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HEADQUARTERS, 25TH INFANTRY DIVISION AND U.S. ARMY HAWAII
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APVG-CG

8 February 2021

MEMORANDUM FOR RECORD

SUBJECT: United States Army Hawaii (USARHAW) Policy Letter #21 – Soldier and Family Readiness Group Fundraising

1. References:

a. Army Regulation (AR) 600-29, Fundraising Within the Department of the Army, 07 June 2010.

b. AR 608-1, Army Community Service, 19 October 2017.

c. DoD 5500.07-R, The Joint Ethics Regulation (JER), 17 September 2011.

d. U.S. Army FRG Leader's Handbook, Fourth Edition, 2010.

e. AR 1-100, Gifts and Donations, 7 February 2019.

f. AR 600-20, Army Command Policy, 6 November 2014.

2. Purpose. To explain the proper procedures and limitations associated with fundraising by Soldier and Family Readiness Groups (SFRGs) operating on USARHAW installations.

3. Applicability. This policy applies to all SFRGs associated with any unit on a USARHAW installation.

4. Policy. There is no "right" to fundraise on an Army installation. All fundraising on post, aside from those events associated with the Combined Federal Campaign (CFC), must be approved by the Garrison Commander. Approval authority is delegated by the Garrison Commander to the Directorate of Family and Morale, Welfare, and Recreation (DFMWR). Family Readiness Group fundraising must be approved by a SFRG's respective unit commander prior to approval by DFMWR.

a. Frequency. Only occasional fundraising in support of SFRGs is authorized. Unit commanders and the Garrison Commander shall determine the appropriate frequency of these events. All fundraising must be limited in number and scope during CFC periods.

b. Family Readiness Group Informal Funds.

(1) Family Readiness Group fundraising must be for the benefit of a SFRG's "informal fund" as opposed to a private charity or other cause.

(2) A SFRG, if given approval from by the unit commander, may establish one informal fund in a non-interest bearing account (at a financial institution). The unit commander will authorize opening the account and prepare a letter naming the fund's custodian, with a named alternate, as persons authorized to sign checks drawn on the account. The commander will not be a signatory on the account. Monies in this account may not be comingled with personal funds, Morale, Welfare, and Recreation (MWR) funds, unit informal funds, or any other type of funds.

(3) The SFRG's unit commander will designate a fund custodian (treasurer) and an alternate. The custodian and alternate must not be the unit commander, should not be a deployable Soldier, nor the SFRG leader. The custodian will be responsible for custody, accounting, and documentation of the informal fund. The SFRG informal fund custodian and alternate are personally liable for any loss or misuse of SFRG funds.

(4) Reports. The fund custodian will provide informal fund reports to the unit commander monthly and as requested. An annual report on the SFRG informal fund activity will be provided to the first colonel (O-6) commander or designee in the unit's chain of command no later than 30 January. Reports will summarize the informal fund's financial status, to include current balance, total income, and an itemized list of expenditures along with an explanation showing how the expenditures are consistent with the purpose of the SFRG informal fund purpose.

(5) All SFRG informal funds must have an approved standard operating procedure (SOP) signed by the unit commander and approved by a majority of its members documenting the purpose of the particular fund, its functions, and a summary of its routine activities (See Reference 1b, Appendix J). A SFRG informal fund SOP must contain the following statement: "this SFRG informal fund is for the benefit of the SFRG members only and is established exclusively for charitable purposes and to provide support to Soldiers and Family members as the Soldiers and Families adapt to Army life. It is not a business and is not being run to generate profits. It is not an instrumentality of the United States Government." An informal fund may only be established and maintained for purposes consistent with its written SOP.

(6) All SFRGs that maintain an informal fund will also maintain an "informal fund ledger" reflecting the costs of each expenditure.

(7) Soldier and Family Readiness Groups operating on USARHAW installations have an informal fund annual income cap of \$5,000.00 which must never be exceeded.

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This amount may be lowered by a SFRG's unit commander in his/her discretion. Generally, all SFRG funds should be earmarked in advance for a specific planned event/purpose.

(8) Unsolicited gifts or donations of money or tangible personal property valued at \$1,000.00 or less may be accepted by a unit commander as gifts to a SFRG informal fund. A legal review must be obtained for any gifts prior to acceptance.

c. Authorized Uses of SFRG Informal Funds. Purposes related to "family readiness" are authorized, such as: purely social activities/outings (births, birthday parties, member welcome/departing parties, holiday parties, etc...); volunteer recognition (not otherwise funded with appropriated funds); SFRG newsletters containing predominantly unofficial information; and purchasing refreshments for SFRG meetings.

d. Unauthorized Uses of SFRG Informal Funds. Augmenting unit informal funds; paying for items that are authorize to be paid for with appropriated funds; paying for traditional military gifts like farewell gifts; funding unit balls; and, on USARHAW installations, funding child care for unit personnel or SFRG members are examples of improper SFRG funds expenditures.

e. Fundraising Procedures.

(1) Family Readiness Groups are allowed to fundraise from "within the local Army community." This includes fundraising amongst Service members, DoD employees, and dependents residing on installations. Family Readiness Groups may not conduct fundraisers off post or ever solicit DoD contractor personnel.

(2) Soldiers participating in fundraising for a SFRG may not be in uniform. If they fundraise during the duty day they must be in a pass or leave status.

5. This memorandum supersedes previous versions and remains in effect until superseded or rescinded in writing.

6. The proponent for this policy is the Office of the Staff Judge Advocate (OSJA), Administrative Law Division, at 808-787-3069.



JAMES B. JARRARD
Major General, USA
Commanding