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SECRETARY OF THE AIR FORCE**

**AIR FORCE INSTRUCTION 34-223**



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**PRIVATE ORGANIZATIONS PROGRAM**

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This instruction implements Department of Defense Instruction 1000.15, *Procedures and Support for Non-Federal Entities Authorized to Operate on DoD Installations*. It provides guidance and procedures for establishing and operating Private Organizations on Air Force installations. This instruction has been developed in collaboration between the Deputy Chief of Staff for Manpower, Personnel and Services (AF/A1), the Chief of the Air Force Reserve (AF/RE) and the Director of the Air National Guard (NGB/CF), and applies to all regular Air Force members, the members of Air Force Reserve, and members of the Air National Guard. This instruction provides mandatory requirements for non-Federal entities seeking recognized status as a Private Organization by one or more Air Force installations. Ensure all records created as a result of processes prescribed in this publication are maintained in accordance with Air Force Manual (AFMAN) 33-363, *Management of Records*, and disposed of in accordance the Air Force Records Disposition Schedule located in the Air Force Records Information Management System. Refer recommended changes and questions about this publication to the Office of Primary Responsibility using Air

Force Form 847, *Recommendation for Change of Publication*; route Air Force Forms 847 from the field through the appropriate functional chain of command. The authorities to waive wing/unit level requirements in this publication are identified with a Tier (“T-0, T-1, T-2, T-3”) number following the compliance statement. See AFI 33-360, Publications and Forms Management, for a description of the authorities associated with the Tier numbers. Submit requests for waivers through the chain of command to the appropriate Tier waiver approval authority, or alternately, to the requestors commander for non-tiered compliance items.

(ANG) AFI 34-223, *Private Organization (PO) Program*, 13 December 2018, is supplemented as follows. This supplement applies only to Air National Guard (ANG) units and members. This supplement tailors the Air Force (AF) instruction to the ANG organizational structure. Additionally, it requires ANG installation commanders to annually require all base unit commanders to certify compliance with regulatory guidance for Unofficial Activities and/or Private Organizations associated with their units. Send comments and suggested improvements to this supplement on AF Information Management Tool (IMT) 847, *Recommendation for Change of Publication*, through channels, to the Air National Guard Force Management Division (NGB/A1P), 3500 Fetchet Avenue, Andrews AFB, MD 20762-5157.

## ***SUMMARY OF CHANGES***

This document has been substantially revised and needs to be completely reviewed. Major changes include updates to duty and position titles, approval levels and authorities to waive wing/unit level requirements. Guidance has been added on the differing rights and responsibilities of unit unofficial activities in comparison to Private Organizations. Provisions have also been included allowing unofficial activities to temporarily exceed the \$1,000 maximum cash balance limit for seasonal social events, the removal of inventory as an element of the \$1,000 limit, and the authority to permanently increase the \$1,000 limit based on the number of unit members. The rules regarding the serving of alcohol by Private Organizations have also been modified.

(ANG) This supplement is revised to comply with the updated AFI 34-223, Private Organizations (PO) Program.

### ***Section A—General***

**1. Private Organizations.** Private Organizations are self-sustaining special interest groups, set up by individuals acting exclusively outside the scope of any official capacity as members of the Air Force or Federal Government, to include civilians, contractors, Air Reserve and Air National Guard members. They operate on Air Force installations with the written consent of the Installation Commander.

**1. (ANG) Private Organizations (POs).** POs are self-sustaining special interest groups, set up by people acting exclusively outside the scope of any official capacity as officers, employees, or agents of the Federal or State Government. POs operate on installations with the written consent of the ANG installation commander.

1.1. Private Organizations are non-Federal entities and are to be treated as such. Accordingly, they are not nonappropriated fund instrumentalities as defined in AFMAN 34-201, *Use of*

*Nonappropriated Funds*, nor are they entitled to the sovereign immunities and privileges given to nonappropriated fund instrumentalities or the Air Force.

1.2. Personal and professional participation in Private Organizations is governed by DoD 5500.07-R, *Joint Ethics Regulation* [hereinafter JER].

1.3. Private Organizations, regardless of unit affiliation, are non-federal entities with greater latitude in fundraising. See **paragraph 10** for limitations.

1.3.1. Private Organizations may consist of service members and/or their families; however, they are not considered “for us, by us” fundraising entities within the meaning of JER Section 3-210(a)(6).

1.3.2. Service members may not perform activities for Private Organizations while in an official duty status. **(T-1)**

1.3.3. A Private Organization’s official communication support will be limited.

## **2. Applicability.**

2.1. The following organizations are not considered Private Organizations covered by this AFI; they are governed by their own Department of Defense Directives and Instructions as referenced:

2.1.1. Scouting organizations operating overseas on USAF military installations, DoDI 1015.9, (e), *Professional U.S Scouting Organization Operations at U.S. Military Installations Located Overseas*.

2.1.2. Military relief societies (Department of Defense Instruction 1000.15, *Procedures and Support for Non-Federal Entities Authorized to Operate on DoD Installations*).

2.1.3. Banks or credit unions (DoDI 1000.11, *Financial Institutions on DoD*).

2.1.4. Support provided under Innovative Readiness Training (DoDD 1100.20, *Support and Services for Eligible Organizations and Activities Outside the Department of Defense*).

