50th Anniversary of the CFC in 2011, there was a special commission formed that was chaired by two respected former Congressmen, the Hon. Tom Davis (R) from Virginia and the Hon. Beverly Byron (D) from Maryland, each of whom had experience with the government reform committee when in Congress. The CFC-50 Commission conducted a series of open meetings, and issued a final report in July 2012 that contained 24 recommendations to OPM on ways to improve the CFC. Videos of the open meetings are available on YouTube, go to opm.gov/cfc and choose the CFC-50 heading to get to the links to the videos.
- **Federal Retirees:** Retirees currently cannot have CFC designations deducted from their retirement pay, although the projections are that thousands of Federal retirees would participate in the CFC if they could.

CFC – The Golden Goose of American Philanthropy

When I give workshop presentations about the CFC, my workshop title is: “CFC—The Golden Goose of American Philanthropy.” I use that title because, just like the farmer in that fairy tale, most people do not understand how the CFC works; they just know it produces money for their non-profit, if they know anything at all about it. Depending upon

their non-profit, it may produce a lot, or it may produce a little, and non-profit leaders are often not sure how it works, and what if anything they can do to improve their CFC results. But just like the golden goose, the fundamental fact about the CFC is that it does work, and works well. I’m not saying that it can’t be improved, but in the “results oriented” culture of today, the CFC, as it is currently structured, produces results that help millions of people every year, having generated \$258 million in 2012. And in a miracle of government function, it actually has less red tape than almost any grant.

The synergy that exists among the component parts that I outlined means that in the current, decentralized structure, the workload is spread out among many different players, and that there are benefits to all.

Massive Proposed Changes to CFC Regulations by OPM

The Office of Personnel Management has proposed sweeping, and massive changes to the regulations governing the Combined Federal Campaign, and even though they say that they basing the proposed changes on the CFC-50 report; in many cases what they’re proposing was never discussed; or goes far beyond what was discussed in the CFC-50 Open Meetings and Final Report; or ignores what the CFC-50 Report recommended.

The proposed regulations are an odd combination of massive overreach; destruction of hundreds of private sector non-profit jobs in lieu of new Federal positions (which have not been approved or budgeted); hiding important sections in illogical sections of the proposed regulations, while simultaneously making multi-million dollar errors in the same section (in the section dealing with Federal retirees);

Back to the Drawing Board! - An Analysis of the Proposed Changes to the Combined Federal Campaign (CFC) Regulations – by Bill Huddleston, The CFC Coach

making small irritating changes that are harmful to the CFC donors information gathering and make things harder for both the donor and the CFC charities; the destruction of multiple business models that have been successful for decades without adequate discussion, and there are a few good ideas thrown in as well. In many areas the proposed regulations are contradictory with significant differences about what the stated purpose is, and what the actual effect will be.

As proposed, the regulations are:

- Harmful to CFC charities, both large and small, and will definitely drive smaller charities whether local, national, or international out of the CFC.
- Harmful to CFC donors
- Harmful to CFC Federations
- Harmful to Federal agencies, including the leadership development of their workforce
- Harmful to the non-profit employees of the PCFOs, where all 184 private sector organizations are eliminated which means that at least 450 non-profit jobs now go to Federal positions.
- Harmful to the beneficiaries of the services provided by the CFC charities. When just one of the items in the proposed regulations has been tried at the municipal or state level (going all electronic) there has been 50% drops in revenue. If the regulations are implemented as proposed, a 75% drop in revenues is likely.
- Presume a massive transfer of functions from the private sector, non-profit PCFO workforce to the Federal workforce.

Hidden Regulations – Federal Retirees Section

Some of the proposed regulations are poorly organized, with no logic behind them, and they have the effect of hiding significant and important changes. For example, the section dealing with Federal retirees instead of being in a “Donors” section is hidden in the “establishing Regional Committees” section, ignores the CFC-50 Commission recommendations, and makes a multi-million dollar error in judgment, all in less than a paragraph. Here’s the link to the section that deals with retirees, hidden in the phrase “and also eliminates restriction on soliciting non-Federal personnel.” [950.103 Establishing Regional Coordinating Committees.](#)

I have posted my analysis of the proposed CFC Regulations on the CFCTreasures.wordpress .com site and on the SAVETHECFC LinkedIn and Facebook Groups. To make it easier to follow the impact of the proposed regulations, the analysis contains the OPM proposed regulation, the OPM analysis, my analysis, and recommended actions in a table form.

Federal Government Public Comment Period Closes June 7, 2013.

This is the bad news, the good news is that these are ***proposed*** regulations, and we are in the Public Comment Period, which closes June 7, 2013. By law Federal agencies must put out proposed regulations for public comment, and they must respond to all issues raised before implementing the regulations. This is your opportunity to affect public policy in a meaningful way, and to stop the regulations from being implemented as proposed. The overall message is that the regulations as proposed are harmful, and OPM needs to go back to the drawing board.

Back to the Drawing Board! - An Analysis of the Proposed Changes to the Combined Federal Campaign (CFC) Regulations – by Bill Huddleston, The CFC Coach

There are two ways to comment: Send a written letter to the OPM's Director of the Combined Federal Campaign, Keith Willingham or submit your comments via the electronic comment function of the Federal Register.

Subject: RIN 3206-AM68, Solicitation of Federal Civilian and Uniformed Service Personnel for Contributions to Private Voluntary Organizations

Reference Number: RIN 3206-AM68

Dates: ***OPM must receive comments on or before June 7, 2013***

Here are the links to the proposed changes to the CFC regulations.

URL: <https://www.federalregister.gov/articles/2013/04/08/2013-08017/solicitation-of-federal-civilian-and-uniformed-service-personnel-for-contributions-to-private>

Shorter URL: <https://federalregister.gov/a/2013-08017>

HERE IS THE SPECIFIC PAGE TO COMMENT ON THE PROPOSED CFC REGULATIONS:

<http://www.regulations.gov/#!docketDetail;rpp=100;so=DESC;sb=docId;po=0;D=OPM-2013-0006>



About the Author:

Bill Huddleston shows non-profits how to get the most out of the Combined Federal Campaign (CFC), including how to use it to generate unrestricted funds, and how to use workplace giving as an integral part of the non-profit's leadership development program. He is the author of many articles on workplace giving and leadership development. His blog is at www.cfctreasures.wordpress.com.

Bill earned his MPA in Non-Profit Management from George Mason University, served in the Federal sector, and has worked extensively in the non-profit world as well. In his Federal career he served in many CFC roles including deputy campaign manager, communications chairperson, special events chair, and Loaned Executive. He specializes in creating information resources about the CFC, and he also presents lectures to university audiences on non-profit management and fund-raising. Bill is on the faculties of the Foundation Center and the Center for Nonprofit Advancement in Washington, D.C.

Contact info for Bill Huddleston:

If you have questions or concerns about how you can help save the CFC as one of the most useful programs for millions of Americans who benefit from the \$258 million dollars generated annually by the CFC, please don't hesitate to contact me at BillHuddleston@verizon.net or by phone at 703-434-9780.

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<p>Solicitation of Federal Civilian and Uniformed Service Personnel for Contributions to Private Voluntary Organizations</p> <p>Docket ID: OPM-2013-0006 Agency: Office of Personnel Management (OPM) Parent Agency: Summary: The United States Office of Personnel Management (OPM) is issuing a proposed rule to amend the Combined Federal Campaign (CFC) regulations in order to strengthen the integrity, streamline the operation, and increase the effectiveness of the program to ensure its continued success.</p> <p>RIN: 3206-AM68</p> <p>Impacts and Effects: None CFR Citation: 5 CFR 950 Priority: Substantive, Nonsignificant</p> <p>http://www.regulations.gov/#!docketDetail;D=OPM-2013-0006</p>	<p>SUPPLEMENTARY INFORMATION Publication Date: Monday, April 08, 2013 Agency: Office of Personnel Management Dates: OPM must receive comments on or before June 7, 2013. Comments Close: 06/07/2013 Entry Type: Proposed Rule Action: Proposed rule. Document Citation: 78 FR 20820 Page: 20820 -20832 (13 pages) CFR: 5 CFR 950 RIN: 3206-AM68 Document Number: 2013-08017 Shorter URL: https://federalregister.gov/a/2013-08017</p>	<p>Analysis by Bill Huddleston, The CFC Coach, MPA in Non-profit Management.</p> <p>CFC Experience: Donor Anonymous Donor Keeper of CFC statistics for commanding General Keyworker Charity Fair Chair Communications Chair Deputy Campaign Manager Recipient – CFC Directors Award Loaned Executive during the 9/11 CFC Campaign Year</p> <p>CFC Consultant to non-profits Author/Speaker about CFC, workplace giving and leadership development.</p> <p>Please note the OPM’s analysis of the “Impact and Effects” of massive changes to the Combined Federal Campaign as “None”.</p>	<p>Recommendations/ comments: <i>(not mutually exclusive).</i></p> <p>Back to The Drawing Board!</p> <p>Concur/keep</p> <p>Good idea</p> <p>Harms CFC Charities</p> <p>Not addressed</p> <p>No opinion</p> <p>Needs to be addressed.</p> <p>Needs more public discussion</p> <p>Reject/ Bad Idea</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<p>This proposed rule would replace the current regulations for the CFC. OPM proposes these new regulations to govern the solicitation of Federal civilian and uniformed services personnel at the workplace. These proposed regulations are issued under the authority delegated to OPM by Executive Order 12353 (March 23, 1982), 47 FR 12785 (Mar. 25, 1982), as amended by Executive Order 12404 (February 10, 1983), 48 FR 6685 (Feb. 15, 1983).</p> <p>In 2011, the CFC celebrated its 50th anniversary. In connection with this landmark anniversary, OPM announced the formation of the CFC-50 Commission. The Commission, formed under the Federal Advisory Committee Act, was asked to study ways to streamline and improve the program; improve accountability, increase transparency and accessibility and make it more affordable.</p> <p>The Commission delivered its report to the OPM Director on July 20, 2012. The report contained 24 recommendations for improvement in the following areas: donor participation, CFC infrastructure, and standards of accountability and transparency.</p> <p>OPM has reviewed these recommendations. This proposed rule reflects changes that OPM has concluded will improve the CFC, based on its experience administering the program and its considered judgment.</p>		<p>The proposed changes to the CFC regulations will have the effect of destroying the equilibrium that exists in the CFC among all the parties concerned, including Federal agencies, CFC donors, CFC charities, private sector workers for the non-profit CFC contractors who are the PCFOs in 184 regions, and most importantly, the people that receive the services provided by the CFC charities. If implemented they will cause a precipitous drop in revenue and many non-profits will be forced out of the CFC.</p> <p>When just one factor has been attempted (to go to all electronic giving) in municipal and state workplace giving campaigns, there has been a 50% drop in revenues.</p> <p>The massive shift from private sector non-profit functions to government functions and workforce needs much more discussion, and given the nature</p>	

