



Colorado
NONPROFIT
Association

Serving nonprofits. Strengthening communities.

Speak for Yourself

Nonprofit Advocacy Toolkit

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Several community foundations from throughout the state are supporting the Colorado Nonprofit Association in its efforts to promote fiscal policies that are good for Colorado’s nonprofits and the people they serve. Those endorsing our public awareness campaign on behalf of the sector include:

- | | |
|--|---------------------------------|
| Community Foundation Serving Boulder County | LMC Community Foundation |
| Community Foundation Serving Greeley and Weld County | Pikes Peak Community Foundation |
| Community Foundation Serving Southwest Colorado | Rose Community Foundation |
| The Denver Foundation | Women’s Foundation of Colorado |
| HealthONE Alliance | |

Note: This handout provides general guidelines only and is intended to serve as an overview. Because the application of law is fact-sensitive and context is critical, this toolkit should not be relied upon as legal advice. Organizations should consult with their attorney to receive guidance on special rules governing their conduct. If your organization has specific questions, a resource list is included on page 13.

Can Charities Lobby?

Yes they can - and they should!

Contrary to popular opinion nonprofits are legally entitled to lobby and advocate for the causes and constituents they represent. The confusion often results because charitable nonprofits (designated as 501(c)(3) organizations) are prohibited from participating in partisan politics – working for a political party or candidate. But it is imperative that nonprofits get involved in the political process as it affects government funding for their programs and policies that impact their ability to carry out their charitable missions.

What Exactly is “Lobbying”

Lobbying is defined by federal tax law as any attempt to influence specific legislation. Lobbying can be done by (1) contacting or urging the public to contact policy makers for the purpose of proposing, supporting, or opposing legislation or (2) by advocating the adoption or rejection of legislation. Regulations divide lobbying into two types, direct and grassroots. Specific rules apply to each type.

Policy Makers refers to anyone who has direct influence over the outcome of a piece of legislation and could include:

- Legislators
- Legislative aides
- Governor
- Lt. Governor
- President
- Others

In the case of a ballot initiative or referendum, voters are considered policy makers, because they decide the outcome of legislation.

Direct lobbying is any attempt to influence legislation through communication with any member or employee of a legislative body, or with any other government official who may participate in the formulation of legislation. There is a three part “test” to determine if a specific activity constitutes direct lobbying:

1. The principal purpose is to influence legislation,
2. There is reference to a specific piece of legislation (even if the legislation is not currently under consideration), and
3. A point of view is expressed.

Asking members of your organization to contact legislators is considered direct lobbying since they are part of the organization and presumably working on its behalf.

Grassroots lobbying is any attempt to influence legislation by affecting the opinion of the general public. In this case the organization encourages the public to lobby. The organization refers to a specific piece of legislation and provides information to the public on how to contact decision makers. Under certain circumstances mass media ads are an example of grassroots lobbying.

What is not Lobbying?

If your organization makes the 501(h) election, you should be aware that many activities do not count as lobbying, including:

1. Distributing materials to members of your organization that discuss legislation but do not urge action by the members.
2. Making available the results of analysis or research on a legislative issue, as long as the facts are presented fully and fairly.
3. Responding to written requests from a legislative body (not an individual legislator).
4. “Self-defense” lobbying on matters that affect the organization's existence, powers and duties, tax-exempt status, or deductibility of contributions.
5. Discussing broad social issues, without mentioning specific legislation.

What are the Financial Limits?

The general rule governing all nonprofits under section 501(c)(3) of the IRS code is that “no substantial part” of their activities may be directed toward influencing legislation. The substantiality rule may be interpreted quite widely and be dependent on the nonprofit's prominence, perceived impact on public opinion and use of unpaid volunteer labor. An organization with a committed cadre of volunteers that successfully lobbies to pass or defeat a bill may be considered to have substantially influenced legislation, even though it did not spend any money.

