



INTERACTIVE ONLINE TRAINING PROGRAM

July Reporting Webinar for PACs & Party Committees


July 10, 2019
1:00 – 2:30 PM Eastern

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Objectives

- ▣ **Review filing deadlines and application of “best efforts” for timely filing**
- ▣ **Learn about the Reports Analysis Division (RAD) review process and how best to respond to Requests for Additional Information (RAI)**
- ▣ **Discuss common reporting scenarios**

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FILING DEADLINES AND TIPS FOR TIMELY FILING

I. Timely reporting - filing schedule and reporting dates

Filing Requirements

PACs & Parties file FEC Form 3X

- ☐ Quarterly Schedule
- OR
- ☐ Monthly Schedule



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~~Quarterly~~ Filers - 2019

Report Type	Coverage Dates	Due Date
Mid-Year	01/01/19 - 06/30/19	07/31/19
Year-End	07/01/19 - 12/31/19	01/31/20

Semi-annual Reports

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- A. Filing schedule (11 CFR 104.5(c))
 - 1. Non-election year (odd-numbered year)
 - a) **Quarterly filers:** file on a **semiannual basis**; reports due July 31 and January 31.

Monthly Filers - 2019

Reporting Period	Due Date
January 1 - 31	February 20
February 1 - 28	March 20
March 1 - 31	April 20
April 1 - 30	May 20
May 1 - 31	June 20
June 1 - 30	July 20
July 1 - 31	August 20
August 1 - 31	September 20
September 1 - 30	October 20
October 1 - 31	November 20
November 1 - 30	December 20
December 1 - 31 (Year-End)	January 31, 2020



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- b) **Monthly filers:** file reports on the 20th of each month, except for Year-End due on January 31.

Looking Ahead to 2020 - Quarterly

Report Type	Coverage and Due Dates
April Quarterly	Covers 1/1 - 3/31/20; Due 4/15/20
July Quarterly	Covers 4/1 - 6/30/20; Due 7/15/20
October Quarterly	Covers 7/1 - 9/30/20; Due 10/15/20
Pre-Election	Covers 1st day of current period to 20 days before election; Due 12 days before election (12G covers 10/1 - 10/14/20; Due 10/22/20)
Post-General	Covers from 1 st day of period to 11/23/20; Due 12/3/20
Year-End	Covers 11/24 - 12/31/20; Due 1/31/21



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2. **Election year (even-numbered year)**
- a) **Quarterly filers:** reports due April 15, July 15 and October 15 and January 31; Pre-Primary, Pre-General, Post-General.

Looking Ahead to 2020 - Monthly

Reporting Period	Due Date
January 1 - 31	February 20
February 1 - 29	March 20
March 1 - 31	April 20
April 1 - 30	May 20
May 1 - 31	June 20
June 1 - 30	July 20
July 1 - 31	August 20
August 1 - 31	September 20
September 1 - 30	October 20
October 1 - 14 (Pre-General)	October 22
October 15 - November 23 (Post-General)	December 3
November 24 - December 31 (Year-End)	January 31, 2021

- b) **Monthly filers:** reports due on 20th of each month, except Pre-General and Post-General in lieu of November and December monthly reports. Monthly filers must file a Year-End Report on January 31 of each year.
3. Reporting period always begins the day after close of books of last report filed.
4. Monthly is mandatory for national party committees or party committees with reportable FEA. 11 CFR 300.36(c). If a party committee that files quarterly engages in reportable FEA, it must switch to monthly.

See *Reports Due in 2019* FEC Record article online:
<https://www.fec.gov/updates/reports-due-2019/>

Choosing a Filing Schedule

Committees active in a number of different states may benefit from filing monthly



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Changing Filing Frequency

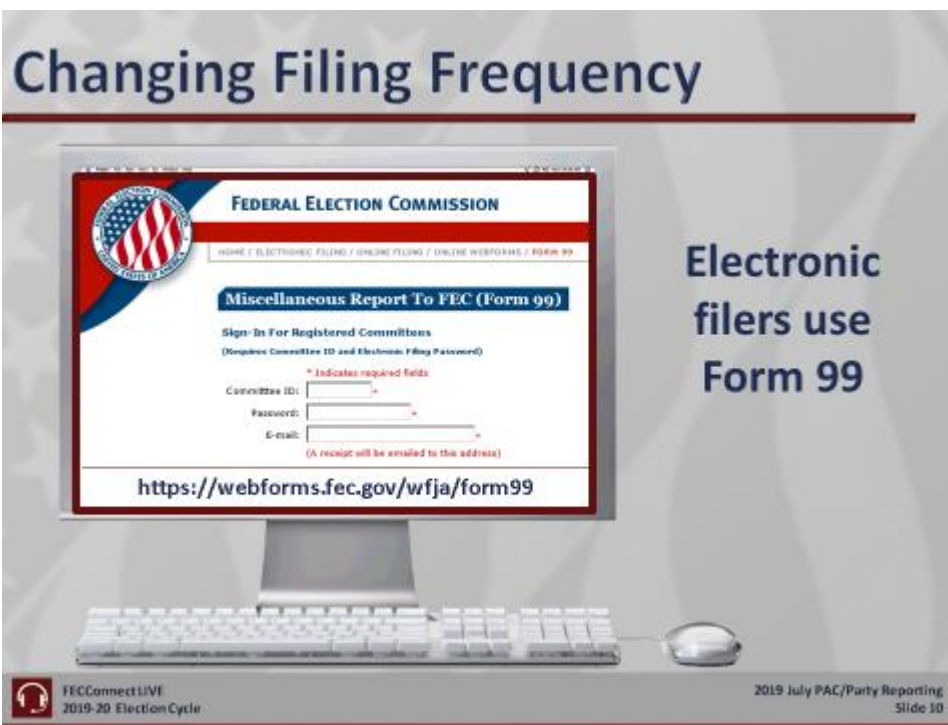
Request on or before next report

- ▣ Electronic filers must submit request electronically
- ▣ No more than once per year



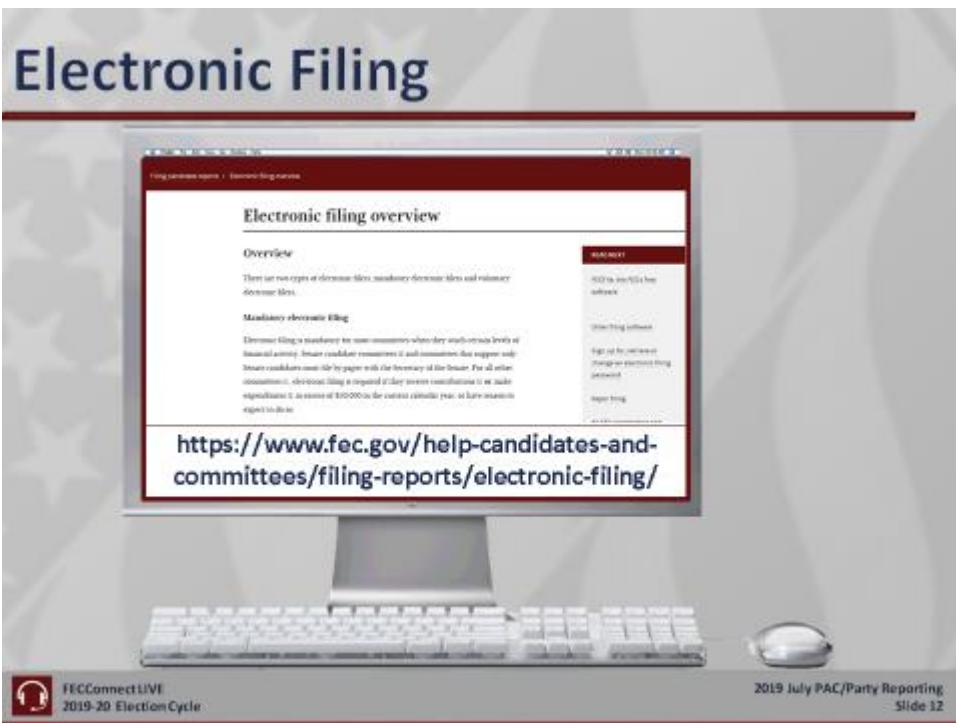
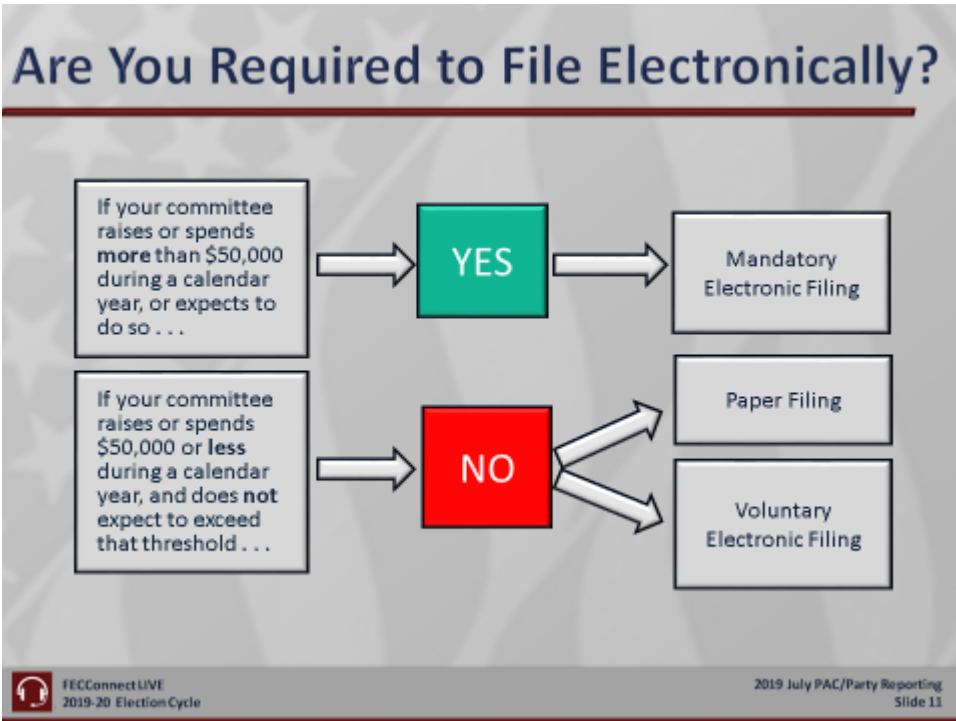
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B. Changing filing schedule

1. PACs and party committees may change their filing schedule from quarterly to monthly or from monthly to quarterly only after notifying the Commission in writing (or electronically, if an e-filer) of their intention. The committee can provide this notification along with a required report filed under the committee's current filing schedule or in a separate Miscellaneous Text Submission (Form 99).
2. The committee should wait to receive a letter from the FEC acknowledging its filing frequency change. The committee will then be required to file the next required report under the new filing schedule. However, party committees that engage in reportable federal election activity (FEA) must automatically switch to monthly filing.
3. May only change filing schedule once per calendar year.