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		of current Federal budget issues, a reality check. There are some good ideas included as well, but OPM should have adopted a version of the Hippocratic Oath, “First Do No Harm,” and on that criterion alone, these proposed regulations fail.	
(1) <i>Changing the Campaign Solicitation Period.</i> Under current regulations, the CFC campaign solicitation period runs from September 1 to December 15. OPM proposes to change its regulation at § 950.102 to shift the campaign solicitation period by one month, so that it would begin on October 1 and end on January 15. This will allow the many employees who take leave during the month of December to contribute through the campaign when they return in the month of January. It also enables employees to consider the impact of future pay and other benefits (which often take effect the first full pay period in January) before making donations.		<p>“Shifting the Campaign” is NOT the same as “Extending”</p> <p>In the CFC-50 Commission meetings there were many people and organizations that spoke to the benefit of extending the campaign to January 15th from the current December 15th end. There are many reasons for this, including both year-end charitable giving and federal personnel schedules.</p> <p>In watching all eight hours of video testimony, reading all the recommendations and appendices in the CFC-50 report, not a single person said “Shift the Campaign” from September to December to October to January. “Shifting” is not the same as “extending”</p>	<p><i>Back to The Drawing Board!</i></p> <p><i>Harms CFC Charities</i></p> <p><i>Reject/ Bad Idea</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		and there are many negative consequences to shifting, but since there was no mention of this at all in 4 public meetings over many months, the idea was not addressed. Additional analysis is contained in the section by section analysis.	
(2) <i>Immediate eligibility</i> . Under current regulations, new employees may not begin participating in the CFC until the next scheduled campaign solicitation period begins. OPM proposes to amend its regulation at § 950.102 to allow new employees to make CFC pledges immediately upon entering Federal service. Under OPM's proposal, new employees would be provided information on the CFC at orientation and be able to make pledges within 30 days of being hired if hired outside of the solicitation period. This will enable those employees who wish to make an immediate contribution to do so.		This was recommended by many in the CFC 50 Commission open meetings.	<i>Concur/keep</i>
(3) <i>Disaster Relief Program</i> . Under current regulations, the OPM Director is authorized to allow special solicitations to respond to disasters. There is no standing mechanism in place, but rather each disaster requires a new authorization from the Director for a special solicitation period. OPM proposes to create a permanent structure to streamline and facilitate solicitations tied to disaster relief. Accordingly, OPM proposes to amend its regulations at § 950.102 to provide for the creation of a Disaster Relief Program that would be available to		Disasters do not follow a set timetable, they can occur anywhere and at any time. Current regulations require special permission from OPM to any government agency that wants to conduct a special solicitation for a disaster, which is granted routinely. This change allows for Federal donors to give to CFC charities	<i>Concur/keep</i> <i>Good idea</i>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
donors within hours after a disaster.		that are involved in disaster relief whenever the disaster occurs.	
<p>(4) <i>Local Governance Structure.</i> Currently, the CFC is managed locally through Local Federal Coordinating Committees (LFCC). The number of LFCC representatives, the level of engagement, and knowledge of CFC rules and regulations varies greatly among the 184 campaign regions in the U.S. and overseas. In some areas, campaigns have difficulty identifying Federal employees who can dedicate the time to fulfill the LFCC's oversight responsibilities, including the selection of a Principal Combined fund Organization (PCFO), review and approval of reimbursable campaign expenses, review of local charity applications, and oversight of the PCFO's CFC functions. OPM is proposing to modify its regulations at § 950.103 to change the LFCC to a Regional Coordinating Committee (RCC) structure. Under this proposed change, the Director would maintain sole authority with regard to any revisions to the established geographical regions, establish limits for the RCC Chair, set requirement for a Vice Chair and establish new requirements for Agency head to appoint employees to assist with the campaign. At a minimum, the RCCs will be comprised of representatives of Federal inter-agency organizations, such as Federal Executive Boards and Federal Executive Associations, or personnel assigned to the military installation and/or Federal agency identified as the lead agency in that region. The responsibilities of the RCC will be similar to those of</p>		<p>Currently there are 184 LFCCs in the CFC and 28 Federal Executive Boards in areas outside the Washington DC National Capital area. In the public meetings there was no discussion of how this transition would actually occur. Whether or not OPM “believes the reduction in responsibilities, in addition to larger campaign regions from which members will be selected, will attract more individuals to serve in this important leadership role” there has been no information presented about what will be the boundaries of the new regions, or how this would actually work.</p> <p>As CFC regions have been consolidated over the past decade, participation has shrunk, and one could make the case that one of the factors in increasing participation is having a structure that encourages more face to face</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<p>the LFCC with the exception of the selection and oversight of a PCFO. OPM believes the reduction in responsibilities, in addition to larger campaign regions from which members will be selected, will attract more individuals to serve in this important leadership role.</p>		<p>contact, instead of less.</p> <p>There needs to be much more discussion of this will actually work in the Federal workforce, as opposed to restricting it to “OPM’s beliefs.” There was no discussion of this in the public CFC 50 Commission meetings.</p> <p>Also, while OPM has authority over FEBs, FEAs are voluntary, and OPM has no specific authority over them, so assigning them duties could be problematic.</p>	
<p>(5) <i>Electronic Donations.</i> OPM proposes to modify § 950.103 to eliminate the use of cash, check and money order contributions. Instead, all donations will be required to be made through electronic means. Electronic transfers are now widely available and by moving to an exclusively electronic donation system, we will increase the efficiency of administration of the CFC program, eliminate burdensome paperwork, and save resources.</p>		<p>This ignores the fact that significant amounts of CFC contributions are made by cash and check.</p> <p>In particular, this has major negative impacts for Federal personnel who wear uniforms, including members of the Army, Air Force, Navy, Marines and the Postal Service, many of whom do not have computer access during their duty period.</p> <p>When other workplace giving campaigns have tried to go “all</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		electronic” there has been a precipitous drop in donations.	
(6) <i>Training and Oversight.</i> OPM proposes to modify § 950.104 to provide for additional training and oversight of the RCC. The training will be conducted by OPM staff and will focus on oversight responsibilities, charity eligibility requirements, and how to select a marketing organization and review/approve its reimbursable marketing expenses.		There are currently 184 PCFOs (Principal Combined Fund Organizations) that conduct this training in the 184 regions, performed by at least 450 non-profit private sector staff. The OPM CFC Office has a staff of less than 20, and while many training functions can now be done via web based training there was no discussion of how this would actually be implemented.	<i>Reject/ Bad Idea</i> <i>Back to the Drawing Board!</i> <i>Needs more public discussion</i>
(7) <i>Elimination of Paper Processes.</i> OPM is also proposing to modify § 950.104 to eliminate paper processes within the CFC as much as possible. Specifically, OPM proposes changes in this section to eliminate printing and distributing the Charity List. Rather, this list will be made available exclusively through electronic means. This change will reduce overhead costs and increase efficiency in the administration of the CFC program.		This is a bad idea, and ignores the reality that thousands of Federal employees do not have access to a computer during their work day. It also ignores testimony made during the public meetings of the CFC -50 Commission that the charity list and pledge cards are also marketing tools, not just an “obsolete” method of fundraising. Other workplace giving campaigns at the municipal and state level have attempted to go	<i>Reject/ Bad Idea</i> <i>Back to the Drawing Board!</i> <i>Needs more public discussion</i>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		“all electronic” and when it has been tried, donations were cut in half until some mix of face to face and electronic solicitation was restored.	
<p>(8) <i>Streamlining Campaign Administration.</i> Under current regulations, many campaign administration functions are performed by a number of Principal Combined Fund Organizations (PCFOs) supporting local campaigns throughout the country. We believe that a centralized approach will benefit from economies of scale and ultimately reduce overhead costs. Accordingly, OPM proposes to modify its regulations at § 950.105 to eliminate the PCFOs. In their place, we propose to consolidate responsibilities for back office functions and establish one or more Central Campaign Administrators (CCA). The CCA would either perform these functions itself or would set up regional receipt and disbursement centers. We further propose that the RCC may engage a marketing firm to continue outreach to Federal, Postal and military personnel, functions currently coordinated by the PCFOs.</p>		<p>This proposed regulation eliminates more than 450 private sector jobs in the non-profit arena, transfers their functions to the Federal workforce, with no estimate on the reality of either creating new Federal positions or having current Federal personnel assume new duties.</p> <p>Currently PCFOs are required to be 501(c)(3) non-profits – why? The requirement that a PCFO be a 501(c)(3) non-profit is a relic from the early CFC regulations.</p> <p>Since for-profit contractors perform all types of varied services in the modern government, including air traffic controllers, military supply lines and thousands of other functions, why are PCFOs required to be non-profit?</p> <p>This idea was not discussed in</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p> <p>This is a massive shift from private sector non-profit jobs to Federal personnel.</p> <p>Open up PCFO opportunities to both private and non-profit contractors.</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		the CFC- 50 public meetings.	
<p>(9) <i>Administrative Costs.</i> Currently, the overhead administrative costs of much of the CFC program are paid for out of donor contributions to the campaign. We believe that more transparency with respect to administrative overhead would be beneficial to the program, to the donors, and to the charitable organization that receive donations through the program. Accordingly, OPM proposes that the cost of the campaign previously outlined in § 950.106 instead be recovered through application fees paid by the charitable organizations that apply for participation in the CFC. This section also establishes how the fees will be collected and the permissible uses of the fees.</p>		<p>The effect of this will be to destroy the CFC for small non-profits, whether they are local, national or international charities that will simply not enroll in the CFC program. The proposed regulations contain no timetable, no explanation of how this would actually work, and no amounts attached to proposed fees.</p> <p>One of the oldest marketing principles in the world is that “a confused customer does not buy” and in this case “a small confused CFC charity will not enroll.”</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Harms CFC Charities</i></p> <p><i>Keep the current Campaign Cost mechanism in place, it works, and it works well.</i></p>
<p>(10) <i>Streamlined Application Process.</i> OPM believes there are efficiencies to be gained in its charity application process. We are proposing to modify the regulations at § 950.201 to reduce the burden on charities that have previously been admitted to participate in the program. Thus, these charities would be required to produce a more limited specified set of documents, via a reduced application form, to be admitted for the subsequent two years. We think this approach will afford us with sufficient information to evaluate the charity's continuing eligibility while reducing unnecessary administrative burdens on the</p>		<p>The idea of making renewal applications simpler for CFC charities is a good one, but how exactly this would work and be implemented needs further discussion. There is no mention of timetables or costs in the proposed regulations, or who exactly would be responsible for creating the system for renewals.</p>	<p><i>Concur/keep</i></p> <p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
charity.			
(11) <i>Audit of Small Charities.</i> OPM is proposing to modify its regulations at § 950.203 to waive the audit requirement for organizations reporting less than \$100,000 in annual revenue to the IRS. In addition, we propose that an organization with annual revenue of at least \$100,000 but less than \$250,000 not be required to undergo an audit, but have their statements reviewed by an independent certified public accounting firm. This would remove a disproportionate burden on small charities.		<p>There was not significant discussion in the CFC 50 public meetings about the problems caused to non-profits by having the three financial levels, and the \$100,000 figure that has been in place for years has not been indexed to inflation.</p> <p>This proposed regulation is an improvement, but what should also be considered is elimination of the middle level (\$100,000 to \$250,000), and creating two levels for CFC non-profits: (1) Less than \$250,000 and (2) Greater than \$250,000 which would save millions in non-profit expenses.</p>	<p>If correctly addressed, this regulation could save millions in expenses for the CFC charities, and still ensure a high level of accountability.</p> <p><i>Needs more public discussion</i></p> <p><i>Back to the Drawing Board!</i></p>
(12) <i>Oversight of Federations.</i> OPM proposes to strengthen its regulations regarding federations to increase accountability and transparency. OPM proposes changes to § 950.301 to specify that federations provide a copy of each member organization's application, require dates upon which disbursements must be made to members, adds additional reporting requirements, and prohibit deductions of dues/fees from the disbursement of CFC contributions.		<p>This is a complete cancelation by government fiat of the federation business model that has been in existence for decades, and has worked very well. More than 70% of the funds raised through the CFC are from charities in federations, and the federations provide valuable services to their member non-profits.</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing Board!</i></p> <p>This is a massive overstepping of OPM's authority on dictating how federations should conduct their own</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
			private sector business operations.
<p>(13) <i>Payroll Deduction Disbursements</i>. OPM has decided to standardize and improve how payroll offices provide donor pledge reports to campaigns. OPM proposes changes to former § 950.901 (§ 950.801 in these proposed regulations) to require payroll offices to either distribute funds to the charities directly or, if funds are transmitted to the CCA, provide more detailed reports. Currently, Federal payroll office disbursement reports vary in format and level of detail, which adds to the administrative costs of the campaign administrators responsible for ensuring the accuracy of disbursements to designated charities.</p> <p>These proposed changes will introduce efficiencies and cost savings into the CFC by leveraging technology that was not widely available just a few years ago. They will make the CFC more efficient, more transparent, more accountable and more relevant to Federal, Postal and military service personnel who want to make the biggest impact with their donations.</p> <p>... continues... See note below:</p>		<p>This function is currently performed by the 184 PCFOS, which are non-profit contractors to the government, and their primary fiduciary responsibility is to see that the CFC donor's gifts are sent to the correct CFC charity. There has been no discussion about how the additional workload of tracking gifts to 25,000 CFC charities will be handled by the four Federal payroll offices.</p> <p>One important way that the payroll offices could be used, and this was not discussed in the CFC-50 public meetings, is to use the payroll messaging capability to say "Thank you" to the CFC donors. This was not discussed at all in the CFC -50 public meetings.</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>
<p>Note from Huddleston: The paragraph below is contained at the end of the: (13) <i>Payroll Deduction Disbursements</i> section, but it is really a concluding paragraph referring to the entire set of proposed changes to the CFC regulations. It is in a separate row for purposes of analysis and comment.</p>			
<p>While these proposals would make significant changes in the operation of the CFC, OPM remains committed to</p>		<p>The CFC 50 Commission did a good job, but too many of their</p>	<p>Don't Kill the Golden Goose of American</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<p>ensuring the broad participation of a multitude of charities in the CFC, and to preserving the local character, sense of community, and employee involvement that has been a hallmark of the CFC. We welcome comments on how to best maintain these important attributes as we take steps to improve the CFC for the future.</p>		<p>24 recommendations are ignored, or the changes proposed by OPM go far beyond what was discussed in the CFC-50 Open Meetings. There are some good ideas in the proposed regulations, such as immediate employee eligibility and the disaster relief program.</p> <p>In terms of actual giving, if the CFC was a foundation, it would be the 14th largest foundation in the USA, and the regulations as proposed will harm it. Some of the regulations are poorly organized, with no logic behind them. For example, the section dealing with Federal retirees instead of being in a “Donors” section is hidden in the “establishing Regional Committees” section, ignores the CFC-50 Commission recommendations, and makes a multi-million dollar error in judgment, all in less than a paragraph.</p> <p>OPM needs to not kill the “Golden Goose of American Philanthropy” and instead go back to the drawing board, and</p>	<p>Philanthropy, the Combined Federal Campaign (CFC), go back to the drawing board and have a much wider base involved in the discussion of ways to improve the CFC.</p> <p>Many obvious ones were not even mentioned in the CFC 50 Public Meetings.</p> <p>The CFC-50 Commission meetings were attended by a relatively small number of observers, and it’s an extremely small number that have watched the video recordings.</p> <p>Here are the view counts as of May 20,2013 from the YouTube- CFC- 50 Open Meeting Videos: Inaugural Session: Sept 13, 2011 - 1233 views Dec. 6, 2011-1474 views March 2,2012 704 views May 29, 2012 245 views</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		actually listen to the wide variety of people that care about the CFC and want it to succeed.	Please continue below for my section by section analysis of the impact of the proposed changes to the CFC regulations.
<ul style="list-style-type: none"> <u>950.101 Definitions.</u> 	<p><i>Section 950.101 Definitions.</i></p> <p>Definitions were reviewed and updated to conform to the proposed regulatory changes. Accordingly, we propose to eliminate terms no longer applicable (Campaign Period, Designated Funds, Domestic Area, Local Federal Coordinating Committee (LFCC), Overseas Area, Principal Combined Fund Organization (PCFO), Undesignated Funds), add new terms (Campaign Expenses, Central Campaign Administrator (CCA), Charity Application Fees, Regional Coordinating Committee (RCC)), and revise definitions of some of the terms that remain in place (Administrative Expenses, Charity List,</p>	<p>Many of the changes proposed are not advisable, and in fact are extremely harmful to the continued success of the CFC; please see the analysis below for details.</p> <p>Since this is the definition section, no further comment is needed.</p>	

