BY THE COMPTROLLER GENERAL

Report To The Chairman Committee On Government Operations House Of Representatives

OF THE UNITED STATES

Fiscal Management Of The Combined Federal Campaign

The Combined Federal Campaign, the government's annual charity drive, raises millions of dollars in employee contributions. The Office of Personnel Management has overall responsibility for managing the charity drive. In 1984, over 500 separate local campaigns served different geographic areas where federal personnel live and work.

GAO reviewed the fiscal management of campaign contributions in 20 locations throughout the country that accounted for 38 percent of all CFC contributions received in 1984 and found that

- --at least 97.6 percent of all contributions at 16 of the campaigns were recorded and distributed in accordance with OPM regulations (4 campaigns were not included in this analysis);
- --in the absence of an OPM regulation requiring them to do so, 7 campaigns did not contact donors for clarifying instructions on improperly completed pledge cards, which resulted in thousands of donations being distributed to the wrong charities; and
- --3 campaigns made no effort to reduce their net fund-raising costs by depositing idle campaign funds in interest-bearing bank accounts.

GAO recommends actions that the Office of Personnel Management should take to strengthen campaign follow-up procedures regarding improperly completed pledge cards and to earn interest on idle campaign funds.





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COMPTROLLER GENERAL OF THE UNITED STATES WASHINGTON D.C. 20648

B-202792

The Honorable Jack Brooks Chairman, Committee on Government Operations House of Representatives

Dear Mr. Chairman:

This is the second report issued in response to your request that we review the Office of Personnel Management's (OPM) administration of the Combined Federal Campaign (CFC)—the federal government's annual charity drive. As agreed with your office, this report addresses the campaign's fiscal controls.

Our review of random samples of pledge cards received by 16 local campaigns in 1984 disclosed that at least 97.6 percent of all contributions in each campaign were recorded and distributed in accordance with OPM regulations. However, when federal personnel wanted to designate their contributions but did not complete their pledge cards properly (such as not providing all required signatures to authorize the designations), the managing charity in 7 of the 20 local campaigns in our study did not contact the contributors for clarifying information. In the absence of an OPM regulation regarding the correct handling of improperly completed pledge cards, such contributions in the seven campaigns were retained for distribution by the charity managing the campaigns (United Way) rather than being forwarded to the charities that had actually been designated by the contributors. According to the managing charities, three of these campaigns changed their follow-up procedures in 1985 while four continued to treat improperly prepared pledge cards as designations to themselves.

On a different matter, local campaign officials told us that fund-raising costs charged to the CFC have increased in recent years. Cited most frequently as the reasons for increases were (1) the charities that manage each local campaign have begun to charge for indirect services they previously had provided without charge; (2) administrative responsibilities of

The first report, Federal Personnel Should Be Better Informed of How Undesignated Contributions to the Combined Federal Campaign Will Be Distributed (GAO/GGD-84-84), was issued on June 27, 1984.

managing charities have increased because of changes in OPM's regulations; and (3) general inflation. Some of the increase in fund-raising costs could have been offset in three of the campaigns studied if idle campaign funds had been placed in interest-bearing accounts.

BACKGROUND

Under Executive Order No. 12404 (February 10, 1983), OPM has overall management responsibility for the CFC. OPM issues regulations to be followed by all federal agencies and participating charitable organizations in (1) conducting annual solicitation drives among federal personnel; (2) collecting pledged gifts from federal personnel; (3) accounting for, reporting, and remitting to central receiving points contributions withheld from federal employees' paychecks through the payroll deduction plan; and (4) conducting annual audits of the charitable campaigns.

At the headquarters level, OPM's Assistant to the Deputy Director for Regional Operations is responsible for, among other things, oversight of the CFC. He has assigned one of his staff members, a program analysis officer, to prepare program guidance, resolve operational problems, and summarize and analyze campaign results. The Regional Operations office does not, however, review individual campaigns periodically to assure that they are run according to OPM regulations, although problems brought to its attention are examined.

In the 1984 CFC, 536 separate local campaigns served different geographic areas where federal personnel live and work, including locations in the 50 states, the District of Columbia, Puerto Rico, and the Virgin Islands. Federal civilian and military personnel can choose to designate all or part of their contributions to one or more specific charities, or they can leave their contributions undesignated. OPM's regulations define undesignated funds as "deemed designated" to the managing charity. For the 1984 CFC, OPM reported that \$109.3 million was pledged by 2.3 million contributors in these campaigns (\$73.1 million designated to specific charities and \$36.2 million undesignated).

Although federal personnel normally complete their pledge cards in the fall of each year, contributions made through payroll deductions do not begin until January of the following year and continue through December. When the term "campaign year" is used in this report, it refers to the calendar year in which the

²A separate campaign serves all federal personnel in overseas locations. The 1984 overseas campaign raised about \$9.7 million.

payroll deductions were made (January through December), not the year in which the pledge cards were completed.

Until 1982, OPM was responsible for deciding how undesignated contributions would be distributed. However, in 1982, OPM began allowing Federal Coordinating Committees—federal officials who oversee the campaigns in each locality—to select one of the participating charities to manage the local campaign and serve as the campaign's fiscal agent. The managing charity is called the Principal Combined Fund Organization (PCFO), and it is authorized to distribute undesignated funds without review or approval by local federal officials or OPM. In applying the criteria set forth by OPM for selecting a PCFO, one charity (United Way) was selected as PCFO in 90.5 percent of all local campaigns in 1983 (the last year for which such data are available).

