

2014 CWA Political Action Fund Administrative Procedures – Checklist

1. Dates of Program

The 2014 CWA Political Action Fund (federal political action committee- CWA-COPE PCC) Program will be conducted on a calendar year basis beginning January 1, 2014, through December 31, 2014.

2. Payroll Deductions for Member Contributions:

A member must complete the CWA Voluntary Check-off Authorization Card in order to contribute to the CWA Political Action Fund by payroll deduction. The card must then be submitted to the member's employer with a copy to the District/Sector office.

Federal election law also regulates how PAC payroll deductions are solicited, received and recorded, and it is important to make sure that CWA, its affiliates and our members comply with that law. In order to achieve better compliance, Local Unions and District/Sectors should take the following measures.

First, maintain copies of all payroll deduction cards with member signature. Because a signed form can authorize deductions that continue for years, forms are sometimes misplaced or not carried over when, for example, there is a corporate change or relocation. Locals should retain every form for members whose PAC payroll deduction is still active.

Second, retention of these forms must continue for at least three years after the employee's deductions stop. It is fine to maintain the forms indefinitely if that is easier.

Third, Locals must maintain a copy of every newly signed PAC payroll deduction authorization form, even after the form itself is submitted to the employer for processing. Union maintenance of copies of the forms is necessary to verify the accuracy of employer administration of the PAC payroll deduction plan, including the list of deductions that the employer transmits either to the Local or directly to CWA-COPE PCC.

Finally, Locals must make PAC payroll deduction forms available to CWA or CWA-COPE PCC if requested to do so. We will request them only if we are legally required to or if we need to verify something in connection with the forms.

IMPORTANT NOTE—Each District/Sector has enacted a District/Sector-wide policy to implement these procedures. Please check with you District/Sector office for a copy of the District/Sector PDA policy.

3. Record Keeping For Cash/Check Contributions

Locals collecting voluntary contributions from CWA members to the CWA Political Action Fund are required by law to keep the following records:

- A. Contributions to the CWA Political Action Fund (CWA-COPE PCC) in amounts of \$50.00 or less per member collected at a fundraising event:
 - A Local must keep a record of the date of the collection, the name of the event at which the collection took place, and the total amount collected; or,
 - The name and address, date, and amount of contribution for each contributing member. Also, checks should show the contributor's name and address.
Never accept a cash contribution from any individual in an amount over \$100.
- B. Contributions to the CWA Political Action Fund (CWA-COPE PCC) by cash or check in amounts over \$50.00 per member:
 - A local must keep a record of the contributor's name and address and the date received and amount of each contribution, whether made in cash or by check.
 - A copy of this information should be sent to the CWA Political Action Fund via the District/Sector office along with the contributions collected. Checks should be made payable to "CWA-COPE PCC".
- C. Contributions to the CWA Political Action Fund by cash or check aggregating over \$200 during a calendar year from a member:
 - A local must keep a record of the contributor's occupation and name of employer, in addition to the contributor's name and address, date received and amount of each contribution.

4. Transmittal of Contributions

CWA discourages locals from accepting cash or engaging in fundraising activities involving cash. The preferred methods of the CWA Political Action fundraising are signing up members on payroll check-off (where available) or contributions by check, money order, and/or credit card.

A. Method of Transmittal

Cash contributions should be forwarded to the CWA Political Action Fund (via the District/Sector office) in one of the following ways:

- A Local may deposit cash contributions into the Local's CWA Political Action Fund transmittal account, a bank account used only to deposit and transfer contributions to the CWA Political Action Fund. This

account must be separate from the Local's general fund account(s) and may not contain any funds other than voluntary contributions to be sent to the CWA Political Action Fund. [While the Federal Election Commission permits Locals to transmit contribution money from their general fund checking account, if proper and detailed records are kept, the CWA Political Action Fund believes that it is safer and easier to establish a separate transmittal account for forwarding these contributions.]

- Cash contributions may be forwarded to the CWA Political Action Fund (via the District/Sector office) by obtaining a money order or cashiers check in the total amount of those contributions made payable to "CWA-COPE PCC" and sending it to the CWA Political Action Fund along with the necessary contributor information described above.
- Checks in any amount made payable to CWA-COPE PCC that represent voluntary contributions from CWA members must be transmitted to the CWA Political Action Fund (via the District/Sector Office) directly along with the necessary contributor information described above.
- Contributions made via payroll deduction must either be transmitted directly to the CWA Political Action Fund by the employer making the deduction or, if received by the Local, must be transmitted via a check drawn on the Local's separate transmittal account, made payable to "CWA-COPE PCC" along with the records of the date and amount of each member's contribution, the name and address of the member, and the member's occupation and employer.

Never deposit CWA Political Action Fund contributions in an individual's bank account in order to transmit them to the CWA Political Action Fund.

