

Attachment to CFC Memorandum 2006-21

Suggestions for *ATTACHMENT A*

This document supercedes and revokes prior **Suggestions for Attachment A** set forth in CFC Memorandum 2003-9.

Required Schedule of Services or Benefits.

Applicants must include as ***Attachment A*** a schedule listing a detailed description of the real services, benefits, assistance, or program activities provided or conducted in each state (minimum 15) or foreign country (minimum 1), including the year of service. (References in this guidance to “services or benefits” are intended to mean real services, benefits, assistance, or program activities as set forth at 5 CFR § 950.202.)

The Office of Personnel Management (OPM) does not require CFC applicants to use a standardized format for the schedule of services or benefits, but *will not accept publications or other documents in lieu of a schedule detailing this information.*

OPM will evaluate each applicant’s schedule of activities on a case-by-case basis, and will consider a variety of factors, including but not limited to those set forth below. The factors set forth are not intended to be exhaustive, and organizations are encouraged to demonstrate their provision of services in any manner that is appropriate and that will allow OPM to accurately determine that real services, benefits, assistance, or program activities were provided or conducted in particular states or countries on particular dates.

OPM recommends the schedule of each organization include the elements listed below under the heading “DO.” Applicants should avoid describing services or benefits in the manner listed below under the heading “DON’T,” as these common pitfalls make it more difficult for OPM to determine that services or benefits have been provided in a state or country in a given year.

DO

- **WHO.** Specify the recipient(s) of the services or benefits. Indicate the number and type of individuals or organizations that received the services or benefits. In cases where recipients are difficult to quantify, describe the target population.
- **WHAT.** Describe the services or benefits provided or conducted with detail and specificity. Include the quantity, value, scope, and impact of the services or benefits.
- **WHERE.** Indicate the city and state, or specific location(s) within the foreign country(ies) where services or benefits were provided. For scholarships and grants, the location of the service or benefit is the beneficiary’s residence. For memorials, museums,

and public recreation facilities, the location of the service or benefit is the location of the facility or its programs or activities.

- **WHEN.** Provide the dates on which the services or benefits were provided or conducted within the 3 year period immediately prior to the application year. For example, the dates of service set forth for participation in the 2007 CFC must fall within the time period January 1, 2004 through December 31, 2006. Events that continue or recur should include year and frequency with which they were provided or conducted (e.g. Service X monthly from June 2005 – May 2006 and bimonthly from May 2006 to December 2006. Service Y daily from June 2003 to present.)

DON'T

- Generalize the nature of the activity. Generalized statements regarding the nature of the activity, standardized formats, repetitive text, and checklists can prevent OPM from determining what specific real services or benefits the applicant provided, and they detract from the credibility of the application.
- List services or benefits that were “offered.” Services and benefits are not considered provided or conducted unless they were received by the intended recipients or otherwise have an articulated impact.
- List services or benefits provided by affiliates. OPM must be able to determine from the application that services or benefits were provided by the applicant organization.
- List services or benefits provided by the recipient of the applicant’s services or benefits. For example, if organization A has provided a monetary grant to organization B, OPM will not accept services and benefits provided by organization B as a demonstration of organization A’s services or benefits.
- Claim dissemination of information and/or publications via the U.S. Postal Service, the internet, or a combination thereof as the only source of services or benefits.
- Claim services or benefits that consist of mere distribution of standardized or mass-produced information to a passive audience, such as distribution of brochures, websites, or other publications when that is the only service or benefit.
- Claim fundraising activity as a service or benefit.
- Indicate that an activity was provided in “numerous states.” OPM must be able to determine what specific services or benefits were provided in each particular state.
- List the states or countries in which organization members, board members, affiliated groups, or conference attendees are located as a substitute for the state or country in which the services or benefits were provided. However, for scholarships and grants, **DO** list the state or country of the beneficiary’s residence.

- List the states of residence of visitors to a memorial, museum or public recreation facility.
- Indicate the date of services as generally having been provided during the three year period immediately preceding the application year. Statements such as “since inception,” “ongoing,” “2003 to present,” or “2004-2006,” that do not indicate the frequency with which the particular service or benefit was provided do not sufficiently specify when the activity occurred.

De Minimis

CFC regulations (71 Fed. Reg. 67276 (November 20, 2006)) have been clarified to explain why “**de minimis**” services or benefits in any state or foreign country will not be accepted as a basis for qualification as a national or international organization.

OPM, in its sole discretion, will determine whether services or benefits are “de minimis” based on whether the services, under the facts and circumstances presented, fail to constitute more than a minimal level, type or amount.

Factors that OPM will consider in determining whether an organization’s services, benefits, assistance or 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;
- impact on, or benefit to, beneficiaries;
- number of beneficiaries.

Examples of Qualifying Services or Benefits in Attachment A.

NOTE: There are many ways to present the information necessary to meet this eligibility requirement. Following is a sample format with hypothetical information from various types of organizations that provides the required details.