OBJECTIVES, SCOPE, AND METHODOLOGY

As requested, our objectives were to (1) determine if the donations of federal personnel were accurately recorded and paid to the appropriate charities, (2) determine if PCFOs' fundraising costs had increased in recent years, and (3) obtain information on what types of services were donated to local campaigns.

We conducted our review at OPM headquarters and at 20 local campaigns from July 1984 to May 1985. These 20 campaigns accounted for 33 percent of the contributors and 38 percent of the total dollar contributions pledged during the 1984 CFC. (See app. I for an identification of these campaigns.) As agreed with your office, the 20 campaigns were generally selected from campaigns which received substantial numbers of pledges in the 1984 CFC. The 1984 campaign was reviewed because it was the most recently completed campaign.

We were unable to trace pledge cards to accounting records for four campaigns because the donors' names and social security numbers (or something else to identify individual pledge cards) were not shown in the campaigns' accounting records. At the remaining 16 campaigns we determined if the PCFOs (all United Way) accurately recorded and paid funds designated on the pledge cards to the appropriate charities. This was done by comparing the designations on random samples of pledge cards at each of the 16 campaigns with the designations that the PCFOs recorded in their accounting systems used to make payments to charities. These 16 campaigns accounted for pledges totaling \$38 million (or 35 percent) of the total contributions pledged in all campaigns during the 1984 CFC and 30 percent of all federal personnel contributing for the year.

The samples of pledge cards we reviewed at each of the 16 campaigns were of sufficient size to enable us to project our findings to all pledge cards in each campaign. We projected a confidence interval using a 95 percent confidence level for each campaign. However, since the campaigns were not selected randomly, the findings in the 16 campaigns cannot be projected to all 536 local campaigns nationwide. Our procedures for sampling pledge cards as well as additional details regarding our scope and methodology are discussed further in appendix II. In our calculation of PCFO errors (discussed below) we did not count as an error any pledge cards that were not correctly completed by the contributors.

We discussed our findings with OPM officials responsible for managing the CFC and included their comments where appropriate. However, as agreed with your office, we did not solicit OPM officials' views on our conclusions and recommendations, nor did we request official comments on this report. Except as noted above, our review was carried out in accordance with generally accepted government auditing standards.

PCFOS MADE RELATIVELY FEW ERRORS IN RECORDING AND DISTRIBUTING DONATIONS

OPM regulations give PCFOs the responsibility for insuring that donations are distributed as directed by the contributors. Specifically, these responsibilities include (1) tabulating information from contributor pledge cards to insure an accurate accounting of pledges directed to individual charities, as well as undesignated pledges; (2) collecting contributions derived from one time cash gifts and periodic payroll deductions; and (3) making payments to participating charities and national federations of charities. (See page 5 of app. III for a description of these federations.) In most cases, the PCFO serves as the campaign's fiscal agent. However, it may arrange for a financial institution to provide such services on its behalf.

We found that each of the 16 PCFOs recorded and paid donations as required by OPM regulations on at least 97.6 percent of the pledge cards. The instances where pledge cards were not processed properly in these 16 campaigns occurred primarily because the PCFOs did not accurately record (keypunch) designations on the pledge cards into their accounting systems. As a result of these errors, the PCFO paid the designated money

³Pledge cards from Postal Service employees were not included in the samples (See app. II, p. 2).

to the wrong charity, and/or the amount actually paid to the properly designated charity was incorrect. The estimated number of pledge cards processed as required in each campaign and the estimated confidence intervals are shown on page 6. Our sampling methodology did not permit us to project the amount of erroneous payments.

PROJECTION OF PLEDGE CARDS PROCESSED IN 1984

IN ACCORDANCE WITH OPM REGULATIONS

Campaign ^a	Universe estimate of pledge cards pro- cessed as required ^b (95 percent confidence level)	Confidence intervals for percent of pledge cards processed as required (95 percent confidence level)
Little Rock, AK	7,624	98.9 to 100.0%
San Diego, CA	91,134	99.0 to 100.0
Denver, CO	16,442	98.3 to 99.9
El Paso Co., CO	17,721	99.7 to 100.0
Washington, D.C.	231,385	97.8 to 99.6
Honolulu, HI	50,203	97.6 to 99.8
New Orleans, LA	6,047	99.0 to 100.0
Detroit, MI	7,506	98.8 to 100.0
St. Louis, MO	11,195	99.7 to 100.0
Ft. Monmouth, NJ	4,761	98.6 to 99.9
Albuquerque, NM	7,634	99.3 to 100.0
Long Island, NY	4,088	99.2 to 100.0
Cleveland, OH	5,373	99.8 to 100.0
San Antonio, TX	63,334	99.8 to 100.0
Norfolk, VA	84,924	97.6 to 99.2
Richmond, VA	3,978	98.1°

^aWe could not review the PCFOs processing of pledge cards in four campaigns: Lansing, MI; New York, NY; Chicago, IL; and St. Paul-Minneapolis, MN. (See p. 3.)

bThese calculations exclude pledge cards from Postal Service employees. See appendix II for a description of our projection methodology.

^CNo confidence interval is applicable here since all non-Postal Service pledge cards in the universe were examined.

