

## JUSTIFICATION STATEMENT

Title of Information Collection: Combined Federal Campaign (CFC) Retiree Pledge Form (1654-B)

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection**

This is a request for a new collection -- for a CFC collection for retirees that merges two existing processes together.

Retirees have been permitted by CFC regulation to make one-time, unsolicited gifts to their favorite charities through the CFC. The EO 13743 (October 13, 2016) extended authority to permit CFC to solicit retiree giving and authorized OPM to collect allotments for CFC out of monthly deductions from retirement annuities.

Currently, OPM Retirement Services processes allotments out of annuity payments – usually for mortgages, car payments and other recurring commitments of retirees. This will join together the allotment process with the CFC process.

OPM is authorized to collect the information on this form based upon the authority provided via Executive Order (EO) 12353 (March 23, 1982), as amended by EO 13743 (October 13, 2016), and in Federal Regulations 5 CFR 950 (January 1, 2017). In addition, Executive Order 9397 (November 22, 1943), as amended by EO 13478 (November 18, 2008), permits us to collect your Social Security Number (SSN).

OPM created Form 1654-B to collect this data from retirees who want to voluntarily continue to participate in the CFC program and who elect to use a paper form. There is no statutory deadline for this data collection.

OPM also is adding options for retiree giving to the Online Donation System ([cfccharities.opm.gov](http://cfccharities.opm.gov) or [www.opm.gov/showsomelovecfc](http://www.opm.gov/showsomelovecfc)). The information collected will include:

- 1) Personal data about the retiree making a donation through CFC
- 2) Authorization for type of payment option selected
  - a. One time via paper check, e-check, credit card or debit card
  - b. Recurring gift via annuity or electronic payment options
- 3) List of charities designated on the allotment
- 4) Election by the donor if he/she authorization OPM to disclose contact information details to the charity or charities

**2. Indicate how, by whom, how frequently, and for what purpose the information will be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information provided is used by OPM to accurately receive, process, acknowledge, and account for donations to the charities approved to participate in the CFC; and to make payments to the charitable organizations to which retirees select.

The collection of this information by OPM will be via both electronic user interface or paper forms for the next five years. Paper-based collection is being phased out in five years according to regulations in 5 CFR 950.102: “For the first five campaign periods after implementation of these regulations, LFCCs will be permitted to still provide donors the option of using non-electronic pledging based on guidance issued by OPM.”

Campaign implementation began in 2017. The first fully electronic campaign will begin in the fall of 2022. At that time, the collection of all CFC pledges will be 100 percent electronic from both employees and retirees, reducing the burden on the government and the retiree/contributor.

The retiree will provide the payment source, charity designation information, and donor information to OPM through our Central Campaign Administrator (The Give Back Foundation and its sub-contractor the Total Administrative Services Corporation – TASC). The information will be collected solely to honor voluntary charitable gifts made by retirees and forward those funds to designated charities. Information will be shared with the authorized payment source (annuity, bank, or credit card company) and the recipient charity or charities if the donor authorizes such release.

This is consistent with the ways OPM uses employee contribution information currently and retiree information for one-time gifts in the past.

**3. Describe whether, and to what extent the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. Also describe any consideration of using information technology to reduce burden.**

The collection of this information by OPM will be via both electronic user interface or paper forms for the next five years based upon regulations in 5 CFR 950.102: “For the first five campaign periods after implementation of these regulations, LFCCs will be permitted to still provide donors the option of using non-electronic pledging based on guidance issued by OPM.”

The information will be collected electronically on [cfcgiving.opm.gov](https://cfcgiving.opm.gov) and/or via a paper form (OPM 1654-B). Use of paper forms will end no later than January 15, 2022 (the latest possible date for the conclusions of the Fall 2021 Open Season).

