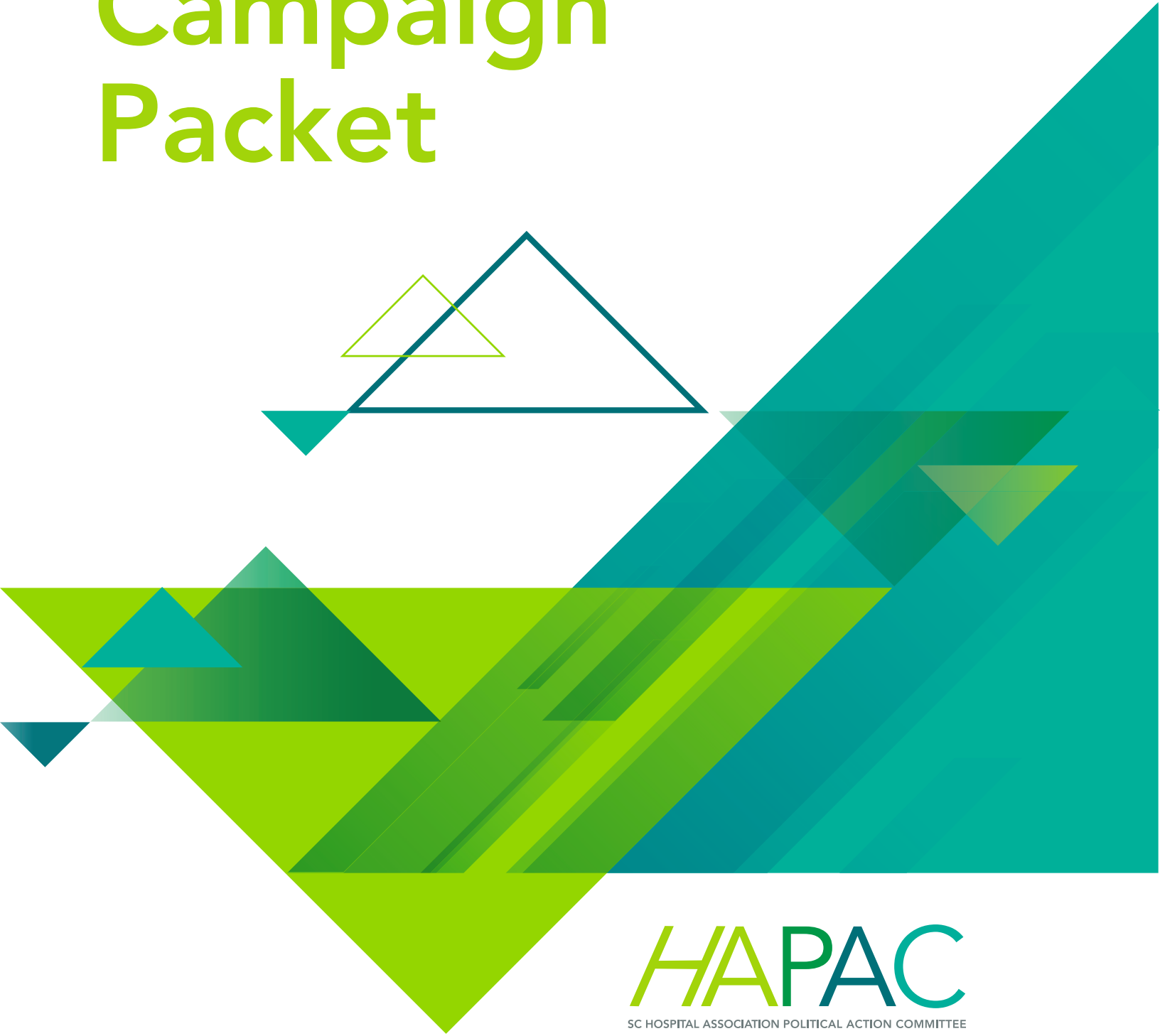


2024

# Campaign Packet

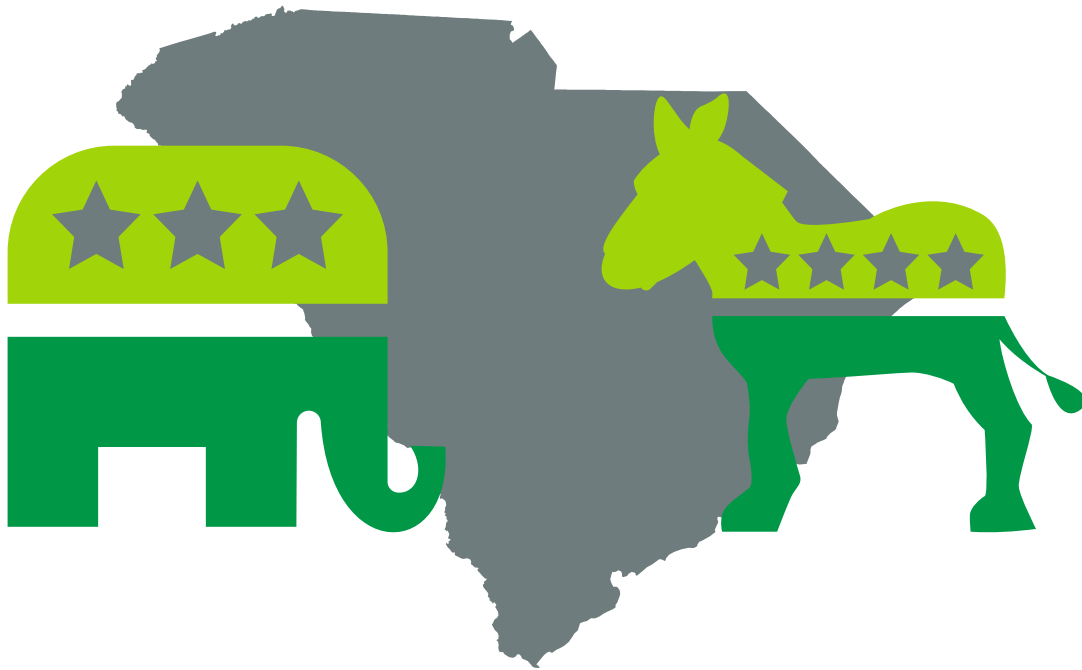


HAPAC

SC HOSPITAL ASSOCIATION POLITICAL ACTION COMMITTEE

# What is **HAPAC** and what does it do?

HAPAC is a non-profit, non-partisan political action committee that provides South Carolina's healthcare workers a connection, both at the state and federal levels, to legislators.



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

In 2023, HAPAC contributed more than \$57,5550.00 in hospital funds.

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

**CONTRIBUTE TO HAPAC TODAY!**

[www.SCHA.org/HAPAC](http://www.SCHA.org/HAPAC)

**HAPAC**

SC HOSPITAL ASSOCIATION POLITICAL ACTION COMMITTEE

# FAQS ABOUT PACS

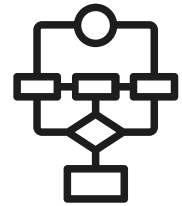
## PAC

### 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?

PACs can receive funds from many different entities, including corporations, nonprofit organizations, private citizens and other PACs. Many PACs are restricted to a private class and can only solicit individuals and organizations within that class. For example, HAPAC can only solicit SCHA member facilities and some employees of SCHA 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 HAPAC Board consists of representation from the SCHA Board and SCHA member hospitals.

# MEMBERSHIP & GOALS

## MEMBERSHIP CLUB LEVELS

HAPAC membership levels are determined by totaling all contributions made to HAPAC during the 2024 contribution cycle.

