

# Guidance for Attachment A, Description of Services

Attachment A to your application is often called the Description of Services, or DOS.

Despite that unofficial name, the primary purpose of this document is *not* to give a comprehensive overview of your programs. It is to show how your programs meet the CFC eligibility requirements. Anything that does not relate to these eligibility requirements is irrelevant and makes your application harder to evaluate. **Ideally, your DOS will be 1-3 pages total.** It can be longer, but 1-3 pages should be sufficient in most cases.

The DOS supports the first certifying statement in the CFC application. This statement affirms that the applicant organization “provided or conducted real services, benefits assistance or program activities in 15 or more states or one foreign country over the three-year period immediately preceding the start of the campaign application year.” **For the 2016 application, the relevant years are 2013, 2014 and 2015.**

The government’s instructions for this attachment say that “the document must make a clear showing of national and/or international service.” Just what constitutes a “clear showing” is the issue addressed in the remainder of the document you’re reading now.

We offer guidance in four areas:

1. Organizing the DOS
2. Using evidence that works (and avoiding evidence that doesn’t)
3. Knowing what to do if you have chapters or if you are an advocacy group
4. Understanding the government’s “de minimis” test

## 1. Organizing the Description of Services

**Note: If you are a returning member, please continue using the final format in your previous year’s CFC application, unless our admissions advisors suggest a different approach.**

We recommend organizing your DOS in two parts:

1. A brief (one or two page) narrative summary of your organization’s work
2. A table or spreadsheet – the government calls it a schedule – that gives enough detail to show compliance with CFC requirements.

The purpose of the narrative summary is to give context for understanding the table or spreadsheet. It is also the place where you make clear how your organization’s work benefits people, if necessary. (Providing some benefit for human beings is a CFC requirement, and you may need to address this issue if, for example, your organization’s mission concerns animals or the environment.)

The schedule is where you provide the specific information the government requires to evaluate the reach and impact of your work. Concrete detail is essential. (We’ll discuss the nature of the detail on the next page.) The goal is to give a clear picture of individuals in your organization performing specific activities for the benefit of other individuals, at specific times and in specific places. If you find it difficult to think of your organization’s work in these terms, our admissions advisors can help.

If you are describing services within the U.S., list all the states in which you were active even if the number goes over fifteen. The government occasionally surprises us in the way they evaluate certain activities. If one state is unexpectedly disqualified, the “extra” states will prevent you from falling below fifteen.

Similarly, if your organization seeks to qualify through overseas services, we recommend that you describe services in more than one country if you can. Ultimately, it will be the services in a *single* country that will qualify the organization; the “extra” countries will only serve as insurance in case the services described in the first country are declared insufficient.

Provide the following key information for each event you describe:

- **The location of the service or activity**

If the service or activity occurred within the U.S., indicate the city and state. If the service or activity was overseas, indicate the country and, if possible, the city as well.

- **The nature of the service or activity**

Was it a speech? If so, what was the topic? Was it advice? If so, what was the technical matter? Was it a grant? If so, tell us how much was given, what activity it supported, and the location of the recipient.

- **The timing of the event**

Tell when the service occurred – year and month; if you have more specific dates, please include them. If the activity occurred over a period of time, give the start and end dates. If the service continues, you may note that it is “ongoing,” but *you must also note the start date and that it continued through December of 2015*. For grants and scholarships, give dates (month and year) when funds were disbursed.

- **The beneficiaries**

Tell how many individuals you served. If someone gave a speech, give the number of people in the audience. If you provided advice, say how many people you advised. If you gave a grant or scholarship, say who received it. (You may use initials or other means to hide individual identities if you believe this information is sensitive.)

### **Pitfalls to avoid**

- **Long narrative paragraphs.** The government is looking for simple statements of the work you did. Focus on providing the Who/What/Where/When data as described above.
- **Vague phrases or long time periods.** Do not use a phrase like “technical assistance” without explanatory detail. Do not say “over the past three years,” or “during 2013-2015.” State what you did (e.g., gave a speech, provided legal advice on a certain issue, staged a performance) and include specific dates, places, occasions, services and beneficiaries.
- **Passive participation.** Simply attending a conference does not count. You need to say what you did at the conference that benefited others who were there.
- **Passive verbs.** If you say “20 orphans were fed and sheltered,” it is not clear who did the feeding and sheltering. Instead, say “ABC Org fed and sheltered 20 orphans” or simply “We fed. ...”