Paper forms will be submitted to OPM via mail through the Central Campaign Administrator:

**CFC Processing Center  
P.O. BOX 7820  
Madison, WI 53707-7820**

Retirees using paper forms are only required to submit one copy. The pledge forms are a single printed page. Retirees are advised to make one copy for their records.

Respondents who itemize their charitable contributions on the annual IRS Form 1040 (Schedule A) should retain records according to tax deadlines. All respondents are advised to retain a copy of the form for their records before submission to the CFC Processing Center.

Contribution Information is only collected annually during CFC Open Season. A campaign may be conducted only during the period running from September 1 through January 15, as determined by the Director. This collection frequency aligns with the employee campaign as specified in 5 CFR 950.

Starting in 2022, the collection will be 100 percent electronic from both employees and retirees, reducing the burden on the CFC and the retiree/contributor.

The retiree will provide the payment source, charity designation information, and donor information to OPM through our Central Campaign Administrator (The Give Back Foundation and its sub-contractor the Total Administrative Services Corporation – TASC). The information will be collected solely to honor voluntary charitable gifts made by retirees and forward those funds to designated charities. Information will be shared with the authorized payment source (annuity, bank, or credit card company) and the recipient charity or charities if the donor authorizes such release.

**Project Schedule:**

- Information will be collected annually during the CFC Open Season as described above – starting no sooner than September 1 and ending no later than the next January 15.
- Transactions with banks, credit cards, and other financial institutions as well as with retiree payment systems will begin following January 15 (the end of the CFC Open Season).
- Contributions will be forwarded to the designated charities starting April 1. Annual, recurring contributions will be sent in monthly installments ending the following March. One-time gifts will be sent on April 1.

**4. Describe efforts to identify duplication.**

There is no duplication because this is a new data collection. Starting in the fall open season of 2022, the collection is anticipated to be 100 percent electronic from both employees and retirees. The paper version of this form will be eliminated, reducing the duplicate means for giving, as well as reducing the burden on the CFC and the retiree/contributor.

**5. If the collection of information impacts small businesses or other small entities (Item five of form OMB 83-I, the Paperwork Reduction Act Submission form), describe any methods used to minimize burden.**

The information will only be submitted into ROCIS.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Prior to the October 2016 EO, CFC regulations only allowed current Federal employees to be solicited, leaving out active solicitation of retirees. Retirees could not have CFC donations withheld from their annuity. The CFC 50 Commission recommended that this impediment to greater donor involvement should be removed through changes that would allow the active solicitation of retirees and allow a method for retirees to make pledge allotments via their annuity.

Federal employees pledged more than \$162 million to their favorite local, national and international charities through the CFC in 2016 (the most recently completed annual solicitation). Adding a retiree option may help the CFC program double the amount of money contributed to participating charities.

Making this option available to retirees may lead to the potential doubling in the amount of charitable pledges collected by the CFC. With this new collection, approximately 5 million civilian and military retirees will have the option to support their favorite charities through the CFC via paper pledges or electronic means and/or annuity deductions. Many of these retirees had supported their favorite charities through the CFC. Individuals and groups have asked OPM for years to allow solicitation of retiree giving via allotment. This collection now opens up a confidential mechanism familiar to retirees to support a vetted list of charities.

Initial research conducted through the National Association of Federal Employees (NARFE) suggested many retirees would be willing to participate in the CFC if provided the means to do so. The study was included as a part of the July 2012 CFC – 50 Commission Report to OPM (<https://www.opm.gov/combined-federal-campaign/cfc-50-commission/2012-report.pdf>).

The NARFE study demonstrated the CFC stands to potentially gain considerable increases in pledges to charities if retirees can be solicited and their donations deducted from their annuity payments.

- More than 80 percent of retirees responding to the NARFE study reported that they supported charity through the CFC while a Federal employee.
- Of the respondents, more than 25 percent would elect to continue either a monthly or annual allotment from their annuity.
- The survey indicates that CFC stands to raise as much as an additional \$166 million for charities when this collection begins. This could more than double the overall amount of contributions the program collects for charities.

