



ETHICS GUIDANCE FOR COORDINATORS AND KEY WORKERS FOR THE COMBINED FEDERAL CAMPAIGN (CFC)

DO

DON'T

PREVENT COERCIVE ACTIVITY – TRUE VOLUNTARY GIVING (5 CFR 950.108)	
Encourage support for the CFC for example through non-solicitation events, such as campaign kick-offs, victory events, awards, etc.	Supervisors (or anyone in their supervisory chain of command) shall not solicit employee participation.
Supervisors may receive summary information of branches they supervise.	Supervisors may not inquire about whether an employee chooses to participate or not participate or the amount of an employee's donation.
Establish a truly voluntary giving atmosphere that allows free choices by employees.	May not set a 100 percent participation goal or establish personal dollar goals and quotas.
Provide and use contributor lists for routine collection and forwarding of contributions and allotments.	May not develop and/or use lists of non-contributors.
AVOID CONFLICT OF INTEREST (5 CFR 950.109) AND (5 CFR 2635.702)	
Supporting the activities of CFC as Keyworkers and Coordinators is open to all Federal employees.	CFC Coordinators and Keyworkers must not serve in any official capacity in any organization that serves as the Principal Combined Fund Organization (PCFO) of the local CFC (see example 1).
SOLICITATION METHODS (5 CFR 950.602)	
Employee solicitations shall be conducted during duty hours using methods that permit true voluntary giving.	Must not disclose gift giving or contribution without an employee's consent.
CFC special fundraising events should be undertaken in the spirit of generating interest in the CFC and be open to all individuals without regard to whether an individual participates in the CFC.	Must not associate chances to win from amount of contributions, if any. Raffle prizes should be modest in nature and value (see example 2).
GIFTS FROM OUTSIDE SOURCES (5CFR 2635.202)	
You may contact the USDA CFC Campaign Manager responsible for the USDA CFC campaign about gifts that can be used as prizes at fund-raising events; or accept employee donations.	Must not, directly or indirectly, solicit or accept gifts from any prohibited source (any person or organization that does business with USDA); or because of your official position.

Remember: The CFC is the only authorized solicitation of employees in the Federal workplace on behalf of charitable organizations. There are ethics considerations of which employees should be aware regarding activities of the CFC, specifically with the potential of using public office for private gain, and fundraising events where there are “games of chance.”

Example 1 – Public Office for Private Gain

Rule: You may not use your official position, title, or authority to benefit yourself or anyone else. Specifically, you may not: endorse any product, service, or enterprise; induce/coerce a benefit for anyone; or give the appearance of government sanction of private activity.

Example: Karen, an RD employee, is also a member of a non-profit charitable organization in her community. During the CFC season, USDA encourages its employees to contribute to charitable groups approved as CFC participating organizations. The charity that Karen is affiliated with has been deemed eligible as a CFC participant.

Among his other tasks, Mark, a friend and former co-worker of Karen’s at RD, is responsible for choosing health-related charities to participate in the CFC “kick-off” event. Based on her relationship with Mark, Karen asks if her charity could be among those spotlighted at the CFC kick-off event. If in attendance, she would participate and serve as the spokesperson for this organization, not as an RD employee.

Karen must not take such a role in any CFC event. If she did, she would violate the standards of conduct regulation because she would be using her Federal position to promote the private gain of a charity with which she is affiliated. Aside from the misuse of position issues, Karen’s representation of this charity could raise some other concerns. It could convey the impression that USDA supported her particular charity over the others not chosen to be highlighted at the kick-off event (which could then violate the appearance of a governmental sanction). In addition, if Karen were permitted to speak at the kick-off on behalf of her charity, this could also open the door to other USDA employees who might ask for similar preferential treatment for organizations with which they are affiliated.

Example 2 – Gambling

Rule: Employees are prohibited from gambling while on duty, or while on government-owned or leased property.

Example: Mary wants to ensure the CFC drive is a success and is organizing a raffle. The raffle will only be open to USDA employees who present a completed CFC pledge card and buy a \$5 raffle ticket. Mary plans to give the proceeds of the raffle ticket sales to the CFC general fund. All raffle tickets will be placed in a box, and the winner will receive two tickets to a professional basketball game. Steve, Mary’s next door neighbor, has two premium stadium seats, and Mary wants to ask him to donate them for the CFC raffle. The seats are worth \$300 each. Since Steve is a former USDA employee and CFC coordinator, Mary knows he will be happy to donate them.

This proposed raffle is not a suitable CFC event. It violates the gambling in the workplace rule because it constitutes a game of chance (see below). Likewise, it does not comply with the CFC rules: CFC events must be open to all USDA employees, regardless of CFC contribution or participation. In addition, federal employees must not solicit donations from outside sources (former employees are considered outside sources). Finally, the proposed prize value is excessive. CFC event “prizes” must be reasonable in value and modest in nature.

Please be mindful of this rule because “fundraising” efforts can sometimes cross the line into gambling when they include “games of chance.” Creativity in development of fundraising efforts can avoid this problem. Lottery-type games, door prizes, and similar events do not constitute gambling as long as they do not include: (1) A **game**^{*} of chance, (2) **Consideration**[†] for the opportunity to play the game, and (3) An offering[‡] of a **prize**. Events that do not include all three of these elements are not considered gambling and are permitted events. For example, a drawing that chooses from all employees who attend an event is not gambling where the participants are not required to furnish consideration. (**TIP:** Event advertising should also clearly indicate that CFC contributions and participation are not required.)



A **game of chance** includes, but is not limited to, a raffle, lottery, sports pool, game of cards, the selling or purchasing of a numbered slip or ticket, or any game for money or property. [†]**Consideration** includes a participation fee, a wager of money, or something of value in return for the possibility of winning a reward or prize. An offering[‡] of a **prize** includes a monetary award, or a tangible or intangible item. Examples include meals, drinks, administrative leave, gift certificates, tickets to events, or cash.

Contact your Ethics Advisor if you have questions: <http://ethics.usda.gov/advisor-list.htm>.