PCFOs used a variety of procedures to assure pledge cards were recorded and paid accurately. For example, in the San Diego campaign, the PCFO reviewed each pledge card for legibility and completeness before putting the information into its accounting system. In the Detroit campaign, the PCFO recorded the information from each pledge card twice to provide an independent check of the entries into its accounting system. A complete description of the CFC fiscal process is included in appendix III.

SOME PCFOS' FOLLOW-UP PROCEDURES ON IMPROPERLY COMPLETED PLEDGE CARDS NEED IMPROVEMENT

In making a contribution to a designated charity, individual donors must rely on the PCFO to ensure that their designations are paid to the correct charity. However, OPM's regulations for the 1984 CFC did not specify how PCFOs were to handle improperly completed pledge cards. As a result, each PCFO could unilaterally decide whether to treat designated contributions on such cards as undesignated gifts, thereby retaining the money to distribute themselves, or contact the contributors to clarify the designation instructions. We found major differences in how PCFOs processed these contributions.

The absence of an OPM regulation on how to handle improperly completed pledge cards is particularly significant since PCFOs have the unchecked authority to decide how to distribute undesignated contributions to any charity, including themselves. As discussed in our earlier report, this authority creates the appearance of, if not an actual, conflict of interest for the PCFOs.

PCFOs processed improperly completed pledge cards differently in 1984

Our review of 20 PCFOs found that 13 had a policy of obtaining clarifying instructions from contributors who submitted improperly completed pledge cards with designations during the 1984 campaign. The seven remaining PCFOs⁴ treated such contributions as undesignated gifts to the PCFO, which is not prohibited by OPM regulations. However, two of these seven campaigns—Norfolk and St. Louis—used pledge cards that did not comply with OPM's prescribed format. Defects in the card formats in these campaigns caused many improperly completed cards to be submitted. The following sections provide a summary of the 1984 Norfolk and St. Louis campaigns.

⁴Denver, Colorado; El Paso County, Colorado; Washington, D.C.; Honolulu, Hawaii; Cleveland, Ohio; Norfolk, Virginia; and St. Louis, Missouri.

The Norfolk, Va., campaign

The Norfolk pledge card required federal personnel who wanted to designate their contributions to specific charities to sign their names twice rather than once as prescribed by OPM. (A third signature was required on the Norfolk pledge card to authorize payroll deductions.) The Norfolk CFC literature stated that designations on pledge cards without the additional signature (inserted immediately after the last designation on the pledge card) would not be honored and that all such designated contributions would be treated as undesignated gifts. Nevertheless, many contributors apparently did not understand these instructions. On the basis of our review of a random sample of pledge cards, we estimated that from 17,201 to 29,271 non-Postal Service pledge cards in the Norfolk campaign were not correctly completed.

A PCFO official stated the PCFO did not attempt to seek clarification of designations on incomplete pledge cards. We estimated that, of a total of about \$3.9 million received in the 1984 Norfolk campaign, the incomplete cards contained designations totaling between \$852,806 and \$1,496,814. See appendix IV for additional details on the specific charities that did not receive their designated contributions as a result of the PCFO's handling of incomplete pledge cards.

PCFO officials stated that they changed their policy for the 1985 campaign and began honoring designations on all pledge cards regardless of whether all required signatures were present.

The St. Louis, Mo., campaign

In the St. Louis campaign, the space on the pledge card where contributors were supposed to indicate the amount of their total annual gift they wanted to be paid to a particular charity did not specify "annual amount" as prescribed by OPM. Rather, the space was simply labeled "amount." In addition, the CFC literature and pledge card did not explain how to complete the space labeled "amount." After we brought this problem to the St. Louis PCFO officials' attention, they told us they reviewed 38 percent of all 16,321 pledge cards with designations in the 1984 campaign and found that 8.7 percent of the cards contained the biweekly payroll deduction amount, rather than the annual amount.

A St. Louis PCFO official acknowledged that the pledge card was confusing, but blamed federal personnel who collected the pledge cards for failing to ensure that the cards were filled out correctly. The official said the PCFO did not contact these contributors to clarify the designations; instead, the PCFO paid the biweekly amounts on these cards to the designated charities

and treated the remaining funds as undesignated gifts to the PCFO for distribution. For example, if the pledge card was for a \$260 annual gift (\$10 for each of 26 pay periods), the PCFO paid \$10 to the designated charity and gave \$250 to itself for distribution. (See our earlier report for a discussion of the procedures followed in distributing undesignated contributions.)

During the 1984 St. Louis campaign, pledges totaling about \$1.4 million were received, of which \$861,000 was designated. A PCFO official estimated that improperly completed pledge cards contained designations amounting to \$91,000 that probably should have gone into designated funds. (See app. IV for additional details).

A PCFO official stated that the PCFO adopted the OPM prescribed pledge card format for the 1985 campaign but continued its policy of not contacting contributors for clarification on improperly completed pledge cards.

Other campaigns also use different card formats

In addition to Norfolk and St. Louis, the Albuquerque and Little Rock campaigns did not use pledge cards that followed the format prescribed by OPM. However, both these campaigns had a policy of contacting contributors for clarification when pledge cards were improperly completed. Because of our findings in the Norfolk and St. Louis campaigns, we examined the pledge cards used by 396 local campaigns in 1984 that were on file at OPM. (Pledge cards for the other 140 campaigns in the 1984 CFC were not in OPM's files.) We identified 45 other campaigns with pledge cards containing defects similar to the Norfolk and St. Louis pledge cards. An earlier OPM review of pledge cards had not detected these problems. When we brought these findings to OPM's attention, letters were sent to many Federal Coordinating Committee chairmen outlining differences in their pledge cards from the OPM prescribed card. We did not attempt to determine the effect these incorrect card formats may have had on the respective campaigns.