In 1976, sections 501(h) and 4911 were added to the Internal Revenue Code to set clear definitions of financial limits and acceptable activities and allow public charities to “elect” to be governed by these regulations instead of the broad “substantiality” rule. (Do note that those organizations supported in large part by government grants are subject to different rules discussed later.) The IRS released the final regulations in August 1990. Nonprofits electing to come under sections 501(h) and 4911 may spend the following percentages of their “exempt purposes expenditures”* on lobbying activities:

Budget size*	Total annual expenditures that may be spent on lobbying.
Up to \$500,000	20%
\$500,000 to \$1,000,000	\$100,000 + 15% of budget in excess of \$500,000.
\$1,000,000 to \$1,500,000	\$175,000 + 10% of budget in excess of \$1,000,000.
\$1,500,000 to \$17,000,000	\$225,000 + 5% of budget in excess of \$1,500,000.
Over \$17,000,000	\$1,000,000

*For most organizations, exempt purposes expenditures are the budget. Exempt purpose expenditures do not include tax on unrelated business, expenses associated with unrelated business, capital expenses for new buildings or permanent improvements, expenses for a separate fund raising unit, or the services of a fund raising consultant.

Note that the above amounts are for “direct lobbying.” No more than 25 percent of the permitted amounts may be spent on “grassroots” lobbying. In addition, there is no limit on the amount of lobbying that may be conducted by volunteers who are not reimbursed.

Unless your organization is involved in a substantial amount of lobbying, you are unlikely to even come close to the financial limits. The 501(h) election actually allows for much simpler record keeping -

organizations which lobby under that “insubstantial part test” are required to provide the IRS with a detailed narrative description of their activities.

Even if you do exceed the limits, you are subject to a tax penalty but do not immediately lose your exemption. The excise tax is one quarter of the amount of the excess lobbying expenditures. The IRS uses a four-year averaging period, and only if you exceed the limits by more than 50 percent over the entire period are you in danger of losing your exemption. It is also important to remember that lobbying expenses are counted on a rolling average over four years. See sample below.

4-Year Averaging Period Under Section 501(h)					
(Some organizations that made a section 501(h) election do not have to complete all of the five columns below See the instructions for lines 45 through 50 on page 11 of the instructions)					
Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in) ►	(a) 2003	(b) 2002	(c) 2001	(d) 2000	(e) Total
Lobbying nontaxable					
45 amount	111,077.	105,327.	103,202.	117,447.	437,053.
Lobbying ceiling amount					
46 (150% of line 45(e))					655,580.
47 Total lobbying expenditures	4,210.	12,083.	24,956.	26,250.	67,499.
Grassroots nontaxable					
48 amount	27,769.	26,332.	25,801.	29,362.	109,264.
Grassroots ceiling amount					
49 (150% of line 48(e))					163,896.
Grassroots lobbying					
50 expenditures	4,210.	12,083.			16,293.

Part VI-B Lobbying Activity by Nonelecting Public Charities			
(For reporting only by organizations that did not complete Part VI-A) (See page 12 of the instructions)			
During the year, did the organization attempt to influence national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of	Yes	No	Amount
a Volunteers		X	
b Paid staff or management (Include compensation in expenses reported on lines c through h)		X	
c Media advertisements		X	
d Mailings to members, legislators, or the public,		X	
e Publications, or published or broadcast statements		X	
f Grants to other organizations for lobbying purposes		X	
g Direct contact with legislators, their staffs, government officials, or a legislative body		X	
h Rallies, demonstrations, seminars, conventions, speeches, lectures, or any other means		X	
i Total lobbying expenditures (Add lines c through h)			
If "Yes" to any of the above, also attach a statement giving a detailed description of the lobbying activities			

JSA 361240 2 000 Schedule A (Form 990 or 990-EZ) 2003

Making the 501(h) Election

To make the 501(h) election, file IRS Form 5768 “Election/ Revocation of Election by an Eligible Section 501(c)(3) Organization to make Expenditures To Influence Legislation” and return it to the IRS before the end of your fiscal year. This is a very simple, one-page form that can be downloaded from www.irs.gov/pub/irs-pdf/f5768.pdf and is included in this packet. If, for some reason, you want to cancel the election and return to being governed by the “substantiality” rule, the IRS must be notified before the beginning of your fiscal year (use the same form).

