

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



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CFC MEMORANDUM 2010-5

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**TO: LOCAL FEDERAL COORDINATING COMMITTEES AND
PRINCIPAL COMBINED FUND ORGANIZATIONS**

**FROM: KEITH WILLINGHAM
DIRECTOR, COMBINED FEDERAL CAMPAIGN**

SUBJECT: IRS FORM 990 REQUIREMENTS

Governance Body Information

Organizations applying to participate in the Combined Federal Campaign (CFC) at the local, national or international levels must submit either an IRS Form 990 that has been filed with the IRS or a pro forma version prepared for CFC application purposes only. The IRS Form 990 (long form) requires information on the governing body in Parts I and VII. This memorandum provides guidance on the CFC's review of IRS Form 990 submissions in relation to the eligibility requirements.

Part I, Line 3 of the form requires organizations to note the number of voting members of the governing body. This information specifies the number of independent voting members as of the end of the organization's tax year.

Part VII of the form requires organizations to identify all individuals who have served on the governing body during the course of the tax year. This includes individuals who may have left such positions prior to the end of the organization's tax year. Please note that the IRS Form 990 instructions define voting members of the governing body as a "director or trustee." Therefore, all individuals who were voting members of the governing body must be identified as such in Column C of Part VII.

The CFC will compare the number of voting members disclosed in Part I, Line 3 with the number of individuals that have the 'individual trustee or director' position selected in Part VII, Column C. If the number in Part I is more than the number in Part VII, the organization must

provide an explanation for the difference. Failure to clarify the difference or to timely file an amended IRS Form 990 with the IRS may result in the denial of the application.

All governing body information in the IRS Form 990 must be presented in either Part VII or Schedule J-2 of the form. The CFC will not accept information submitted in other statements or schedules.

Statement of Functional Expenses

Part IX of the IRS Form 990 contains four columns for each of the line items. This information must be complete and accurate in order to accurately calculate an organization's administrative and fundraising rate. The figure entered in Column A (Total Expenses) must equal the sum of the figures entered in Columns B (Program service expenses), C (Management and general expenses) and/or D (Fundraising expenses). Failure to categorize each expense in Columns B, C and D may result in the denial of the application.

For more information on the IRS Form 990, see CFC Memorandum 2009- 8 (www.opm.gov/cfc).