



TREASURER'S BEST PRACTICES CHECKLIST

Preparing Qualifying Contribution Documentation

This checklist is intended only as a guide for committees of candidates participating or who intend to participate in the Citizens' Election Program. If you have questions, please call your Candidate Services Liaison at 860-256-2985. Treasurers are further advised to refer to the specific statutory provisions, regulations, declaratory rulings and advisory opinions mentioned in the Participating Candidate Guidebook.

Remember, it's all in the "CARDS"

C:

- **Certification Forms:** Use the *Qualifying Contribution Certification Form* ("QC Cert Form") for all contributions received – it provides useful information as well as protects you the treasurer. It is required for contributions over \$50 and all cash contributions.
- **Clear documents** that are easy to read.
- **Copies only to SEEC (keep originals in your records)**. Remember to copy each contribution check before you deposit it and copy each certification form you receive.
- **Contribution ID Number** is required on each document. If using eCRIS, the system will assign the Contribution ID Number for you.
- **Contractors:** Be sure that the contribution is not prohibited. Review the QC Cert Form for any indication, such as the "Yes" box checked for the question: "Are you a principal of a state contractor or prospective state contractor?"

A:

- **Address** of contributor must be **residential**. Report the address in Section B of SEEC Form 30 as it appears on the QC Cert Form.
 - **No Post Office box addresses or business addresses are permitted.**

R:

- **Reporting:** Information reported in Section B of SEEC Form 30 must match information on the Qualifying Contribution documentation, particularly the QC Cert Form.

D:

- **Documentation** is required for every qualifying contribution.
- **Don't Take Contributions** from:
 - businesses, including trusts;
 - principals of state contractors;
 - children under the age of 12;
 - individuals who are not U. S. citizens or without permanent status (green card holders);
 - lobbyists during the legislative session; or
 - anyone in excess of the \$100 limit.

S:

- **Sequential:** Submit copies of QC documentation with the grant application in sequential order by Contribution ID Number. If copies are paper, **do not staple or scotch tape anything or gather copies into a notebook or binder.**

FREQUENTLY ASKED QUESTIONS ABOUT DOCUMENTING QUALIFYING CONTRIBUTIONS

CASH

Q: What do I do if a contributor gives a cash contribution?

A: The contributor must complete and sign a QC Cert Form with the cash, money order, or bank (cashier's) check, even if the amount is as low as \$5. It cannot, of course, be higher than \$100. The contributor should check off the correct Form of Contribution box (Cash or Money Order) on his or her QC Cert Form.

Q: Do I have to photocopy a cash contribution?

A: No, you do not have to photocopy a cash contribution, but if the contribution is made by money order or cashier's check you should make a photocopy of the money order or cashier's check before you deposit it into the committee checking account, and copy onto the space provided on the bottom of the contributor's QC Cert Form.

CONTRIBUTION ID NUMBERS

Q: What is a Contribution ID Number?

A: Each contribution must have a unique sequential identifying number to tie the information reported for that contribution on the SEEC Form 30 to the documentation provided. The copy of each document relating to a contribution must be marked with that **sequential identifying number** ("Contribution ID Number") **unique to that contribution**.

- The Contribution ID Number on the documentation must match the Contribution ID Number recorded in Section B of SEEC Form 30 itemizing that contribution.
- The first contribution would be Contribution ID Number 001, the second contribution received would be Contribution ID Number 002, and so on.
- Because the Contribution ID Number is unique to each contribution (not contributor or document), if you receive a personal check and a QC Cert Form for a single contribution you would **mark the same ID Number on the two copies related to that contribution**. Alternatively, simply copy the check in the space provided at the bottom of the QC Cert Form.
- If you provide scanned copies of QC documentation, make sure that each scanned image is named with the unique Contribution ID Number.

Q: How do I assign Contribution ID Numbers if I file via eCRIS?

A: When you enter a contribution in Section B of SEEC Form 30, and save the record, **eCRIS will automatically assign the contribution a Contribution ID Number**. Be sure to write the eCRIS assigned Contribution ID Number on *all* documents related to that contribution, such as the copy of the contribution check and the copy of the QC Cert Form.

FREQUENTLY ASKED QUESTIONS ABOUT DOCUMENTING QUALIFYING CONTRIBUTIONS

CONTRIBUTION CERTIFICATIONS

Q: *How should I document qualifying contributions made by credit card online?*

A: Your records should include some proof from the merchant account provider (vendor that processes the contribution) or online contribution site webmaster that each contributor was required to certify that he or she is not a state contractor, etc. prior to being permitted to authorize and submit the credit card transaction.

The documentation for each contribution should include proof of name, address, amount, etc. AND certifications, consisting of either:

- a copy of a print-out with name, address, amount, date, and other required information fields completed by the contributor; OR
- proof of an individual transaction ID, amount, date, name and address of contributor, etc. for each contribution, as provided by the merchant account provider or online contribution site webmaster; AND EITHER
- a copy of the print-out of the completed certification section for each contribution; OR
- a written communication from the merchant account provider or online contribution site webmaster that the site is configured in such a way that **only those contributors who complete the certifications are permitted to give their credit card information and press submit to make contributions.**

Take a look at the SEEC's [sample online contribution site](#) and call your assigned Candidate Services Liaison (860-256-2985) with any questions.

