



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

Policy Memorandum 600-29-2

AMIM-BEW (210)

JAN 26 2022

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Fund-Raising Activities on Fort Benning

1. REFERENCES:

- a. DoD 5500.7-R, Joint Ethics Regulation
- b. AR 210-22, Private Organizations on Department of the Army Installations
- c. AR 215-1, Military Morale, Welfare and Recreation Programs and Nonappropriated Fund Instrumentalities
- d. AR 600-29, Fund Raising Within the Department of the Army
- e. AR 608-1, Army Community Service
- f. Army Directive 2019-17, Changes to the Soldier and Family Readiness Group Program
- g. MCoE Policy Memorandum 210-22-10, Private Organizations
- h. Official Code of Georgia Annotated 16-12-22.1, Raffles Operated by Nonprofit, Tax-exempt Organizations, 2010
- i. AR 100-1, The Army Gift Program
- j. The Villages of Benning Resident Responsibility Guide¹⁹

2. PURPOSE: To provide requirements to conduct fund-raising activities on Fort Benning.

3. POLICY:

a. Generally, fund-raising requests require prior Directorate of Family and Morale, Welfare and Recreation (DFMWR) approval except for 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 Private

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Organization (PO) or a Soldier and Family Readiness Group (SFRG).

b. Soldier and Family Readiness Group fund-raising requests will be approved at the battalion level (or equivalent), after consultation with the Staff Judge Advocate. A copy of the approval (memorandum or email) will be forwarded to the DFMWR to monitor/avoid simultaneous fundraisers by SFRGs and POs at the same location. By exception, off-post fund-raising may occur with the approval of the GC after consultation with the Staff Judge Advocate (SJA). Fund-raising for Reserve Component SFRGs is authorized proximal to the armory or readiness center or within the local community after consultation with the SJA and upon approval by the O-6 commander in the chain of command.

c. Private Organizations and SFRGs must have a copy of their approval letter on hand when conducting their events.

d. Official Government entities such as unit companies and government offices may not engage in fund-raising activities.

e. Fund-raising is prohibited in the workplace because it tends to disrupt work. Fund-raising may be conducted in the following areas upon approval of specific site manager or custodian.

- (1) Sand Hill Army & Air Force Exchange Service (AAFES) facilities
- (2) Mini-mall AAFES facilities
- (3) Front sidewalk of 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

(12) Outside between McGinnis-Wickam Hall and Building 70

(13) Airborne Walk

f. Private organizations found violating fund-raising policies may result in future fund-raising requests disapproval 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 PO's 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.

g. 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 Wednesday following each team's last game of the season.

h. 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.

i. Veteran 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).

j. Private organizations and SFRGs are limited to no more than 12 fundraisers in a calendar year beginning 1 January. On-post DOD schools may conduct more than 12 when conducted within their schools. However, when conducting fundraisers outside school limits, DoD schools fall under the same fund-raising limit. Private organizations 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.

k. 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.

l. Door-to-door fund-raising is prohibited.

m. Raffles are prohibited as fundraisers 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:

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(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 as to why the PO be granted an exception to policy.

n. Raffles conducted off-post must comply with Official Code of Georgia Annotated 16-12-22.1 (Raffles Operated by Nonprofit, Tax-exempt Organizations) requirements.

o. Soldier and Family Readiness Groups may not engage in external fund-raising with commercial or private entities and may not solicit gifts and donations. However, in accordance with reference 1i and with the advice of an ethics counselor, commanders may, in response to an appropriate inquiry, inform potential donors of the needs of the Army in relation to assisting Army Families. Additionally, they may not enter into commercial sponsorship agreements. Commercial sponsorship is an agreed upon arrangement under which a business provides assistance, funding, goods, equipment or services in exchange for public recognition or other promotional opportunities on the installation.

4. Provide PO 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. Soldier and Family Readiness Groups must use the company letterhead on all their fund-raising requests. You may call the PO/Fund-raising Coordinator at 706-545-3485 for the email address to send the request to or hand-carry to him/her at Support Management Division, DFMWR, Building 85, 6850 Barron Avenue, 0800 to 1700. Include the following information:

- a. Name of organization requesting to raise funds
- b. Purpose of fundraiser
- c. Date, time, and specific location (specify name and phone number of individual who approved the location for the fundraiser)
- d. Description of fundraise
- e. Statement the PO or SFRG 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.

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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/Fund-Raising Coordinator will inspect the POs operating in unit areas for compliance with regulations and policies biennially. The PO/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 600-29-1, same subject, 6 Nov 20.

8. PROPONENT: PO/Fund-Raising Coordinator, DFMWR HQs, 706-545-3485.

FOR THE COMMANDER:

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COL, AR
Garrison Commander

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