SUPPORTING STATEMENT

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

The U.S. Office of Personnel Management seeks the review and approval of the renewal of the information collected for the Federal retiree pledge form. The current approval is due to expire in November 2020. However, we moved up the renewal of the form, so the new document is ready for the start of the 2020 Campaign Year solicitation period that begins on 21 SEP 2020.

CFC Campaign Solicitation Period September 21, 2020, through January 15, 2021
As we anticipate a new CFC Solicitation Period, we would like to make this renewed form available as soon as possible due to the on-going humanitarian needs which have arisen due to COVID-19. Retirees have shown that participating in the CFC to be a philanthropic activity that they would like to continue after their public service career ends. From 2017 through 2019, retirees have contributed nearly $5 million.

The CFC provides retirees a safe, secure, and effective way to respond to the humanitarian needs and causes that they want to support.

Normal Collection Period
CFC Solicitation Period is from September 21, 2020, through January 15, 2021. The OPM Director will announce dates for the 2021 and 2022 Solicitation Period in the summer of the coming years. Approval of Form 1654-B provides a convenient method for retirees to give, and it expands the number of people who may support the 6,000 approved charities on the CFC list this year.

While employed in Federal Service, retirees are used to a CFC open season, which extends from the late summer through early winter.

Since no comments came in during the 60-day notice period or the 30-day comment period, which ended August 14, 2020, OPM Office of the Combined Federal Campaign requests using the form immediately.

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.

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). Also, Executive Order 9397 (November 22, 1943), as amended by EO 13478 (November 18, 2008), permits us to collect your Social Security Number (SSN).

Retirees have always 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 already processes allotments out of annuity payments – usually for mortgages, car payments, and other recurring commitments of retirees. The CFC pledge payments joined the allotment process with the 2017 campaign year and shall continue annually.

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

The information provided is primarily collected and 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 choose to donate.

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 collection of this information by OPM will be via both electronic user interface or paper forms for the next five years. Starting in 2022, OPM plans to make this collection 100 percent automated, 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 data 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.

The information collected may be disclosed as a “routine use” to the retirement service (e.g., OPM Retirement Services, the Defense Finance and Accounting Services Retiree Pay, or Department of State retiree pay system), for contributors who choose to make a recurring gift via a deduction from an annuity; or to credit card companies, banks, or other financial institutions, for a one-time or recurring donation (using the CFC’s online option) via credit card, electronic check, or automatic deduction from a commercial, financial account.

The collection methods are consistent with the ways OPM uses employee contribution information currently and retiree information for one-time gifts in the past.

The information collection relies heavily upon the deployment of the online user interface via the OPM Charitable Application (cfccharities.opm.gov) and Online Donation System (cfcgiving.opm.gov). Retirees can create a custom profile within that system.

The system was developed based upon the recommendations of the CFC 50 Commission and is consistent with the revisions to 5 CFR 950. It allows OPM to strengthen the integrity, the operation, and effectiveness of the CFC while over time, lowering costs, increasing confidentiality, increasing transparency, and expanding the donor pool.

Any retirees not using the Online Donation System can use the paper form OPM 1654-B for the five campaign years starting in Fall 2017. The form will be available locally through contractors and also via the internet (www.opm.gov/cfc). After 2021, OPM may discontinue the availability and use of a paper form following a review of the 2017 regulatory changes.

OPM will provide summary reports about CFC giving and the distribution of funds by the spring of the year following the campaign on our web site.

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.

There is no duplication of any collection from retirees for this purpose.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

The information will come only from individuals, and there will be no impact on small businesses.

6. Describe the consequence to the Federal 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.

If the Government does not collect the retiree pledge information, retirees who have been asking about the continuation of this program will be frustrated. Thousands of retirees who pledged through CFC from 2017 through 2019 will not have this confidential, secure, and transparent means to give to a list of screened charities. According to a study by the National Association of Retired Federal Employees (NARFE) showed that allowing this program to extend to retirees would result in millions of dollars raised for charities. The actual performance bears out this study in the results reported below.

OPM conducted the collection annually consistent with Federal tax years. If the Government performed the collection less frequently, there would be a disruption in the participation of the program, with a diminished benefit to retirees and charities.

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 promise, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
   • requiring respondents to submit proprietary trade secrets, or additional confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

   None apply.

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

OPM offered the general public and other federal agencies a 60-day comment period for them to take the opportunity to comment on the renewal of the information collection request for Combined Federal Campaign Retiree/Annuitant Pledge Form OMB Control No. 3206-0271, which include OPM Form 1654-B. On April 14, 2020, OPM published the 60-day Federal Register Notice at [FR Doc. 2020-07766 Filed 4-13-20; 8:45 am], page 20726 – 20727. (https://beta.regulations.gov/document/OPM_FRDOC_0001-1594). The public made no comments by the June 15, 2020 deadline.

On July 14, 2020, OPM published a follow-up 30-day Federal Register Notice at [FR Doc. 2020-15099 Filed 7-13-20; 8:45 am], page 42444 - 42445. https://beta.regulations.gov/document/OPM_FRDOC_0001-1638. The public made no comments by the August 14, 2020 deadline.