In the Little Rock campaign, a PCFO official told us that it received few improperly completed pledge cards. He estimated that only 10 to 15 cards had to be returned for clarification during the 1984 campaign. An Albuquerque campaign official indicated that improperly completed cards are always a problem but could not estimate the extent to which this was the case.

FUND-RAISING COSTS INCREASED IN MOST CAMPAIGNS

In managing local campaigns, PCFOs incur administrative (or fund-raising) costs for which they are reimbursed out of campaign funds. These costs include printing services, computer services, salaries, and various supply costs. The cost amounts are reported annually to OPM for inclusion in the CFC report. Services donated to local campaigns are not included in the computation of their administrative costs.

The following chart shows that, overall, fund-raising costs, as a percentage of contributions, have increased in the 20 campaigns we visited.

	Fund-raising costs as a
Campaign year	percentage of total funds pledged
1982	3.2%
1983	3.6%
1984	3.7%
1985	4.0%
1303	4.08

(The relationship of fund-raising costs to funds pledged in each of the campaigns we visited is shown in app. V.)

PCFO officials in many of the campaigns stated that their fund-raising costs had increased for such reasons as (1) the PCFOs were beginning to charge the campaign for indirect services (e.g. rent, utilities, and other overhead costs) for which they had not charged in the past; (2) there were increased administrative responsibilities required of the PCFOs to implement a new "write-in" provision in OPM's regulations for the 1985 campaign; and (3) general inflation. The new provision for the first time allowed contributors to designate their gifts to any eligible tax-exempt organization providing human health and welfare services in addition to those charities that were identified in the campaign literature. The PCFOs' responsibilities include (1) sending letters asking "write-in" organizations to certify that they meet all the eligibility requirements and (2) returning the donation to the contributor if the organization is not eligible or cannot be located.

In forwarding the new regulation to PCFOs, OPM stated that:

"Gifts to the [PCFO] or to any other recipient should not be made by accident. When a contributor directs his gift to any recipient ... he must be confident that his gift will either be applied as he has directed or be returned to him for clarification, redirection, or cancellation ... All write-in designations must be honored with precision, and where such designations are ineligible, ambiguous, or otherwise difficult to honor, the [PCFO] must contact the donor ... and either ascertain his precise instructions or return his gift to him. This burden is one of the prices that a [PCFO] must bear in exchange for the privileges it receives as the [PCFO]."

(Note: These OPM comments differ from what is actually contained in the regulation concerning the disposition of designations to ineligible write-in charities. The regulation does not provide the option to redesignate the gift. The regulation specifies that when a contributor writes in the name of an ineligible charity, the donation must be cancelled and any funds collected returned to the contributor.)

This new regulation applied only to write-in designations. It did not apply to improperly completed cards with designations to charities that were specifically identified in the campaign literature.

We estimate, based on campaign information reported to OPM as of June, 1985, that about 2.1 percent of the 1.7 million contributors took advantage of the new OPM regulation during the 1985 campaign and designated their gifts to charities that were not identified in the campaign literature. While this was a very small portion of the total personnel participating in the CFC, PCFO officials in 9 of the 20 campaigns said they believe the number could be much larger in the 1986 campaign, and, if this occurs, fund-raising costs could increase significantly.

On July 2, 1985, the Supreme Court ruled that the federal government did not violate the First Amendment when it attempted to exclude legal defense and political advocacy organizations from participating in the CFC. Cornelius v. NAACP Legal Defense and Educational Fund, Inc. At the time we prepared this report, OPM had not determined how this decision would affect the write-in provisions of its CFC regulations.

Extent of services donated to campaigns varied

As the sponsor of the CFC, the federal government donates the services of its employees to provide campaign assistance. Examples include (1) federal employees (referred to by OPM as "loaned executives") who work for the PCFOs full-time for several months coordinating the campaigns' activities, (2) other federal employees (keyworkers) who work part-time soliciting

contributions from the federal work force in every campaign nationwide, and (3) other personnel and offices provided by the federal government in support of the CFC.

Federal employees ("loaned executives") worked for the PCFO in 10 of the 20 campaigns we visited. The number of employees ranged from a high of 45 military and civilian personnel (41 civilian and 4 military) working full-time in the 1984 Washington, D.C., campaign to a low of 1 employee working part-time in the 1984 Little Rock campaign. Using salary data provided by OPM, we estimated that the donated employees' salary costs totaled \$523,950 for the 1984 Washington, D.C., campaign. Had the PCFO been required to include the costs of these donated services, fund-raising costs, expressed as a percent of total funds pledged, would have increased from 4 percent to 7 percent. The PCFO in the Washington, D.C., campaign (as well as all other PCFOs) also relied on other federal employees (keyworkers) to work part-time soliciting contributions. However, we had no data to estimate the costs of these donated services.

