

# HAPAC CAMPAIGN PACKET 2017







# 2016 ANNUAL REPORT

The 2016 HAPAC Campaign received hospital contributions and fundraising support totaling \$93,262.18. Congratulations to the following hospitals for having met or exceeded their 2016 goal!

## **ANMED HEALTH**

\$12,245 (245%)

Bill Manson, CEO

## **THE CAROLINA CENTER FOR BEHAVIORAL HEALTH**

\$1,000 (100%)

John Willingham/CEO

## **EDGEFIELD COUNTY HOSPITALS**

\$1,000.00 (100%)

Carlos Milanes, CEO

## **LIGHTHOUSE CARE CENTER OF CONWAY**

\$1,000 (100%)

Thomas Ryba/CEO

## **PALMETTO HEALTH**

\$12,315 (130%)

Charles Beaman, CEO

## **PALMETTO LOWCOUNTY BEHAVIORAL HEALTH, LLC**

\$1,000 (100%)

Clint Hauger/CEO

## **PROVIDENCE HEALTH**

\$3,500 (100%)

Scott Campbell, CEO

## **THE REGIONAL MEDICAL CENTER**

\$2,400 (120%)

Tom Dandridge, President/CEO

## **SPARTANBURG REGIONAL HEALTHCARE SYSTEM**

\$5,000 (100%)

Bruce Holstein, President/CEO

## **ROPER ST. FRANCIS HEALTHCARE**

\$9,280 (186%)

Lorraine Lutton/CEO

## **SELF REGIONAL HEALTHCARE**

\$5,750 (164%)

Jim Pfieffer, President/CEO

## **THREE RIVERS BEHAVIORAL HEALTH**

\$1,000 (100%)

Nan Lewis/CEO

## 2016 SPECIAL RECOGNITION

## **SCHA SOLUTIONS**

\$6,000

## **PHT SERVICES, LTD.**

\$4,500

## **PALMETTO HOSPITAL TRUST**

\$1,000

## **PALMETTO HEALTHCARE LIABILITY INSURANCE PROGRAM**

\$1,000

# LIST OF INDIVIDUAL CONTRIBUTIONS

## HAPAC WOULD LIKE TO THANK OUR 2016 INDIVIDUAL CONTRIBUTORS!

### CONTRIBUTION LEVELS

#### Ben Franklin

\$1,000 and up

#### Chairman's Circle

\$500 – \$999

#### Capitol Club

\$350 – \$499

#### Palmetto Club

\$100 – \$349

#### Crescent Club

\$20 – \$99

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William Kibler, Jr. • Capitol Club  
Stoney Abercrombie • Palmetto Club  
James Boseman • Palmetto Club  
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Marty Stewart • Palmetto Club  
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Patricia White • Palmetto Club  
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Elaine Epstein • Crescent Club  
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Sonya Gould • Crescent Club  
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Tara Hicks • Crescent Club  
Mary B. Hobbs • Crescent Club  
Greg Kahaly • Crescent Club  
Thomas C Kickham, DO • Crescent Club  
Hilda Lindley • Crescent Club  
Joe Martin • Crescent Club  
Robert Pierce • Crescent Club  
Jody Phillips • Crescent Club  
Teresa Threlkeld • Crescent Club  
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Penny Tisdale • Crescent Club  
Juana Slade • Crescent Club  
Joshua Wentzky • Crescent Club  
Arnold "Sonny" Wyatt, Jr. • Crescent Club

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Ronnie Hyatt • Chairman's Circle  
J. David Sudduth • Palmetto Club

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Sean Dardeau • Palmetto Club

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Ryan Hall • Palmetto Club  
Jay Hamm • Palmetto Club  
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Emilie Keene • Palmetto Club  
Sarah Kirby • Palmetto Club  
Lynn Lambert • Palmetto Club  
James Lathren • Palmetto Club  
Mark Loos • Palmetto Club  
(Bryan) Todd Miller • Palmetto Club  
Satish Prabhu • Palmetto Club  
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## **PROVIDENCE HEALTH**

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## **THE REGIONAL MEDICAL CENTER**