These results are similar to the initial comment periods when the Form 1654-B was approved. (https://www.federalregister.gov/documents/2017/08/22/2017-17763/submission-for-review-combined-federal-campaign-annuitant-pledge-form-opm-form-1654-b)

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

There is 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.

OPM assures confidentiality through state-of-the-art controls put in place on the Online Donation System. The only exception is if a retiree-donor authorizes disclosure of specific details to the charity/charities designated. See OPM SORN 20 and PIA for more information.

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 or voluntary, by what statutory or other authority such number is solicited, and what uses will be made of it.

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 is in the System of Records Notice for OPM 20, National CFC 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. 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.

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

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential

respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
c. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

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**	**$0 Retirees have no wage rate**	**$0**

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

The cost estimate should be split into two components: (1) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information to keep records for the government, or (4) as part of customary and usual business or private practices.

Cost to the Respondent: 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 expenses of mailing in the form in a first-class letter envelope.

There are no capital or start-up costs.

There are no on-going maintenance or services needed.

14. Provide estimates of annualized cost to the Federal Government. Also, describe the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Costs to the Government: Retiree giving make up slightly more than 1.5 percent of all CFC Giving. Based on the documented costs for the overall CFC program to raise and distribute the funds, the portion of the program costs attributed to these amounts to an estimated $408,158 out of overall program costs of $26,332,793. Costs are related to standard labor costs for government employees and contractors, Other Direct Costs (for printing and distributing pledge forms and operating the CFC Giving and Charity portals), and costs related to distribution of pledges and reports to participating charities. Costs are covered through application, listing, and distribution fees charged to the charities. OPM uses no appropriated funds to operate the CFC other than for a staff support.

Because this is an extension of an employee program to retirees, the added expenses are minor and incremental as shown above. OPM and its contractors make the forms available for download so there are limited printing costs. OPM already incurred the charges for design, deployment, operations, and maintenance of the system for employees, so there are no further costs for system development. Some customer support would be needed to answer questions from retirees. However, these contractors are already in place for the employee campaign.

Charity application and distribution fees recover the costs incurred to implement this program. Federated groups and independent charities pay these fees (and a listing fee) to get approved for the annual CFC charity list. OPM computes and announced the yearly application and listing fees in October/November in the year before the application to the campaign. OPM sets the distribution fee before the government distributes the contributions to federated groups and charities.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I. Changes in hour burden, i.e., program changes or adjustments made to annual reporting and recordkeeping **hour** and **cost** burden. A program change is the result of deliberate Federal government action. All new collections and any subsequent revisions of existing collections (e.g., the addition or deletion of questions) are recorded as program changes. An adjustment is a change that is not the result of a deliberate Federal government action. These changes that result from new estimates or actions not controllable by the Federal government are recorded as adjustments.

The program changes which made this required was a new Executive Order issued on October 13, 2016, that expanded OPM's authority to solicit and collect information within the CFC. No other exceptional circumstances exist for this information collection.

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 schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Overall statistics will be disclosed at the end of the campaign period and made available on www.opm.gov/cfc. No complex analytical techniques will be used. Data released will include:

- Method of Giving
- Timing of Payments
- Total Pledges
- Average Gift

Schedule:

- Pledges made: September 21, 2020, through January 15, 2021 (Dates for subsequent years will be determined and announced by the Director, OPM.

- Deductions from annuity payments: February 2021 through January 2022. Payments will always be in the 12 months following the end of the CFC solicitation period.

- OPM releases reports on contribution levels and charity designations between March and May of the year following the campaign pledge period. However, charities may check weekday totals in the CFC system on demand.

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

The Office of the Combined Federal Campaign is the lone processor of the data collected on these ICRs from a potential user base of approximately 1 million civilian retirees/annuitants and about 2.5 million military retirees.

The substance of each information collection does not substantively change at each OMB renewal cycle, but according to infrequent changes in regulations (5 CFR 950). Any forms are printed and published (internet, intranet, and on-board systems) through various CFC Zones, social media channels, and Federal departments or agencies for distribution to and implementation by retiree/customers.

According to title 5 CFR 1320.8(b)(1), it would not be appropriate to display the OMB clearance expiration date where the form will not be revised for the foreseeable future (e.g., because it is used to collect applicant, annuitant, or beneficiary information required by long-standing statutory provisions), where the use of the paper form is prevalent, and where, accordingly, it will be expensive and burdensome to restock the paper forms inventory with a new version.

Last year, the overwhelming number of donors contributed through electronic means. We do not display an expiration in the web-based system for employees—only the annual authorization statement changes.

The Office of the CFC already updates the annual form with the authorization to deduct gifts from the users' retirement annuity every year. By adding the OMB clearance expiration date to the current format, the retirees using the form may be confused with the actual times the annuity deduction will take place and the form expiration date when these are different.

Display of the OMB expiration date may lead to additional and unnecessary duplicate submissions by customers, possible mistiming for annuity deductions, and increasing calls to the program office and contractor's customer service phones and e-mail accounts.

Therefore, we seek approval to not display the OMB clearance expiration date on the forms and to communicate version changes to the public via the revision date

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.

There are no exceptions to the certification statement.