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Advising Non-Profit Grassroots Advocacy Organizations

Small non-profit grassroots advocacy organizations face a variety of legal and compliance issues. This article discusses practical steps to assist attorneys in effectively advising these organizations.

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Contributors



Susan J. Zachman

Co-Director of the Democracy Capacity Project and Partner at Zachman & Connolly, PLLC



Jon Connolly

Co-Director of the Democracy Capacity Project and Partner at Zachman & Connolly, PLLC

Politics in the US has become increasingly partisan and divided in recent years, and public charity and social welfare non-profit organizations are increasingly getting involved in political advocacy. Many established non-profit organizations that historically focused on direct service to their constituents have concluded that to fulfill their missions they need to embrace an advocacy role. Other non-profit organizations that arose in the wake of the 2016 election and subsequent racial justice movements specifically embrace advocacy and civic engagement as core to their missions. In both cases, non-profit organizations that govern their activities and to shore up their ability to manage the governance, finance, and employment risks arising from their day-to-day operations.

This article discusses how counsel can help these organizations meet two of the main challenges they face:

- Navigating the overlapping obligations arising from federal and state regulations, which are often complex and confusing, in light of the paucity of available helpful resources.
- Ensuring that the organizations have the infrastructure and operational capacity to comply with advocacy-related regulations.

Attorneys that do not practice political law as a core practice can (and do) give invaluable advice to smaller grassroots advocacy organizations (GAOs), a term used in this article to describe groups of activists who rally members of a community to vote or advocate for change in state or federal laws and regulations. Attorneys can be especially helpful to organizations just beginning to do advocacy, regardless of whether the organization is newly formed or already well-established. Organizations benefit when their counsel can help them spot issues, find appropriate informational resources, and use the information to help understand how various regulatory regimes apply to their activities.

This article does not provide all the answers needed to advise a smaller non-profit client. Instead, it is intended to act as an outline of the kinds of issues these clients face, suggest where to look for resources related to those issues, and set forth some practical steps attorneys can take to help these clients strengthen their infrastructure and appropriately design their advocacy programs to manage (and, when appropriate, minimize) regulatory compliance burdens.

Giving Advocacy-Related Legal and Compliance Advice

Non-profits participating in civic engagement and advocacy activities for the first time face multiple complicated and confusing regulatory regimes. For example, although federal and state laws have very different goals and points of focus, these organizations have obligations under both.

Federal law primarily governs non-profit organizations through tax law. Many non-profit organizations have been granted tax-exempt status by the Internal Revenue Service (IRS)

under either Internal Revenue Code (IRC) § 501(c)(3) (501(c)(3) organizations) or § 501(c)(4) (501(c)(4) organizations). Federal law limits how much lobbying a 501(c)(3) organization can do, and if it exceeds IRS limits, it risks losing its tax-exempt status. 501(c)(3) organizations are also prohibited from engaging in activities that support or oppose candidates for office (electioneering). By contrast, 501(c)(4) organizations are not subject to any restrictions on their lobbying activity. However, they must ensure that most of their work is for their primary social welfare purpose and not for the purpose of electioneering. (See <u>Bolder Advocacy: The</u> <u>Connection: Strategies for Creating and Operating 501(c)(3)s, 501(c)(4)s, and Political</u> <u>Organizations</u>; for more information, see <u>Applying for Federal Tax Exemption Under Section</u> <u>501(c)(3)</u> on Practical Law.)

State laws impose an entirely different set of restrictions and obligations, regulating voter registration activity, voter assistance programs, lobbying activities, and advocacy for ballot measures (which most states regulate under their campaign finance laws). Counsel should also be mindful of obligations imposed by local laws (whether municipal or otherwise). In this article, "state" is used to mean both "state and local."

These state regulatory regimes generally lack much publicly available practical guidance, and smaller or less experienced advocacy groups are sometimes unaware that these activities are regulated. Moreover, few attorneys specialize in these state laws. General legal practitioners advising a non-profit organization on other day-to-day matters are often in the best position to help the client find its way to the advocacy resources it needs.

Because freely available practical guidance for GAOs about how to comply with the various applicable regulations is still fairly limited, attorneys can have the most immediate and meaningful impact by connecting clients with those resources that do exist, and then helping them assess their advocacy goals in light of the challenges and limitations imposed by applicable laws and regulations.

