Department of the Army
Headquarters, United States Army
Maneuver Support Center of Excellence
Fort Leonard Wood, Missouri 65473-5000

FLW Regulation 608-3

14 October 2026

Personal Affairs

LOCAL FUNDRAISING

FOR THE COMMANDER:
OFFICIAL:

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Summary. This regulation establishes policies, procedures, and responsibilities for the United States (U.S.) Army Maneuver Support Center of Excellence (MSCoE). This regulation prescribes the policies, procedures, and responsibilities for fundraising on Fort Leonard Wood (FLW).

Proponent and exception authority. The proponent for this regulation is the Directorate of Family and Morale, Welfare, and Recreation (DFMWR). The Garrison Commander (GC) is the exception authority.

Supplementation. Supplementation of this regulation is prohibited without prior approval by Headquarters (HQ), MSCoE.

Suggested improvements. Users are invited to send comments and suggested improvements on DA Form 2028 *(Recommended Changes to Publications and Blank Forms)* directly to G-37 (ATZT-OPS-DS), MSCoE, Fort Leonard, MO 65473-6650.

Distribution. Electronic medium only and posted on the FLW Web site.

*This regulation Supersedes FLW Reg 608-3, Dated 6 November 2017

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Chapter 1
GENERAL

1-1. Purpose

This regulation provides guidelines for the approval and conduct of fundraising on FLW. It is intended to govern the privilege of fundraising in a manner such that worthy causes can be supported while minimizing disruption of installation operations. Fundraising includes any activity conducted for the purpose of collecting money, goods, or other support for the benefit of others.

1-2. Acronyms and abbreviations

Special terms used in this regulation are explained in the glossary.

1-3. References

Required and related publications are listed in appendix A.

1-4. Applicability.

This publication applies to all civilian and military personnel assigned to and/or under the operational control of FLW.

a. Specifically, this regulation applies to –

(1) Commanders, supervisors, service members, civilian employees, contractors, family members, retirees, tenants, and any other individuals who seek to have events or raise money on FLW or seek to raise funds off FLW for a group or event associated with FLW.

(2) All members of Soldier and Family Readiness Groups (SFRG), informal funds, unit level nonappropriated fund (NAF) fundraising, office coffee funds, cup and flower funds, hail and farewell funds, holiday party funds, unit activity funds, annual picnic funds, and any other similar funds.

(3) The Garrison Commander (GC) is the approval authority for all FLW fundraising unless delegated further per this regulation. The DFMWR serves as coordinator for FLW SFRG fundraising requests.

b. This regulation does not apply to fundraising in support of Non-Federal Entities (NFEs) on FLW. NFE fundraising on FLW is governed by AR 600-29, Fund-Raising Within the Department of the Army, AR 210-22, Non-Federal Entities on Department of the Army Installations, and the installation Standing Operating Procedure for Providing Government Space and Equipment to Nonfederal Entities.

c. This regulation does not apply to fundraising by non-federal entities in buildings owned or leased by a non-federal entity, such as Parent Teacher Organization fundraising in the Waynesville School facilities, Red Cross and USO operations in the Red Cross and USO buildings; and the sale of goods by organizations on the installation authorized to conduct retail sales, E.g. the Thrift Shop and Museum Regimental Gift Shops. Fundraising that does not violate other rules (gambling restrictions, commercial solicitation, etc.) is also permissible in government quarters and privatized housing with the approval of the landlord. Rules on fundraising in the federal workplace are applicable to both contractors and Non-Federal Entities operating in the federal workplace.

d. Fundraising in support of Army Emergency Relief (AER) and the Combined Federal Campaign (CFC) must comply with the respective regulations and is not covered in this regulation.

e. Even though local fundraising rules may not apply to a particular fundraiser, federal and state tax laws will apply.

f. SFRG Funds and Cup & Flower Funds (informal funds) engaged in fundraising are encouraged to consult with the Internal Revenue Service and Missouri Department of Revenue regarding the applicability of taxes to their fundraising activities. Army attorneys cannot provide tax advice or prepare organization tax returns for any informal fund.

