DEPARTMENT OF THE ARMY



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

IMBE-MWN (600)

Policy Memorandum 600-29-13 15 December 2017

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Fund Raising Activities on Fort Benning

1. REFERENCES:

- a. DoD 5500.7-R (Joint Ethics Regulation, (with changes 1-7), 17 Nov 11.
- b. AR 210-22 (Private Organizations on Department of the Army Installations), 22 Oct 01.
- c. AR 215-1 (Military Morale, Welfare and Recreation Programs and Nonappropriated Fund Instrumentalities), 24 Sep 10.
 - d. AR 600-29 (Fund Raising Within the Department of the Army), 7 Jun 10.
 - e. AR 608-1 (Army Community Service), 22 Dec 16.
 - f. MCoE Policy Memorandum 210-22-2 (Private Organizations), 25 Apr 16.
- g. Official Code of Georgia 16-12-22. 1 (Raffles Operated by Nonprofit, Tax-exempt Organizations).
- PURPOSE: To provide requirements to conduct fund-raising activities on Fort Benning.

3. POLICY:

- a. Fund-raiser requests require prior Directorate of Family and Morale, Welfare and Recreation (DFMWR) approval except the Combined Federal Campaign conducted in the fall and the Army Emergency Relief Fund Campaign in the spring. Generally, an activity raising funds is an officially authorized PO or a Family Readiness Group (FRG). POs and FRGs must have a copy of their DFMWR fund-raising approval letter on hand when conducting their events.
- b. Official Government entities such as unit companies and government offices may not engage in fund-raising activities.
- c. After the DFMWR and specific site manager approvals are obtained, fund-raising may be conducted in, but not limited to, the following installation areas:

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- (1) Sand Hill Army Air Force Exchange Services (AAFES) facilities.
- (2) Mini-mall AAFES facilities.
- (3) On the front sidewalk outside the Main Mall AAFES facility.
- (4) Kelley Hill AAFES facilities.
- (5) Harmony Church AAFES facilities.
- (6) Doughboy Stadium, French Field, and other sports fields when conducting sporting events.
 - (7) Fort Benning Schools (School Clubs and Parent Teacher Organizations only).
 - (8) Family and Morale, Welfare and Recreation facilities.
 - (9) Martin Army Community Hospital public areas.
 - (10) Commissary.
 - (11) Freedom Hall.
- d. Private organizations found violating fund-raising policies may result in future fund-raising requests denials or installation permit suspension/revocation by the GC. The DFMWR will provide suspension/revocation letter copy to the Chief of Staff and associated unit commander. If a PO conducts a fund-raiser without DFMWR approval, the penalty for the first offense is a 6-month suspension. If the second offense occurs within a 12-month period, the GC will suspend the PO's operating permit. A POs fund-raising activities will be suspended for overdue audits, and won't be restored until the PO provides DFMWR proof that an audit was performed.
- e. Youth Services' cheerleading squads/sports teams may raise funds for a team banquet and trophies. Funds raised is limited to \$25 per individual (players, coach, and team parent). The team's head coach will submit a financial statement to the Youth Sports Director for approval no later than 1600 the first Wed following each team's last game of the season.
- f. Fund-raising activities will not duplicate services AAFES or DFMWR provides, i.e., T-shirts, car washes unless AAFES and/or the DFMWR, as appropriate, concur.
- g. Veterans organizations are the only off-post organizations permitted to conduct fundraisers on Fort Benning. They may request approval to exchange poppies or similar tokens for donations no more than two consecutive days a year (AR 600-29).

- h. Private organizations and FRGs are limited to no more than 8 fund-raisers in a calendar year beginning 1 Jan. On-post DOD schools may conduct more than 8 when conducted within their schools. However, when conducting fund-raisers outside school limits, DoD schools fall under the same fund-raising limit. Private organizations and FRGs providing a service to the community or Family members (e.g. for unit graduations) may request an exception. Written request justifying the exception must be approved by the DFMWR.
- i. Only MWR Tickets and Travel may sell tickets on-post to off-post commercial events. With advance authorization Boy and Girl Scouts and POs may sell tickets on post to their own organization's off-post activities. For FRGs, see paragraph 3(I).
 - j. Door-to-door fund-raising is prohibited.
- k. Raffles are prohibited as fund-raisers on Fort Benning; however, the GC may grant an exception based on extenuating circumstances and Staff Judge Advocate's legal opinion. The POs must submit exception to policy requests through the DFMWR to the GC. The requests must include:
- (1) A copy of the PO's 501(c) status from the Internal Revenue Service. The PO must have maintained 501(c) status for at least 2 years.
- (2) Justification that includes all the information identified in paragraph 3(I) of this policy memo.
- (3) Proof of incorporation by either the State of Georgia or the State of Alabama that the PO is authorized to operate in either state.
- (4) Documentation regarding State of Georgia laws and local County Sheriff's requirements (AR 215-1).
- I. An FRG may officially fund-raise from its own community members or dependents. Fund-raising must be in the unit area, for the organization's informal fund, as opposed to a private charity, a particular military member, or a similar cause, and have the unit commander's approval. In some instances, an FRG may benefit people outside its membership in which case the DFMWR may grant the FRG an exception to fund-raise in those areas. The FRG must submit a written request for exception along with a justification. The FRG will refer to its SOP, approved by the commander, for guidance on raising and expending funds. Commanders will consult with their SJA to ensure compliance with regulations and policies and to avoid conflicts with other authorized fund-raising activities before the FRG submits a written request to the DFMWR. FRGs are prohibited from conducting fund-raising activities outside Fort Benning.
- 4. Provide fund-raising requests to DFMWR no less than 14 working days before the event. Private organizations must not use official Army letterhead stationery to type the requests. Family Readiness Groups must use the company letterhead on all their fundraising

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requests. You may e-mail requests to <u>Jenelle.e.oliver.naf@mail.mil</u> or hand carry to her at Support Management Division, DFMWR, Building 228, 7370 Kilgore Street, between 0800 and 1630. Include the following information in requests:

- a. Name of organization requesting to raise funds,
- b. Purpose of fund-raiser.
- c. Date, time, and specific location (specify name and phone number of individual who approved the location for the fund-raiser).
 - d. Description of fund-raiser.
- e. Statement the PO or FRG will deposit funds raised into its account and show the income as a separate line entry on the PO's financial statement provided to DFMWR.
 - f. Name, address, and phone number of the PO's point of contact.
- 5. The DFMWR PO/Fund-Raising Coordinator will inspect POs and their fund-raising activities, i.e., meeting minutes, financial statements, bank statements, permits to operate, annually to ensure compliance with regulations and policies.
- 6. Private organizations and their fund-raising activities will be included as a Staff Inspection Program (SIP) functional area. During the unit SIP, DFMWR PO Coordinator/Fund-Raising Coordinator will inspect the POs operating in unit areas for compliance with regulations and policies at least once a year. The PO Coordinator/Fund-Raising Coordinator reports SIP results to the major subordinate commander and integrates results into DFMWR's Management Control Program.
- 7. SUPERSESSION: This policy memorandum supersedes MCoE Policy Memorandum, 600-29-12, same subject, 26 Oct 15.
- 8. PROPONENT: Jenelle E. Oliver, PO/Fund-Raising Coordinator, Support Management Division, DFMWR, 706-545-7041, <u>Jenelle.e.oliver.naf@mail.mil</u>

FOR THE COMMANDER:

CLINTON W. COX COL, IN Garrison Commander

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