Steps counsel can take include:

• Identifying any regulated advocacy work the organization is doing and determining the relevant regulatory regimes.

- Identifying and accessing relevant advocacy regulations resources.
- Helping the organization understand how the regulations apply to its advocacy goals.

Identify Regulated Advocacy Activities

GAOs may hope to pursue a range of activities, and they would often benefit from an attorney's assistance in identifying which activities are regulated or impose compliance obligations. For example, many GAOs aspire to programming that implicates lobbying laws, voter assistance rules, and campaign finance regulations. Reviewing an organization's planned programming before it starts these activities can help identify where it will need to take steps to ensure compliance and help focus the organization's strategic attention on any missing operational resources, such as financial controls or reporting capacity (see *Giving Day-to-Day Legal and Compliance Advice* below).

Lobbying and Other Advocacy

GAOs may intend to engage in a variety of advocacy activities, but whether those activities would be considered lobbying depends on the jurisdiction and the regulatory regime. 501(c)(3) organizations need to ensure that they are appropriately limiting their lobbying activity under federal tax law, but often it may not be clear to inexperienced groups which activities must be assessed against the IRS limits on "lobbying" by 501(c)(3) organizations, which activities must be tracked against state lobbyist registration requirement thresholds, and which count in both categories. For example, while the IRS does not consider advocating before executive branch agency officials to be lobbying, many states do.

Similarly, state rules about what activities count as lobbying vary widely from state to state. For example, some states regulate grassroots lobbying (that is, calling on the public, or other organizations, to take action to influence legislation) and may require individuals or organizations who make these communications to register as lobbyists.

Counsel should thoroughly examine a client's advocacy program plans and flag activities that may require limits on the amount of lobbying, lobbyist registration, or other compliance

obligations. To help a client organization identify which compliance regimes apply to any planned advocacy activities, counsel must examine:

- Which level of government is the object of the client's advocacy (federal, state, or local).
- Whether the advocacy counts as a regulated activity under the applicable federal or state lobbying laws.
- Whether the client's activities implicate state or local gift rules, which could arise, for example, when giving even a small "swag" gift to public officials.

Attorneys advising a 501(c)(3) organization should confirm whether it has considered the two available methods of assessing (c)(3) lobbying limits under IRS rules (the "insubstantial part" method or the "IRC § 501(h) election" method) and chosen the appropriate one for the organization (see **Bolder Advocacy: Public Charities Can Lobby: Guidelines for 501(c)(3) Public Charities** and **Maximize Your Lobbying Limit: Elect to Measure Your Lobbying Using the 501(h) Expenditure Test**).

The Democracy Capacity Project is creating a 50-state series of Practical Guides that cover state lobbying regulations, with practical tips for designing compliant advocacy programming and minimizing a non-profit organization's administrative burdens while staying compliant with applicable laws (see <u>The Democracy Capacity Project: Practical Guidance: What Non-Profits Need to Know About Lobbying</u>).

Get Out The Vote Activities

Many GAOs are interested in conducting voter registration and get out the vote (GOTV) activities for their constituencies. Much like lobbying, registration and GOTV activities are subject to a variety of regulatory requirements. Federal law determines what activities would be considered partisan, which would make them impermissible for 501(c)(3) organizations. 501(c)(4) organizations also need to look to federal law to determine whether this programming would fit within their primary purpose or their secondary purpose limitations. Substantive rules about voter registration and GOTV activities, however, are set by state law, and the rules and regulations differ markedly between jurisdictions and change frequently.

Counsel should assess their client's activities against the relevant jurisdiction's current rules regarding:

- Third-party involvement in voter registration drives (some states have specific requirements, such as mandatory trainings, use of specific forms and procedures, and strict time limits for submitting the completed registration forms).
- Third-party assistance with absentee ballots or voting by mail (many states restrict whether and how third-party organizations can provide assistance).
- Third-party postage assistance (in some states, giving a voter a stamp to submit an absentee ballot request or return a completed ballot may be impermissible).
- Aiding voters in line for polls (for example, Georgia recently passed a law prohibiting third parties from offering anything to voters waiting in line to vote, even water).

(For more on the regulations applicable to election-related activities, see **Bolder Advocacy**: **The Rules of the Game: A Guide to Election-Related Activities for 501(c)(3) Organizations**.)

