



SUMMARY: Timeline of the Advocacy Policy

July 2023

For a detailed timeline including minutes, please see the EXTENDED Timeline.

March 2021: In Continuing Sessions PYM approved a new corporate witness – Addressing Climate Change. As a corporate witness all Friends, households, meetings and PYM itself are asked to come under the weight of how they can respond to the climate catastrophe.

Spring and Summer 2021: Energized by the corporate witness, some groups within PYM increased their communications to PYM Friends and meetings. As they heard the call to address climate change, they wanted PYM’s corporate witness as actively encouraging Friends to lobby – they wanted Friends to urge lawmakers to vote in specific ways on specific legislation.

Summer and Fall 2021: PYM clerks and PYM staff began setting guidelines around the content of PYM communications related to particular political views and to the promotion of lobbying (as defined by the IRS: asking a lawmaker to vote in a specific way on specific legislation or asking others to ask lawmakers to do the same). Clerks and staff found resistance to the idea of PYM guidelines. Friends were not in unity on what guidelines might look like or what approach PYM might take to developing them.

Fall 2021: Staff, presiding co-clerks and co-clerks of Eco-Justice Collaborative (EJC) began meeting regularly to discuss the issues as they applied to EJC communications and newsletters. Admin Council and staff drafted a policy on public expression of witness and began to wrestle with its limitations and ambiguities. Staff spoke with staff at FCNL and shared resources, policies, and information. Staff spoke with PYM’s nonprofit attorney who was surprised PYM did not already have an advocacy policy. Such policies are common. Our attorney and other nonprofit executives recommended PYM create an advocacy policy to provide overall guidance and direction to staff and volunteers.

Winter 2021-2022: Administrative Council and staff invited collaboratives and Friends to share their views and needs. A draft of a policy on advocacy and lobbying was reviewed with collaboratives. The accompanying/background materials were updated in response. Admin Council approved the policy.

Winter and Spring 2022: PYM Administrative Council Clerk and staff published information about the policy including background information and multiple examples of its impact. They held events on zoom to explain the policy and responded to questions. The posted information was updated to include a video of the explanation and responses to the questions asked at the events.

Summer 2022: A short overview of the policy was shared at Annual Sessions and Friends were directed to ask questions of the General Secretary. Two people followed up and the General Secretary met with them.

Spring and Summer 2023: A quarterly meeting and a monthly meeting minuted their concern and questions about the policy.

Extended Timeline of the Advocacy Policy

March 2021

In Continuing Sessions PYM approved a new corporate witness – Addressing Climate Change. As a corporate witness all Friends, households, meetings, and PYM itself are asked to come under the weight of how they can respond to climate catastrophe.

Spring and Summer 2021

Energized by the corporate witness, some groups within PYM increased their communications to PYM Friends and meetings. As they heard the call to address climate change, they wanted PYM’s corporate witness to actively encourage Friends to lobby – they wanted Friends to urge lawmakers to vote in specific ways on specific legislation.

Summer 2021

PYM staff and PYM clerks began setting guidelines around the content of PYM communications related to particular political views and to the promotion of lobbying (as defined by the IRS: asking a lawmaker to vote in a specific way on specific legislation or asking others to ask lawmakers to do the same). Clerks and staff found resistance to the idea of PYM guidelines. Friends were not in unity on what guidelines might look like or what approach PYM might take to developing them. Friends quoted different authorities and held divergent views.

September/October 2021

At its September 18 meeting, Administrative Council considered a “Proposed PYM Policy on Public Expression of Witness in PYM.” The minutes read:

“Christie invited Friends to season a policy on public expression of witness.

- Christie shared that, at times, there is confusion on the content on the website and whether it represents PYM’s formal position or a person or committee or group’s position.
- We try to help people share their witness and allow expression and let them be faithful to their witness, but it might not be Yearly Meeting’s witness; we need a statement that explains the difference and why.
- The next step is seasoning with Quaker Life Council and Friends who may have different opinions on how we frame our witness in the world; and then come back to Admin Council for approval.
- A suggestion was raised to simplify the language in the policy. We need to be careful as a nonprofit to not lobby for politicians or specific legislation.”

