

FORT GORDON FUNDRAISING GUIDE

7 June 2012

This Fundraising Guide is incorporated as referenced by Garrison Commander Policy Memorandum No. 17, On-Post Fundraising. If you have any questions about fundraising, call the Directorate of Family and Morale, Welfare and Recreation, NAF Support Services Division, 706-791-2611/2012.

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1. AR 608-1, Army Community Service, Appendix J, Family Readiness Groups (Page 8).
2. Information Paper, ATZH-JA (23 Feb 09), Family Readiness Groups and Fundraising (Page 21).
3. Establishing an SOP for an FRG Informal Fund (Page 26).
4. TRADOC Regulation 350-6, paragraph 2-6i (Page 29).
5. References (Page 30).

1. Applicability.

a. This guide applies to all military organizations, private organizations, informal funds, and other activities operating on Fort Gordon. This guide is not applicable to special events conducted by the Family and Morale, Welfare and Recreation Fund. However, this guide covers fundraisers to raise funds for Nonappropriated Fund supplemental missions, such as Christmas House, unless excepted by paragraph 4, Informal Funds.

b. This guide provides one source for general guidance on local fundraising. This policy is intended to provide consistent and relatively simple guidelines for the approval and conduct of fundraising activity on the Fort Gordon military reservation. It is intended to govern the privilege of fundraising in such a manner that worthy causes can be supported and disruption of installation operations can be minimized. The information in this guide is intended for private organizations (AR 210-22) and informal funds (AR 600-20).

c. Fundraising by off-post organizations and activities is governed by AR 600-29, DoD 5500.7-R, Joint Ethics Regulation § (section) 3-211, and other regulations.

2. Definitions.

a. "Fundraising" is any activity conducted for the purpose of collecting money, goods, or other support for the benefit of others, to include fundraising for MWR Supplemental Mission accounts, such as Christmas House.

b. "In the workplace" is that area within federal property that employees use for the performance of normal mission functions. Examples include offices, conference rooms, medical treatment facilities, and other locations where employees perform their normal duties. Not included within this definition are areas that are generally not used for the performance of normal duties. Examples include public lobbies, parking lots, picnic areas, break rooms, break areas, and other locations that employees do not use for the performance of normal duties.

c. A "private organization" (PO) is a self-sustaining non-Federal entity, which is operated on a DoD installation with the consent of the Garrison Commander by individuals acting exclusively outside the scope of their official duties.

d. "Morale, Welfare, and Recreation (MWR) activities" are official mission activities of the installation's MWR program. MWR activities are not private organizations.

e. "Supplemental mission funds" are NAF funds generated from the operation of specific and unique situations that occur in support of non-MWR installation programs. Supplemental mission accounts within the IMWRF are established to administer these funds, which are used to support the specific program or account for which the fund was established. Examples include Christmas House and the Better Opportunities for Single Servicemembers program.

f. An “informal fund” is a fund of limited scope established by individuals within an organization. Examples of informal funds are office coffee funds, cup and flower funds, and annual picnic funds. Informal funds are authorized by AR 600-20, paragraph 4-21. Traditionally, they have not been used as a tool to fundraise—rather, they have most often simply accepted dues or other contributions from members. Informal funds may, however, receive moneys collected through more traditional fundraising projects, but such fundraising projects may only be conducted on post. Furthermore, informal funds may not solicit off post with appropriate approval.

3. Prohibited Fundraising.

a. As an institution, the Army does not fundraise. Army units do not solicit for funds, goods, or services. Private organizations and informal funds are the only organizations that are authorized to fundraise on Fort Gordon.

b. Except for raffles conducted by the MWR program in accordance with AR 215-1, games of chance, such as raffles, lotteries, or other gambling-types of activities, are prohibited.

c. Fundraisers cannot duplicate services provided by the MWR program or AAFES or otherwise compete with MWR or AAFES unless they first obtain explicit written approval from AAFES or the Director of FMWR, as appropriate for the particular activity.

d. Working on a fundraiser while on duty is generally a misuse of government resources. As an exception, supervisors may authorize personnel to use brief periods of time during the duty day for fundraising activities, such as coordinating with MWR or conducting a planning meeting. These activities must be infrequent and of short duration and may not adversely affect the performance of the mission.

e. The Public Affairs Office may and is encouraged to distribute information about events of significant interest to the Fort Gordon community.

f. Personnel may voluntarily participate in activities of non-federal entities as individuals in their personal capacities, provided they act exclusively outside the scope of their official positions.

g. Supervisors will not solicit subordinates to donate to a particular fundraising event. Also see the special rules that apply to AIT/IET personnel, TRADOC Regulation 350-6, paragraph 3-45 (Appendix 4).

h. Special favors for donations are prohibited. For example, personnel who donate will not be excused from PT, be given a pass, or excused from wearing the appropriate military uniform.

4. Informal Funds.

a. If fundraising within their own organizations, informal fund managers are not required to seek advance approval for fundraisers. See paragraph 5. For the purpose of this guide, an “organization” is defined as a brigade or similarly situated unit. Funds collected in the form of dues or other collections will be used for expenses consistent with the purposes and function of the informal fund. Collection of dues is not fundraising. Commanders are responsible for monitoring the activities of any informal funds operating within their organizations. Fundraising outside the organization area requires Garrison Commander approval. See paragraph 5.

b. Informal funds established to support Family Readiness Groups.

(1) In August 2005, the Department of the Army declared that Family Readiness Groups (FRGs) are solely official command programs. As such, commanders are responsible for their operation and funding through appropriated funds. Because FRGs are now considered solely an official command program, their ability to fundraise is significantly limited. In August 2006, the Army published FRG guidance in AR 608-1, Army Community Service, Appendix J. See Appendix 1.

(2) Commanders may, however, establish informal funds to support the unofficial activities of FRG members. FRGs may fundraise on behalf of their informal fund outside their own organization (but on post only and not “in the workplace”). “In the workplace” does not include unit-exclusive parking lots, primary lobbies, and corridors of buildings that are as far removed from individual work areas as possible. The procedure for establishing such an informal fund is described in Appendix 3, establishing an SOP for an FRG Informal Fund.

(3) Commanders may authorize the FRGs to fundraise on behalf of its informal fund inside the commander’s own organization with no additional approvals.