Q: *Can I make a correction on a contributor's QC Cert Form?*

A: Yes, the more information the treasurer can provide, the better. If you obtain additional information after a contribution has been made, you can write a treasurer's note in the margin of a QC Cert Form. Make sure that you initial and date any such treasurer's notes. Do NOT cross out or mark over any of the contributor's original writing on the QC Cert Form. Note that there are some things that a treasurer may **not** change such as the answers to the questions regarding state contractor and lobbyist status. Changes to this information will require the treasurer to obtain a new CQ Cert Form from the contributor. Also, a treasurer may **never** sign a certification form on behalf of a contributor.

For example, if John G. Smith and his son, John G. Smith, who live at the same address, each give contributions, it would be wise for the treasurer to write a note on either or both QC Cert Forms saying that this is a father and son with the same name living at the same address.

FREQUENTLY ASKED QUESTIONS ABOUT DOCUMENTING QUALIFYING CONTRIBUTIONS

CONTRIBUTIONS FROM JOINT CHECKING ACCOUNTS

Q: Sally and Joe have a joint checking account. Joe gave me a \$100 contribution check signed only by him and each of them provided a signed QC Cert Form; I reported \$50 from him and \$50 from Sally. Why did SEEC staff note this as a problem?

A: Since campaign finance law attributes the contribution to the **signer** of the check, and only Joe signed the \$100 check, the entire amount of \$100 is a contribution from him.

The treasurer can either:

- Return the contribution check to Joe without depositing it, asking him AND Sally to sign a joint check for \$100. You can then keep the original QC Cert Forms and copy the new check onto each QC Cert Form, as well as report a \$50 contribution from Joe and a \$50 contribution from Sally in Section B of SEEC Form 30; OR
- Accept the entire contribution from Joe, have him amend and initial and date HIS QC Cert Form to change the amount from \$50 to \$100, and you report a \$100 contribution from Joe in Section B of SEEC Form 30.

As a reminder, the best option with joint checking accounts is to obtain separate checks and QC Cert Forms from each contributor.

REPORTING ADDRESSES

Q: What if the address on the personal check for the contribution differs from the address the contributor wrote on the QC Cert Form?

A: Always report in Section B of SEEC Form 30 the address the contributor wrote on the QC Cert Form.

Q: What address do I report in Section B of SEEC Form 30 if the sole proprietor lives in my district but his shop is located in another district?

A: Report in Section B the sole proprietor's residential address NOT the location of the sole proprietorship shop or office.

Q: What if the address on the personal check or QC Cert Form is only a Post Office Box address?

A: If the QC Cert Form lists a Post Office box address, obtain a new QC Cert Form from that contributor that lists the contributor's residential address (or the treasurer may, after verifying this information, write a note in the margin of the QC Cert Form indicating the residential address and initialing it). If you only have a check copy, ask the contributor to complete and sign a QC Cert Form with his or her residential address.

FREQUENTLY ASKED QUESTIONS ABOUT DOCUMENTING QUALIFYING CONTRIBUTIONS

COPYING QUALIFYING CONTRIBUTION DOCUMENTS FOR GRANT APPLICATION SUBMISSION

Q: If I get 50 contributions made by personal check, each under \$25.00, I know that I have to make a copy of each before depositing them into the campaign account. Can't I just submit those copies to SEEC with my grant application?

A: Campaign finance laws require the treasurer to keep all campaign records, including copies of checks, for four years after the election cycle. Make sure you keep all originals (including original signed QC Cert Forms) and a complete set of copies (QC Cert Form with copy of check at the bottom) for the campaign. **Make an additional copy of all qualifying contribution documentation** for use when applying for a grant. The copies you submit to SEEC must each be marked with a Contribution ID Number, as described above.

Q: Why can't I copy all the personal checks together, separate from the copies of the QC Cert Forms?

A: SEEC strongly recommends that you copy the personal check related to the contribution onto the space provided at the bottom of the QC Cert Form for that contribution.

- If checks are copied separately, you may miss marking the correct Contribution ID Number on the separated QC Cert Form and check.
- The more organized and complete your documentation submission is, the quicker a grant reviewer can work on it, and your likelihood of a timely review increases!
- If absolutely necessary, submit copies of the checks separately, but each check **must** be identified with the applicable Contribution ID Number.

Q: Can I scan qualifying contribution documentation and submit scanned copies via a CD or USB flash drive with my grant application?

A: Absolutely. Make sure that each scanned image is named or marked with the applicable Contribution ID Number, arranged sequentially by Contribution ID Number, and that the CD or flash drive is labeled with the Committee name, treasurer's name and phone number.

Q: Can I email my scanned documentation?

A: As a general rule, no. If you have attachments with a large quantity of data, SEEC may not be able to receive it all due to the size, or due to security features in the State network. Additionally, since other portions of the grant application package cannot be filed electronically (such as Form CEP 15, and the "buffer" check written to Citizens' Election Fund for excess qualifying contributions), it is better to include the scanned documentation on a CD or flash drive delivered at the time of application.

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