2.1.5. American National Red Cross (DoDD 1330.5, *American National Red Cross*).

2.1.6. United Seaman’s Service (DoDD 1330.16, *United Seaman’s Service (USS)*).

2.1.7. United Service Organizations, Inc. (DoDD 1330.12, *United Service Organizations, Inc.*).

2.2. Unofficial unit-affiliated activities (e.g., coffee funds, water funds, sunshine funds) are not considered Private Organizations, unless current assets (cash, receivables and investments) exceed a monthly average of \$1,000 over a three (3)-month period. On-hand inventory is not included in current asset calculations. Activities which exceed the asset limit (\$1,000) must become a recognized Private Organization, discontinue operations, or reduce its current assets below the \$1,000 threshold. **(T-1)**

2.2.1. Unofficial unit activities may temporarily exceed the asset limit (\$1,000) for a time period not to exceed six (6)-months; if the substantial majority (more than 75%) of assets will be expended on an upcoming large unit event such as a holiday party, military ball, etc. **(T-3)**

2.2.2. The \$1,000 average monthly limit may be increased by \$100 for every 50 unit members over 300 members, to a maximum of \$5,000 monthly average. (T-3)

2.2.3. Unofficial unit activities, although encouraged to do so, but are not required to implement financial management tools (budgets/financial statements/audits), similar to those described in **paragraph 10.6. and .** At a minimum, unit unofficial activities will implement the following financial controls:

2.2.3.1. Maintain a two (2)-person accountability system for all cash transactions. (T-3)

2.2.3.2. Submit a basic annual financial report to unit commander detailing income and expenditures throughout the year. (T-3) See **paragraph 10.6.2.**

### ***Section B—Roles and Responsibilities***

**3. The Director, Air Force Services (AF/AIS).** Provides oversight and policy for the Private Organization Program, and unless otherwise noted, is the approval authority for any waivers or exceptions to this Air Force Instruction.

**4. The Commander, Air Force Services Activity (AFSVA/CC).** Oversees, develops and publishes operational guidance and procedures for the Private Organization Program.

#### **5. Installation Commander:**

5.1. Is the approval authority for establishment of Private Organizations when he/she determines they will make a positive contribution to the quality of life of base personnel. Approval authority and below actions may be delegated to Mission Support Group Commander (MSG/CC)

5.2. Will withdraw authorization if the Private Organization prejudices or discredits the United States Government, conflicts with Government activities, or for any other reason or just cause. (T-1)

5.3. Will take action on requests for fundraisers. (T-3)

5.3.1. Is the approval authority for unofficial unit activities' accumulation of more than \$1,000 for a time not to exceed six (6)-months.

5.3.2. Fundraiser and accumulation of extra funds approval authority maybe delegated to Force Support Squadron Commander (FSS/CC) or Director (FSS/CD) per AFI 36-3101, *Fundraising within the Air Force.*

5.4. Authorizes contractor and subcontractor participation in Private Organizations when justified, as long as the interests of the Air Force are fully protected.

5.5. Will direct a Private Organization to eliminate duplication of services when services are determined to compete with the installation's nonappropriated fund revenue-generating activities and Army and Air Force Exchange Service. (T-1)

5.6. Will ensure background checks are completed for employees and volunteers of Private Organizations who have contact with children under the age of 18 in Department of Defense-operated programs used to supplement or expand childcare or youth services, according to

DoDI 1402.05, *Background Checks on Individuals in DoD Child Care Services Programs*. (T-0)

5.7. (ADDED-ANG) Annually requires all subordinate unit commanders certify compliance with regulatory guidance for all Unofficial Activities or Private Organizations associated with their units by using the Commander's Checklist at **Attachment 2** (Added). A copy of each completed checklist should be forwarded to the Base Services Manager. (T-2)

5.8. (ADDED-ANG) Annually ensures compliance with regulatory guidance for all Unofficial Activities or Private Organizations on their installation by using the Commander's Checklist at **Attachment 2** (Added). (T-2)

5.9. (ADDED-ANG) ANG units collocated on active duty Air Force installations may establish an agreement with the host that the active duty host Force Support Squadron monitors ANG POs/UAs IAW the basic AFI 34-223. This needs to be documented in the MOA/DD 1144 between the ANG and host installation.

**6. Commander/Director, Force Support Squadron (FSS/CC or FSS/CD):** Monitor and administers the installation private organization program. FSS/CC or FSS/CD will:

6.1. Ensure membership provisions and startup justification continue to apply. (T-1)

6.2. Advise the installation commander on Private Organization changes, to include a recommendation to revoke or continue permission to operate. (T-3)

**7. Force Support Resource Manager or Resource Management Flight Chief:**

**7. (ANG) Base Services Manager:**

7.1. Will maintain a file on each installation Private Organization. (T-1)

7.1. (ANG) Keeps a file on each PO and reviews each PO annually at the close of the PO's fiscal year to ensure financial statements, documents, records, and procedures outlined in the ANG Private Organization Handbook and this AFI / Supplement are in order. The guard specific ANG Private Organization Handbook is located on the NGB/A1XR sharepoint site at: <https://cs2.eis.af.mil/sites/12876/CombatSupport/SitePages/Home.aspx> (T-2)

7.2. Will annually review the Private Organization's folder to ensure financial statements, documents, records, and other information as required this Instruction and the Private Organization guide are in order. (T-1)

7.2. (ANG) The Base Services Manager will maintain a file on Unofficial Activities to allow monitoring of the activity/group for the installation commander. This file should include a point of contact (POC), statement of purpose, normal location of gathering or activity, and any other documentation deemed appropriate. (T-1)

7.3. The Private Organization guide is located on the AFSVA Portal.

**8. Installation Staff Judge Advocate.** *Installation legal offices should not provide legal advice to prospective and currently-recognized Private Organizations. (T-1) However, legal advisors may ensure that Private Organizations do not compromise the Air Force by providing guidance on compliance with this instruction, with AFI 36-3101, and with other applicable directives. There may be instances (e.g., making the necessary State and Federal filings to become a nonprofit organization) when a Private Organization, or its prospective members, should hire outside*

