

# DEPARTMENT OF THE ARMY INSTALLATION MANAGEMENT COMMAND HEADQUARTERS, UNITED STATES ARMY GARRISON-DETROIT ARSENAL

6501 E. ELEVEN MILE ROAD WARREN MI 48397-5000

#### IMMI-MW

MEMORANDUM FOR All Detroit Arsenal Assigned and Attached Personnel.

SUBJECT: Installation Policy 600-29, Fundraising Activities

## 1. REFERENCES.

- a. 5 CFR Part 950, Solicitation of Federal Civilian and Uniformed Service Personnel for Contributions to Private Voluntary Organizations, Oct 2015.
- b. DoD Directive 5500.7-R, Joint Ethics Regulation.
- c. AR 600-29, Fundraising within the Department of the Army, 1 Jun 2001AR 165-1, Chaplain Activities in the United States Army, 23 Jun 2015.
- d. AR 210-22, Private Organizations on Department of the Army Installations, 22 Oct 2001.
- e. AR 215-1, Administration of Army Morale, Welfare, and Recreational Activities and Non-Appropriated Fund Instrumentalities, 15 Aug 2005.
- f. AR 600-20, Army Command Policy, 6 Nov. 2014.
- g. AR 930-4, Army Emergency Relief, 22 Feb 2008.
- 2. PURPOSE. Provide policy direction for all fundraising activities on the Detroit Arsenal and off-post leased facilities. NOTE: Fundraising is defined as any activity conducted for the purpose of collecting money, goods, or other support for the benefit of others (reference 1a above).
- 3. APPLICABILITY. This policy applies to all personnel under the operational control on the Detroit Arsenal, to include personnel in off-post leased facilities.
- 4. POLICY.
  - a. Authorized Fundraising Activities.

SUBJECT: Installation Policy 600-29, Fundraising

- (1) <u>Combined Federal Campaign (CFC)</u>. Fundraising through on-the-job solicitations is authorized in support of voluntary health, welfare, and philanthropic organizations where members of the general public are the beneficiaries of the programs. The CFC is the only fundraising for the general public which may be conducted by the Army pursuant to AR 600-29. In addition, support of an emergency or disaster appeal which has been given specific prior approval by the Director of the Office Personnel Management (OPM) may also be conducted.
- (2) <u>In Support of the Uniformed Services</u>. Fundraising conducted by members of the uniformed services among their own members for organizational support or for the benefit of welfare funds for their members is authorized. The Army Emergency Relief (AER) campaign is the only such fund-raising which may be conducted by the Army in accordance with AR 930-4 and AR 600-29.

# (3) Local.

- (a) Fundraising in support of installation <u>Family and Morale, Welfare and Recreation</u> (FMWR) activities as provided in AR 215-1, e.g. fund-raising in support of Organization/Appreciation Day.
- (b) Pursuant to AR 210-22 and AR 600-29, Organizations composed primarily of DOD employees and/or their dependents may fundraise among their own members, for the benefit of its members and/or their dependents, when approved by the commander who consults with the ethics advisor before making a decision about approving the fundraiser. At the discretion of the installation commander, in consultation with the ethics advisor, approved on-post Private Organizations may engage in occasional fund-raising and conduct nonprofit resales when sales are not in competition with the Army and Air Force Exchange Service or installation NAFIs.
- (c) Provided no on-the-job fundraising is involved, and the fundraising is for goods/merchandise only (not cash), the Garrison Manager may authorize limited fundraising activities to assist the unfortunate. These activities may include the use of "poppies" or other similar tokens by Veterans' Organizations, or the placement of collection boxes in public use areas of federal buildings or installations for the voluntary donation of foods or goods for charitable causes.
- (d) Fundraising by religious organizations or their affiliates is authorized only in connection with <u>religious services</u> and must be conducted per AR 165-1.
- b. Informal Fundraising Activities. Generally, office parties are unofficial events; therefore, appropriated funds may not be used to pay for them. Often times a government agency will seek to defray the cost of a holiday party by engaging in some type of fundraising. Very specific rules and procedures apply in these circumstances.
  - c. The general rule is "no fundraising in the federal workplace." However an

SUBJECT: Installation Policy 600-29, Fundraising

exception exist for office events (such as holiday parties) if the money is to be raised only from among the member of the group for their own benefit <u>and</u> when approved by the commander or (his or her designee) after consultation with ethics advisor.

- d. Examples of informal Fundraising are Pizza, Bagel sales in support of holiday parties, coffee funds, cup and flower, annual picnic; these are authorized with written approval as outlined on (Appendix A). This allows an office/organization to have an informal fund which net worth does not exceed \$5000; these fund are subject to the requirements of AR 210-1, paragraph 2-2. These Informal fundraising activities are subject the following guidelines:
- (1) No on-the-job (during duty time) fundraising is permitted. Fundraisers must be conducted during break or lunch time, or leave must be taken.
- (2) Food item fundraisers are not to be advertised outside of a division's own area and sales should be limited to co-workers in that division (although sales may be made to anyone who stops by). Food sales will not be permitted in main halls and must remain in office area of requesting office.
- (3) Homemade dishes and food requiring preparation on site (hot dogs, hamburgers, chicken) by Detroit Arsenal employees is prohibited.
- (4) Fundraising will be limited to 1 physical location per event, and no more than 2 fundraising events will be scheduled in any calendar week throughout the installation.