In the San Antonio campaign, the federal government paid the salaries of two full-time federal employees who operated a CFC office year-around. The government also donated the costs of the office space. In the Denver campaign, the Air Force donated the services of a part-time secretary; graphic services; and work space, including utilities and telephones, in support of the campaign. We made no attempt to estimate the cost of these donated services.

Earning interest on CFC funds can help reduce fund-raising costs

Although not required by OPM regulations, 17 of the 20 campaigns we visited earned interest on the funds collected before they were distributed to the charities, or in lieu of interest, they received campaign-related administrative services without charge from the financial institutions in which the funds were deposited. This occurred, for example, in the New York and Chicago campaigns where local banks acted as campaign fiscal agents in exchange for maintaining minimum account balances. The campaigns which earned interest used it to partially offset fund-raising costs.

Three campaigns--Washington, D.C., San Diego, and New Orleans--did not deposit idle CFC funds in interest-bearing accounts or receive services in lieu of the interest that could be earned. Although the New Orleans campaign did earn interest on the initial cash received during the solicitation period, it did not earn interest on its biweekly and monthly receipts from federal payroll offices. The initial cash received represented less than 10 percent of the overall campaign receipts.

PCFO officials in the three campaigns stated they did not deposit CFC funds in interest-bearing accounts because they either did not consider it or they felt the money would not be in the bank long enough to earn a substantial return.

To estimate the amount of interest that could be earned on CFC funds, we obtained an account analysis for a three month period from the bank used in the San Diego 1984 campaign. This analysis provided detailed records of the financial activity in the campaign's non-interest-bearing checking account, including the average balance on hand in excess of the amount required to prevent service charges. We then applied the interest rates available at the time as shown in Federal Reserve Bulletins to the average balance.

The bank serving the Washington, D.C. campaign told us they could not provide us with an account analysis even though United Way gave the bank its permission to release this information to us. However, we believe this information is commonly used for cash management purposes, and it is usually readily available to a bank's institutional customers. The only information that the bank could provide was an average daily balance for the period from June 1984 to June 1985. We did not request an account analysis from the bank serving the New Orleans campaign.

We estimate that the San Diego campaign could have earned nearly \$15,000 in interest if the PCFO had placed the funds in an interest-bearing account. These interest earnings would have offset the fund-raising costs at the San Diego campaign by about 10 percent. The Washington, D.C., campaign's average daily balance held in a non-interest-bearing account was over \$275,000. This balance was considerably in excess of what was necessary to avoid bank service charges and a substantial portion of the idle funds could have been earning interest.

CONCLUSIONS

On the basis of our review of pledge card processing in 16 campaigns nationwide, we believe federal personnel generally can feel confident that their contributions to the CFC will be properly accounted for and paid to designated charities if they complete the pledge cards properly. However, because of the absence of an OPM regulation on the disposition of improperly completed cards, the PCFOs in some campaigns did not contact thousands of contributors who submitted improperly completed pledge cards. As a result, the donations were not paid to the charities that the contributors had designated on the cards. We believe OPM needs to correct this matter in its regulations.

Although some improperly completed cards can be expected in any campaign, we believe the large number of improperly completed cards in Norfolk and St. Louis can be primarily attributed to the PCFOs' use of improperly designed pledge cards. However, the absence of a regulation requiring follow-up on improperly completed pledge cards was also a factor contributing to the significant number of contributions that were not distributed to the correct charities in these campaigns.

Requiring all PCFOs to contact contributors to clarify unclear designations on pledge cards, already the practice in many campaigns, should provide an incentive for PCFOs to (1) develop pledge cards that are easy to understand and fill out, and that are in compliance with OPM's prescribed format and (2) emphasize to keyworkers the importance of assuring that pledge cards are properly completed when they are collected during the campaign. This should, in turn, reduce the number of improperly completed cards and the need for contacting contributors.

PCFOs in 3 of the 20 campaigns we reviewed did not earn any interest on idle CFC funds. Interest earnings in these campaigns could have partially offset fund-raising costs if CFC funds had been placed in interest-bearing accounts. Each additional dollar of fund-raising costs is one less dollar that participating charities receive.

RECOMMENDATIONS

We recommend that the Director, OPM, require PCFOs to:

- --Contact all federal personnel who submit improperly completed pledge cards for clarifying instructions. If the PCFO is unable to contact the contributor, the Federal Coordinating Committee in each campaign should decide how the designated funds will be distributed.
- --Either (1) earn interest on idle campaign funds to offset administrative costs or (2) receive services from the financial institutions holding the funds comparable in value to the amount of the interest that could be earned.

As arranged with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the date of the report. At that time, we will provide copies to other congressional committees; the Director, OPM; and other interested parties.

