Private Organizations, "For Us, By Us" Unofficial Activities and Soldier and Family Readiness Group Informal Funds Handbook



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CHAPTER 1 - DEFINITION/AUTHORITY

- 1. This booklet provides information and sample documents for private organizations (PO), "For Us, By Us" unofficial activities (FUBU) and Soldier and Family Readiness Group (SFRG) Informal Funds (IF) on Joint Base San Antonio (JBSA). The governing directives for these activities are AFI 34-223, *Private Organizations (PO) Program*, AR 608-1, *Army Community Service*, AR 608-1, AFI 36-3101, *Fundraising*, and DOD 5500.07–R, *The Joint Ethics Regulation*. Compliance with these directives is mandatory.
- 2. POs are self-sustaining special interest groups set up by people acting outside the scope of any official position they occupy in the federal government to include civilians, contractors, Air Reserve and Air National Guard members.
 - a. POs are not integral parts of the military service or federal entities.
 - b. They are not non-appropriated fund instrumentalities (NAFIs) as defined in AFI 34-201.
 - c. They are not entitled to the sovereign immunities and privileges given to the Air Force.
 - d. They operate on Air Force installations, including Air Force led joint bases like JBSA, with the written consent of the installation commander.
- 3. FUBUs are small groups of individuals who are not required to be formally established as POs because their current assets (which include cash receivables and investments) do not exceed a monthly average of \$1,000 over a three-month period. Examples of FUBUs include coffee funds, flower funds, sunshine funds, etc. A FUBU may exceed the \$1,000 cap for up to six months to help with a large event like a holiday party subject to prior approval. FUBUs are approved to operate by their unit commanders and civilian leader counterparts. FUBUs' fundraisers are focused within the unit -- as the "By Us" part of their name suggests. These internal fundraisers are also approved by the unit commander or civilian leader. But FUBUs may request to hold fundraisers outside of their unit but still on base. (They are prohibited from off-base fundraising.) FUBU fundraisers outside the unit follow the same request process as PO fundraisers. FUBUs must provide financial documents annually to their unit commander or civilian leader. It is the responsibility of the FUBU to initiate actions when its assets exceed the \$1,000 limit.
- 4. An SFRG is a command-sponsored organization of Soldiers, civilian employees, family members (immediate and extended) and volunteers belonging to a unit formed in accordance with AR 608-1, App. J, AR 600–20.
 - a. SFRGs provide mutual support and assistance to family members and also provide a network of communications among family members, chain of command and community resources. SFRGs are established to provide activities and support that enhance the flow of information, increase the resiliency of unit Soldiers and their families, provide practical tools for adjusting to military deployments and separations and enhance the well-being and esprit de corps within the unit.
 - b. SFRG IFs are funds authorized by their unit Commanders in accordance with AR 608-1, Appendix J, AR 600-20, and DoD 5500.07-R.

- c. SFRG IFs are funds generated by SFRG members that are used to benefit the SFRG membership as a whole. SFRG IFs assets and financial records and accounting will be managed according to AR 608-1, AR 600-20 and DoD 5500.07-R.
- d. SFRG IFs will not exceed an annual gross receipt (income) of \$10,000 per calendar year.

<u>CHAPTER 2 – RESPONSIBILITIES</u>

1. Installation Commander:

NOTE: The responsibilities outlined in this section have been delegated to the 502d Force Support Group Commander (502 FSG/CC).

- a. Authorizes the establishment and operation of a PO:
 - (1) When it is determined that the PO will make a positive contribution for base personnel.
 - (2) May withdraw authorization if the PO:
 - (a) Prejudices or discredits the US Government.
 - (b) For not complying with the requirements of AFI 34-223 or other applicable directives.
 - (c) Any other reasonable or just cause.
- b. Approves requests for fundraisers or may delegate this approval function to the 502d Force Support Squadron Director (502 FSS/CL).
- c. Designates the 502 FSS/CL to monitor and advise on POs.
- d. Authorizes contractor participation in POs when justified.
- e. Ensures background checks are completed for employees and volunteers of POs who have contact with children under the age of 18 in Department of Defense-operated programs used to supplement or expand childcare or youth services.
- f. May direct a PO to eliminate duplication of services, particularly when these services compete with the installation's non-appropriated fund revenue-generating activities.