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
	Organization or Charitable Organization, Solicitation).		
<ul style="list-style-type: none"> 950.102 Scope of the Combined Federal Campaign. <p>Note: There are so many regulatory changes contained in this one section that I have divided the analysis by topic. Bill Huddleston</p> <p>Topic areas are:</p> <ol style="list-style-type: none"> (1) Adjustment of solicitation dates (2) Elimination of LFCC campaign dates (3) New Employee pledges (4) Disaster Relief 	<p><i>Section 950.102 Scope of the Combined Federal Campaign.</i></p> <p>Adjusts solicitation dates to October 1-January 15 from September 1-December 15. This shift addresses concerns about having the campaign end in December, while maintaining the current length of the solicitation period, as well as eliminating the requirement for the LFCC to establish campaign dates. It also provides the opportunity for new employees to pledge within 30 days if hired outside the solicitation period, and establishes standard guidance for Disaster Relief support.</p>		
<ul style="list-style-type: none"> 950.102 Scope of the Combined Federal Campaign. 	<p><i>Section 950.102 Scope of the Combined Federal Campaign.</i></p> <p>Adjusts solicitation dates to October 1-January 15 from September 1-December 15. This</p>	<p>“Shifting the Campaign” is NOT the same as “Extending”</p> <p>In the CFC-50 Commission meetings there were many people and organizations that</p>	<i>Reject/ Bad Idea</i>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
(1)Adjustment of solicitation dates	shift addresses concerns about having the campaign end in December, while maintaining the current length of the solicitation period, as well as eliminating the requirement for the LFCC to establish campaign dates. It also provides the opportunity for new employees to pledge within 30 days if hired outside the solicitation period, and establishes standard guidance for Disaster Relief support.	<p>spoke to the benefit of extending the campaign to January 15th from the current December 15th end. There are many reasons for this, including both year-end charitable giving and federal personnel schedules.</p> <p>In watching all eight hours of video testimony, reading all the recommendations and appendices in the CFC-50 report, not a single person said “Shift the Campaign” from September to December to October to January. “Shifting” is not the same as “extending” and there are many negative consequences to shifting, but since there was no mention of this at all in 4 public meetings over many months, the idea was not addressed.</p> <p>The negative consequences include, but are not limited to, that by shifting the start date it makes it much more difficult for agencies to schedule outdoor charity fairs, which by their very nature are mid-campaign events. There are five distinct</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		<p>phases for a non-profit in the CFC, and in Phase IV, the Campaign Activities Period, this is when CFC Kick-offs and Charity Fairs are held.</p> <p>Particularly for large installations that have a number of employees and/or members of the uniformed services, these events are held outdoors, including on military bases, postal service centers, and the FBI HQ to name just a few.</p> <p>If the start date is shifted, it moves the mid-campaign period from October to early November to mid- November to December, and in many places in the USA, it's too cold for outdoor events!</p>	
<ul style="list-style-type: none"> 950.102 Scope of the Combined Federal Campaign. <p>(2) Elimination of LFCC campaign dates</p>	<p><i>Section 950.102 Scope of the Combined Federal Campaign.,</i></p> <p>as well as eliminating the requirement for the LFCC to establish campaign dates.</p>	<p>Currently 184 LFCCs set the dates for local CFC applications in their region. If LFCCs are eliminated there has not been any discussion on how OPM will handle the approval of the approximately 25,000 applications for local CFC charities.</p>	<p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<ul style="list-style-type: none"> 950.102 Scope of the Combined Federal Campaign. <p>(3) New Employee pledges</p>	<p><i>Section 950.102 Scope of the Combined Federal Campaign.</i></p> <p>It also provides the opportunity for new employees to pledge within 30 days if hired outside the solicitation period....</p>		<p>Concur/keep</p> <p>Good idea</p>
<ul style="list-style-type: none"> 950.102 Scope of the Combined Federal Campaign. <p>(4) Disaster Relief</p>	<p><i>Section 950.102 Scope of the Combined Federal Campaign.</i></p> <p>...and establishes standard guidance for Disaster Relief support</p>	<p>Disasters do not follow a set timetable, they can occur anywhere and at any time. Current regulations require special permission from OPM to any government agency that wants to conduct a special solicitation for a disaster, which is granted routinely. This change allows for Federal donors to give to CFC charities that are involved in disaster relief whenever the disaster occurs.</p>	<p>Concur/keep</p> <p>Good idea</p>
<ul style="list-style-type: none"> 950.103 Establishing Regional Coordinating Committees. <p>Note: There are so many regulatory changes contained in this one section that I have divided the analysis by topic. Bill Huddleston</p>	<p><i>Section 950.103 Establishing Regional Coordinating Committees.</i></p> <p>Changes Local Federal Coordinating Committee (LFCC) to Regional Coordinating Committee (RCC)</p>	<p><i>The section of the proposed regulations dealing with Federal retirees is hidden in this section. This is a stunning example of extremely poorly written proposed change to the CFC regulations, and it is staggering in its scope. Please see the</i></p>	<p>Reject/ Bad Idea</p> <p>Back to the Drawing Board!</p> <p>Needs more public</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<p>Topic areas are:</p> <p>(1) Elimination of 184 LFCCs</p> <p>(2) Elimination of all check, cash and money order gifts, and requires only electronic giving.</p> <p>Elimination of restriction on soliciting non-Federal personnel, including Federal retirees, which I have split into two categories:</p> <p>(3) Federal Retirees</p> <p>(4) Contractors</p> <p>(5) Elimination of campaign boundaries with regards to giving, e.g. often called universal giving.</p>	<p>to better reflect the proposed responsibilities of this committee of Federal personnel. Requires appointment of RCC Chair and Vice Chair, limits Chair term to no more than 3 consecutive years. Establishes new requirement for Agency heads to appoint employees in support of the campaign. Eliminates use of cash, check and money order, limits pledging to electronic means using only payroll deduction or credit cards, and also eliminates restriction on soliciting non-Federal personnel. Removes campaign boundaries with regard to donors, as universal giving is supported in a completely electronic process.</p>	<p><i>analysis below for the specifics.</i></p>	<p>discussion</p>
<ul style="list-style-type: none"> 950.103 Establishing Regional Coordinating Committees. <p>(1) Elimination of 184 LFCCs</p>	<p><i>Section 950.103 Establishing Regional Coordinating Committees.</i></p> <p>Changes Local Federal Coordinating Committee (LFCC) to Regional Coordinating Committee (RCC) to better reflect the proposed</p>	<p>Eliminates 184 Local Federal Coordinating Committees and replaces them with an unknown number of Regional Coordinating Committees with unknown boundaries.</p> <p>There needs to specific plans with maps and timetables for</p>	<p>Back to the Drawing Board!</p> <p>Needs more public discussion</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
	responsibilities of this committee of Federal personnel. Requires appointment of RCC Chair and Vice Chair, limits Chair term to no more than 3 consecutive years. Establishes new requirement for Agency heads to appoint employees in support of the campaign.	this to work. As the number of LFCCs has been reduced, participation has also declined, and a case can be made that as the CFC campaigns become more removed, participation suffers.	
<ul style="list-style-type: none"> 950.103 Establishing Regional Coordinating Committees. <p>(2) Elimination of all check, cash and money order gifts, and requires only electronic giving.</p> <p>.</p>	<p><i>Section 950.103 Establishing Regional Coordinating Committees.</i></p> <p>Eliminates use of cash, check and money order, limits pledging to electronic means using only payroll deduction or credit cards, and also eliminates restriction on soliciting non-Federal personnel. Removes campaign boundaries with regard to donors, as universal giving is supported in a completely electronic process.</p>	<p>This is a bad idea, and ignores the reality that thousands of Federal employees do not have access to a computer during their work day. It also ignores testimony made during the public meetings of the CFC -50 Commission that the charity list and pledge cards are also marketing tools, not just an “obsolete” method of fundraising.</p> <p>Other workplace giving campaigns at the municipal and state level have attempted to go “all electronic” and when it has been tried, donations were cut in half until some mix of face to face and electronic solicitation was restored.</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<p>950.103 Establishing Regional Coordinating Committees.</p> <p>(3) Federal Retirees</p> <p>FEDERAL RETIREES</p> <p>Elimination of restriction on soliciting non-Federal personnel, - Federal retirees.</p> <p>This is the language of the proposed regulation:</p> <p>(d) Current Federal civilian and active duty military employees may be solicited for contributions using payroll deduction or by electronic means, including credit cards, as approved by the Director. Contractor personnel, credit union employees and other persons present on Federal premises, as well as retired Federal employees, may make single contributions to the CFC by electronic means, including credit cards, as approved by the Director.</p>	<p><i>Section 950.103 Establishing Regional Coordinating Committees.</i></p> <p>Eliminates use of cash, check and money order, limits pledging to electronic means using only payroll deduction or credit cards, and also eliminates restriction on soliciting non-Federal personnel.</p>	<p>This is a multi-million dollar error in judgment that is buried in a section named “Establishing Regional Coordinating Committees,” as opposed to something obvious like “CFC Donors – Federal Retirees.”</p> <p>Federal retirees cannot currently donate through the CFC. Federal retirees should be able to designate a portion of their retirement pay to their favorite CFC charities, if they wish to do so. One of huge benefits of the CFC to current employees is the payroll deduction feature, and this option should be made available to Federal retirees, and they should not be limited to a one-time credit card donation</p> <p>In the CFC 50 Final Report, the National Association of Retired Federal Employees (NARFE) estimates that including Federal retirees could generate \$132,000,000 to \$165,000,000 annually to the CFC. The proposed regulation is in direct opposition to the CFC-50 Final Report, which presumed a</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing Board</i></p> <p><i>Allow Federal Retirees to contribute to the CFC through retirement pay deductions.</i></p> <p><i>Additionally, recipients of Federal Survivor benefits should be able to contribute to their favorite charities through the CFC if they wish to do so.</i></p> <p>Allow Federal Retirees to contribute to the CFC with a portion of their retirement pay, so that they can continue with the most significant benefit of the CFC to CFC donors, that of payroll (now retirement pay) deduction.</p> <p>Millions of dollars are at stake in this single</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		<p>retirement pay deduction method to achieve this.</p> <p>Retirees can direct \$50 payments to go to their savings account, why can't they do the same with their CFC designations?</p> <p>This is not that hard to do.</p> <p>Recipients of Federal Survivor benefits should also be able to continue to contribute to their favorite charities through the CFC if they wish to do so.</p>	proposed regulation.
<ul style="list-style-type: none"> 950.103 Establishing Regional Coordinating Committees. <p>(4) Contractors</p>	<p><i>Section 950.103 Establishing Regional Coordinating Committees.</i></p> <p>...also eliminates restriction on soliciting non-Federal personnel.</p>	<p>Contractors, whether they are onsite or not, are paid through their organization's payroll system, and many have their own workplace giving programs, and having contractors participate in the CFC is simply not a good idea and contradicts good contract management principles.</p> <p>A case can be made that the Credit Union employees on-site at Federal installations are in a different category, and if they wish to make a credit card donation it's not going to affect</p>	<p>Reject/ Bad Idea</p> <p>Back to the Drawing Board!</p> <p>Needs more public discussion</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		the relationship between the government and contractors in meeting its mission.	
<ul style="list-style-type: none"> 950.103 Establishing Regional Coordinating Committees. <p>(5) Elimination of campaign boundaries with regards to giving, e.g. often called universal giving.</p>	<p><i>Section 950.103 Establishing Regional Coordinating Committees.</i></p> <p>Removes campaign boundaries with regard to donors, as universal giving is supported in a completely electronic process.</p>	<p>Universal Giving: Promised to Non-profits when 5 digit codes were implemented in 2006.</p> <p>How exactly this “completely electronic process” is going to work has not been thoroughly discussed, and while universal giving is a good idea, it will probably never be more than 5% of the gifts, with the exception of deployed troops.</p>	<p>Concur/keep</p> <p>Needs more public discussion</p>
<ul style="list-style-type: none"> 950.104 Regional Coordinating Committee responsibilities. <p>Note: There are so many regulatory changes contained in this one section that I have divided the analysis by topic. Bill Huddleston</p> <p>Topic areas are:</p> <ol style="list-style-type: none"> (1) Change from Local LFCC to Regional Structure (2) Federal Regional Training Requirements (3) Elimination of Local Application Review Process (4) Elimination of PCFO (private sector) Training 	<p><i>Section 950.104 Regional Coordinating Committee responsibilities.</i></p> <p>Provides for a transition from a large number of “local” campaigns to a smaller number of “regions,” requiring a reduced number of Federal personnel for oversight purposes. Requires committee members to gain a complete understanding of regulations and procedures by attending specific training and achieving certification in RCC operations.</p>		