(4) Off-post solicitation on behalf of informal funds is prohibited. (Private organizations, such as FEW and Spouses Club, may fundraise off-post. Private organization members may fundraise in their private, personal capacities only. They may never fundraise using government letterhead, official titles, or official government communications systems.)

(5) For more information about Informal Funds, see Appendix 2, Information Paper, Family Readiness Groups and Fundraising, ATZH-JA, 20 January 2006.

5. Requests to conduct fundraisers.

a. As noted in paragraph 4b, above, commanders may approve fundraisers within their unit areas conducted by informal funds established to support FRGs. All other requests must be submitted in writing at 10 work days in advance to the Directorate of Family and Morale, Welfare and Recreation, NAF Support Services Division, (IMGO-MWN), Darling Hall, Room 260. No particular form is required. An electronic mail request is acceptable

(patricia.s.camacho2.naf@mail.mil). Telephone requests will not be accepted. For information, call Ms. Patricia Camacho, 706-791-2611/2012. The request must include:

- (1) Identity of the sponsoring organization;
- (2) Description of the fundraising activity;
- (3) Description of the purpose of the fundraiser;
- (4) The proposed date(s) and locations;
- (5) Statement that participants are volunteers, that they will not be in uniform, and that they will not be on duty when conducting the fundraiser;
- (6) Statement that the requester has coordinated the date and location with the senior official in charge of that location; and
- (7) The point of contact.

b. Except as noted in paragraph 7g below, fundraising in the federal workplace is generally prohibited.

6. Fundraising activities during the annual periods of the Combined Federal Campaign (CFC) and the service relief fund campaigns. (The “service relief funds” are the Army Emergency Relief Fund, the Navy-Marine Corps Relief Society, and the Air Force Assistance Fund.)

a. During the CFC and the annual campaigns for the service relief funds, fundraising events that support CFC and the service relief funds receive priority. Informal funds and private organizations may conduct fundraisers if they do not detract from the CFC or the service relief fund campaigns. For these service relief campaigns, solicitation of military and civilian personnel in the workplace is authorized, as are approved special events for the benefit of these campaigns, such as bake sales, carnivals, athletic events, car washes, and races.

b. Special events for CFC or the service relief funds will be conducted only during the annual campaign periods of the CFC and the service relief funds. All proceeds must be donated to the CFC or the applicable service relief fund.

c. Battalion/Troop Command or higher-level units may each conduct one special event per year in support of the CFC and one special event per year in support the applicable service relief fund campaign. Subordinate units below Battalion/Troop Command level may also conduct one special event, but their fundraising activities must be coordinated and monitored by the Battalion/Troop Command level. Directorates and other organizations may each conduct one special event per year in support of the CFC and one special event per year in support of the applicable service relief fund campaign (for example, MEDCOM SE Contracting Office, Fort Gordon Resident Agency (CID), or Defense Military Pay Office).

d. The organizations described at 6c above may also each conduct one fundraiser per year for an MWR Supplemental Mission fund, such as Christmas House. These fundraisers must not detract from the CFC or the service relief fund campaigns.

e. Organizers will submit requests in accordance with paragraph 6.

f. In all approved special fundraising events for the CFC, the donor must have the option of designating contributions to a specific participating organization or federation or be advised that the donation will be counted as an undesignated contribution and distributed in accordance with CFC policies.

g. Donations are strictly voluntary for any kind of fundraising. No special favors, privileges, or entitlements, such as special passes, civilian clothes day, or leave privileges as inducements to contribute, are authorized.

7. Fund-raising outside of the campaign periods of the CFC and the service relief funds.

a. Private organizations desiring to conduct fundraisers outside of the unit area may conduct no more than four fundraisers on the installation during any calendar year. Family Readiness Groups Informal Funds have no restriction to the number of fundraising conducted

b. Continuing resale activities (e.g., the Thrift Shop) are not authorized unless approved by the Garrison Commander or authorized by applicable regulations.

c. Use of official mail distribution or electronic mail systems for PO fundraising is not authorized.

d. Any logistical support for PO fundraising events must be in accordance with the Joint Ethics Regulations § 3-211: (1) Support will not interfere with performance of official duties or detract from readiness; (2) Community relations with the local community are served; (3) It is appropriate to associate Fort Gordon with the event; (4) The fundraiser is of interest and benefit to the local civilian community or Fort Gordon; and (5) Fort Gordon is willing to provide the same support to fundraisers sponsored by other similar PO's. The Garrison Commander (DPTMS) and Brigade Commanders are the approval authorities for logistic support.

e. PAO is authorized and encouraged to publicize fundraising events of general interest to the Fort Gordon community.

8. Official Endorsement. The following fundraising events may be officially endorsed: Combined Federal Campaign; Army Emergency Relief; Navy-Marines Corps Relief Society; Air Force Assistance Fund; MWR; and other organizations:

- a. Composed primarily of DoD employees or their dependents;
- b. When fundraising among their own members;
- c. For the benefit of the welfare funds for their own members or their dependents;
- d. When approved by the commander/director.

For example: an informal fund of a Family Readiness Group. Private organization fundraisers, such as AUSA or AFCEA fundraisers, do not receive official endorsement, but PAO may announce private organization fundraisers that may be of interest to Fort Gordon personnel.

9. Chaplain fundraising is governed by AR 165-1, paragraph 14-8, and by AR 600-29, paragraph 1-5. Fundraising by religious organizations or their affiliates is authorized only in conjunction with religious services and must be conducted in accordance with AR 165-1. Prior coordination with the Office of the Staff Judge Advocate is required.

10. Exception. A request for an exception to this policy must be submitted in writing to the Garrison Commander, ATTN: IMG0-ZA.

