

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



CFC MEMORANDUM 2011-07

November 10, 2011

**TO: LOCAL FEDERAL COORDINATING COMMITTEES ,
PRINCIPAL COMBINED FUND ORGANIZATIONS, LOANED
EXECUTIVES, AGENCY COORDINATORS AND CFC KEY WORKERS**

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

SUBJECT: ETHICS AND THE COMBINED FEDERAL CAMPAIGN

As we embark on celebrating the 50th anniversary of the Combined Federal Campaign (CFC), we wanted to take the time to remind campaign workers of the importance of following U. S. Government ethics regulations in the performance of their work on the CFC.

The solicitation methods section of the CFC regulations (5 CFR §950.602) should be reviewed to ensure all campaign activities are in compliance with this section of the regulations. Of particular importance is the last sentence in 5 CFR §950.602(b) which states, "Any special CFC fundraising event and prize or gift should be approved in advance by the Agency's ethics official". In the past, some have taken the word "should" to mean there is an option. The word "should" in this sentence is used as a form of "shall" which means this is a requirement. Agency Coordinators and/or Key workers planning events within a Federal agency must receive the approval of the agency ethics official prior to holding the event. Local Federal Coordinating Committees (LFCC), Principal Combined Fund Organizations (PCFO) and/or Loaned Executives (LE) planning campaign-wide or multiple agency events must receive the approval of the agency ethics officials for all agencies involved.

While the CFC regulations permit these types of activities, each Federal agency has a different mission and culture. For example, in some cases, planned events may be utilizing services/materials from a private organization that would be considered a prohibited source for one agency and not another. Therefore, the individual agency ethics officer's decision regarding a special event is final.

We would also like to remind all LFCC members, LEs, Campaign Coordinators, Key Workers and any other Federal employees working on the campaign that you are all still Federal employees while working on the campaign. Therefore, you are still subject to Government Ethics rules and any additional ethics rules for your specific agency (e.g., Department of Defense provides guidance in various directives, etc.). One area that campaign workers should pay particular attention to is the ethics regulations related to receiving gifts. This would include items such as lunches, event tickets, and thank you gifts. Please ensure that all gifts are acceptable under Government Ethics regulations. Specific information regarding these regulations can be found at <http://www.usoge.gov/Topics/Gifts-and-Payments/Gifts---Payments/>. We also recommend you discuss this with your agency ethics officer.

On behalf of all who work hard to make this the largest workplace giving campaign in the world, I want to thank you for your time, effort and assistance in maintaining the integrity of the CFC. We look forward to 50 more years of caring. If you have any questions regarding this guidance, please contact your CFC Regional Representative (Curtis Rumbaugh for areas east of the Mississippi River; Mary Capule for areas west of the Mississippi River) at (202) 606-2564.