2. 502 FSS/CL:

- a. Monitors POs.
- b. Advises PO officers.
- c. Directs the Resource Manager (502 FSS/FSR) to keep a file on each activity.
- d. Coordinates on all fundraising requests to include FUBU and SFRG IF fundraising requests for events to be held outside of the unit's facilities and immediately surrounding area (curtilage) or focused on people outside of the unit's members and families.

3. 502 FSS/FSR:

- a. Reviews each PO annually to make sure documents, records and procedures outlined in this Guidance Handbook and AFI 34-223 are in order.
- b. Coordinates on all requests to establish a PO. The purpose of this coordination is to maintain copies for maintenance of activity file. At a minimum, files must contain:
 - 1) Constitution and By-laws
 - 2) Revalidation letters showing dates of review
 - 3) Financial statements/reviews/audit reports
 - 4) Minutes of meetings
 - 5) Proof of required insurance or appropriate waiver
 - 6) Current list of officers/points of contact
 - 7) Tax-exempt approval from the IRS (if applicable)
 - 8) Other documents required by MAJCOM and/or Installation Commander or other approved waivers
- c. Reviews all fundraising requests to include FUBU and SFRG IF fundraising requests for events to be held outside of those activities facilities. The purpose of this coordination is to verify that activity files are current.

4. 802 FSS/FSFR:

- a. Mobilization and Deployment maintains an updated record of all SFRG IFs on JBSA.
- b. The record will include updated contact information for the SFRG Leaders, SFRG Fund Custodian and SFRG Alternate Custodian (*Additional Resources*).

5. 502 FSG Legal Office:

- a. Reviews all requests to establish a PO. This review includes Constitution and/or bylaws (as applicable) and provides appropriate recommendation to commander for approval/disapproval.
- b. Coordinates with ARNORTH and FSH OSJA when Army expertise is necessary to review matters related to SFRG IFs.
- 6. Office of the Staff Judge Advocate Army (ARNORTH & Fort Sam Houston OSJA, ARSOUTH OSJA, AMEDDC&S OSJA, MEDCOM OSJA, other Army OSJA):
 - a. Reviews all SFRG IFs requests and provides appropriate recommendations to the

SFRG Commander.

b. Review and coordinate all SFRG IF fundraising requests that will be held inside Army command's spaces or surrounding area (i.e. inside their buildings, depots, motor pools, the Quadrangle, building curtilage, etc.)

7. Unit Commanders

- a. Unit Commanders have limited control and supervision over POs by ensuring compliance with DoD and service guidance, but they must not dictate a POs specific internal policies or activities. Those are left to the membership and its elected officers.
- b. Unit Commanders are the approving authorities for FUBU operation on the installation.
- c. Army Unit Commanders are the approving authorities for SFRG IF operation on the installation.

CHAPTER 3 - SETTING UP A PRIVATE ORGANIZATION, 'FOR US, BY US' OR SOLDIER AND FAMILY READINESS GROUP INFORMAL FUND

- 1. Overview. In order to conduct fundraising activities on JBSA, an organization must be approved to operate on the installation. The 502 FSG/CC has been delegated the authority to approve PO fundraisers across the installation, as well as FUBU and SFRG IF fundraisers focused outside of their unit.
- 2. Process. In order to become recognized as a PO, an organizations must submit an application. An application is a packet of specified documents and are as described below. Requestors are responsible for maintaining a copy of their entire submission. During the coordination process the packet will be routed through 502 FSG/JA and 502 FSS/CL and then to the 502 FSG/CC for final approval. The approved documents will be returned to 502 FSS/CL for filing which will then provide a copy of the approval to the requestor.