*counsel, but most Private Organizations do not have the resources, sophistication or need for outside counsel. Installation legal advisors may assist Private Organizations with identifying and applying the formation, certification and recertification (paragraph 8), annual financial reports and fiscal controls (paragraphs 9.6-9.7), and dissolution (paragraph 11) provisions of this instruction. On Joint Bases where the Air Force is the Supported Component, legal advisors may similarly assist the Supporting Component's Private Organization program. Legal advisors may support by identifying, interpreting, and applying similar provisions in the Supporting Component's governing regulation (see e.g., Army Regulation 210-22, Private Organizations on Department of the Army Installations) in regards to Air Force-affiliated Private Organizations and may liaison between the installation legal office and representatives of Air Force-affiliated Private Organizations.*

### ***Section C—Establishing, Operating, and Dissolving a Private Organization Activity***

**9. Setting up a Private Organization.** A Private Organization must submit a written constitution, bylaws, or other similar documents, outlined by the Air Force Services Activity operational guidance and procedures through the Force Support Resource Management/Resource Management Flight Chief, Force Support Squadron Commander/Director and Staff Judge Advocate for consideration by the Installation Commander. **(T-1)** Department of Defense personnel may not be on official duty time when developing constitutions, bylaws, or similar documents in support of Private Organization activities. **(T-1)**

**9. (ANG) Setting Up a PO.** A PO must submit a written constitution, bylaws, or other similar documents, outlined in the ANG Private Organization Handbook, through the Base Services Manager, Force Support Squadron Commander, and Staff Judge Advocate for consideration by the installation commander. DoD personnel may not be on official duty time when developing constitutions, bylaws, or similar documents in support of Private Organization activities. **(T-1)**

9.1. Unit commanders must weigh the pros and cons of transitioning their unofficial activity into a Private Organization. As a general rule, unofficial activities' fundraising efforts are considered "for us, by us" fundraising within the meaning of JER Section 3-210. As such, commanders may advertise and support their fundraising efforts through the use of official communication systems (to unit members) and by allowing unit personnel to support such efforts while in a duty (but not to interfere with mission) status. On the other hand, unofficial activities are still Federal entities and may not solicit gifts from outside sources or engage in off base fundraising.

9.2. The constitution, bylaws, or similar documents submitted by the Private Organization must:

9.2.1. Address the nature, function, objectives, membership eligibility, and sources of income of the Private Organization. **(T-0)**

9.2.2. Include certification that Private Organization members were notified and understand their personal financial liability for obligations of the Private Organization, as provided by law. **(T-1)**

9.2.3. Describe the responsibilities of Private Organization officers and their role in asset accountability, and financial and operational management. **(T-1)**

9.2.4. Provide specific guidance on disposition of residual assets and liabilities upon dissolution. **(T-1)** Note: A Private Organization may dispose of its assets only in the manner outlined in its constitution, bylaws, or similar documentation. If the proper provisions exist, a Private Organization may give residual assets to the Air Force or a Nonappropriated Fund Instrumentality in accordance with Air Force Instructions 51-601, *Gifts to the Department of the Air Force*, and AFMAN 34-201. Neither Appropriated Fund activities nor Nonappropriated Fund Instrumentalities may claim the assets of, or make or assume any obligation for, a Private Organization except those that may arise from a valid contract between them.

9.3. The organization's request for certification must be resubmitted for review and approval every two years or when there is a change in the purpose, function, or membership eligibility of the Private Organization, whichever comes first and must be reviewed by the installation Staff Judge Advocate. **(T-1)**

9.4. Provide the contact information for a primary and alternate local representative for the organization, since Private Organizations are local in nature (most often their membership is formed by Airmen and family members attached to the installation) and they must remain accountable to the Installation Commander. **(T-2)**

**10. Operating a Private Organization.** Installation Commanders provide limited supervision over Private Organizations. Their control lies in the power to authorize and withdraw authorization for these organizations to operate on the installation. They ensure compliance with the requirements of this instruction, but do not control or dictate internal activities or structure of Private Organizations.

10.1. Private Organizations must prevent the appearance of an official sanction or support by the Department of Defense. **(T-0)**

10.1.1. Private Organizations may not use the seals, logos, or insignia of the Department of Defense or any Department of Defense Component, Air Force or Department of Defense organizational unit, or Air Force and Department of Defense installation on organization letterhead, correspondence, titles, or in association with organization programs, locations, or activities. **(T-1)**

10.1.2. Private Organizations operating on Air Force installations may use the name or abbreviation of the Department of Defense, an Air Force organizational unit, or installation in the Private Organization name provided that the status as a Private Organization is apparent and unambiguous and there is no appearance of official sanction or support by the Department of Defense. The following applies:

10.1.2.1. Private Organizations must have written approval from the Installation Commander before using the name or abbreviation of the installation or organizational unit. Requests for use of the Department of Defense or Air Force name or abbreviation must be routed to the Air Force Services Activity, AFSVA/SVI, for action. **(T-1)**

10.1.2.2. Any use of the name or abbreviation of an Air Force organizational unit, or installation must not mislead members of the public to assume a Private Organization is an organizational unit of the Air Force. **(T-1)**