**7. Explain any special circumstances that would cause an information collection to be conducted in certain manners (as listed Special Circumstances):**

None apply.

**8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR § 1320.8 (d), soliciting comments on the information collection before submission to OMB.**

On August 22, 2017, a 60-day Federal Register Notice was published at [FR Doc. [2017-17763](#) Filed 8-21-17; 8:45 am], page 39919.

(<https://www.federalregister.gov/documents/2017/08/22/2017-17763/submission-for-review-combined-federal-campaign-annuitant-pledge-form-opm-form-1654-b>)

No comments were received from the public.

On October 30, 2017, a 30-day Federal Register Notice was published at [FR Doc. [2017-23534](#) Filed 10-27-17; 8:45 am], page 50170.

<https://www.federalregister.gov/documents/2017/10/30/2017-23534/submission-for-review-opm-form-1654-b-combined-federal-campaign-federal-retiree-pledge-form>

**9. Explain any decision to provide any payment or gift to respondents, other than enumeration of contractors or grantees.**

There will be no payment of any gift to the respondents. CFC organizations do not provide goods or services in whole or partial consideration for any contributions made to the organizations via the CFC.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Confidentiality is assured through state-of-the-art controls put in place on the Online Donation System with the only exception being if the donor authorizes disclosure to the charity/charities designated. See OPM SORN 20 and PIA for details. The SORN and

PIA links are <https://www.opm.gov/information-management/privacy-policy/sorn/2013-opm-statement-of-routine-users-for-opms-internal-and-central-systems-of-records.pdf>.

The CFC Privacy Impact Assessment is at: <https://www.opm.gov/information-management/privacy-policy/privacy-policy/cfc-pia.pdf>

The Privacy Act (5 USC 552a) applies to a collection in addition to the confidentiality protections promised in 5 CFR 950.

Section 7(a)(1) of the privacy act also applies to the collection of the social security number of any donor contributing via annuity deduction: Any Federal, State or local government agency which requests an individual to disclose his social security account number shall inform that individual whether that disclosure is mandatory, by what statutory or other authority such number is solicited, and what uses will be made of it. The submission of a social security number is mandatory for employees giving via an annuity deduction. No social security number is required from participants making gifts by check, credit/debit card, or ACH/e-check.

Information provided by retirees will be used solely by OPM to manage the gift transaction as authorized. Some statistical program highlights and performance measures will be made available to the public and the government as an annual agency report on CFC. All of this will be based upon statistical reports and no private data will be included in this report. The report will include:

- Total amount pledged by retirees
- Total number of retirees pledging
- Type of pledge (one-time or recurring)
- Source of pledge (annuity, credit card, check or electronic check)
- Average Gift
- Distribution to charities

With authorization from the donor, OPM may also share the information provided to us with local, national, or international charitable organizations or federations. A complete list of routine uses can be found in the system of records notice for OPM 20, National CFC System.

The information provided will be used to fulfill the donor's intent to make contributions to specific, CFC-approved charities. In addition, overall pledge summary reports and designation summary reports that contain no personally identifiable information will be used for internal program use and to report to the government and the general public. Donation trends from these reports will help OPM evaluate the overall retiree giving program and may be taken into account for future revisions to CFC regulations (5 CFR 950) and OPM memo guidance.

Performance measurements will be used when OPM conducts its mandatory five-year review of the regulatory reform as mandated by OMB. Based upon the review, additional regulatory changes or management changes may be enacted.

Privacy concerns have been addressed in a number of ways. To protect PII, statistical reports on giving will be saved and reported on a separate secure web site. Giving data is secured on [cfcgiving.opm.gov](http://cfcgiving.opm.gov). Overall pledge summary reports and designations reports will be available to authorized users only on [cfccharities.opm.gov](http://cfccharities.opm.gov). No personal data will be moved to the reporting site. Only aggregated data will be reported. There is no peer review expected or anticipated.