1-5. Provisions applicable to all fundraising

Other than fundraising for which official support is authorized, all fundraising support must be totally voluntary. No Soldier may be required to participate in other than official fundraising activities. Doing so violates the punitive provisions of the Joint Ethics Regulation (JER). Initial Entry Training (IET) Soldiers will not be used to support any fund-raising event.

a. Political Fundraisers. Political fundraisers are prohibited in all areas of the installation, including DFMWR facilities. Additionally, official endorsement or support of political fundraising is prohibited.

b. Commercial Fundraisers. Commercial organizations are not authorized to solicit or sell their goods on FLW, to include in government quarters and privatized housing, except in response to specific invitations from individuals located on the installation or as DFMWR or Army Air Force Exchange Service (AAFES) concessionaires, unless they have previously received a solicitation permit from the installation. Any commercial sales agent found on the installation without a valid solicitation permit is subject to removal and possible prosecution for trespassing. This restriction is not meant to prohibit sales in personal quarters of Scentsy, Tupperware, Pampered Chef, Mary Kay, and similar home-based business products when the salesperson has been invited to do so by the quarter's resident and has a current FLW solicitation permit. The GC may bar the sale of certain items or goods in personal quarters or home-based business products when they are deemed illegal or contrary to Army values. Commercial sales in privatized housing must be approved by subject property landlord (e.g., Balfour Beatty Communities) and registered as a Home-Based Business through DFMWR, per Army Directive 2018-29 and Fort Leonard Wood Garrison Policy #32.

c. Door-to-Door Sales. Commercial door-to-door sales to individuals in government quarters and privatized housing, as well as sales to individuals in the federal workplace, are generally prohibited.

d. National and Local Charities. Charitable organizations are entitled to apply to receive financial support from installation activities through the CFC. National and local charities are generally not authorized to have other fundraisers on the installation. Additionally, groups which are authorized to fundraise on the installation will not fundraise on the installation for funds to contribute to off-post organizations. There are two authorized exceptions:

(1) The sale of poppies and similar tokens in approved fundraising areas by veterans' organizations.

(2) The fundraising group is a local unit of a national nonprofit, and the group is composed primarily of Soldiers, civilian employees, and their family members fundraising for their morale purposes on the installation, during non-CFC and non-AER periods. For example, Scouting America

that is composed primarily of Soldiers' and civilian employees' children may seek approval to sell popcorn in an approved fundraising area when there is no conflict with CFC or AER. A troop that is not composed primarily of family members would not be authorized to do so. The GC may consider exceptions to policy in specific cases of merit, with concurrence from the installation's Ethics Counselor.

e. Nonmonetary Collection Efforts. The GC may authorize the collection of goods, other than money, to assist the unfortunate. If an organization wants to have a canned food drive, an angel tree, or similar collection, the applicable commander or director, subject to GC approval, may authorize it. Nonmonetary collections will be limited to placing a box or collection bin in a common area pre-approved by the commander or director as well as the concurrence of the building manager, if applicable. No government resources may be authorized to support the effort, and all contributions must be voluntary. Consultation with an Ethics Counselor is required.

f. Produce. Frequently, government employees with gardens/poultry will have an overabundant supply of squash, tomatoes, eggs, etc., and bring them into the office to give away. This will occasionally raise gift issues when a superior take some of the free food. So long as an employee is not in the business of selling produce, there is no prohibition against giving the produce away in the office. The preferred practice is that the employee giving away the produce place the produce out for anyone in the office to partake in on a first come, first serve basis. This will reduce, and in most cases eliminate, the appearance of a gift made to a superior.

g. Religious Fund-Raising. Fundraising by religious organizations or their affiliates is authorized only in connection with religious services and must be conducted per AR 165–1, Army Chaplain Corps Activities and AR 600-29.

h. Taxes. All organizations discussed herein are responsible for ensuring compliance with federal and state laws on sales taxes, income taxes, and any other taxes. FLW and Department of the Army accept no responsibility for an organization's noncompliance with any tax laws. Organizations seeking to sell goods or services to non-members of the organization may need to file a Form 990-T in addition to an annual return. It is recommended that organizations raising more than $1,000.00 in a year should contact the Internal Revenue Service and/or Missouri Department of Revenue as tax questions arise.