- 10.1.2.3. Private Organizations must prominently display the following disclaimer on all print and electronic media mentioning the Private Organization's name confirming that the Private Organization is not part of the Department of Defense: "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." **(T-0)**
- 10.2. Private Organizations may not discriminate in hiring practices or membership policies on the basis of age (over 40 years), race, religion, color, national origin, disability, ethnic group, or gender (including pregnancy, gender identity and sexual orientation). Anyone who suspects unlawful discrimination by Private Organizations should contact the local Equal Opportunity Counselor and follow the procedures in Air Force Instruction 36-2706, *Equal Opportunity Program Military and Civilian*. **(T-0)**
- 10.2.1. Private Organizations may organize around a cultural, ethnic, religious or sexual orientation focus as long as they do not restrict their membership on the basis of culture, ethnicity, religion or sexual orientation.
- 10.2.2. Spouses clubs will be open and inviting to spouses of both genders and any sexual orientation. **(T-0)**
- 10.3. Private Organizations may not haze or harass (either physically or mentally) as part of their initiation rites. **(T-0)**
- 10.4. Religiously oriented Private Organizations may be authorized to operate on installations if:
- 10.4.1. Requests by similar organizations are also approved.
- 10.4.2. Authorization is for non-exclusive use of government facilities.
- 10.4.3. No sign or insignia or other organizational identification is placed on or inside government facilities except when the organization's activities are in progress.
- 10.4.4. Membership is not restricted to members of the religion involved. **(T-1)**
- 10.4.5. The installation staff chaplain coordinates on the request.
- 10.5. Private Organizations must be self-sustaining, primarily through dues, contributions, service charges, fees, or special assessments of their members. **(T-1)** There will be no financial assistance to a Private Organization or unit unofficial activity from a Nonappropriated Fund Instrumentality in the form of contributions, repairs, services, dividends, or donations of money or other assets. **(T-1)**
- 10.5.1. Private Organizations must properly plan and adequately control the money aspects of their goals and objectives, including cash and other assets. **(T-1)**
- 10.5.2. Income must not accrue to individual members except through wages and salaries for Private Organization employees or other payment for services rendered to the Private Organization or military community. **(T-1)** Any income will be derived primarily for offsetting expenses of operation, which may include competitive awards or charitable contributions. As an exception, Installation Commanders may authorize investment-oriented Private Organizations if they comply with all other provisions of this Instruction.



10.5.3. **(ADDED-ANG)** Private Organization funds cannot be commingled with Federal or State funds. (T-0)

10.6. Private Organizations must use budgets and financial statements as financial management tools. **(T-2)** Additional financial requirements are provided in the Air Force Services Activity Private Organization Guide.

10.6.1. The budget details financial plans for annual operations. It includes projected activities (income and expense) and capital purchases (equipment and property). The budget establishes financial objectives to generate sufficient income to offset planned expenses. Comparing actual results with the budget helps indicate management performance.

10.6.2. Private Organizations must prepare an income-and-expense statement, either on an accrual or cash basis. **(T-2)** The income and expense statement reflects monetary events that have occurred during a given period.

10.6.3. Private Organizations must also prepare a balance sheet that accounts for total assets, liabilities and net worth (equity) of the Private Organization's financial condition on a given date. **(T-2)**

10.7. Private Organizations with certain levels of gross annual revenue must undergo audits and financial reviews at the Private Organization's own expense: **(T-2)**

10.7.1. Certified Public Accountants perform annual audits of Private Organizations with gross annual revenues of \$250,000 or more. Use of a Certified Government Financial Manager is permitted in overseas locations when the Resource Management Flight Chief documents that a Certified Public Accountant is not available.

10.7.2. Accountants (Certified Public Accountant not required) perform annual financial reviews of Private Organizations with gross annual revenues of \$100,000, but less than \$250,000. Accountants conduct these reviews and provide written verification of the accounting data and other relevant information.

10.7.3. Private Organizations that have gross annual revenues of less than \$100,000, but more than \$5,000, normally are not required to conduct an independent audit or financial review. However, such Private Organizations must provide an annual financial statement to the Force Support Resource Manager/Resource Manager Flight Chief no later than 20 days following the end of the Private Organization's fiscal year. **(T-2)**

10.7.3. **(ANG)** POs that have gross annual revenues of less than \$100,000, but more than \$5,000, normally are not required to conduct an independent audit or financial review. However, such POs must provide an annual financial statement, as outlined in the ANG Private Organization Handbook, to the Base Services Manager NLT 20 days following the end of the PO's fiscal year. (T-2)

10.7.4. If there are signs of fraud or other improprieties, regardless of the amount of revenue, the Force Support Squadron Commander/Director advises the Installation Commander. The Installation Commander should request an audit from the Air Force Audit Agency, which may schedule the review within available resources.

10.7.4. **(ANG)** If there are signs of fraud or other improprieties, regardless of the amount of revenue, the Force Support Squadron Commander advises the installation commander.

The installation commander should request an audit from the Air Force Audit Agency (AFAA), which may schedule the review within available resources. In addition to the AFAA, ANG commanders have access to the state United States Property & Fiscal Officer (USPFO) for external audit capabilities.

