Does my organization’s advocacy on federal issues mean it needs to make a campaign-related disbursement disclosure or other disclosure of its donors?

**Is your organization a 501(c)(3)?**

**YES**

- Your advocacy is not subject to CRD disclosure, even if your communications would be subject to CRD disclosure if it was a covered organization.

**NO**

- NO, it is a (c)(4), union, LLC, or other specified non-501(c)(3) entity.

**Is your organization a 501(c)(3)?**

**YES**

- Have you spent >$10,000 on federal advocacy over a 2-year election cycle (definition differs slightly in FECA), or calendar year for federal judicial nomination communications, that meets the definition of campaign related disbursements (CRD)?

- A communication that expressly advocates — or there is no other reasonable interpretation — for election or defeat of a federal candidate.

- A communication made by means of broadcast, cable, satellite, magazine, newspaper, outdoor advertising facility, mass mail, phone bank, paid internet or paid digital.

- Any communication that promotes, supports, attacks, or opposes the nomination or Senate confirmation of an individual as a Federal judge or justice, and made by means of:
  - paid broadcast, cable, satellite; or
  - paid internet or paid digital communication; or
  - paid promotion; or
  - newspaper, magazine, outdoor advertising (billboard); or
  - mass mailing; or
  - telephone bank or telephonic messaging effort of more than 500 similar calls or electronic messages within a 30-day period; or
  - any other form of general public political advertising.

- A broadcast, cable, satellite, paid internet, or paid digital communication made 30 days before a federal primary or 60 days before a general election which refers to a clearly identified federal candidate (almost all, if not all, elected federal officials).

- Any transfer of funds, such as a grant for an advocacy campaign, by a covered organization to another person (probably entity) if:
  - The organization suggests the funds be used for a CRD (or making a transfer to another for making a CRD); or
  - The transfer is in response to a request for a donation for a CRD; or
  - The covered organization engaged in discussions with the recipient of the transfer about making or paying for a CRD; or
  - The transferor made a CRD in an aggregate amount of $50,000 or more in a two-year period or transferor had reason to know the recipient had made CRDs of more than $50,000 in a two-year period; or transferor knew or had reason to know recipient would make.

**NO**

- Your organization is not subject to CRD disclosure, but it is probably not making any impact on policy.

**Your org must make a CRD disclosure, and depending on format, the CRD may need to make a Stand By Every Ad disclosure.**

**Your org has made a CRD if your org’s expenditure’s meet any of the following five definitions.**

- An Independent expenditure (IE); AND/OR

- A public communication that promotes, attacks, supports, or opposes a clearly identified candidate; AND/OR

- A federal judicial nomination communication; AND/OR

- An electioneering communication; AND/OR

- Makes a covered transfer.

**NOTE:** Intent to influence the outcome of an election is not a required element in this analysis. Any advocacy and lobbying effort by a 501(c)(4) or other covered organization that meets the definition of a CRD is subject to the disclosure requirements.