

November 17, 2020



Public Affairs
Council

Federal Regulatory Advocacy Bootcamp

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Public Affairs Council Profile

Year Founded	1954
Total Members	700+ organizations
Total Individuals	10,000+
Events Per Year	100+
Total Staff	23
Office Locations	Washington/Brussels
Politics	Nonpartisan/Nonpolitical



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Certificate Programs: Advance your career



The **Certificate in Public Affairs Management** helps strengthen knowledge and expertise in management, leadership and strategy.

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The **Certificate in Government Relations and Lobbying** is designed for federal, state, or regulatory lobbyists or government relations professionals seeking to deepen their expertise in the best practices and strategies needed to influence policy and to be leaders in the field.

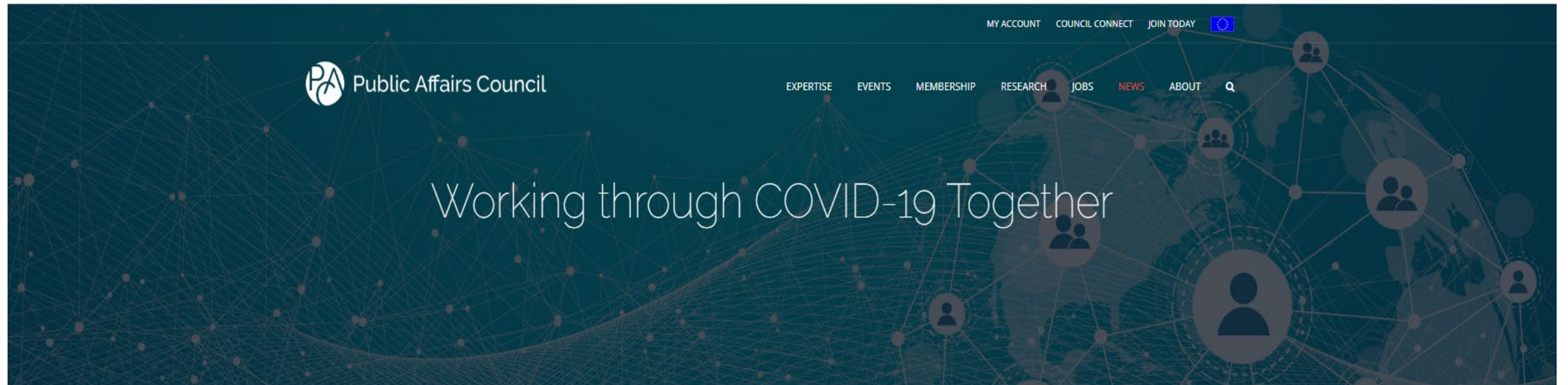
Certificate Program Informational Webinar

[Register](#)



November 19, 2020
1 p.m.–2 p.m. ET

Interested in learning how to grow your professional credentials with the Council? Tune in to learn more about our professional certifications in PAC & Grassroots Management and Public Affairs Management.



Information, new ideas and expertise for public affairs professionals.
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COVID-19 Announcements and Access to Expertise

Agenda

9:30 – 10:45 – Navigating the Federal Regulatory Landscape



James Broughel, Ph.D.
Regulatory Economist
George Mason University



Nathan Frey
Principal and Owner
Regulatory Strategies and Solutions Group

10:45 – 11:00 – Break

11:00 – 12:30 – Regulatory Advocacy: Implementing, Influencing, and Showing Value



Saat Alety
Director, Federal Affairs and Public Policy
Allstate



Lauren M. Foe
Senior Regulatory Associate
American College of Surgeons



RSSGROUP
REGULATORY STRATEGIES AND SOLUTIONS
GROUP LLC

Preparing for a Shift in Federal Regulation

Nathan Frey
Regulatory Strategies and Solutions Group

November 17, 2020



Agenda

I. Regulatory activity for next 6 months

II. Planning tools for Regulatory Advocacy

III. Recommendations



Midnight Regulations

- So many rules, so little time....
- Rush clashes with requirements of the Administrative Procedures Act
 - Notice and comment
 - Administrative Record
- Competition among Departments and Agencies
- Backlog at the Federal Register
 - Which rules will make it across the finish line?



