



CFC MEMORANDUM 2017-09

December 15, 2017

TO: CFC-PARTICIPATING FEDERATIONS AND CHARITABLE ORGANIZATIONS, LOCAL FEDERAL COORDINATING COMMITTEES (LFCCs), AND THE CENTRAL CAMPAIGN ADMINISTRATOR (CCA)

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SUBJECT: CFC APPLICATION STANDARDS: DE MINIMIS SERVICES

The implementation of a single site for submission and review of CFC applications has uncovered a number of issues which negatively impact the quality and consistency of applications submitted for participation in the Combined Federal Campaign (CFC) and in the standards applied by application reviewers. This CFC Memorandum is one in a series meant to fine-tune CFC application standards and the criteria by which these applications are reviewed.

Background

CFC regulations at 5 CFR §950.202(a)(1)(viii) state:

De minimis services, benefits, assistance, or other program activities in any state or foreign country will not be accepted as a basis for qualification as a national or international organization. Factors that OPM will consider in determining whether an organization's services, benefits, assistance or other program activities are de minimis include, but are not limited to: nature and extent of the service, benefit, assistance or activity; frequency, continuity, and duration; value of financial assistance awarded to individuals or entities; impact on, or benefit to, beneficiaries; and number of beneficiaries.

Moreover, CFC regulations at 5 CFR §950.202(a)(1) state the national or international applicant must certify that it “provides or conducts real services, benefits, assistance, or program activities ... in 15 or more different states or one or more foreign countries over the 3 calendar year period immediately preceding January 1 of the campaign application year.”

While national and international applicants are allowed a three year period during which to demonstrate provision of services to 15 states and/or one foreign country, local organizations must demonstrate provision of services to the local CFC zone to which they apply during the one calendar year immediately prior to the application year.

This memo is meant to clarify the determination of *de minimis* services across different time periods and service areas.

Determination

Pursuant to 5 CFR §950.202(a)(1)(viii), the services of national and international organizations shall not be cumulative over the span of three years.

Real services are non-*de minimis*; and, since a local organization is expected to provide real, non-*de minimis* services in the single calendar year immediately preceding the campaign application year, national and international applicants, too, should be expected to provide real, non-*de minimis* services to 15 states and/or one foreign country in at least one of the three calendar years immediately preceding the campaign.

Therefore, the *de minimis* services provided over the course of three years shall not be determined to be non-*de minimis* when combined. National and international applicants are permitted to look back as far as three years to identify non-*de minimis* services provided in any one (or more) of those three years for each of 15 states and/or one foreign country; however, three years of *de minimis* services in a state or foreign country cannot be combined to be determined real, non-*de minimis* services.

These requirements are effective for the 2018 campaign. If you have any questions, please contact the Office of CFC at cfc@opm.gov.