11. References. See Appendix 5.

Appendix 1

AR 608-1, Army Community Service

Appendix J

Army Family Readiness Group Operations

J-1. Concept and purpose

a. The FRG is a unit commander's program formed in accordance with AR 600-20. Normally FRGs will be established at the company level, with battalion and brigade levels playing an important advisory role. FRGs are not a morale, welfare, and recreation program; a NAFI: a private organization; or a nonprofit organization.

b. An FRG is a command-sponsored organization of Soldiers, civilian employees, family members (immediate and extended), and volunteers belonging to a unit. FRGs will provide mutual support and assistance, and a network of communications among the family members, the chain of command, and community resources. FRGs will assist unit commanders in meeting military and personal deployment preparedness and enhance the family readiness of the unit's Soldiers and families. They will also provide feedback to the command on the state of the unit "family".

c. Family readiness is the mutual reinforcement and support provided by the unit to Soldiers, civilian employees, and family members, both immediate and extended.

d. The rear detachment commander is the unit commander's representative at home station while the unit is deployed and is the FRG link to the deployed unit. All logistic support for FRGs (for example, meeting rooms, nontactical vehicle use, office equipment and computers, newsletters, telephones, and volunteer support) is authorized by the rear detachment commander during deployment.

e. The Garrison ACS Center and RC Family Programs Office will assist unit commanders in establishing successful FRGs by providing expertise, classes, training, and support to FRGs and the FRG leadership, as outlined in AR 608-1.

f. Unit commanders will ensure that their FRGs appeal to all service members, civilians, and family members regardless of rank structure or family size, composition, language spoken, and other characteristics. Commanders will seek FRG leaders who are particularly adept at energizing both officer and enlisted corps' families. FRGs that do not reflect their unit's demographics or have a high level of family participation will be reevaluated to address impediments that exist toward creating a balanced and

representational FRG. Typical issues could be FRG meeting times, unmet child care needs, FRG activities that do not match FRG member needs, FRGs that do not provide training programs relevant to FRG family needs, and other family support issues.

J-2. Family readiness group roles and functions

a. The FRG mission is to —

(1) Act as an extension of the unit in providing official, accurate command information.

(2) Provide mutual support between the command and the FRG membership.

(3) Advocate more efficient use of available community resources.

(4) Help families solve problems at the lowest level.

b. The type and scope of FRG mission activities will depend on a number of factors such as —

(1) The Commander's budget for FRG mission activities.

(2) The identified needs of unit Soldiers, civilian employees, and their families.

(3) Command interest and emphasis.

(4) The number of FRG members.

(5) The time, energy, and creativity of FRG membership.

(6) The makeup of the FRG, including the percentages of single Soldiers, number of years Soldiers and their families have served with the military, number of families with young children, and other family composition factors.

(7) The unit's training and deployment schedule.

c. FRGs are official DA programs established pursuant to AR 600-20. FRG mission activities and appropriated fund expenditures are subject to DOD 5500.7-R, DOD 7000.14-R, 31 USC 341, and all other applicable statutory and regulatory restraints on official activities, use of appropriated funds, and fundraising.

d. Certain FRG mission activities are essential and common to all FRGs. They include FRG member meetings, FRG staff and committee meetings, publication and distribution of FRG newsletters, maintenance of updated family rosters and family

readiness information, establishment of FRG member telephone trees and e-mail distribution lists, and scheduling educational briefings for FRG members. FRG activity level can vary depending on unit mission and on whether the unit is in pre- or postdeployment, deployed, or in a training/sustainment period at the home station.

e. FRG social activities can enhance family and Soldier camaraderie, provide stress relief, and reduce family loneliness during deployments. Social activities will not be funded using appropriated funds. FRG members may use money contained in an FRG informal fund to pay for social activities described in paragraph J-7.

J-3. Resources

FRG mission-essential activities are supported using the unit's appropriated funds, excluding BA11/OPTempo. FRG mission-essential activities authorized appropriated fund support may not be supported with NAFs. FRG mission-essential activities may not be augmented with private money. Such augmentation may be a violation of 31 USC 1345. FRG appropriated fund resources may not be used to support private organization activities, internal fundraisers, or commercial ventures.

a. Government office space and equipment. FRGs may use Government office space, computer and office equipment, faxes, e-mails, scanners, and so on to support the FRG mission.

b. Paper and printing. FRGs may use Government paper and printing supplies to publish FRG newsletters to relay information from the command and to support any FRG mission activity. Commanders will decide how frequently newsletters will be published. Each unit will have a standard operating procedure (SOP) on the preparation, printing, and distribution of FRG newsletters. FRG newsletters may be distributed by the Army or installation post office or via e-mail to FRG members.

c. Army and installation post offices and official mail. FRGs are authorized to use official mail for official, mission-related purposes and as approved by the unit commander.

(1) Unofficial information may be included in an official FRG newsletter, provided: it does not exceed 20 percent of the printed space used for official information; it does not increase printing and mailing costs to the Government; and it does not include personal wanted/for sale advertisements. The FRG newsletter must state whether it contains only official information or both official and unofficial information.

(2) If the newsletter contains both types of information, it will include the following statement: "The inclusion of some unofficial information in this FRG newsletter has not increased the costs to the Government, in accordance with DOD 4525.8-M."

d. Government vehicles. In accordance with AR 58-1, the unit commander may authorize Government vehicle use in support of official FRG activities, including the transportation of FRG members for FRG mission-related activities. Government vehicles may be used to support official FRG activities when —

(1) The appropriate commander determines that the use of the vehicle is for official purposes and that failure to provide such support would have an adverse effect on the FRG mission.

(2) The driver has a valid and current license to operate the vehicle and all other regulatory requirements regarding the use of the Government vehicle have been followed.

(3) The use of the vehicle can be provided without detriment to the accomplishment of the unit's mission.

e. Child care. Depending on availability of funds, unit commanders may authorize appropriated funds for —

(1) Childcare for command-sponsored training in accordance with AR 608-10, paragraphs 3-2 and 3-4.

(2) Needed family support, including child care, education, and other youth services for Armed Forces members who are assigned to duty or ordered to active duty in conjunction with a contingency operation (see 10 USC 1788(b), DODD 1342.17, and DODI 1342.22).

f. Statutory volunteers. The unit commander may accept statutory volunteer labor to support the FRG mission, as described in paragraph J-4 and in accordance with this regulation. However, FRG volunteers are not considered statutory volunteers when they are participating in social or fundraising activities and are not entitled to reimbursement for incidental expenses during this period of time.

J-4. Volunteers

a. Volunteers. The Soldier and Family Readiness System relies heavily on the support of a professional volunteer cadre. Unit commanders may staff their FRGs with volunteers, as provided in chapter 5 of this regulation and in accordance with 10 USC 1588.

