

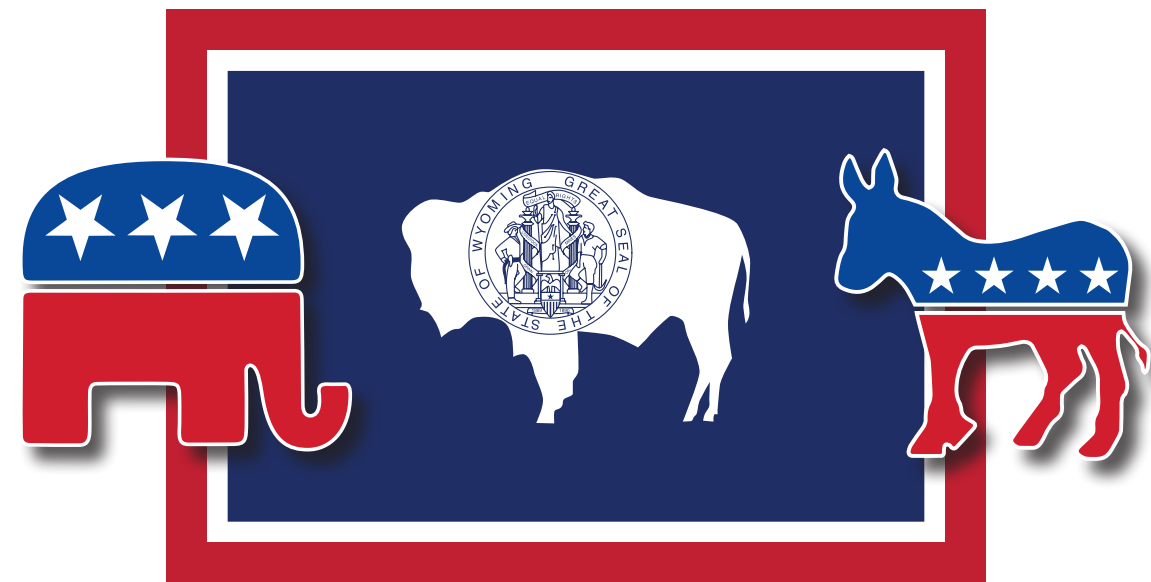
2023 CAMPAIGN PACKET



WHA PAC
WYOMING HOSPITAL ASSOCIATION

What is **WHA PAC** and what does it do?

WHA PAC is a non-profit, non-partisan political action committee that provides Wyoming’s healthcare workers a connection, both at the state and federal levels, to legislators.



WHA PAC makes campaign contributions provided by WHA member facilities and their employees to support both Republican and Democratic candidates who prioritize legislation impacting hospitals, healthcare workers and patients.

In 2022, WHA PAC contributed more than \$15,000 in political contributions.

People like **YOU** can help us with our advocacy work both in Wyoming and in Washington, DC.

CONTRIBUTE TO WHA PAC TODAY!

Health PAC Contributions Form
Wyoming Hospital Association
www.wyohospitals.com



FAQS ABOUT PACS

PAC

WHAT IS A PAC?

A PAC, or Political Action Committee, is a tax-exempt organization used to influence political elections and public policy. PACs provide direct contributions to campaigns for political office and participate in communications activities to persuade public opinion on a candidate or issue.

HOW DOES IT WORK?

PACs pool campaign contributions from a group of members that are used to support the shared interests of that group. Often referred to as “special interest groups,” these organizations have a shared interest to advance a specific product or solution that mutually benefits its members.

WHERE DOES THE MONEY COME FROM?

WHA PACs is restricted to a private class and can only solicit individuals and organizations within that class. For example, WHA PAC can only solicit WHA member facilities and some employees of WHA member facilities.

WHERE DOES THE MONEY GO?

Some of the funding goes directly to candidates for local, state and federal office to use in their respective elections. PAC dollars are also used to fund campaign activities in support of the shared interests of the group, which may include public ads in support of or in opposition to a specific candidate or issue.

WHO MAKES THE DECISIONS?

Like most organizations, PACs are run by a leadership board that directs its fundraising and spending activities. The board is comprised of individuals and member representatives that strategically decide how to advance and protect their shared interest. The WHA PAC Board consists of representation from the WHA Board and WHA member hospitals.

MEMBERSHIP & GOALS

MEMBERSHIP CLUB LEVELS

WHA PAC membership levels are determined by totaling all contributions made to WHA PAC during the 2022 contribution cycle. AHAPAC Clubs are designated with * before club level amounts. For clubs designated benefits please page 7.

Club Levels

1898 Society • *\$5,000 and above	Capital Club • *\$350 – \$499
Champion’s Club • *\$2,500 – \$4,999 Ben	Buffalo Club • \$100 – \$349
Franklin Club • *\$1,000 – \$2,499	Pronghorn Club • \$20 – \$99
Chairman’s Circle • *\$500 – \$999	

Club Members

Hospital executives, managers, medical staff, trustees, administrative employees, volunteers, and vendors are all encouraged to participate in the fundraising campaign.

All contributions are voluntary and have no impact on job status, performance review or compensation. Political contributions are not tax deductible.

GOALS

Each hospital has a contribution goal, which is calculated based on how many full-time employees are employed at the time. Each hospital is asked to contribute \$1 per employee to WHA PAC, with a minimum baseline goal of \$500.

Suggested Contribution Levels

Title	Small Facility	Mid-Size Facility	Large Facility
CEO/Administrator	\$250	\$500	\$1,000
Senior Management	\$100	\$250	\$500
Trustee	\$100	\$250	\$500
Director/Manager	\$50	\$100	\$250
Volunteer	\$25	\$25	\$25

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2022 CONTRIBUTIONS

The 2022 WHAPAC Campaign received hospital contributions and fundraising support totaling \$6,550.00.

