

National Federation of State Humanities Councils

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December 12, 1983

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Financial Management Division
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Washington, DC 29593

Dear Mr. Lordan:

As President of the National Federation of State Humanities Councils, I am writing to urge that the recently proposed revisions in lobbying regulations for nonprofit organizations be withdrawn. In this we support the position of Independent Sector, of which we are a member organization.

There are three points in the recently proposed revision of Circular A-122 that concern us. They are:

1. "Legislative Liaison" activities would be defined as lobbying, and thus costs associated with them would not be allowable. Our experience has been that such activities enhance our ability to provide information to our members. Only a small portion of this information is directly connected with pending legislation.
2. Distributing the results of non-partisan studies of pending legislation is not clearly stated to be allowable. We receive such studies from other organizations and distribute others ourselves. Again, our purpose is most often informational, and it is important to assure that such activities are defined clearly as allowable.
3. The use of Federal funds for lobbying is already illegal. Our organization and budgets are designed and managed to assure conformity to the existing law. To our knowledge, no instances have been cited of illegal use of Federal funds. Thus, we are concerned that the regulations are being changed without due cause, when all that might be required are more carefully designed accounting procedures.

We encourage you to give this matter further consideration before the revisions are enacted.

Sincerely,

Walter Capps
Federation President

cc: Independent Sector
Chairs, State Humanities Councils