

NEWSLETTER

Loosening of FEC Policy on Maintenance of Payroll Deduction Forms

May 2006

At its April 20, 2006 open meeting, the Federal Election Commission (FEC) revealed that it had changed its internal policy requiring maintenance of Payroll Deduction Authorization forms (PDAs) signed by individuals who participate in a PAC payroll deduction program. At this time, however, the new policy does not appear to be publicly available.

A description of the policy, which appeared in the Final Audit Report on CWA COPE Political Contributions Committee, said:

Prior to considering this audit report, the Commission reconsidered its policy regarding records required to be kept by PACs that receive contributions through automatic payroll deduction and concluded that documents other than PDAs can be used to verify such contributions. An example of other acceptable documentation is a listing provided to the PAC by the member's employer containing the contributors' names, along with the dates and amounts of the contributions that are included in the transmittal.

CWA COPE Political Contributions Committee is a labor union, and the example provided above applies specifically to labor union PACs. To date, the FEC has not provided any guidance as to what "documents other than PDAs can be used to verify such contributions" to corporate PACs.

Authors

Caleb P. Burns Partner 202.719.7451 cburns@wiley.law

wiley.law