i. Paid Use of DFMWR Facilities. When an organization is having a function in or at an DFMWR facility, such as the bowling center, golf course, LORA, etc., and the organization is paying the fair market value rate for the use of the facility or contributing services in kind to fully offset facility costs, the use of the facility is not considered to be official support of the event in the facility. Additionally, mere incidental support to an event that is paying to use an installation DFMWR facility, such as use of a road or real estate for a "Run," does not rise to the level of official support. This rule applies even when the organization holding the event is charging more for participation than the event actually costs. However, rules on catering, signage, and commercial solicitation may be applicable to some events. Prior to approving such events, facility managers should coordinate with an Ethics Counselor in the Office of the Staff Judge Advocate to ensure the event will not violate the law, including restrictions on political fundraising or advertising restrictions on military property. Facility managers will coordinate with Public Affairs Office (PAO) on all requests to hold events of a political nature, including appearances by political candidates or elected incumbents.

j. Approved Fundraising Locations. All fundraising locations outside the immediate control of a commander or director must be pre-approved by the GC. The below listed locations are approved fundraising locations by the GC. Approval by other Department of Defense (DoD) officials may be

necessary depending on the location or type of fundraising. All fund raisers targeting the family members of IET Soldiers require GC approval regardless of location. Organizations may fundraise in the following locations after receipt of all required approval(s):

(1) AAFES facilities with the approval of the AAFES general manager.

(2) DFMWR facilities when approved by DFMWR.

(3) FLW Museum, when approved by the Chief, Museum Division.

(4) Non-work areas in the MSCoE Building and Building 470 when approved by the GC, in coordination with the facility manager.

(5) DECA (Commissary) facilities with the approval of the commissary general manager.

k. All fundraising organizations must have written approval prior to engaging in any fundraising activity. Approval documentation should be maintained at the fundraising site at all times. Approval to fundraise does not imply that your fundraiser will not raise issues of taxation if the targets of the fund-raising activity are non-members of the informal SFRG or cup & flower fund.

1-6. Restrictions applicable to all fundraising groups

The following restrictions apply to all groups fundraising on FLW--

a. Continuing resale operations are defined as regularly occurring sales of goods or services on post not affiliated with AAFES, the commissary, or nonappropriated fund activities. Authorized solicitations by individuals holding a post solicitation permit are allowed. Unless granted a specific exception, continuing resale operations are prohibited. These organizations, and any other organization approved to function on the installation, may not contribute any portion of their on-post sales proceeds to organizations not primarily composed of Department of the Army Soldiers, civilian employees, or their family members. Contributions to off-post charitable organizations, community organizations, and nonprofits are prohibited, because those organizations are not authorized to fundraise on FLW (other than thru CFC); and therefore, fundraising on their behalf on the installation by an approved organization is not allowed.

b. Groups will NOT seek donations from businesses but may accept unsolicited donations. Only the Installation Morale, Welfare and Recreation Fund (IMWRF) is authorized to solicit businesses for commercial sponsorship of DFMWR activities. Additionally, only DFMWR may enter into commercial sponsorship agreements. This is true even when a DFMWR activity or event is co-sponsored with another nonfederal entity. Solicitation by other groups on the installation inhibits the effectiveness of the DFMWR Commercial Sponsorship Program and violates the restriction on competition found in DODI 1000.15.

c. Groups, including cadre personnel, will not knowingly solicit any enlisted Soldier in an IET status or solicit in any training areas during training. TRADOC Regulation 350-6, Enlisted Initial Entry Training Policies and Administration, further provides:

(1) No cadre member [in or out of uniform] may sell any product, service, or opportunity to IET Trainees/Soldiers.

(2) No IET Trainee/Soldiers will be directed to participate in or purchase items at any authorized fundraising activities. IET Trainee/Soldiers will not be used to assist in set up or break down for SFRG activities.

(3) SFRG fundraising activities are only permitted in accordance with the references listed in appendix A of this publication. Note: Fundraising is only authorized for events included in the SFRG approved spend plan.

(4) IET Trainee/Soldier family members will not participate in unit SFRGs. Only assigned permanent party Soldiers and their spouse will engage in unit SFRG activities. IET Trainee/Soldier and families may create a conflict of interest or unauthorized relationships with command leadership. Family members may purchase items during [SFRG] fundraisers or be invited to events that support the SFRG fundraiser.