## Sample schedule

Location	Date(s) of Service	Description of Service, Benefit, Assistance, or Program Activity	Beneficiaries
San Diego, CA	June 1-3, 2013	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 healthcare industry professionals attended the three-day conference.
Florida	Calendar Year 2014 – funds disbursed monthly	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"> <li>• A. Smith, Pensacola (\$3,800)</li> <li>• J. Doe, Ft. Lauderdale (\$5,000)</li> <li>• B. Callahan, Jacksonville (\$1,200)</li> <li>• D. Johnson, Tampa (\$800)</li> <li>• C. Jones, Ft. Myers (\$900)</li> </ul>	5 Florida high school students
Erie, PA	July 9, 2015	ABC Environmental Trust provided a two-hour training to volunteers of the conservation of Erie County beaches. Training also included the distribution of garbage bags, plastic gloves, and orange vests. The one-day conservation effort resulted in the collection of 250 pounds of garbage.	23 volunteers trained and 10 miles of beaches cleaned.

## 2. Using evidence that works (and avoiding evidence that doesn't)

The activities listed below are most likely to be seen by the government as qualifying:

### A. Your staff travels to another state or country to deliver a service

If your staff travelled to another state or country to provide a service, that activity likely will count as a qualifying service. Describe how a representative of the organization served people in person in that location.

If your organization had an office in more than one state or overseas during the three-year period, you can count those additional states or countries if you give the street address and phone number of each office, the size of the staff there, and a brief description of the work they do.

A performing arts organization can qualify if its company travelled to other states and/or another country to perform. Say where and when the performances occurred and how many were in the audience.

### B. Financial transfers

If your organization sent money to individuals or organizations in another state or country (excepting payment of vendors) that will likely count as a qualifying service. Examples of such transfers are scholarships, fellowships, awards and grants. In the case of scholarships, etc., count the student's home state or country, not the state where the student went to college.

If your organization paid for individuals to travel to your office to receive a service, describe those costs and the services received, and list the beneficiaries including their place of origin. If you covered travel-related costs such as food and lodging, mention the amounts of these expenses.

For fellowships or internships, make sure to explain how the fellows or interns benefited. If these posts simply saved your organization money, the government may disregard them.

### C. Technical advice

If your staff provided professional advice by phone or email, that may contribute to a successful DOS, though an organization cannot qualify through this kind of activity alone. For service of this kind to qualify:

- The advice must have been *specific to the situation of the individual client*
- The advice must have involved *real professional expertise*, not just the routine information
- Communication must have gone in *two directions*: that is, you gave the client help, but the client also communicated with you, perhaps through direct conversation, or sending questions by email, providing feedback through a survey, etc.

When detailing “technical advice,” be sure to describe in detail the help you offered, whom you helped, and when you provided the help.

### D. Services through the Web

Web-based services can qualify if you submit logs or other records indicating the geographic distribution of users and the scope of services received *AND* you can meet two of the following three tests:

- You show that recipients of the service registered for use of the website (provide examples of the registration process)
- You show that the people being served provided feedback through surveys or other methods
- You show that people paid a fee for the service.

### E. Traveling exhibitions or productions; lending valuable objects

If a museum creates an exhibition that travels to another state or country, that is excellent evidence for the DOS (but please include attendance figures). The same is true of a theatre company that sends a production to another state or overseas. There can be subtleties in these cases. We recommend you consult our staff if you intend to use this kind of evidence.

## EVIDENCE THAT PROBABLY WON'T WORK (but note an exception!)

### Publications

**The rule.** The government gives little weight to anything it views as a publication. The government explains that making something available – publishing it – does not mean that anyone has read it. This policy usually applies to:

Books, pamphlets	Teaching kits
Research reports	Websites
Position papers	List-serves
Amicus curiae briefs	Toll free numbers

**The exception.** Any of the above activity can be a qualifying activity if you can show that the recipient requested the item, used the item, and/or benefited from the item. If, for example, someone asked for a research paper to be prepared, the government would be more likely to accept the service. If you can show that teaching kits were requested and used, such activity would likely be fine. If a court or a legislative committee requested a brief, that would likely work. Even a toll free number could be fine – if you can show in detail how your organization supported callers with professional service.