3. Documents.

- a. Private Organizations. If the organization is seeking PO status, a proposed constitution and/or by-laws must be submitted to the 502 FSS/FSR accompanied by a list of elected officers and a treasurer acceptance statement. If a PO does not carry the recommended liability insurance coverage, it will also submit a letter requesting a waiver of insurance requirements at this time. The constitution must address the nature, function, classification, objectives, membership eligibility and sources of income of the PO. It must notify all members of their personal financial responsibility. It must describe the responsibilities of PO officers for asset accountability, liability, satisfaction and sound financial and operational management. Finally, it must provide specific guidance on how to dispose of residual assets remaining in the PO treasury after satisfaction of outstanding debts.
- b. "For Us, By Us" Activities. FUBUs are approved by unit leadership. Submit a copy of the unit commander or civilian leader's written approval to operate the FUBU when requesting to fund raise on the installation outside the unit.
- c. Soldier and Family Readiness Groups Informal Funds. SFRG IFs are approved by the unit commander. Submit a copy of the unit commander's approval to operate the SFRG (*Additional Resources*).

CHAPTER 4 - OPERATING A PRIVATE ORGANIZATION, 'FOR US, BY US' OR SOLDIER AND FAMILY READINESS GROUP INFORMAL FUND

- 1. The Installation Commander provides limited supervision over POs. The Commander's control lies in the power to authorize and withdraw authorization for these organizations to operate on the installation.
- 2. SFRG IFs organizations, activities, financial operations will be conducted in accordance with AR 608-1, AR 600-20, and DoD 5500.07–R.
- 3. POs and FUBUs may not discriminate in hiring practices or membership policies based on age, race, religion, color, national origin, ethnic group or gender.
- 4. POs and FUBUs may organize around a cultural or ethnic focus as long as they do not restrict their membership on the basis of culture or ethnicity.
- 5. POs and FUBUs may not haze or harass, either physically or mentally, as part of their initiation rights.
- 6. POs may operate as religiously oriented organizations provided:
 - a. Requests by similar organizations are also approved.
 - b. Authorization is for nonexclusive use of government facilities.
 - c. No sign or insignia or other organizational identification is placed on or inside government facilities except when the organization's activities are in progress.
 - d. Membership is not restricted to members of the religion involved.
 - e. The installation staff chaplain coordinates on the request.
- 7. POs, FUBUs and SFRG IFs must be self-sustaining. There will be no direct financial assistance to an activity from a NAFI in the form of contributions, dividends, or donations of monies or other assets.
 - a. They must properly plan and adequately control the monetary aspects of their goals and objectives.
 - b. Individual members may not derive income from the activity except for specific performed services.
- 8. POs, FUBUs and SFRG IFs must ensure that fiscal accountability is maintained and that appropriate internal controls are established to prevent misuse of funds. They must ensure their goals and objectives are properly identified and their assets are properly controlled and programmed. Tools used in this financial management process include budgets and financial statements.
 - a. Budgets. Budgets are logical, detailed plans for operations that are expected to occur, expressed in dollars for the year (may be broken down by month and quarter).

Budgets project activities (income and expense), as well as planned capital purchases. The purpose of a budget is to establish and define financial objectives and to outline plans to achieve those goals.

- b. Financial Statements. Typically, two different reports are associated with the financial statements: a balance sheet and an income and expense statement (*Additional Resources*).
 - (1) Balance Sheet. The balance sheet accounts for total assets (e.g. cash, accounts receivable, property, etc.) and is a statement of financial condition (assets versus liabilities and net worth) at a specific point in time.
 - (2) Income and Expense Statement. This statement provides a financial breakdown of revenue (e.g. dues, sales, fees, etc.) and expenditures (e.g. donations, awards, luncheons, etc.) for the period, usually monthly. Use an income and expense statement, either on an accrual or cash basis, to show actual monetary events that have occurred during the period.
- 9. POs with a certain level of gross annual revenue must undergo audits and financial reviews:
 - a. Gross annual revenues of \$250,000 or more; Certified Public Accountants (*CPAs*) performs annual audits. Update 502 FSS/FSR bi-weekly until final reports are compiled and sent to the PO coordinator.
 - b. Gross annual revenues of \$100,000, but less than \$250,000; accountants perform annual financial reviews. These accountants must hold a Bachelor of Arts degree in accounting. Update 502 FSS/FSR bi-weekly until final reports are compiled and sent to the PO coordinator.
 - c. Gross annual revenues of less than \$100,000, but more than \$5,000; not required to conduct an independent audit or financial review however, such POs must provide an internally-produced financial statement to 502 FSS/FSR NLT 20 days following the end of the PO's fiscal year.
- 10. POs, FUBUs and SFRG IFs may not engage in fundraisers that duplicate or compete with the Army and Air Force Exchange Service (AAFES) or 502 FSS activities.
- 11. POs, FUBUs and SFRG IFs may not engage in frequent or continuous resale activities or operate amusement or slot machines.
 - a. The prohibition against frequent or continuous resale activities does not preclude collective purchasing and sharing of purchased items by members of the POs or FUBUs so long as there is no actual resale. "Resale" is defined as the sales of items at a markup intended to generate cash in excess of that needed to pay expenses; cash generated from rounding up costs to a sales price to make a sales price more convenient to the customer does not constitute resale.
 - b. Occasional sales for fundraising purposes may be approved (e.g. bake sales or similar events). "Occasional" is defined as not more than three on-base fundraising events per organization each calendar quarter. (Off-base fundraisers are no longer counted against the total and do not have a separate total.)