Regulatory Freeze

- Halt the presses on uncompleted rules of previous Administration
 - Any rule NOT PUBLISHED in the Federal Register by 1/20/21 is fair game
 - E.R. backlog
- Extend effective dates for final rules published in the E.R. but not yet in effect
 - Rulemaking required to fully repeal these



Regulatory Roll-back

- Targeting of regulations for elimination
 - Resource and time intensive
 - Withdraw administratively: 469 rules in Trump Administration
- Final Actions require new rulemaking to “un-do”
- Congressional Review Act?



Procedural Reforms

- Withdraw Executive Orders on Regulatory Policy
 - EO 13771: Regulatory budgets
 - Agency guidance memo
 - Energy Independence, other policy specific EOs
- New Executive Actions Focused on Regulatory Process Expected
 - More centralized oversight or empowering agencies?
- Changes for OIRA?



Regulatory Planning Tools

- What's under OIRA review?
 - www.reginfo.gov
- Agency regulatory dockets
 - www.regulations.gov
- Agency Regulatory Plans and Semi-Annual Unified Regulatory Agenda



www.reginfo.gov

← → ↺ 🏠 <https://www.reginfo.gov/public/> 📄 ⋮ 📧 ☆

🔍 Most Visited 🌐 Getting Started 🔍 Google

🇺🇸 An official website of the United States government



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Agenda ● Reg Review ● ICR

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AGENCIES WITH THE MOST REGULATORY ACTIONS CURRENTLY UNDER REVIEW



Agency	Number of Pending Actions
EPA	24
HHS	17
DOD	16
DHS	12
USA	11
DOJ	8
DOY	8
HEP	6
DOU	5
IREAS	5

Total Pending Actions: 144

Pending Actions By Rule Stage



Rule Stage	Count
Proposed Rule	62
Final Rule	36
Review	15
Other	7

View By Rule Stage:

REGULATORY REVIEW

Executive Order 12866 directs agencies to follow certain principles in rulemaking, such as consideration of alternatives and analysis of benefits and costs, and describes OIRA's role in the rulemaking process.

- Regulations under EO 12866 Review
- Regulatory Reviews Completed in Last 30 Days

[More about Regulatory Review >>](#)

UNIFIED AGENDA and REGULATORY PLAN

The Unified Agenda and Regulatory Plan provide uniform reporting of data on regulatory and deregulatory actions under development throughout the Federal government, covering over 60 departments, agencies, and commissions.

- The 2020 Spring Agenda was published on 6/30/2020

[More about Agenda >>](#)

ICR DASHBOARD

INFORMATION COLLECTIONS REVIEW PENDING BY TYPE



ICR Type	Count
Information Collection	179
Other	160
Review	10

INFORMATION COLLECTION REVIEW

The Paperwork Reduction Act requires that agency information collections minimize duplication and burden on the public, have practical utility, and support the proper performance of the agency's mission.

[More about Information Collection Review >>](#)

WHAT'S NEW

submit comments directly to OMB by using the comment button on either the "ICR Details" page or the "List of ICRs Currently Under Review" page.

- We have automated our Executive Order 12866 meeting request process! If the public is interested in requesting a meeting with OIRA for draft regulatory actions under Executive Order 12866 review, please visit the [EO 12866 Meeting Request](#) page.
- Regulatory Reform Results for FY 19 are now available.

A guide to the Paperwork Reduction Act



The Reg Map



The Reg Map gives an overview of the information review process.

Comment on Federal Rulemaking

Regulations.gov provides a central location for public comments on proposed regulations.



Regulations.gov

Regulations.gov Beta

https://beta.regulations.gov

Most Visited Getting Started Google

Beta Evaluation Only | Site Work In Progress | For the official site, visit www.regulations.gov

An official website of the United States Government

Regulations.gov will redirect users to beta.regulations.gov on Tuesdays and Thursdays for 24 hours starting at 6am L.T. Please note that all comments submitted through Beta, both during the redirect and regular operations, are provided to agencies.

Regulations.gov

Your Voice in Federal Decision Making

SUPPORT

FEEDBACK

Make a difference. Submit your comments and let your voice be heard.

