



DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY MANEUVER CENTER OF EXCELLENCE
1 KARKER STREET
FORT BENNING GEORGIA 31905-5000

REPLY TO
ATTENTION OF

IMBE-MWN (210)

Policy Memorandum 210-22-10
13 June 2019

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Private Organizations

1. REFERENCES:

- a. DoDI 1000.15 (Private Organizations on DoD Installations), 24 Oct 01.
- b. DoD 5500.7-R (Joint Ethics Regulation), 17 Nov 11 (with changes 1-7).
- c. DoD Regulation 7000.14-R (Financial Management Regulation), Volume 13, Oct 11.
- d. AR 1-100 (The Army Gift Program), 27 Jul 15.
- e. AR 210-22 (Private Organizations on Department of the Army Installations), 22 Oct 01.
- f. AR 215-1 (Military Morale, Welfare, and Recreation Programs and Nonappropriated Fund Instrumentalities), 24 Sep 10.
- g. AR 405-80 (Management of Title and Granting Use of Real Property), 10 Oct 97.
- h. AR 600-29 (Fund Raising Within the Department of the Army), 7 Jun 10.
- i. AR 608-1 (Army Community Service), 22 Dec 16.
- j. MCoE Policy Memorandum 600-29-14 (Fund Raising Activities on Fort Benning), 12 December 2018.

2. PURPOSE: To set forth, in addition to the provision of AR 210-22 and other laws or regulatory sources, the requirements to operate private organizations (PO) on Fort Benning, Georgia.

3. POLICY:

- a. Private Organizations operating on Fort Benning, Georgia, must comply with all requirements outlined in paragraph 1 above and any other laws or regulatory sources.

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b. The MCoE Commander delegated the Director of Family and Morale, Welfare and Recreation authority to approve requests to establish POs, review and monitor to ensure compliance with regulation and policy.

c. The MCoE Garrison Commander retained PO Fort Benning operating request approval authority.

d. The POs are not Nonappropriated Fund (NAF) Instrumentalities and are not entitled to receive support from NAF.

e. The DA PO endorsement is strictly prohibited by DOD 5500.7-R, Joint Ethics Regulation, 17 Nov 11.

f. A Family Readiness Group (FRG) is an official Army entity, not a PO. Individuals independent of the FRG may establish a PO to support shared goals and objectives. Such a PO may not receive special treatment. To prevent potential conflicts of interest, if such POs are established, PO board members/leaders may not also be FRG leaders. The FRG must remain separate and apart from any PO fundraising effort. Contact the Staff Judge Advocate (SJA) for guidance on the proper relationships between FRGs and POs affiliated with units.

g. The DFMWR will:

(1) Provide guidance to individuals desiring to establish a Fort Benning PO. Request an SJA legal opinion on PO's constitution and bylaws via email. Prepare a PO notification letter permitting them to operate two years on Fort Benning.

(2) Monitor POs operating on Fort Benning to ensure they meet all requirements timely. The PO Coordinator will inspect all POs annually.

(3) Maintain a DFMWR-managed benning.armymwr.com site providing a single source of required documentation and references including regulations, policy memorandums, and PO guides.

(4) Send termination-warning letters to POs who do not timely comply with requirements.

(5) Send revocation letters signed by the GC revoking the PO operating permit and their installation operations for failing to timely comply with requirements.

(6) Suspend PO fund raising activities for 6 months for operating a fundraiser without a permit (1st offense).

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(7) Suspend PO fund raising activities for overdue audits until the PO provides proof that the audit was performed.

(8) Provide copies of suspension, and revocation letters from the GC to the Chief of Staff, the Inspector General (IG), and the associated major subordinate commander (e.g., 198th IN BDE, ARTB).

h. Private Organizations will:

(1) Exist to enhance community activities for Soldiers, Families, and DA civilians.

(2) Provide DFMWR a signed copy of constitution and bylaws and any changes as they occur.