<https://www.fec.gov/help-candidates-and-committees/filing-reports/electronic-filing/>

C. Electronic filing v. paper filing (11 CFR 104.18)

1. **Mandatory for:** PACs, campaigns and party committees that raise or spend more than \$50,000 in calendar year or have reason to expect to do so.
2. **Voluntary for:** All other filers
3. **Exceeding threshold for e-filing**
 - a) Once committee exceeds threshold, it begins filing electronically with the next regular report.
 - b) Committee must continue to file electronically for the next two calendar years (January through December), unless it is a campaign committee that has \$50,000 or less in net debts outstanding on January 1 following the general election, and that anticipates terminating prior to January 1 of the next election year.
4. **Voluntary filing**
 - a) Campaign committees that aren't required to e-file, but choose to anyway, must continue to do so for the remainder of the calendar year.
 - b) New committees with no prior data on which to base calculations have reason to expect to exceed threshold if they either:
 - (1) Receive contributions or make expenditures that exceed \$12,500 in first quarter of calendar year, or
 - (2) Receive contributions or make expenditures that exceed \$25,000 in first half of the calendar year.
 - (3) Threshold calculated on a per-committee basis; affiliated committees calculate their own contributions and expenditures separately for purposes of determining if they have met mandatory e-filing threshold.
5. **Paper filing by e-filer**

Campaign committees that submit a report on paper that should have been filing electronically will be treated as non-filers and may be subject to enforcement actions (including Administrative Fines).
6. **To meet the filing deadline, electronically filed reports must be received and validated by the Commission's computer system on or before 11:59 p.m. (Eastern Time) on the filing date.**

D. Electronic filing

1. **Passwords required** - Before you can electronically file, you will have to obtain a password. You cannot file without one.
2. **Who can get a password?**

Only the official treasurer can obtain an e-filing password. It is important that the committee has provided a valid email address on its Statement of Organization, as a validation email will be sent out the committee.

4. **How long does it take?**
 - a) Passwords can now be obtained in just a few minutes online.
 - b) We recommend you request your password as early in the process as possible, in case any issues arise.
5. **The password is case-sensitive.**
6. **Remember your password.** If you forget it, you will have to request a new one.
7. **For more information,** visit <https://www.fec.gov/help-candidates-and-committees/filing-reports/electronic-filing/>

Filing on Time

- ▣ **No Extensions**
 - Filing dates not extended for weekends or holidays.
 - Must be received on business day preceding filing date.
- ▣ **Registered/Certified vs. Overnight Mail**
 - If using USPS registered/certified mail, keep receipt.
 - “Overnight Mail” means next-day express or priority mail with delivery confirmation or overnight service with online tracking system. Same terms as registered/certified mail. (Keep receipt/tracking number)

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- E. Filing on time**
1. **Statute prohibits extensions** (Applicable to paper and electronic filers).
 2. **Weekends and holidays**
Filing dates not extended for weekends or holidays. Must be filed on business day preceding filing date.
 3. **Registered vs. overnight mail**
 - a) If filing using USPS registered mail, keep receipt.
 - b) “Overnight Mail” means next-day express or priority mail with a delivery confirmation or an overnight service with an online tracking system. File using same terms as certified/registered mail. (Keep receipt/tracking number.)

Administrative Fine Program

- ▣ **Civil money penalties for filing late, or not filing at all**
- ▣ **Size of fine depends on various factors**

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F. Administrative Fine Program (AFP)

1. Background

Program for assessing civil money penalties for violations for failure to file reports on time and/or at all.

2. Applies to:

- a) Late filers
- b) Non-filers
- c) Regulations found at 11 CFR 111.30-111.45

3. Civil money penalties -- factors in determining:

The interaction of several factors will determine the size of the penalty (also see calculator on website at <https://www.fec.gov/legal-resources/enforcement/administrative-fines/calculating-administrative-fines/>)

Administrative Fine Program

- ▣ **Election-Sensitive Reports**
 - **Late Filer:** Filed after due date, but prior to four days before the applicable election
 - **Non-Filer:** Filed later than that or not at all
- ▣ **Non-Sensitive Reports**
 - **Late Filer:** Filed \leq 30 days after the due date
 - **Non-Filer:** Filed $>$ 30 days late or not at all



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- a) **Election sensitivity**
 - (1) Election sensitive reports include:
 - October Quarterly of election year,
 - October Monthly of election year, and
 - Pre-election reports for primary, general and special elections.
 - (2) All other reports are considered nonsensitive.
- b) **Whether committee is a late filer or a non-filer**
 - (1) For sensitive reports
 - Late filer – when report is filed after the due date but more than four (4) days prior to the election.
 - Non-filer – report filed after due date and four (4) days or less before the election, or not at all.
 - (2) For nonsensitive reports
 - Late filer – when report is filed within 30 days after the due date.
 - Non-filer – when report is filed 31 or more days after due date, or not at all.
 - (3) Can still be considered a “nonfiler” even if report is eventually filed.

Administrative Fine Program

- ▣ **Prior civil money penalties for reporting violations**
- ▣ **Financial activity in report**
- ▣ **Smaller penalties for activity < \$50,000**
- ▣ **Penalty calculator on FEC website at <https://www.fec.gov/legal-resources/enforcement/administrative-fines/calculating-administrative-fines/>**



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<https://www.fec.gov/legal-resources/enforcement/administrative-fines/calculating-administrative-fines/>

Best Efforts to File on Time

Best efforts may be used as a defense for late filing if:

- ▣ **Committee was prevented from filing report on time by reasonably unforeseen circumstances beyond committee's control**
- ▣ **Filed the report no later than 24 hours after the end of those circumstances**



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- G. Timely filing/using best efforts (not the same as “best efforts” for obtaining contributor information)**
- 1. Reports required on time; no extensions.**

2. **If report not filed on time**, committees may use “best efforts” defense if committee took normal precautions and trained staff, but failure to report was due to circumstances beyond committee’s control and the late report was filed within 24 hours after those circumstances ended (pursuant to April 2007 revisions to AFP regulations).

Best Efforts to File on Time

- ▣ **Committee may use best efforts defense if late filing is due to:**
 - **Severe weather or other disaster-related event**
 - **Failure of FEC computers or software that FEC support cannot resolve**
 - **Widespread disruption of information transmissions over internet**

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3. **Best efforts defense**
 - a) Committee may use best efforts defense if failure to report is due to failure of Commission computers or software, despite receiving Commission technical assistance, widespread disruption of information transmissions over the internet, or severe weather or other disaster-related event.

Best Efforts to File on Time


- ▣ **Committee may not use best efforts defense if late filing is due to:**
 - **Negligence;**
 - **Illness, inexperience or unavailability of treasurer or committee staff;**
 - **Committee computer, software or ISP failures;**
 - **Delays caused by committee vendors/contractors;**
 - **Failure to know; or**
 - **Failure to use filing software properly.**

- b) Committee may not use best efforts defense if failure to report is due to unavailability, inexperience or negligence of staff, counsel or organization, failure of committee's computer system, delays caused by vendors, failure to understand or know the law or failure to use filing software properly.

4. **For more information, review:**
http://www.fec.gov/law/cfr/ej_compilation/2007/notice_2007-7.pdf (rules)
and http://www.fec.gov/law/cfr/ej_compilation/2007/notice_2007-13.pdf
(policy statement) and the May and July 2007 *Record* issues.

Best Practices: Filing

- ✓ **Ensure your staff and vendors understand filing rules and deadlines**
- ✓ **Update your software regularly**
- ✓ **Have a current email address on Form 1 to receive courtesy email reminders**

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Best practices:

- Ensure your staff, vendors and counsel understand reporting and filing rules and deadlines.
- Update your software regularly.
 - To keep up with filing deadlines, make sure your committee has a current email address on its Form 1 (for receiving courtesy reminders). (To do this, submit a complete electronic Form 1 with a new email address.)
 - 2019 deadlines on FEC website: <https://www.fec.gov/updates/reports-due-2019/>
 - Visit the *FEC Record* at each January for dates and deadlines for the coming year (https://www.fec.gov/updates/?update_type=fec-record).

RAD REVIEW AND REFERRAL POLICY

I. Reports Analysis Division (RAD)

A. Organization of RAD – four branches

RAD is divided into four branches – Authorized, Party/NonParty, Compliance and Reports Processing.

PAC/Party Branch Analysts

```
graph TD; RAD[Reports Analysis Division] --> AB[Authorized Branch]; RAD --> PN[Party/Non-Party Branch]; RAD --> CB[Compliance Branch]; RAD --> RP[Reports Processing Branch];
```

- **Party / Non-Party Branch – 22 analysts**
 - Review all party and PAC reports
 - 4-5 month training program; mentored for 6-12 months

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PAC/Party Branch Analysts

- Each analyst is assigned 300-500 committees
- PACs are assigned randomly
- Larger PACs assigned to more senior analysts
- National committees assigned to more senior analysts, state party committees assigned by state, local parties assigned randomly

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RAD Review and Referral Policy

- ▣ **Reports Analysis Division (RAD) reviews according to a policy with confidential thresholds that is approved by the Commission**
- ▣ **The Commission reassesses the policy every election cycle with input from RAD and other offices, i.e., Office of General Counsel (OGC)**

Review and Referral Policy

- ▣ **Categories of review include:**
 - **Mathematical discrepancies**
 - **Failure to provide supporting schedules**
 - **Failure to properly itemize contributions from individuals**
 - **Prohibited, excessive & impermissible contributions**
 - **Improper itemization of disbursements**
- ▣ **RFAI threshold**
- ▣ **Thresholds are confidential and policy is approved by the Commission**

A. **RAD review of reports**

1. **RAD review and referral Policy**

- a) Internal policy contains categories of review the analyst checks such as: prohibited, excessive and impermissible contributions, mathematical discrepancies, failure to provide supporting schedules and failure to properly itemize contributions from individuals and disbursements.

- b) Policy has established thresholds for making determinations on whether to send a Request for Additional Information (RFAI).
- c) Thresholds are confidential and policy is approved by the Commission. A redacted version of the RAD review and referral policy can be found on the RAD web page.

Review of Reports

Thresholds are applied on a per report basis

- ▣ **A recurring reporting issue on multiple reports may result in multiple RFAs on the same issue**
- ▣ **Previous RFAI response is not considered**
 - **Exceptions: Responses relating to best efforts procedures and use of the foreign address safe harbor apply for the two year election cycle**
- ▣ **It's possible to see an issue questioned on one report, but not on another**

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- d) Review is conducted on a per report basis, meaning the thresholds are applied to each report reviewed.
 - (1) This means a committee may receive a RFAI which includes the same issue already addressed in response to a RFAI referencing a different report.
 - Exceptions include outlining Best Efforts procedures which would apply to the two-year cycle and responses relating to foreign address inquiries that indicate safe harbor guidelines are followed for all contributions apply for the two-year election cycle.
 - (2) There may be several issues that are aggregated together to meet a single threshold, so it's possible to see an issue questioned on one report that isn't included in an RFAI on for another report.

- e) Policy is reassessed every election cycle and revisions/changes made based on input from RAD and other offices (such as OGC), and Commissioners.

Request for Additional Information

- ▣ **If internal thresholds are met:**
 - **Analyst sends RFAI with response due date in upper right corner**
- ▣ **No extensions**
- ▣ **Responses assessed by analysts, team leaders**
- ▣ **Analysts do not reply to committee responses**

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- B. Request for Additional Information (RFAI)**
 - 1. If internal thresholds are met, an RFAI is sent**, with a Response Due Date in the upper right hand corner of the letter, extensions are not granted. The committee analyst's name and contact telephone number are also provided in the letter.

Tip: You can find out who your analyst is by visiting:
<https://www.fec.gov/help-candidates-and-committees/question-rad/>.