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Carolyn Donohue • Chairman's Circle  
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William Isenhower, MD • Chairman's Circle  
F. Gregory Mappin • Chairman's Circle  
Todd Tamalunas • Chairman's Circle  
Craig White • Chairman's Circle  
Mike Dixon • Palmetto Club

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Elizabeth Powers Harmon • Capitol Club  
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Elizabeth Burt • Palmetto Club  
Tommy Cockrell • Palmetto Club

Eva Foussat • Palmetto Club

Maurice Kaiser • Palmetto Club

Melanie Matney • Palmetto Club

Krista Ordemann • Palmetto Club

Meagan Murphy • Crescent Club

Tammy Pope • Crescent Club

## **SPARTANBURG REGIONAL HEALTHCARE SYSTEM**

Spartanburg Regional Healthcare •

Ben Franklin Club

## **SPRINGS MEMORIAL HOSPITAL**

Janice Dabney • Chairman's Circle

The Carolina Center for Behavioral Health •

Ben Franklin Club

## **TIDELANDS HEALTH**

Bruce Bailey • Ben Franklin Club

Julian A Reynolds Jr. • Palmetto Club



# LEGAL DO'S AND DON'TS

**Please review the following Federal and State election laws that impact your HAPAC Campaign.**

## **FEDERAL FUNDRAISING EFFORTS: AHAPAC**

- Each CEO of any hospital that is a member of the AHA must sign and return a Prior Authorization card before HAPAC can solicit eligible hospital employees or Board Members. A form is contained in the packet of campaign materials.
- HAPAC solicitation is limited to salaried, management employees with policymaking or managerial responsibilities at an AHA member hospital or health system. Examples include: Vice Presidents, Human Resources Manager, Social Work Director, etc. Board members may also be solicited.
- All solicitation letters on behalf of HAPAC must be sent on your personal (non-hospital) stationary.
- No hospital funds or resources can be used to underwrite HAPAC fund-raising events, mailings or any other activities.\*

## **STATE FUNDRAISING EFFORTS: HAPAC**

- The State HAPAC campaign may receive contributions from individuals, corporations, associations, partnerships and other PACs or businesses.
- There is a \$3500 limit annually on what a donor may contribute to the State HAPAC Campaign.
- There is no limit on contributions to the State HAPAC Operating Account.
- Donors **MUST** include their name, address, company, email address and occupation with their contribution. Individual donors should also include their home address and home phone number.
- Make sure the solicitation card and pre-printed return envelopes to your address or the CEO's address accompany the solicitation letter.
- All checks should be made payable to HAPAC and sent with completed form to: HAPAC, 1000 Center Point Road, Columbia, SC 29210-5802

\* Remember, no hospital funds or resources can be used to underwrite PAC fundraising mailings. HAPAC will be glad to assist any hospital in their fundraising efforts and reimburse for costs incurred. Please contact Carmen Goulet for further information as to how we can help.



# PRIOR AUTHORIZATION FORM



American Hospital Association  
Political Action Committee  
800 10<sup>th</sup> Street, NW  
Two CityCenter, Suite 400  
Washington, DC 20001-4956  
Tel.(202) 638-1100 Fax(202) 626-2332  
<http://www.ahapac.org>

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## Federal Election Commission Prior Authorization Requirement

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The Federal Election Commission (FEC) established federal campaign finance law requiring the American Hospital Association Political Action Committee (AHAPAC), and state hospital associations acting on its behalf, to have prior authorization from the hospital CEO before solicitation of eligible employees of the hospital occurs.

Under Federal law, once the Prior Authorization card is signed, eligible staff can be asked to contribute to the AHAPAC. Hospital employees are eligible if they fall into both of the following categories:

- 1) salaried employees of an AHA and/or state hospital association member hospital, and
- 2) supervisory, managerial/administrative positions with professional responsibilities.

Please be aware that certain state and federal election laws may differ, with state laws being less restrictive in certain areas. If specific questions arise, it may be useful to contact a local attorney.

