

**Private Org (PO) Ethics**  
Quick Reference Guide – USAFWC/JA

**References**

- **AFI 34-223** (8 Mar 2007) – *Private Organizations (PO) Program*
- **AFI 36-3101** (12 Jul 2002) – *Fundraising Within the Air Force*
- **Joint Ethics Regulation 3-201**
- **5 C.F.R. 2635.808**

**Fundraising**

- Fundraising is the asking of money or sale of items benefitting an organization OR active participation in the promotion of an event in support of an organization.
- In official capacity:
  - DoD personnel can fundraise if authorized by statute, Executive Order, or agency regulation.
  - DoD personnel may not solicit funds or endorse the sponsoring/beneficiary organization (except as allowed in the JER).
- In personal capacity:
  - Personnel may not use official titles, use authority of offices, solicit money from subordinates or prohibited sources (DoD contractors), use Government resources (official email, GOVs), wear your uniform when participating in a fundraising event, or solicit in the Federal workplace.
  - Military personnel and DoD civilians may never solicit, accept, or receive funds for partisan political activities.
- Employees are allowed to officially endorse fundraising for employee organization welfare funds.
  - Fundraising events may not be held during CFC or AFAF.
- PO Prohibitions
  - Must not engage in activities that duplicate or compete with activities of the Army and AAFES or Services NAFIs.
  - Must not engage in frequent or continuous resale activities either directly, through third parties, or in their media.
  - May not engage in any conduct which has the effect of advertising for, making referrals to, or encouraging use of any commercial business concerns.
  - Must comply with all applicable federal, state, local, and foreign laws governing like civilian activities.
  - May not solicit funds for their organizations on base.
  - May not wear the uniform when participating in a fundraising event.
- Air Force leaders may not encourage subordinates to support a fundraising effort being conducted by a NFE.

**Solicitation**

- Definitions:
  - Solicit: to ask for.
  - Personally Solicit: a request, encouragement of donations, or other support through person-to-person contact or through the use of one's name or identity in correspondence or permitting its use by others.
  - Prohibited Sources: include DoD and Air Force contractors as well as their employees.
- Air Force members and employees may not solicit money, gifts or prizes in their official capacity for any Air Force programs, private organizations, unofficial activities, or special events, absent specific statutory or regulatory authority.
- Air Force employees may not solicit a gift or gift(s) from an organization outside the government to support an Air Force event.
- Improper Solicitation:
  - If a non-Federal entity (NFE) has offered to contribute to one or more specified Air Force event and has not offered to contribute to another Air Force event, then asking that organization if it will contribute to another is improper.
  - If an NFE has made no offer and expressed no interest in making a contribution to any Air Force event or activity, then a request to that organization for a gift or contribution is improper.
  - If a NFE has offered to contribute to one *category* of Air Force events or activities and has not offered to contribute to any other events or activities, then asking that organization if it will contribute to other Air Force events and activities is improper.
- If a NFE offers to contribute (or expresses interest in contributing), to *any* official base event or activity, a request for support for *any* official base event or activity would not be "solicitation" and would be permissible.

**Raffles**

- NRS 462 discussed the general provisions required to conduct charitable lotteries (raffles) in the state.
- PO must qualify as a charitable organization under NRS 462.075
  - "Charitable or nonprofit activity" means an activity in support of the arts, amateur athletics, peace officers or health or social services, or conducted for any benevolent, civic, educational, eleemosynary, fraternal, humanitarian, patriotic, political or religious purpose, including the operation of a qualified organization.
- Nellis and Creech PO's have been recognized by the Gaming Control Board as non-profit organizations.
- If PO lotteries/raffles are restricted to the base and all tickets are sold only to members of the organization or family members (NO tickets sold to members of outside PO's/organizations) then requirements to advise the board of each event is not necessary.
- If the PO event will be off base (at a member's home, restaurant, etc.)
  - Fill out application on GCB website: <http://gaming.nv.gov/>
  - Email the application to the Gaming Control Board at [ops@gcb.nv.gov](mailto:ops@gcb.nv.gov)

**Gifts**

- DoD personnel shall not solicit, fundraise for, request, or encourage the offer of a gift to DoD and that acceptance authorities shall not accept gifts offered contrary to this policy. However, once an offer has been initiated by a non-Federal entity (NFE), Air Force personnel may follow up with specific guidance and information, to include installation needs.
- Certain Air Force officials may accept gifts on behalf of the Air Force, but only if the gift is unsolicited, the gift is handled, and a designated official formally approves acceptance.