10.7.5. The audit (which generally provides more detailed information) and the financial review must verify the Private Organization has:

10.7.5.1. A uniform system of accounting. **(T-2)**

10.7.5.2. Consolidated reports of the accounting system into meaningful summaries. **(T-2)**

10.7.5.3. Identified areas of weakness and plan(s) for corrective action. **(T-2)**

10.7.6. Private Organizations must implement internal control procedures that ensure:

10.7.6.1. Adequate segregation of duties. **(T-2)**

10.7.6.2. Proper procedures for authorizations. **(T-2)**

10.7.6.3. Adequate documents and records. **(T-2)**

10.7.6.4. Physical control over assets and records. **(T-2)**

10.7.6.5. Independent checks on performance. **(T-2)**

10.8. Private Organizations and unofficial activities/organizations must not engage in activities that duplicate or compete with activities of the Army and Air Force Exchange Services or Force Support Squadron Nonappropriated Fund Instrumentalities. **(T-0)**

10.9. Private Organizations and unofficial activities/organizations will not operate amusement machines, slot machines, lotteries, raffles, games of chance, or other gambling-type activities, (except as authorized in **paragraph 10.20**, below); nor will they engage in frequent or continuous resale activities either directly or indirectly through third parties. **(T-1)**

10.9.1. The prohibition against frequent or continuous resale activities does not preclude collective purchasing and sharing of purchased items by members of Private Organizations or unofficial activities so long as there is no actual resale.

10.9.2. **(Added-ANG)** Dining Social Clubs (DSCs), properly chartered and administered in accordance with ANGI 34-121, *Dining Social Club Organizations*, may conduct continuous resale activities under the Air Force waiver to this paragraph as documented in **paragraph 1.5.2**, ANGI 34-121. **(T-1)**

10.10. The Installation Commander or designee, per **paragraph 5.4.**, approves Private Organization continuous thrift shop sales operations and occasional on-installation events for fundraising purposes (e.g., bake sales, dances, carnivals, car washes, or similar functions) which the Private Organization conducts directly or indirectly through a third party.

10.10.1. Unit commanders may approve unit unofficial activity fundraisers on the installation within the unit, and only for the unit's personnel. Fundraising outside the unit requires Installation Commander or designee approval.

10.10.2. Occasional fundraising is defined as not more than three per calendar quarter. The length of a fundraising event is fact dependent. For example, a community theatre

performance might only last a single evening; whereas, cookie and candy sales might last three days over a holiday weekend.

10.10.2.1. The occasional sales limitation for funding does not apply to unit unofficial activity or Private Organization sales of Air Force School or unit souvenirs, memorabilia to members of the school or unit involved. This is contingent on the Army and Air Force Exchange Services or Force Support Squadron resale activities electing not to provide this service and the Private Organization chartering documentation authorizing resale under these circumstances. Nor does it apply to Private Organizations sales conducted pursuant to a concessionaire contract with the installation Force Support Squadrons/Morale Welfare Recreation programs at Open Houses and similar events.

10.11. Fundraisers conducted by unit unofficial activities off the installation are not appropriate. **(T-2)**. Private organizations may conduct fundraising events off the installation so long as it is clear to members of the public that the organization is not representing the installation or the Air Force. Private organizations and unofficial activities should consult with their local Force Support POC and the local installation Judge Advocate before engaging in fund raising off the installation.

10.12. Private Organizations may not make direct solicitations for donations from non-members on base. **(T-2)**

10.13. Private Organizations and unit unofficial activities operating on an Air Force installation are prohibited from engaging in any conduct that has the effect of advertising for, making referrals to, or encouraging use of any commercial business concerns. **(T-0)** The only exception to this policy is when a Private Organization or unofficial activity/organization conducts an approved fundraising event through a third-party (e.g., the spouses club conducts an art sale as an approved fundraiser and contracts with an art dealer (third party) to provide the artwork to be sold).

10.14. Private organizations will not sell or serve alcoholic beverages on Air Force installations. **(T-1)**. **EXCEPTION:** At the discretion of the installation commander, Nonappropriated Fund Instrumentalities-operated Morale Welfare and Recreation programs may secure the aid of volunteers or persons providing gratuitous services to assist in the sale of Morale, Welfare and Recreation-procured alcoholic beverages. Nonappropriated Fund Instrumentality operated Morale Welfare and Recreation programs may also enter into contractual agreements with unit unofficial activities or installation Private Organizations, under which the military unit unofficial activity (such as a booster club) or Private Organization provides qualified personnel to assist the Nonappropriated Fund Instrumentality in selling alcoholic beverages at Morale, Welfare and Recreation events in exchange for a fee. Fees paid to military unit booster clubs or Private Organizations are deposited into the appropriate accounts; units will not require Airmen to participate in the event. **(T-1)**. This may also apply to events, such as open houses or other special installation events. All personnel assisting the Nonappropriated Fund Instrumentality Morale Welfare and Recreation program to sell alcoholic beverages at such events receive appropriate "Dram Shop" training as outlined within AFI 34-219, *Alcohol Beverage Program*.

10.14.1. Alcoholic beverages may be consumed and shared among members of legal drinking age of the Private Organization and their guests of legal drinking age in a potluck fashion at Private Organization social (non-business) events.

10.14.2. **(ADDED-ANG)** Dining Social Clubs (DSCs), properly chartered and administered in accordance with ANGI 34-121, *Dining Social Club Organizations*, may sell alcoholic and malt beverages under the Air Force waiver to this paragraph as documented in [paragraph 1.5.2](#), ANGI 34-121. (T-1)

10.15. Private Organizations must have liability insurance unless the Installation Commander waives the requirement. **(T-1)** This waiver authority may be delegated to the Mission Support Group Commander. No further delegations are authorized. **(T-1)** Insurance should be required unless the activities of the Private Organization are such that the risk of liability is negligible. Private Organization members must be made aware that they are jointly and severally liable for the obligations of the Private Organization. The absence of liability insurance places their personal assets immediately at risk in the event of Private Organization liability. Forward all waiver requests through the servicing legal office prior to approval. The commander or delegates may waive the requirement for continuous liability coverage; however, the approval document must advise the Private Organization that the commander may still require liability insurance for specific events that involve a greater risk of injury or damage. Insurance waivers must be reevaluated annually. **(T-2)**

10.16. The Private Organization should consider bonding for its treasurer. The treasurer is in a sensitive position, especially if handling and controlling large amounts of cash. Private Organizations may make a bonding determination by weighing the cost of commercial fidelity insurance protection from a qualified underwriter against the potential dollar risk.