RFAIs via Email

- ▣ RAD is now emailing RFAIs to email address on Form 1 (Statement of Organization)
 - **Opt-Out Option: File a Form 99 to request that RFAIs be mailed via USPS**
- ▣ Committees can now disclose up to two email addresses on Form 1
- ▣ Ensure current contact information (mailing address, email address, and phone number) appear on FEC Form 1

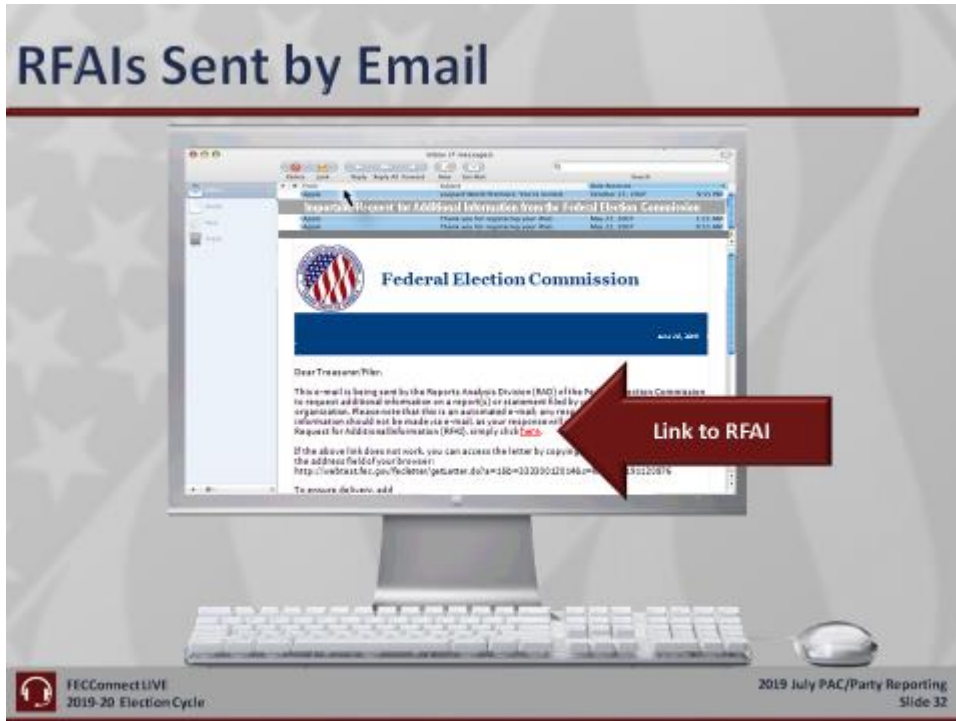


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2. Committees should ensure that they have provided the most current mailing address, email address and phone numbers on their Statement of Organization (FEC Form 1). Often RFAIs are returned by the Post Office due to an incorrect mailing address.
3. RAD's process for sending RFAIs has changed. Most RFAIs are now sent via email to the Committee's official email address, as disclosed on the Statement of Organization (FEC Form 1). Up to two email addresses can now be provided (both will be used for emailing RFAIs). Committees will have the option to continue to receive RFAIs on paper through the mail.

RFAIs Sent by Email



The screenshot shows an email interface with a header from the Federal Election Commission. The email body contains the following text:

Dear Treasurer/Plan:

This e-mail is being sent by the Reports Analysis Division (RAD) of the Federal Election Commission (FEC) to request additional information on a report(s) or statement filed by your organization. Please note that this is an automated e-mail and any response or information should not be made via e-mail, as your response will be processed as a Request for Additional Information (RFAI), simply click [here](#).

If the above link does not work, you can access the letter by copying and pasting the address field of your browser:
<http://webcast.fec.gov/fecweb/getLetter.do?c=110-1120001180&e=1120001180>

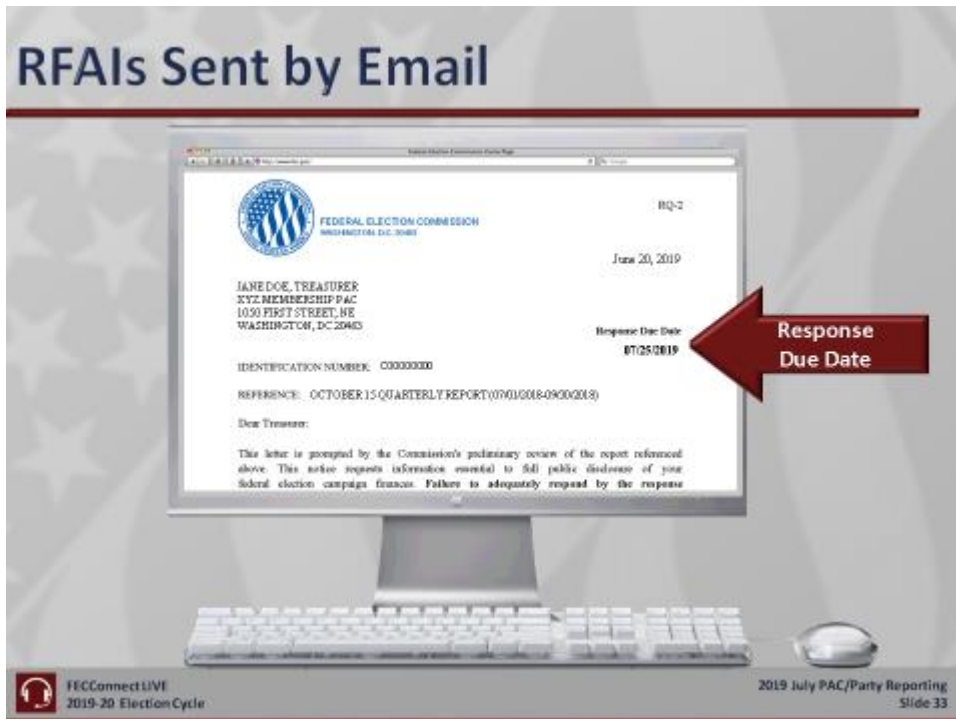
To ensure delivery, add

A red arrow points to the link in the email body with the text "Link to RFAI".

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RFAIs Sent by Email



The screenshot shows an email interface with a header from the Federal Election Commission. The email body contains the following text:

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

IQ-2

June 20, 2019

Response Due Date: 07/25/2019

IDENTIFICATION NUMBER: C00000000

REFERENCE: OCTOBER 15 QUARTERLY REPORT (07010018-09000018)

Dear Treasurer:

This letter is generated by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response

A red arrow points to the "Response Due Date" with the text "Response Due Date".

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RFAIs Sent by Email



Responding to RFAIs

- ▣ Analysts do not contact committees in every case when a response is not sufficient
- ▣ Committee should contact its analyst before and/or after filing a response
- ▣ Analysts do not make legal conclusions
- ▣ Analysts cannot categorize your activity
- ▣ In some cases, RAD consults OGC before sending an RFAI and when assessing a committee's response

4. **Responses are assessed by the analysts and in some cases, team leaders.**
 - a) Analysts do not reply to responses.
 - b) Contact is not made with committees in every case when a response is not sufficient. Further explanation below.

- c) Committees are encouraged to contact their assigned analyst prior to responding if unsure about how to respond or after a response is filed to ensure an adequate response is received.
- d) Keep in mind that analysts can't make legal conclusions or give guidance on a legal conclusion being made by a committee. In addition, they cannot determine what category your activity falls under (i.e., independent expenditures or coordinated party expenditures).
- e) In some cases, RAD consults with OGC before sending a RFAI and when making a response assessment.

Responding to RFAIs


- ▣ **File amendment to:**
 - **Add, Change or Delete actual entries on FEC report**
- ▣ **Use miscellaneous text submission (Form 99) for:**
 - **Narrative responses that do not affect actual entries within a report (e.g., demonstrating best efforts)**

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- 5. **Must amend report when changing information that affects entries on a report.** This would include additions, changes or deletions.
- 6. **Miscellaneous text submission (Form 99)**
Used for narrative responses that do not affect actual entries within a report. (For example, when outlining procedures for “best efforts” in obtaining contributor information.)

Audit Consideration Factors

- ▣ **Level of financial activity**
- ▣ **Responses to RFAs**
 - **Late or no response**
 - **Inadequate response**
- ▣ **Number of amendments filed is NOT a factor**
- ▣ **Number of RFAs received is NOT a factor if responses were adequate and timely**

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- C. Referrals to the Audit Division**
- 1. Factors for making referrals to the Audit Division**
 - a) Level of financial activity;
 - b) Responses to RFAs:
 - (1) Late or no response,
 - (2) Inadequate response.
 - 2. The number of amendments filed is not a factor.**
 - 3. The number of RFAs is not a factor** if responded to adequately and on time.

OGC & ADRO Referrals

- ▣ **Policy includes referral thresholds**
- ▣ **RAD calls committee before referring to OGC or ADRO to explain RFAI and request response**
- ▣ **Adequate and timely response may prevent referral**



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- D. Referrals to OGC (Office of General Counsel) and ADRO (Alternative Dispute Resolution Office)**
1. Internal policy includes thresholds for determining whether a matter should be referred to OGC or ADRO.
 2. Committee will receive a phone call from RAD prior to a referral to ADRO or OGC to explain RFAI and request a response.
 3. An adequate response is required by the timeframe given to prevent the matter from being referred.


REPORTING SCENARIOS

I. FEC Form 3X – Report of Receipts and Disbursements

FEC Form 3X

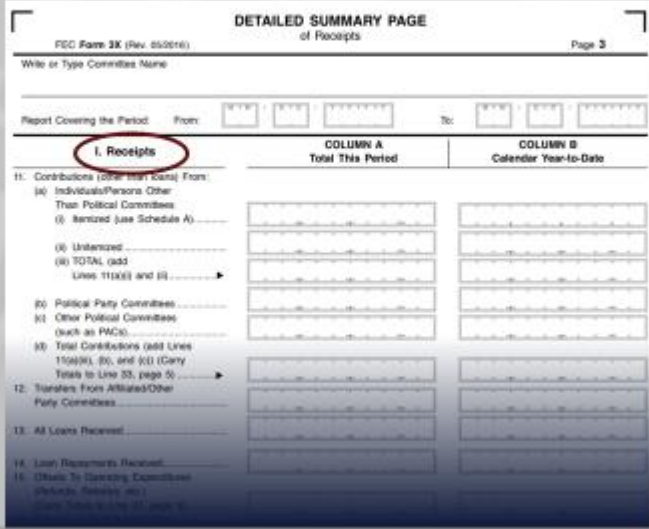
Used by PACs and Party Committee filers

- ▣ Cover Page – shows report type/coverage dates
- ▣ Summary Page – overview of receipts and disbursements
- ▣ Detailed Summary Pages – overview of receipts and disbursements by category
- ▣ Schedules – show detailed info by line number

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Detailed Summary Page: Receipts




FEC Form 3X (Rev. 05/2016) Page 3

Write or Type Committee Name

Report Covering the Period From: [MM/YY] [MM/YY] To: [MM/YY] [MM/YY]

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. Receipts		
11. Contributions (Other than Loans) From:		
(a) Individuals/Persons Other Than Political Committees (i) Itemized (see Schedule A)		
(ii) Unitemized		
(iii) TOTAL (add Lines 11(a)(i) and (ii))		
12. Transfers From Affiliated/Other Party Committees		
13. All Loans Received		
14. Loan Repayments Received		
15. Offsets To Operating Expenses (Refunds, Returns, etc.) (Enter "0" on line 15, page 3)		

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Reporting Receipts

How to Itemize Receipts

Always Itemize:

- ✓ Contributions from party committees and organizations
- ✓ Contributions from other political committees
- ✓ Transfers
- ✓ Loans

Itemize all other receipts when:

- ✓ Aggregate > \$200 from one source in a calendar year

Detailed Summary Page: Disbursements

DETAILED SUMMARY PAGE of Disbursements		
Page 4		
FEC Form 2X (Rev. 02/2018)		
II. Disbursements		
	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures		
(a) Associated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share		
(ii) Non-Federal Share		
(b) Other Federal Operating Expenditures		
(c) Total Operating Expenditures (add (21)(i)(i), (21)(i)(ii), and (21)(b))		
22. Transfers to Affiliated/Other Party Committees		
23. Contributions to Federal Candidates/Committees and Other Political Committees		
24. Independent Expenditures (see Schedule E)		
25. Coordinated Party Expenditures (see U.S.C. § 30718(d) (see Schedule F))		
26. Loan Repayments Made		
27. Loans Made		
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))		

Reporting Disbursements

How to itemize disbursements

Always itemize:

- ✓ Transfers to affiliated committees
- ✓ Loan repayments
- ✓ Loans made
- ✓ Contributions to other federal candidates & PACs

Itemize all other disbursements when:

- ✓ Aggregate > \$200 to the same payee in a calendar year

The image shows a portion of the FEC Form 990, specifically the section for reporting disbursements. It includes fields for the recipient's name, address, date of disbursement, and the amount. The form is divided into multiple rows for reporting multiple disbursements.

