U.S. Fish & Wildlife Service - Ethics Program



Combined Federal Campaign

Factsheet

September 2017

The Combined Federal Campaign (CFC) is the only authorized solicitation of employees in the Federal workplace on behalf of charitable organizations. The CFC rules are administered by the Office of Personnel Management (OPM) through the regulations at <u>5 CFR 950</u>. The CFC campaign is conducted during a designated period, generally from September through January 15 each year. The OPM Director also may grant Federal agencies approval to authorize special solicitations of Federal employees, outside the CFC campaign, in support of victims of emergencies and natural disasters. The Department of the Interior (DOI) is responsible for authorizing and providing implementation guidance regarding a special solicitation of DOI employees. (See: OPM CFC Frequently Asked Questions for additional information.)

The CFC regulations apply only to fundraising activities in the Federal workplace on behalf of charitable organizations. They do not apply to the collection of gifts-in-kind, such as food, clothing, school supplies, and toys, or to the collection of funds among employees for the benefit of other employees. Gift-in-kind collections may take place any time of year as allowed by the Service. The collection of funds among employees for the benefit of other employees may be conducted consistent with Federal ethics laws and regulations. (Consult your <u>Servicing Ethics Counselor</u> for guidance.)

WHO and HOW you ask for donations:

- <u>DO</u> ensure that all contributions are voluntary and that donors are aware that they may keep their contributions confidential.
- **DO NOT** solicit subordinate employees. (However, supervisors may encourage participation.)
- <u>DO NOT</u> ask for information about subordinate participation. (If you are a CFC keyworker, do not share contributor lists or individual donation information with supervisors or others outside of the Service CFC coordinating team.)
- <u>DO NOT</u> solicit contractor personnel or other non-Federal persons present on Federal property. (However, unsolicited contributions by these individuals may be accepted)
- **DO NOT** solicit donations from outside organizations.
- **DO NOT** set individual employee dollar goals or quotas.

General guidelines for non-solicitation events

The CFC regulations encourage non-solicitation events that build support for the CFC (i.e., campaign kick-off, victory events, and award ceremonies for employees who have demonstrated leadership qualities in the CFC campaign.) All special CFC events and associated prizes or gifts must be approved in advance by your <u>Servicing Ethics Counselor</u>. In January 2017, the CFC rules changed to prohibit fundraising and the collection of funds at these events. (See: <u>5 CFR 950.502</u>.) Following are guidelines that apply to all CFC events:

- DO hold special events to generate interest in the CFC.
- **<u>DO</u>** obtain approval by the appropriate agency official and ethics counselor before the event.
- **DO** ensure that the events are open to all individuals even if they don't donate to CFC.
- <u>DO</u> allow contract employees to participate in CFC events. However, their time cannot be charged to the government. Never solicit contractors to participate in any way in CFC events.
- DO use only a reasonable duration of government time to conduct CFC events.
- **DO** have information available regarding the process for making a pledge.



Combined Federal Campaign

- <u>DO</u> allow multiple charities to present information at the event or at information tables. Rotate these opportunities each year among different charities to prevent any appearance of favoritism.
- <u>DO NOT</u> raise or collect funds at the special CFC event. All donations should be collected through the pledge process.
- <u>DO NOT</u> use your official position, title or authority to endorse a charitable organization, or to give the appearance of government sanction of a particular charity. (<u>Note</u>: If you are an Officer or Board Member for a CFC charitable organization, you must not be involved in any official matters that might impact that charitable organization's financial interests. See <u>5 CFR 950.109</u>.)
- DO NOT suggest or specify a particular charity for employees to include on pledge forms.
- **DO NOT** charge food or entertainment for a special event to the CFC.

Additional guidelines for events involving prizes or gifts to employees:

- **DO** offer free prize tickets to **all** attendees at a non-solicitation event, even if they do not make a CFC donation. (The CFC regulations prohibit the selling of these tickets.)
- <u>DO</u> offer prizes that are modest in nature. Examples include: lunch with an agency official, an agency parking space for a specific time period, or a gift of minimal financial value. Do not offer personal services such as dog-walking, pet sitting, babysitting, etc.

Example 1 (kick-off event): Susan, a Service employee, is a member of the Board of Directors for the "Kids' Book Bank", a community non-profit organization. The Book Bank is a designated CFC charity. Susan plans to ask the local Service CFC coordinator if the Book Bank could be highlighted at the CFC kick-off event. She also plans to offer her service as the spokesperson for the Book Bank at the event. Is she allowed to do so?

Answer: No. Federal criminal laws prohibit Susan from representing a charity or other third parties before the Federal government. Also, she is prohibited from using her official position, title or authority to endorse a charity or to give the appearance of government sanction of the charity. So she should not ask the Service CFC coordinator to include the Book Bank at the CFC kick-off event. She also would not be allowed to represent the Book Bank at the kick-off event. Someone else must introduce the organization.

Example 2 (raffle): Bob, a Service employee, organizes a raffle that will be open only to Service employees who buy a \$5 raffle ticket. Bob plans to give the proceeds of the raffle ticket sales to the "The Boys and Girls Clubs" which is a designated CFC charity. The winner will receive two tickets to a professional basketball game. (Bob plans to ask a retired Service employee to donate his two premium stadium seats for the raffle.) The seats are worth \$300 each. Is this allowed? **Answer:** No. This proposed raffle is not an appropriate CFC event for many reasons. First, CFC non-solicitation events cannot include the collection of funds (\$5 raffle ticket). Second, the event violates the prohibition against gambling in the workplace. Third, the event does not comply with the CFC rules which require that events be open to all Service employees, regardless of CFC contribution or participation. Fourth, Federal employees are prohibited from soliciting donations from outside sources (former employees are considered outside sources). Fifth, the proposed prize value is excessive. CFC event "prizes" must be reasonable in value and modest in nature.

Instead of the basketball tickets, Bob could raffle the opportunity to have lunch with the Regional Director (provided that the Regional Director agreed!) or some modestly priced item, so long as no funds are required to obtain a raffle ticket.