



REPLY TO
ATTENTION OF

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

Policy Memorandum 600-29-12

26 OCT 2015

IMBE-MWN (600-29)

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, 1 Jun 10.
- e. AR 608-1, Army Community Service Center (Chapter 4 and Appendix J), 19 Sep 07 and RAR 001, 12 Mar 13.
- f. MCoE Policy Memorandum 210-22-15, Private Organizations, 26 Oct 15.
- g. Official Code of Georgia 16-12-22.1, Raffles operated by nonprofit, tax-exempt organizations.

2. PURPOSE: To set forth, in addition to provisions of AR 600-29 and other laws or regulatory sources, the requirements for fund raising on Fort Benning, Georgia.

3. POLICY:

- a. This policy memorandum applies to fund raising activity on Fort Benning, Georgia, which must comply with the requirements of AR 600-29, referenced in paragraph 1, and any other laws or regulatory sources.
- b. Except as otherwise provided in this memorandum, fund-raising activities on Fort Benning require Directorate of Family and Morale, Welfare and Recreation (DFMWR) prior written permission. An activity raising funds, as a general rule, will be an officially authorized private organization (PO) or a Family Readiness Group (FRG). For PO fund-raising violations, see paragraph 3(o) below. For FRGs, see paragraph 3(p).

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c. Official Government entities such as unit companies and government offices may not engage in fund-raising activities other than the Combined Federal Campaign (fall) and the Army Emergency Relief Campaign (spring).

d. After the DFMWR and specific site manager approvals are obtained, fund-raising may be conducted in, but not limited to, any of the following areas on the installation:

(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) Personal quarters.

(9) Family and Morale, Welfare and Recreation facilities.

(10) Martin Army Community Hospital public areas.

(11) Commissary.

(12) Freedom Hall.

e. Fund-raiser requests, for areas other than those mentioned in paragraph 3(d) above, will be considered and must be forwarded to the DFMWR for consideration and approval.

f. Private organizations and FRGs must clearly display their fund-raising permit during fund-raising events. The DFMWR will suspend a PO's permit to operate for conducting a fund-raiser without obtaining written approval. The first offense penalty is a 6 months suspension. If a second offense occurs within a 12-month period, DFMWR will revoke the PO's installation permit to operate.

g. A PO's fund-raising activities will also be suspended for overdue audits and will not be restored until the PO provides proof that an audit has been performed.

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h. Youth Services' cheerleading squads and sports teams may raise funds for a team banquet and trophies. The funds raised are 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 on the first Wednesday following each team's last game of the season.

i. Fund-raising activities will not duplicate services provided by AAFES or DFMWR activities (i.e., T-shirt sales, car washes) unless AAFES and/or the DFMWR, as appropriate, pre-approve the fund-raiser.

j. Off-post organizations may not raise funds on Fort Benning. An exception is veterans' organizations, which may request approval to conduct sales of "poppies" or similar tokens no more than two consecutive days per year (AR 600-29).

k. Private organizations and FRGs are limited to "occasional" fund-raising within a 12-month period. Occasional is defined as no more than eight (8) fund-raisers in a calendar year, beginning 1 January each year. On post DoD schools may conduct more than the "occasional" fund-raising annually, when conducted within their schools. However, when conducting fund-raisers outside the school limits, DoD schools then fall under the same "occasional" 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 to exceed the number of "occasional" fund-raisers. Written request and justification for an exception to the eight event fund-raising limit must be submitted to the DFMWR for approval.

l. Only MWR Tickets and Travel may sell tickets on-post to off-post commercial events. With advance authorization, per paragraph 4 below, Boy and Girl Scouts and POs may sell tickets on-post to their own organizations' off-post activities. For FRGs, see paragraph 3(p) below.

m. Door-to-door fund-raising is not allowed except that officials may, pursuant to above paragraph 3.e. permit exceptions for the following groups:

- (1) Boy and Girl Scouts.
- (2) Youth Services' sports teams.
- (3) Fort Benning Schools' Parent Teacher Organization/Booster Clubs.

n. Raffles are prohibited as fund-raisers on Fort Benning; however, the Garrison Commander may grant an exception to this rule based on extenuating circumstances, Office of the Staff Judge Advocate (SJA) legal review, and risk assessment. The POs must submit requests to the DFMWR for forwarding to the Garrison Commander. The DFMWR will consult with the PO regarding State of Georgia laws and local County Sheriff's requirements. The request for exception must include:

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(1) A copy of the PO's 501(c) status from the Internal Revenue Service. The PO must also have maintained 501(c) status for a period of at least 2 years.

(2) An exception to the policy justification statement that includes all the information identified in paragraph 4 below.

(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.

o. Pursuant to MCoE Policy Memorandum 210-22-12, Private Organizations, violating this policy's provisions may result in denial of future requests to raise funds or suspension/revocation of a PO's installation permit. The Garrison Commander will suspend/revoke all PO permits to operate and a DFMWR will provide a copy of all suspensions/revocation letters to the Chief of Staff and the associated unit commander.

p. Family Readiness Groups 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 unit commander approval. In some instances, an FRG may benefit persons outside of 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 and 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 all conflicts with other authorized fund-raising activities prior to the FRG submitting a written request to the DFMWR. The RGs are prohibited from conducting fund raising activities outside of Fort Benning. Prior written permission is required from DFMWR for all fund-raising events.

4. Requests to fund-raise should be forwarded, no less than 14 working days prior to the event, to DFMWR, MCoE, ATTN: IMBE-MW. Requests may be hand carried to DFMWR, NAF Synchronization Cell, Building 128 (2nd Floor), between 0800 and 1630, or e-mailed to Margaret.w.pope.naf@mail.mil. All requests must include the following:

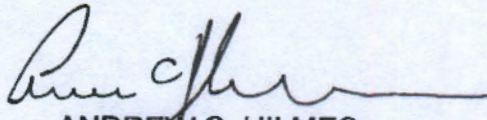
- a. Name of organization requesting to raise funds,
- b. Purpose of the fund-raising activity.
- c. Date, time, and specific location (specify the name and phone number of the individual who approved the fund-raising location).
- d. Description of fund-raising activity involved.
- e. Statement that PO will deposit funds raised into their account and show the income as a separate line entry on the PO's financial statement provided to DFMWR.

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- f. Name, address, and telephone number of the PO's point of contact.
- 5. The DFMWR will inspect private organizations and their fund-raising activities annually to ensure regulation and policy compliance.
- 6. Private organizations and their fund-raising activities will be included as a Staff Inspection Program (SIP) functional area. During the unit SIP, DFMWR employees will inspect the private organizations operating in unit areas for compliance with regulations and policies at least once a year. The DFMWR reports SIP results to the major subordinate commander and integrates results into DFMWR's management control program for private organizations.
- 7. SUPERSESSION: This policy memorandum supersedes MCoE Policy Memorandum, 600-29-11, 27 Feb 15, same subject.
- 8. PROPONENT: Margaret Pope, Private Organization/Fund-Raising Coordinator, DFMWR, 706-545-6594.

FOR THE COMMANDER:



ANDREW C. HILMES
Colonel, Armor
Garrison Commander

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