(5) This provision does not prohibit Trainee/Soldiers from voluntarily contributing to officially authorized campaigns (such as, CFC, AER, etc.) or making chapel offerings.

d. No fundraising is permitted during training unit family days or graduations except for approved SFRG fundraisers. Unit DFMWR fundraising and unit informal fund (i.e., cup and flower fund) fundraising are strictly prohibited at events involving IET Soldiers and their family members. Note: This does not restrict authorized retail sales by the museum regimental gift shops.

e. DODI 1000.15 prohibits competition with AAFES or the Installation Morale, Welfare, and Recreation Fund. Therefore, permission from DFMWR and AAFES is required for fundraisers that may compete with their businesses, including concessionaire businesses.

f. Groups will not engage in the sale or resale of alcoholic beverages.

g. Groups will not conduct raffles, opportunity drawings, lotteries, or any form of gambling prohibited by Missouri or federal law. Groups will not engage in bingo or other forms of entertainment requiring state licensure. Silent auctions and door prizes are permissible with appropriate approvals.

h. AR 600-29 prohibits all other charitable fundraising in the federal workplace during the CFC Campaign or the AER Campaign. Groups composed primarily of Soldiers, Department of the Army (DA) civilians, and their family members fundraising on the installation for their own morale purposes may continue to have fundraisers during CFC and AER, but not in the federal workplace.

i. Leave and passes or other official benefits will not be auctioned off, raffled off, etc. Groups are strictly prohibited from offering military benefits to individuals involved in fundraising, such as time off, passes, training holidays, or authorized wear of civilian clothes during the duty day as an incentive or reward for their donation or participation in fundraising. Government property will not be sold or rented to raise money for any group. Official positions will not be offered for a price, i.e., “Commander for a Day.”

j. Groups will not sell, or offer on a donation-only basis, prepackaged snacks, sodas, or meals. Such sales infringe on the regulatory rights of AAFES and the DFMWR Fund. The GC may grant an exception to this prohibition only with AAFES and Director, DFMWR concurrence.

k. Groups will not serve any hot food items without the Food Handlers Training from Preventive Medicine Service, General Leonard Wood Army Community Hospital (GLWACH), and inspection prior

to the sale. This includes the sale of food such as hot dogs, hamburgers, chili, egg rolls, etc. This is not required for baked goods (or commercially packaged foods when sales comply with paragraph (j) above). Groups that contemplate serving food of this nature for fundraising purposes should coordinate with the GLWACH in order to allow time for training of food handlers. Additionally, when food is prepared at home, the public must be warned that the food for sale has been prepared at home. A list of ingredients used in preparing the food should be available for the buyer to inspect. Noncompliant organizations should expect their request to serve this type of food will be denied by the command.

l. If approval is obtained from the DFMWR Director and AAFES, fundraising groups may operate concession sales at DFMWR special events, such as lawn concerts, Fourth of July, etc.

Chapter 2
SOLDIER AND FAMILY READINESS GROUP FUNDRAISING

2-1. Concept and purpose

a. Unit SFRGs are a command sponsored vehicle for people within the unit to help each other and to ensure unit cohesion, readiness, and effectiveness. The SFRG exists to support the military mission by providing volunteers trained in effective communication, problem solving, conflict resolution, crisis intervention, and community resources. The primary purpose of SFRGs is to create strong and ready families with coping mechanisms for deployments.

b. SFRGs are not organized for the purpose of raising money. Although an SFRG may create one informal fund and conduct limited fundraising in support of legitimate family readiness activities, no SFRG Fund may raise more than $5,000.00 on an annual basis or maintain more than $5,000.00 in its account unless granted an exception to policy by the GC. Under no circumstances will an SFRG be permitted to fundraise in an amount that meets or exceeds the DoD monetary limit on gross annual income ($10,000). Approval to conduct fund raising does not imply that funds raised will be free from taxation. SFRG funds should only be used for events in the approved spend plan. Examples of events that will not be approved and which would be potentially taxable include: a river cruise or a trip to Disneyworld or Six Flags. Funds used to defray personal expenses may be considered by the Internal Revenue Service (IRS) or other tax authority to be taxable income to the SFRG. This is not required for unit cohesion or effectiveness, and thus is unrelated to the purpose of the SFRG. Likewise, funds raised from non-members of the fund may be considered taxable by the IRS. It is recommended that organizations raising more than $1,000.00 in a year should contact the IRS and/or Missouri Department of Revenue as tax questions arise.

c. SFRG Fundraising is only permitted to obtain funds to support events in the approved unit SFRG spend plan.

d. SFRGs are prohibited from fundraising outside the installation and may not use any funds for any purpose not consistent with the SFRGs official mission. Failure to comply with this regulatory requirement may subject the SFRG to lose fundraising privileges on FLW.