(1) FRG volunteers in leadership and key roles, such as the FRG leader, treasurer, key caller, and welcome committee chair, must in-process through the local ACS Center for the Active Component or through the RC Family Programs Office. Commanders will ensure their volunteers are supervised in the same manner as an employee, that they have a position description, and that they have followed all other

legal and regulatory requirements in accordance with chapter 5 of this regulation and 10 USC 1588.

(2) The local ACS center, RC Family Programs Office, or Army Volunteer Corps Coordinator (AVCC) will provide unit commanders or their designees with expert guidance on the Army Volunteer Corps Program. They will provide commanders with standard FRG volunteer position descriptions and answer volunteer questions. The unit commander will ensure that the AVCC is provided the FRG volunteers' work hours monthly to track volunteerism within their areas of responsibility and for volunteer recognition purposes.

(3) FRG volunteers are authorized to use Government facilities to accomplish their assigned duties. This includes the use of office and meeting spaces; telephone, computer, e-mail, and copying equipment; administrative supplies; administrative and logistical support; and additional equipment. Government computer use, including e-mail and internet use, is authorized for official FRG business only.

(4) To support official FRG activities, FRG volunteers may operate Government-owned or -leased nontactical vehicles with a gross vehicle weight of less than 5,000 pounds, provided they meet the licensing requirements set forth in AR 600-55.

(a) The authorization to drive a Government-owned or -leased nontactical vehicle will be included in the volunteer's position description.

(b) Vehicular accidents occurring while an FRG volunteer is operating a Government vehicle must be reported in accordance with AR 385-40.

b. Funding for volunteer support. Appropriated funds may be used to support FRG volunteers, with command preapproval and funding availability. Appropriated funds for volunteer support may be used for —

(1) Training and travel expenses. Commanders may, at their discretion, authorize payment for travel and training of official statutory volunteers.

(a) Authorized FRG volunteer travel may include FRG volunteer visits to geographically dispersed members of the FRG in direct support of the FRG mission.

(b) Enrollment, travel, per diem, and other expenses may be funded for training to improve FRG volunteers' effectiveness or enable them to accept positions of increased responsibilities. Invitational travel orders are authorized, pursuant to the JFTR, appendix E, part I, paragraph A, and Secretary of the Army travel policy. Funding will depend on command preapproval and availability of funds.

(2) Reimbursement of incidental expenses. Unit commanders may budget for the reimbursement of official volunteer incidental expenses using appropriated funds for FRG volunteers, as authorized by this regulation and 10 USC 588. Volunteers may be provided reimbursement for incidental expenses (out-of-pocket expenses) such as child care, long-distance telephone calls, mileage, and other expenses incurred while supporting the FRG official mission, in accordance with chapter 5 of this regulation and DODI 1100.21 and the commander's FRG budget SOP (see paragraph J-6).

(3) Awards, recognition, and mementos. Appropriated funds will not be authorized or available for volunteer awards other than official certificates of recognition or volunteer incentive awards in accordance with AR 672-20. NAFs will be authorized for Garrison volunteer recognition programs, awards, and banquets and to purchase mementos consistent with AR 215-1. Unit commanders will ensure that their FRG volunteers' hours are submitted monthly to the Garrison AVCC and that FRG volunteers are recognized at Garrison community volunteer recognition ceremonies.

c. Commanders may not authorize travel or the reimbursement of volunteer incidental expenses for members of their household or other persons that could present a potential conflict of interest (see DOD 5500.7-R). Commanders will forward these decisions to the next senior level officer within the commander's chain of command for determination. Commanders will seek guidance regarding specific ethics issues from their servicing ethics counselors.

J-5. Family readiness group deployment support assistants/mobilization deployment assistants

In the Active Army, commanders may authorize units to hire FRG deployment assistants who provide unit FRG administrative support services.

a. The FRG deployment assistant will coordinate training through local community resources and provide administrative collaboration between the rear detachment commander and the FRG leader. The FRG deployment assistants will not duplicate services or overlap existing resources in the military community.

b. The FRG deployment assistant works for the unit commander, who will have day-to-day operational direction of the assistant's activities. The duties of the FRG deployment assistant will not conflict with the duties of the volunteer FRG leadership. The FRG deployment assistant will not be involved in FRG informal fundraising activities, casualty assistance procedures, suicide prevention activities, teaching family readiness training, family counseling, or other non-FRG official administrative support duties.

c. The Army National Guard may hire FRG assistants to assist the State Family Program Directors at Joint Force Headquarters, and the US Army Reserve may hire mobilization and deployment assistants to assist the family programs directors at regional readiness commands.

J-6. Budget process

a. FRG operations. These are funded by the unit commander's appropriated funds, excluding BA11/OPTEMPO. Commanders will consider FRG mission activity requirements when planning their yearly budget. FRG budget needs vary widely and are highly dependent on location, the unit's mission and deployment situation, the composition of the FRG membership, and component.

b. FRG budget SOPs. Commanders will approve an SOP that describes the support available for FRG mission activities and the procedures for FRG leaders and volunteers to request support. FRG leaders must be familiar with the SOP. A sample SOP is included in Operation READY training materials.

c. Government purchase card. Commanders will use a Government purchase card to pay for FRG operating expenses, when practicable. For example, commanders may use their Government purchase card to purchase supplies, equipment, room rental, or any other approved item to support official FRG mission activities. The FRG budget SOP will include a requirement that FRG leaders fill out purchase request forms and submit them to the commander for approval. The SOP will also state the procedures for requesting reimbursement for incidental expenses for FRG volunteers.

J-7. Family readiness group informal funds

a. Authorization.

(1) Commanders may authorize their FRG to maintain one informal fund in accordance with AR 600-20. No more than one FRG informal fund per unit may be authorized. Informal funds are private funds generated by FRG members that are used to benefit the FRG membership as a whole. FRG informal funds may not be deposited or mixed with appropriated funds, unit MWR funds, the unit's cup and flower funds, or any individual's personal funds. The expenditure of informal funds will be consistent with Army Values, DOD 5500.7-R, and AR 600-20.

(2) Examples of authorized use of informal funds include FRG newsletters that contain predominantly unofficial information and purely social activities, including, but not limited to, parties; social outings, volunteer recognition (not otherwise funded with APFs), and picnics.