Purpose of Disbursement

Entry must be sufficiently specific, when considered with the identity of the recipient, to provide a clear reason for the payment.

The image shows a detailed view of the 'Purpose of Disbursement' entry on the FEC Form 990. The entry is for 'We Help U Consulting' at '123 Moneyed Lane, City, ST 00000'. The date of disbursement is 05/17/2019. The amount of each disbursement for this period is \$2,500.00. The purpose is listed as 'PAC Fundraising Consulting'.

- A. **Purpose of disbursement**
1. FEC regulations require that the “purpose of disbursement” entry for each disbursement be sufficiently specific, when considered with the identity of the recipient, to provide a clear reason for the payment.

2. FEC guidance includes non-exhaustive lists of acceptable and unacceptable “purpose of disbursement” descriptions intended to foster consistency among filers.

Purpose of Disbursement

- ▣ **Rule of thumb: Could reader discern why a payment was made simply by reading the description provided?**
- ▣ **Non-exhaustive lists available on FEC.gov at:
*<https://www.fec.gov/help-candidates-and-committees/purposes-disbursement/>***

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3. As a rule of thumb, the statement suggests that filers consider whether a person unaffiliated with the campaign/committee could discern why a payment was made by reading the description they have provided.
4. Lists are updated periodically and made available online <https://www.fec.gov/help-candidates-and-committees/purposes-disbursement/>

Common Schedule Errors

Make sure all of the schedules needed are included with the filing.

23. Contributions to Federal Candidates/Committees and Other Political Committees..... **\$2,800.00** Disbursement on Detailed Summary Page

Supporting Schedule B

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FEC LINE NUMBER: (check only one)
 21a 22 23 24 25

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
XYZ PAC

Full Name (Last, First, Middle Initial)
A. Jane Doe for Congress

Date of Disbursement
04 18 2019

Address
P.O. Box 1234

City
Big City State: **ST** Zip Code: **00000**

Purpose of Disbursement
Contribution

Candidate Name
Jane Doe

Office Sought: Senate President Other (specify) _____

Disbursement For: Primary General Other (specify) _____

State: **US** District: **1**

FEC Identification Number
C

Amount of Each Disbursement This Period
\$2,800.00

Memo Item

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B. Common schedule errors

1. Include correct schedules

The Detailed Summary Page gives cues as to which schedules will need to be included with the filing. For example, if the committee has an amount on Line 23, a Schedule B will need to be included in your filing to support the amount on Line 23 of the Detailed Summary Page.

2. Fill out the schedule completely

If the committee files electronically, it is helpful to look at the report as it appears filled in on the FEC Forms. Add any missing information, including purposes of disbursement or employer and occupation information.

Common Schedule Errors

- ▣ **Include all information required by each schedule:**
 - **Full name of contributor**
 - **Employer/occupation information**
 - **Purposes of disbursement**
 - **Purposes for debts**

Best Efforts Statements

- ▣ **Can be filed “preemptively” at the beginning of a year or election cycle**
- ▣ **Be sure your statement:**
 - **Outlines your committee’s set procedure**
 - **Includes each of the required steps outlined in the campaign or committee guide**
- ▣ **Retain detailed records of your follow-up requests (copies of letters, emails, phone logs)**

C. **Best efforts statements**

Common Math Errors

- ▣ Cash on Hand
- ▣ Detailed Summary Page
 - Line totals
 - Column B figures (YTD or ECTD)
- ▣ Amendments

SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS

FEC Form 278 (Rev. 02/2018) Page 2

State or Type Committee Name: _____

Report Covering the Period: From: **04 01 2019** To: **06 30 2019**

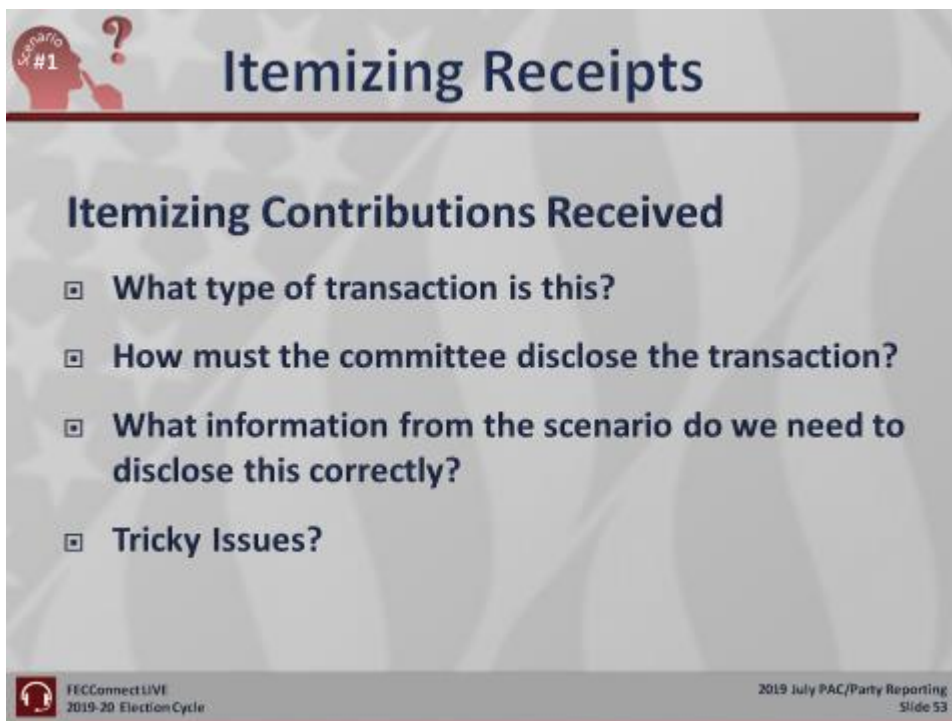
	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, _____		
(b) Cash on Hand at Beginning of Reporting Period _____		
(c) Total Receipts from Line 10b _____		
(d) Subtract (add) Lines 6(b) and 8(c) for Column A and Lines 6(c) and 8(c) for Column B _____		
7. Total Disbursements (from Line 3f) _____		
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6c):	86,753.09	
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D): _____		
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D): _____		

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- D. Common math errors**
1. **Cash on hand**
The ending balance of the last report should match the opening balance of the current report.
 2. **Use the Detailed Summary Page to conduct a quality check for columns A and B**
 - Ensure that each of the “total” lines equals the sum of the lines supporting that total line.
 - Do the math to ensure that the Column B figure (Year-To-Date) is correct. Column B from last report + Column A from this report = Column B for this report.
 3. **Amendments**
Math errors like those mentioned above occur frequently when a committee amends a past report and does not file all subsequent reports. For changes made to an old report, the committee may need to file all subsequent amendments in many cases, including if any contributions or disbursements moved lines, if activity moved to a different report, or if activity is added or removed from that reporting period. A small adjustment on a past report can affect each of the following reports.

Reporting Scenario #1: Itemizing Contributions Received



The slide features a red silhouette of a head with a question mark and the text 'Scenario #1' in the top left corner. The main title 'Itemizing Receipts' is in a large, dark blue font. Below it, the subtitle 'Itemizing Contributions Received' is in a smaller, dark blue font. A list of four questions follows, each preceded by a square bullet point. The bottom of the slide contains a footer with a red circular logo on the left, the text 'FECConnect LIVE 2019-20 Election Cycle' in the center, and '2019 July PAC/Party Reporting Slide 53' on the right.

Itemizing Receipts

Itemizing Contributions Received

- ▣ What type of transaction is this?
- ▣ How must the committee disclose the transaction?
- ▣ What information from the scenario do we need to disclose this correctly?
- ▣ Tricky Issues?

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On June 22, 2019, candy bar manufacturers and partners Mike and Ike write a contribution check for \$10,000 to the Citizens Who Love Candy PAC, a federal nonconnected PAC. The PAC receives their check on June 25. They used their personal joint account for this contribution, but were careful to both sign the check and note how much to attribute to each partner.

How should this contribution be reported by the PAC? (Assume that the PAC files on a monthly basis and that neither Mike nor Ike have contributed to the PAC this year.)

Scenario #1

Itemizing Receipts

Mike and Ike
1001 Candy Cane Lane
Confection, CA 00000

1936

June 22, 2019
DATE

PAY TO THE ORDER OF American Candy PAC \$ 10,000.00

Ten thousand and 00/100 ----- DOLLARS

FOR \$5,000 – Mike; \$5,000 - Ike

Mike Ike


@000000186: 000000529 1000

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- 1. What type of transaction is this?**
Answer: Mike and Ike have each made a \$5,000 contribution to the PAC.
- 2. How must the committee disclose the transaction(s)?**
Answer: Since the PAC has now received aggregate contributions from Mike and Ike that exceed \$200 in the calendar year, it must itemize each contribution on the July Monthly Report (covering June 1-30) on Schedule A, Line 11a(i), along with each contributor's aggregate year-to-date total (\$5,000) and contributor information.