2-2. Responsibilities

a. The Installation SFRG Fundraising Advisor (DFMWR) assists SFRGs by aiding in the approval process for SFRG fundraisers, both internal and external.

b. Commanders at all Levels. Ensure SFRG compliance with this regulation. Brigade Commanders are delegated the authority to approve SFRG fundraisers located in their unit areas (after consultation with the Ethics Counselor), that are primarily internal to members of the units, SFRG, and do not compete with the DFMWR Fund or AAFES. No fundraising will be approved if the unit does not have an approved SFRG spend plan or requests to fundraise for a purpose not specified in the approved SFRG spend plan.

c. Unit Commanders will—

(1) Approve the unit SFRG Fund Standard Operating Procedure (SOP).

(2) Review SFRG financial reports and ensure compliance with the income and asset limitations prescribed by this regulation and AR 608-1.

(3) Ensure SFRG communication with higher headquarters for the purpose of coordinating SFRG activities at all levels and addressing SFRG concerns.

(4) Ensure SFRGs complies with tax laws as required.

(5) Assist the SFRG President and Treasurer in the preparation of the annual spend plan for submission through the battalion to the brigade commander for approval.

(6) Establishes and maintains an SFRG account.

(7) Shall ensure that all income from fundraisers is properly accounted for and entered into the appropriate accounting documentation and financial report.

(8) Shall ensure a strong internal control environment exists within the unit. Commander shall ensure all fundraisers adhere to financial internal controls over cash or cash equivalents. Unit commanders should contact the FLW Internal Review Office for assistance in designing financial and non-financial internal controls or for advice on the adequacy of existing internal controls.

d. Ethics Counselor. Appointed by the Staff Judge Advocate to provide legal advice on fundraiser requests.

e. SFRG members--

(1) Organize and operate the SFRG with unit support.

(2) Provide the commander with feedback to ensure the SFRG is working efficiently and effectively.

(3) Comply with the provisions of this regulation.

f. Treasurer/Fund Custodian. Serves as the primary fund custodian for the SFRG. The Commander must also designate an alternate fund custodian or treasurer. The Treasurer’s duties include:

(1) Responsible for fund custody, accounting, and keeping accurate records of SFRG funds.

(2) Arranges for regular and change of custodian audits.

(3) Attends SFRG meetings.

(4) Provides monthly and annual reports to the unit commander and to the first O-6 commander or designee in the unit's chain of command no later than 30 days after the end of the calendar year.

(5) Provides timely and accurate financial reports to the SFRG leader.

(6) As the Fund Custodian, the Custodian, or his/her alternate, may be personally liable and responsible for losses and any misuse of funds. SFRG funds are not Army funds, and the Army assumes no responsibility for SFRG liabilities.

(7) Accurately account for all funds generated at fundraisers. Ensure remaining inventory is properly accounted for and included in the profits from the fundraiser. Remaining inventory remains an asset of the SFRG and is to be tracked and accounted for. Remaining inventory cannot be shifted to the unit cup and flower fund or other like type fund without monetary reimbursement to the SFRG.

(8) Ensure internal cash controls for fundraisers are in place and operating effectively. Activities should contact the FLW Internal Review Office for assistance in designing internal controls or for advice on the adequacy of existing internal controls.

2-3. Uses of SFRG informal funds

a. In some circumstances, nonappropriated or appropriated support may legally be provided to SFRGs for specific activities official in nature. In other cases, or when NAF funding and APF funding is unavailable or not authorized, SFRG informal funds may be used.

b. SFRG informal funds must be used for the SFRG mission related purposes in the approved spend plan. Such funds should equitably benefit all SFRG members and should not benefit specific ranks or classes of individuals within the SFRG. The following uses of SFRG funds are quasi-official in nature, and therefore funds raised in support of them would not generally be considered taxable income by the IRS:

(1) Meeting refreshments.