### Club Levels

1898 Society • \$5,000 and above  
Champion's Club • \$2,500 – \$4,999  
Ben Franklin Club • \$1,000 – \$2,499  
Chairman's Circle • \$500 – \$999

Capital Club • \$350 – \$499  
Palmetto Club • \$100 – \$349  
Crescent Club • \$20 – \$99

### 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 HAPAC, with a minimum baseline goal of \$500.

# 2023 CONTRIBUTIONS

The 2023 HAPAC Campaign received hospital contributions and fundraising support totaling \$57,550.00

Congratulations to the following hospitals for having met or exceeded their 2023 goal!

## **ANMED HEALTH**

\$13,790.00 (251%)

William Kenley, FACHE, CEO

## **Newberry County Memorial Hospital**

\$500.00 (100%)

John Snow, CEO

## **Spartanburg Regional Healthcare System**

**\$9,935.00** (111%)

Bruce Holstien, CEO

## **SELF REGIONAL HEALTHCARE**

**\$2,450** (112%)

Matthew Logan, MD, FACEP President and CEO

## **TIDELANDS HEALTH**

\$5,600.00 (214%)

Bruce Bailey/CEO

## **SPECIAL RECOGNITION**

### **ANTUM RISK, LTD**

\$3,500

### **PALMETTO HEALTHCARE**

### **LIABILITY INSURANCE PROGRAM**

\$1,000

# INDIVIDUAL CONTRIBUTIONS

## ANMED HEALTH

Ben Franklin Club • William Kenley  
Chairman's Circle • Kimberly Brewer  
Chairman's Circle • Michael Cunningham  
Chairman's Circle • Lynn Gregory  
Chairman's Circle • Chad Lott  
Chairman's Circle • Bradley Mock  
Chairman's Circle • Christine Pearson  
Chairman's Circle • Charles Thornton  
Capital Club • Marilyn Yeske  
Palmetto Club • Stoney Abercrombie  
Palmetto Club • George Acker  
Palmetto Club • Jonathan Anderson  
Palmetto Club • James Boseman  
Palmetto Club • Kimberly Burden  
Palmetto Club • John Callahan Sr.  
Palmetto Club • Emily DeRoberts  
Palmetto Club • Nancy Duffy  
Palmetto Club • Teresa Dullaghan  
Palmetto Club • Melody Franks  
Palmetto Club • Sonya Gould  
Palmetto Club • Rebekah Hemphill  
Palmetto Club • Tim Hipp  
Palmetto Club • Frank Hughes  
Palmetto Club • Greg Kahaly  
Palmetto Club • William Kibler  
Palmetto Club • Michael Kunkel  
Palmetto Club • Syed Malik  
Palmetto Club • Joe Martin  
Palmetto Club • Amber Miller  
Palmetto Club • Travis Monroe  
Palmetto Club • Todd O'Quinn  
Palmetto Club • Angi Patrick  
Palmetto Club • Christian Przirembel  
Palmetto Club • Terence Roberts  
Palmetto Club • Jana Schofield  
Palmetto Club • Tim Self  
Palmetto Club • Greg Shore  
Palmetto Club • Juana Slade  
Palmetto Club • Dale Smith Duncan  
Palmetto Club • Marty Stewart  
Palmetto Club • Shelly Stone  
Palmetto Club • Suzanne Wilson  
Crescent Club • Robert Austin  
Crescent Club • Patricia Gardner Lytle  
Crescent Club • Tammy Gillespie  
Crescent Club • Sarah Pierce  
Crescent Club • Lori Powell  
Crescent Club • Wendy Smith  
Crescent Club • Penny Tisdale