Election/Revocation of Election by an Eligible Section 501(c)(3) Organization To Make Expenditures To Influence Legislation

(Under Section 501(h) of the Internal Revenue Code)

For IRS
Use Only ▶

Name of organization	Employer identification number ⋮
Number and street (or P.O. box no., if mail is not delivered to street address)	Room/suite
City, town or post office, and state	ZIP + 4

1 Election—As an eligible organization, we hereby elect to have the provisions of section 501(h) of the Code, relating to expenditures to influence legislation, apply to our tax year endingand all subsequent tax years until revoked. (Month, day, and year)

Note: *This election must be signed and postmarked within the first taxable year to which it applies.*

2 Revocation—As an eligible organization, we hereby revoke our election to have the provisions of section 501(h) of the Code, relating to expenditures to influence legislation, apply to our tax year ending (Month, day, and year)

Note: *This revocation must be signed and postmarked before the first day of the tax year to which it applies.*

Under penalties of perjury, I declare that I am authorized to make this (check applicable box) election revocation on behalf of the above named organization.

..... (Signature of officer or trustee) (Type or print name and title) (Date)

General Instructions

Section references are to the Internal Revenue Code.

Section 501(c)(3) states that an organization exempt under that section will lose its tax-exempt status and its qualification to receive deductible charitable contributions if a substantial part of its activities are carried on to influence legislation. Section 501(h), however, permits certain eligible 501(c)(3) organizations to elect to make limited expenditures to influence legislation. An organization making the election will, however, be subject to an excise tax under section 4911 if it spends more than the amounts permitted by that section. Also, the organization may lose its exempt status if its lobbying expenditures exceed the permitted amounts by more than 50% over a 4-year period. For any tax year in which an election under section 501(h) is in effect, an electing organization must report the actual and permitted amounts of its lobbying expenditures and grass roots expenditures (as defined in section 4911(c)) on its annual return required under section 6033. See Schedule A (Form 990). Each electing member of an affiliated group must report these amounts for both itself and the affiliated group as a whole.

To make or revoke the election, enter the ending date of the tax year to which the election or revocation applies in item **1** or **2**, as applicable, and sign and date the form in the spaces provided.

Eligible Organizations.—A section 501(c)(3) organization is permitted to make the election if it is not a disqualified organization (see below) and is described in:

1. Section 170(b)(1)(A)(ii) (relating to educational institutions),
2. Section 170(b)(1)(A)(iii) (relating to hospitals and medical research organizations),
3. Section 170(b)(1)(A)(iv) (relating to organizations supporting government schools),
4. Section 170(b)(1)(A)(vi) (relating to organizations publicly supported by charitable contributions),
5. Section 509(a)(2) (relating to organizations publicly supported by admissions, sales, etc.), or
6. Section 509(a)(3) (relating to organizations supporting certain types of public charities other than those section 509(a)(3) organizations that support section 501(c)(4), (5), or (6) organizations).

Disqualified Organizations.—The following types of organizations are not permitted to make the election:

- a. Section 170(b)(1)(A)(i) organizations (relating to churches),

- b. An integrated auxiliary of a church or of a convention or association of churches, or
- c. A member of an affiliated group of organizations if one or more members of such group is described in **a** or **b** of this paragraph.

Affiliated Organizations.—Organizations are members of an affiliated group of organizations only if **(1)** the governing instrument of one such organization requires it to be bound by the decisions of the other organization on legislative issues, or **(2)** the governing board of one such organization includes persons (i) who are specifically designated representatives of another such organization or are members of the governing board, officers, or paid executive staff members of such other organization, and (ii) who, by aggregating their votes, have sufficient voting power to cause or prevent action on legislative issues by the first such organization.

For more details, see section 4911 and section 501(h).

Note: *A private foundation (including a private operating foundation) is not an eligible organization.*

Where To File.—Mail Form 5768 to the Internal Revenue Service Center, Ogden, UT 84201-0027.

Record Keeping

Many organizations are understandably concerned that the rules are complicated and require substantial record keeping. Reporting your organization's lobbying expenditures actually requires very little extra paperwork. The amount of money your organization spends on lobbying each year only needs to be reported in one section of your IRS form 990.

Schedule A (Form 990 or 990-EZ) 2003 84-0942908 Page 5

Part VI-A Lobbying Expenditures by Electing Public Charities (See page 9 of the instructions.)
 (To be completed **ONLY** by an eligible organization that filed Form 5768) **NOT APPLICABLE**

Check **a** if the organization belongs to an affiliated group Check **b** if you checked "a" and "limited control" provisions apply.