Search for Rules, Proposed Rules, Notices or Supporting Documents

Search

What is Regulations.gov Beta?

The Regulations.gov beta is a re-envisioning of Regulations.gov, with enhanced search capabilities, a simplified commenting process, and a brand new design to improve the user experience in public commenting.

Read More About the Beta

Watch Our Introduction Video

Explore

Comments Due Soon

Today	15
Next 3 Days	51
Next 7 Days	162

Posted Recently

Today	100
Last 3 Days	184
Last 7 Days	367

Dockets

Disregulatory	586
Economically Significant	824
Major Rule	653

U.S. CITIZENSHIP AND IMMIGRATION SERVICES

30 DAY IC COMMENTS CLOSE ON 11/9/2020; 60- DAY COMMENTS CLOSE ON 12/7/2020; Strengthening L...

Comments Due - December 07, 2020

EMPLOYMENT AND TRAINING ADMINISTRATION

Strengthening Wage Protections for the Temporary and Permanent Employment of Certain Aliens

Comments Due - November 09, 2020

Unified Agenda and Regulatory Plan

- Published twice each year – Spring and Fall
 - Uniform data on planned regulatory actions for 60 Departments, agencies and Commissions
 - Long-term actions and “inactive” list
 - Regulatory Plan = statement of priorities
- Transparency for stakeholders, Congress, public
 - Oversight by OIRA



Effective Public Comments

- Building the administrative record to support your preferred alternative
- Supporting documents: RIA, TSDs, NEPA
- Preamble language vs Regulatory Text
- Solution oriented
- Public policy tradeoffs and unintended consequences
- Leveraging proxies



Recommendations

- Expect a dramatic increase in regulatory activity over the next year
 - Energy and environment
 - Health Care
 - Immigration
 - Worker Safety
- Familiarize yourself with public facing regulatory planning tools
- Know your OIRA desk officers
- Importance of administrative records to support policy positions



Thank You!

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100+years

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REGULATORY ADVOCACY INSIGHTS & BEST PRACTICES

Lauren M. Foe, MPH
Senior Associate, Regulatory Affairs

ACS' REGULATORY/LEGISLATIVE ADVOCACY ACTIVITY TARGETS



FEDERAL AGENCIES

*(e.g., HHS → CMS, FDA, CDC,
ONC, OIG, OCR)*



CAPITOL HILL

*(e.g., Members of
Congress, committee staff)*



WHITE HOUSE

(e.g., task forces)



PHYSICIANS

*(e.g., ACS Fellows,
specialty societies, medical
practice staff)*

ACS Regulatory Advocacy Case Study: Stop Overregulating My OR (SOMO)



*Established to address widespread concern
in the physician community about
administrative burden*

ACS Regulatory Advocacy Case Study: Stop Overregulating My OR (SOMO)

Best Practice

BRANDING & MEMBERSHIP ENGAGEMENT



We need your help to identify which policies are most burdensome for surgeons and their practices.

👉 [Participate in the ACS SOMO questionnaire](#)

Make a difference. Share your burden.

✉ [Contact ACS!](#)

🐦 [Tweet #SOMO](#) with your story!

ACS Regulatory Advocacy Case Study: Stop Overregulating My OR (SOMO)

Best Practice

COALITION BUILDING



The Regulatory Relief Coalition (RRC) is a group of national physician specialty organizations advocating for regulatory burden reduction in Medicare so that physicians can spend more time treating patients.

Most recently, we have focused on common sense reform of Medicare Advantage plans use of prior authorization. Our aim is to ensure that prior authorization is not a barrier to timely access to care for the patients we serve.

ACS Regulatory Advocacy Case Study: Stop Overregulating My OR (SOMO)

Best Practice

FEDERAL OUTREACH

**PATIENTS
OVER PAPERWORK**



**Presidential Executive Order on
Reducing Regulation and
Controlling Regulatory Costs**

ACS Regulatory Advocacy Case Study: Stop Overregulating My OR (SOMO)

Best Practice

HIGHLIGHT ADVOCACY ACTIVITIES

Regulatory Relief Wins >



The College has positioned itself at the forefront of the regulatory relief movement and has been successful in achieving burden reduction for surgeons. Find out more about the ACS' regulatory relief accomplishments.