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<p>Responsibilities, transfer to Federal workforce</p> <p>(5) Campaign Marketing Support</p> <p>(6) Elimination of Loaned Executives</p>	<p>Eliminates the local application review responsibility, and tasks the RCC to assist OPM with application review as assigned. Reassigns the responsibility for training the campaign personnel from the PCFO to the RCC. Establishes the ability for RCC to hire campaign marketing support. Eliminates the need for Loaned Executives in a fully electronic pledging environment.</p>		
<ul style="list-style-type: none"> 950.104 Regional Coordinating Committee responsibilities. <p>(1) Change from Local to Regional Structure</p>	<p><i>Section 950.104 Regional Coordinating Committee responsibilities.</i></p> <p>Provides for a transition from a large number of “local” campaigns to a smaller number of “regions,” requiring a reduced number of Federal personnel for oversight purposes.</p>	<p>Eliminates 184 regional CFC campaigns and replaces them with an unknown number of Regional Coordinating Committees with unknown boundaries and boundaries that have had no discussion.</p> <p>There need to be specific plans with maps and timetables for this to work.</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>
<ul style="list-style-type: none"> 950.104 Regional Coordinating Committee responsibilities. 	<p><i>Section 950.104 Regional Coordinating Committee responsibilities.</i></p>	<p>What is the timetable for this, and what exactly is meant by “achieving certification in RCC operations.” What’s the timetable for OPM to develop</p>	