*Complete the following form and mail to the AHAPAC or fax to (202) 626-2332.*

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### AHAPAC Prior Authorization Form

*Please print the following information or attach business card.*

AHAPAC is authorized as the only federal trade association PAC to solicit contributions from eligible employees of:

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Hospital Name

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Mailing Address, City, State, Zip

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Hospital Executive Name

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Title

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Email (required)

*Please provide signature authorizing for the following year (s) -- approval can be given up to five years in advance:*

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20 (17) Signature

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20 (18) Signature

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20 (19) Signature

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20 (20) Signature

---

20 (21) Signature



# SOLICITATION GUIDELINES FOR 501(C)(3) HOSPITALS

**PERKINS COIE LLP**

POLITICAL LAW GROUP

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## Questions and Answers about Trade Association PAC Activity

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Trade associations like the American Hospital Association have to follow particular rules in establishing and soliciting for their PACs. But those rules are not complicated, and there are not many of them. Once mastered, they are relatively simple to follow.

The basic legal framework for AHA or other association PAC activity is as follows. AHA may solicit its members and the members of its affiliated state associations for contributions to the PAC. Affiliated state associations may assist AHA with the solicitation of these members and the collection and transmittal to AHA of contributions made.

This document will summarize the federal rules governing these activities, and discuss some other issues that have arisen in connection with federal PAC political activity.

### 1. Who Can Be Solicited?

- (a) AHA (or state associations or members soliciting on behalf of AHA) may solicit certain individuals for contributions to their PACs.
  - AHA may solicit its own management;
  - AHA may solicit its members -- whether they are corporate or individual members, but:
    - If it solicits corporate members, it must request permission from the corporation to solicit the corporation's executive and administrative personnel.
    - "Executive and administrative personnel," means those salaried, management employees with policy-making or managerial responsibilities.

- AHA may solicit the members of its affiliated state associations, even if some of those members are not also members of AHA. (The same prior approval rules would apply to any corporate members of a state association.)

**EXAMPLE:** AHA wishes to solicit the management of a hospital that is a member of a state association, but is not a member of AHA. It may do so if the hospital has given the necessary prior approval to AHA for its PAC to solicit.

**EXAMPLE:** AHA wishes to solicit the management of a member hospital that has given permission for the solicitation. In conducting the solicitation, AHA (or state associations or members soliciting on behalf of AHA) may solicit hospital Vice-Presidents and others in a managerial capacity, but not secretaries or members of the clerical staff.

**EXAMPLE:** The solicitation of hospital trustees has raised questions for AHA and its affiliated state associations and members in the past. A recent change in the by-laws of AHA clarified the membership status of individual trustees, who may now be solicited for AHA's PAC.

**EXAMPLE:** A representative of a state association seeking to solicit on behalf of the AHA PAC at an annual meeting must be careful in addressing an audience consisting of both those who have approved an AHA PAC solicitation and those who have not. The existence of the PAC and its function may be noted along with basic statistical information -- how many contributors, what candidates supported, etc. Any promotion or endorsement of its purposes and its function or any encouragement to participate, however, will be considered a "solicitation" directed to non-solicitable persons under the federal law. This prohibition does not apply where the audience is requested to support AHA's nonfederal program, or the nonfederal program of a state association PAC, where the funds solicited are intended for use in state and local, not federal, elections.

- (b) AHA (or state associations or members soliciting on behalf of AHA) may solicit the management personnel of hospitals exempt from tax under 501(c)(3) of the Internal Revenue Code (provided permission is received as discussed below, and the other mentioned limitations are observed).

Non-profit hospitals may permit AHA solicitation of the executive and management personnel, and these personnel may contribute. The hospital may want to make clear it is not taking a position one way or another on whether eligible

executives should contribute and that it is merely affording opportunities for individual employees to participate, if they choose, in the political process. To this end, the 501(c)(3) hospital should not allow the use corporate resources, such as inside mail or conference rooms, to conduct any solicitation or education efforts, unless there is an existing policy of the hospital to allow private or outside use of the facilities for other non-hospital sponsored activities. Any 501(c)(3) employees assisting with the solicitation must do so in their individual capacity (not on behalf of the hospital) on their own time, using their own resources. Meetings to conduct solicitations or provide information on the PAC should not be part of any hospital sponsored meeting (such as a staff meeting), and mailed solicitations are properly directed to executives and management personnel at their home addresses. The hospitals may provide home mailing lists.