[!\[\]\(c694a3ff3b077d76910920a6a1593ab4_img.jpg\) Learn more](#)

Regulatory Relief Asks >



The ACS has numerous recommendations for ways to further reduce the regulatory burden placed on physicians. Find out more about the College's regulatory relief proposals.

[!\[\]\(dd161862f9164df98f62b726e9846241_img.jpg\) Learn more](#)

ACS Advocacy Efforts >



The College tirelessly advocates for the reduction of administrative burden on behalf of its Fellows.

[!\[\]\(a8f9309f944226d1420f5fed22e2b6e6_img.jpg\) Learn more](#)

MEASURING ADVOCACY SUCCESS

Components of Your “Policy Brand” and Effectiveness

DC POLICY BRAND

The ACS measures its long-term reputation in Washington and “brand” *among the policymaking audience* based on four specific measures.

RESPECT

Do policymakers respect your role in policy conversations?

CONSIDERATION

Do policymakers consider your views and input on issues?

INFLUENCE

Do those views and input actually influence policymakers?

SHARING

Do policymakers proactively seek out and/or share your view and input on relevant

Advocacy Activities that Matter Most to Policymakers

Concept in Research	What it Means
Consensus	Does the organization negotiate for consensus and is open to making reasonable trade-offs on tough issues ?
Framing	Does the organization frame its arguments in a relevant way?
Research & Data	Does the organization contribute accurate and reliable research and data to inform policy development?
Industry Leadership	Does the organization demonstrate a commitment to high standards and sound industry practices?
Industry Voice	Does the organization represent the voice of the entire industry and/or the interests of all its members?
Partnerships	Does the organization participate in effective coalitions with credible partner organizations and thought leaders?
Senior Leadership	Does the organization's senior leadership effectively participate in policy discussions?
Lobbyists	Does the organization have effective lobbying representation, who build and maintain direct relationships with policymakers, regulators, and other key individuals?
Grassroots	Does the organization effectively mobilize individual stakeholders (e.g., employees, members, the public) to engage policymakers?
Advocacy Comms.	Does the organization effectively use media, events, and/or other public communications to engage on policy issues?