See reporting example on next page



Scenario #1

Report Individual Contributions as Receipts (July Monthly)

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE OF
			<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 12
			<input type="checkbox"/> 11b	<input type="checkbox"/> 16
			<input type="checkbox"/> 11c	<input type="checkbox"/> 17
			<input type="checkbox"/> 13	<input type="checkbox"/> 14
			<input type="checkbox"/> 15	<input type="checkbox"/> 16

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
American Candy PAC

A. Mike
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

Mailing Address
1001 Candy Cane Lane

City: **Confection** State: **CA** Zip Code: **00000**

FEC ID number of contributing federal political committee: **C**

Name of Employer (for Individual): **Mike & Ike, Inc.** Occupation (for Individual): **Candy Maker**

Receipt For: Primary General Other (specify) ▼

Aggregate Year-to-Date: **5,000.00**

Date of Receipt: **06 / 25 / 2019**

Amount of Each Receipt this Period: **5,000.00**

Memo Item

B. Ike
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

Mailing Address
1001 Candy Cane Lane

City: **Confection** State: **CA** Zip Code: **00000**

FEC ID number of contributing federal political committee: **C**

Name of Employer (for Individual): **Mike & Ike, Inc.** Occupation (for Individual): **Candy Maker**

Receipt For: Primary General Other (specify) ▼


Aggregate Year-to-Date: **5,000.00**

Date of Receipt: **06 / 25 / 2019**

Amount of Each Receipt this Period: **5,000.00**

Memo Item

Schedule A, Line 11(a)(i)



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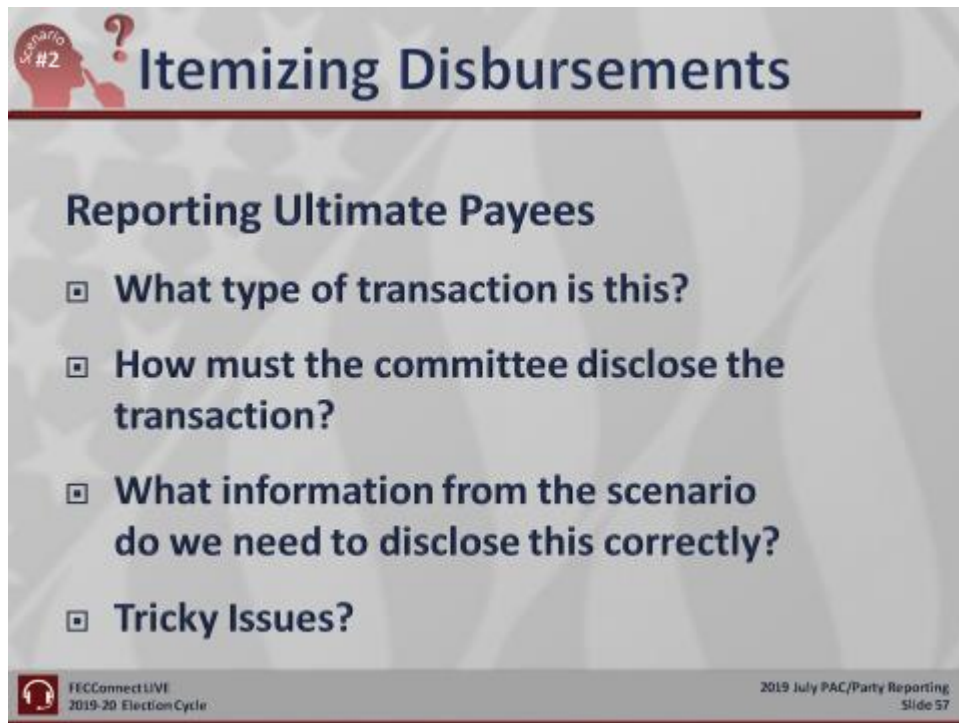
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3. **What information from the scenario do we need to disclose this correctly?**
Answer: Remember, for contributions greater than \$50, a committee must obtain the identity of the contributor and the date the contribution was received. The committee must also use “best efforts” to obtain, maintain and report the name of employer and occupation since their aggregate year-to-date contributions total to the PAC is greater than \$200 each in the calendar year.

Points to remember:

- Itemize contributions from an individual or other person/entity on Schedule A, Line 11(a)(i), once aggregate calendar year to date received exceeds \$200.
- **Required information in itemizing receipts:**
 - Full name and address of contributor or source
 - Occupation/employer – if contributor is an individual
 - Date of receipt
 - Amount
 - Aggregate year-to-date total of all receipts from the same source.
 - Optional, but encouraged: committee ID# where applicable
- Date reported is the date of receipt, not the date of deposit, or the date on the check.
- Don't fill in election information on Schedule A for individual contributions.

Reporting Scenario #2: Reporting Ultimate Payees



The slide features a red silhouette of a head with a question mark and the text 'Scenario #2' in the top left corner. The main title 'Itemizing Disbursements' is in a large, dark blue font. Below it, the sub-heading 'Reporting Ultimate Payees' is also in dark blue. A list of four questions follows, each preceded by a square bullet point. The footer contains the FECConnect LIVE logo and text, and the date '2019 July PAC/Party Reporting Slide 57'.

Scenario #2

Itemizing Disbursements

Reporting Ultimate Payees

- ▣ **What type of transaction is this?**
- ▣ **How must the committee disclose the transaction?**
- ▣ **What information from the scenario do we need to disclose this correctly?**
- ▣ **Tricky Issues?**

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On June 5, Joy Almond, the treasurer for Citizens who Love Candy PAC, realizes that the office is low on supplies. She runs out to the nearby Staples office supply store and uses her personal funds to purchase \$750.00 worth of office supplies. She is reimbursed by the PAC in full on June 30, 2019.

1. What type of transaction is this?


Answer: Joy's initial purchase is an advance of personal funds. When an individual who is not acting as a vendor advances personal funds to obtain goods or services that are used by a political committee, the committee must treat the individual's payment as a contribution and as an outstanding debt until reimbursed. 11 CFR 116.5.

2. How must the committee disclose the transaction(s)?

Answer: In this case, Joy made her advance and was reimbursed in the same reporting period. Therefore, the reimbursement made to her is itemized on Schedule B for Line 21b (Other Federal Operating Expenses). Joy is listed as the payee, along with her mailing address, and the date, amount and purpose of the reimbursement.

Because her payments to the vendor aggregated more than \$200 in a calendar year, the PAC must also include a memo entry that includes the name and address of the vendor, as well as the date, amount and purpose of the repayment.

See reporting example on next page



Scenario #2

Report Reimbursement (July Monthly)

Made and Reimbursed in Same Period

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)
 21b 22 23 26 27
 28a 28b 28c 29 30b

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NAME OF COMMITTEE (In Full)
American Candy PAC

Full Name (Last, First, Middle Initial)
A. Almond, Joy

Mailing Address
460 E. 32nd Street

City
New York State
NY Zip Code
10024

Purpose of Disbursement
Reimbursement for office supplies

Candidate Name

Office Sought: House Senate President
 Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement
06 / 30 / 2019

FEC Identification Number
C

Amount of Each Disbursement this Period
750.00

Memo Item

Full Name (Last, First, Middle Initial)
B. Staples

Mailing Address
900 W. 79th Street

City
New York State
NY Zip Code
10024

Purpose of Disbursement
Office supplies

Candidate Name

Office Sought: House Senate President
 Disbursement For: Primary General Other (specify) ▼


State: District:

Date of Disbursement
06 / 05 / 2018

FEC Identification Number
C

Amount of Each Disbursement this Period
750.00

Memo Item



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3. **What information from the scenario do we need to disclose this correctly?**
Answer: To itemize ultimate payees, the PAC needs not only Joy’s name and address, but also the date she made the initial payment to the vendor, as well as the vendor’s name and address. The specific purpose of the disbursement must be listed and must meet the qualifications to be considered an “adequate” purpose.

Points to Remember:

- Disbursements are itemized when payments made to a specific payee aggregate more than \$200 in a calendar year.
- In these two situations, the political committee must provide additional information about a vendor who was the ultimate payee:
 - The committee reimburses an individual who used personal funds to pay committee expenses aggregating more than \$200 to a single vendor;
 - The committee’s payment of its credit card bill includes charges of more than \$200 to a single vendor;
- See the Notice of Interpretive Rule at 78 FR 40625 (July 8, 2013) (online at https://transition.fec.gov/law/cfr/ej_compilation/2013/notice2013-09.pdf) and <https://www.fec.gov/updates/reporting-ultimate-payees-for-committee-disbursements-re-draft-interpretive-rules/> for more information on reporting ultimate payees.

Reporting Scenario #3: Contributions Made to Candidates (Federal vs. Nonfederal)

Scenario #3 ?

Itemizing Contributions

To Federal Candidates

- Disclosed on Schedule B supporting Line 23 of Detailed Summary Page
- Include office sought, state & district (if applicable)
- Include election designation

To Nonfederal Candidates

- Disclosed on Schedule B supporting Line 29 of Detailed Summary Page

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Contributions made to federal candidates

- Disclosed on Schedule B supporting Line 23
- Include office sought, state & district (if applicable)
- Include election designation

Contributions made to nonfederal candidates

- Disclosed on Schedule B supporting Line 29

See reporting examples on next page



Report Contribution Made to Federal Candidate (June Monthly)

Schedule B, Line 23

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE	OF
<input type="checkbox"/>	21b	<input type="checkbox"/>	22	<input checked="" type="checkbox"/>	23	<input type="checkbox"/>	26
<input type="checkbox"/>	28a	<input type="checkbox"/>	28b	<input type="checkbox"/>	28c	<input type="checkbox"/>	27
<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	29
<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	30b

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NAME OF COMMITTEE (In Full)
American Candy PAC

Full Name (Last, First, Middle Initial)
A. Committee to Elect Baby Ruth

Date of Disbursement
05 / 19 / 2019

Mailing Address
1776 Washington Street

City
Providence State
RI Zip Code
00001

Purpose of Disbursement
Contribution Category/Type
011

Candidate Name
Baby Ruth

Office Sought: House Senate President

Disbursement For: Primary General Other (specify) ▼

State: **RI** District: **02**

FEC Identification Number
C

Amount of Each Disbursement this Period
5,000.00

Memo Item



Report Contribution Made to Non-Federal Candidate (July Monthly)

Schedule B, Line 29

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)		PAGE	OF
<input type="checkbox"/>	21b	<input type="checkbox"/>	22	<input type="checkbox"/>	23	<input checked="" type="checkbox"/>	26
<input type="checkbox"/>	28a	<input type="checkbox"/>	28b	<input type="checkbox"/>	28c	<input type="checkbox"/>	27
<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	29
<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
American Candy PAC

Full Name (Last, First, Middle Initial)
A. Re-Elect Bazooka Bubble for Governor

Date of Disbursement
06 / 03 / 2019

Mailing Address
873 Long Drive

City
Aberdeen State
MD Zip Code
21001

Purpose of Disbursement
Nonfederal contribution Category/Type
011

Candidate Name
Not Applicable

Office Sought: House Senate President


Disbursement For: Primary General Other (specify) ▼

State: District:

FEC Identification Number
C

Amount of Each Disbursement this Period
1,000.00


Memo Item



Returned vs. Refunded

PACs & Parties

- ▣ **Returned, Lost or Voided checks**
 - Negative entry on line number where transaction was originally disclosed
- ▣ **Refunds**
 - Refund check from another committee appears on Schedule A for Line 16



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Voids or returned/uncashed checks:

Disclosed as negative entries on the schedule supporting the Detailed Summary Page line number where the transaction was originally disclosed.

Report Uncashed Check as Negative Disbursement (July Monthly)

Schedule B, Line 23

SCHEDULE B (FEC Form 3X)	FOR LINE NUMBER: (check only one)	PAGE	OF
ITEMIZED DISBURSEMENTS	<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 26 <input type="checkbox"/> 27		
Use separate schedule(s) for each category of the Detailed Summary Page			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

American Candy PAC


A. Committee to Elect Baby Ruth	Date of Disbursement
Mailing Address 1776 Washington Street	06 / 22 / 2019
City: Providence State: RI Zip Code: 00001	FEC Identification Number
Purpose of Disbursement Check uncashed	C
Candidate Name Baby Ruth	Amount of Each Disbursement this Period
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	- 5,000.00
Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	<input type="checkbox"/> Memo Item Check uncashed See June Monthly
State: RI District: 02	

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Refunds:

When a refund check is actually received from another committee and deposited into the federal account, it should be disclosed on Schedule A for Line 16 as a receipt.



