

proposed legislation, grassroots lobbying

Rhattendorf

reported via email

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To: "pdc@pdc.wa.gov" pdc@pdc.wa.gov

To whom it may concern,

Apologies for missing your deadline for public comment, but I just heard about proposed legislation affecting grassroots lobbying.

As an advocacy director of a 501c3, I found the draft legislation confusing. For instance, in the definition of "grass roots lobbying campaign" what is meant by "communication used, directly or indirectly, primarily to influence legislation"? <Section 1, (27) >

Specifically, what is meant by "indirect"? For example, if a group of people concerned about homelessness send out a newsletter highlighting key issues, and explaining how a bill would/would not address them, and included information on how to look up/contact your legislator, or how to testify, would that be indirectly influencing legislation?

How do you differentiate between a grassroots lobbying campaign that indirectly influences legislation and civic engagement?

And if there is no differentiation, is the intent that all substantial communication about a legislative issue be reported to the PDC, weekly? How do you differentiate between journalism and "campaign" communications? Many nonprofits distribute communications on topics of interest to targeted audiences – as does the news media.

Also, at what point does something become a coordinated grassroots campaign? For instance, if an organization sends out an action alert, and others re-share, is the original organization obligated to track where/how their communication is shared and track related labor costs? And then must they track down the names, titles, and contact information of staff at other organizations that shared the alert or other communications?

The draft legislation seems to assume campaigns are orchestrated and led by large lobbying firms. Many small 501c3 nonprofits engage in informal grassroots work and civic engagement campaigns that try to help the public understand and engage in public policy, with the occasional action alert mixed in.

Does the inclusion of an action alert mean all communications on the topic are part of a lobbying campaign?

Depending on what falls under "grassroots lobbying" the legislation, in its current draft form, could create unnecessary confusion about reporting requirements and discourage promotion of civic engagement.

Sincerely,

Ramona Hattendorf | Director of Advocacy | The Arc of King County

Office: 206.829.7048

She/Her/Hers

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