(3) Examples of unauthorized use of FRG informal funds include augmenting the unit's informal funds (the unit's cup and flower funds); purchasing items or services that are authorized be paid for with appropriated funds; purchasing traditional military gifts, such as Soldier farewell gifts that are not related to family readiness; and funding the unit ball.

b. Fund custodian. The unit commander will sign a letter designating a fund custodian (treasurer) and an alternate. The fund custodian and alternate must not be the unit commander, a deployable Soldier, or the FRG leader. The fund custodian is responsible for informal fund custody, accounting, and documentation.

(1) The FRG informal fund custodian and alternate are personally liable for any loss or misuse of funds.

(2) After designation of the informal fund custodian, the custodian may establish a noninterest bearing bank account under the FRG's name (never the individual's name). The commander will authorize opening the account and prepare a letter naming the fund's custodian and alternate as persons authorized to sign checks drawn on the account. The commander will not be a signatory on the account.

(3) The informal fund custodian will provide informal fund reports to the unit commander monthly and as requested. An annual report on the FRG informal fund activity will be provided to the first colonel (O6) commander or designee in the unit's chain of command no later than 30 days after the end of the calendar year. These reports will summarize the informal fund's financial status, to include current balance, total income, and an itemized list of expenditures along with an explanation showing how the expenditures are consistent with the purpose of the FRG informal fund as established in the SOP.

(4) Although not required, commanders may consider requiring the FRG informal fund to be bonded in accordance with the procedures of AR 210-22, paragraph 3-2b.

c. The FRG informal fund SOP. All FRG informal funds will have an SOP. This document memorializes the FRG members' determination of the purpose of the FRG informal fund. The SOP may be a one-page document and must include —

(1) The FRG name.

(2) A description of the FRG's informal fund purpose and functions and a summary of its routine activities. For example, "The FRG's informal fund purpose and function are to provide support and recognition to FRG members during the following life events: births, birthday parties, new member welcome parties, departing member farewell parties, holiday parties, and so on".

(3) The following statement must be included in the FRG informal fund SOP: "This FRG informal fund is for the benefit of the FRG members only and is established exclusively for charitable purposes and to provide support to Soldiers and family members as the Soldiers and families adapt to Army life. It is not a business and is not being run to generate profits. It is not an instrumentality of the United States Government".

(4) The FRG informal fund SOP must be approved by the unit commander and a majority of the FRG members. It will be signed at a minimum by the FRG leader, the fund custodian (treasurer), and the alternate fund custodian. (A sample informal fund SOP is included in Operation READY training materials.)

d. Fundraising for FRG informal funds. DOD 5500.7-R, paragraph 3-210(a)(6), authorizes official fundraising by organizations composed primarily of DOD or DA employees and their dependents when fundraising among their own members or dependants for the benefit of their own welfare funds. Fundraising will be approved by the appropriate commander after consultation with the DA ethics official or designee.

(1) An Army organization — including, but not limited to, units, installations, and FRGs — may officially fundraise from its own community members or dependents and from all persons benefiting from the Army organization. (For example, an installation may benefit from the brigade or unit FRG, thus permitting a brigade or unit FRG to fundraise throughout the installation.) Fundraising must be for the organization's informal fund, as opposed to a private charity, a particular military member, or a similar cause, and be approved by the commander with cognizance over the organization and coordinated with the commander with cognizance over the location of fundraising if different from the organization area. Commanders will consult with their Staff Judge Advocate or ethics counselor and avoid all conflicts with other authorized fundraising activities.

(2) Commanders may approve requests from FRG informal funds to conduct fundraising events in accordance with the requirements of DOD 5500.7-R as described above and in compliance with AR 600-29.

(3) Informal fundraising that occurs within the Army Reserve will have the approval of the unit commander and the servicing Staff Judge Advocate and/or ethics counselor. To address fundraising issues within the Army Reserve, refer to Army Reserve regulations.

e. Informal fund cap. FRGs are not established to raise funds, solicit donations, or manage large sums of money. They are not equipped to handle the complex tax ramifications and stringent accounting requirements that can result from excessive informal funds. FRG informal funds will therefore not exceed an annual gross receipt (income) cap of \$10,000 per calendar year from all sources, including fundraising, gifts, and donations. Unit commanders may establish a lower annual income cap.

(1) State and local laws and the requirements of Status of Forces Agreements may make a lower FRG informal fund cap necessary at some locations within or outside the continental United States. Commanders and fund custodians will consult their Staff Judge Advocates to ensure that FRG informal funds comply with all local requirements.

(2) FRG informal funds may only be raised and maintained for specific planned purposes consistent with the purpose of the informal fund. If the purpose of the fundraising event is inconsistent with the FRG informal funds SOP, commanders will not approve the fundraising event.

(3) The FRG informal fund ledger will reflect the costs earmarked for the planned event. For example, if an FRG is planning a holiday party with a planned cost of \$3,000, the ledger might reflect the following costs: dinner \$2,100; hall rental \$250; and band \$650.

f. Gifts to FRG informal funds. Unit commanders may accept an unsolicited gift or donation of money or tangible personal property of a value of \$1,000 or less for its FRG informal fund after consultation with the unit ethics counselor. Unsolicited gifts or donations to the FRG informal funds are considered income and impact the FRG informal fund annual income cap of \$5,000.

J-8. Family readiness group external fundraising

As an official activity of the DA, the FRG may not engage in external fundraising and may not solicit gifts and donations. However, in accordance with AR 1-100 and with the advice of the ethics counselor, commanders and FRG leaders may, in response to an appropriate inquiry, inform potential donors of the needs of the Army in relation to assisting Army families.

J-9. Unsolicited donations to the Active Component

a. Appropriate gift acceptance authorities may accept unsolicited gifts and donations made to the Army intended for FRG support; these donations will be added to the Garrison's FRG supplemental mission account, pursuant to paragraph 3-2 a of this regulation and AR 215-1 after consultation with an ethics counselor. The director, FMWR (DFMWR), will assign these donations intended for FRG use to program code SA, department code "9J," to prevent disbursing donations intended for FRG use into another ACS mission or for any other purpose. These supplemental mission donations do not expire at the end of the fiscal year, and balances automatically roll over into the following fiscal year.

b. Acceptance authority levels for unsolicited gifts and donations to the FRG supplemental mission account will be in accordance with the rules governing gifts to NAFI in AR 215-1.

c. Supplemental mission donations are NAFs that may be used only to supplement the mission activity. They are not MWR NAFs. MWR NAFs may not be expended for FRG support. Commanders may use supplemental mission donations intended for FRGs for any purpose that the commander determines clearly supplements an established mission of the FRG so long as appropriated funds are not

authorized. However, in accordance with the policies listed in chapter 5 of this regulation, supplemental mission donations may be used for reimbursement of statutory volunteer incidental expenses if appropriated funds are not available. The use must be consistent with this regulation and the provisions governing supplemental mission NAFs in AR 215-1 and DODI 1015.15.