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
(2) Federal Regional Training Requirements	Requires committee members to gain a complete understanding of regulations and procedures by attending specific training and achieving certification in RCC operations.	this training?	
<ul style="list-style-type: none"> 950.104 Regional Coordinating Committee responsibilities. (3) Elimination of Local Application Review Process	<p><i>Section 950.104 Regional Coordinating Committee responsibilities.</i></p> <p>Eliminates the local application review responsibility, and tasks the RCC to assist OPM with application review as assigned.</p>	184 LFCCs currently review local charity applications, and the number submitted varies greatly by region (in general, a bigger region will have more applications). Currently there are a total of about 25,000 applications processed by the 184 LFCCs, and there has been no discussion on how OPM will handle this proposed increase to its workload.	<p>Back to the Drawing Board!</p> <p>Needs more public discussion</p>
<ul style="list-style-type: none"> 950.104 Regional Coordinating Committee responsibilities. (4) Elimination of PCFO (private sector) Training Responsibilities, transfer to Federal workforce.	<p><i>Section 950.104 Regional Coordinating Committee responsibilities.</i></p> <p>Reassigns the responsibility for training the campaign personnel from the PCFO to the RCC.</p>	The effect of this is to eliminate at least 450 private sector non-profit jobs. Many training functions are certainly migrating to web-based instruction but the loss of non-profit jobs was not discussed in the CFC 50 Public Meetings. There are currently 184 PCFOs, there are an undetermined number of RCCs to be established, with boundaries not yet discussed.	<p>Back to the Drawing Board!</p> <p>Needs more public discussion</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<ul style="list-style-type: none"> 950.104 Regional Coordinating Committee responsibilities. <p>(5) Campaign Marketing Support</p>	<p><i>Section 950.104 Regional Coordinating Committee responsibilities.</i></p> <p>Establishes the ability for RCC to hire campaign marketing support.</p>	<p>Currently 184 LFCCs perform this function by selecting the PCFO for their region. There has been no discussion of what the boundaries are for the RCCs and how are they going to hire campaign marketing support when there has been no decisions or discussions about any of the planned “super CFC regions” to coin a term.</p> <p>There need to be specific plans with maps and timetables for this to work.</p> <p>How are RCCs to pay for campaign marketing support, since in other parts of the proposed regulations, the method of payment that has been in place for decades has been eliminated elsewhere in the proposed regulations.</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>
<ul style="list-style-type: none"> 950.104 Regional Coordinating Committee responsibilities. <p>(6) Elimination of Loaned Executives</p>	<p><i>Section 950.104 Regional Coordinating Committee responsibilities.</i></p> <p>Eliminates the need for Loaned Executives in a fully electronic pledging environment.</p>	<p>This is a fiction, with no evidence from OPM to back it up. Indeed, when certain city and state workplace campaigns have tried a fully electronic giving environment, the amount given to charities has dropped</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		<p>by 50 percent.</p> <p>Loaned Executives act as consultants to Federal agencies on how to conduct the most effective CFC campaigns possible.</p> <p>Federal Agency CFC Volunteers play many roles, and they offer a "practice field" for the leadership and communication qualities from the Executive Core Qualifications (or ECQs) of the Senior Executive Service. For my non-profit colleagues, pardon the government jargon, but take a look at the leadership qualities identified, many of them also apply to the leadership development of non-profit professionals and volunteers as well.</p> <p>The CFC ECQ worksheet can be found on the Facebook SAVETHE CFC open Group.</p>	<p>There was no discussion in the CFC 50 public meetings about this.</p>
<u>950.105 Federal Agency Head responsibilities.</u>	<p><i>Section 950.105 Federal Agency Head responsibilities.</i> Outlines specific responsibilities of Agency Heads to include identification of employees in support of the</p>	<p>By regulation, agency heads are in charge of their agency's annual CFC campaign. As a practical manner, they often delegate a senior SES person to be the Vice-Chair for their</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
	campaign. Previously defined duties are also indicated to include providing support to the campaign, becoming familiar with the regulations, and assuring the campaign is conducted in accordance with those regulations.	agency's campaign. This particular regulation however strikes me as too much micromanagement by OPM regarding the details of how an agency head, including Cabinet secretaries should set his or her priorities in their agency, and could easily be counter-productive.	Board!
<u>950.106 Central Campaign Administrator (CCA).</u>	<i>Section 950.106 Central Campaign Administrator (CCA)</i> Establishes CCA requirements, roles and functions and eliminates requirement for PCFO and all references thereto. Provides guidance for circumstances where no qualified CCA can be retained.	This eliminates 184 private sector contractors to the government that employ an unknown number of people, but it has to more than 450 private sector positions. (larger regions, e.g. Chicago, San Diego, etc .) have more PCFO personnel than smaller ones.	<i>This is a massive transfer of functions from private sector non-profits to the Federal workforce.</i> <i>Back to the Drawing Board!</i> <i>Needs more public discussion</i>
<u>950.107 Campaign expense recovery.</u>	<i>Section 950.107 Campaign Expense recovery.</i> Shifts the expense of the campaign from the donor to the charities via a charity application fee and changes PCFO expenses to campaign expenses (CCA and marketing costs).	The effect of this will be to force many small charities out of the CFC. If that is the intention, it needs to be stated and discussed, but that will be the effect of this regulation. The proposed regulation also belies a fundamental	<i>Reject/ Bad Idea</i> <i>Keep the current system.</i>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		<p>misunderstanding how the non-profit world works, and one of the huge benefits that the current CFC regulations do provide to CFC charities, the fact the CFC is “no money down fundraising.”</p> <p>Leaving aside medical charities that may get government reimbursements, the fundamental truth is that donors always pay the cost of fundraising. For example, it may not be the current donor paying for the cost of direct mail campaign with a 4% acceptance rate (which is good), but donors pay for the cost of fundraising. The only question is whose checkbook does it come out of for a particular transaction or campaign, but the sources of non-profit funds are donors.</p> <p>In the CFC, the fact that CFC donors pay for the cost of fundraising from their contribution, before it gets to the CFC non-profit’s checkbook is one of the benefits to CFC charities.</p>	Back to the Drawing Board!