- c. The occasional sales for fundraising purpose limit also does not apply to POs that sell unit/school memorabilia. Quarterly fundraising requests are required to be submitted but once approved, these "souvenir locker" sales may operate each day.
- 12. POs, FUBUs and SFRG IFs may not sell or serve alcoholic beverages.
- 13. POs must have liability insurance unless the requirement is waived.
 - a. POs for which waivers have been granted may be required to obtain insurance for certain special events which involve greater risk of injury or damage.
 - b. Insurance waivers must be re-evaluated annually by the PO's President and 502 FSS/FSR to ensure the organization's activities have not increased in risk or liability.
- 14. POs should consider bonding for its treasurer.
- 15. POs, FUBUs and SFRG IFs must comply with all applicable federal, state, local and foreign laws governing similar civilian activities.
- 16. Activity officers and members must report any signs of fraud or other improprieties to the 502 FSS/CL.
- 17. PO, FUBUs and SFRG IFs officer and member actions must not prejudice or discredit the US Government or conflict with governmental activities.
- 18. POs, FUBUs and FRG IFs may not solicit goods like gift cards from AAFES and burger patties from the Commissary for their organization on base. Off base solicitations must comply with AFI 34-223 and installation guidelines. FUBUs may not solicit gifts from outside sources, AFI 34-223, para. 9.1., SFRG IFs are prohibited from soliciting off the installation, AR 608-1, para. J-7(e).
- 19. PO, FUBUs and SFRG IFs are responsible for their tax-exempt status (if eligible and desired) and must work with appropriate federal or state taxing authorities.
- 20. Logistical support for POs and FUBUs is limited as follows:
 - a. POs and FUBUs must furnish their own equipment, supplies, and other materials. Neither non-appropriated funds (NAF) nor appropriated funds (APF) can be used to support such activities.
 - b. May be provided space for meetings of reasonable duration and frequency subject to the following:
 - (1) POs and FUBUs must reimburse for services (to include utilities) when facility is used other than on an occasional basis (unless authorized by an AF directive).
 - (2) POs and FUBUs must reimburse for any additional costs incurred by the AF resulting from such use, e.g., incremental increases in maintenance and janitorial expenses.

- 21. POs must provide the following information to 502 FSS/CL:
 - a. Any change of officers or points of contact as changes occur (Additional Resources).
 - b. Any change of treasurer (or other fund custodian) as the change occurs (*Additional Resources*).
 - c. Quarterly financial statements (POs only, by the 15th of the month following end of the quarter).
 - d. Meeting minutes (POs only, within 30 days of meeting date).
- 22. SFRGs must provide the following information 802 FSS/FSFR Mobilization/Deployment:
 - a. Change of officers or points of contact as changes occur (Additional Resources).
 - b. Change of treasurer as change occurs (Additional Resources).
 - c. Change of Commander as change occurs (Additional Resources).
- 23. POs must obtain written approval to conduct fundraising events on JBSA. FUBUs and SFRG IFs must obtain written approval to conduct fundraising events on JBSA that are outside of their unit's building and immediately surrounding area or focused on others who are not members of the unit or their families. See Chapter 5 for procedures.
- 24. Within 30 days before the authorization expires, POs are required to file an annual report (see Chapter 6 for specific requirements).