10.17. Private Organizations and unit unofficial activities must comply with all applicable federal, state, local, and foreign laws governing like civilian activities. **(T-0)** Some Private Organizations may qualify for tax-exempt status. It is the responsibility of the Private Organization to obtain proper tax-exempt information and forms through the regional Internal Revenue Service office and the state taxing authority. **(T-0)**

10.18. Private Organization officers and members must report any signs of fraud or other improprieties to the Force Support Squadron Commander/Director. **(T-1)**

10.18. **(ANG)** For ANG, PO officers and members must report any signs of fraud or other improprieties to the Base Services Manager, the Force Support Squadron Commander, or the Mission Support Group Commander. (T-1)

10.19. Private Organization officer and member and unofficial activities actions must not prejudice or discredit the United States Government or conflict with governmental activities. **(T-0)**

10.19.1. Private Organizations and unit unofficial activities may not directly solicit cash donations for their organization on base. Private Organizations and unit unofficial activities may raise funds through approved on base fundraising events as described in paragraphs [10.10](#) and [10.11](#). **(T-2)**

10.19.1.1. Force Support Squadrons may not co-sponsor events with Private Organizations or unofficial activities/organizations for the purpose of obtaining

commercial sponsorship, contributions, donations, gifts, advertising or generating revenue for them. **(T-1)**

10.19.1.2. In accordance with AFI 34-108, *Commercial Sponsorship and Sale of Advertising*, commercial sponsorship is not authorized to support Private Organizations or unit unofficial activities (such as social funds). **(T-0)** These entities are not authorized to partner with a Morale, Welfare and Recreation program to gain access to sponsorship benefits. **(T-0)**

10.19.1.3. Private Organizations and unit unofficial activities may accept gifts and donations from outside sources. Unit unofficial activities will not solicit gifts. **(T-1)** Private Organizations will not solicit direct monetary gifts or donations (as distinguished from the sale of items of value) on base. **(T-2)** 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. Donor/gift recognition may not be made publicly. **(T-1)** Oral recognition of the gift or donation can only be made to members of the Private Organization or those present at an event benefiting from the donation/gift. **(T-1)**

10.19.1.3.1. Private Organizations and unit unofficial activities are prohibited from actions which might make it appear that the installation is endorsing or giving special treatment to the donors involved. **(T-0)**

10.20. Fundraising raffles may be conducted on an Air Force installation by those Private Organizations that are composed primarily of Department of Defense personnel or their family members. **(T-1)** Such raffles provide a means of extending needed services or other assistance to members of the Department of Defense family, but failure to strictly follow the provisions below could result in the raffles violating JER Section 2-302. Unit unofficial activities are not authorized to conduct raffles. **(T-1)**

10.20.1. Raffles must be authorized in advance by the Installation Commander or designee. **(T-1)**

10.20.2. All requests to conduct raffles must be reviewed by the servicing Staff Judge Advocate's office and a raffle counts towards the overall Private Organization's limit to hold not more than three fundraisers per calendar quarter. **(T-1)** See paragraph 9.10.2.

10.20.3. Raffles must comply with State and local laws of the jurisdiction in which the installation is located and comply with any applicable requirements of such laws, (e.g., securing required licenses or permits). **(T-0)** In locations outside the U.S., raffles must be held in accordance with host nation laws and applicable Status of Forces Agreements. **(T-0)**

10.20.4. Raffles must be held to support the Private Organization's routine operations or for the direct benefit of Department of Defense personnel or their family members. **(T-1)** Raffles may not be authorized to raise money for an outside cause local or national group, such as local regional or national charities (including the Combined Federal Campaign). Raffles may be utilized for the benefit of the Air Force Assistance Fund if 100% of the proceeds are donated to the Fund. See AFI 36-3101, section C. **(T-1)**

10.20.4.1. Requests for approval to conduct raffles must identify the purpose for which funds are being raised and the intended use of the proceeds. (T-3)

10.20.4.2. Raffles conducted strictly for a monetary prize are not authorized on the installation. (T-1) Monetary raffles conducted of the installation by the Private Organization must comply with the guidance in [paragraph 10.20.3](#).

10.20.5. Raffles must not be officially endorsed or supported except as permitted by JER Sections 3-210 and 3-211. (T-0)

10.20.6. Raffles must not be conducted in the workplace. Unlike Private Organization fundraisers involving the sale of goods and consumables, which may be conducted at public entrances and in community support facilities such as the lobby of the Base Exchange, raffles must be carefully planned so as not to spill over beyond the members of the Private Organization and any affiliated unit. (T-2) Raffles on the Pentagon reservation are prohibited. (T-0)

10.20.7. Raffles must not be conducted by military members or civilian employees during their duty time. (T-1) Military members may not conduct raffles while in uniform at any time. (T-1) Air Force personnel may participate in Private Organization fundraising raffles only in a purely personal, unofficial, volunteer capacity at authorized locations and in ways that do not imply official endorsement. (T-1)

**11. Logistical Support.** Private Organizations must furnish their own equipment, supplies, and other materials. (T-1) Newly elected Private Organization officers must consult Force Support Squadron Resource Manager for guidance and training on local installation requirements and procedures because Private Organizations generally do not get either Appropriated funds or Nonappropriated funds support except where specifically identified in this instruction. (T-1)