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<u>950.108 Preventing coercive activity.</u>	<p><i>Section 950.108 Preventing Coercive activity.</i></p> <p>No changes.</p>	This is an area where the Federal government has been a leader in workplace giving, ensuring that the employees do not face coercive pressure to donate. Some of the regulations that help ensure this include: Participation goals cannot be set higher than 75%, managers can't solicit their employees, etc.	Concur/keep
<u>950.109 Avoidance of conflict of interest.</u>	<p><i>Section 950.109 Avoidance of Conflict of Interest.</i></p> <p>Removed references to LFCC and PCFO, added reference to RCC.</p>	The elimination of the PCFOs destroys at least 450 private sector jobs, which is a very conservative estimate.	Contingent upon LFCC and PCFO decisions.
(4) <u>950.110 Prohibited discrimination.</u>	<p><i>Section 950.110 Prohibited discrimination.</i></p> <p>Updated to meet current legal standards.</p>		Concur/keep
(5) <u>950.201 Charity eligibility.</u>	<p><i>Section 950.201 Charity eligibility.</i></p> <p>Combines all current charity eligibility guidance into one subpart, eliminating separate sections for national/</p>		Concur/keep

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
	international and local. Eliminates annual application requirement and instead establishes a streamlined verification process for two “renewal” years after the year in which the initial full application is approved		
<u>950.202 Charity eligibility requirements.</u>	<i>Section 950.202 Charity eligibility requirements.</i> Establishes in one section requirements for national/international and local charities. Codifies several OPM guidance memoranda into the regulation (2006-21 and 2008-08). Removes requirement to submit IRS verification letter if the organization can be verified in the IRS Business Master File (BMF). Outlines verification requirements for local affiliates, churches and Family Support and Youth Activities/Family Support and Youth Programs FSYA/FSYPs.		Concur/keep
<u>950.203 Public accountability standards.</u>	<i>Section 950.203 Public accountability standards.</i> Specifies ‘calendar year’ where previous reference was unclear	Does not clearly address the problems created by	Back to the Drawing Board! Needs more public

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
	and updated sample dates. Specifies requirement for US or International Accounting Standards, and modifies transition levels for audit requirements. Removes requirement for Attachment A of IRS Form 990, and removes definition of `pro forma 990' so requirements can be modified easily as the IRS updates the form.	organizations whose fiscal year is not the calendar year.	<i>discussion</i>
<u>950.204 Eligibility decisions and appeals.</u>	<i>Section 950.204 Eligibility decisions and appeals.</i> All local eligibility requirements merged from this section into section 950.203. New section 950.204 establishes process for decisions and appeals in lieu of certified or registered mail. Codifies appeal information in OPM guidance memorandum 2012-03.		Section now in 950.203. See note above.
<u>950.301 Federation eligibility.</u>	<i>Section 950.301 Federation eligibility.</i> Establishes specific requirements, combining national/international and local federation eligibility		<i>Needs more public discussion by federation experts as to the effect</i>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
	requirements into one section. Requires federations to submit a copy of each member organization's application as outlined in the Charity Eligibility section. Specifies 'calendar year' where previous reference was unclear.		<i>of this proposal.</i>
<u>950.302 Responsibilities of federations.</u>	<p><i>Section 950.302 Responsibilities of federations</i></p> <p>Combines national/international and local federation responsibilities into one section. Establishes requirement for federations to disburse funds to members on a quarterly basis, and prohibits federations from deducting fees or charges from disbursements made to member organizations. Requires that CFC funds are identified as such when payments that include non-CFC funds are made to member organizations.</p>	Federations provide valuable services to their members. The prohibition of deducting their fees is a complete change of how they've operated since their inclusion in the CFC. It does not appear that there was much, if any discussion about this in the CFC-50 Commission public meetings.	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>
<p>950.401</p> <p>CAMPAIGN and PUBLICITY INFORMATION</p>		This section (950.401) is full of ideas that were not discussed in the CFC -50 public meetings.	

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<u>950.401 Campaign and publicity information.</u>	<p><i>Section 950.401 Campaign and publicity information.</i></p> <p>Removes references to PCFO, changes references from LFCC to RCC. Eliminates use of paper Charity List and pledge form, as all donations must be entered electronically. Removes the undesignated gift option. Removes guidance for confidential gifts as gifts will be made electronically. Adds requirement and references for credit card usage. Adds the organization's Web site address as a standardized item in each charity list entry, and revises the 25 word statement to a 256 character statement.</p>	Eliminating the 25 word description that has been in place for decades and replacing it with a 256 character statement is harmful to both CFC donors and CFC charities, and tilts what has been a level playing field. Why should a CFC charity whose mission uses longer words, for example, a medical research charity be penalized?	<p><i>Back to the Drawing Board!</i></p> <p>Harms CFC Charities</p> <p>Harms CFC Donors</p> <p>Reject/ Bad Idea</p>
(a) The specific campaign marketing and publicity information will be developed locally, except as specified in the regulations in this subpart. All information must be reviewed and approved by the RCC for compliance with these regulations and will be developed and supplied by the RCC or contracted agent.		<p>There has been no discussion about how many RCCs there will be, what the boundaries will be, or how this would work. Therefore there is no definition of “local” since no one knows any boundaries for the RCCs. There are currently 184 CFC regions, with 184 PCFOs contractors with staff</p>	<p><i>Back to the Drawing Board!</i></p> <p>Harms CFC Charities</p> <p>Reject/ Bad Idea</p> <p><i>Needs more public</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		<p>performing these functions.</p> <p>This is a massive shift of function from private sector non-profit organizations to Federal organizations with no plans, boundaries, or budgets revealed on how this would actually work. Given the nature of current Federal budget situations, these proposals need much more detailed work.</p>	<i>discussion</i>
(b) During the CFC solicitation period, participating CFC organizations may distribute bona fide educational information describing its services or programs. The organization must be granted permission by the Federal agency installation head, or designee to distribute the material. CFC Other employees or members of the RCC, are not authorized to grant permission for the distribution of such information. If one organization is granted permission to distribute educational information, then the Federal agency installation head must allow any other requesting CFC organization to distribute educational information.			<p><i>Concur/keep</i></p> <p><i>Good idea</i></p>
(c) Organizations and federations are encouraged to publicize their activities outside Federal facilities and to broadcast messages aimed at Federal employees in an attempt to solicit their contributions through the media and other outlets.		<p>High performing CFC charities already publicize. There are several simple steps that any CFC charity should take, and the CFC marketing messages can also be used by the CFC charity as a means of developing teamwork and leadership. There are two simple actions</p>	<p><i>Concur/keep</i></p> <p><i>Good idea</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		that a CFC charity can take that will answer 90% of the questions a potential donor might have and that's to have the CFC logo and their 5 digit code on their homepage.	
(d) Agency Heads are further authorized to permit the distribution by organizations of promotional information to Federal personnel in public areas of Federal workplaces in connection with the CFC, provided that the manner of distribution accords equal treatment to all charitable organizations furnishing such information for local use, and further provided that no such distribution shall utilize Federal personnel on official duty or interfere with Federal government activities. RCC members and other campaign personnel are to be particularly aware of the prohibition of assisting any charitable organization or federated group.			Concur/keep Good idea
(e) The Campaign Charity List and pledge form are the official sources of CFC information and shall be made available in electronic format to all potential contributors. The Charity List and pledging system must inform employees of their right to make a choice to contribute or not to contribute.		It is fine to make the Charity Campaign List available in an electronic format, however that does not mean that all paper copies should be completely eliminated. The Charity List itself in its printed for marketing purposes, which are not served by a 100% electronic list.	Needs more public discussion
(f) Campaign marketing materials must be comprised of a simple and attractive design that is donor focused and has fundraising appeal and essential working information. The design must focus on the CFC without undue use of charitable organization symbols and logos or other distractions that compete for the donor's		Design choices should be left up to the CFC charities. If a charity wants to use their "charity good housekeeping seal	Reject/ Bad Idea Harms CFC Charities Harms CFC donors