(2) Childcare fees during the SFRG meetings.

(3) SFRG Volunteer training.

(4) Mileage incurred while on official SFRG business.

(5) Postage and operating supplies in support of unofficial activities of the SFRG.

(6) Modest activities designed to foster family involvement and prevent isolation.

c. Uses of SFRG funds outside the scope of the official SFRG mission and Fundraising beyond the $ 5,000 cap.

(1) Funds raised by SFRG funds will usually be exempt from income taxes provided they are spent for tax exempt purposes. Articles of merchandise purchased tax free for resale by the SFRG fund may be subject to state sales tax.

(2) SFRGs operating on FLW may not fundraise outside the installation, nor fundraise for purposes outside the SFRG mission. Additionally, SFRGs located at FLW may not exceed an annual gross receipt (income) cap of $5,000 per year from all sources, including fundraising, donations, and gifts. SFRG funds may only be used to support the approved uses specified in the unit SFRG spend plan.

(3) SFRGs are not equipped to handle the complete tax ramifications and stringent accounting requirements that can result from excessive fundraising or fundraising for purpose outside the SFRG's mission. When an SFRG raises money outside of the installation or group affiliation to defray costs of events that are outside the SFRG's tax –exempt purpose, the funds raised may be considered income to the SFRG/members, and therefore potentially taxable by the IRS. For example, SFRG funds cannot be used to defray personal expenses such as family trips to Disney World, Branson, or Six Flags, nor to purchases meals for Soldiers while in the field or for departure gifts. The IRS may view such events and expenditures as personal entertainment and it is unlikely that a commander could successfully argue to the IRS that the trip was required as part of the SFRG's mission. These SFRGs may be subject to criminal and civil IRS penalties.

2-4. Authority for SFRG funds

a. SFRG funds are authorized as informal funds controlled by references listed in appendix A of this publication and this regulation. They are subject to the following guidelines:

(1) Operation of the fund will be consistent with Army values and the JER.

(2) Use of funds is limited to expenses consistent with the purpose and function of the fund. SFRG funds may be used for all legitimate SFRG activities. SFRG funds should not be used to duplicate what other agencies provide (i.e., establishing a loan fund or emergency food locker when other agencies, such as ACS or AER, already have programs established). SFRG funds will benefit all in the SFRG equitably and will not benefit particular individuals or a particular class of individuals within the SFRG.

(3) SFRG funds may not be used to supplement DFMWR Unit Funds or be transferred to unit cup and flower informal funds. For example, SFRG funds will not be used to defray the expenses of a Military ball.

(4) The Fund Custodian (treasurer) and alternate are responsible for fund custody, accounting, and documentation.

(5) The Fund Custodian will provide financial reports to the unit commander monthly and as requested, upon change of command, upon change of fund custodians, and whenever there is a suspicion of irregularity. SFRG books need not be kept in accordance with formal accounting procedures but may be maintained much like a personal check register. Likewise, reports to the commander are not a formal audit, but should summarize the fund's financial status to include current balance, total amount earned, and how funds were spent. Annually, and no later than 30 days after the end of the calendar year, the fund custodian will provide financial reports to the first O-6 commander or designee in the unit's chain of command.

(6) SFRGs may not exceed an annual gross income cap of $5,000 per calendar year, January to December from all sources, including fundraising, donations, and gifts.

(7) Neither the U. S. nor its nonappropriated fund instrumentalities will assume any contractual or financial obligation of an SFRG's fundraising activities.

b. SFRG requests to fundraise in areas internal or external to their brigade will be submitted thru the chain of command to arrive at the appropriate approval authority no later than 30 days prior to the proposed fundraiser. All fundraisers targeted at non-members of the fund raising SFRG will be classified as external fundraisers. If the event involves hot food items, the SFRG point of contact is responsible for contacting Preventive Medicine 1 month in advance of the event to ensure time is available for training in food handling techniques.

(1) FUNDRAISERS WITHIN BRIGADE AREA. SFRG fundraisers earning money by conducting fundraisers within their brigade area targeting members of their unit SFRG may be approved by the Brigade-level Commander, or designee, with the concurrence of an Ethics Counselor and other agencies as appropriate based on the product or service offered (i.e., AAFES, DFMWR, and Preventive Medicine if food and beverages are included). These fundraisers will be coordinated through the Installation SFRG Fundraising Advisor.

