

USE OF MWR FACILITIES BY NON-FEDERAL ENTITIES



What is a Non-Federal Entity?



Joint Ethics Regulation:

“A non-Federal entity is generally a self-sustaining, non-Federal person or organization, established, operated and controlled by any individual(s) acting outside the scope of any official capacity as officers, employees or agents of the Federal Government. “

Examples

- ❑ Navy League
- ❑ Boeing Aircraft Corp.
- ❑ Privatized Housing LLC
- ❑ Senior Chief's Association
- ❑ Wife's Club
- ❑ Navy Federal Credit Union
- ❑ Combined Federal Campaign
- ❑ USO
- ❑ State or Municipal Government

Restrictions on Interactions with NFEs

- ❑ Preferential treatment of an NFE
- ❑ NFEs operating on an installation
- ❑ Special status NFEs
- ❑ Official participation in NFEs
- ❑ Personal participation in NFEs
- ❑ Competition between NFEs and MWR
- ❑ Commercial Sponsorship by NFEs
- ❑ Fundraising by NFE on base
- ❑ Endorsement of an NFE

Restriction: Commercial Sponsorship

- ❑ Defined: providing promotional, marketing, advertising or other publicity opportunities to commercial entities.
- ❑ Only MWR can conduct commercial sponsorship on an installation
- ❑ No restrictions off-installation
- ❑ “Sponsor Recognition” is not commercial sponsorship/advertising

Limited Situations

- Contracted entertainment has pre-existing sponsor
- NFE's contract for exclusive use of MWR facilities:
O-Club/Bowling Alley/ Golf Course
 1. Event is for members/guests of NFE
 2. Recognition is passive in nature (signs, print, podium)
 3. Recognition is aimed only at event attendees
 4. Recognition is limited to event site

Restriction: Fundraising

- Fundraising on installations is subject to a number of number of different rules
- Fundraising is not defined
- Providing logistic support to NFEs—can be done
- Providing logistic support to NFEs for fundraising is problematic
- Providing service-for-a-fee is not logistic support

Restriction:

Endorsement of NFE Fundraising

- Employees cannot endorse or appear to endorse a fundraiser
- Exceptions: CFC, NMCRS, OPM approved disaster relief
- Its personal
- No signs in pro shop; heads, locker rooms
- Don't handle event registration
- “Private Outing”
- ..what they do in the privacy of their own tee box