Text as published on gao.gov, https://www.gao.gov/products/b-154456, archived 2026-10-11. GAO published no original file for this decision. Rendered by Comptroller Desk.

B-154456 August 11, 1964

Number: B-154456

Date: 1964-08-11

B-154456 August 11, 1964

The Honorable Genard P. Lipscomb House of Representatives

Dear Mr. Lipscomb:

This is in reference to your letter of June 11, 1964, with enclosures, concerning a Department of the Navy fund drive for the John F. Kennedy Library. You request to be advised whether any appropriated funds are being expended for the fund drive for such purposes as postage, supplies, etc. In addition, you requested any comment our office can appropriately supply as to what authority the Department of the Navy possesses to expend funds for the activity.

We have been informed by the Department of the Navy that the drive was undertaken as a part of the campaign authorized by the Secretary of Defense, which campaign parallels those of other departments and agencies of the Government, and that in view of this, and considering the endorsement of the President and the bi-partisan leadership of the Congress it was deemed appropriate to describe the drive as "official." The Department reported that the bulk of the material required for the conduct of the drive was provided by the Library Committee but certain costs were incurred incident to the preparation of campaign instructions and special mailing labels and to be distribution of campaign materials. Such functions were performed by the Defense Printing Service, and the Navy was charged $1,678.26 for them. The Department also reported that no additional costs were incurred for postage, and no additional employees were hired for the conduct of this one-time special drive. It was stated by the Department that inasmuch as this campaign received strong support from both the Executive and Legislative branches of the Government and in view of the fact that it was conducted on a purely voluntary basis, it was believed appropriate to afford members of the Department of the Navy the same opportunity to contribute to this proposed memorial as has been given to private citizens throughout the United States.

The campaign carries the endorsement of the Speaker of the House of Representatives who directed the establishment of a committee to solicit members and their staff, and the endorsement of Congressman Joseph W. Martin, Jr., former Speaker of the House of Representatives. (See Congressional Record of May 5, 1964, page 9711.) Also, President Johnson, as honorary chairman of the Library, has indicated his interest and support. As additional support to the view of the Department of the Navy that the fund-raising drive was an activity of an official nature, it is observed that once the Library is built by public subscription, it will, we understand, be transferred to the United States Government. The statutory authority for such action is set forth in section

507(f) of the Federal Property and Administrative Services Act, as amended, 44 U.S.C. 397(f).

It has been a long-established practice for Government agencies to cooperate in charitable fund-raising campaigns for health and welfare related to these campaigns, governed by Executive Order No. 10927 and instructions promulgated pursuant thereto by the Civil Service Commission, are known to the Congress, and being viewed as incident to the fulfillment of the responsibility of employers and employees to contribute to the welfare of the community have not been questioned by our Office. See, for example, B-119740, July 29, 1954, copy enclosed . The fund-raising campaign for the John F. Kennedy Library appears of a civic nature rather than one for health and welfare. However, as indicated by the bi-partisan support of Congress, the interest and support of the President, and the plans for transfer of the Library to the Government, the campaign apparently is an activity which the Government is interested in encouraging.

While, in our opinion, the practice of fund-raising activities for health and welfare activities should not be extended to other types of activities except where there is a clear indication of the Government's interest, we believe that such an interest has been shown in this particular case.

We trust that the information furnished will serve the purpose of your inquiry.

Sincerely yours,

Joseph Campbell Comptroller General of the United States