## BEAUFORT MEMORIAL COUNTY HOSPITAL

Crescent Club • Kevin Lovett

## CONWAY MEDICAL CENTER

Ben Franklin Club • Brian Argo

## LEXINGTON MEDCAL CENTER

Ben Franklin Club • Tod Augsberger  
Chairman's Circle • Michael Greeley  
Chairman's Circle • Jeff Brillhart  
Chairman's Circle • Brent Powers  
Capital Club • Kathryn Gill  
Capital Club • Michael Greeley  
Palmetto Club • Jay Hamm  
Palmetto Club • Wendy Johnston  
Palmetto Club • Ashley Joiner  
Palmetto Club • Lara Moore  
Palmetto Club • Shelley Pifer  
Palmetto Club • Anna Shalkham  
Palmetto Club • Roger Sipe  
Palmetto Club • Melissa Taylor  
Palmetto Club • Dale Thompson  
Palmetto Club • Woody Turner  
Palmetto Club • Jeffrey Wilson  
Palmetto Club • Wendy Johnson  
Palmetto Club • Kate Zannella  
Crescent Club • Robert Beeman  
Crescent Club • Harry Davenport  
Crescent Club • Brandi Dixon  
Crescent Club • Justin Harrigan  
Crescent Club • Paul Wise  
**MCLEOD HEALTH**  
Ben Franklin Club • Matthew Johnson  
Ben Franklin Club • Donna Isgett  
Ben Franklin Club • John McLeod  
Capital Club • Matthew Reich  
Capital Club • Bren Lowe  
Palmetto Club • Virginia Hardee  
Palmetto Club • Scott Montgomery  
Palmetto Club • April Tucker  
Palmetto Club • Monica Vehige  
Palmetto Club • Sonny Barnes  
Palmetto Club • Rachel Gainey

## MUSC

Ben Franklin Club • David Zaas

## NEW BERRY COUNTY MEDICAL CENTER

Ben Franklin Club • Meg Davis  
Ben Franklin Club • John Doyle  
Ben Franklin Club • John Snow

## SELF REGIONAL HEALTHCARE

Ben Franklin Club • Matthew Logan  
Capital Club • David Isenhower  
Capital Club • Tim Evans  
Palmetto Club • Sherri Gordon  
Palmetto Club • William Gordon  
Palmetto Club • Sara Sears  
Palmetto Club • Kenneth Coffey  
Palmetto Club • Brent Parris  
Palmetto Club • Andy Hartung  
Palmetto Club • Kendra Keeney  
Crescent Club • Carol Stefaniak

## SPARTANBURG REGIONAL HEALTHCARE

Ben Franklin Club • Bruce Holstien

## SC HOSPITAL ASSOCIATION

Ben Franklin Club • Thornton Kirby  
Ben Franklin Club • John Schipman Ames  
Ben Franklin Club • Neill Cameron  
Ben Franklin Club • Allan Stalvey  
Chairman's Circle • Rozalynn Goodwinn  
Chairman's Circle • Barney Osborne  
Chairman's Circle • Elizabeth Harmon  
Chairman's Circle • Lara Hewitt  
Palmetto Club • Joy Fleming  
Palmetto Club • Carmen Goulet  
Palmetto Club • Melanie Matney  
Palmetto Club • Nicholas Touchstone  
Palmetto Club • Karen Reynolds  
Crescent Club • Mandi McMillian

## TIDELANDS HEALTH

Champion's Club • Gayle Resetar  
Ben Franklin • Bruce Bailey  
Chairman's Circle • Judy Ingle  
Chairman's Circle • Carl Lindquist  
Capital Club • Amy Stevens  
Palmetto Club • Michael Jordan  
Palmetto Club • Wanda Prevatte  
Palmetto Club • Julian Reynolds  
Palmetto Club • Daniel Scheffing  
Palmetto Club • Elizabeth Ward  
Palmetto Club • Willie Shelley  
Palmetto Club • Collin Jewell  
Palmetto Club • Jeanne Guest  
Crescent Club • Willie Shelley

# 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.**
  - HAPAC'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 HAPAC 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 HAPAC; individual for-profit hospitals can contribute to HAPAC, but these funds cannot be shared with the American Hospital Association**
- **HAPAC 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

PERKINS COIE LLP

POLITICAL LAW GROUP

---

## 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

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.



HAPAC

SC HOSPITAL ASSOCIATION POLITICAL ACTION COMMITTEE