



## Background on IFAPAC and State Chapter PAC Filings

The structure of IFAPAC – NAIFA’s PAC program – can be complicated. This summary aims to outline the structure of IFAPAC to help avoid confusion when NAIFA State Chapters file state campaign finance reports and address other PAC issues.

### I. The IFAPAC Program for NAIFA and NAIFA State Chapters

IFAPAC is the family of PACs operated by NAIFA and NAIFA State Chapters. However, IFAPAC is not a political action committee (PAC). Rather, IFAPAC is how we refer collectively to the group of PACs separately sponsored by NAIFA National and NAIFA State Chapters.

Within the IFAPAC network, there is one federal PAC, which is sponsored by the NAIFA national association – called NAIFAPAC – and 51 state chapter PACs – one sponsored by each NAIFA State Chapter and the NAIFA D.C. chapter.

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

NAIFA State Chapter PACs contribute only to campaigns for state office candidates and to state political committees.

IFAPAC is not a state or federal PAC or any other type of entity that contributes to campaigns, candidates, or committees at the federal or state level. Accordingly, IFAPAC does not make contributions to any campaigns, candidates, or committees, or to NAIFAPAC or to any NAIFA State Chapter PACs. (And, since it is not an entity, IFAPAC does not have a federal EIN.)

Instead, IFAPAC is the name given to the joint fundraising activities for NAIFAPAC and the NAIFA State Chapter PACs, and to the system used to collect and transfer contributions made to NAIFAPAC and the NAIFA State Chapter PACs. The IFAPAC program is coordinated by NAIFA under the direction of the IFAPAC Subcommittee and the leadership of the NAIFA Board.

### II. What it Means to “Support IFAPAC”

The IFAPAC network is a means to jointly collect contributions from individual NAIFA members in one place, along with any contributions from state and local chapters, so that those contributions can then be transferred to the NAIFA federal PAC’s political and administrative accounts, and to the NAIFA State Chapter PAC political and administrative accounts that are appropriate for each individual contributor.

When we refer to “supporting IFAPAC” we are referring to contributions to the federal and state PACs within the IFAPAC network of PACs sponsored by NAIFA and by NAIFA State Chapter PACs. In other words, when NAIFA members “support IFAPAC” they are contributing to NAIFAPAC and to their respective NAIFA State Chapter PACs (or in some cases, members



contribute only to the federal PAC). Members do not contribute to an IFAPAC fund.

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

### III. Reporting Contributions to NAIFA State Chapter PACs in State Chapter PAC Filings

Campaign finance disclosure reports filed by NAIFA State Chapters should list the individual member contributors to the NAIFA State Chapter PAC, 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 PAC.

Likewise, NAIFA State Chapters must not list or report the total amount of the monthly state share transferred from IFAPAC to State Chapter PACs because those are aggregate amounts and are not the required information concerning individual contributors and their respective contributions.

### IV. Reminders about the Structure of the IFAPAC Program

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

- Summary of this topic emailed annually 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)