

DEPARTMENT OF THE ARMY U.S. ARMY INSTALLATION MANAGEMENT COMMAND HEADQUARTERS, UNITED STATES ARMY GARRISON FORT HAMILTON 113 SCHUM AVENUE BROOKLYN NEW YORK 11252-5000

AMIM-HAG-ZA 18 July 2024

MEMORANDUM FOR United States Army Garrison (USAG) Fort Hamilton

SUBJECT: USAG Fort Hamilton Policy Letter #22 - Fundraising Activities on Fort Hamilton Policy for U.S. Army Garrison, Fort Hamilton, NY

1. References:

- a. DoD Directive 5500.7 (Joint Ethics Regulation), 15 May 2024.
- b. AR 210-22 (Support for Non-Federal Entities Authorized to Operate on Department of the Army Installations), 12 May 2022.
- c. AR 215-1 (Military Morale, Welfare, and Recreation Programs and Nonappropriated Fund Instrumentalities), 24 September 2010.
 - d. AR 1-10 (Fundraising Within the Department of the Army), 16 December 2022.
 - e. AR 608-1 (Army Community Service), 19 October 2017.
 - f. Fort Hamilton Garrison Policy #31 (Private Organizations), 14 JUL 2022.
 - g. Chapter 59 of the 2017 Laws of New York, Part "MM" (Charitable Gaming Laws)
- 2. Purpose. To provide requirements to conduct fundraising activities on Fort Hamilton.

3. Policy:

- a. Fundraising requests require prior Directorate of Family and Morale, Welfare, and Recreation (DFMWR) approval except for the Combined Federal Campaign (CFC) conducted in the fall and the Army Emergency Relief (AER) Fund Campaign in the spring. Any Non-Federal Entity (NFE) (previously referred to as Private Organizations (PO)), Family Readiness Group (FRG), or any other activity requesting to fundraise must have a copy of their DFMWR fundraising approval letter on hand when conducting their fundraising events.
- b. NFEs found violating fundraising policies may result in future fundraising requests denials or installation permit suspension/revocation by the Garrison Commander (GC). The DFMWR will provide suspension/revocation letter copy to the Chief of Staff and associated unit commander. If a NFE conducts a fundraiser without

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DFMWR approval, the penalty for the first offense is a six-month suspension. If the second offense occurs within a 12-month period, the GC will suspend the NFE's authorization to operate on Fort Hamilton. A NFE's fundraising activities will be suspended for overdue audits and will not be restored until the NFE provides DFMWR proof that a satisfactory audit was performed.

- c. Child and Youth Services' (CYS) cheerleading squads/sports teams may raise funds for a team banquet and trophies. Funds raised are limited to \$25 per individual (players, coach, and team parent). The team's head coach will submit a financial statement to the CYS Sports Director for approval no later than 1600 the first Wednesday following each team's last game of the season.
- d. Fundraising activities will not duplicate services AAFES or DFMWR provides, e.g., t-shirts, car washes, unless AAFES and/or the DFMWR, as appropriate, concur.
- e. The Garrison Commander is the approval authority for fundraising that occurs outside a unit or organization's area of control or that occurs in a garrison's publicly accessible areas, such as events at a commissary or military exchange. These fundraising 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 in-kind items for charitable causes.
- f. NFEs and FRGs are limited to no more than eight (8) fundraisers in a calendar year beginning 1 January. NFEs and FRGs providing a service to the community or Family Members, e.g., for unit graduations, may request an exception. Written request justifying the exception must be approved by the DFMWR.
- g. Only MWR Tickets and Travel may sell tickets on post to off-post commercial events. With advance authorization, Boy/Girl Scouts and NFEs may sell tickets on post to their own organization's off-post activities.
- h. Raffles are prohibited fundraisers on Fort Hamilton; however, the GC may grant an exception based on extenuating circumstances and Staff Judge Advocate's legal opinion. The NFEs must submit exception to policy requests through the DFMWR to the GC. The requests must include:
- (1) A copy of the NFE's 501(c) status from the Internal Revenue Service. The PO must have maintained 501(c) status for at least two (2) years.

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- (2) Proof of incorporation by the State of New York affirming the NFE is authorized to operate in the State of New York.
- (3) Documents regarding State of New York laws and local City of New York requirements. (AR 215-1)
- i. An FRG may officially fundraise from its own community members or dependents. Fundraising must be in the unit area, for the organization's informal fund, as opposed to a private charity, a particular military member, or a similar case, and have the unit commander's approval. In some instances, a FRG may benefit people outside its membership in which case the DFMWR may grant the FRG an exception to fundraise in those areas. The FRG must submit a written request for exception along with a justification. The FRG will refer to its Standard Operation Proceedure (SOP), approved by the commander, for guidance on raising and expending funds. Commanders will consult with their SJA to ensure compliance with regulations and policies and to avoid conflicts with other authorized fundraising activities before the FRG submits a written request to the DFMWR.
- 4. NFEs and FRGs must provide fundraising requests to DFMWR no less than 14 working days before the event. NFEs must not use official Army letterhead stationery to type the requests. FRGs must use the company letterhead on all their fundraising requests. E-mail requests to trevor.m.loew.naf@army.mil or deliver to Mr. Loew at DFMWR, 404 Sterling Drive, M-F, 0800-1700. Include the following information in requests:
 - a. Name of organization requesting to fundraise.
 - b. Purpose of fundraiser.
- c. Date, time, and specific location (specify name and phone number of individual who approved the location for the fundraiser).
 - d. Description of fundraiser.
- e. A statement that the NFE or FRG will deposit funds raised into its account and show the income as a separate line entry on the NFE's financial statement provided to DFMWR.
 - f. Name, address, and phone number of the NFE's/FRG's point of contact.

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- 5. The DFMWR PO/Fundraising Coordinator will inspect NFEs and their fundraising activities, e.g., meeting minutes, financial statements, bank statements, permits to operate annually to ensure compliance with regulations and policies.
- 6. NFEs and their fundraising activities will be included as a Staff Inspection Program (SIP) functional area. During the unit SIP, DFMWR PO/Fundraising Coordinator will inspect the NFEs operating in unit areas for compliance with regulations and policies at least annually. The PO/Fundraising Coordinator reports SIP results to the major subordinate commander and integrates results into DFMWR's Management Control Program.
- 7. Supersession. This policy memorandum supersedes any and all previously issued policies memorandum pertaining to its subject matter.
- 8. Proponent. The POC for this policy is Mr.Trevor M. Loew, PO/Fundraising Coordinator, DFMWR, 718-630-4771, or at trevor.m.loew.naf@army.mil.

MELISSA M. CANTWELL

COL, MP Commanding