## General participation and indirect beneficiaries

**The rule (no exceptions).** You CANNOT count the home states of people merely on the grounds that:

- They were members of your organization
- They belonged to an organization affiliated with you
- They attended a conference you sponsor (only the state where the conference was held counts)
- They travelled to your location and viewed your exhibition or attended your performance (unless you subsidized the visit through a scholarship or grant)
- They benefitted from the actions performed by organizations you have assisted
- They visited your website, signed up for your list-serve, or bought your books

## 3. What if you have chapters or if you are an advocacy group?

As noted above, you cannot claim credit for anyone beyond the direct beneficiaries of your work. So, while you can argue that you have benefited a chapter, affiliate or government agency by any of the acceptable means described above, *do not claim credit for the work carried out by that benefiting entity even if they clearly made use of your resources.*

### Chapters

To claim states in which you have chapters, you must describe the services you provided to the chapters, *not the services the chapters provided to others.* For example, the following would be qualifying services:

- You provided substantial materials, technical advice, programs, support and/or coordination for your chapters (more than just publications)
- You ran events available to and used by your chapters
- There was ongoing two-way conversation between you and the chapters that supported chapter operation
- You collected and disseminated information about other chapters' activities, helping chapters communicate with each other

### Advocacy groups

Advocacy groups providing expertise to government agencies or the courts must describe services that went beyond sending information such as research reports or amicus curiae briefs. Those who successfully use such activity in their DOS show that the recipients sought the advice. If they used the advice, that is all the better. It is best if you can show that there was a genuine conversation with the government entity – a two-way conversation to support your claim that the agency benefited from your advice.

If you worked with a government entity, you must “count” that entity in the state where it was located. So, if you dealt with the headquarters of a federal agency, the personnel were likely based in Washington DC – and you should “count” DC. If you worked with federal personnel in Boston, you would “count” Massachusetts.

Even if you participated in a successful case before the U.S. Supreme Court, you only can “count” Washington DC. It does not matter that the impact of your case rippled across the country. Similarly, if a federal agency used your advice and then changed how it delivered services across the country, you only are allowed to count the state (or DC) where you went to help that agency.

The same principle applies to groups that have an international focus but do most of their work by talking to people in Washington DC. It is much safer to try to qualify by showing that your staff has set foot on foreign soil.

## 4. Understanding the Government's De Minimis Test

The federal government reserves the right to determine whether services or benefits are “de minimis” – that is, too small to have significant impact.

Factors that the government will consider in determining whether an organization's 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.

While the government does not publish a definition of “de minimis,” our experience indicates that the following cases would risk falling below the government's standard of what is sufficient.

### **Case 1: A small number of people served**

The government has indicated that if the organization worked with only a few persons in a state or country, that service could be considered de minimis. While the government has not published the number of beneficiaries that an organization must report that it served in a state or country, we suggest that applicants show at least 5 individuals per state or country.

Organizations can show that they served other organizations. We recommend showing that you served at least three organizations in a state or country.

### **Case 2: A small amount of transferred funds**

Financial assistance (e.g. scholarships) in a state or country that totals less than \$5,000 may be seen as de minimis. An organization can show that it provided numerous scholarships or similar financial transfers; the point is that they should total \$5,000 or more in a state or country.

### **Case 3: Limited foreign activity**

With regard to international activity, the government seeks evidence that the services were *ongoing*. So, if the organization provided a speaker to a conference in London, that activity alone would not be sufficient to allow Britain to be counted. You would need to show repeated visits to Britain during the three relevant years, or to show a mixture of qualifying activity in Britain such as two or three speeches, other travel by staff, technical assistance provided by phone and email, and/or financial transfers.

Note also that the government prefers evidence of ongoing activity in one country; activity scattered across several countries is not as compelling – to the government – as multiple events in a single country.

The “de minimis” test is subject to change by the government. We encourage applicants to contact us if they have questions on whether their activity is sufficient.