Scenario #3

Report Refund of Contribution Made as Receipt (July Monthly)


Schedule A, Line 16

SCHEDULE A (FEC Form 3X)	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE OF
ITEMIZED RECEIPTS		<input type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14
		<input type="checkbox"/> 11c 15	<input type="checkbox"/> 12 <input checked="" type="checkbox"/> 16 <input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

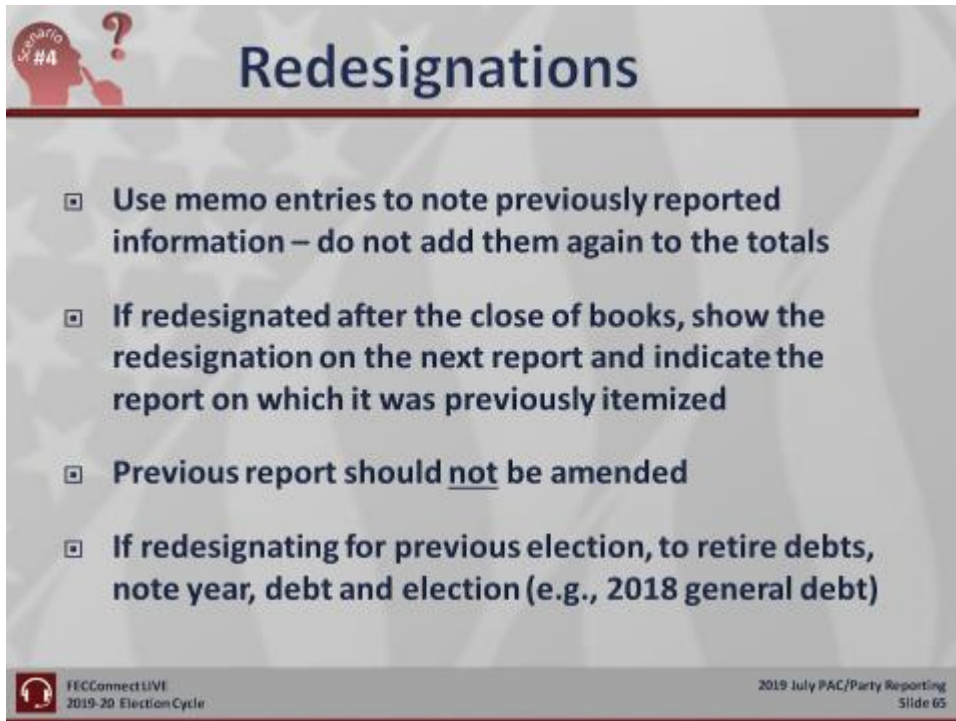
NAME OF COMMITTEE (In Full)
American Candy PAC

A. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name Cracker Jack for Congress	Date of Receipt <div style="display: flex; justify-content: space-around;"> 06 / 01 / 2019 </div>
Mailing Address 777 Sunshine Lane	Amount of Each Receipt this Period <div style="border: 1px solid gray; padding: 2px; display: inline-block;">500.00</div>
City Tampa State FL Zip Code 33614	<input type="checkbox"/> Memo Item
FEC ID number of contributing federal political committee. C 00000001	Aggregate Year-to-Date <div style="border: 1px solid gray; padding: 2px; display: inline-block;">500.00</div>
Name of Employer (for Individual) Occupation (for Individual)	<div style="border: 2px solid red; padding: 5px; text-align: center; font-weight: bold; color: red;"> Contribution itemized in April Monthly </div>
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	


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Reporting Scenario #4: Curing Excessive Contributions – Redesignations/Reattributions



Redesignations

- ▣ Use memo entries to note previously reported information – do not add them again to the totals
- ▣ If redesignated after the close of books, show the redesignation on the next report and indicate the report on which it was previously itemized
- ▣ Previous report should not be amended
- ▣ If redesignating for previous election, to retire debts, note year, debt and election (e.g., 2018 general debt)

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Redesignations of excessive contributions

- Use memo entries to note previously reported information – do not add them again to the totals.
- If redesignated after the close of books, show the redesignation on the next report and indicate the report on which it was previously itemized.
- Previous report should not be amended.
- If redesignating for previous election, to retire debts, be sure to note year, debt and election (e.g., 2018 general debt).

See reporting examples on next page



Report Contribution Made as Disbursement (May Monthly)

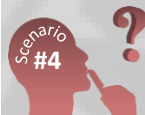
Schedule B, Line 23

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE OF
			<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29 <input type="checkbox"/> 30b	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full) American Candy PAC				
Full Name (Last, First, Middle Initial) A. Committee to Elect Kit Kat			Date of Disbursement 04 / 21 / 2019	
Mailing Address 1060 West Addison Street			FEC Identification Number C	
City Chicago		State IL	Zip Code 60613	Amount of Each Disbursement this Period 6,000.00
Purpose of Disbursement Contribution		Category/Type 011		Memo Item <input type="checkbox"/>
Candidate Name Kit Kat		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President		State: IL District:		



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SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE OF
			<input type="checkbox"/> 21b <input type="checkbox"/> 22 <input checked="" type="checkbox"/> 23 <input type="checkbox"/> 26 <input type="checkbox"/> 27 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29 <input type="checkbox"/> 30b	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full) American Candy PAC				
Full Name (Last, First, Middle Initial) A. Committee to Elect Kit Kat			Date of Disbursement 04 / 21 / 2019	
Mailing Address 1060 West Addison Street			FEC Identification Number C	
City Chicago		State IL	Zip Code 60613	Amount of Each Disbursement this Period 6,000.00
Purpose of Disbursement Contribution		Category/Type 011		Memo Item <input checked="" type="checkbox"/> As disclosed on May Monthly Redesignation below
Candidate Name Kit Kat		Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President		State: IL District:		
Full Name (Last, First, Middle Initial) B. Committee to Elect Kit Kat			Date of Disbursement 06 / 02 / 2019	
Mailing Address 1060 West Addison Street			FEC Identification Number C	
City Chicago		State IL	Zip Code 60613	Amount of Each Disbursement this Period - 1,000.00
Purpose of Disbursement Contribution		Category/Type 011		Memo Item <input checked="" type="checkbox"/> Redesignated below
Candidate Name Kit Kat		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President		State: IL District:		
Full Name (Last, First, Middle Initial) C. Committee to Elect Kit Kat			Date of Disbursement 06 / 02 / 2019	
Mailing Address 1060 West Addison Street			FEC Identification Number C	
City Chicago		State IL	Zip Code 60613	Amount of Each Disbursement this Period 1,000.00
Purpose of Disbursement Contribution		Category/Type 011		Memo Item <input checked="" type="checkbox"/> Redesignation
Candidate Name Kit Kat		Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
Office Sought: <input checked="" type="checkbox"/> House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President		State: IL District:		

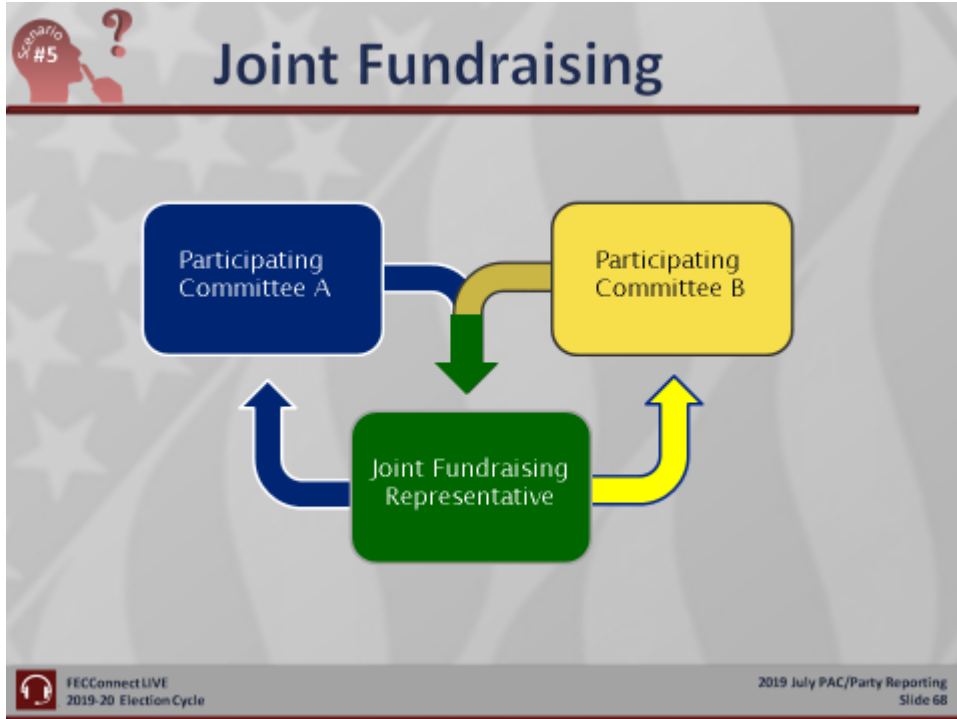
Report
Redesignation
of Contribution
Made
(July Monthly)

Schedule B,
Line 23



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The slide is titled 'Joint Fundraising' and features a red icon with 'Scenario #5' and a question mark. The main heading is 'What is Joint Fundraising?'. Below this, a definition is provided: 'Joint fundraising is election-related fundraising conducted jointly by a political committee and one or more other political committees or unregistered organizations'. The background has a faint American flag pattern. The footer at the bottom left contains the 'FECConnect LIVE 2019-20 Election Cycle' logo, and the bottom right contains the text '2019 July PAC/Party Reporting Slide 69'.

What is joint fundraising (11 CFR 102.17) (Guide, pp. 131-136)

Joint fundraising is fundraising conducted jointly by a political committee and one or more other political committees or unregistered organizations.

Who must observe joint fundraising rules?

The participants in joint fundraising activity may include:

- Party committees
- Party organizations not registered as political committees;
- Federal and nonfederal candidate committees;
- Nonparty political committees (e.g., federal PACs); and
- Unregistered nonparty organizations (e.g., nonfederal PACs).

Joint Fundraising

- ▣ **Name joint fundraising representative (JFR) and sign agreement**
- ▣ **Set up separate account for all receipts and expenditures for joint fundraiser**
- ▣ **File Form 1 (or amend); List all participating committees**
- ▣ **Participating committees amend Form 1 to list JFR**


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General guidelines

All participants engaging in a joint fundraising effort as described in section 102.17 of the Commission regulations, including unregistered organizations, must:


- Create or select a political committee to act as the fundraising representative.
- Agree to a formula for allocating proceeds and expenses.
- Sign a written agreement naming the fundraising representative and stating the allocation formula.
- Establish a separate account for joint fundraising receipts and disbursements.
- Notify the public of the allocation formula and certain other information when soliciting contributions.