CHAPTER 5 - CONDUCTING FUNDRAISERS

- 1. Background: Prior to a PO conducting a fundraising event on JBSA (or a FUBU or SFRG IF conducting a fundraiser outside of the unit's facilities and immediately surrounding area or focused on people outside of the unit's members and families) written approval from 502 FSS/CL must be obtained. The maximum number of fundraising events a PO, FUBU or SFRG IF can conduct in each calendar quarter is three.
 - a. If an activity is not current (approved to operate and, in the case of POs, reporting compliant), their fundraising requests will not be approved/processed.
 - b. Depending on the type of fundraiser and risks associated with it, insurance may be required (typically it is not); legal will make the final determination of this requirement.
 - c. Members of the PO or SFRG IF must also be aware that they cannot work the fundraiser while in uniform or on duty.
 - d. PO requests to conduct raffles will not be approved unless all of the state requirements are met. Main requirements in Texas include the organization having IRS-approved tax-exempt status (as any form of 501(c) organization) and a limit of two raffles per year. FUBUs and SFRG IFs are prohibited from conducting raffles.
 - e. FUBUs and SFRG IFs may conduct fundraising events within their command's spaces if approved by their Commander as advised by their staff judge advocate. These fundraising events will not be counted against the maximum number of fundraising events of three per quarter.
 - f. FUBU and SFRG IF fundraisers focusing only on unit personnel and using only unit facilities need only the approval of the unit commander or civilian leader. FUBU fundraisers targeting other than unit members or unit facilities require 502 FSS/CL approval.
- 2. Process: A form requesting approval of the fundraiser must be submitted sufficiently in advance of proposed event to allow for coordination (*Additional Resources*). Typically, a 30-day lead time is sufficient for the process. This includes the 502 FSS/FSR 15 business day requirement. The coordination required depends upon the type of fundraiser that is being proposed. Following are typical types of coordination:
 - a. Facility Management: The location of the event must be approved in advance by the facility manager.
 - b. Preventive Medicine and/or Public Health / Food Safety and Sanitation: As the public health offices, they must coordinate on any fundraisers involving food sales.
 - c. 502 FSS/FSR Private Organization Coordinator: This office reviews and coordinates on all fundraising requests. The purpose of the review is to verify the requesting activity is current and eligible to conduct fundraising on the installation.
 - d. AAFES: 502 FSS will coordinate on any fundraisers potentially involving competitive sales and requests to conduct fundraising activities at their respective locations.

- e. Medical Education Training Center (METC): Fundraising on the METC campus requires coordination through METC Command.
- f. 502 FSG/JA: The 502 FSG legal office reserves the right to review all fundraising requests to ensure compliance with applicable regulations.
- g. 502 FSS/CL: The approving official for fundraising requests. The 502 FSS reserves the right to disapprove/decline any event it believes will compete with the installation's NAF revenue-generating activities. (Ref. AFI 34-223, 10.8)
- h. Other coordination. There may be other coordination required depending upon the type of fundraiser being planned. Obtaining coordination from Safety, Security Forces, etc. will be the responsibility of the requesting organization. It is the responsibility of the 502 FSS/FSR to coordinate with 502 FSG/JA, 502 FSS/CL and 502 FSG/CC (if required).

