FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

APR 17 1996

Robert Borchardt, Treasurer
Health Plan PAC of the American
Association of Health Plans
1129 20th Street, NW, #600
Washington, DC 20036

Identification Number: C00106740

Reference: Year End Report (7/1/95-12/31/95)

Dear Mr. Borchardt:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the dates of receipt and the aggregate year-to-date totals. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

-Please identify the name and address of the payee for the in-kind contribution(s) disclosed on Schedule B for Line 23.

-For your information, each category on the Detailed Summary Page for which your committee discloses activity must have a separate schedule. Please note this for future filings.

-For future filings, please note that your committee need only file the pages on which you have itemized activity. Schedules with no activity may be omitted.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on

9503043051

our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Debbie Manzano

Debbie Manzano
Reports Analyst
Reports Analysis Division

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Line 16. Refunds of Contributions

Itemize refunds of contributions made by the SSF on a Schedule A regardless of their amount. See Section 6 for more information on how to report them. Enter the total on Line 16.

Line 17. Other Receipts

This category includes interest and dividends earned on investments. Itemize these receipts on a Schedule A once the committee receives more than $200 from the same source during a calendar year. Enter the total under this category on Line 17. See Section 6 for more information on interest and dividends.

Line 18. Transfers from Nonfederal Account for Joint Activity

If the committee maintains a nonfederal account for state and local election activities and pays its own *administrative expenses*, the federal account (the SSF) may accept a transfer of funds from the nonfederal account for the sole purpose of covering its share of a joint federal and nonfederal expense. 106.6(e)(1)(i). Report the total amount transferred from the nonfederal account during the period (i.e., the total from Schedule H3) on Line 18.

Other rules concerning these transfers are explained in Appendix A.

4. Itemized Disbursements: Schedule B

When to Itemize Disbursements

Regardless of Amount

Several types of disbursements must be itemized regardless of amount:

- *Transfers* to *affiliated* SSFs;
- *Contributions* to *candidates* and *political committees*;
- Loan repayments; and
- Loans made by the SSF.

Note that refunds of contributions (Line 26 on the Detailed Summary Page) must be itemized on Schedule B only if the incoming contribution had to be itemized on Schedule A, as explained earlier in this chapter.

CONTRIBUTIONS TO CANDIDATES

SCHEDULE B — ITEMIZED DISBURSEMENTS — PAGE ___ OF ___

Contributions to Federal Candidates

FOR LINE NUMBER: 28

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): National Organization PAC 000000001

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (mo., day, yr.)	Amount of Each Disbursement This Period
Holiday Plaza Hotel 1100 Burlington Avenue City, State ZIP	Reception for Bill Jones, House candidate, 8th (State) Disbursement for: ___ Primary X General ___ Other (specify)	7/15/94	$879.70 (in-kind)

See page 8 for information on how to determine the value of an in-kind contribution.

Citizens for Stan Smythe 6470 Rushmore Street City, State ZIP	Stan Smythe, House candidate, 11th (State) Disbursement for: ___ Primary X General ___ Other (specify)	7/18/94	$150.00

Itemize contributions to federal candidates regardless of amount.

Taylor for Congress 11 Main Street City, State ZIP	Mavis Taylor, House candidate, 2nd (State) Disbursement for: ___ Primary X General ___ Other (specify)	8/1/94	$500.00

See page 11 for information on making post-election contributions to retire a candidate's debts.

Other Disbursements: $200 Threshold

A disbursement that does not fall under one of the categories listed above (such as a donation to a nonfederal candidate) must be itemized if it exceeds $200 when aggregated with other disbursements made to the same payee during the calendar year.

How to Itemize Disbursements

Categorizing Disbursements

Before beginning to itemize the committee's disbursements, separate them into the different categories listed on the Detailed Summary Page ("Operating Expenditures," "Contributions to Federal Candidates," etc; an illustration of a completed Detailed Summary Page appears on page 37). The disbursements in each category must be itemized on a separate Schedule B designated for that category.

Indicate the type of disbursement itemized on a particular Schedule B by entering the corresponding line number from the Detailed Summary Page in the upper right corner of the schedule. The appropriate category of disbursement may also be written at the top of each page.

Some categories may require several pages. The total for each category should be entered on the bottom line of the last page for that category.

Itemized Information

Itemized disbursement information includes:

- Name of payee;
- Address of payee;
- Purpose of disbursement (a brief but specific description of why the disbursement was made—see Schedule B Instructions and 104.3(b)(3)(i)(B));
- Date of payment; and
- Amount.

104.3(b)(3); 104.9.

Additional Information on Candidates

Further information is required when itemizing a contribution to a candidate committee on Schedule B. Include the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box. 104.3(b)(3)(v). See illustrations above.