B. Timing of transmittal:

- All individual contributions of \$50 or less must be transmitted to the CWA Political Action Fund within 30 days from the date of receipt.
- All individual contributions over \$50 must be transmitted to the CWA Political Action Fund within 10 days of receipt. To meet this legal requirement, locals must transmit any contributions collected by the Local to their District/Sector office within one week of the date of collection.

5. Allocation and Crediting of CWA Political Action Fund dollars

- When a local reaches 10% of its membership at a minimum of \$1 weekly or higher, the money will be allocated as follows:
 - 40%- National
 - 40%-District
 - 20%-Local

- When a local reaches 15% of its membership at a minimum of \$1 weekly or higher, the money will be allocated as follows:

37.5%–National
37.5%–District
25%–Local

- When a local reaches 20% of its membership at a minimum of \$1 weekly or higher, the money will be allocated as follows:

33-1/3%–National
33-1/3%–District
33-1/3%–Local

- When a local reaches 35% of its membership at a minimum of \$1 weekly or higher, the money will be allocated as follows:

30%–National
30%–District
40%–Local

Credit for the amount contributed to the CWA Political Action Fund will be given to the Local and the District/IUE from which it is received for purposes of the CWA Political Action Fund Awards Program.

Because of stringent Federal Election Commission requirements, all contributions to the CWA Political Action Fund (CWA-COPE PCC) shall continue to be maintained in one bank account in Washington, D.C. The portions allocated to the District/IUE and Locals will be available for expenditure upon request by the Districts/Sectors and the Locals.

- Locals must make their requests for expenditures from their portion through their respective District/Sector offices.
- CWA Political Action Fund monies shall only be used to support a candidate who is an AFL-CIO or CWA Political Action Fund-endorsed candidate.

6. Credit for CWA Political Action Fund Awards

Convention Stage Awards

The time period for qualifying for CWA Political Action Fund awards will be all funds collected between January 1 and December 31 unless otherwise stated in the CWA Political Action Fund Awards Program.

District Meeting Awards

The time period for qualifying for CWA Political Action Fund awards will be all funds collected between January 1 and December 31 unless otherwise stated in the CWA Political Action Fund Awards Program.

7. **Check Contributions**

All checks which represent voluntary individual contributions from members to the CWA Political Action Fund federal account must be made payable to: "CWA-COPE Political Contributions Committee" or "CWA-COPE PCC."

8. **Disclaimer Language Required on Fundraising**

All written solicitations for the CWA Political Action Fund by a Local must contain the following language:

- A. "Contributions to CWA-COPE PCC are voluntary. CWA members are not required to contribute to the CWA Political Action Fund as a condition of membership in the union or as a condition of employment and may refuse to do so without fear of reprisal. The CWA Political Action Fund will use the contributions it receives for political purposes including contributions to and expenditures on behalf of federal and state/local candidates."
- B. "Paid for and authorized by CWA on behalf of a joint fundraising effort for CWA-COPE PCC and AFL-CIO COPE PCC."
- C. "Contributions or gifts to CWA-COPE PCC are not deductible as charitable contributions for federal income tax purposes."
- D. "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".

Requirements for all Membership Club and Quorum Awards

Contributions may be in the form of personal checks, money orders or payroll deductions (check-off) payable to CWA-COPE PCC. CWA members who are eligible for membership will be given an incentive item from the appropriate club/quorum level, when they sign up for membership. Credit for Annual Awards will be given for full amount contributed by a COPE member for the previous calendar year. This credit will be given to the Local designated by the member to receive credit and to the District/IUE in which the Local is located. No more than one (1) Local can be designated to receive credit for the member's contribution.

- **COPE Membership Club**

All CWA members who voluntarily contribute \$1.00 a week or more each month during a complete calendar year (January - December) will be eligible for membership in the CWA Political Action Fund COPE Club.

- **Platinum Quorum**

All CWA members who voluntarily contribute \$5.00 a week or more each month during a complete calendar year (January - December) will be eligible for membership in the CWA Political Action Fund Platinum Quorum.

- **Triple Quorum**

All CWA members who voluntarily contribute \$7.00 a week or more each month during a complete calendar year (January - December) will be eligible for membership in the CWA Political Action Fund Triple Quorum.

- **President's Club**

All CWA members who voluntarily contribute \$10.00 a week or more each month during a complete calendar year (January - December) will be eligible for membership in the CWA Political Action Fund President's Quorum.

9. Unless specifically approved by the CWA Executive Board, CWA Political Action Fund (CWA-COPE PCC), 501 Third Street, NW, Washington, D.C. 20001-2797 shall be the only authorized political action committee affiliated with the Communications Workers of America.
10. In no event shall a political action or political education committee other than CWA-COPE PCC make expenditures in connection with a Federal election. Non-federal political action committees sponsored by CWA Locals and CWA Districts/Sectors should coordinate with the CWA Political Action Fund when making contributions to state and local candidates. This will ensure that contributions made by the national CWA Political Action Fund and by such non-federal PACs do not exceed applicable state/local contribution limits.