(1) The first priority in using supplemental mission NAFs intended for FRGs is to encourage maximum attendance and participation at FRG meetings — for example, by providing food and refreshments. Using supplemental mission NAFs to support a unit ball is an example of an unauthorized expenditure because it fails to supplement an established mission of the FRG.

(2) Commanders may not authorize the use of supplemental mission NAFs for any purpose that cannot withstand the test of public scrutiny or which could be deemed a misuse or waste of funds. Using supplemental mission NAFs to fund a lavish cruise to promote "cohesion" among FRG members is an example of an excessive and inappropriate use of funds.

d. Supplemental mission NAFs are not informal funds. The provisions concerning informal funds contained in this regulation are inapplicable to supplemental mission NAFs. Supplemental mission NAFs will not be deposited into an FRG informal fund and will not impact the annual FRG informal fund income cap.

e. The DFMWR will properly disburse supplemental mission donations intended for FRG support. The unit commander will submit an approved purchase request that includes a brief description of the item(s) requested, total funds required, dates the items are needed, and vendor or source of the items to be purchased to the DFMWR for processing. The DFMWR will disburse such supplemental mission donations between FRGs supported by that Garrison's ACS Center, to include recruiting and the Army Reserve Component. Army National Guard units are not included for these supplemental mission accounts.

f. Garrison Commanders may accept unsolicited gifts into the supplemental mission program when the donor intends the donation or gift to be used only in support of FRGs that are experiencing certain deployment cycle events, such as preparing for deployment, deployment, and redeployment. The DFMWR will ensure that the supplemental mission donations are disbursed to FRGs whose Soldiers are experiencing the deployment cycle event stated in the donation. This ensures that the Garrison fulfills the conditions of the gift which the commander accepted. For example, a donor intends a gift to be used "for the families of deployed Soldiers". The DFMWR ensures only FRGs whose units have deployed Soldiers share in the supplemental mission donation.

g. The Garrison Commander may not accept unsolicited gifts into the supplemental mission program when the donor intends the donation or gift to be used

only by a named FRG. For example, a donor intends a gift to be used "for Brigade X's FRG." Garrison Commander must decline the gift because it creates disparity between FRGs experiencing the same deployment cycle events.

h. Commanders and FRG leaders must be careful to avoid stating or implying that the Army officially endorses any person or private organization that offers a gift. The commander and FRG leadership may not promise donors that donations are tax deductible. Businesses may be encouraged to speak with their tax adviser regarding business tax deductions.

i. Commanders who are offered donations they may not accept will consider referring the prospective donor to other Government or private organizations, such as Army Emergency Relief, local tax qualified charities, foundations, and fraternal or service organizations.

j. Commanders will seek guidance from their servicing Judge Advocate and ethics counselor when they receive offers of unsolicited donations for FRG support. For further regulatory instruction regarding gifts offered to the Army or to individuals, see AR 1-100 and AR 1-101

J-10. Unsolicited donations to a Reserve Component

The procedures for accepting donations or gifts for an RC may differ, depending upon location and activation status. For RC units attached to an Army Garrison or installation, see instructions above regarding the acceptance authority for accepting unsolicited donations intended for FRG support. For guidance regarding gifts intended for an RC not attached to a Garrison or installation, see AR 1-100 and AR 1-101. Commanders are also encouraged to seek guidance from their ethics counselors. For specifics, refer to Reserve Command regulations.

J-11. Private organizations

Private organizations (POs) have substantially more authority than FRGs to conduct fundraising and to engage in social activities in accordance with AR 210-22, AR 600-29, and DOD 5500.7-R. Individuals may establish POs that share the same family readiness goals and objectives as FRGs. To prevent potential conflicts of interest, if such POs are established, managers or board members of the PO will not also be placed in FRG leadership positions. It is essential that commanders and Government personnel treat such POs in the same manner as all similarly situated POs. Commanders may not direct the establishment or the activities of a PO and must treat POs according to the requirements of AR 210-22, AR 600-29, and DOD 5500.7-R, as applicable. Commanders will seek guidance from their servicing Judge Advocate's Office and ethics counselor regarding private organization issues.

J-12. Commercial sponsorship

FRGs 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. In accordance with AR 215-1 and DODI 1015.10, commercial sponsorship is generally only authorized for official MWR programs and events.

J-13. Official information

Official FRG information relates to command and mission-essential information that the commander believes families need to be better informed. Official information relates to unit mission and readiness. It includes training schedule information, upcoming deployments, unit points of contact, and the chain of concern. Official information is subject to all applicable regulations governing its use and to guidance in AR 25-55 and 5 USC 552(b).

Fort Gordon Fundraising Guide

Appendix 2

INFORMATION PAPER

ATZH-JA

20 January 2006

(Revised 23 February 2009)

SUBJECT: Family Readiness Groups and Fundraising

1. Purpose. The purpose of this information paper is to address the purpose of, and funding for, family readiness groups (FRGs) and to explain under what conditions FRGs might fundraise for non-official activities. This information paper also addresses fundraising in general.

2. Background. In August 2005, the Department of the Army clarified that Family Readiness Groups (FRGs) are solely official command programs. As such, commanders are responsible for their operation and funding. Because FRGs are now considered solely an official command program, their ability to fundraise is significantly limited.

3. Support to FRGs.

a. FRGs are a command information program designed to increase morale by establishing a network of assistance and communication between family members and the chain of command, through which information is passed to educate family members about various military topics and about services available to them—particularly during deployments. Through this network, family members should be provided the practical tools necessary to cope with the demands of an Army at war.

b. Commanders may authorize the following types of official support to FRGs: office space and equipment, paper and printing support for official newsletters, use of official mail, word processing support, government vehicles, training, and use of government communications systems, to include faxes, e-mails, and phones.

c. Because FRGs are an official command program, they are subject to the normal ethics and spending rules and limitations. Therefore, commanders may not authorize appropriated dollars for personal, non-authorized purposes, such as social events, gifts, food, entertainment, and personal expenses.

d. FRG leaders and those non-employees who wish to operate government vehicles as part of their FRG responsibilities should register as volunteers with the installation volunteer coordinator at ACS (Lynn Harshman/706-791-3880/3579).

