

## JUSTIFICATION STATEMENT

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

### A. Justification

1. All IRS-recognized 501(c)(3) voluntary health and welfare organizations and Department of Defense morale, welfare, and recreation (MWR)/Family Support and Youth Activities/Programs (FSYA/FSYP) 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 Wednesday, April 16, 2014 are attached.
2. Organizations wishing to participate in the campaign must annually file an application of certification with the Office of Personnel Management (OPM) 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 three applications, based on its circumstances (e.g. being an independent charity or federation member organization versus being a federation versus being an MWR/FSYA/FSYP organization). 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 Office of CFC will accept only electronic application submissions via the web-based CFC application system.
4. Duplication is minimized because local charity applicants need only make one application to apply to a campaign area. CFC All-Around Giving policy allows an organization approved by one campaign's LFCC to be listed in all campaigns (provided that charity's application is not denied by another LFCC).
5. The information does not involve small businesses or other entities.
6. CFC regulations require that participating charities apply on an annual basis; however, these regulations allow for an abbreviated application to be submitted two out of every three years. OPM and LFCCs would be unable to make eligibility determinations for each annual campaign if the application were 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 March 10, 2016 issue, page 12755, of the Federal Register for public comment. The Office of CFC (OCFC) received two comments recommending the addition of a “thank you statement” field that would facilitate immediate acknowledgement of electronic pledges. This recommended revision is included in the proposed ICR. Before submitting the final version of the application, OCFC 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. 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 20,500 applications are completed annually (20,000 submitting OPM Form 1647-A and -B, combined and 500 submitting OPM Form 1647-E). Furthermore, we estimate that the burden to the public will be significantly reduced by making this an online form, requiring approximately 2 hours per OPM Form 1647-A and -B and one hour per OPM Form 1647-E to provide the requested materials. The annual response burden is 40,500 hours.

13. Annual cost to respondents

<u>OPM Forms 1647-A &amp; -B</u>		
• Preparation of applications		
2 hours at \$20 an hour	.....	\$40
• Misc. photocopying, typing,		
mailing, and overhead	.....	\$15
		<u>\$55</u>
\$55 x 20,000 applicants	.....	\$1,100,000
 <u>OPM Forms 1647-E</u>		
• Preparation of applications		
1 hour at \$20 an hour	.....	\$20
• Misc. photocopying, typing,		
mailing, and overhead	.....	\$15
		<u>\$35</u>
\$35 x 500 applicants	.....	\$17,500
	TOTAL	<u>\$1,117,500</u>

14. Annual cost to the Federal government:
- Staff review of applications:  
1,600 hours at \$45 per hour ..... \$72,000
  - Misc. photocopying, data entry,  
mailing, and overhead ..... \$2,250
- TOTAL \$74,250
15. The annual reporting burden and the annual cost have decreased based on the decrease in the number of applicants since 2015 from 22,000 to 20,500. This is the burden published in 81 FR 12755 on March 10, 2016.
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 list of CFC charities. The Director will issue the Charity List, based on application decision, by a date to be determined by OPM.
17. The Office of CFC does not wish to display the form’s expiration date as it would confuse applicant charities. The application deadline will be posted on the system and is currently scheduled for January 31, 2016. 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.