Also in September:

- Staff, presiding co-clerks and co-clerks of Eco-Justice Collaborative (EJC) began meeting to discuss the issues as they applied to EJC communications and newsletters.

- Staff began to address the limitations and ambiguities in the nascent policy on public expression of witness.
- Staff spoke with staff at FCNL and shared resources, policies, and information.
- Staff spoke with PYM’s nonprofit attorney who was surprised PYM did not already have an advocacy policy. Such policies are common.

Our attorney and other nonprofit executives recommended PYM create an advocacy policy to provide overall guidance and direction to staff and volunteers. In late October our nonprofit attorney reviewed the initial drafts of communications guidelines and advocacy dos and don’ts.

November 2021

At its November 20 meeting, Admin considered those draft communications guidelines. The minutes read:

“Review of Policies on Communication and Lobbying

General Secretary Christie Duncan-Tessmer provided a context/big-picture review: as we enter into two PYM-wide witnesses on climate change and racial justice, it has become clear that we need policy on how we hold our work together. There will be people active in the yearly meeting on both witnesses whose considered and deeply held views are in contradiction with one another. It is important that PYM be able to hold that diversity and hold a big picture. We began work several months ago on updated communications policies. We have now created a policy and guidelines on what is allowable as advocacy and what is not allowed because it constitutes lobbying.

A Friend with deep professional nonprofit experience noted that it was unusual that a nonprofit did not already have such a policy on lobbying. It is our job as Admin Council to address these issues. After discussion, we agreed that additional seasoning will occur at the Admin Council Meeting in December. We will invite participation from Friends impacted by the guidelines on advocacy and lobbying. The guidelines will be brought back to Administrative Council for approval in January.”

The clerks and staff continued to meet on these issues through November and shared draft guidelines with collaboratives and others.

December 2021

In December, staff and clerks continued to meet regularly with the EJC. Staff shared initial guidelines with staff at FCNL.

On December 6, PYM staff, the Presiding Clerk, Admin Council Clerk, the Treasurer, and a Friend who is active in QLC and EJC, met with our nonprofit attorney. Written questions had been submitted in advance. Conversation focused on two themes: having a broad policy that sets limits applicable to everyone and considering if trying to influence legislation, as the IRS defines lobbying, is relevant to PYM’s larger, more inclusive mission.

A church or religious organization will be regarded as attempting to influence legislation if it contacts, or urges the public to contact, members or employees of a legislative body for the purpose of proposing, supporting or

opposing legislation, or if the organization advocates the adoption or rejection of legislation. Churches and religious organizations may, however, involve themselves in issues of public policy without the activity being considered as lobbying.

The General Secretary also spoke with social justice-oriented nonprofits: with the Executive Director of POWER on December 13, with Friends Committee on Legislation, California, on December 17 and with Pennsylvania Interstate Power & Light on December 17.

In its meeting of December 11, Admin Council had an extended Advocacy Policy discussion. The clerk invited participation from two collaboratives and a politically active Friend. They had all taken an interest in PYM's efforts to create advocacy guidelines. The minutes read:

“The following people joined the meeting one person (or group) at a time to share their reflections on the draft guidelines on lobbying and advocacy activity in PYM and to lift up questions.