4. Fundraising.

a. The Army cannot fundraise—except under the most limited conditions. Therefore, because an FRG is an official part of the Army, it is likewise limited and may not generally fundraise to pay for social events, gifts, food, entertainment, or other personal expenses.

b. Commanders may, however, establish an informal fund to support the unofficial activities of FRG members. Informal funds—often referred to as “cup and flower” funds—are authorized by AR 600-20, paragraph 4-21. Traditionally, they have not been used as a tool to fundraise—rather, they have most often simply accepted dues or other contributions from members from which cards, flowers, and certain types of gifts for members of the unit are purchased. Informal funds may, however, receive moneys collected through more traditional fundraising projects.

c. An FRG may have an informal fund and fundraise on behalf of its informal fund under the following conditions:

(1) The commander must first establish an FRG informal fund with a written SOP.

(2) The SOP must establish the purpose of the informal fund. Any moneys distributed from it must be used consistently with those purposes to benefit the members of the FRG.

(3) The SOP must include the following minimum information/statement:

(a) the FRG name;

(b) a description of the FRG’s purpose and functions;

(c) a summary of the FRG’s routine activity for which the funds are collected;

(d) this statement: “This FRG informal fund is for the benefit of the FRG members only and is established exclusively for charitable purposes and to provide support to Soldiers and family members as the Soldiers and families adapt to Army life. It is not a business and is not being run to generate profits. It is not an instrumentality of the United States Government.”

(4) The informal fund may not exceed \$10,000 or it could incur a tax liability for the commander and the fund’s custodians.

(5) The informal fund should be kept in a non-interest bearing bank account. The commander must appoint in writing at least two fund custodians (primary and

alternate) to account for funds and to ensure they are spent in accordance with applicable guidance and the informal fund SOP. Commanders should monitor the informal fund upon the change of custodians or command.

(6) The commander may authorize the FRG to fundraise on behalf of its informal fund inside the commander's own organization with no additional approvals. That fundraising may not occur "in the workplace." "In the workplace" does not include unit-exclusive parking lots, primary lobbies, and corridors of buildings that are as far removed from individual work areas as possible. Commanders must also consider whether fundraising detracts from the CFC campaign.

Example (unit area): An informal fund may conduct a bake sale within its own unit areas as described immediately above without seeking Garrison Commander approval.

Example (outside unit area): An informal fund desires to conduct a crafts sale outside of the unit area. Garrison Commander approval is required.

Example (consider effect on CFC): An informal fund desires to conduct a fundraiser for a holiday party during the CFC campaign period. If this fundraiser detracts from the CFC campaign, the commander should not authorize it.

(7) Competition with AAFES is prohibited. Check with AAFES. Fundraising by the resale of non-handmade goods and of foods and beverages, such as canned and bottled water and soft drinks, fountain drinks, candy bars, pre-packaged snacks, and Krispy Kreme doughnuts, competes with AAFES. Sale of hot foods such as hotdogs, hamburgers, French fries, and tacos also competes with AAFES. Sale of baked items such as brownies, rice crispy treats, and home-cooked cookies, pies, and cakes is allowed.

(8) To seek an exception to the prohibition on competing with AAFES, before conducting a resale activity that sells competing goods or services or that involves the preparation of meat or other perishable foods, coordinate, as appropriate, with AAFES (706-793-0585/0233) and the Veterinarian (706-787-4452).

Example (competition with AAFES and health concerns): An informal fund desires to sell hotdogs at lunch for two weeks. Before doing so, the fund must obtain AAFES approval and coordinate with veterinary services about health safety before serving hot meat products.

(9) FRGs may fundraise on behalf of their informal fund outside their own organization (but on post only and not "in the workplace") with the approval of the Garrison Commander. Requests must be submitted IAW current edition of Garrison Commander's Policy Memorandum on Fundraising, to the Directorate of Morale, Welfare, and Recreation, NAF Support Services Division (IMGO-MWN/ATTN: 706-

791-2012). Requests must be in writing and be submitted 10 work days in advance.

Example: The Garrison Commander has determined that “in the workplace” does not include parking lots or the primary lobbies and corridors of buildings.

Example: The offices in Darling Hall are workplaces, but the Garrison Commander may determine that the common area at the entrance to Darling Hall is not in the workplace.

Example: The Garrison Commander has determined that the sidewalk in the vicinity of the PX is not in the workplace.

(10) Solicitations that occur outside the federal workplace may create additional disruptions and also compete with the CFC and AER for donations. The Garrison Commander will consider the negative effects of such competing interests when reviewing requests from organizations to raise funds outside of the federal workplace during the CFC and AER campaign periods.

Example: The installation’s official CFC kickoff program is scheduled at 1500 on Friday, 1 October. The Garrison Commander should disapprove a request from the Signal Corps Regimental Association to conduct a fundraiser and membership drive during the month of October.

Example: On 12 October, the Warrant Officers Association asks if it may conduct a 10K run on Barton Field. The installation has already approved a special CFC event on Barton Field on 12 October. The Garrison Commander should deny the request.

Example: The Fort Gordon Spouses Club, an AR 210-22 private organization, desires to conduct its annual gift-wrapping event in the vicinity of the PX during the same period as the CFC campaign. The Garrison Commander may determine that the gift-wrapping does not detract from the CFC campaign.

(11) FRGs are encouraged to coordinate their SOPs with Army Community Services (706-791-1958/3579) before submitting fundraising requests to the NAF Support Services Division.

(12) FRGs **may not solicit off post for contributions** to their informal funds or for gifts or for any other purposes. Such requests are strictly prohibited. FRGs **may not fundraise off post** in any way.

(13) Unsolicited gifts and donations with value of more than \$1,000 **may not** be accepted by individual FRGs. Such unsolicited offers must be referred to Army Community Services, IMG0-MWA (ATTN: Ms. Shawn Williams/706-791-1958/3579).

