

## ETHICS CLEARANCES FOR FUNDRAISING EVENTS FOR THE COMBINED FEDERAL CAMPAIGN



**General Standards.** The purpose of the Combined Federal Campaign (CFC) is to provide a convenient means for Federal employees to donate to charities. In keeping with applicable regulations and policies, organizers of fundraising events must adhere to the following standards.

- Participation by a Federal employee must be strictly voluntary and non-coercive.
- An employee cannot be charged money for participation in CFC events. For all raffle tickets, sales of any kind, or food, a donation amount may be suggested.
- With any fundraising activity, the employee must be allowed to specify which charity his or her donation is to be directed to, or be informed that the donation will become part of an undesignated fund.
- Individual charities cannot be advertised or highlighted at CFC events.
- Although some support from outside sources is permitted, this should be minimal and consistent with the guidelines set forth below.
- No events should be planned that are likely to be controversial or would cast a negative light on the Department or the purpose or spirit of the CFC.

**Approval for CFC Fundraising Events and Activities.** Events and activities to seek contributions to the CFC must be approved in advance by an Ethics official (except for payroll deductions). Some types of CFC events and activities have already been pre-approved and do not require further clearance by an Ethics official. Any event or activity not listed below as being pre-approved requires approval from an Ethics official.

**Pre-Approved Events.** The following events are pre-approved and do not require any further clearance from an Ethics official.

- Kick-off Events and Rallies – These events are permitted if there is no fundraising and if no appropriated funds are used for such events.
- Sale or Auction of Goods – These events, including bake sales and book sales, where items are being sold or auctioned to Federal employees or other workers sharing the same premises, such as contractors, do not require prior Ethics approval if:
  - (1) the items for sale or auction are donated by Federal employees (not including personal

services provided by the employee) and  
(2) the items for sale or auction are valued at \$50 or less.

- Games of Chance – These events, including lotteries, raffles, and door prizes, do not require prior Ethics approval if:
  - (1) the prizes are donated by Federal employees,
  - (2) the prizes are valued at \$50 or less (or consist of a lunch with a Government official or an agency parking space not to exceed one month), and
  - (3) only Federal employees (or contractor employees who work on Federal premises) are eligible to win.

**Events and Activities that Require Prior Approval.** All other events and activities require prior approval from an Ethics official. When planning your event, please keep the following points in mind.

- Use of Appropriated Funds – In some instances, appropriated funds may be used to further the purposes of the CFC. If you intend to use appropriated funds for any event or activity, you must first contact the Department's Office of the General Counsel (or USPTO's General Counsel's Office for USPTO CFC events) for advice on whether such funds may be used.
- Solicitation of Donations for Use as Prizes from Outside Organizations – You must obtain clearance from an Ethics official prior to soliciting support from outside organizations if the item or service is valued at more than \$20.

Please note that you cannot solicit items or services valued at more than \$100 for use in CFC fundraising activities. You can only solicit donations from outside organizations that do not have any matters before your agency and that your agency does not regulate.

Donations from CFC Charities – Charities that are supported by the CFC may donate items for use in CFC fundraising, but the charity cannot be acknowledged as a sponsor or donor at any CFC event or fundraiser.

**For advice on the rules regarding CFC events or clearance for a CFC fundraising event, contact the Ethics Law and Programs Division at [ethicsdivision@doc.gov](mailto:ethicsdivision@doc.gov) or 202-482-5384.**

*Prepared by the Ethics Law and Programs Division, Office of the General Counsel, United States Department of Commerce – 202-482-5384 – [ethicsdivision@doc.gov](mailto:ethicsdivision@doc.gov) – January 4, 2016*