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
attention.		of approval” type logo, let them.	
<p>(g) The following applies specifically to the campaign Charity List:</p> <p>(1) OPM will provide the approved Charity List as well as general campaign information. This will include:</p> <p>(i) An explanation of the payroll deduction privilege.</p> <p>(ii) A description and explanation of other electronic pledging, to include credit cards.</p> <p>(iii) A statement that the donor may only designate charitable organizations or federations that are listed in the Charity List and that write-ins are prohibited.</p> <p>(iv) Instructions as to how an employee may obtain more specific information about the programs and the finances of the organizations participating in the campaign.</p> <p>(v) A description of employees' rights to pursue complaints of undue pressure or coercion in Federal fundraising activities.</p>			Concur/keep
<p>(2) The Charity List will consist of National/International, International, and Local organizations. The order of these organizations will be rotated annually in accordance with OPM instructions. The order of listing of the federated and independent organizations will be determined by a random selection process. The order of organizations within each federation will be determined by the federation. The order within the National/International, International and Local independent groups will be alphabetical. Absent specific instructions from OPM to the contrary, each participating organization and federated group listing must include a description, not to exceed 256</p>		<p>This regulation replaces the 25 word description that has been in place for decades, which is the one piece of the CFC information that the CFC charity gets to write to tell its story with a 256 character limit.</p> <p>Why?</p> <p>Why should a charity that has a mission where longer words are</p>	<p>Reject/ Bad Idea</p> <p>Keep the 25 word description!</p> <p>Harms CFC Charities</p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<p>characters, of its services and programs, plus a Web site address and telephone number for the Federal donor to obtain further information about the group's services, benefits, and administrative expenses. Each listing will include the organization's administration and fundraising percentage as calculated pursuant to § 950.203(a)(4). Neither the percentage of administrative and fundraising expenses, nor the Web site address or telephone number count toward the 256 character description.</p>		<p>needed, e.g. some of the medical research charities, than one that can say use shorter words, like “rescues dogs” be penalized?</p> <p>This “solution” creates more problems than it solves, people think in words, not characters.</p> <p>This is extremely harmful to the CFC non-profits, and it impairs the ability of the CFC donor to learn about a given non-profit. This is a truly dumb bureaucratic response, someone has gone “twitter crazy.”</p> <p>If the paper catalog is to be eliminated, it also makes no sense because the web-based catalog could easily handle a 25, 50 or even a 100 word description.</p>	<p><i>Harms CFC Donors</i></p> <p><i>There was no discussion of this in the CFC - 50 public meetings.</i></p>
<p>(3) Each federation and charitable organization will be assigned a code in a manner determined by the Director. At the beginning of each federated group's listing will be the federation's name, code number, 256 character description, percentage of administrative and fundraising expenses, Web site address and telephone number. Each organization will be identified as National/International, International and Local, respectively.</p>		<p>It needs to be made clear that if a charity already has a 5 digit code, it does not change.</p> <p>The 256 character description is an extremely bad idea and should be rejected, and it harms the CFC charities, as well as it harms the ability of CFC donors</p>	

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		to get information about charities.	
<p>(h) <i>Listing of national and local affiliate.</i> Listing of a national organization, as well as its local affiliate organization, is permitted. Each national or local organization must individually meet all of the eligibility criteria and submit independent documentation as required in § 950.202 and § 950.203 to be included in the Charity List. However, a local affiliate of a national organization that is not separately incorporated, in lieu of its own 26 U.S.C. 501(c)(3) tax exemption letter and, to the extent required by § 950.203(a)(2), audited financial statements, may submit the national organization's 26 U.S.C. 501(c)(3) tax exemption letter and audited financial statements, but must provide its own pro forma IRS Form 990, as defined in § 950.203(a)(3), for CFC purposes. The local affiliate must submit a certification from the Chief Executive Officer (CEO) or CEO equivalent of the national organization stating that it operates as a bonafide chapter or affiliate in good standing of the national organization and is covered by the national organization's 26 U.S.C. 501(c)(3) tax exemption, IRS Form 990 and audited financial statements.</p>			No opinion
<p>(i) <i>Listing local offices.</i> Listing of a local organization, as well as its satellite offices, is permitted, as long as there is no more than one location within a county or parish. Each office must individually meet all of the eligibility criteria and submit independent documentation as required in § 950.202 and § 950.203 to be included in the Charity List. However, a satellite office that is not separately incorporated, in lieu of its own 26 U.S.C. 501(c)(3) tax exemption letter and, to the</p>			No opinion

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
extent required by § 950.203(a)(2), audited financial statements, may submit the local organization's 26 U.S.C. 501(c)(3) tax exemption letter and audited financial statements, but must provide its own pro forma IRS Form 990, as defined in § 950.203(a)(3), for CFC purposes. The satellite office must submit a certification from the Chief Executive Officer (CEO) or CEO equivalent of the local organization stating that it operates as a bonafide office in good standing and is covered by the local organization's 26 U.S.C. 501(c)(3) tax exemption, IRS Form 990 and audited financial statements.			
(j) <i>Multiple listing prohibited.</i> Except as provided in paragraphs (h) and (i) of this section, once an organization is deemed eligible, it is entitled to only one listing in the Charity List, regardless of the number of federations to which that organization belongs			<i>Concur/keep</i>
950.402 Pledge form.	<p><i>Section 950.402 Pledge form</i></p> <p>Removes use of paper pledge forms, and all references thereto. Also removes undesignated option, as well as all references with regard to undesignated pledging.</p>	<p>More than 80% of Federal employees use paper pledge forms, which is also an important marketing tool for the Federal CFC campaign team and keyworkers running their agency's campaign</p> <p>This change is particularly harmful for Federal personnel who wear uniforms, including members of the Army, Air Force, Navy, Marines and the Postal Service and are not sitting in an air conditioned cubicle during their work day.</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Harms CFC Charities</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
<u>950.501 Release of contributor information.</u>	<p><i>Section 950.501 Release of contributor information.</i></p> <p>Eliminates references to PCFO, and replaces those references with CCA. Requires federations to provide donor information to its member organizations in a specific time frame. Codifies CFC Memo 2003-2.</p>	<p>One of the biggest complaints from CFC charities is the length of time between when a pledge is made, and the receiving of donor information. Why not have this on a rolling basis (monthly for example), instead of waiting for the campaign to be concluded.</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>
<u>950.502 Solicitation methods.</u>	<p><i>Section 950.502 Solicitation methods.</i></p> <p>Prohibits fund raising at events and activities, eliminates references to specific CFC events and activities, and requires that Agencies obtain approval from ethics officials to approve all events and activities.</p>	<p>This proposed regulation is confusing on its face, when it “prohibits fund raising” at CFC special events. The Combined Federal Campaign is a fund raising program. Does this mean that employees can’t turn in a CFC pledge form at a CFC Kickoff, when the tradition at many agencies is for the Agency Head to do just that?</p> <p>This proposed regulation adds an undue burden to Federal agency ethics offices by mandating that all events be approved individually, while the current regulation states that the ethics rules be followed, and to obtain permission if there is</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		<p>any question about an event.</p> <p>For an agency that’s been conducting the world’s largest charity fair for decades, which describes the Pentagon Charity Fair why add an unnecessary layer to get approval for something that is now routine.</p>	
<u>950.503 Sanctions and penalties.</u>	<p><i>Section 950.503 Sanctions and penalties.</i></p> <p>Removes all references to PCFO and LFCC, and added references to CCA where appropriate.</p>	<p>In other sections, I make the case that the elimination of 184 LFCCs and 184 private sector PCFOs contractor organizations to be replaced with “one or more” Central Campaign Administrator (CCA) needs much more detailed plans and discussion before being implemented.</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>
<u>950.504 Records retention.</u>	<p><i>Section 950.504 Records retention.</i></p> <p>Changed PCFO reference to CCA. Updated years in sample dates.</p>	<p>In other sections, I make the case that the elimination of 184 LFCCs and 184 private sector PCFOs contractor organizations to be replaced with “one or more CCAs and “Regional Coordinating Committees” need more discussion on how it would actually work.</p> <p>There has been no discussion of what boundaries would define the “RCCs” and how they would assume the functions of the 184</p>	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		LFCCs. “CCAs” are Federal entities, while PCFO’s are private sector contractors to the government. There has been no discussion about the probability of having hundreds of new Federal positions approved.	
<u>950.505 Sanctions compliance certification.</u>	<i>Section 950.505 Sanctions compliance certification.</i> Corrects “unaffiliated” to “independent.” Corrects official name of OPM's Office of CFC (OCFC).		No opinion
<u>950. 601 Campaign schedule.</u>	<i>Section 950.601 Campaign schedule.</i> Eliminates references to National/ International applicants since all applications and eligibility process requirements apply to all charities. Eliminates references to PCFO and LFCC regarding specifics of local application review process which has been eliminated.	In other sections, I make the case that the elimination of 184 LFCCs and 184 private sector PCFOs contractor organizations to be replaced with “one or more” Central Campaign Administrator (CCA) needs much more detailed plans and discussion before being implemented. This function is currently performed by the 184 PCFOS, which are non-profit contractors to the government, and their primary fiduciary responsibility	<i>Back to the Drawing Board!</i> <i>Needs more public discussion</i> <i>This is a massive transfer of function from private sector non-profits to the Federal sector, with no information provided</i>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		<p>is to see that the CFC donor's gifts are sent to the correct CFC charity.</p> <p>There has been no discussion about how the additional workload of tracking gifts to 25,000 CFC charities will be handled by the four Federal payroll offices.</p> <p>One important way that the payroll offices could be used, and this was not discussed in the CFC-50 public meetings, is to use the payroll messaging capability to say "Thank you" to the CFC donors. This was not discussed at all in the CFC -50 public meetings.</p>	<i>about Federal budget, number of positions needed, timeframe, etc.</i>
<u>950.701 Payroll allotment.</u>	<p><i>Section 950.701 Payroll allotment.</i></p> <p>Eliminates references to paper pledge forms, which have been discontinued. Changes dates of payroll deductions to coincide with new extended solicitation period. Changes minimum pledge to \$1 per pay period per designated charity.</p>	<p>This affects a majority of Federal employees, and causes a particular hardship for those Federal employees who are not sitting at a desk in air conditioned room with a computer on their desk.</p> <p>More than 80% of Federal employees use the paper pledge form, even in locations where electronic giving exists. This is partially because the</p>	<p><i>Reject/ Bad Idea</i></p> <p><i>Harms CFC Charities</i></p> <p><i>Harms CFC donors</i></p>

