

## DEPARTMENT OF THE ARMY US ARMY GARRISON CARLISLE BARRACKS 22 ASHBURN DRIVE CARLISLE, PENNSYLVANIA 17013-5000

AMIM-CLG-ZA 2 June 2021

MEMORANDUM FOR All Members of the USAG Carlisle Barracks Community

SUBJECT: Private Organizations

## 1. REFERENCES:

- a. DoDI 1000.15 (Private Organizations on DoD Installations), 24 Oct 08.
- b. DoD 5500.7-R (Joint Ethics Regulation), 17 Nov 11 (with changes 1-7).
- c. DoD Regulation 7000.14-R (Financial Management Regulation), Volume 13, July 13.
  - d. AR 1-100 (The Army Gift Program), 27 Jul 15.
- e. AR 210-22 (Private Organizations on Department of the Army Installations), 22 Oct 01.
- f. AR 215-1 (Military Morale, Welfare, and Recreation Programs and Nonappropriated Fund Instrumentalities), 24 Sep 10.
- g. AR 405-80 (Management of Title and Granting Use of Real Property), 10 Oct 97.
  - h. AR 600-29 (Fund Raising Within the Department of the Army), 7 Jun 10.
  - i. AR 608-1 (Army Community Service), 19 Oct 17.
- j. Carlisle Barracks Garrison Policy DFMWR Fundraising Activities on Carlisle Barracks.
- 2. PURPOSE: To set forth, in addition to the provision of AR 210-22 and other laws or regulatory sources, the requirements to operate private organizations (POs) on Carlisle Barracks.

## 3. POLICY:

a. Private organizations operating on Carlisle Barracks must comply with all requirements outlined in paragraph 1 above and any other laws or regulatory sources.

SUBJECT: Private Organizations

- b. The Carlisle Barracks Director of FMWR (DFMWR) will administer the program and maintain records and notify the Private Organization of issues and will review and monitor ensure compliance with regulation and policy.
- c. The POs are not Nonappropriated Fund (NAF) Instrumentalities and are not entitled to receive support from NAF.
- d. The PO endorsement is strictly prohibited by DoD 5500.7-R, Joint Ethics Regulation, 17 Nov 11.
- e. A Family Readiness Group (FRG) is an official Army entity, not a PO. Individuals independent of the FRG may establish a PO to support shared goals and objectives. Such a PO may not receive special treatment. To prevent potential conflicts of interests, if such POs are established, PO board members/leaders may not also be FRG leaders. The FRG must remain separate and apart from any PO fundraising effort. Contact the Staff Judge Advocate (SJA) for guidance on the proper relationships between FRGs and POs affiliated with units.
  - f. The Directorate of Family and Morale, Welfare, and Recreation (DFMWR) will:
- (1) Provide guidance to individuals desiring to establish a Carlisle Barracks PO. Request an SJA legal opinion on PO's constitution and bylaws via e-mail. Prepare a PO notification letter permitting them to operate two (2) years on Carlisle Barracks.
- (2) Monitor POs operating on Carlisle Barracks to ensure they meet all requirements timely. The PO Coordinator will inspect all POs annually.
- (3) Maintain a DFMWR-managed carlisle.armymwr.com site providing a single source of required documents and references including regulations, policy memorandums, and PO guides.
- (4) Will provide an approval document for all fund raisers to show proof that the fund raiser has been approved. PO will have document available for inspection if needed.
  - g. The Garrison Commander (GC) will:
    - (1) Approve all POs to operate upon the installation.
- (2) Send termination-warning letters to POs who do not timely comply with requirements.
- (3) Send revocation letters revoking the PO operating permit and their installation operations for failing to timely comply with requirements.

