

## RIN 3206-AM68 Proposed OPM Regulatory Change

Official Response/Comment from the  
Greater Olympic Peninsula CFC  
Local Federal Coordinating Committee

1. ***Changing the Campaign Solicitation Period (1 Oct-15 Jan).*** – We welcome a change to the campaign solicitation period but recommend a change to earlier in the year vice later – 15 August to 15 November. We feel this change would create greater separation between various holiday charitable drives like food baskets, “Toys-For-Tots”, Christmas Angels, etc. as well as put greater distance between CFC solicitation and the Army/Air Force/Navy/Marine Corps Relief solicitations conducted in the spring. While we understand OPM sentiment in delaying the campaign season, our experience has shown that our donors prefer CFC activities completed prior to the holidays.
2. ***Immediate eligibility.*** – Agree 100%
3. ***Disaster Relief Program.*** - Agree 100%
4. ***Local Governance Structure.*** – Volunteer after volunteer describes working on CFC as one of the highlights of their career. Reorganizing to a regional level will remove that local campaign ownership so many federal workers feel towards “their” CFC. This takes the CFC 50 commission suggestion of a regional clearing house to an unreasonable level. Altering the structure and removing local contact and control of a campaign unnecessarily burden our donors and keyworkers. Managing a campaign without local resources would be a serious challenge and potentially lead to a lack of volunteers to serve. Additionally, finding agency representatives to serve on an RCC would be much more burdensome than serving on an LFCC. As an example, our local campaign currently takes approximately 2 days to review all of our local applications. If our “Regional” campaign covered just Washington State, that would be 9 campaigns and potentially 18 days of application review. This time requirement of course would increase exponentially based on the size of the region established by OPM for the RCC. Also the requirement that an organization chosen to serve as CCA be 501(c)3 but non-CFC participant would significantly limit the number of organizations qualified and seems unreasonable. Organizations currently serving as PCFO are able to serve & remain eligible for CFC donations without conflict of interest.
5. ***Electronic Donations.*** – The GOP CFC received 696 cash & check paper pledge donations totaling \$148,596, approximately 14% of total donations. An additional \$97K in cash/check donations were made at our events. While electronic donations are certainly increasing, our donors (75%) still prefer the paper pledge option. Eliminating this option may cause many donors to “just opt out.” Donors remain concerned with on-line donor tools and choose to donate in a manner they are most comfortable with. Reducing donor giving options is counter-productive to previous years efforts to increase their choices and thereby decreases the attractiveness to donating through CFC.

Additionally, many donors choose to support CFC by only donating at CFC events. Requiring electronic donations would eliminate the \$97K (5% of total) in event donations from our 2012 campaign. Elimination of cash donations would also negate the ability of a campaign to accept spontaneous donation collections (change/donation bottle at exchange cash registers, commissary check-out lines, etc.).

6. ***Training and Oversight.*** - Agree 100%
7. ***Elimination of Paper Processes.*** – Paper pledges remain the cornerstone of our campaign (75% of donors). While we are encouraging our donors to utilize our more efficient on-line option, not all federal employees have access to electronic resources, and removing paper options make participation less attractive to those donors. We believe continued encouragement will shift more donors to utilize our on-line option but it is essential to maintain a paper pledge option. Removing donor’s choices and making participation more difficult or cumbersome for ANY donor may facilitate a departure of those donors from participation. Our most successful campaigns have been those that have maximum number of keyworkers reaching out in one-on-one solicitation of donors.
8. ***Streamlining Campaign Administration.*** – While centralization on the surface appears to provide savings that will materialize in higher awards to charitable agencies, the unintended ramifications could prove disastrous to our CFC. Current regulation allows PCFOs to recoup “actual campaign expenses.” Allowing an RCC to contract to a “for profit” marketing firm could expand costs exponentially based on geographic area. The costs of processing donations “regionally” would certainly be significantly greater than local processing currently in place and resolution of donation irregularities would be more problematic long distance than locally. A cost benefit analysis should be conducted before this type of change is implemented CFC wide.
9. ***Administrative Costs.*** – Charging an application fee would drive smaller agencies out of the campaign and be unfairly advantageous to larger agencies/federations. It is also a smoke screen. Currently campaign expenses are completely visible to the donor. Moving the campaign expense into a fee recovered from applying agencies hides that the donor is still ultimately paying that fee through their donation and support of that agency. The current method of allocating campaign expenses is the most reasonable cost sharing method. If agencies are unable/unwilling to participate based on the fee, donors will have fewer choices and CFC will be less attractive. Also attempting to cover campaign cost out of an unknown “application fee” amount would be an accounting nightmare. Creating a campaign budget to cover costs would be next to impossible without knowing how many agencies would be applying to pay the application fee. As an applying agency, I would also expect that if I am paying a fee for inclusion, I would always receive a payback on my investment. Absent of return, I would have grounds for suit that I am not receiving the service/benefit for which I am contracting the CFC for, and that my “fee” was in essence being distributed to other agencies receiving designations.
10. ***Streamlined Application Process.*** - Agree 100%

**11. *Audit of Small Charities.*** - Agree 100%

**12. *Oversight of Federations.*** - Agree 100%

**13. *Payroll Deduction Disbursements.*** – Increased detail of information provided by payroll offices accompanying disbursements will benefit reconciliation and tracking/auditing of donations. A Centralized distribution point would be advantageous by reducing the number of entities that need to interact with any given payroll office and thereby increase personnel’s proficiency/expertise with resolving payroll disbursement issues. Placing disbursement responsibility onto payroll offices may require a significant increase in payroll office workload that could be detrimental to other payroll office duties.

Summary – we recognize and applaud OPM for their ambitious attempts at reorganization of the CFC to enhance the effectiveness of this world-wide effort. We caution however against any change that would reduce the attractiveness of CFC to donors or charitable agencies. We believe, and our experience has shown, donors prefer more choices, not less. We believe application fees will substantially reduce participation and further reduce donor choices. Our Universal Giving Pilot project for 2012 campaign is proof of this. Our data shows an increase of 645 donors using on-line options totaling \$320K in donations. Nearly 4% of donors chose a UG agency. Any change that could potentially drive agencies or donors away from participating should be avoided.

Respectfully Submitted,

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