Sincerely yours,

Comptroller General of the United States

NUMBER OF 1984 CONTRIBUTORS AND AMOUNT OF FUNDS PLEDGED IN THE 20 LOCAL CAMPAIGNS REVIEWED

Campaign ^a	Number of contributors ^b	Percentage of nationwide contributors	Total funds pledged	Percentage of nationwide funds pledged
Little Rock, AK	8,278	0.36%	\$337,753	0.31%
San Diego, CA	96,560	4.17	4,032,715	3.69
Denver, CO	20,075	0.87	1,297,307	1.19
El Paso County, CO	19,054	0.82	562,530	0.51
Washington, DC	234,467	10.12	16,073,844	14.71
Honolulu, HI	58,718	2.53	2,241,773	2.05
Chicago, IL	34,151	1.47	1,514,389	1.39
New Orleans, LA	10,407	0.45	582,503	0.53
Detroit, MI	16,257	0.70	862,182	0.79
Lansing, MI	1,136	0.05	69,879	0.06
Minneapolis - St. Paul MN	9,156	0.40	519,141	0.48
St. Louis, MO	24,757	1.07	1,387,042	1.27
Ft. Monmouth, NJ	5,262	0.23	210,528	0.19
Albuquerque, NM	9,348	0.40	449,454	0.41
Long Island, NY	8,338	0.36	406,530	0.37
New York, NY	32,410	1.40	1,239,739	1.13
Cleveland, OH	11,000	0.47	841,151	0.77
San Antonio, TX	65,444	2.82	4,622,614	4.23
Norfolk, VA	97,651	4.21	3,871,439	3.54
Richmond, VA	5,478	0.24	221,060	0.20
Totals	767,947	33.14%	\$41,343,573	37.82%

 $^{^{\}mathtt{a}}$ The United Way was PCFO in all 20 campaigns. $^{\mathtt{b}}$ These numbers include the pledge cards of U.S. Postal Service employees.

APPENDIX II APPENDIX II

DETAILED DESCRIPTION OF METHODOLOGY

To determine if contributors' donations were accurately recorded and paid to the appropriate charities, we compared the funds designated on random samples of 1984 pledge cards in 16 campaigns with the designations that the PCFOs recorded in their accounting systems used to make payments to charities. For pledge cards with no specific charity designations (those funds deemed designated to the PCFO) we checked the cards to ensure they did not contain other designations. We could not review PCFOs' processing of pledge cards in four other campaigns in our review because information was not recorded in the PCFOs' accounting systems to identify individual pledge cards.

The samples were designed to allow us to project our findings to the universe of pledge cards in each campaign. The only pledge cards that we could not include in our sample were cards from U.S. Postal Service employees. PCFOs return these cards to the Postal Service after entering the information from them in their accounting systems.

Because we reviewed a statistical sample of pledge cards in 16 campaigns, each estimate developed from the samples has a measurable precision, or sampling error. The sampling error is the maximum amount by which the estimate obtained from a statistical sample can be expected to differ from the true universe characteristic (value) we are estimating. Sampling errors are usually stated at a certain confidence level - in this case 95 percent. This means, the chances are 19 out of 20 that, if we reviewed all pledge cards in each campaign, the results of such a review would differ from the estimates obtained from our sample by less than the sampling errors of such estimates.

At the 95 percent confidence level our maximum sampling errors do not exceed 1.2 percentage points for the universe estimates in this report. In other words, the chances are 19 out of 20 that in each campaign the estimated number of pledge cards processed in accordance with OPM regulations will be within 1.2 percentage points of the corresponding true universe characteristic (value).

Sampling errors are used to compute the confidence intervals contained in this report. Thus, the chances are 19 out of 20 that, if we reviewed all pledge cards in each campaign, the results of such a review would be contained in the confidence interval shown in this report for that campaign.

APPENDIX II

To determine if CFC fund-raising costs have increased in recent years, we reviewed PCFOs' administrative expenses for the 1982 through 1985 campaigns. In those campaigns where fund-raising costs were increasing, we interviewed PCFO officials to determine the reasons for the increases. We also interviewed PCFO officials to determine what, if any, federal services were donated to the campaign which the PCFO is not required to budget for or report to OPM.

APPENDIX III APPENDIX III

DESCRIPTION OF THE

CFC FISCAL PROCESS

Our review covered the cycle of events which occur from the time federal personnel make their pledges until the time charities actually receive the funds. The cycle starts with the initial receipt of pledge cards and cash contributions obtained during the fall solicitation period. The cycle continues with the receipt of donations from payroll deductions during the subsequent payroll year beginning in January and ends with the periodic payments by the PCFOs to the participating charities and federations of charities through the following December.

In making a contribution an employee can make an immediate cash gift or authorize payroll deductions for the succeeding payroll year. Ordinarily, a three-part pledge card is used to report and account for contributions. (The pledge card prescribed by OPM is shown on page 10 of app. IV.) Each pledge card shows the employee's name, the amount pledged, the method of contribution (whether through cash gift or by payroll deduction), and, if applicable, the charity or charities designated to receive the contribution. When the employee makes a cash donation, the federal agency keyworker—a federal employee assigned for a limited time to solicit contributions from fellow employees—forwards the pledge card and cash to the PCFO. If the gift is made through payroll deductions, one copy of the pledge card goes to the employee's payroll office and one copy goes to the campaign fiscal agent.

The accounting process begins during the fall solicitation period when federal agency keyworkers prepare envelopes containing employees' completed pledge cards and any cash donations to be submitted to the campaign. Keyworkers then deliver these envelopes to the PCFO's central receipt point. Once received, PCFO personnel conduct a preliminary review of all envelopes and verify key information, such as the name of the federal agency, number of contributors, dollar amounts, and method of contribution. Once the initial review is completed, the contents of each envelope are audited—usually by personnel other than those who conducted the initial review. PCFO personnel review each pledge card for completeness and verify the amount of cash contributions received in each envelope. Some campaigns refer improperly completed pledge cards back to keyworkers for corrections.

