

September 8, 2016

California Fair Political Practices Commission
428 J Street, 620
Sacramento, CA 95814
Via Email: pracomment@fppc.ca.gov

Re: Political Reform Act Revision Project

To whom it may concern:

Alliance for Justice (AFJ) appreciates that the California Fair Political Practices Commission (FPPC), in partnership with California Forward and the law schools at the University of California at Berkeley and the University of California at Davis, is reviewing and revising the Political Reform Act (PRA) to modernize California's landmark ethics law. With a shared belief that the law should be accessible, AFJ lauds the goals of the project to improve clarity and understanding and ultimately promote compliance with the law. As described below, we ask that you extend the first comment period to give more time for groups to provide thoughtful comments.

Alliance for Justice is a national association of over 100 organizations, representing a broad array of groups committed to progressive values and the creation of an equitable, just, and free society. We believe that all Americans have the right to secure justice in the courts and to have their voices heard when government makes decisions that affect their lives. We promote active engagement in democratic processes and institutions by giving nonprofits the confidence to advocate effectively and by protecting their right to do so. Through our two California offices, we work with hundreds of California nonprofits every year who are regulated by the PRA, because they advocate before state government or support or oppose ballot measures in the state. In our over 12 years of experience in California, we've found that the complexity of the PRA often dissuades nonprofits from bringing their expertise to bear on important policy issues, especially when they are faced with the choice of navigating the rules on their own or having to hire costly professionals to assist them. Through workshops, webinars, and technical assistance, we attempt to make compliance easier, but many still find the task daunting, in part because of a lack of clarity in the law.

The FPPC and its partners have noted that all interested members of the public have the opportunity this year during two public comment periods to review and comment on the identified issues with the law and make recommendations for improvement. As currently proposed, the Round #1 comment period is between August 3rd and September 30th, 2016, and the Round #2 comment period is between November 7th and December 2nd, 2016. Fortunately the FPPC and its partners have indicated these dates are subject to change.

To ensure robust input, **we request that the Round #1 comment period be extended until the end of the calendar year.** This will give organizations sufficient time to review and offer recommendations on this important project. For nonprofits doing the vital work of engaging groups underrepresented at the polls, the time and resources needed through this year's election may make it difficult for them to review and comment during the proposed Round #1 comment period. In 2016 particularly, a longer comment period would give more time to organizations that are involved in some of the many ballot measure campaigns. Extending the comment period would be especially helpful for the thousands of nonprofits in the state who are already stretched thin, directly serving their communities. Often, such organizations do not have full-time lobbyists, so employees will need to manage a large-scale PRA review and comment process, in addition to their existing organizational responsibilities.

While there is a Round #2 comment period proposed, FPPC and its partners have indicated that only comments received by September 16th, 2016 will be considered for inclusion in the second draft revision. We therefore also request that all comments received during our proposed Round #1 comment period be considered for inclusion in the second draft revision, and that the second comment period take place in February and March.

Thank you for the opportunity to comment, and for your time and consideration to this important project. Please reach out should you have any further questions.

Sincerely,

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