(2) FUNDRAISERS OUTSIDE BRIGADE AREA. The GC is the approval authority for all SFRG fundraisers conducted outside a unit's brigade area, or targeting customers who are not members of the unit SFRG, with the concurrence of the Ethics Counselor and other agencies as appropriate based on the product or service offered. These fundraisers will also be coordinated through the Installation SFRG fundraising advisor.

c. Written or electronic approval from the facility manager is required for the use of an installation facility (e.g., AAFES facilities, Soldier Center (Bldg. 470), USO, DFMWR facilities, etc.).

d. Commanders of training units may not solicit IET Soldiers to participate in, purchase, or contribute anything of value to an SFRG fundraiser. Commanders of deployable units may inform the unit of an SFRG fundraiser during a unit formation or via official email.

e. Commanders may release Soldiers to support on-post fund raisers, so long as there is no negative impact on the mission, and support is purely voluntary. If early release of Soldiers to support an on-post fundraiser is command initiated, all Soldiers (regardless of whether they actually participate in the fundraiser) must be released early and participation at the fundraiser must still be voluntary. Note: Cadre will not be involved in any fundraising involving IET Soldiers or their family members.

Chapter 3
UNIT INFORMAL FUNDS

a. In accordance with AR 600-20, Army Command Policy, paragraph 4-20, Commanders may authorize unit informal funds. Unit informal funds may collect fees and membership dues and sell tickets to unit events such as dining-ins and balls in the federal workplace and engage in other fundraising in approved locations. Unit informal funds exist solely to provide benefits to the personnel associated with the unit and their family members. Examples of informal funds are cup and flower funds, baby gift funds, hail and farewell funds, dinner funds, ball funds, coffee funds, and picnic funds.

b. In the federal workplace. Informal funds will not engage in any fundraising activity in the federal

workplace other than the collection of dues and contributions from members in the unit affiliated with the fund. These activities may collect contributions in the federal workplace because this activity is not charitable fundraising and is not prohibited. Such funds may be authorized at the discretion of the commander IAW AR 600-20, para 4-20. No further approval for collections is required. An incidental contribution from a nonmember of the unit is not prohibited. For example, a visitor to the office pays 50 cents to the office coffee fund for a cup of coffee. That would be considered an incidental contribution and is allowable.

c. Outside the federal workplace. Unit informal funds may not fundraise outside of the unit footprint.

d. Brigade commander or their designee may approve fundraisers within unit area. Ethics Counselor coordination is required.

e. Unit informal funds are forbidden from fundraising at IET graduation and family day events. This prohibition includes requesting donations.

f. Operation of informal funds will be consistent with Army values and the JER.

Chapter 4
UNIT DFMWR ACTIVITY FUNDS

4-1. General

a. Soldiers and military units receive Morale, Welfare, and Recreation (MWR) services through the DFMWR. In addition to the services and funding directly provided by DFMWR, units are permitted to conduct limited fundraising to supplement the fund available to the unit for approved DFMWR purposes. Permission to conduct any unit level DFMWR fundraising is a privilege not a right. All DFMWR fundraising must be approved by DFMWR.

b. All funds raised through the conduct of an DFMWR fundraiser must be deposited into the unit DFMWR account within 24 hours of the event.

c. Funds will be distributed to the unit as requested for appropriate DFMWR purposes and events as set out in AR 215-1, Military Morale, Welfare, and Recreation Programs and Nonappropriated Fund Instrumentalities. The DFMWR will not release funds for a purpose not permitted by AR 215-1.

d. DFMWR Unit Funds are forbidden from fundraising at IET graduation and family day events.

4-2. Restrictions on competition with Army Air Force Exchange Services (AAFES)

a. No fundraiser will be approved that appears to involve the sale of goods or services which duplicate those sold by AAFES. Where it appears, the proposed fundraising effort might interfere with AAFES primacy the unit will be directed to seek written permission from AAFES as part of the approval process.

b. AAFES's right to restrict competition includes goods and services provided by AAFES contract and concessionaire vendors.