**11. (ANG) Logistical Support.** POs must furnish their own equipment, supplies, and other materials. (T-1) Newly elected PO officers must consult the Base Services Manager for guidance and training on local base requirements and procedures because POs generally do not get either APF or NAF support except where specifically identified in this AFI and Supplement. (T-1)

11.1. Private Organizations may be provided venues to conduct meetings of reasonable duration and frequency.

11.1.1. A Private Organization must reimburse for services (to include utilities) when it uses a facility or space on a non-exclusive, other-than-occasional basis unless a separate directive or instruction authorizes non-reimbursable support. Thrift shops are exempted from the requirement to pay utilities under such circumstances. (T-1) A Private Organization must reimburse for any additional costs incurred by the Air Force resulting from such uses (e.g., incremental increases in maintenance and janitorial expenses). (T-1)

11.1.2. The Air Force mandates an approved out-grant (i.e., lease or license) when a Private Organization has exclusive use of a facility, space, or land area. Any reimbursement for utilities will be determined in accordance with Air Force Instruction 32-1061, *Providing Utilities to United States Air Force Installations*. Any fair market value reimbursement (“rent”) for space occupied, maintenance, and other support will be determined in accordance with Air Force Instruction 32-9003, *Granting Temporary Use of Air Force Real Property*. Private Organization activities that provide a benefit to the entire

installation (e.g., a used uniform shop within a thrift store) may make all or part of their rental payment in-kind.

11.1.3. The use of Government equipment and systems for other than official purposes is extremely limited. Government communication systems (e.g., weekly upcoming events email from the installation Public Affairs Office) may be used to inform Airmen of Private Organization events of possible interest to the unit and its families (e.g., regular meeting of the unit-affiliated spouses' club). Official communication systems should not be used to advertise Private Organization fundraiser (and membership) events unless the primary purpose of the communication is for other than support of the Private Organization's efforts, but rather to notify unit Airmen of a local event of possible interest (e.g., lunchtime sale of food in a public area adjacent to the unit's geographic footprint). **(T-2)**

11.1.4. Installations are encouraged to hold information fairs to educate Private Organizations on the requirements of this instruction and resources available to them on the installation.

11.2. Private Organizations in overseas areas can request additional logistical support such as: reimbursable transportation services; commissary; Armed Forces postal services; exchange; recreational activity privileges; reimbursable space-available hospitalization, medical, and dental care; and dependent school service. Requests must be forwarded through the Installation Commander to the Air Force Services Activity (Installation Support). **(T-1)** For Services support, the approval authority is the Air Force Services Activity Commander. For all other functional support, the Air Force Services Activity will coordinate with the senior Major Command owning functional(s) or Air Force Installation Mission Support Center functional(s) for their approval. As part of the forwarding recommendation, the Installation Commander must include a statement acknowledging the commander can provide the additional support requested within available resources and without degrading the installation's ability to fulfill its mission. The request must include:

11.2.1. A cost estimate for the additional support. **(T-1)**

11.2.2. A list of services, programs, and activities the Private Organization provides that warrant additional support. **(T-1)**

11.2.3. An acknowledgement by the Private Organization that additional support may be terminated if the Private Organization's services, programs, and activities change so that they no longer warrant the support. **(T-1)**

**12. Dissolution of a Private Organization.** When a Private Organization decides to dissolve or shut down, it must:

12.1. Use its funds to satisfy any outstanding debts, liabilities, or obligations. **(T-1)**

12.2. Dispose of the residual balance as decided by the Private Organization membership. **(T-1)**

12.3. Notify the Force Support Squadron Commander/Director of the intent to dissolve the Private Organization and prepare a time-phased action plan to do so. **(T-1)**

12.3. **(ANG)** Notify the Base Services Manager or the Force Support Squadron Commander

of the intent to dissolve the PO, prepare a time-phased action plan to do so, and give a copy of the plan to the Base Services Manager for file. (T-1)

SHON J. MANASCO  
Assistant Secretary of the Air Force  
(Manpower and Reserve Affairs)

(ANG)

APRIL D. VOGEL, Brigadier General, USAF  
Director, Manpower, Personnel, Recruiting and  
Services



**Attachment 1****GLOSSARY OF REFERENCES AND SUPPORTING INFORMATION*****References***

DoDI, 1000.15, *Procedures and Support for Non-Federal Entities Authorized to Operate on DoD Installations*, 24 October 2008

DoDI 1015.9, *Professional U.S. Scouting Organization Operations at U.S. Military Installations Located Overseas*, 19 January 2016

DoDI 1402.05, *Background Checks on Individuals in DoD Child Care Services Programs*, 11 September 2015

DoD 5500.07-R, *Joint Ethics Regulation*, 30 Aug 93, with changes 1 through 6

DoD 7000.14-R, *DoD Financial Management Regulation*, Volume 11A, Chapter 4, *User Charges*

AFI 32-1061, *Providing Utilities to US Air Force Installations*, 27 January 2016

AFI 32-9003, *Granting Temporary Use of Air Force Real Property*, 19 August 1997

AFI 34-108, *Commercial Sponsorship and Sale of Advertising*, 21 August 2018

AFI 34-219, *Alcohol Beverage Program*, 30 September 2016

AFI 36-2706, *Equal Opportunity Program Military and Civilian*, 5 October 2010

AFI 36-3101, *Fundraising Within the Air Force*, 9 October 2019

AFI 51-601, *Gifts to the Department of the Air Force*, 26 November 2003

AFMAN 34-201, *Use of Nonappropriated Funds (NAFs)*, 28 September 2018

Army Regulation (AR) 210-22, *Private Organizations on Department of the Army Installations*, Date, 22 October 2001