CHAPTER 6 - ANNUAL REVIEWS/RECERTIFICATIONS

- 1. Background: Annually, each PO must provide a report to the base PO coordinator. The purpose of this report is to ensure that the activity has implemented guidelines to safeguard and account for funds, as well as to update records with current officers, constitution, etc. The PO authorization date determines when annual reviews/re-certifications are due. The report is due within 20 days after the authorization date anniversary.
- 2. Process. All documents are to be submitted to the PO coordinator (502 FSS/FSR) to coordinate for approval.
- 3. Documents. The following documents must be submitted:
 - a. Balance sheet for the end of the fiscal year (Additional Resources)
 - b. Income and expense statement for the fiscal year (Additional Resources)
 - c. List of current elected officers (Additional Resources)
 - d. Copy of treasurer acceptance statement (Additional Resources)
 - e. Copy of current liability insurance certificate or waiver of insurance (*Additional Resources*)
 - f. Revised constitution and by-laws (update required every two years for recertification) (*Additional Resources*)
- 4. Exceptions: FUBUs and SFRG IFs will be exempt from reporting to the PO coordinator. FUBUs will comply with reporting requirements established in AFI 34-23. SFRG IFs will comply with the reporting requirements established in AR 608-1, App J.
- 5. If any PO is not reporting compliant, the organization will not be considered current and as such will not be authorized to conduct fundraising events on JBSA. Continued delinquency will result in suspensions or dissolution but will be determined on a case-by-case basis.

CHAPTER 7 - TAX OVERVIEW

- 1. POs, FUBUs and SFRG IFs raising funds need to plan for taxes. Two tax concerns are particularly noteworthy: obtaining an Employer Identification Number and considering applying for tax-exempt status.
- 2. **Employer Identification Number** The activities are strongly encouraged to obtain an Employer Identification Number (EIN) from the Internal Revenue Service (IRS). The EIN should then be used on bank accounts, rather than any member's Social Security Number (SSN).
 - a. This avoids the IRS mistakenly considering any funds raised as the personal income of the member who used their SSN on the activity's bank accounts and other key financial documents.
 - b. Using SSNs leads to a common and unwelcome surprise. For example, say a PO volunteered to work concessions at several sporting events and earns \$10,000. The company that pays the \$10,000 will send the IRS a W-9 form detailing the payment. If the W-9 uses the PO Treasurer's SSN, then the IRS will consider that \$10,000 her personal income -- and expect her to pay around \$3,000 in extra tax on it! If the W-9 uses their EIN, then the IRS knows it's the PO's income.
 - c. The IRS has an online EIN application at: www.IRS.gov. The online application takes 5-10 minutes to complete and there is no charge. (There are many online vendors who claim to help you obtain an EIN . . . but charge hundreds of dollars for something people can easily do themselves on the IRS' free site!) The IRS will also accept applications by fax or mail using the simple one-page IRS Form SS-4.
- 3. **Tax Exempt Status** *Tax-exempt status is not automatic* -- even for POs, FUBUs and SFRGs doing very charitable things across the installation. Rather, the activity will need to apply for tax-exempt status to obtain the benefits of not paying taxes on the funds they raise, for POs, being able to hold raffles (since Texas limits those to 501(C) activities) and other advantages.
- 4. Most activities are eligible for tax-exempt status. There are many tax-exempt categories, but most activities fall within one of three:
 - a. **Section 501(c)(3):** *Charitable Organizations* This is the narrowest of tax-exempt purposes and few JBSA activities will qualify. It is meant exclusively for charitable purposes -- serving only public interests, not private interests. A common example is are spouses' clubs' scholarship funds. 501(c)(3) status confers two major benefits: donations are tax-deductible for donors, and some charitable foundations will only give to 501(c)(3) organizations.
 - b. **Section 501(c)(4):** *Social Welfare Organizations* Professional Military Organizations like a Chiefs' Group, Company Grade Officers' Council, Rising 6 are typical good candidates for this category. The key is that the activity must operate

primarily to further the common good and general welfare of the people of the community.

- c. **Section 501(c)(7):** *Social and Recreation Clubs* Many activities can qualify for this status. It is very broad and available to activities organized for pleasure, recreation, and other nonprofitable purposes like personal contact, commingling, and fellowship.
- 5. If activities desire tax-exempt status, they apply to the IRS. Some activities choose to hire CPAs or other tax experts to help with filing, while others apply on their own using the helpful guidance on the IRS website and charity support resources. Once the IRS has granted tax-exempt status, the activity can file that with Texas for immediate state tax-exempt status as well.