**EXAMPLE:** A 501(c)(3) hospital CEO considers calling a special meeting to make possible a solicitation on behalf of AHA PAC. She should not, nor should she authorize a regular meeting to be devoted in part to this purpose.

**EXAMPLE:** Please see the AHA's memorandum on non-profit hospital political activity for a more detailed discussion of these issues.

- (c) AHA PAC may not solicit the PACs established by state associations or hospitals.

PAC to PAC solicitations are prohibited.

- (d) AHA (or state associations soliciting on behalf of AHA) may solicit the management and administrative personnel of affiliated state hospital associations.

Because the AHA and its state associations are considered “affiliated” under the federal campaign finance law, the AHA may solicit the executives of the state associations for contributions to the AHA PAC.

- (e) AHA (or state associations or members soliciting on behalf of AHA) may solicit the management and administrative personnel of a hospital system, as long as the system itself (as opposed to the system’s individual hospitals) is a member of AHA or an affiliated state association in its own right.

As a member of AHA, a hospital system is treated for solicitation purposes like any incorporated member of AHA or its affiliated state associations. Of course, permission to solicit would have to be received before any solicitation could take

place. If the system's hospitals are also members of AHA or an affiliated state association, they may be solicited on the same basis.

## **2. How Can They Be Solicited?**

(a) When soliciting hospitals, AHA must direct the request for permission to solicit to the representative of the hospital with whom the AHA normally deals. This description may fit a number of individuals: it may be any individual within the management structure of the hospital who has the authority to work with AHA on these PAC matters. It does not have to be the President of the hospital, but someone with the delegated authority to bind the hospital with a decision on the permission to solicit.

**Note:** While the law is not altogether clear on this point, a system CEO should not grant permission for a member hospital that is solicitable by AHA. Rather, a responsible management representative of that hospital must grant permission.

(b) The request for permission by AHA must request in clear terms the opportunity to solicit the executives of a solicitable entity for contributions for particular years -- that is, the current or immediately following year, or future years.

If AHA does request permission to solicit for several years, that request must be clearly identify each of the years for which solicitation permission is sought and provide that the approving corporate representative approve with a separate signature for each such year.

The request must also state that the corporation may not approve solicitations by more than one trade association in the same calendar year.

**EXAMPLE:** An AHA member has given permission for AHA to solicit its members for AHA PAC for a particular year. The Federation of America Health Systems (or another trade association) may not also receive permission to solicit the management of that hospital for that same year.

**EXAMPLE:** A CEO has granted permission for AHA PAC solicitations for a 5-year period. If the CEO leaves during that period, the permission still stands, and AHA (or its state associations or members soliciting on its behalf) may continue to solicit the hospital management for AHA PAC.

## **3. When Can They Be Solicited?**

(a) The solicitation may begin immediately following approval in writing by the representative of the hospital whose permission was sought. There is no specific requirement that AHA must have received a copy of the approval before the solicitation begins (though AHA must maintain the properly executed written approval in its records). But -- and this is the basic requirement -- the approval must have been issued by the hospital representative before any oral or written solicitations of company executives have been conducted on behalf of AHA.

Please note: the term “solicitation” is broadly construed under federal law and includes any favorable mention of a political committee and the opportunities it affords for political participation. So a solicitation may be indirect -- and still be a “solicitation” which should not take place until the permission to solicit has been obtained from the corporate member. As noted above, a basic report on PAC activities is acceptable, but any promotion of the PAC and the opportunities it affords for effective political participation would constitute a solicitation. While AHA PAC may accept unsolicited contributions, merely telling someone of that right is, itself, a solicitation.

(b) Once permission is granted, and if the hospital granting permission does not seek to limit the number of solicitations, AHA (or state associations or members soliciting on behalf of AHA) may solicit management as many times as it wishes in the year.