Limits on Lobbying Expenditures		(a) Affiliated group totals	(b) To be completed for ALL electing organizations
(The term "expenditures" means amounts paid or incurred)			
36 Total lobbying expenditures to influence public opinion (grassroots lobbying)	36		4,210.
37 Total lobbying expenditures to influence a legislative body (direct lobbying)	37		NONE
38 Total lobbying expenditures (add lines 36 and 37)	38		4,210.
39 Other exempt purpose expenditures	39		569,638.
40 Total exempt purpose expenditures (add lines 38 and 39)	40		573,848.
41 Lobbying nontaxable amount. Enter the amount from the following table -			
If the amount on line 40 is - The lobbying nontaxable amount is -			
Not over \$500,000	20% of the amount on line 40	} 41	111,077.
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000		
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000		
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000		
Over \$17,000,000	\$1,000,000		
42 Grassroots nontaxable amount (enter 25% of line 41)		42	27,769.
43 Subtract line 42 from line 36. Enter -0- if line 42 is more than line 36		43	
44 Subtract line 41 from line 38. Enter -0- if line 41 is more than line 38		44	

Caution: If there is an amount on either line 43 or line 44, you must file Form 4720.

4-Year Averaging Period Under Section 501(h)
 (Some organizations that made a section 501(h) election do not have to complete all of the five columns below
 See the instructions for lines 45 through 50 on page 11 of the instructions)

If anyone in your organization is a registered lobbyist with the Colorado Secretary of State, you also need to report your direct lobbying expenses to the Secretary of State on a monthly basis. See below in the "Registering as a Lobbyist" section for more details.

Registering as a Lobbyist

The Colorado Secretary of State's elections web page, www.sos.state.co.us/pubs/elections/main.htm, provides the following information about who needs to register as a lobbyist: "Professional Lobbyists are registered through the Secretary of State's office. Lobbyists who receive some form of compensation are required to register prior to engaging in lobbying activity.

"Volunteer lobbyists register with the Chief Clerk of the House of Representatives pursuant to Rule 40 of the Rules of the House of Representatives and Rule 36(c) of the Joint Rules of the House and Senate."

To register as a lobbyist in Colorado

From www.sos.state.co.us, click on Elections Center. Go to Lobbyist Information under the Elections Information menu. From this page, you can access lobbyist manuals and directories of registered lobbyists.

To register as a lobbyist, click on "Online Lobbyist System" from the menu at the right. Click "Request

to File Electronically," fill in your information and click Submit. You'll receive an email at the address you specified, confirming your registration and giving you a username and password.

Lobbying Disclosure Reporting

You will need to file a report of your lobbying expenditures every month, even if there were no lobbying expenses for that month. Reports are due by the 15th of the following month; check the Secretary of State's lobbyist calendar for a yearly schedule. To file your lobbyist report online, access the Online Lobbyist System and log in with your username and password. Enter your lobbying expenses for the month, and file your report. In the final step, be sure to click "Submit Report" or it won't be processed!

Funding Lobbying Efforts

Organizations supported wholly or in large part by government grants are subject to the different, more stringent rules of the Office of Management and Budget (OMB) Circular A-122. With three very limited exceptions, nonprofits are not permitted to use federal funds to engage in lobbying activities, although they are permitted to lobby with money from other sources. The three exceptions are:

1. Technical and factual presentations to legislative bodies on topics directly related to the grant. (The legislative body must have requested the information.)
2. Lobbying state legislatures to influence legislation that would help to reduce the cost of carrying out program activities, or to avoid the impairment of the organization's ability to carry out its program activities. (The lobbying must be pragmatic in nature, not ideological.)
3. Lobbying activities specifically authorized in the grant or contract.

Private foundations are not permitted to lobby or earmark grants for lobbying. They can make general purpose grants or even grants for a specific initiative with a lobbying component as long as the initiative's non-lobbying component of the budget is greater than the amount given by private foundations. The IRS recently sent a letter to the Center for Lobbying in the Public Interest that answers many questions about foundations, funding and lobbying. The letter can be found at www.clpi.org/doc_pdf/clpiIRS.pdf.