CHAPTER 8 - DISSOLVING A PRIVATE ORGANIZATION

When an activity decides to disband or shut down, it must:

- 1. Use its funds to satisfy any outstanding debts, liabilities or obligations. Any unpaid obligations remain the responsibility of the PO or UA members.
- 2. Dispose of the residual balance as decided by the membership.
- 3. Activity officers or points of contact must notify 502 FSS/CL of their intent, in writing, to dissolve the activity and must prepare a time-phased action plan to do so (*Additional Resources*).

CHAPTER 9 – FREQUENTLY ASKED QUESTIONS

Q: How long is the PO authorization good for?

A: The initial PO authorization to operate on JBSA is good for two years. The PO must then recertify at least every two years after in order to maintain authorization status. Failure to recertify automatically 'dissolves' the PO.

Q: What is / constitutes a fundraiser?

A: A fundraising event is a function where an organization performs a service or provides goods in order to make a profit. This includes where specific prices are asked, as well as where simply donations are accepted. A fundraiser may last a single day (e.g. bake sale) or could last several days (e.g. silent auction). Each event will be reviewed by the 502 FSS/CL and will be considered on a case-by-case basis.

Q: Where can we hold our fundraiser?

A: Any space that your command determines to be "away from the workplace" is usually fair play (for example, base quarters, chapels, Commissary, entrances, lobbies or concourses of buildings, schools, MWR/FSS facilities, the Exchange system). Fundraising in the workplace (examples include flight lines, hangars, labs, offices) is authorized only during the Air Force Assistance Fund, Army Emergency Relief and Combined Federal and Navy-Marine Corps Relief Society campaigns. Fundraising guidance for the Combined Federal Campaign has changed.

Q: Can our organization hold a raffle?

A: Yes (POs only), but in accordance with AFI 34-223, a PO must comply with applicable state law. In the state of Texas raffles are considered gambling and are only authorized to a select amount of organizations (whom are all registered non-profits (501(c)) and are limited to two per year.

Q: Are door prizes considered raffles?

A: No, door prizes are allowed. As each individual entering the room has an equal chance of winning there is no gambling aspect. However, you may NOT sell additional chances to individuals on top of any original entrance fees.

Q: We are having a unit picnic this month. Can our organization sell alcohol at the function as a fundraising event?

A: The answer is a resounding, NO! A PO may not sell nor serve an alcoholic beverage under any circumstance.

Q: What are some of the dos and don'ts as we plan and conduct our fundraising events?

A: While the types of event, time of year, and many other factors have an effect on this response, some baseline things to remember are:

- (1) Know the regulations before using government email
- (2) Do not use government time, resources or titles in association with your event
- (3) Do not solicit on the installation

- (4) If you wish to solicit off-base, please consult with the 502 FSS/FSR private organization coordinator or 502 FSG/JA before sending any information or requests to local business
- (5) Never promise an outside entity to advertise their business in any form of printed media during your event in order to obtain donations. This is considered sponsorship and is strictly prohibited by private organizations.
- (6) Events selling military "dress down" days and auctioning parking spaces are PROHIBITED!
- Q: We have a unit snack bar. Is this legal?
- A: Unit snack bars must be unmanned, for donations only and authorized by your CC to use any significant office space. Recommended "donation" prices may be posted, however the mark-up to these items must be MINIMAL (pennies on the dollar). Snack bars are to be in place only as a convenience to the individuals in your area and should not be open to the public. All continuous resale activities are exclusively owned by FSS and AAFES. POs are strictly prohibited from any type of competition with these activities.
- Q: Our PO/FUBU/FRG IF would like to put a collection box in our foyer to collect clothing for a charity. Are we required to submit a fun raising request form for this function?
- A: No. Per the Air Force General Council, collection boxes are not considered to be fundraising events and may be approved directly by the installation commander. JBSA has a single-page request form for this purpose. Actual cash/check/gift cards may NOT be solicited or accepted in association with these events.

Additional Resources

Other useful resources are located at www.jbsatoday.com. These resources include:

- Sample Constitution & Bylaws for Private Organizations
- Elected Officers Listing
- Treasurer Acceptance Statement
- Request for Waiver of Insurance Requirement
- Dissolution Statement
- Financials Template
- JBSA Fundraising Request Form
- Family Readiness Group Registration