- a.) Wanda Wyffels, Clerk of Antiracism Collaborative (ARC)
Wanda shared some queries with Admin Council, including: How does Friends Committee on National Legislation (FCNL) navigate the waters of advocacy vs. lobbying? Are there nuances between lobbying and advocacy not fully fleshed out in the guidelines that an attorney or tax professional could address? How do advocates speak truth to power? Can we make guidelines less directive and more palatable? Maybe use examples of legislation that reflect ARC's concerns: a bill to create a truth and healing commission on Indian boarding school policies, HR40 to create a commission to study reparation proposals for African Americans. Tell our story. What is the root cause for PYM's concern about lobbying?
- b.) Pat Finley and Ruth Darlington, Clerks of EcoJustice Collaborative (EJC), and Robert Greene, a member of Quaker Life Council
In EJC's view, the only way to make a difference on global warming is through systemic change, led by legislation. There is a recognition that PYM's tax status is contingent on complying with the IRS tax code and that PYM's tax status is critical. However, EJC doesn't think they are doing activities that would jeopardize it. In their view, PYM needs to figure out how much lobbying it can do, since acceptable levels of lobbying have not been defined by the courts. EJC wishes to continue its work and also have more say in the process of reviewing a PYM policy on lobbying. PYM might consider establishing a 501(c)(4) organization, similar to FCNL, which is a social welfare nonprofit that is expressly allowed to lobby.
- c.) John Spears, PYM Friend, politically active Republican
John shared his own background and faith story and encouraged us to be open to people of all political and ideological backgrounds and views. He finds some of our communications and news too partisan. In his view, we would be a more welcoming religious community if we were more intentional about being God's big tent and less

focused on politics. In direct response to the draft policy, John said he supports PYM complying with the law and safeguarding our tax-exempt status.

Admin Council members asked questions of our guests and briefly engaged in discussion with them.

Follow-up discussion included a request for some additional research on 501(c)(4) organizations. Linell will supply. **Admin wished to minute its appreciation to Wanda, Robert, Pat, Ruth, and John for joining us and sharing their views. “**

January 2022

In early January, the clerks of EJC met again with the Treasurer and the Presiding Clerks. Staff had follow-up meetings on some additional questions with our attorney and with staff at FCNL. On January 15, Admin Council approved the Advocacy Policy. The minutes read:

“Advocacy Policy

Admin Council members had been provided with a draft Policy on Advocacy and extensive supporting material, which Christie and Linell reviewed. To summarize:

The IRS restricts lobbying for 501(c)(3) organizations and further restricts it for churches.

PYM groups are PYM. When they lobby, PYM is lobbying.

The yearly meeting isn't partisan. PYM should be a place where all people on a path that aligns with our spiritual practices and testimonies feel welcome – regardless of political orientation.

Lobbying became an issue when the entire yearly meeting was asked to come under the weight of a ministry of climate change. Exhortations to lobby have been published in PYM communications channels under the banner of the yearly meeting-wide witness, which means that PYM is lobbying and the lobbying effort is elevated to a new level of visibility.

Christie gave examples of the policy in action, highlighting the differences between advocacy and lobbying, and shared her conversations with non-church 501(c)(3) organizations.

Non-church 501(c)(3) organizations file IRS Form 990 each year and may elect an objective test that permits lobbying within specific parameters based on expenditures. Churches do not file Form 990 and are explicitly prohibited from using the objective test. The IRS asserts broad power and discretion over any church lobbying efforts.

In response to a request from the council last month, Linell researched and reported on 501(c)(4) social welfare organizations.

501(c)(4) organizations cannot receive tax-exempt contributions, but they are permitted to lobby. C4 orgs file IRS Form 990 each year.

501(c)(4) organizations sometimes establish 501(c)(3) charities as separate but affiliated entities. The c3 charity accepts tax-exempt donations and provides donors with a tax deduction. Examples of 501(c)(4) organizations with affiliated 501(c)(3) charities include

AARP, ACLU, Common Cause, Friends Committee on National Legislation, Greenpeace, National Rifle Association, and the Sierra Club.

It is uncommon for a 501(c)(3) charity to further its mission by establishing a 501(c)(4) lobbying arm. The c3 could make restricted gifts to the c4 for charitable programs, but the c4 would have to pay its own start-up costs, lobbying costs, and general operating costs with non-tax-exempt funding. The two organizations would have to maintain appropriate separation or risk the charity's tax-exempt status. The annual 990 filing would disclose any relationships (governance, financial or management) between them.

The Clerk suggested that we present the policy to PYM Collaboratives for comment and bring it back to Admin for approval in February. Christie already planned to speak with PYM Collaboratives. She welcomed a suggestion for an audiovisual tutorial. The Clerk reflected on the times we currently inhabit, which is a change from mutual dependence and trust to a time of polarization and lack of trust, even within our yearly meeting. We need to be faithful and true to our corporate witness and still recognize our responsibility as a religious organization. Jim believes the best way to move forward is to share as much information as we can in the next month.