Joint Fundraising

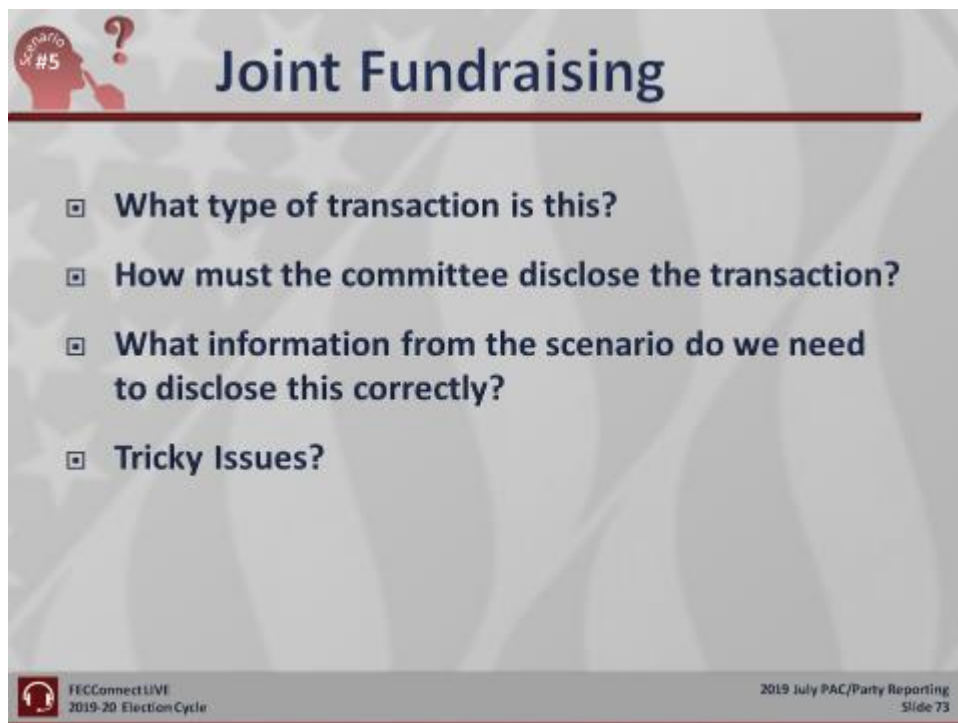
Reporting Tips for Participants

- ✓ Gross receipts (on memo Schedule A) should be \geq net receipts (i.e., JFR transfers)
- ✓ Use one memo Schedule A entry to disclose total gross unitemized (< \$200 aggregate) receipts (e.g., “Unitemized Receipts – JF Representative PAC”)
- ✓ Use purpose or transaction description field on memo Schedule A to link to joint fundraising net transfer –
*Key when participating in multiple joint fundraisers

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Reporting Scenario #5: Joint Fundraising



The slide features a red silhouette of a head with a question mark and the text 'Scenario #5' in the top left corner. The title 'Joint Fundraising' is centered at the top. Below the title, four questions are listed in a bulleted format. The bottom of the slide contains a footer with the FECConnect LIVE logo and text, and the date '2019 July PAC/Party Reporting Slide 73'.

Scenario #5

Joint Fundraising

- ▣ **What type of transaction is this?**
- ▣ **How must the committee disclose the transaction?**
- ▣ **What information from the scenario do we need to disclose this correctly?**
- ▣ **Tricky Issues?**

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In February 2019, the California Freedom Party Committee hosts a joint fundraiser called “Cosmo Kramer Victory 2020” to benefit the party and Senator Cosmo Kramer. The Senator and the Party agree to split the proceeds 50-50. To prepare for the event, the Victory 2020 joint fundraising committee contracts for \$20,000 worth of banquet services at Monk’s Café a week before the event. George Costanza, a sports executive, purchases two \$2,000 tickets to attend. George’s friend, Elaine Benes, decides to join him and buys two \$1,000 tickets. Overall, ticket sales bring in \$100,000 in individual contributions.

1. **What are the first steps both committees must take?**

Answer:

- Name and establish a joint fundraising representative
- Set up a separate account for both receipts and expenditures for the fundraiser, and
- As joint fundraising participants, the party and the candidate committee must amend their Statements of Organization (Form 1) to list the fundraising representative as such (“Joint Fundraising Representative”) on Line 6 and the bank used for the new account(s) as a depository (if necessary).
- The joint fundraising representative (Victory 2020 joint fundraising committee) must register (or amend its Form 1) and also include the names of all participating committees as such (“Joint Fundraising Participants”) on Line 5.

2. **Is Costanza’s contribution permissible? Why or why not?**

Answer: Conceivably, yes, provided the \$2,000 per committee he contributed by buying the tickets didn’t max him out to either participant.

3. **How would the joint fundraising participant committees report these receipts?**

Answer: Show itemized transfer in of net proceeds on Schedule A/Line 12 (\$40,000, for sake of argument). Then show itemized gross **memo** entries on Schedule A:

- Costanza: \$2,000
- Benes: \$1,000
- Unitemized receipts of < \$200 each: \$39,000

Report Receipt as Transfer-In (Mid-Year)

Schedule A, Line 12

SCHEDULE A (FEC Form 3X)	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE OF
ITEMIZED RECEIPTS		<input type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14
		<input type="checkbox"/> 11c 15	<input checked="" type="checkbox"/> 12 16
		<input type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

California Freedom Party Committee

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Cosmo Kramer Victory 2020	Date of Receipt <div style="display: flex; justify-content: space-around;"> M M / D D / Y Y Y Y </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> 02 15 2019 </div>
Mailing Address 1050 Sunset Blvd.	Amount of Each Receipt this Period <div style="border: 1px solid black; padding: 2px; display: inline-block; font-weight: bold;">40,000.00</div>
City Los Angeles	
State CA	<input type="checkbox"/> Memo Item
Zip Code 90028	
FEC ID number of contributing federal political committee. <div style="border: 1px solid black; padding: 2px; display: inline-block;">C</div>	Aggregate Year-to-Date ▼ <div style="border: 1px solid black; padding: 2px; display: inline-block; font-weight: bold;">40,000.00</div>
Name of Employer (for Individual) Occupation (for Individual)	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	

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Reporting example continues on next page



Report Receipts as Transfers-In Itemized (Mid-Year)

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		FOR LINE NUMBER: (check only one)	PAGE	OF		
Use separate schedule(s) for each category of the Detailed Summary Page		<input type="checkbox"/> 11a <input type="checkbox"/> 13	<input type="checkbox"/> 11b <input type="checkbox"/> 14	<input type="checkbox"/> 11c <input type="checkbox"/> 15	<input checked="" type="checkbox"/> 12 <input type="checkbox"/> 16	<input type="checkbox"/> 17
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.						
NAME OF COMMITTEE (In Full) California Freedom Party Committee						
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. George Costanza		Date of Receipt 02 / 10 / 2019				
Mailing Address 1344 Queens Boulevard City: New York State: NY Zip Code: 11435		Amount of Each Receipt this Period 2,000.00				
FEC ID number of contributing federal political committee. C		<input checked="" type="checkbox"/> Memo Item				
Name of Employer (for Individual) New York Yankees Occupation (for Individual) Asst to Travel Sec.		Cosmo Kramer Victory 2020				
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date 2,000.00				
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Elaine Benes		Date of Receipt 02 / 10 / 2019				
Mailing Address 78 West 86th Street, Apt. 3-E City: New York State: NY Zip Code: 10024		Amount of Each Receipt this Period 1,000.00				
FEC ID number of contributing federal political committee. C		<input checked="" type="checkbox"/> Memo Item				
Name of Employer (for Individual) J. Peterman, Inc. Occupation (for Individual) President		Cosmo Kramer Victory 2020				
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date 1,000.00				

Schedule A,
Line 12



Report Receipts as Transfers-In Unitemized (Mid-Year)

Schedule A, Line 12

SCHEDULE A (FEC Form 3X) ITEMIZED RECEIPTS		FOR LINE NUMBER: (check only one)	PAGE	OF		
Use separate schedule(s) for each category of the Detailed Summary Page		<input type="checkbox"/> 11a <input type="checkbox"/> 13	<input type="checkbox"/> 11b <input type="checkbox"/> 14	<input type="checkbox"/> 11c <input type="checkbox"/> 15	<input checked="" type="checkbox"/> 12 <input type="checkbox"/> 16	<input type="checkbox"/> 17
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.						
NAME OF COMMITTEE (In Full) California Freedom Party Committee						
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Cosmo Kramer Victory 2020		Date of Receipt 02 / 10 / 2019				
Mailing Address 1050 Sunset Blvd. City: Los Angeles State: CA Zip Code: 90028		Amount of Each Receipt this Period 39,000.00				
FEC ID number of contributing federal political committee. C		<input checked="" type="checkbox"/> Memo Item				
Name of Employer (for Individual) Occupation (for Individual)		Unitemized Receipts Cosmo Kramer Victory 2020				
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date 39,000.00				

Joint fundraising activity

- Joint fundraising representative must be registered with Commission (either as new committee or if existing committee, must set up a separate depository account) if the participants are establishing a joint fundraising effort as described in Commission regulations.
- Contributor may contribute an amount to the joint fundraising effort that represents the total amount the contributor could contribute to all participants under the applicable contribution limits.
- Joint fundraising representative must first pay costs of fundraiser before transferring net proceeds to participants.
- Memo entries itemizing contributors must clearly cross-reference the fundraising representative transfer.
- If memo entries are provided, make sure there is a corresponding transfer. Vice versa, if a transfer is provided, make sure there are corresponding memo entries.



Scenario #6 ?

Independent Expenditures

Expenditure for a communication that expressly advocates the election or defeat of a clearly identified candidate, that is not made in cooperation, consultation, or concert with, or at the request or suggestion of a candidate or his/her agents.

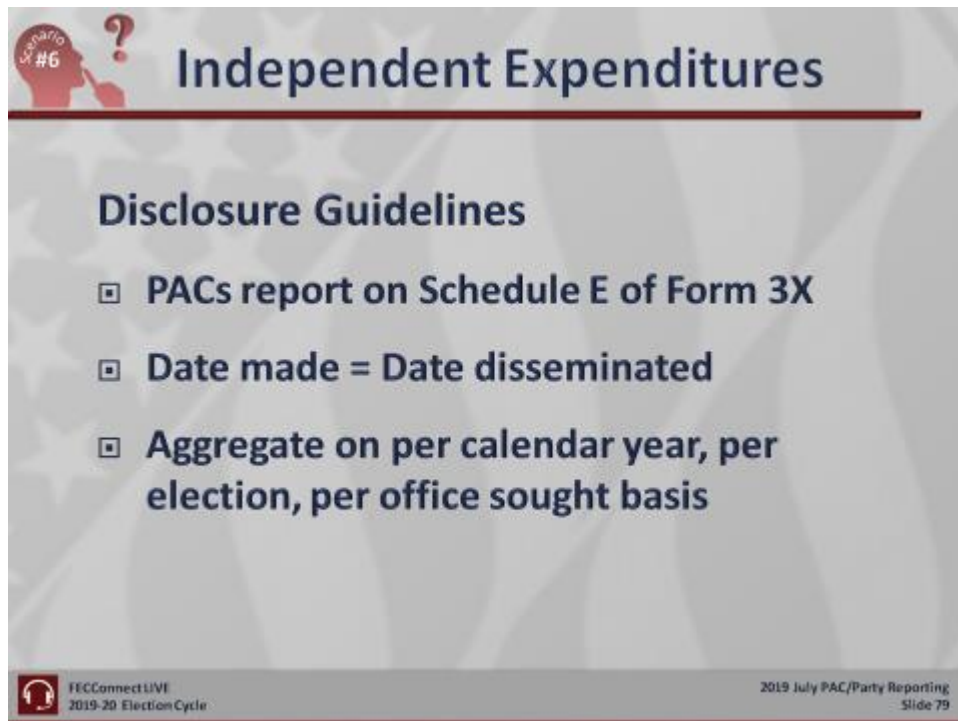
EXPRESS ADVOCACY

NO COORDINATION

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Independent expenditures – definition

Expenditure for communication that “expressly advocates” the election or defeat of a clearly identified candidate and that is not made in cooperation with, or at the suggestion of, the candidate or his/her campaign or its agents, or a political party or its agents.



Scenario #6 ?

Independent Expenditures

Disclosure Guidelines

- ▣ PACs report on Schedule E of Form 3X
- ▣ Date made = Date disseminated
- ▣ Aggregate on per calendar year, per election, per office sought basis

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Independent expenditures – disclosure

Report using Schedule E/FEC Form 3X during appropriate reporting period.