The Fair Elections Center website has an excellent collection of concise, practical <u>Voter</u> <u>Registration Drive Guides</u> for all 50 states and the District of Columbia, as well as some state materials on voter assistance with absentee ballots and other voting process-related regulations.

The Democracy Capacity Project is creating a 50-state series of Practical Guides to empower non-profits to design and run civic engagement, democracy support, and GOTV programs that are bold and effective, while also maintaining compliance with often technical and confusing state laws and regulations governing these activities (see <u>The Democracy Capacity Project:</u> <u>Practical Guidance: Non-Profit Voter Assistance</u>).

Ballot Measure Advocacy

Many states have an initiative mechanism for citizens to put proposed legislation or state constitutional amendments on the ballot, or empower the legislature to put similar measures before the public for ratification. While the IRS considers supporting or opposing a ballot measure to be lobbying, most states regulate this kind of advocacy under their campaign finance regimes. Campaign finance regulations are complicated and often require detailed financial reporting on short timetables. When a client's plans involve advocacy for or against a ballot measure, counsel should help them seek additional experienced guidance to investigate whether they are prepared to meet any applicable campaign finance registration and reporting obligations with the state, and any potential disclosure requirements for ballot measure advocacy communications.

Education About Candidates Running for Office and Support of or Opposition to Candidates

GAOs may sometimes wish to hold candidate forums, communicate with their constituents about candidates, or even take an official position in support of or opposition to candidates. All activities of this type implicate federal and state regulation. At the federal level, the IRS prohibits 501(c)(3) organizations from any electioneering activity in support of or opposition to a candidate for office, but it does allow certain educational activities (for example, candidate forums where all candidates are invited).

Federal law gives 501(c)(4) organizations more leeway to support or oppose candidates, but they still must ensure that most of their work is spent on their primary purpose, which generally means that the organization must use at least half of its time and money to pursue activities that could be done by 501(c)(3) organizations with the same mission, and must also ensure that any electioneering uses less than half of its resources. Educating voters about candidates may also implicate state campaign finance regulations.

Counsel for organizations that are contemplating candidate-related activities should carefully examine the narrow area of permitted activities for 501(c)(3) organizations, and how state campaign finance regimes or the federal primary purpose rule may limit a 501(c)(4) organization's more explicit election-related activity.

Identify and Access Relevant Advocacy Regulations Resources

While the IRS, and most relevant state agencies, make at least some information about the relevant advocacy-related regulations available on their websites, the information provided by

these agencies is often difficult to find and to interpret. Bolder Advocacy, a program of the Alliance for Justice, maintains a Resource Library page with free resources on advocacy designed to be useful for both non-profit organizations and attorneys who are not political law practitioners. Bolder Advocacy also runs a free technical assistance hotline, where its staff can answer questions, help guide counsel to the relevant resources, or (if needed) assist with referrals to experienced local political law counsel.

Help Clients Understand How Regulations Apply to Advocacy Goals

Once an attorney for a GAO has identified the applicable regulations and located any relevant resources, they should help their client understand how the regulations apply in practice. Helping a client explore alternative paths to its desired outcome can have a significant impact, and sometimes a simple modification to a client's planned programming can help avoid more onerous registration and reporting requirements. For example, some state lobbyist registration requirements are triggered by the amount of time an individual paid staff person spends lobbying (as defined in the particular state statute) on behalf of the non-profit during a particular reporting period. In those states, it may be easy to divide lobbying work between different individuals so that no single staffer is required to register as a lobbyist.

Giving Day-To-Day Legal and Compliance Advice

GAOs often start spontaneously from a specific community in reaction to an event or a challenge, and may operate for a time without a formal entity structure (for example, as unincorporated associations). They are often led by advocates with experience as student activists, community leaders, or campaign workers, but who lack experience managing the operational and financial requirements of a legal entity in a regulated environment. Once an emergent group decides to form a legal entity, time pressures or limited financial resources may lead the organization to try to do the entity formation work itself, or to rely on informal or short-term legal assistance with no follow-up counseling. (For information on finding the appropriate entity structure for non-profits, see <u>Choosing a Charitable Non-Profit Entity Type</u> <u>Chart</u> on Practical Law.)