After pledge cards are reviewed they are batched and entered into the accounting system. The amount of information

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captured from a pledge card varied by local campaign. All systems recorded at least the amount of the contribution and the designated charity or charities, if any. Some more elaborate systems recorded all information written in by the contributor, including names and home addresses. In 16 of the 20 systems reviewed, an audit trail existed so that the information from a contributor's pledge card could be traced back to that particular pledge card. In other words, it was possible to determine if the information from each pledge card was accurately entered into the accounting systems, including the amount donated to individual designated charities. In the remaining four systems, it was not possible to trace designation information back to individual pledge cards because the systems contained no data elements to identify individual pledge cards.

After all pledge cards are entered into the accounting system a designations report is compiled. This report shows the aggregate amounts pledged to each charity. Some campaigns can even break this information down by source, such as the various federal agencies participating in the campaign.

During the payroll year following the fall solicitation period, federal agency payroll offices begin remitting employee payroll deductions to the campaigns. The payroll deductions are made 26 times a year for civilians and 12 times a year for military personnel. The payroll offices send the checks directly to all local campaigns where their employees participate. Normally each agency issues individual checks to each campaign covering all contributors and their payroll deductions for the period. For the 1984 CFC campaign, approximately 89 percent of pledges were made by payroll deduction, according to OPM.

Local campaigns are required to distribute CFC funds to the charities and/or the federations of charities either monthly or quarterly depending on the total annual amount of pledges. The payments are sent directly to the four federations described below which make up every local campaign. These federations then distribute the contributions to their member charities. PCFOs also make direct payments to the few local nonaffiliated charities participating in most campaigns.

OPM has divided the CFC participating charities into four categories (or federations) to facilitate campaign administration.

1. United Way--This federation consists of local United Ways that are members of, or are recognized by, United Way of America. Local community organizations, such as the Salvation Army and Boy Scouts of America, are generally United Way members. Each community's United Way determines its own membership. The charities

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admitted as United Way members automatically participate in the CFC without any certification or screening by OPM.

- 2. National Health Agencies—This federation includes health services organizations, such as the American Heart Association, Inc., and the National Kidney Foundation. In some local campaigns, some national health services organizations are affiliated with the United Way.
- 3. <u>International Service Agencies</u>—This federation includes international organizations such as CARE and Project HOPE. These organizations provide most of their services outside of the United States.
- 4. National Service Agencies—This federation includes diverse organizations, such as the National Committee for the Prevention of Child Abuse, the United Negro College Fund, and various legal defense funds and advocacy groups. National Service Agency members were first admitted to the CFC in 1980.

United Way is an independent voluntary fund-raising organization permitted by OPM to solicit CFC contributions from federal personnel. The three other federations were created by OPM strictly to simplify management of the CFC. This meant that OPM could deal with committees elected by the charities within each group to represent them on policy and program matters rather than dealing with each charity individually. However, beginning with the 1985 campaign, OPM no longer made decisions on the membership of the federations. Such decisions were made by the federations themselves.

In addition to these four federations, charities which are unique to a locality and are not affiliated with any charitable group (referred to as local nonaffiliated agencies) participate in the CFC. Like the National Service Agencies, they were admitted to the CFC for the first time in 1980. Also, in some campaigns the American Red Cross is considered a separate federation, but in others it is affiliated with the United Way.

Many of the campaigns we visited distributed CFC funds to the federations according to percentages determined by each PCFO at the end of the solicitation period. The percentages represent each charity's share of the total designated and undesignated contributions. Each month as funds arrive from the federal payroll offices the charities share in whatever donations are available at their pre-established percentage rate (less fund-raising costs).

DESCRIPTION OF THE NORFOLK AND ST. LOUIS CAMPAIGNS

Norfolk

The 1984 Norfolk pledge card required contributors who wanted to designate their contributions to sign their names twice rather than once as OPM prescribed. In addition, the spaces for designating contributions on the Norfolk pledge card were on the back of the card rather than on the front. A copy of the pledge card is shown on pages 11 and 12 in this appendix.

PCFO (United Way) officials in Norfolk explained that they began requiring two signatures for designations several years ago when they found evidence on some pledge cards that someone other than the contributor wrote in designations to a particular charity. The officials consider the second signature (which is supposed to appear immediately below the last designation) to be an important control that should help preclude one person from writing designations on another person's undesignated pledge card. The campaign literature stated that designations on pledge cards without the required signatures would not be honored and that all such designations would be deemed designated to the PCFO. As a result, PCFO officials considered any pledge cards without the second signature as being incomplete. The PCFO officials in Norfolk made no attempt to send the incomplete pledge cards back to the contributors to obtain the required signatures or to contact the contributors to confirm that the designations on the cards were valid. There is no OPM regulation that requires PCFOs to do this.

To estimate the amount of money that the Norfolk PCFO did not pay to the designated charities, we reviewed a random sample of 4,234 pledge cards (or 5 percent of the total non-Postal Service pledge cards in the campaign). We estimate that from 20 to 34 percent of the pledge cards, or from 17,201 to 29,271 total non-Postal Service pledge cards in the campaign, were not correctly completed. On the basis of the results of our random sample, we estimate that, of the \$3.9 million contributed in the 1984 campaign, the Norfolk PCFO received from \$852,806 to \$1,496,814 that should have gone to charities designated by the contributors.

The four federations of charities and the projected confidence intervals of additional amounts they should have received are shown below along with the projected confidence intervals of

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additional amounts designated to charities not represented by a federation (local nonaffiliated).