FEDERAL REGISTER PROPOSED REGULATIONS - CFC	FEDERAL REGISTER – OPM COMMENTS	BILL HUDDLESTON ANALYSIS	RECOMMENDED ACTION
		pledge form itself is a marketing tool used by the CFC keyworkers.	
<u>950.801 Accounting and distribution.</u>	<p><i>Section 950.801 Accounting and Distribution.</i></p> <p>Outlines requirement for remittance and transmission of funds by payroll offices to CCA or charities. Changes references from PCFO to CCA, outlines requirements for distribution of credit card funds.</p>	In other sections, I make the case that the elimination of 184 LFCCs and 184 private sector PCFOs contractor organizations to be replaced with “one or more” Central Campaign Administrator (CCA) needs much more detailed plans and discussion before being implemented.	<p><i>Back to the Drawing Board!</i></p> <p><i>Needs more public discussion</i></p>

There are major areas that were addressed in the CFC-50 Commission Public Meetings and Final Report that are not addressed at all in the proposed CFC regulations, here's one:		ISSUES NOT ADDRESSED IN PROPOSED REGS:	
		<p>Value to the Federal Organization of Participation in the Combined Federal Campaign. The CFC-50 Commission concentrated on the CFC campaign from the non-profit's perspective, there was no testimony about the value of CFC participation to the sponsoring government agency.</p> <p>Modern organizations use Corporate Social Responsibility (CSR) principles to encourage teamwork, build skills sets, and develop a talented and dedicated workforce. All of these principles apply to the CFC, but there was no discussion of this in the public meetings, or in the testimony submitted as part of the CFC 50 Final Report.</p>	<p><i>Needs to be Addressed</i></p> <p><i>Needs more public discussion</i></p> <p><i>There was no discussion of this in the CFC 50 public meetings.</i></p>

Abridged CFC Glossary

(Since these terms are used so frequently in these proposed regulations):

FEDERAL ENTITIES	PRIVATE SECTOR ENTITIES	PERSONNEL
<p>OPM: – Office of Personnel Management (OPM) – federal agency with overall responsibility for all aspects of the Combined Federal Campaign. The OPM CFC Office has a small staff of approximately ten employees. OPM is responsible for the approval of all national and international charities to the CFC.</p> <p>LFCC: Local Federal Coordinating Committees (LFCC): Federal entity composed of the Federal employees who are responsible for campaign management and solicitations in their region. LFCCs are responsible for the selection of the PCFO in their region, and are the approval authority for all local applications to the CFC.</p> <p>Federal Executive Boards (FEB) and Federal Executive Associations (FEAs). In areas outside of the Washington DC area, regional entities responsible for regional government wide operations. There are 28 FEBs currently in existence, with FEBs in larger regional areas, e.g. Boston, Chicago, Los Angeles, etc. while the FEAs are in more remote areas, e.g. the three Alaskan FEAs (Anchorage, Juneau & Ketchikan), or the Western Massachusetts FEA.</p> <p>There are also 28 FEAs, but they are more informal, OPM reporting that: “FEAs are voluntary, less formal interagency groups that can facilitate communication and coordination among local agencies similar to an FEB. Please know that while OPM has oversight responsibility for FEBs, the agency (OPM) does not have oversight over FEAs. FEAs are not officially established by a Presidential Directive and don’t have reporting requirements.</p>	<p>CFC charity: A 501(c)3s non-profit that has registered for inclusion in the CFC. There are three types of non-profits: local, national and international. Financial reporting requirements increase as the size of the non-profit increases.</p> <p>Federation: A special type of non-profit that consists of 15 or more charities with some common interest, e.g. Children’s Charities of America as one example. More than 80% of the funds raised are from charities in federations.</p> <p>PCFO: Principal Combined Fund Organizations (PCFO) are contractors to the government, which currently have two major responsibilities: the overall campaign management including creation of campaign materials, and the disbursement of funds to the charities chosen by the Federal donor.</p> <p>PCFOs are currently required to be a 501 (c)(3 non-profit.</p>	<p>Agency Head: Top official in any government agency, by regulation is the person in charge of the agency’s CFC campaign.</p> <p>CFC Donor: Federal employee who gives to their favorite charities that are enrolled in the Combined Federal Campaign.</p> <p>Federal employee: Civilian or uniformed (military) employee of any Federal agency of the United States government, including employees of the U.S. Postal Service.</p> <p>Federal Retiree: former Federal employee or member of military services who receives retirement annuity.</p> <p>Federal Survivor Benefit Annuitant : spouse of retired Federal employee who receives survivor benefits after the death of their spouse.</p>

Combined Federal Campaign Leadership Development Roles
Federal CFC Volunteer Roles Matched
to SES Executive Core Qualifications (ECQs)

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[illegible]

ECQ 1, Leading Change:

Creativity & Innovation	x	x	x	x	x			x	x
External Awareness	x	x	x	x	x			x	
Flexibility	x		x	x	x				x
Resilience	x		x	x	x				x
Service Motivation	x	x	x	x	x	x	x	x	x
Strategic Thinking	x	x	x	x	x				
Vision	x	x	x	x	x				

	Executive	SES	Mgr.	Chair	Chair	Chair	Chair	Chair	Captain	Keyworker
<i>ECQ 2, Leading People:</i>										
Conflict Management		x	x						x	
Leveraging Diversity		x	x		x					
Developing Others	x	x	x	x	x			x	x	
Team Building	x	x	x	x	x	x	x	x	x	
<i>ECQ 3, Results Driven:</i>										
Accountability	x	x	x	x	x	x	x	x	x	x
Customer Service	x		x	x	x	x	x	x	x	x
Decisiveness	x		x	x	x	x	x	x	x	x
Entrepreneurship	x		x	x				x		
Problem Solving	x		x	x	x	x	x	x		
Technical Credibility	x		x	x			x			x
<i>ECQ 4, Business Acumen:</i>										
Financial Management										
Human Resources										
Management	Varies by agency		x	x	x		x			
Technology Management										
<i>ECQ 5, Building Coalitions:</i>										
Influencing/Negotiating	x	x	x	x	x				x	x
Partnering	x	x	x	x	x			x		
Political Savvy	x	x	x	x	x					

The CFC can be an integral part of an Federal agency's of a Federal agency's leadership development program.