Advocacy Activities that Differentiate Top Performing Associations

200+
ELEMENTS
TESTED

To determine what distinguishes the best associations advocating in Washington

WORKING ON YOUR INDUSTRY IMAGE



INDUSTRY
LEADERSHIP



INDUSTRY VOICE

WORKING ON PUBLIC POLICY



FRAMING



RESEARCH &
DATA



CONSENSUS

MESSENGERS



LOBBYISTS



LEADERSHIP



GRASSROOTS



PARTNERSHIPS

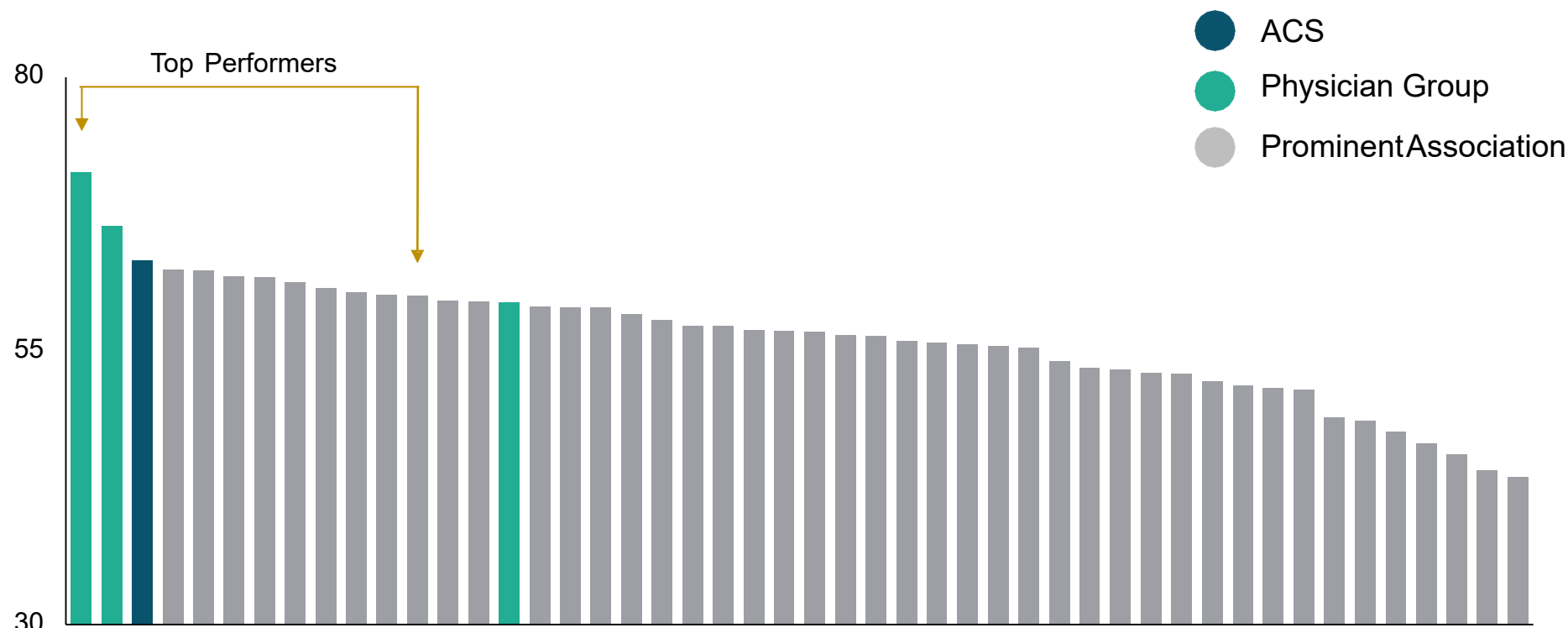


COMMUNICATIONS

ACS Reputation in DC

Washington Policy Brand

Comparison to All Associations Studied

