

May 27th, 2013

Mr. Keith Willingham  
Director, Combined Federal Campaign  
U.S. Office of Personnel Management, Room 6484A  
1900 E Street NW, Washington, DC 20415

Dear Mr. Willingham:

The James P. Huber Veterans Foundation is a 501(c)(3) public charity founded in 2012 for the purpose of providing funding and equipment to support the recreation therapy programs conducted by the U.S. Department of Veterans Affairs Medical Center in Salt Lake City, Utah. These programs allow disabled veterans to participate in activities related to the outdoors, the arts, sports, and community events.

Fundraising for a small organization such as ours is challenging. This year we have applied to and been approved by the Intermountain Combined Federal Campaign (CFC), and we hope that this will lead to some donations from Federal employees.

We have recently learned of the Office of Personnel Management's proposed rule to amend the Combined Federal Campaign (CFC) regulations. While we applaud many of the proposed changes, there is one change that would drastically and negatively affect small charities such as ours. I refer to the proposed change in the way that administrative costs would be recovered.

OPM is proposing that the cost of the campaign be recovered through application fees paid by the charitable organizations that apply for participation in the Combined Federal Campaign. While this sounds reasonable at first glance, in actuality it would keep many small charities such as ours from participating in the Combined Federal Campaign at all. Even an application fee of a few hundred dollars would preclude us from applying, since there would be no way of knowing if we would be able to recoup this fee through donations.

We strongly urge the OPM to reconsider this proposed change.

Sincerely,

James P. Huber  
President  
James P. Huber Veterans Foundation

CC: Senator Orrin Hatch, Representative Jim Matheson, Senator Mike Lee