



CFC MEMORANDUM 2018-11

December 19, 2018

**TO:** LOCAL FEDERAL COORDINATING COMMITTEES (LFCCs),  
OUTREACH COORDINATORS (OCs), AND THE CENTRAL  
CAMPAIGN ADMINISTRATOR (CCA)

**FROM:** KEITH WILLINGHAM *Keith Willingham*  
DIRECTOR, OFFICE OF THE COMBINED FEDERAL  
CAMPAIGN

**SUBJECT:** CFC ACTIVITIES DURING A LAPSE OF APPROPRIATIONS

The following guidance is provided to local Combined Federal Campaign (CFC) personnel and Federal agencies in the event of a lapse of appropriations that results in a partial shutdown of the Federal government *at any point during the fiscal year 2019 (Oct. 1, 2018 – Sep. 30, 2019)*. A signed continuing resolution from the President removes the restrictions noted in each of the cases below.

#### **GUIDANCE FOR FEDERAL EMPLOYEES**

*Local Federal Coordinating Committees (LFCC)* – LFCCs will not conduct CFC business during a lapse of appropriations for the U.S. Office of Personnel Management (OPM). This restriction includes CFC meetings, the review of campaign expenditures and invoices related to preparation for events to be held once appropriations are restored. LFCC members who are not furloughed are similarly prohibited from doing the work of the LFCC. This restriction is removed when a continuing resolution or full appropriations for OPM have been passed by the United States Congress, **and** a quorum of the LFCC (as documented in the LFCC governance document) can be convened (i.e., a quorum of members are from funded Federal agencies).

*Loaned Executives (LE)* – LEs are recalled to their home agencies during a lapse of appropriations at their home Federal department or agency. These individuals cannot work on CFC activities or engage in campaign communications until appropriations are restored at their employing department or agency. LEs that perform exempt functions at their home agencies will remain at their agencies to support those functions during the shutdown.

*CFC Events* – Activities, such as solicitations, training, and special events that are conducted by a Federal agency not impacted by the shutdown may continue at the discretion of the agency head. However, any events that require the administrative support of the OC must be reviewed

and approved by the LFCC *in advance of the shutdown*. Events that do not have such approval must be postponed until full operations at the Office of the CFC resume.

Owing to the pressing need to have payroll offices process all 2019 CFC pledges, under no circumstances will the 2019 CFC solicitation period be extended beyond its current date of January 11, 2019.

## **GUIDANCE FOR CFC CONTRACTORS AND OTHER PARTNERS**

*Central Campaign Administrator (CCA)* – The CCA will continue with its CFC-related activities except that it will suspend communications with Federal agencies, LFCCs, and other federal CFC personnel, regardless of the status of the agencies and/or personnel (i.e., excepted, exempt, furloughed, or otherwise) with whom the CCA personnel seeks to communicate.

*Outreach Coordinators (OCs)* – OCs will completely suspend all CFC-related activities related to employee engagement, event planning, marketing, and material distribution except that events with agency head and LFCC approval (under the *CFC Events* section above) may commence. Costs associated with such events will require appropriate documentation to accompany invoices. OCs, upon prior approval, may continue to conduct charity outreach for the 2019 campaign (if those activities have commenced).

## **GUIDANCE FOR CFC APPLICANT ORGANIZATIONS**

The CFC Application System will continue to accept applications through January 31, 2019. While the CCA will continue to provide technical support as required by applicant organizations, OPM will not be able to address matters of policy or offer regulatory guidance during the lapse in appropriations. All organizations should not assume an extension of the application will be granted. All matters arising as a direct result of a lapse in appropriations for OPM will be considered on a case-by-case basis when and if OPM is funded. All CFC stakeholders should note that this has the potential to cause significant delays in the 2019 CFC timeline and plan accordingly.

Until and unless OPM is funded, there is no oversight and guidance to the program. Although some agencies might be funded, work requiring OPM oversight must be suspended until we are authorized to continue operations.

In the event of a lapse in appropriations, Marcus Glasgow will be staffing the Office of the CFC to coordinate contractors. If you have any questions, please contact us at [cfc@opm.gov](mailto:cfc@opm.gov) or 202-606-2564.