Date made = date disseminated

- An independent expenditure is considered made when it is publicly distributed or otherwise publicly disseminated.
- See the FEC’s interpretive rule at 76 FR 16233 (October 4, 2011) (online at https://transition.fec.gov/law/cfr/ej_compilation/2011/notice_2011-13.pdf)

Aggregation

Done on per calendar year, per election, per office sought (race) basis.

Independent Expenditures

- **48-Hour Reports**
 - Required for:
 - IEs aggregating ≥ \$10,000
 - Made 20 days or more before an election
- **24-Hour Reports**
 - Required for:
 - IEs aggregating ≥ \$1,000
 - Made < 20 days but > 24 hours before an election
- **Disclose again on next regular report**

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Additional reporting on 48- and 24-hour basis:

- **48-hour reporting (11 CFR 104.5(g)(1))**
 - Must file a **48-hour report** for independent expenditures that aggregate \$10,000 or more, anytime during a calendar year up to and including the 20th day before an election.
 - A 48-hour report is required each time an additional \$10,000 is aggregated in independent expenditures.
- **24-hour reporting (11 CFR 104.5(g)(2))**
 - Must file a **24-hour report** for independent expenditures aggregating \$1,000 or more made less than 20 days but more than 24 hours before the day of an election.
 - A 24-hour report is required each time an additional \$1,000 is aggregated in independent expenditures.
- **48- and 24-hour report** is filed using stand-alone Schedule E; check appropriate box to note type of report.

Reporting Scenario #6: Large Last-Minute Independent Expenditures

The California Freedom Party Committee would like to help Daenerys Targaryen who is running in the general election for California's 25th district in November 2020. The Targaryen Campaign did not have any contact with any representative of the party committee.

The party decides to run a series of radio ads to support Targaryen's election campaign. Just before the November 3 general election, the party committee contracts with the LA County Daily News to run a \$10,000 newspaper ad on October 23, supporting Targaryen. The bill for the ads was paid on November 26.

1. What type of transaction is this?

Answer: The party committee is making an independent expenditure, defined as an expenditure for a communication that "expressly advocates" the election or defeat of a clearly identified candidate and that is not made in cooperation with, or at the request or suggestion of, the candidate or his/her campaign or its agents, or a political party or its agents.

2. How must the committee disclose the transaction(s)?

Answer: An independent expenditure is considered made when it is publicly distributed or otherwise publicly disseminated. If it aggregates \$1,000 or more and is made less than 20 days but more than 24 hours before the day of an election, as this expenditure did, the party must file a 24-Hour Report on Schedule E disclosing the independent expenditure. The party committee must disclose the independent expenditure again, on Schedule E, for the next regular FEC report (Post-General Report).

See reporting example on next page

Scenario #6

Initial 24-Hour Report

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE 1 OF 1
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full): **California Freedom Party Committee**

FEC IDENTIFICATION NUMBER: **C 00000004**

24-hour report 48-hour report

Full Name of Payee: **The L.A. County Daily News**

Mailing Address: **1700 Sunburst Ave.**

City: **El Segundo** State: **CA** Zip Code: **90245**

Purpose of Expenditure: **Newspaper Ad**

Name of Federal Candidate: **Daenerys Targaryen**

Calendar Year-To-Date Per Election for Office Sought: **\$10,000.00**

Date of Public Distribution/Dissemination: **10 / 23 / 2020**

Amount: **\$10,000.00**

Date of Disbursement or Obligation: [] / [] / []

Office Sought: House District: **25**
 President Senate State: **CA**

Disbursement For: Primary General
 Other (specify) ▶

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3. **What information from the scenario do we need to disclose this correctly?**
Answer: Key facts in the scenario include the date of dissemination (10/23), the fact that it is an advertisement that contained express advocacy, and was not coordinated with the campaign. The party committee will also need to disclose the payee’s name and address, the candidate information, the purpose of the expenditure, the amount and the calendar year-to-date per election for the office sought.

On the next report filed (Post-General report, covering activity through 11/23, and due on 12/3), the party committee must report the same information disclosed on the 24-hour report on Schedule E as a MEMO entry because the payment has not been made as of the close of books for the Post-General report. Accordingly, the party committee must report a debt on Schedule D to “The LA County Daily News” until it is settled.

See reporting example on next page

Scenario #6 **Post-General (30G) Report**

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE 1 OF 1
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full): **California Freedom Party Committee**
FEC IDENTIFICATION NUMBER: **C 00000004**

Check if 24-hour report 48-hour report New report Amends report filed on

Full Name of Payee: **The L.A. County Daily News** **X Memo Item** Date of Public Distribution/Dissemination: **10/23/2020**

Mailing Address: **1700 Sunburst Ave.**
City: **El Segundo** State: **CA** Zip Code: **90245**
Amount: **\$10,000.00**

Purpose of Expenditure: **Newspaper Ad** Category/Type:

Name of Federal Candidate: **Daenerys Targaryen** Support Oppose
Office Sought: House President Senate District: **25** State: **CA**

Calendar Year-To-Date Per Election for Office Sought: **\$10,000.00**
Disbursement For: Primary General Other (specify) ▶

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Scenario #6 **Debt Owed – 30G Report**

SCHEDULE D (FEC Form 3X)
DEBTS AND OBLIGATIONS
Excluding Loans

(Use separate schedule(s) for each numbered line) PAGE 1 OF 1
FOR LINE NUMBER: (check only one) 9 10

NAME OF COMMITTEE (In Full): **California Freedom Party Committee**

A. Full Name (Last, First, Middle Initial) of Debtor or Creditor: **The L.A. County Daily News** Nature of Debt (Purpose): **Newspaper Ad/IE 10/23/20**


Mailing Address: **1700 Sunburst Ave.**
City: **El Segundo** State: **CA** Zip Code: **90245**

Outstanding Balance Beginning This Period: **\$0.00**
Amount Incurred This Period: **\$10,000.00** Payment This Period: **\$0.00** Outstanding Balance at Close of This Period: **\$10,000.00**

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When full payment is made to the vendor on 11/26/20, it must be reflected on Schedule E supporting Line 24, as well as on Schedule D supporting Line 10 of the Year-End Report (coverage period: 11/24/20-12/31/20) due January 31, 2021.

Note: the date of disbursement reflects the date of the payment to the vendor.




Scenario #6

Payment – Year-End (YE) Report

SCHEDULE E (FEC Form 3X)
ITEMIZED INDEPENDENT EXPENDITURES

PAGE **1** OF **1**
FOR LINE 24 OF FORM 3X

NAME OF COMMITTEE (In Full) California Freedom Party Committee			FEC IDENTIFICATION NUMBER ▼ C 00000004		
Check if <input type="checkbox"/> 24-hour report <input type="checkbox"/> 48-hour report			New report <input type="checkbox"/> Amends report filed on <input type="text" value="MM/YY"/>		
Full Name of Payee The L.A. County Daily News			Date of Public Distribution/Dissemination 10/23/2020		
Mailing Address 1700 Sunburst Ave.			Amount \$10,000.00		
City El Segundo	State CA	Zip Code 90245	Date of Disbursement or Obligation 11/26/2020		
Purpose of Expenditure Newspaper Ad – 10/23/20			Category/Type <input type="text"/>		
Name of Federal Candidate: Daenerys Targaryen			Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> President <input type="checkbox"/> Senate		
Calendar Year-To-Date Per Election for Office Sought \$10,000.00			District: 25 State: CA Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▶		



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Reporting example continues on next page

- Last-minute independent expenditures must be disclosed again on Schedule E of the next scheduled report that the committee files.
- A 24-hour report is required each time an additional \$1,000 is aggregated in independent expenditures.


- **48-hour reporting**
 - In addition, must file a **48-hour report** for independent expenditures that aggregate \$10,000 or more, anytime during a calendar year up to and including the 20th day before an election.
 - Use Schedule E on Form 3X – check “48-hour” box.
 - Must be received by FEC within 48 hours after expenditure is publicly distributed or otherwise publicly disseminated.
 - Must be certified (signed) by treasurer (e-filers should type the treasurer’s name following the certification on the Report).
 - For paper filers, can use overnight delivery, hand-delivery or fax to 202-219-0174 (certified or registered mail date will not be considered filed date for these).
 - Last-minute independent expenditures must be disclosed again on Schedule E of the next scheduled report that the committee files.
 - Aggregation is done on a per calendar year, per election, per office sought (race) basis.
 - A 48-hour report is required each time an additional \$10,000 is aggregated in independent expenditures.

For IE 24- and 48-hour notice report periods:

<https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/>

Avoid Common Mistakes

- ▣ Check for math errors
- ▣ Include all required schedules, all information
- ▣ Provide all information required by schedule
- ▣ Consult form instructions available on FEC.gov
- ▣ Designate contributions
- ▣ Only enter contributors into reporting software once to avoid aggregation problems
- ▣ Ensure correct committee name disclosed for contributions made/received

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Avoiding common errors

- Check for math errors.
- Include all appropriate schedules.
- Provide all information required by schedule. Consult form instructions available on our web site at <https://www.fec.gov/help-candidates-and-committees/forms/>
- Designate all contributions made to Federal candidate committees. If not designated, contribution is applied towards next election and may result in excessive contribution. Also indicate year of election and check Primary or General. For Special, Runoff, Convention or Recount election, check “Other” and also include election type and year (e.g., “Special General 2018”).
- Avoid accidentally entering contributors multiple times into the committee’s reporting software program. This causes aggregation problems as well as excessive contributions to be reported.
- Ensure the correct committee name is disclosed for contributions made. Using an incorrect committee name creates data entry problems and errors on the public record.

Best Practices: Reporting

- ✓ Respond completely to RFAs by specified deadline
- ✓ Contact your analyst with any questions, especially if you are not sure what's wrong; the analyst can assist prior to the report being amended
- ✓ Consult the most recent copy of "inadequate purpose" list
- ✓ Make sure all purposes of disbursements disclosed are on "acceptable" list or would meet rule of thumb



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Best practices:

- Consult most recent copy of inadequate purpose list.
- Make sure all purposes of disbursements disclosed are on the "acceptable" list or would meet the rule of thumb.
- Respond completely to all RFAs by the deadline specified.
- Contact your analyst to clarify questions and issues. Please contact the analyst if you are unsure of what is wrong. The analyst can assist prior to the report being amended.

FEC Resources

- ▣ Compliance Help: <https://www.fec.gov/help-candidates-and-committees/>
- ▣ Call your Analyst: (800) 424-9530, option 5
- ▣ Email general questions to info@fec.gov
- ▣ E-Learning Videos: <https://www.youtube.com/FECTube>
- ▣ Latest updates, including FEC Record/Weekly Digest: <https://www.fec.gov/updates/>
- ▣ Educational Outreach: <https://www.fec.gov/help-candidates-and-committees/trainings/>

Compliance Help

Submit a question to the Reports Analysis Division (RAD)



Reports Analysis Division information:
<https://www.fec.gov/help-candidates-and-committees/question-rad/>

Objectives

- ▣ Review filing deadlines and application of “best efforts” for timely filing
- ▣ Learn about the Reports Analysis Division (RAD) review process and how best to respond to Requests for Additional Information (RAI)
- ▣ Discuss common reporting scenarios

Workshop Evaluation

Help Us Help You!
Please complete an evaluation
of this workshop.

<https://www.surveymonkey.com/r/2TQF6W2>

Evaluation Link: <https://www.surveymonkey.com/r/2TQF6W2>