(3) Contact DPW, vernon.e.kennedy2.civ@mail.mil, or sabine.s.ford.civ@mail.mil, 706-545-5977, if PO wants to use government buildings and/or land. The DPW will determine if a real estate lease or license is required. If so, PO will submit a request to them for it. Upon receiving the lease or license, provide DFMWR a copy.

(4) Raise funds only IAW AR 600-29 and MCoE Policy Memorandum 600-29-12.

(5) Provide DFMWR a list of officers including their name, phone number, and e-mail address.

(6) Submit monthly financial reports and bank statements (including zero or negative balances) to DFMWR. Report will include all revenue streams, e.g. gift cards.

(7) Submit meeting minutes as they occur, or at least once a year to DFMWR.

(8) All private organizations with gross annual revenue of \$1,000 or more will complete a financial audit every two (2) years on a specific date. First audits are due on 1 March 2018 for calendar years 2016 and 2017. The next audit due will be 1 March 2020 for calendar years 2018 and 2019, etc.

(9) Organizations will furnish an audit when the PO treasurer changes, regardless of when it falls during the two (2) year audit timeframe. This does not preclude the PO from furnishing DFMWR with audits listed in paragraph above.

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(10) Audits may be conducted by a committee of three (3) PO members who hold no office, or by a qualified auditor.

(11) If PO bank account contains \$500 or more, provide DFMWR proof of Fidelity Bonding Insurance including a copy of policy's declaration page and the insurance premium payment receipt.

i. Private Organizations will not:

(1) Use Soldiers in uniform to support POs, e.g., setting up fund-raiser site, moving resale merchandise from storage to the sell site, guarding resale items, etc.

(2) Deposit FRG funds into the PO checking account.

(3) Duplicate other DFMWR or AAFES activities.

(4) Allow the President or Vice-President to sign negotiable instruments and possess a debit card issued on the organizations checking account. Also, these officers cannot serve as petty cash fund custodians.

j. The Joint Ethics Regulation, DoD 5500.7-R, paragraph 3.2, identifies certain permissible installation PO support if the following circumstances exist as determined by the Garrison Commander or Commanding General and the event is not a membership drive or fundraiser.

(1) Support does not interfere with Fort Benning's mission and in no way detracts from readiness.

(2) Community relations interests, public affairs interests or military training interests are served by the support.

(3) Associating the Army and Fort Benning with the event is appropriate.

(4) The event is of interest and benefit to the local Civilian community or Fort Benning.

(5) Fort Benning is able and willing to provide the same support to comparable events, sponsored by other similar POs.

(6) The support is not prohibited by other laws or statutes.

(7) No admission fee (beyond that required to pay event sponsoring costs) is charged for the event or for the portion of the event sponsored by Fort Benning.

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k. Certain activities conducted during PO-sponsored events are permissible only when monitored/conducted by DFMWR.

(1) The POs may not dispense or sell alcoholic beverages during events. Army Regulation 215-1 prohibits POs from selling or dispensing alcohol.

(2) The POs may not seek commercial sponsorship. The DFMWR is only authorized organization that can. Military units and government organizations on post may not solicit donations of goods, money, or services from commercial sources including Commissary and other on-post resources for any reason (DoD 5500.7, AR 1-101, and AR 215-1).

4. The POs are included as a Staff Inspection Program (SIP) functional area. The PO/Fund Raising Coordinator will inspect POs during the SIP and all others, at least once a year to ensure compliance with regulation and policies. The PO Fund Raising Coordinator reports inspection results to the major subordinate commander and also integrates results into the DFMWR PO Management Control Program checklist.

5. SUPERSESSION: This policy memorandum supersedes MCoE Policy Memorandum 210-22-8, 21 December 2017.

6. PROPONENT: The PO Coordinator, Support Management Division, DFMWR, 706-545-7041.

FOR THE COMMANDER:



MATTHEW SCALIA
COL, IN
Garrison Commander

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