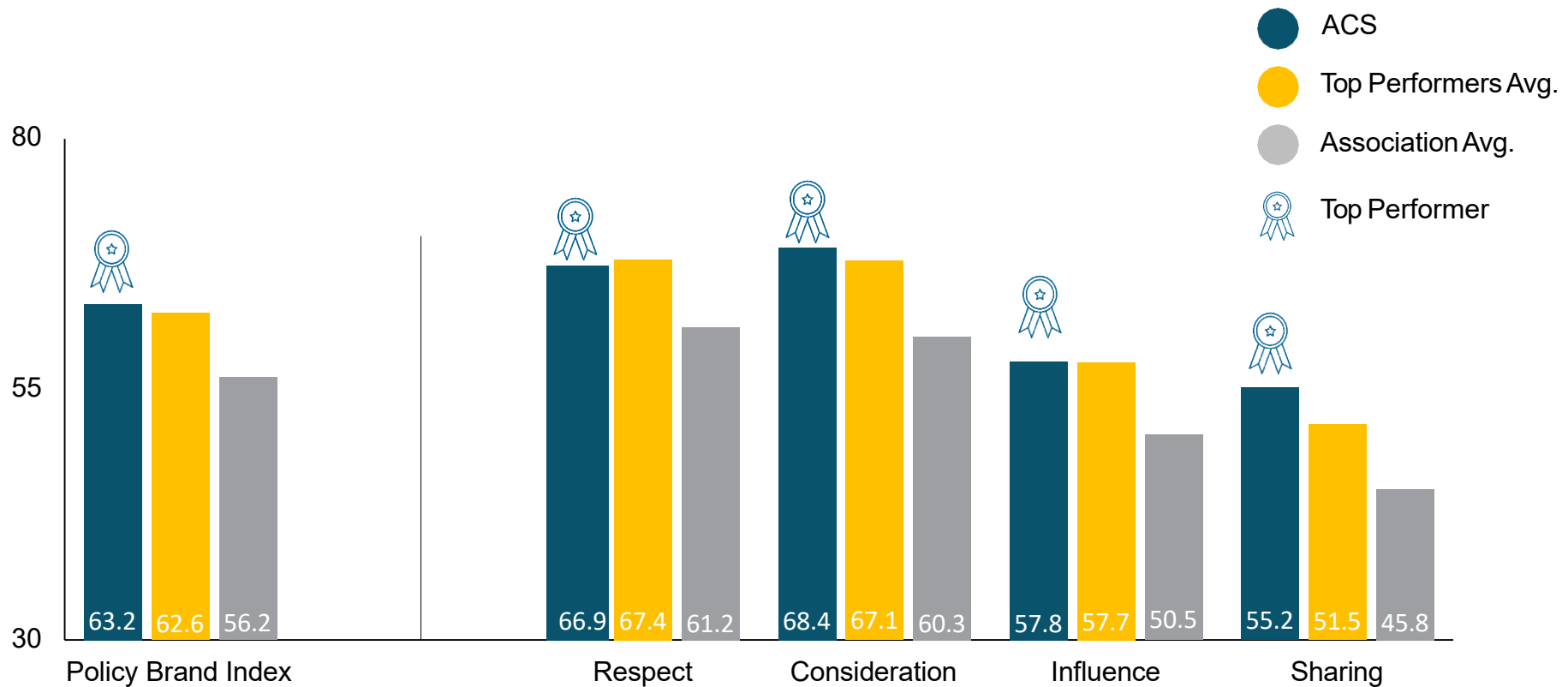


Policy Brand and Reputation is a combination of scores based on the four distinct measures of policy brand: **Respect, Consideration, Influence, and Sharing.**

ACS Is a Top Performer Across Every Measure of Long-Term Effectiveness Studied

Long-Term Advocacy Measures

ACS vs. Top Performers and Association Averages



Policy Brand and Reputation is a combination of scores based on the four distinct measures of policy brand: **Respect, Consideration, Influence, and Sharing.**