Congratulations to the following hospitals for having met or exceeded their 2022 goal!

In 2022 WHA PAC did not have individual hospital goals.	In 2023 WHA PAC individual goals will be \$ 1 per employee.
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SPECIAL RECOGNITION

2022 MVPP	2022 Grassroots Champion
Maureen Cadwell	Timothy Thornell
Carol Solie	

INDIVIDUAL CONTRIBUTIONS

CHEYENNE REGIONAL MEDICALCENTER

Timothy Thornell -Chairman's Circle
Robin Roling-Buffalo Club

Children's Hospital Colorado

Zach Zaslow-Buffalo Club

Cody Regional Health

Douglas McMillan-Buffalo Club

Ivinson Memorial Hospital

Terry Moss-Chairman's Circle

Memorial Hospital of Carbon County

Ken Harman-Capital Club

Memorial Hospital of Sweetwater County

Irene Richardson-Ben Franklin Club

North Big Horn Hospital

Eric Connell-Buffalo Club

Sheridan Memorial Hospital

Mike McCafferty-Ben Franklin Club

South Lincoln Medical Center

David Ryerse-Buffalo Club

Weston County Health Services

Maureen Cadwell-Chairman's Circle

Wyoming Behavioral Institute

Mikel Phillips-Chairman's Circle

Wyoming Hospital Association

Eric Boley - Chairman's Circle
Barry Burkart- Chairman's Circle

AHAPAC Donor Clubs

2023



AHAPAC is appreciative of all contributions. Five club levels have been established to recognize members for their generous support.



1898 Society (\$5,000 per year)

Established in 2018, the "1898 Society" recognizes the founding of the American Hospital Association in Cleveland, OH. Contributors at the \$5,000 level will be invited to special events, receive priority seating at AHAPAC events, get invitations to participate in quarterly calls with political experts, have access to insider political information related to elections, and be recognized at AHA national meetings.



Champions Club (\$2,500 per year)

Contributors at the \$2,500 level will receive priority seating at AHAPAC events, invitations to participate in quarterly calls with political experts, access to insider political information related to elections, and recognition at AHA national meetings.



Ben Franklin Club (\$1,000 per year)

The \$1,000 level is named for the co-founder of the Pennsylvania Hospital, the nation's first hospital in 1751. Contributors at the \$1,000 level will receive invitations to participate in bi-annual calls with political experts, access to insider information, and recognition at AHA national meetings.



Chairman's Circle (\$500 per year)

Established in 1997, the Chairman's Circle has grown each year and is now an essential support base of the AHAPAC. Members receive access to insider information and recognition at AHA national meetings.



Capitol Club (\$350 per year)

Since 1978, the Capitol Club has been the backbone of AHAPAC. Members will receive recognition at AHA national meetings.

Contributions or gifts to the AHAPAC are not deductible as charitable contributions for federal income tax purposes. All contributions are voluntary and have no impact on your job status, performance review, compensation or employment. Any giving guideline is merely a suggestion. Any amount given or the decision not to give will not advantage or disadvantage you. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year (January-December).

GENERAL HOSPITAL CAMPAIGN RULES



- Contributions must be voluntary without the use of force, threats, or fees.
- Special Notices must be included. Solicitees must be informed of:
 - WHA PAC's purpose
 - Their right to refuse solicitation without reprisal
 - Suggested amount is only a suggestion
 - More or less (or nothing at all) can be given
 - Amount given or not given will not benefit or disadvantage the solicitee
 - Contributions are political donations and may not be deducted as charitable contributions on federal taxes
 - Federal law requires contributions shared with AHAPAC over \$200 to be reported to the FEC
- The soliciting hospital must sign and return the FEC Prior Authorization Requirement (AHAPAC Prior Authorization Form) to WHA PAC prior to solicitations.
- Hospital solicitations are limited to a restricted class. The restricted class is:
 - The corporation's full time executive and administrative personnel (employees paid on a salary basis and who have policymaking, managerial, professional, or supervisory responsibilities)
 - Stockholders
 - Families of the above two groups
- Solicitation of the general public is prohibited.
- The hospital may only participate in only one federal PAC solicitation per calendar year.
- Individuals may contribute a maximum of \$5,000 per calendar year to individual PACs.
- Not-for-profit hospitals cannot make corporate contributions to WHA PAC; individual for-profit hospitals can contribute to WHA PAC, but these funds cannot be shared with the American Hospital Association
- WHA PAC may not accept more than \$100 in cash from any one known individual (or \$50 cash from an anonymous donor).
- With the Special Notices given above, solicitations may be made only to the restricted class and may be made:
 - Orally, but, especially for non-for-profit hospitals, it is not advised to do this during hospital-sponsored meetings – off hours by personal email would be better due to 501(c)(3) status
 - By mail to the home addresses of the restricted class
 - By publications
- If someone outside of the restricted class is solicited or makes a contribution:
 - The material must say that contributions will be screened and contributions outside of the restricted class will be returned
 - The exposed non-restricted class must be incidental or de minimis as compared to the entire circulation

SOLICITATION GUIDELINES FOR 501(C)(3) HOSPITALS



Questions and Answers about Trade Association PAC Activity

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

posrhon. [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.

Why We Need Your Support

Decisions made in the halls of Congress impact patients, families and hospitals – for good and bad.

Working together, hospital and health system leaders and employees can help elect lawmakers who will guide policy conversations that affect the health of Americans across the country.

AHAPAC is the cornerstone of hospital advocacy that amplifies the voice of our community.

Make your contribution today!

Scan the QR code and you will be taken directly to the on-line secure page to process your payment.

Thank You!