Because of these challenges, smaller organizations may contact counsel seeking advice on a specific question, but they may actually need help organizing, assessing, and improving on https://www.reuters.com/practical-law-the-journal/legalindustry/advising-non-profit-grassroots-advocacy-organizations-2023-06-01/

their existing day-to-day systems, such as those controlling corporate governance, finance, employment matters, insurance, and data protection. Counsel can provide a great deal of value by helping the organization identify these kinds of issues. Given the ever-present resource constraints facing smaller non-profit organizations, they generally cannot tackle all their needs at once. As opportunities present themselves in the context of other work, however, or if *pro bono* resources or a capacity-building support grant become available, counsel should consider the practical steps needed to strengthen the day-to-day capabilities of the organization by addressing:

- Governance practices and controls, including:
 - gathering and assessing formation, governance, and tax status documents, including internal governance policies and any tax exemption letter from the IRS; and
 - ensuring unincorporated associations understand their status and risk.
- Financial policies, practices, and controls, including assessing:
 - financial policies, controls, and reporting capacity; and
 - grant acceptance and tracking systems.
- Employment policies, practices, and controls, including assessing policies and practices for:
 - employees;
 - independent contractors; and
 - volunteers.
- Risk management policies, practices, and controls, including assessing:
 - insurance coverage; and
 - data privacy and security policies and systems.
- Opportunities to leverage counsel's contacts by connecting the organization to other providers and supporters.

Governance Practices and Controls

Gather and Assess Formation, Governance, and Tax Status Documents

Many early-stage GAOs may not have carefully organized and maintained their original formation, governance, and tax status documents and may need assistance to locate, collect, and organize them. The collection process can provide a good opportunity to reconcile existing documentation with their current practices, and identify areas for improvement. If a client does not already have a cloud storage account in the organization's name (not in the name of an employee or a board member) that it can use to create a secure folder to store core organizational documents, the organization should create one at the first viable opportunity. Once these documents are collected, counsel should help the organization create an index with notes on the folder's contents, as well as a reporting calendar, contact information for the relevant state agencies, and any corporate, charitable solicitation, and taxpayer identification numbers.

The folder should include:

- Original formation and basic governance documents, including (assuming the organization has incorporated as a non-profit corporation):
 - the original certificate of incorporation (or articles of incorporation, as they are called in some states);
 - any amendments to the formation document;
 - the current bylaws;
 - a current list of the directors and officers;
 - recent corporate filings made with the state;
 - any governance policies the organization has in place (such as a conflicts of interest policy, whistleblower policy, or document retention policy);
 - board materials, including minutes of board meetings; and
 - documents relating to the organization's charitable solicitation registrations, if any.
- Tax status documents, including:
 - the organization's employer identification number (EIN) paperwork (or the EIN, if the original paperwork is not available);
 - the original tax exemption application filed with the IRS and any follow-up correspondence;

- the tax exemption letter from the IRS; and
- Form 990 tax returns with clearly marked redacted (public) and unredacted (confidential client) copies.

If needed, counsel can download the organization's tax exemption letter (and its recent Form 990 filings) from the IRS website (see **IRS: Tax Exempt Organization Search**). The IRS is currently experiencing a backlog, so some recent tax filings may not appear on the site even if the client timely submitted its Form 990.

Once the documents are gathered, counsel should confirm that the organization:

- Uses its full, correct legal name and its correct date of incorporation where required (for example, on its Form 990 tax returns).
- Has received:
 - confirmation of its IRS tax-exempt status (acknowledgement of tax-exempt status is sometimes delayed); and
 - the appropriate exemption letter. (From time to time, the IRS erroneously sends an acknowledgement of 501(c)(3) private foundation status instead of 501(c)(3) public charity status. The organization must correct this kind of error to avoid inappropriate restrictions on its activities.)
- Reviews its current formation, governance, and policy documents to confirm they do not contain clauses that conflict with current organizational practice or with the requirements of state law in the state of incorporation.
- Is in good standing with its state of incorporation. Counsel generally can confirm the
 organization's status (without incurring the cost of requesting a certificate of good
 standing) by checking the information available online in the relevant state corporations
 database, which usually can be located by searching the name of the state along with
 "corporate search."
- Has current and correct information on file with the state regarding its directors and officers, mailing address, and registered agent.