SUBJECT: Private Organizations

- (4) Suspend PO fundraising activities for six (6) months for operating a fundraiser without a permit (first offense).
- (5) Suspend PO fundraising activities for overdue audits until the PO provides proof the audit was performed.
- (6) Provide copies of suspension, and revocation letters to the Chief of Staff, the Inspector General (IG), and the associated subordinate commander.
  - h. Private organizations will:
    - (1) Exist to enhance community activities for Soldiers, Families, and civilians.
- (2) Provide DFMWR a signed copy of constitution and bylaws and any changes as they occur.
- (3) Contact the DPW Realty Property Officer, if PO wants to use government buildings and/or land. The Realty Property Officer will determine if a real estate lease or license is required. If so, PO will submit a request to them for it. Upon receiving the lease or license, provide DFMWR a copy.
- (4) Raise funds only IAW AR 600-29 and Carlisle Barracks Garrison Policy DFMWR Fundraising Activities on Carlisle Barracks,
- (5) Provide DFMWR a list of officers including their name, phone number, and e-mail address.
- (6) Submit quarterly financial reports and bank statements (including zero or negative balances) to DFMWR. Report will include all revenue streams, e.g. gift cards.
  - (7) Submit meeting minutes as they occur, or at least annually, to DFMWR.
- (8) All POs with gross revenue of \$1,000 or more will complete a financial audit every two (2) years on a specific date. First audits are due on 1 March 2022 for calendar years 2020 and 2021. The next audit due will be 1 March 2023 for calendar years 2021 and 2022 and so on, etc.
- (9) Private organizations will furnish an audit when the PO treasurer changes, regardless of when it falls during the two (2) year audit timeframe. This does not preclude the PO from furnishing DFMWR with audits listed in paragraph 8.
- (10) Audits may be conducted by a committee of three (3) PO members who hold no office, or by a qualified auditor.

SUBJECT: Private Organizations

- (11) If PO bank account contains \$500 or more, provide DFMWR proof of Bond insurance, from a reputable insurance company, or companies, including a copy of policy's declaration page and the insurance premium payment receipt.
  - i. Private organizations will not:
- (1) Use Soldiers in uniform to support POs, e.g., setting up fundraiser site, moving resale merchandise from storage to the sell site, guarding items, etc.
  - (2) Deposit FRG funds into the PO checking account.
  - (3) Duplicate other DFMWR or AAFES activities.
- (4) For POs with one Vice-President, allow the President or Vice-President to sign negotiable instruments and possess a debit card issued on the PO checking account. Also, these officers cannot serve as petty cash fund custodians.
- (5) For POs with two or more Vice-Presidents, allow the President or First Vice-President to sign negotiable instruments and possess a debit card issued on the PO checking account. Also, these officers cannot serve as petty cash fund custodians.
- j. The Joint Ethics Regulation, DoD 5500.7-R, paragraph 3.2, identifies certain permissible installation PO support if the following circumstances exist as determined by the Garrison Commander or Commanding General and the event is not a membership drive or fundraiser.
- (1) Support does not interfere with Carlisle Barracks mission and in no way detracts from readiness.
- (2) Community relations interests, public affairs interests, and military training interests are served by the support.
  - (3) Associating the Army and Carlisle Barracks with the event is appropriate.
- (4) The event is of interest and benefit to the local Civilian community or Carlisle Barracks.
- (5) Carlisle Barracks is able and willing to provide the same support to comparable events, sponsored by other similar POs.
  - (6) The support is not prohibited by other laws or statutes.
- (7) No admission fee (beyond event sponsoring costs) is charged for the event or for the portion of the event sponsored by Carlisle Barracks.

AMIM-CLG-ZA

SUBJECT: Private Organizations

- k. Certain activities conducted during PO-sponsored events are permissible only when monitored/conducted by DFMWR.
- (1) The POs may not dispense or sell alcoholic beverages during events. Army Regulation 215-1 prohibits POs from selling or dispensing alcohol.
- (2) The POs may not seek commercial sponsorship. Only the DFMWR is authorized to seek commercial sponsorship. Military units and on-post government organizations may not solicit donations of goods, money, or services from commercial sources including Commissary and other on-post resources for any reason (DoD 5500.7, AR 1-100, and AR 215-1).
- I. The POs are included as a Staff Inspection Program (SIP) functional area. The PO/Fundraising Coordinator will inspect POs during the SIP and all other areas, at least annually to ensure compliance with regulation and policies. The PO/Fundraising Coordinator reports inspection results to the major subordinate commander and also integrates results into the DFMWR PO Management Program Checklist.
- 4. SUPERSESSION: This policy memorandum supersedes any and all previously issued policy memorandum pertaining to its subject matter.
- 5. POC: Barry Main, NAF Support Manager, 717-245-4332, barry.d.main.naf@mail.mil AUTHORITY LINE:

COURTNEY A. SHORT COL, AD Commanding