



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT  
Washington, DC 20415

Merit System  
Accountability  
and Compliance

CFC MEMORANDUM 2018-08

September 12, 2018

**TO: LOCAL FEDERAL COORDINATING COMMITTEES AND  
OUTREACH COORDINATORS**

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

**SUBJECT: GUIDANCE ON DONOR ACKNOWLEDGEMENT**

The OPM Office of the CFC is aware of recent issues and errors surrounding the process for sending 2017 donor acknowledgments. Although well-intended, some of what we have observed do not follow the regulations letter and the spirit of the following section of the regulations [5 CFR §950.501(c)].

**§950.501 Release of contributor information.**

(c) It is the responsibility of the CCA to forward the contributor information for those who have indicated that they wish this information to be released to the recipient organization directly, if the organization is independent, and to the organization's federation if the organization is a member of a federation. The contributor information must be forwarded as soon as practicable after the completion of the campaign, but in no case later than a date to be determined by OPM. The date will be part of the annual timetable issued by the Director under §950.601(b). **The federation is responsible for ensuring the information is released to the appropriate member organization. The CCA may not sell or make any other use of this information. Federations may not retain donor information for their own use unless the donor made a direct designation to the federation itself. This policy also prohibits the sharing of donor information, even free of charge. [Emphasis added.]**

We recognize the desire on the part of some federations to assist their members in processing donor acknowledgments. However, if the donor has not affirmatively “opted-in” by also releasing her or his name and contact information to the federation, providing such a member service is inconsistent with CFC regulations. Practices which violate this regulation include:

- Federations are providing acknowledgments to donors of their member charities from the Federation e-mail domain.

- Federation CEOs “virtually” signing e-mail “Thank You” notices to donors who gave to a member charity but not to the federation itself.
- Errors in matching the donor name, designated charity and amount of the gift.

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The listing above is not intended to be a comprehensive list of unacceptable practices, but only to provide examples. Any time the recipient charity is not sending the thank you letters directly to the donor, we advise the federation to obtain advanced approval from OPM about the content, layout, brand identity and other aspects of any acknowledgement campaign.

### Providing any service to member charities must be consistent with CFC regulations.

Federations must ensure that all member services remain “brand neutral” and donor communications are sent under the banner of the member charity. E-mails must be signed by a representative of the member charity such as a volunteer or staff leader, and not the federation leadership, and include the members brand identity. Acceptable means to present and accomplish effective donor acknowledgment include, but are not limited to:

- Providing the charity with an e-mail address at the federation,
- Designing a “Thank You” note directly from the charity, or
- Distributing a fixed PDF file with the charity’s brand displayed, (and not the federation’s).

The listing above is not intended to be a comprehensive list of approved practices, but only to serve as examples. If you would like OPM to review a planned communication service to member charities, please contact us via [cfc@opm.gov](mailto:cfc@opm.gov) in advance of the distribution.