Community foundations can earmark grants towards lobbying, but they are subject to the same limitations as other 501(c)(3) nonprofits and any money they give specifically for lobbying counts against their financial limit.

The Alliance for Justice, www.allianceforjustice.org, has a new publication, "Investing in Change: A Funder's Guide to Supporting Advocacy" specific rules for foundations to fund nonprofit advocacy efforts.

Nonprofit activities during an election

There are rules governing what charitable nonprofit organizations can and cannot do leading up to and during an election. The most important thing to remember is that a 501(c)(3) nonprofit must remain nonpartisan at all times. An organization may support or challenge a piece of legislation or an issue, but may not support or criticize an elected official or candidate for office. If a particular issue is a hot partisan item and each candidate has a clear and opposing view on the issue, nonprofits should exercise caution in how outspoken they are about that issue so that they do not appear to be supporting one candidate.

Voter and Election Activities All 501(c)(3) Organizations Can Do on a Non-Partisan Basis
Voter registration
Voter education on the process of voting (where to vote, information on elections and election process)
Voting rights and election reform
Get Out the Vote (GOTV)– Encourage and facilitate voting of your community and members Federal funds may not be used for voter registration. You may use any other source of funds for voter registration purposes. Nonprofits may target GOTV activities towards traditionally underserved or underrepresented areas or populations; they may not target populations based on their political or ideological leanings.
Election day activities – Election Monitors, non-partisan GOTV, etc.
Voter education on the candidates and ballot issues
Supporting and opposing ballot questions – These activities are subject to normal lobbying limits. There are no limits on non-partisan voter education on ballot measures that presents both sides of the question. Regular lobbying limits apply if your organization endorses “yes” or “no.”
Publish legislative scorecards – Scorecards must be provided for all officials eligible to vote. Scorecards leading up to an election should be prepared and used in the same manner as in non-election times. It is best to avoid publishing scorecards leading up to an election if your organization has not regularly published them in the past.

Candidate questionnaires – Questions must be nonpartisan and cover a broad range of topics. If a particular topic is a partisan debate topic, such as abortion, gun control, etc., avoid asking questions about that topic. Reprint the exact answers of the candidates, and give equal opportunities to all candidates to answer and publish answers from all candidates.

Candidate forums – All candidates must be invited and equally encouraged to attend. If a majority of candidates cannot attend, Be sure to remain nonpartisan in questions and cover a broad range of topics. If a particular topic is a partisan debate topic, such as abortion, gun control, etc., avoid asking questions about that topic.

Candidate education – Educate all of the candidates equally on public interest issues.

Rent mailing lists and facilities to organizations, legislators, and candidates – Rentals must be made at fair market value and if made available to members of one party, must be available to members of all other parties. It is best to follow rental procedures established independent of election cycles.

Establish a controlled 501(c)(4) organization

Election Activities 501(c)(3) Organizations CANNOT Do

Endorse candidates for public office*

Make any campaign contributions*

Make expenditures on behalf of candidates

Restrict rental of their mailing lists and facilities to certain candidates

Ask candidates to sign pledges on any issue (tacit endorsement)

Increase the amount of incumbent criticism as election time approaches

Publish or communicate anything that explicitly or implicitly favors or opposes a candidate

*While nonprofit organizations cannot participate in or contribute to a candidate’s campaign, volunteers, staff or board members of an organization may do so provided that they are acting as individual citizens, not on behalf of the organization.

Tips for Contacting Legislators

By Mary Kay Hogan, Aponté and Hogan (Colorado Nonprofit Association's lobbyists)

Whether it is a phone call or personal letter, communication from constituents is appreciated and welcomed by legislators. Writing an effective letter or email is not a difficult task. Here are a few guidelines.

Personal Letterhead

Write on personal or business letterhead, if possible, and sign your name over your typed signature.

Return Address

Be sure your exact return address is on the letter, not just the envelope. Envelopes often get discarded. Even though your address is on the letter, be sure to also state that you are a constituent or that you work in the legislator's district, if applicable.

Identify the Subject

Identify your subject matter clearly. State the name and bill number of the legislation you are writing about at the top of the page (e.g. RE: SB 80).

State Reason

State your reasons for writing. Your own personal experience is your best supporting evidence. Explain how the issue would affect you, your business or your profession, or what effect it could have on your community or the state.