- Has proper separation between itself and any sister organizations. Many GAOs operating as 501(c)(3) organizations eventually form a sister 501(c)(4) organization that may support or oppose candidates and is not limited in how much lobbying it may do. Counsel should confirm that the client has used the correct legal name of each of the two entities on important documents and has appropriately separated the governance functions of the entities (for example, by having two separate sets of bylaws, and a separate board of directors for each) and maintains a separate public presence for each (for example, different websites and social medial presences).
- Has properly filed any required state charitable solicitation registrations. Many GAOs may have difficulty managing multiple state charitable solicitation registrations. Counsel should help minimize the number of states in which the organization is obligated to register, consistent with legal requirements, and coordinate with the organization's accountant or bookkeeper on its financial reporting capabilities. For example, obtaining a charitable solicitation registration in a state that requires independently audited GAAP financial statements is often not a viable alternative for a small organization if the organization cannot afford the fees required for an independent audit, which can range from \$15,000 to \$25,000. (For information on state-specific charitable solicitation requirements, see <u>Non-Profit Corporation Law: State Q&A Tool: Question 10</u> on Practical Law.)

(For resources to assist in forming, operating, and dissolving a non-profit organization, see **Non-Profit Toolkit** on Practical Law; for a publicly available repository of governance resources appropriate for smaller non-profit organizations, see **Stanford Law School: Mills Legal Clinic: Organizations and Transactions Clinic: Documents**.)

Ensure Unincorporated Associations Understand Status and Risk

Some GAOs may be operating as unincorporated associations. Counsel should advise these organizations about the benefits and risks under their state's law of remaining an unincorporated associations, as opposed to incorporating as a legal entity or entering into a

relationship with a fiscal sponsor, in light of the client's current (and anticipated) activities and fundraising needs. An unincorporated association can often open a bank account in its name if it obtains an EIN from the IRS (usually by using the community or volunteer group designation).

However, many states do not provide limited liability for directors, officers, or members of an unincorporated group or any other similar legal benefits that legal entities enjoy. Even in states that do offer some limited liability protections, the unincorporated association law is typically much less developed than non-profit corporation law and therefore can be more difficult to interpret and less reliable.

Counsel should not push an organization to incorporate prematurely but should also make sure the organization understands the risks of its current status. Counsel for a group that decides to remain an unincorporated association should confirm that the client has a set of basic internal bylaws (or other organizing document) memorializing the group's decisionmaking processes and what happens if the group disbands. Counsel should also check whether applicable state statutes require unincorporated associations to register or report to the state to receive the benefit of any limited liability protections that exist. For example, some states require these organizations to file a "doing business as" (or assumed name) certificate.

(For more on selecting the appropriate legal entity type, see <u>Choosing a Charitable Non-Profit</u> <u>Entity Type Chart</u> on Practical Law; for a model fiscal sponsorship agreement that a 501(c)(3) organization can use to sponsor the work of another entity or individual that furthers its nonprofit mission, with explanatory notes and drafting and negotiating tips, see <u>Comprehensive</u> <u>Fiscal Sponsorship Agreement</u> on Practical Law.)

Financial Practices and Controls

Gauge Financial Controls and Financial Reporting Capacity

Reasonably sophisticated financial controls and financial reporting capacity are basic requirements for regulated advocacy, but reporting requirements can be challenging for smaller or newer GAOs. The IRS requires non-profits to track staff time spent on lobbying activities, so that the cost of their lobbying activities can be reported annually on Form 990. Most state lobbyist regulations also require registered lobbyists to track expenditures. Some jurisdictions have particularly onerous reporting requirements. For example, in Wisconsin, the periodic reports required from registered lobbyists must include an account of individual staff members' daily lobbying activity. In the District of Columbia, lobbying reports must include a log of all communications between a registered lobbyist and a public official, including every individual phone call or email.

If the organization engages in activities that are regulated under campaign finance rules, it may need to report incoming and outgoing funds as often as every 48 hours. In assessing the various day-to-day operational processes and systems, counsel should communicate with the client's bookkeeper, accountant, or operational staff to confirm that the financial controls and reporting systems are capable of supporting the client's advocacy goals, and help upgrade their capabilities as needed. Strong financial controls over the organization's day-to-day activities also help leaders better manage staff, track grant utilization, produce informative reporting, and improve the overall strategic impact of the organization.

Assess Grant Acceptance and Tracking Systems

Most organizations need a sufficiently sophisticated system to track the use of granted funds. Although many funders give general operating grants, which require less detailed expense tracking, almost all grants require the organization to spend the funds within a particular time frame, and institutional grantors typically require a report on outcomes and impact. (For more on advocacy grants, see **Bolder Advocacy: What to Know About Advocacy Grants**, **Investing in Change: A Funder's Guide to Supporting Advocacy**, and **Foundation Advocacy Grants: What Grantees Need to Know**.)

