



**DEPARTMENT OF THE AIR FORCE
502D AIR BASE WING
JOINT BASE SAN ANTONIO**



13 December 2019

MEMORANDUM FOR JBSA PRIVATE ORGANIZATION LEADERS

FROM: 502 FSG/JA

SUBJECT: Biennial JBSA Private Organization Constitution and Bylaws Review

1. We have reviewed the process of each JBSA-approved Private Organization's request for recertification, which is to be submitted at least every two years. The requirement is in AFI 34-223, *Private Organizations*, and is waivable only at the very high (T-1) threshold. That authority has not waived the requirement, so it is the affirmative duty of each JBSA-approved Private Organization's leadership to submit its request for certification every two years.

2. AFI 34-223, para. 9.3 clearly states the requirement:

The organization's request for recertification must be submitted 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)

3. AFI 33-360 defines the tier waiver authority. It places (T-1) at the highest level within the Air Force. (T-0 means the waiver authority is above the Air Force, for example the President or Congress.) (T-1) waiver authority is at the Department of the Air Force, though it is delegable to a MAJCOM Commander.

4. The biennial requirement to submit the request for recertification has not been waived and is not waivable at the JBSA level.

5. The requirement is an affirmative duty of each JBSA-approved Private Organization's leadership. Like the decision to submit the initial request to operate as a JBSA-approved Private Organization, the decision to do so rests entirely with the Private Organization's leadership. The Air Force does not force any group to submit the initial request to operate. Similarly, if a Private Organization's leadership decides not to resubmit a request for certification at any two year point, then its approval to operate on JBSA will lapse.¹

¹ This affirmative responsibility of each JBSA-approved Private Organization's leadership also extends to their duty to resubmit the request for certification if there is a change in the purpose, function, or membership eligibility of the Private Organization. 502 FSS personnel and other government officials have no duty to reach out and check if any JBSA-approved Private Organization has had a triggering change.

6. 502 FSS personnel and others may remind a JBSA-approved Private Organization of the requirement to submit for recertification and even that its two year point is approaching. **But such a reminder is simply a courtesy.** AFI 34-223, no other Air Force Instruction, the Air Force Services Guide to Private Organizations, the AETC Guide to Private Organizations, and the JBSA Guide to Private Organizations do not require 502 FSS personnel or others to notify a JBSA-approved Private Organization of the biennial requirement. If a courtesy reminder is not given in a particular case, it has no impact on the requirement. The Private Organization's leadership is charged with knowing of the biennial requirement, knowing when its two year point is approaching, and submitting its request for recertification early enough to allow time for it to be reviewed and approved so the Private Organization can seamlessly continue operating on JBSA.



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