

AIM Advocacy Policy

“Be a National Leader on Immunization Policies and Programs”

As a national leader on immunization policy and programs, AIM advocates on behalf of immunization programs, educates policymakers and others about the benefits and purpose of public health immunization programs, and provides programmatic expertise to fellow members, stakeholders and partners. AIM conducts a limited amount of federal legislative advocacy in accordance with federal tax laws and federal grant guidance.

The AIM Strategic Map Outlines the Goals and Objectives of AIM Advocacy:

Maximize AIM’s Visibility and Impact on Key Policy and Funding Issues

- Identify Key Priorities
- Develop and Implement a Plan for Each Priority
- Advocate for Priorities, Goals and Principles
- Identify and Establish Champions to Promote AIM Priorities
- Implement an Outreach and Media Relations Strategy

Process for Identifying Key Priorities

Priorities are identified through a consensus-based approach. Information is gathered from AIM membership via discussion on general membership calls, committee/work group calls, website forums, surveys or e-mail. Information is also gathered from stakeholders and partners, as well as research reports and published articles. Hot topics, challenges, and legislative issues are discussed by the Executive Committee. The Executive Committee agrees on 3-5 advocacy priorities annually.

Definitions and Examples

1. Education: Providing information.
Examples of AIM Educational Activities:
 - Preparation and dissemination of analysis, study or research reports
 - Information provided upon request by a legislative body or committee for technical advice and assistance
 - Fact sheets presenting a balanced, objective exposition of the facts
 - Wide circulation of materials to a diverse and numerous audience on a nonpartisan basis
2. General Advocacy: Taking a position in favor or in opposition of something; making an official statement or speaking on behalf of immunization programs.
Examples of AIM Advocacy Activities:
 - Development and dissemination of position statements,
 - Correspondence expressing views of program managers or impact of policies on immunization programs
3. Legislative Advocacy: Influencing decisions made by officials in the government, including pending legislation at the federal, state or local level, federal regulations,

executive orders, or other administrative action. AIM legislative advocacy, or lobbying, is limited. It is conducted in compliance with tax laws and federal regulations

Examples of AIM Legislative Advocacy Activities:

- Correspondence to legislators or other policymakers requesting action or expressing support or opposition to pending legislation
- Office visits to lawmakers and their staff to express specific action or support for legislation or funding
- Circulation of issue briefs or action alerts requesting action by lawmakers

Compliance with Tax Laws and Regulations

Federal tax laws allow every nonprofit to engage in some lobbying activities. The language in the Internal Revenue Code sets a limit on lobbying activities, providing that “no substantial part of the nonprofit activities may be for carrying on propaganda, or otherwise attempting, to influence legislation.” [26 US Code, Section 501 (c)(3)] Nonprofits may engage in lobbying as long as that activity amounts to only an insubstantial amount of the nonprofit’s activities.

As guidance, IRS Form 5768 sets nonprofit lobbying expenditure ceilings using a sliding scale based on a nonprofit’s annual expenditures. If the amount of the nonprofit expenditures is less than or equal to \$500,000, the lobbying amount should not exceed 20% of expenditures. “Anti-lobbying Restrictions for CDC Grantees,” published in July, 2012, outlines allowable uses of federal funding appropriated by the Centers for Disease Control and Prevention (CDC). CDC appropriated funding may be used for educational activities but may not be used for lobbying activities. In order to assure compliance with federal tax laws and CDC anti-lobbying restrictions, AIM contracts with an independent, certified public accountant to review its time sheets, prepare its annual 990 tax return, and track advocacy activities as a percentage of overall expenditures.

- Employees complete timesheets detailing hourly activities and appropriate funding source
- Timesheets are reviewed and signed by supervisor
- Advocacy activities (including lobbying) are tracked separately and funded by non-federal, unrestricted funds
- Timesheets are reviewed by independent certified public accountant and entered into QuickBooks accounting system
- Federal funds are not used to support lobbying or any advocacy activity
- Federal funding is budgeted and approved by funder to pay portions of overall salary, allowing for personnel time and activities to be funded by other sources