JUSTIFICATION STATEMENT

Title of Information Collection: Combined Federal Campaign (CFC) Charity Application

A. Justification

- 1. All recognized 501(c)(3) voluntary health and welfare organizations must meet the requirements of Executive Order 12353 (March 23, 1982), 47 FR 12785 (March 25, 1982), 3 CFR 1982 Comp., p. 139, Executive Order 12404 (February 10, 1983), 48 FR 6685 (February 15, 1983), Public Law 100-202, and Public Law 102-393 (5 USC 1101 note) to be eligible for the privilege of soliciting contributions from Federal employees in the annual CFC. The final regulations, 5 CFR 950, published in the Federal Register on Friday, November 20, 2006 are attached.
- 2. Organizations wishing to participate in the campaign must file an application of certification with the Office of Personnel Management (OPM) annually to prove that they meet the eligibility requirements before receiving approval to participate. Without this information, OPM cannot make these determinations. Each applicant must complete one of the five applications, based on its circumstances (e.g. local services versus national/international services). Local charitable organizations must submit an application to their respective Local Federal Coordinating Committee (LFCC), the entity that oversees the campaign locally, for the same privilege to participate in the local campaign.
- 3. The collection of information does not involve the use of automated electronic, mechanical, or other technological collection techniques. The Office of CFC Operations is committed to implementing procedures in the application process in areas where it will reduce the burden of completing and processing the application. OPM plans to design an automated application for the 2011 campaign.
- 4. Duplication is minimized because local charity applicants need only make one application to apply to each campaign area.
- 5. The information does not involve small business or other entities.
- 6. CFC regulations require that participating charities apply on an annual basis. OPM and LFCCs would be unable to make eligibility determinations for each annual campaign if the application was submitted less frequently.
- 7. No such special circumstances exist for this information collection.
- 8. Notice of OPM's request for OMB clearance of the CFC applications were published in the June 5, 2009 issue, pages 27055-27056, of the Federal Register for public comment. The Office of CFC Operations (OCFCO) did not receive any comments. Before submitting the final version of the application, OCFCO

consulted with interested parties, including representatives of voluntary charitable organizations and federations.

- 9. Not applicable.
- 10. No assurance of confidentiality is provided to organizations applying to participate in the CFC for most of the information. With the exception of the audited financial statements, all information required is public information. Application documents are not released to the public without a Freedom of Information Act request.
- 11. We do not collect sensitive information with this information collection.
- 12. Each applicant is required to apply annually. Approximately 20,000 applications are completed annually, and we estimate that it takes approximately 3 hours per organization to provide the requested materials. The annual response burden is 60,000 hours.
- 13. Annual cost to respondents

•	Preparation of applications		
	3 hours at \$20 an hour	•••••	\$60
•	Misc. photocopying, typing, mailing, and overhead	 TOTAL	\$50 \$110
	\$110 x 20,000 applicants	IOIAL	\$2,200,000
	#110 x 20,000 applicants	•••••	Ψ2,200,000

14. Annual cost to the Federal government:

Staff review of applications:

	1600 hours at \$40 per hour		\$56,000
•	Misc. photocopying, typing, mailing, and overhead		\$1,500
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		TOTAL	\$64,000

- 15. The annual reporting burden has increased since the previous submission due to the increased number of applicants. In addition, former estimates were based on national/international applications reviewed by OPM. As a result of a recommendation from the Government Accountability Office, OPM has centralized part of the application review process and is able to provide more specific information that includes applications to local campaigns. The annual cost to respondents has not changed.
- 16. In accordance with 5 CFR § 950.801, during a period between December and January, as determined by the OPM Director, OPM will accept applications from organizations seeking to be listed on the national/international list of CFC charities. The Director will issue the National/International and International

- parts of the Charity List, based on application decision, by a date to be determined by OPM.
- 17. The Office of CFC Operations does not wish to display the form's expiration date on the face of the form. The national/international applications (Forms 1646 A and B) have submission deadlines of January 15 for the campaign year to which the organization is applying. The local applications (Forms 1646 C, D, and E) have deadlines that are determined by each local campaign. Applications received beyond the deadline are not accepted. Inclusion of the expiration date on the form may mislead the applicant as to when the application must be submitted.
- 18. There are no exceptions to the certification statement.

B. Collection of Information for Statistical Methods

This information does not employ statistical methods.