	From	To
National Health Agencies	\$313,528	\$551,484
United Way	282,241	541,953
International Service Agencies	85,826	209,120
National Service Agencies	53,181	113,471
Local Nonaffiliated	59	2,851

Some examples of individual charities and the projected confidence intervals of additional amounts they should have received are shown below.

	From	To
American Cancer Society	\$ 74,674	\$155,002
American Heart Association	57 , 555	114,213
Muscular Dystrophy Association	35,633	86,275
AMC Cancer Research Center Society for the Aid of Sickle	33,768	84,780
Cell Anemia	30,428	86,324

Norfolk PCFO officials stated that beginning with the 1985 campaign, they began honoring designations on all pledge cards regardless of whether there was a second signature. The amount of funds designated in the 1985 Norfolk campaign, after the PCFO changed its policy, increased from 40.8 percent in 1984 to 65 percent in 1985. A PCFO official attributed this increase to OPM regulatory changes in 1985 that allowed contributors to give to any tax-exempt human health and welfare organization by writing in the name of the organization on the pledge card. However, we found that the total amount of funds pledged in the 1985 Norfolk campaign under the new OPM "write-in" regulation totaled \$94,000 while there was an overall increase of \$1.1 million in designated funds.

St. Louis, Missouri

In the St. Louis campaign, the space on the 1984 pledge card where contributors were supposed to indicate the part of their total annual gift they wanted paid to a particular charity did not specify "annual amount" as OPM prescribed. Rather, the space was simply labeled "amount." (A copy of the card is on page 13 of this appendix.) The St. Louis CFC literature did not explain the term "amount."

¹The Norfolk PCFO (United Way) paid 94.3 percent of all undesignated contributions in the 1984 compaign to its member charities and 5.7 percent to the International Service Agencies.

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During our review we became concerned that since the pledge card did not specify "annual amount," contributors using payroll deductions might have indicated in the space marked "amount" the part of their total annual gift that was to be deducted from their paychecks each pay period rather than the total amount to be deducted from their paychecks during the entire year. For example, if a federal employee wanted to designate his/her annual gift of \$260 to one charity, the employee was supposed to write the \$260 amount in the appropriate space on the pledge card. However, if the employee was confused by the term "amount" on the card, he/she might put the \$10 to be deducted for a single pay period in that space instead of the annual amount.

PCFO officials in St. Louis explained that their policy was to honor whatever designation instructions appeared on the pledge card. After discussing this matter with a St. Louis PCFO official, he told us he reviewed 38 percent of the 16,321 designated pledge cards in the entire campaign to determine how many contributors had written in the biweekly amount, rather than the annual amount, on the card. The official found that 8.7 percent of the cards reviewed had the biweekly amount rather than the annual amount. Projecting the results of their sample to the entire campaign, St. Louis PCFO officials estimated that the PCFO received about \$91,000 in contributions that probably should have gone to specific charities. PCFO officials changed the pledge card used in the 1985 campaign to say "annual amount" rather than "amount."

The percent of designated funds in the 1985 St. Louis campaign, using the revised pledge card, increased from 62 percent in 1984 to 75 percent in 1985. However, the PCFO official did not believe that the increase was the result of changing the pledge card. Rather, he attributed the increase primarily to more intensive efforts by keyworkers to explain to contributors how to properly complete the card.

PLEDGE CARD FOLLOWING OPM FORMAT

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\$	\$25.00	\$19.00	\$13.50	\$9.00	\$5.50	1	\$3.50	Combined Fund Organization for the Natio Capital Area to distribute your gift based determination of needs.
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NORFOLK 1984 PLEDGE CARD

PCFO COPY - FRONT

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NORFOLK PLEDGE CARD (CONTINUED)

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APPENDIX Y

FUND-RAISING COSTS AS A PERCENT OF TOTAL FUNDS PLEDGED IN THE 20 CAMPAIGNS REVIEWED

	1982 %	1983 %	1984	1985
Little Rock, AR	8.6	8.4	8.2	7.8
San Diego, CA	4.1	3.8	3.9	3.8
Denver, CO	2.8	2.9	3.1	3.7
El Paso County, CO	2.6	3.8	3.3	3.4
Washington, D.C.	3.7	3.9	4.0	4.0a
Honolulu, HI	1.8	1.6	2.3	3.0
Chicago, IL	4.1	6.6	5.7	5.1
New Orleans, LA	5.8	7.0	8.7	9.6
Lansing, MI	4.1	4.1	5.6	5.0
Detroit, MI	2.3	2.8	2.3	2.4
Minneapolis - St. Paul MN	3.2	4.9	3.7	5.0
St. Louis, MO	4.0	4.7	5.7	5.3
Ft. Monmouth, NJ	1.7	1.9	2.0	3.4
Albuquerque, NM	1.5	3.7	5.8	7.5
Long Island, NY	3.9	4.4	4.8	5.7
New York, NY	4.4	8.9	10.0	10.5
Cleveland, OH	5.0	5.0	4.7	4.8
San Antonio, TX	1.0	1.1	1.5	2.0
Norfolk, VA	1.8	2.0	0.9	2.4
Richmond, VA	5.4	5.1	5.5	6.0
Overall average	3.2	3.6	3.7	4.0

aEstimated by PCFO officials (966187)



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