Counsel should help assess the client's time and expense tracking systems to make sure that they are aligned with the contractual requirements of the client's grants. Counsel should be unafraid (and should help the organization be unafraid) to negotiate the terms of the grant contract to fit the capabilities of the client, or to remove or modify inapplicable boilerplate provisions. Just as smaller GAOs are often working on their compliance capacity, funders of GAOs are often still learning how to grant funds to smaller organizations effectively. These funders may propose contracts that contain boilerplate provisions that are inappropriate or unworkable for a GAO — they often will adapt the contracts but only after the GAO asks.

Employment Practices and Controls

Assess Employment, Independent Contractor, and Volunteer Practices

GAOs often start with unpaid volunteers, then move to contractor-only staffing, and ultimately hire employees. Wherever a client is in this life cycle, counsel should assess the organization's employment, independent contractor, and volunteer practices.

Counsel should ensure that the organization accurately tracks staff time, both to enable compliance with federal and state lobbying reporting requirements (and federal, state, and local employment laws) and to help with internal assessment of staff goals.

Certain activities, such as door-to-door canvassing, can present employment compliance challenges for GAOs, because canvassers may not qualify as independent contractors, but the organization may be unprepared to manage large numbers of seasonal or temporary employees. Counsel can help the organization consider the costs and benefits of engaging a third-party independent contractor to supply canvassing services or using volunteer canvassers instead.

Counsel can also help clients consider fiscal sponsorship (especially for an organization that has not yet formed an entity or made its first hire) or a professional employment organization (PEO), which can handle payroll and employee benefits, including health insurance.

(For more on employment and volunteer practices for non-profits, see <u>Employment Law Issues</u> <u>for Non-Profits: Overview</u> and <u>Non-Profit Use of Volunteers: Best Practices for Risk</u> <u>Management</u> on Practical Law.)

Risk Management Practices and Controls

Assess Insurance Coverage

Counsel should help smaller organizations confirm that they have appropriate director and officer and liability insurance coverages (for example, property, casualty, or the use of motor vehicles), as well as employment-related insurance coverages, such as workers compensation and any state mandated paid sick leave or disability policies.

Assess Data Collection, Sharing, and Protection Systems

A GAO's most important asset is often data, especially the names, mailing addresses, email addresses, and phone numbers of the organization's constituents. Many groups begin by storing their data on simple systems, such as consumer-focused free cloud-based platforms, and digital accounts may be in the name of employees or board members, instead of in the organization's name. These insecure platforms are vulnerable to disruption by a disgruntled employee or a ransomware hacker. Counsel should help the client prepare both a high-level policy to guide the organization's strategy as well as a concrete, actionable plan to protect the organization's data from accidental or malicious loss, and then help the organization implement that plan. There are several reasonably priced backup system vendors that can help protect and secure an organization's cloud-stored data (including emails).

GAOs also should be thoughtful about whether and how they share data with other organizations. Any data sharing should comply with the organization's own privacy policies. A 501(c)(3) organization should be especially careful about sharing data, because sharing data with organizations that will engage in partisan activity could be deemed impermissible partisan activity on the part of the 501(c)(3) organization. A simple privacy policy and disclaimer on a GAO's website can be valuable evidence that the organization does not intend to permit data use that violates IRS electioneering restrictions.

(For a model policy for use by a non-profit organization relating to the collection, storage, use, and disclosure of personal information, including for fundraising campaigns, with explanatory notes and drafting tips, see <u>Donor Privacy Policy</u> on Practical Law; for a model document retention policy, with explanatory notes and drafting tips, see <u>Records Retention and</u> <u>Destruction Policy (Non-Profits)</u> on Practical Law; for more information, see <u>Bolder Advocacy:</u> <u>Influencing Public Policy in the Digital Age: The Law of Online Lobbying and Election-Related Activities</u>.)

Leveraging Counsel's Connections

Counsel for GAO clients are likely in a good position to connect the organization to other providers, especially bookkeepers, accountants, and financial consulting professionals well versed in serving smaller non-profit organizations. Counsel may also be able to connect the client to potential funders (either individuals or grantmakers), collaboration partners, or board members.

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