



Fundraising do's and don'ts

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10/2/2015 - **RAF MILDENHALL, England** -- With the holidays right around the corner, fundraising for private organizations is on the rise. Fundraisers such as bake sales, car washes and food booths at base events are a great way for private organizations to raise money.

However, the rules on fundraising are restrictive and can be difficult to navigate. Following the appropriate legal guidance will help ensure a successful fundraising season.

The process begins and ends with the 100th Force Support Squadron. Private organizations submit requests to the 100th FSS, which routes them for review and approval. The 100th Air Refueling Wing Legal Office conducts a legal review of all fundraisers and makes a recommendation to the 100th FSS commander, who then makes the final decision on the fundraiser.

A private organization or unofficial activity may not advertise events until granted approval. Private organizations may engage in no more than two fundraising events per quarter.

Fundraising activities are subject to the following limitations according to the Joint Ethics Regulation and Air Force Instruction 34-223:

- a. Fundraising activities may not be conducted by military members or civilian employees during their duty time. Military members may not engage in fundraising activities while in uniform.
- b. Government materials or email may not be used to support fundraising.
- c. The following disclaimer must be provided in all communications per AFI 34-223, Section 10.1, "This is a private organization. It is not a part of the Department of Defense or any of its components and it has no governmental status."
- d. Private organization may accept gifts and donations, but may not solicit gifts or donations on base. Off-base solicitations must clearly indicate that they are for a private organization and not for the base or any official part of the Air Force.
- e. Fundraising activities may not duplicate or compete with the Army and Air Force Exchange Services or a Non-appropriated Fund Instrumentality such as clubs, base restaurants or outdoor recreation.
- f. If the fundraiser involves food preparation, food handlers training must be obtained from public health. A copy of the training must be turned in with the fundraiser request.
- g. Fundraisers cannot involve games of chance, lotteries, raffles or other gambling-type activities. Exception: private organizations which are composed primarily of DoD personnel or their family members may conduct fund-raising raffles on an Air Force installation on an occasional, infrequent basis when authorized in advance by the installation commander or designee subject to the limitations.
- i. Fundraising during the Combined Federal Campaign and Air Force Assistance Fund are subject to more stringent requirements than fundraisers throughout the rest of the year and must be approved by the 100th ARW commander. For example, solicitation for a local internal program at the workplace such as a sunshine fund is not authorized.
- j. In general, DoD employees are prohibited from officially endorsing or appearing to endorse membership drives or fundraising for any nonfederal entity. The main exceptions are for CFC and AFAF, which can be officially endorsed. There is also a narrow exception for other organizations composed primarily of DoD employees or their dependents when fundraising among their own members for the benefit of welfare funds for their own members or their dependents when approved by the commander after consultation with the 100th ARW Legal Office. For example, a squadron private organization fundraiser can be advertised or endorsed

within the squadron, but not outside of the squadron as long as the fundraising is for the benefit of the squadron members and not for an external cause/charity.

k. Fundraising cannot be accomplished to augment items or activities typically funded by appropriated funds as this may amount to an Anti-deficiency Act violation. For example, fundraising to purchase work equipment, fund official travel, or to pay salaries is prohibited.

For more information, call the private organization coordinator at DSN 238-4834, commercial at 01638 544834, or the legal office at DSN 238-2028, commercial at 01638 542028.