(14) FRGs may not enter into any commercial sponsorship agreement with any non-Army entity. FRGs must avoid any actions that even imply endorsement of any non-Army entity.

5. Private Organizations. As noted above, FRGs are official programs of the commander; they are not private organizations. For information about forming private organizations, contact the Directorate of Morale, Welfare, and Recreation, NAF Support Services Division, ATTN: IMG0-MWN (Ms. Patricia Camacho/706-791-2611/2012).

6. For questions concerning fundraising, you should contact your ethics counselor at the Office of the Staff Judge Advocate, ATTN: Terence Cleary/706-791-4454, or the Directorate of Morale, Welfare, and Recreation, NAF Support Services Division, ATTN: IMG0-MWN (Ms. Patricia Camacho/706-791-2611/2012).

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Appendix 3

ESTABLISHING AN SOP FOR AN FRG INFORMAL FUND

Informal Fund of the Family Readiness Group, - (AR 600-20, paragraph 4-21, and CFSC Army Commander's Guide)

1. **NAME OF THE INFORMAL FUND:** The name of this fund is the Informal Fund of the Family Readiness Group, _____.
2. **PURPOSE:** The purpose of the fund is to provide support to the Family Readiness Group, _____. The support this fund provides supplements the official support the FRG receives from appropriated fund sources. This FRG informal fund is for the benefit of the FRG members only and is established exclusively for charitable purposes and to provide support to Soldiers and Family members as the Soldiers and Families adapt to Army life. It is not a business and is not being run to generate profits. It is not an instrumentality of the United States Government.
3. **FINANCES:** The fund will generate revenue through the collection of dues and approved fundraisers.
 - a. Funds raised shall be in support of the purposes of this fund: holiday parties; other parties or outings; newsletters that contain predominantly unofficial information; non-ACS sponsored volunteer recognition events; supplemental unit send-off and welcome home activities; and purely social activities, such as baby showers, birthday parties, pizza parties, and potluck dinners.
 - b. These funds will not augment other unit informal funds, such as the unit's "cup and flower" informal fund. FRG informal funds will not be used to purchase gifts for traditional military gift giving occasions, such as soldier farewells that are not related to the unit FRG.
 - c. These funds will not be used to purchase items or services that may be paid for with appropriated funds.
 - d. To avoid IRS tax liabilities, this fund is capped at \$10,000. If the balance exceeds \$10,000, the fund will reduce the amount to appropriate levels to ensure that the average FRG informal fund value remains below \$10,000 per year.

e. To the extent possible, informal funds will be collected for a specific goal, event, or activity, keeping in mind that the purpose of the fund is to benefit members as a whole.

4. FUND CUSTODIAN:

a. The unit commander will designate in writing a fund custodian and an alternate fund custodian. The custodians are liable for any loss or misuse of funds. Non-military fund custodians should be registered as volunteers (10 U.S.C. § 1588) through the installation volunteer coordinator at Army Community Service.

b. The unit commander will authorize the opening of a bank account and will designate in writing the persons authorized to write checks on the account. The account will be in the name of this informal fund. The unit commander or deployed soldiers will not be signatories on this account.

c. The custodian will report to the unit commander at least monthly. Reports are also required upon change of command, change of custodian, and whenever there is suspicion of irregularity. The reports are not formal audits, but will summarize the fund's financial status, to include current balance, total amount earned, and itemized expenditures.

d. Formal accounting procedures are not required.

e. The funds will not be deposited with or mixed with personal funds, unit MWR funds, or any other informal funds. The funds will not be deposited in interest or dividend bearing accounts.

5. FUND-RAISING ACTIVITIES.

a. Requests to conduct fund-raising activities outside of the unit area of _____ shall be submitted to DFMWR, NAF Support Services Division, Darling Hall, in accordance with Garrison Commander Policy Memorandum No. 17.

b. The fund will not engage in resale activities at any time or duplicate, or compete with MWR Nonappropriated Fund activities or the Army and Air Force Exchange Service (706-793-0818/0585).

c. The fund will not conduct any external fund-raising activities, which is described as outside the installation. For example, the fund shall not contact off-post businesses for donations, conduct car washes outside the installation, or participate in bake sales or concessions sales outside the installation.

6. GENERAL:

a. The Custodian will send a copy of this SOP to DFMWR, NAF Support Services, and shall also inform DFMWR in writing of any changes in the fund's scope or activities.

b. The Informal Fund may be dissolved with the consent of a majority of its members.

7. The SOP for the Informal Fund of the FRG of _____ was approved on _____ by a majority of its members.

8. Upon a change of command, the outgoing commander will inform the incoming commander of the existence of this informal fund.

FUND CUSTODIAN

COMMANDER

[Signature Block]

[Signature Block]

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Appendix 4**

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TRADOC Regulation 350-6 (2011)

2-6i. Fundraising.

(1) No cadre member may sell any product, service, or opportunity to IET Soldiers.

(2) No IET Soldiers will be directed to participate in or make purchases at any authorized fundraising activities conducted in the brigade, battalion, company, or training area.

(3) Family readiness group (FRG) fundraising activities are only permitted IAW AR 608-1 Appendix J, Army FRG Operations, AR 210-22, Private Organizations on Department of the Army Installations.

(4) This provision does not prohibit Soldiers from voluntarily contributing to officially authorized campaigns (such as, Combined Federal Campaign, Army Emergency Relief, etc.) or making chapel offerings.

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Appendix 5**

References

- a. DoD 5500.7-R, Joint Ethics Regulation;
- b. DoD Dir. 1000.15, Private Organizations on DoD Installations;
- c. DoD Dir., 5035.1, Combined Federal Campaign (CFC) Fund-Raising Within the Department of Defense;
- d. Title 5, Code of Federal Regulations, Part 950, Solicitation of Federal Civilian and Uniformed Service Personnel for Contributions to Private Voluntary Organizations (1999);
- e. AR 210-22, Private Organizations on DA Installations;
- f. AR 215-1, Morale, Welfare, and Recreation Activities and Nonappropriated Fund Instrumentalities;
- g. AR 600-20, Army Command Policy;
- h. AR 600-29, Fund-Raising Within the Department of the Army;
- i. AR 930-4, Army Emergency Relief ;
- j. AR 165-1, Chaplain Activities in the United States Army.