***Prescribed Forms***

Air Force Form 847, *Recommendation for Change of Publication*

***Adopted Forms***

None

***Abbreviations and Acronyms***

**AF**—Air Force

**(Added-ANG) AFAA**—Air Force Auditing Agency

**AFI**—Air Force Instruction

**AFMAN**—Air Force Manual

**(Added-ANG) ANG**—Air National Guard

**DoDI**—Department of Defense Instruction

**DoDD**—Department of Defense

**(Added-ANG) DRU**—Direct Reporting Unit

**(Added-ANG) DSCs**—Dining Social Clubs

**(Added-ANG) FOA**—Field Operating Agency

**(Added-ANG) IMT**—Information Management Tool

**(Added-ANG) POC**—Point of Contact

**USAF**—United States Air Force

**(Added-ANG) USPFO**—United States Property & Fiscal Officer

### *Terms*

**Dram Shop theory**—A theory of legal liability under which servers of alcoholic beverages (facility owner, operator or employee) can be held liable for damages when they continue to serve alcoholic beverages to a customer who reaches or appears to be nearing the point of intoxication and the customer then brings harm to property, the customer or others.

**“For us, by us” fundraising**—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. (This includes most Morale, Welfare and Recreation programs, regardless of funding sources, as well as Unit Unofficial Activities).

**Attachment 2 (ADDED-ANG)**  
**COMMANDER'S CHECKLIST**

**A2.1. (ADDED-ANG) Commander's Checklist** . This checklist is used annually to ensure compliance with regulatory guidance for Unofficial Activities or Private Organizations. All references refer to AFI 34-223, unless otherwise stated.

**Table A2.1. (ADDED-ANG) Commander's Checklist.**

ACTION	YES	NO
1. Does the Unofficial Activity comply with the limitation on current monthly assets (cash, receivables, investments, etc., must not exceed a monthly average of \$1,000 over a three-month period)? If not, the activity must become a Private Organization, discontinue on-base operations, or reduce its current assets. (Paragraph 2.2.)		
2. Does the Unofficial Activity/Private Organization engage in sales/services that duplicate or compete with Army and Air Force Exchange Service (AAFES) or Services activities? If yes, they must be discontinued. (Paragraph 10.8.)		
3. Does the Unofficial Activity/Private Organization engage in frequent or continuous resale activities or operate amusement or slot machines? If yes, they must be discontinued. <b>NOTE:</b> This prohibition does not preclude collective purchasing/sharing of purchased items consumed by members of the unofficial activity. (Paragraph 10.9.)		
4. Does the Unofficial Activity/Private Organization serve or sell alcoholic beverages? If yes, it must be discontinued. (Paragraph 10.14.)		
5. Are members of the Unofficial Activities/Private Organizations complying with applicable federal and state regulations, and federal, state, and local laws and tax laws? If not, they must comply. (Paragraph 10.17.)		
6. Are duties associated with Unofficial Activities/Private Organizations assigned/detailed to military or civilian employees? If yes, they must be discontinued and the duties/schedules conducted by volunteers. (Paragraph 1., and 5., CFR 2635.702, and 5 CFR 2635.705 in the Joint Ethics Regulation and AFI 34-223, paragraph 1 and 9.)		
7. Does the Force Support Squadron or Services Flight co-sponsor events with Unofficial Activities/Private Organizations for the purpose of obtaining commercial sponsorship, contributions, donations, gifts, advertising or generating revenue for them? If yes, this must be discontinued. (Paragraph 10.19.1.1.)		
8. Does the Unofficial Activity/Private Organization solicit commercial sponsorship? If yes, it must be discontinued since the benefit of commercial sponsorship donations are not available to the Air National Guard. (Paragraph 10.19.1.2. and AFI 34-108, Commercial Sponsorship and Sale of Advertising, Paragraph 1.4)		

9. Does the Unofficial Activity/Private Organization conduct games of chance, lotteries, raffles, or other gambling-type activities? If yes, they must be discontinued. Only fund-raising raffles that meet the criteria in Paragraph 10.16. are permitted. (Paragraph 10.20.)		
10. Does the Unofficial Activity engage in actions or activities that need commercial insurance based on a risk evaluation? (See Paragraph 10.15. for private organization guidance and unofficial activity considerations)		
11. Does the Unofficial Activity/Private Organization furnish administrative support, equipment, supplies, and other materials at their own expense? If no, they must do so. (AFI 34-223/ANG Sup 1, Paragraph 11.)		
12. Are the Force Support Squadron Commander and Base Services Manager monitors of the base Unofficial Activities and Private Organizations? (AFI 34-223/ANG Sup 1, Paragraphs 6 and 7.1., and 7.2..)		
13. Has the annual review of Private Organizations/Unofficial Activities been conducted and documented? (AFI 34-223/ANG Sup 1, Paragraph 7.1 and 7.2)		
14. Has a “life of the fund” or perpetual file been established and maintained for each Private Organization/Unofficial Activity? (AFI 34-223/ANG Sup 1, Paragraphs 7.1, 7.2, and 9.)		
15. Does the installation commander require all base unit commanders to certify compliance annually with regulatory guidance for their Unofficial Activities and/or Private Organizations? (AFI 34-223/ANG Sup 1, Paragraph 5.7. (Added) )		
16. Does the installation commander check all other Unofficial Activities / Private Organizations that exist on the installation, but are not attached to or associated with any particular unit? (AFI 34-223/ANG Sup 1, Paragraph 5.8. (Added) )		