When entering personal information, the OPM Online Donation System is FISMA-compliant, to include having been issued a FIPS 199, and utilizes a FedRAMP-certified data center.

- 1) The Federal Information Security Management Act (FISMA) requires agencies to “develop, document, and implement an agency-wide program to provide information security for the information and systems that support the operations and assets of the agency, including those provided or managed by another agency, contractor, or other sources.”
- 2) Part of the process dictated by FISMA is to categorize all information and information systems in accordance with Federal Information Processing Standards Publication 199 (FIPS 199). The objective of this categorization is to provide appropriate levels of information security according to a range of risk levels identified. The FIPS 199 categorization is completed early in the process so as to inform the rest of the FISMA requirements to ensure the appropriate levels of information security are achieved.
- 3) FISMA standards further require penetration testing and system scans performed by a third party as well as the development of contingency plans and a battery of other plans and assessments in order to be granted authority to operate (ATO).
- 4) The Federal Risk and Authorization Management Program (FedRAMP) is a government-wide program that provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services. Under these guidelines, for example, OPM requires use of a government cloud; not a public cloud. OPM conducted site visits of the data center as well as scans of the cloud platform provider.

Because this system is contracted and overseen directly by OPM, it is the first CFC pledging system to be subjected to this level of scrutiny. In addition to this, OPM requires continuous monitoring and periodic scans. The system is also benefiting from the Inspector’s General audit of the system.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

No data is collected that is of a sensitive nature such as sexual behavior, religious beliefs, and other matters commonly considered private.

**12. Provide estimates of the hour burden of the collection of information.**

Providing this information takes an average of 30 minutes per response to complete, including the time for reviewing instructions, getting the needed data, and reviewing the completed information collection title.

| Form Name               | Form Number | No. of Respondents | No. of Responses per Respondent | Avg. Burden per Response (in hours) | Total Annual Burden (in hours) | Average Hourly Wage Rate | Total Annual Respondent Cost |
|-------------------------|-------------|--------------------|---------------------------------|-------------------------------------|--------------------------------|--------------------------|------------------------------|
| CFC Retiree Pledge Form | OPM 1654-B  | 250,000            | 1                               | .5                                  | 125,000                        | N/A                      | N/A                          |

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.** The cost burden to respondents would be minimal. Beyond obtaining the form and researching their favorite charities from the approved database, a donor who pledges electronically will have no further costs. If a donor uses a paper form, they would have the minimal costs of mailing in the form in a first-class letter envelope.

There are no capital or start-up costs. Costs were borne in the original deployment of the system for Federal employees.

There are no on-going maintenance or services needed. Costs are included in the on-going maintenance and service of the Online Donation System for employees.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.**

The annual cost to the Federal Government is approximately \$1 million. Most of the costs to implement this new system will be paid for by fees paid by charities which voluntarily apply to be a part of the CFC. This estimate accounts for costs from the following areas: (1) designing, printing, and distributing the paper form and



highlighting the electronic option; and (2) OPM employee information collection and processing time.

**15. Program Changes or Adjustments to the Information Collection Request**

The program change which made this required was a new Executive Order issued October 13, 2016 that expanded OPM's authority to solicit and collect information within the CFC ([EO 13743 October 13, 2016](#)).

No other special circumstances exist for this information collection.

**16. Plans for Publication Information Collection Results**

OPM will compute and release overall program statistics. These will be disclosed by OPM at the end of each annual campaign period and made available on [www.opm.gov/cfc](http://www.opm.gov/cfc). Data released will include:

- Total number of retirees giving
- Total amount donated by retirees
- Method of giving
  - (Annuity/Check/Credit Card)
- Timing of Gift
  - (One-time or Recurring)
- Average Gift
- Distribution to charities

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display may be inappropriate.**

Not applicable.

**18. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83**

Not applicable.