(c) AHA (or state associations or members soliciting on behalf of AHA) must state clearly in any solicitation the political purpose for which the contributions are solicited, and must state also that all contributions are voluntary and will in no way affect the status, terms or conditions of the executive’s employment. If guidelines for contributions are suggested, such as the amount generally expected from executives at certain salary levels, the solicitation must state that the guidelines are only suggestions, and that executives may contribute more, less or not at all, without fear of reprisal or other disadvantage. The solicitation must also inform the contributor that contributions are not deductible for federal income tax purposes.

#### **4. How State Associations and Hospitals Help with Fundraising?**

(a) Hospitals approving a solicitation may distribute AHA solicitations to its management and encourage their participation in meetings or by written communications. **But note:** all encouragement to contribute must be accompanied by the assurances required also of AHA -- that the decision to contribute is voluntary, and that the decision to contribute or not to contribute will have no effect on employment

position. [Note: 501(c)(3) hospitals should consult the memorandum on nonprofit hospital political activity.]

(b) The state associations and/or their PACs also may and do play a role in the process as “collecting agents” -- a term used in the federal law to describe affiliates of a trade association that act as agents in “collecting” contributions and forwarding them to the national association. When the associations solicit contributions for their own PAC activity, or bill members for dues, they may also solicit from those hospitals that have approved AHA solicitations and transmit the contributions they receive to the AHA.

(c) In assisting AHA with fundraising, the state associations and/or their PACs must meet certain legal requirements. These are:

- to transmit the contributions to the AHA in a timely manner;

**Federal law requires that a contribution received should be forwarded to AHA within 30 days if the amount is \$50 or less, and within 10 days if the amount is more than \$50.**

- to report to the AHA in detail the identity of the contributors whose contributions are included in any amount transferred to AHA;
- to maintain records of contribution deposits and transmittals for three years;
- to follow certain procedures for the collection of the contributions prior to transmittal to AHA. Prior to transmittal to AHA, state associations may deposit the money collected for AHA’s PAC in a special transmittal account, in the state association’s account, or in a nonfederal political account. In each case, the state association must maintain separate records of the contributions collected for and transmitted to AHA’s PAC.

The moneys collected may be transmitted to AHA by contributors checks or in a lump sum (in a single check) but the check must be accompanied by a letter or statement detailing the contributors whose moneys make up the amount of the transfer. The detail should include the name and address of each contributor where contribution exceeds \$50 and the date of receipt of the contribution. For any contribution exceeding \$200, the detail should include the occupation of the contributor and name of his or her employer.

(d) Because they are considered affiliated with AHA, a state association may use payroll deduction for contributions by its own executive and administrative personnel to AHA PAC. A hospital or hospital system soliciting on behalf of AHA, however, may **not** use payroll deduction for contributions to AHA's PAC.

## **5. How is State Association PAC Activity Related to AHA PAC?**

AHA's operation of its PAC does not affect the ability of a state association to operate its own PAC. **But** the state association and AHA federal PACs are affiliated - which means that contributions made to one, count also as contributions to the other; and contributions made by one count also as contributions made by the other.

For this reason, a state association with its own federal PAC must keep the AHA informed about the contributions it makes separately to federal candidates, so that the contribution limits shared by the AHA and state association PACs are not exceeded for any candidate by their respective activities.

State law governs a state association's nonfederal PAC.

## **6. Can a State Association (or Hospital) Use its Internet Website on Behalf of AHA's PAC?**

The Federal Election Commission has taken the position that information on an Internet website is the equivalent of "public political advertising." As a result, any information about AHA PAC or federal candidates that is placed on a website is considered communications beyond those whom AHA may solicit. Because of the restrictions on soliciting for AHA PAC, a state association or hospital must be careful in using its site on behalf of AHA PAC. Nonetheless, some information can be made available.

**EXAMPLE:** A member hospital wants to provide information about AHA PAC on its website. It may place basic information about the PAC (names of candidates supported, how many contributors, how many Capital Club members, etc.) on that portion of its site open to anyone. As with other general communications, such as at an annual meeting, the information on the general website should not encourage people to contribute to the PAC or otherwise exhort them to participate.