4-3. Restrictions on DFMWR fundraising in training units

a. Pursuant to TRADOC Regulation 350-6, no cadre or permanent party Soldier may be involved in selling any good or service to an IET Soldier or their family member. This prohibition includes family days and unit graduations.

b. This prohibition does not restrict trainees from being permitted to participate in DFMWR events.

Appendix A
REFERENCES

Section I
Required Publications

DoDD 5500.7-R Joint Ethics Regulation (15 May 2024)

AR 1-10, Fundraising within the Department of the Army (22 Dec 2025)

AR 210-22, Support for Non-Federal Entities Authorized to Operate on Department of the Army Installations (12 May 2022)

AR 600-20, Army Command Policy (15 April 2026)

AR 608-1, Soldier and Family Readiness (26 May 2026)

HQDA EXORD 233-19 (16 December 2019)

TR 350-6, Enlisted Initial Entry Training Policies and Administration (28 August 2025)

Section II
Related Publications

DODI 1304.33, Protecting Against Inappropriate Relations During Recruiting and Entry Level Training (28 January 2015)

DODI 1000.15, Procedures and Support for Non-Federal Entities Authorized to Operate on DoD Installations (24 October 2008)

DoDI 5035.1, CFC Fundraising Within the DoD (6 June 2017)

AR 930-4, Army Emergency Relief (5 May 2019)

AR 215-1, Military Morale, Welfare, and Recreation Programs and Nonappropriated Fund Instrumentalities (24 September 2010)

AR 210-7, Personal Commercial Solicitation on Army Installations (11 May 2021)

AR 165-1, Army Chaplain Corps Activities (23 June 2015)

Section III
Prescribed Forms

This section contains no entries.

Section IV
Related Forms

This section has no entries.

Section V
Terms

Cadre

All military, permanent party members, or civilian personnel that command, supervise, instruct, train, or directly support IET Soldiers.

Soldier and Family Readiness Group (SFRG)

A command sponsored organization of family members, volunteers, and Soldiers belonging to a unit that together provide an avenue of mutual support and assistance and a network of communications among the family members, the chain of command, and community resources.

Fundraising

Fundraising includes any activity conducted for the purpose of collecting money, goods, or other support for the benefit of others. The term includes the exchange of merchandise or services for a donation.

Group

Group or groups for the purpose of this regulation refers to informal cup and flower funds, SFRG Funds and unit DFMWR Activity Funds.

Initial Entry Training (IET)

This regulation uses IET as defined in TRADOC Regulation 350-6, paragraph 1-1.

Informal Fund (IF)

An unofficial fund authorized by the unit commander that is limited in its scope of activities, membership, or funds.

Nonappropriated Funds (NAF)

Cash and other assets received from sources other than Congressional appropriations. Nonappropriated funds are government funds used for the collective benefit of those who generate them. These funds are separate and apart from funds that are recorded in the books of the Treasurer of the United States.

Non-Federal Entity (NFE)

A self-sustaining non-Federal entity incorporated or unincorporated, which is operated on DoD installations with the written consent of the Garrison Commander or higher authority, by individuals acting exclusively outside the scope of any official capacity as officers, employees, or agents of the

federal government.

Unit Activity Fund

Monetary nonappropriated fund support received through the MWRF. Installation commanders make the determination on NAF support. Such support will be applied equitably to all units or personnel within the installation. Installation units receiving NAF support are referred to as “unit activities” and are accounted for within the MWRF. With permission from DFMWR units may conduct earned DFMWR fund raisers. Such fund raising may not involve IET Soldiers.

Glossary

AAFES - Army Air Force Exchange Services

AER - Army Emergency Relief

CFC - Combined Federal Campaign

DFMWR - Directorate of Family and Morale, Welfare, and Recreation

DOD - Department of Defense

FLW - Fort Leonard Wood

SFRG - Soldier and Family Readiness Group

GC - Garrison Commander

GLWACH - General Leonard Wood Army Community Hospital

HQ - Headquarters

IET - Initial Entry Training

IMWRF - Installation Morale, Welfare, and Recreation Fund

JER - Joint Ethics Regulation

MSCoE - Maneuver Support Center of Excellence NAF - Nonappropriated Fund

NFEs - Non-Federal entities

POA - Public Affairs Office

PX - Post Exchange