## FAQs for Fundraisers

- 1. What is the difference in “official fundraising,” “unofficial fundraising,” and “fundraising for employee organization welfare funds”?**
  - a. Official fundraising: If all funds raised by an event or effort will go to a Combined Federal Campaign (CFC), Air Force Assistance Fund (AFAF), Army Emergency Relief, Navy-Marine Corps Relief Society, or an OPM-approved emergency or disaster appeal, the event or effort is considered to be “official fundraising.”
    - i. If you are involved in an official fundraising campaign, you may use government time, equipment, and supplies. You may endorse official fundraising efforts in statements and on web sites and other promotional materials. You may use (and allow others to use) your government title and organization name in support of these fundraising efforts.
  - b. Unofficial fundraising: If any part of the raised funds will go to an organization or effort other than those listed above for official fundraising, the event or effort is “unofficial” fundraising. Fundraising includes asking someone for a monetary contribution. It also includes circulating an order form for holiday gift wrap or cookies.
  - c. Fundraising for employee organization welfare funds: The guidelines for fundraisers in this category are generally the same as for unofficial fundraisers. Fundraising for employee organization welfare funds is carried out by a unit or organization comprised solely of DOD employees or their dependents, and conducted among the members of the unit or organization for the benefit of welfare funds for the members of the unit or organization.
- 2. How do I begin the process to get my organization’s fundraiser approved?**
  - a. Please contact either Patricia Vendetti at [patricia.vendetti@us.af.mil](mailto:patricia.vendetti@us.af.mil) or Brandi Gallegos at [brandi.gallegos@us.af.mil](mailto:brandi.gallegos@us.af.mil) for the Fundraiser Request Forms.
- 3. Can my organization conduct an unofficial fundraiser on-base?**
  - a. **Yes**, you may conduct on-base fundraising efforts on personal time if base officials have approved the event and the event will take place away from the workplace.
- 4. What areas are considered a workplace?**
  - a. For fundraising purposes, the workplace includes offices, hangars, and the flight line. Away from the workplace includes base quarters, entrances, lobbies or concourses of buildings, schools, and chapels.
- 5. How often can my organization hold a fundraiser?**
  - a. A private organization (PO) or unofficial activity (UA) may hold two fundraisers per quarter. A fundraiser should only be one day in length or two days in length if the PO or UA plans on holding only one fundraiser that quarter.
- 6. What dates are off limits for holding fundraisers?**
  - a. Fundraisers cannot be held during the CFC or AFAF.
  - b. Exceptions:
    - i. Fundraising events for employee organization welfare funds that will be held away from the workplace may be held during the CFC or AFA, as long as it does not detract from the CFC or AFAF campaigns, and the fundraiser has been approved.
    - ii. Fundraisers in which all funds raised are donated to the CFC or AFA campaigns.
- 7. Can I wear my uniform while participating in an unofficial fundraiser?**
  - a. **No**, you cannot wear your uniform. You may participate in unofficial fundraising activities in your personal, off-duty capacity if you act exclusively outside the scope of your official position.
- 8. Can I participate in an unofficial fundraiser during the work day?**
  - a. **No**, you may not use official time to support an unofficial fundraising event or effort (including using official time to serve on a planning committee, advisory board, or oversight board).

**9. Can I endorse an unofficial fundraiser?**

- a. **No**, you may not officially endorse or appear to endorse non-federal organizations or their events, products, services, or enterprises (including fundraising events). Also, you are prohibited from endorsing or appearing to endorse unofficial fundraising efforts. Thus, you may not officially and publicly praise an unofficial fundraising event or encourage other employees to support it.

**10. Can I endorse fundraisers held for employee organization welfare funds?**

- a. **Yes**, employees are allowed to officially endorse fundraising for employee organization welfare funds.

**11. How can I advertise my unofficial fundraiser?**

- a. Air Force employees should avoid using official email systems to inform other employees about unofficial fundraising activities unless approved by the organization's commander. Commanders can publicize off-base fundraising activities, requests for volunteers, etc., in daily bulletins, base radio or television stations, or on bulletin boards. Commanders may not discriminate among organizations. It is not appropriate to publicize any organization during CFC or AFAF.

**12. I want to print flyers to advertise my organization's fundraiser. Is there a disclaimer that needs to be added to my flyer?**

- a. **Yes**, all print media must contain the following disclaimer: "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."

**13. Can I use my government resources to support an unofficial fundraiser?**

- a. **No**, you may not use government resources (e.g., funds, equipment, vehicle, supplies, postage) to support an unofficial fundraising event or effort.

**14. Can I use "Nellis Air Force Base" or a similar use of the name in connection with my unofficial fundraiser?**

- a. **No**, you may not use (or allow others to use) your official title or the name of your government organization in connection with an unofficial fundraising event or effort. However, private organizations and unofficial activities operating on Air Force installations may use the name or abbreviation of the DoD, an Air Force organizational unit, or installation in the PO name provided that the status as a PO is apparent and unambiguous.

**15. Can I solicit funds from my co-workers in my workplace to support an unofficial fundraiser?**

- a. **No**, you may not ask or allow subordinates or junior personnel to use their official time in support of an unofficial fundraising event or effort. You may not solicit funds, the purchase of items (such as tickets), or other support (e.g., personal time) from subordinates in connection with an unofficial fundraising event or effort. Again, unofficial fundraisers should not take place in the workplace.

**16. Can my organization hold a fundraiser that competes with AAFES?**

- a. **No**, POs and UAs cannot engage in activities that duplicate or compete with activities of AAFES without first receiving permission from AAFES. For instance, an organization cannot sell t-shirts without first contacting AAFES to make sure AAFES does not object to the organization's source for the t-shirts.