



The Structure of NAIFA's PACs and State Chapter PAC Filings

NAIFA's PAC program is a strong and critical part of NAIFA advocacy, but it's also complicated. This summary outlines the structure of NAIFA's family of PACs to help avoid confusion when NAIFA State Chapters file state campaign finance reports and when NAIFA leaders address PAC issues.

I. The PAC Program for NAIFA and NAIFA State Chapters

NAIFA's PACs are a family of PACs operated by NAIFA and NAIFA State Chapters. The term "IFAPAC" is no longer used to describe NAIFA's PAC program because it can create a mistaken belief that IFAPAC is a political action committee (PAC). Instead of "IFAPAC," NAIFA now uses the terms "NAIFA's PACs," "NAIFA's network of PACs" and "NAIFA's family of PACs" to refer collectively to the group of PACs sponsored by NAIFA and by State Chapters. State Chapter PACs will continue to be referred to as State Chapter IFAPACs.

The NAIFA family of PACs includes one federal PAC (called NAIFAPAC) and 51 state chapter PACs – one for each NAIFA State Chapter and the NAIFA D.C. chapter.

The federal PAC – NAIFAPAC – contributes only to campaigns for federal legislative branch candidates and to federal political committees.

NAIFA State Chapter IFAPACs contribute only to campaigns for state legislative branch candidates and to state political committees. (Contributions to state insurance commissioner candidates is permitted in states where that position is elected.)

Together, NAIFA's family of PACs (formerly known as IFAPAC) is not a combined state or federal PAC or any other type of single entity that contributes to campaigns, candidates, or committees at the federal or state level. Likewise, IFAPAC was not a PAC and did not make contributions to any campaigns, candidates, or committees, or to NAIFAPAC or to any NAIFA State Chapter IFAPACs. (And, since it is not and was never an entity, there is no federal EIN for IFAPAC.)

Rather than referring to "IFAPAC," we will now refer to "NAIFA's family of PACs," "NAIFA's network of PACs" and "NAIFA's PACs" when referring to the joint fundraising activities for NAIFAPAC and the NAIFA State Chapter IFAPACs, and to the system used to collect and transfer contributions made to NAIFAPAC and the NAIFA State Chapter IFAPACs. NAIFA's PACs are coordinated by NAIFA under the direction of the NAIFA PAC Subcommittee and the leadership of the NAIFA Board.

II. What it Means to "Support NAIFA's PACs"

The NAIFA family of PACs is a means to jointly collect contributions from individual NAIFA



members at one time, along with any contributions from state and local chapters, so that those contributions can be directed to the NAIFA federal PAC's political and administrative accounts, and to the NAIFA State Chapter IFAPAC political and administrative accounts that are appropriate for each individual contributor.

When we refer to “supporting NAIFA’s PACs” we are referring to contributions to the federal and state PACs, within the NAIFA family of PACs, sponsored by NAIFA and by NAIFA State Chapters. In other words, when NAIFA members “support NAIFA’s PACs” they are contributing to NAIFAPAC and to their respective NAIFA State Chapter IFAPACs (or in some cases, members contribute only to the federal PAC). Members do not contribute to an IFAPAC fund.

Members who “support NAIFA’s PACs” may also contribute to administrative funds of NAIFAPAC and NAIFA State Chapter IFAPACs, which helps defray the cost of operating the federal and state PACs, in addition to (or instead of) contributing to those PACs’ political funds.

III. Reporting Contributions to State Chapter IFAPACs in State Chapter Campaign Finance Filings

Campaign finance disclosure reports filed by NAIFA State Chapters should list the individual member contributors to the NAIFA State Chapter IFAPAC, and any contribution by a state or local chapter, and each of their respective contributions.

When NAIFA State Chapters file campaign finance disclosure reports with their applicable state governments, they must never list the following as contributors: NAIFA, NAIFAPAC, IFAPAC, or State Share – because those are not names of contributors to any NAIFA State Chapter IFAPAC.

Likewise, a NAIFA State Chapter must not list or report the total amount of the monthly state share transferred to a State Chapter IFAPAC because that is an aggregate amount and is not the required information concerning individual contributors and their individual contributions.

IV. Reminders about the Structure of NAIFA’s PAC Program

NAIFA plans to remind NAIFA State Chapter leaders about the structure of the NAIFA PAC program, as outlined in this memo, using communication opportunities such as the following:

- Summary of this topic emailed periodically to State Chapter Leaders
- Reminder of this topic included with monthly state share transfer confirmation emails
- Summary provided at State Chapter Cohort meetings
- Summary presented at the National Leadership Conference
- Summary included in State Chapter Leader training materials (on the NAIFA website)

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