



United States  
**Office of Government Ethics**  
1201 New York Avenue, NW., Suite 500  
Washington, DC 20005-3917

March 22, 1994  
DO-94-013

MEMORANDUM

TO: Designated Agency Ethics Officials

FROM: Stephen D. Potts  
Director

SUBJECT: Fundraising Activities

In response to the inquiry to which we referred in our DAEOgram dated August 25, 1993, the Director of the Office of Personnel Management (OPM) has advised the Office of Government Ethics (OGE) that the collection of nonmonetary items such as food and clothing at the Federal workplace is not a solicitation of charitable contributions covered by the Combined Federal Campaign (CFC). Thus, such activities do not require the express written permission of the Director of OPM under section 4 of Executive Order 12353 and the CFC regulations, at 5 C.F.R. § 950.102(a).

In light of this guidance from the Director of OPM, OGE recommends that agencies continue to resolve questions about Federal employees' nonmonetary charity drives at the Federal workplace by referring to the provisions of the Standards of Ethical Conduct in 5 C.F.R. part 2635, particularly the provisions in subpart G regarding "Misuse of Position;" and to the Federal Property Management Regulation issued by the General Services Administration (GSA), at 41 C.F.R. § 101-20.308, or equivalent property management regulations for Federal workplaces that are not GSA-controlled.