Council agreed with the direction, especially a draft policy rollout in the next 30 days.

The sense of the Administrative Council was that there are no stops in the policy as presented on page 2 of the "PYM Policy on Advocacy (DRAFT)" document dated January 14, 2022. A Friend asked that the words "of Friends" be appended to the first sentence of the policy and this was approved.

The Policy now reads:

PYM, including groups and meetings in PYM, may advocate for issues and concerns that are rooted in spiritual discernment and the testimonies of Friends.

PYM, including groups and meetings in PYM, may not engage in direct or grassroots lobbying or in political campaigning.

PYM communications channels, programs, or events may not be used by individuals or groups to "call for action" on specific legislation or on candidates for public office."

Following Admin Council's meeting, the General Secretary, the Clerk of Admin Council, and other staff held a series of meetings with PYM collaboratives:

- the Middle East Collaborative on January 25;
- Addressing Racism Collaborative, January 26;
- First Contact Reconciliation Collaborative, January 26;

- Legislative Policy Collaborative, January 31;
- Eco-Justice Collaborative, January 31.

The materials for sharing information about the policy were revised in response to the meetings with collaboratives. They offered more detail about what it looks like in action, including specific examples.

February-August 2022

PYM Administrative Council Clerk and staff published information about the policy including background information and multiple examples of its impact. They held events on Zoom to explain the policy and respond to questions, including a PYM Policy on Advocacy Review and Discussion on April 4 and a session with PYM Quarterly and Monthly Meeting Clerks on June 1. See a May 12 website article, <https://www.pym.org/pym-policy-on-advocacy-explained/>

The posted information was updated to include a video of the explanation and responses to the questions asked at the events.

On July 16, members of the Legislative Policy Collaborative joined Admin Council's meeting. The minutes read:

"Members of Legislative Policy Collaborative joined Admin Council: Lynn Oberfield, co-clerk, Deb Hejl, and Margaret Mansfield. Lynn had written to Christie Duncan-Tessmer and the Co-Clerks of PYM about the PYM Advocacy Policy. The LPC members did a verbal presentation of the collaborative's work on national, state, and local legislation in conjunction with FCNL, the Friends Committee on National Legislation, a 501(c)(4) lobbying organization. They addressed the fine lines and conflicting interpretations between activity permitted under PYM's policy and activities which are not allowed. They asked for a written response to the 15 examples of action in their letter that they viewed as permissible and effective.

Christie reviewed PYM's position, starting with appreciation for the collaborative's work to connect PYM Friends and meetings with FCNL and model faith in action. She had reviewed all the hypothetical and actual examples in their letter. The one thing PYM Friends, acting and speaking for PYM or their meetings, cannot do is lobby, that is, ask legislators to vote or act on specific legislation. Everything else the letter suggested was in alignment with the policy, which says groups and meetings in PYM may advocate for issues and concerns that are rooted in spiritual discernment and the testimonies of Friends. PYM Friends appointed to FCNL or volunteering with FCNL are acting and speaking for FCNL. They may lobby, as that is the practice FCNL was born to do.

Collaborative members continued to raise difficult questions about acceptable activity through FCNL, as well as the need to act and effect change at the state and county levels. Friends entered deep and lengthy discussion about the mechanics of the policy. The discussion included elements of spiritual reflection about core values of Friends, ideas on how Friends may engage with non-church groups to lobby, and how the range

of actions allowed by advocacy permitted everything in the collaborative's letter, except the few examples of lobbying.

After extended discussion, Jim thanked members of the Legislative Policy Collaborative for their thoughtful participation and concern for the matter they brought to Administrative Council."

A short overview of the policy was shared at Annual Sessions and Friends were directed to ask questions of the General Secretary. Two people followed up and the General Secretary met with them.

Spring and Summer 2023

A quarterly meeting and a monthly meeting minuted their concern and questions about the policy. The Presiding Clerk followed up to ask the meetings to invite someone to meet with them and hear their concerns and answer their questions.