

## Information Paper

1. **SUBJECT:** Unit Fundraising

2. **PURPOSE.** To inform Fort Carson personnel of the restrictions on fundraising by military units and outline the methods by which unit members may raise funds for the welfare of Soldiers and their family members.

3. **BOTTOM LINE.** Statute and regulation preclude military units from officially soliciting gifts or otherwise engaging in fundraising activities in an official or duty capacity. Unit members and friends may, however, raise funds for the welfare of Soldiers and their family members through various unofficial organizations, including informal funds (IFs), private organizations (POs), and Family Readiness Groups (FRGs).

4. **DISCUSSION.**a. Definitions.

(1) Fundraising. The Army defines fundraising as “[a]ny activity conducted for the purpose of collecting money, goods or other support for the benefit of others.” AR 600-29.

(a) Official fundraising. Federal employees may participate in fundraising in an official capacity only if a statute, Executive Order, regulation, or other source authorizes the fundraising as part of the employee’s official duties. Official fundraising in the Army is typically limited to the Combined Federal Campaign (CFC) and Army Emergency Relief (AER). Official fundraising may be conducted on duty and in uniform, and officially endorsed using titles and organization names.

(b) Unofficial fundraising. If any part of the funds raised by an event or effort will go to an organization other than the CFC or AER, the fundraising is “unofficial” and restricted by a variety of rules. Army personnel may not conduct unofficial fundraising during duty time, in uniform, or in the federal workplace

(2) Major fundraising: a fundraising activity conducted with the written permission of the installation commander where contributions or sales are solicited from the entire military community. Only POs with valid authorization to operate in Fort Carson wide may conduct major fundraisers. All profits generated by major fundraisers must be used for charitable purposes and to defray legitimate expenses incurred by the fundraiser. Charitable purposes may include the welfare of Soldiers and their family members.

(3) Minor fundraising: a fundraising activity conducted solely within the membership of a PO or IF to raise funds for general or specific purposes related to the entity. Bona fide guests may be invited to participate, but the military community as a whole may not be targeted or involved in the fundraising. All money generated from minor fundraisers may be spent on behalf of the members of the PO or IF, in accordance with the entity’s purpose, or donated to a charitable cause.

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(4) Federal workplace. By definition, the Federal workplace includes the entire DoD installation. Unofficial fundraising may not occur in the Federal workplace. The Installation commander may, however, designate limited areas as public places on the installation where groups may fundraise.

b. Fundraising by military units. Military units are precluded by statute and regulation from officially soliciting gifts or otherwise engaging in fundraising activities. All unit fundraising activity outside CFC and AER is considered unofficial fundraising.

c. Raising funds for unit welfare activities. Although military units may not officially raise funds, unit members may unofficially raise funds for the welfare of Soldiers and their family members. These fundraising efforts must, however, be conducted in an unofficial capacity; this means that fundraising must be performed off-duty, voluntarily, outside the Federal workplace, and out of duty uniform. Contributions may also not be solicited from subordinates.

(1) Informal funds. Informal funds (IFs) are unofficial activities allowed to operate on military installations without formal authorization because of their limited scope. They may be created for a variety of reasons, including office coffee funds, cup and flower funds, and holiday party funds. Expenditures must be consistent with the purpose and function of the IF.

(a) Net worth. IFs must normally maintain a net worth of \$1,000 or less. The IF may temporarily exceed this limit in preparation for a special event or project, such as a holiday party; however, the IF must specifically earmark the excess for the event or project, and establish a projected date when the fund's net worth is expected to return to \$1,000 or less.

(b) Fundraising activities. Under the Fort Carson Private Organizations and Fundraising Policy, IFs may conduct only minor fundraising. An IF that wishes to conduct major fundraising must first obtain authorization to operate as a PO or fundraise under the auspices of an existing PO that agrees to donate the proceeds to the IF.

(2) Private organizations. Private organizations (POs) are self-sustaining, non-Federal entities that operate on Fort Carson installation only with written approval from the local Installation commander. Their members act exclusively outside the scope of any official position they occupy in the Federal government or its instrumentalities. POs must operate in accordance with DoDI 1000.15 and the Fort Carson Private Organizations and Fundraising Policy.

(a) Fundraising activities. POs may engage in minor fundraising and are the only entities that may conduct major fundraisers on Fort Carson installation. While the proceeds from major fundraisers must be used for charitable purposes, this may include donating the proceeds to a FRG or otherwise using them for the welfare of Soldiers and their family members.

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(b) Miscellaneous PO rules. Income from major fundraising is taxable under German law unless a PO is registered as a German charitable organization. Also, POs must use the host nation postal service or a commercial carrier to import items intended for resale; they may not have such items delivered through the Army Post Office (APO) system.

(3) Family Readiness Groups. Family Readiness Groups (FRGs) are organizations comprised of Soldiers, family members, and others interested in the welfare of the unit members.

(a) Primary function. The primary function of FRGs is to provide an avenue of mutual support and assistance, and a network of communication among the family members, the chain of command, and community resources.

(b) Fundraising activities. Fundraising is not an official or authorized function of FRGs; however, FRG personnel may raise funds for the welfare of the Soldiers assigned to the unit and their family members. Although FRGs are command-sponsored organizations when performing their authorized functions, when engaging in fundraising they operate as unofficial IFs subject to the rules that otherwise apply to IFs (i.e., maximum net worth of \$1,000, minor fundraising only). FRGs that exceed a net value of \$1,000 in uncommitted funds or want to conduct major fundraising must either form an auxiliary PO that operates under the rules applicable to POs, or fundraise under the auspices of an existing PO that has agreed to donate the proceeds to the FRG.

d. Support to unofficial fundraising. Section 3-211b of the Joint Ethics Regulation (JER) permits limited logistical support (including use of DoD facilities and equipment, and the personnel necessary for proper use of the equipment) to unofficial fundraising events, provided--

(1) The support does not interfere with the performance of official duties or detract from readiness;

(2) The support promotes legitimate DoD community relations, public relations or recruiting interests, or military training objectives can be met by providing the support;

(3) The event is appropriate for DoD support;

(4) The event benefits the DoD or the local community;

(5) The command is able and willing to provide the same support to comparable events sponsored by similar organizations;

(6) The support does not violate any statutes or regulations; and

(7) If the fundraising occurs in the Federal workplace, and the entity conducting the fundraising is affiliated with the CFC, advance permission is obtained from the Office of Personnel Management.

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5. **CONCLUSION.** While military units may not engage in fundraising in an official or duty capacity, IFs, POs, and FRGs provide means for raising funds for the welfare of Soldiers and their family members.

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DATE: 17 November 2000