Location	Date(s) of Service	Description of Service, Benefit, Assistance, or Program Activity
San Diego, CA	June 1-3, 2004	ABC Charity conducted a national conference on cancer research and treatment. ABC Charity staff made presentations on new research, provided advocacy training to attendees, and facilitated a discussion between policymakers and medical researchers. 120 ABC Charity members from the healthcare industry attended the three-day conference

Florida	Calendar Year 2005 – scholarships awarded monthly	<p>Charity International awarded scholarships to the following Florida high school students pursuing a degree in computer technology to attend the college or university of their choice:</p> <ul style="list-style-type: none"> • A. Smith, Pensacola (\$1,800) • J. Doe, Ft. Lauderdale (\$5,000) • B. Callahan, Jacksonville (\$1,200) • D. Johnson, Tampa (\$800) • C. Jones, Ft. Myers (\$900)
Erie, PA	July 9, 2005	<p>ABC Environmental Trust trained volunteers on the conservation of Erie County beaches. The two-hour training included presentations from the Department of Public Health, the Erie Community Fund, and the ABC Environmental Trust Executive Director, as well as the distribution of garbage bags, plastic gloves, and orange vests. Volunteers were assigned to one of ten locations where they reported to a coordinator and were given further instructions. The one-day conservation effort resulted in the collection of 250 pounds of garbage. 23 volunteers were trained and 10 miles of beaches were cleaned.</p>
Austin, TX	June 3, 2004	<p>The LMNOP Society held its annual advocacy day. LMNOP Society staff provided attendees with talking points on the benefits of funding for additional medical research and ways to educate legislators about the importance of addressing this issue. Participants were also given handbooks and directions to their state legislators' offices. 95 volunteers attended, visiting 42 state legislator offices. As a result of the visits, 18 members of the State house became cosponsors of the LMNOP funding bill.</p>
New Delhi, India	Calendar Year 2006 – Equipment shipped in May and October	<p>The XYZ Foundation provided the following to the India Children's Hospital, which serves over 4,000 patients annually:</p> <ul style="list-style-type: none"> • In-kind contributions: eight new computers, ten defibrillators, and an X-Ray machine. • Two XYZ Foundation physicians traveled to India in May to train 24 medical personnel at the Hospital on new insulin therapies. • Awarded a grant of \$25,000 to help defray the costs of medical treatment for uninsured children.

Examples of Non-Qualifying Services or Benefits in Attachment A.

Location	Date(s) of Service	Description of Service, Benefit, Assistance, or Program Activity
Portland, ME	August 10, 2005	<p>XYZ Institute conducted a fundraiser at the Portland Independence Day celebration that raised \$22,000. 250 individuals contributed.</p> <p><i>This example only describes a fundraising activity/event and does not identify an eligible real service, benefit, assistance, or program activity.</i></p>
Seattle, WA	2006	<p>The Charity Museum, based in Philadelphia, recorded 300 visitors from the Seattle area in 2006.</p> <p><i>In this example, the museum provided a service in Pennsylvania, where the facility is located. The fact that visitors to the Pennsylvania museum came from Washington does not mean that the museum's services were provided in Washington.</i></p>
All 50 States	January 2005	<p>The XYZ Medical Foundation awarded a research grant to Dr. John Smith of Iowa State University. Dr. Smith's research on pain management includes a research group of 40 patients and impacts thousands of Americans with chronic pain from all 50 states.</p> <p><i>The applicant cannot claim the services provided by the recipient of its funding as meeting the 15 state criteria. In this case, the applicant has provided service only in Iowa.</i></p>
Denver, CO	November 2006	<p>ABC Charity's Colorado chapter held a workshop for local families interested in learning more about ABC's research programs. Presentations were made by ABC Colorado's Executive Director and the Vice President of Research.</p> <p><i>This description shows only the activities of a local chapter or affiliate. In this case, the national applicant needs to show how it provides financial support, technical advice, or other services to the local chapter.</i></p>
Dallas, TX	December 2004	<p>Charity Central held a Family Day attended by local physicians.</p> <p><i>The nature of the activity is not clear. This example does not specify what the real service, benefit, assistance, or program activity was.</i></p>

Florida	2004-2006 <i>This example does not specify when the activity(ies) actually occurred.</i>	Charity International awarded scholarships to the following Florida high school students pursuing a degree in computer technology to attend the college or university of their choice: <ul style="list-style-type: none"> • A. Smith, Pensacola (\$1,800) • J. Doe, Ft. Lauderdale (\$5,000) • B. Callahan, Jacksonville (\$1,200) • D. Johnson, Tampa (\$800) • C. Jones, Ft. Myers (\$900)
Paris, France	July 22-24, 2005	Charity International held a membership conference in Paris. Presentations were made by CI staff, U.S. and French government officials, and recipients of CI funding. 214 individuals attended. <i>One international conference, alone, in a three-year period may be considered a de minimis activity.</i>

Following is an example of the use of repetitive text that will not be accepted. This format does not provide sufficient information to allow OPM to determine the specific activity that was provided by the applicant during the asserted timeframe.

Alaska	2006	ABC Charity provides newsletters, mentoring program, recreational activities, and counseling to at-risk youth. We have two youth camps in Alaska.	60 Young Adults benefitted
California	2006	ABC Charity provides newsletters, mentoring program, recreational activities, and counseling to at-risk youth. We have ten youth camps in California.	130 Young Adults benefitted
Colorado	2006	ABC Charity provides newsletters, mentoring program, recreational activities, and counseling to at-risk youth. We have four youth camps in Colorado.	90 Young Adults benefitted