**NOTE**: Fundraising activities for organizations other than the CFC and AER will not be conducted during conflicting periods, nor will those events or activities in any way substantially interfere with the authorized annual CFC or AER fund drives. Please contact the Chief, Recreation Division {(CRD) see Proponent, below} to de-conflict dates.

- e. Voluntary Giving/Preventing Coercive Activity. True voluntary giving is fundamental to any fund-raising activities conducted within DA. Each military and civilian member has the right to give or not give as the individual so chooses. Each employee shall reserve the option of disclosing his/her contribution or keeping it confidential. Any campaign or fundraising practice that involves compulsion, coercion, or other action that is contrary to the concept of true voluntary giving is prohibited.
- f. Official Endorsements. DA officials may officially endorse only the CFC, other fundraising specifically approved by the Director of OPM, the AER campaign, and local fundraising on behalf of Army FMWR non-appropriated fund instrumentalities. DA officials may not endorse other local fundraising authorized under the provisions of AR 210-1 or AR 165- 1 on behalf of a particular private organization.

SUBJECT: Installation Policy 600-29, Fundraising

## 5. PROCEDURES.

- a. Individuals/Organizations Seeking Approval to Raise Funds. Shall complete request form Appendix A and send to <a href="mailto:usarmy.detroit.imcom-central.mbx.fundraiser@mail.mil">usarmy.detroit.imcom-central.mbx.fundraiser@mail.mil</a> or by hardcopy to IMMI-MWR, MS 603 NLT 10 days prior to the start of the fundraiser.
- b. After reviewing request, the NSSD will approve or forward it to the Legal Office for an advisory opinion. Based on the opinion received, the NSSD will make a recommendation to the Deputy Garrison Manager (or their representative) for approval/disapproval to the requestor.
- c. Legal Office. Will provide a review, and advisory, of any fundraising requests that there are concerns with when forwarded by NSSD.
- d. USAG-DTA Garrison Manager (undersigned) or the Deputy Garrison Manager will approve/disapprove requests and reply to the requestor.
- 6. PROPONENT. USAG-DTA CCR of the Garrison, IMMI-MWR, MS 603, 6501 E. Eleven Mile Road, Warren, MI 48397-5000.
- 7. RECISION. Policy Memorandum #37, Fundraising Activities, dated 23 January 2012.

Encl

1 – Fundraising Request Form

Joseph Moscone Garrison Manager

SUBJECT: Installation Policy 600-29, Fundraising

# Appendix A – Fundraising Request Form

Provide information below and forward through your immediate supervisor to mailbox via email: usarmy.detroit.imcom-central.mbx.fundraiser@mail.mil or interoffice mail: IMMI-MWR, MS 603.

- 1. Date of Request:
- 2. Name of the Individual or Organization:
- 3. Address or Organization Office Symbol (with Mailstop) and Telephone Number:
- 4. Benefiting Organization/Foundation/Individual:
- 5. Type of Goods/Merchandise Collected (cash fundraising will not be authorized):

Only Food and Beverages from an approved vendor will be permitted to be sold on installation.

Please list where will items be purchased from?

Please list where will items be purchased from? Will they be picked up or delivered?

6. Proposed fundraising event:

Location (limit 1 location):

Date:

Time:

- 7. Special Facility Requirements/Location of Fundraiser:
- 8. Accountability and Safeguarding of Collections:
- 9. Marketing Plan shall not consist of the use of government furnished equipment: this includes legal, audit, transportation, postal, printing, information management activities, clerical, financial, copying, management, and procurement services.
- 10. Fundraiser is a CFC Agency/Organization Yes or No:
- 11. Will this fundraiser raise more than \$5,000 for an informal fund? Yes or No:
- 12. Informal Funds:
  - a. Individual Responsible:
  - b. Supervisor:

SUBJECT: Installation Policy 600-29, Fundraising

- c. Business Center Head/Commander:
- 13. No on-the-job (during duty time) fundraising is permitted. Fundraisers must be conducted during break or lunch time, or leave must be taken. IMMI-MW SUBJECT: Policy Memorandum #37, Fundraising Activities 6
- 14. Food item fundraisers are not to be advertised outside of a division's own area and sales should be limited to co-workers in that division (although sales may be made to anyone who stops by). Food sales will not be permitted in main halls and must remain in office area of requesting office
- 15. Homemade dishes and food requiring preparation (hot dogs, hamburgers, chicken) by employees are prohibited.
- 16. Fundraising will be limited to 1 physical location per event, and no more than 2 fundraising events will be scheduled in any calendar week throughout the installation.

Joseph Moscone Garrison Manager