NO FORM LETTERS

Avoid stereotyped phrases and sentences that give the appearance of form letters. They tend to identify your message as part of an organized pressure campaign, and are often discarded. Make your own letter, in your own style, incorporating your organization's key message.

Be Reasonable

Don't ask for the impossible, don't threaten, and don't say "I'll never vote for you again unless...".

Be Brief

All of your letters should be one page, one sided. Attachments to support your views are fine. Always say thank you!

Address style

The Honorable _____, Colorado State Senate or House of Representatives
200 E. Colfax Ave.
Denver, CO 80203

Tips for Hosting a Legislative Visit

By Mary Kay Hogan, Aponté and Hogan (Colorado Nonprofit Association's lobbyists)

Personal visits are an extremely effective means of engaging your legislator(s) on issues of interest to your organization. Legislators want to meet and hear from their constituents, and learn about organizations that help their constituents. However, they are very busy people, so it is crucial to make the most of the time you have with your representatives and senators.

The best time to schedule a legislative visit is during the summer and fall, when the legislature is not in session. The Colorado Legislature meets from January through the beginning of May, therefore this is not the optimal time to request a site visit from your legislator.

How to learn who your elected officials are: You can learn who represents you personally or the area where your organization is located by calling your county clerk or visiting www.vote-smart.org.

Before your visit

- Invite your legislator in advance by phone, and follow up with a letter confirming the date and time of the meeting. Expect no more than one hour for a typical site visit.
- Make it easy for your legislator to meet with you. Offer several possibilities and do your best to accommodate their schedule.
- Prepare a good fact sheet about your organization or legislative issue (tips below).
- Learn in advance where your legislator stands on your issue or the mission of your organization.
- Be prepared to explain how your organization affects voters in the legislator's district.
- Dress appropriately for the visit – normal business attire is acceptable.

During the Visit

- Be on time, prepared, and polite.
- Start by concisely introducing your organization. Include the following information:
 - Who you are
 - What your organization does
 - What you need from your legislator
 - A reference to the fact sheet you have prepared
- Don't attack the legislator for his/her record on your issue(s), and don't disparage government or politics.
- Don't use technical terms or acronyms, unless you are certain that your legislator will understand them.
- If you don't know the answer to a question, say you'll find out and get back to him/her – and follow through.
- Before s/he leaves, ask how you can be of help to him/her.
- Thank him/her for his/her time.

After the visit:

Follow up with a thank you note along with any information that you promised during the visit. Keep in touch during legislative session – contact your legislator on issues of interest to your organization, and remind him/her of his/her visit to your facility.

Lobbying and Advocacy Resources

Colorado Nonprofit Association

455 Sherman St., Ste. 207, Denver, CO 80203

(303) 832-5710, (800) 333-6554, Help Desk can be reached at extension 222 or

info@ColoradoNonprofits.org

Colorado Nonprofit Association's Business Member Directory includes contact information for businesses and consultants that work with nonprofit organizations. The Directory can be found at www.ColoradoNonprofits.org.

State of Colorado information

State webpage: www.colorado.gov

Secretary of State: www.sos.state.co.us

General Assembly: www.leg.state.co.us

To find your elected officials

www.congress.org or www.vote-smart.org

IRS Tax Exempt and Government Agencies

www.irs.gov/charities or www.irs.gov/eo (exempt organizations)

Nonprofit Advocacy Resources

Advocacy Institute

1629 K St, NW, #200

Washington, DC 20006

(202) 777-7575

www.advocacy.org

info@advocacy.org

Independent Sector

1200 18th St NW, Ste 200

Washington, DC 20036-2506

(202) 467-6100

info@independentsector.org

www.independentsector.org

Alliance for Justice

11 Dupont Circle, NW, 2nd Floor, Washington,
DC 20036

(202) 822-6070

www.allianceforjustice.org

alliance@afj.org

OMB Watch

1742 Connecticut Ave, NW
Washington, DC 20009

202-234-8494

www.ombwatch.org

Center for Lobbying in the Public Interest

2040 S Street NW, Ste 301

Washington, DC 20009

(202) 387-5048 - Fax (202) 387-5149

charity.lobbying@clpi.org

www.clpi.org