

## JUSTIFICATION: STATEMENT A

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

#### A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

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, were published in the Federal Register on Wednesday, April 16, 2014.

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

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. 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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The Office of CFC will accept only electronic application submissions via the web-based CFC application system.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Duplication is minimized because local charity applicants need only make one application to apply to a campaign area. CFC policy allows an organization approved by its local campaign's LFCC to be listed in all campaigns.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize.

The information does not involve small businesses or other entities.

6. Describe the consequence to Federal/DHS program or policy activities if the collection of information is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

No such special circumstances exist for this information collection.

8. Federal Register Notice: Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB

Notice of OPM's request for OMB clearance of the CFC applications were published in the March 12, 2019 issue, page 8918, of the Federal Register for public comment. The Office of CFC (OCFC) received comments from two commenters:

- One commenter recommended a series of significant changes to questions surrounding volunteerism. As these changes would require policy changes which would impose further requirements on applicant charities (e.g. requiring charities to solicit for volunteers through the CFC and requiring that charities provide an estimate of the monetary value of an hour of volunteer time).
- The second commenter recommended a series of changes to questions which were unnecessary as the addition or change already exists (e.g. adding help links and asking for descriptions of service); or which go beyond OPM's authority to ask (e.g. adding certifications).

These proposed changes were not adopted in the present ICR. Before submitting the final version of the application, OCFC consulted with interested parties, including representatives of voluntary charitable organizations and federations.

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

Not applicable.

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

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. 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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

We do not collect sensitive information with this information collection.

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

Form Name	Form Number	No. of Respondents	No. of Responses per Respondent	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
CFC	OPM 1647A	7,400	1	2	10.75	\$159,100
CFC	OPM 1647 B	400	1	2	10.75	\$8,600
CFC	OPM 1647 E	200	1	2	10.75	\$4,300
Total		8,000				\$172,000

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

We believe each application will incur a cost no greater than \$21.50. These costs are related to miscellaneous photocopying, typing, mailing, and overhead. These costs are not required for submission. At \$21.50 per application, the estimated total cost burden is \$172,000.

14. Provide estimates of annualized cost to the Federal Government.

Staff review of applications: 1,280 hours at \$45 per hour	\$57,600
Misc. photocopying, data entry, mailing, and overhead	<u>\$2,250</u>
TOTAL	\$59,850

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping **hour** and **cost** burden.

The annual reporting burden and the annual cost have decreased based on the decrease in the number of applicants since 2016 from 20,500 to 10,000. This is the burden published in 84 FR 8918 on March 12, 2019.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

In accordance with 5 CFR §950.601, 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. If seeking approval to not display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

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, 2020. 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. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions".

There are no exceptions to the certification statement.