Key Elements of the ACS Brand in DC

**Credible
Expert**



**Leader in the
Physician Space**



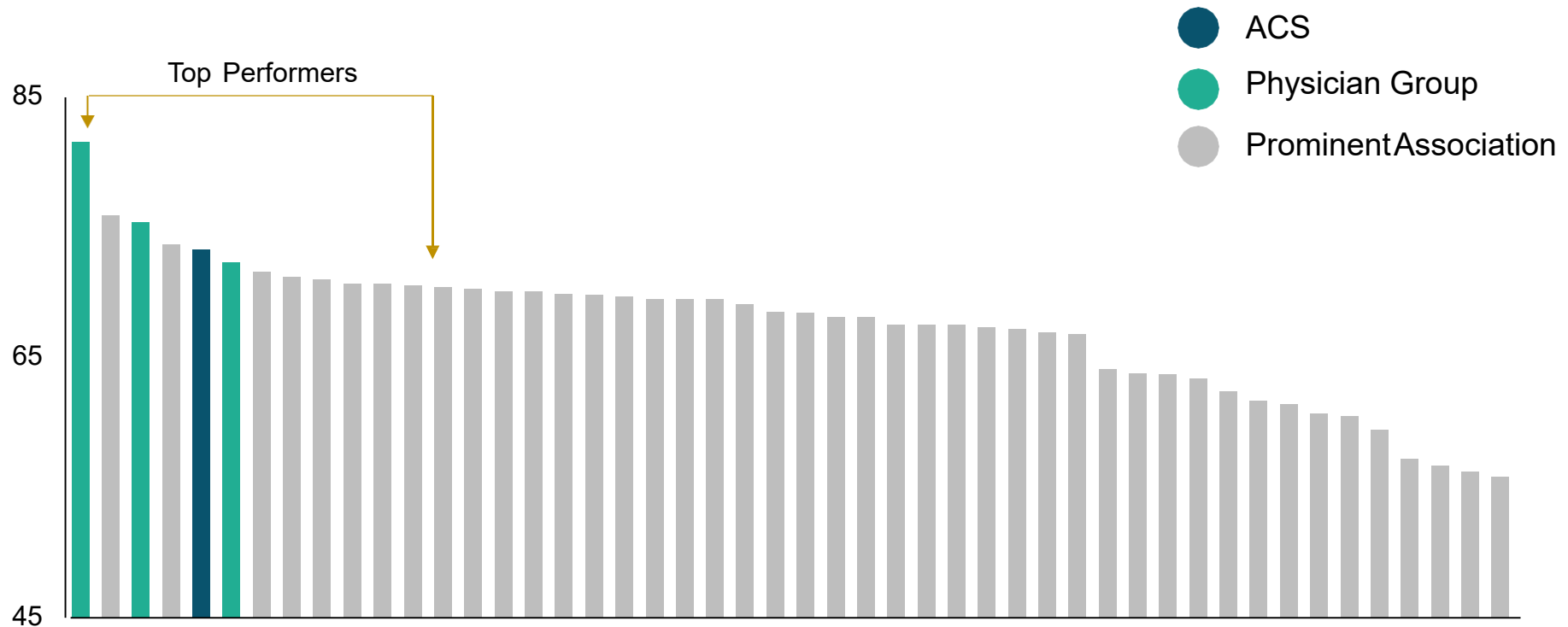
**Influential
Advocate**



ACS Effectively Provides Research and Data to Drive Policy

Research and Data

Compared to All Associations Studied

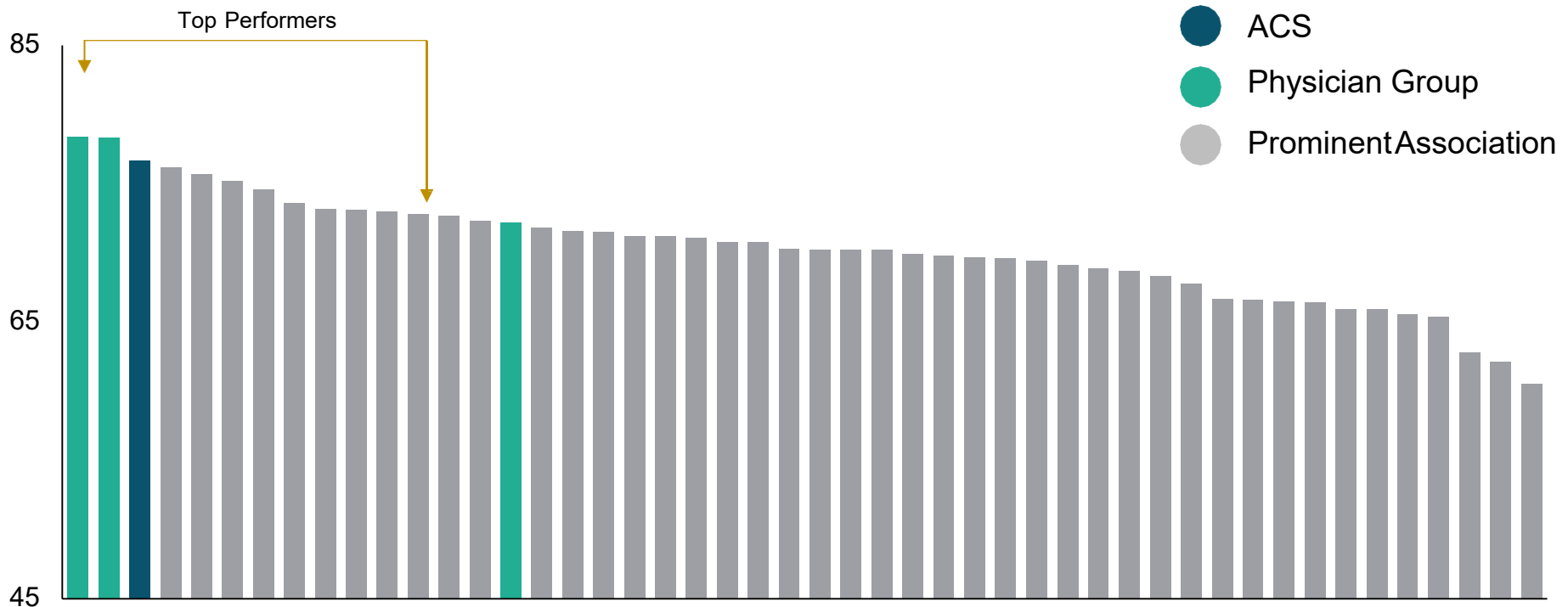


The organization contributes reliable **research and data** to inform policy.

ACS Plays a Key Role Bringing Together Effective, Credible Coalitions

Partnerships

Compared to All Associations Studied

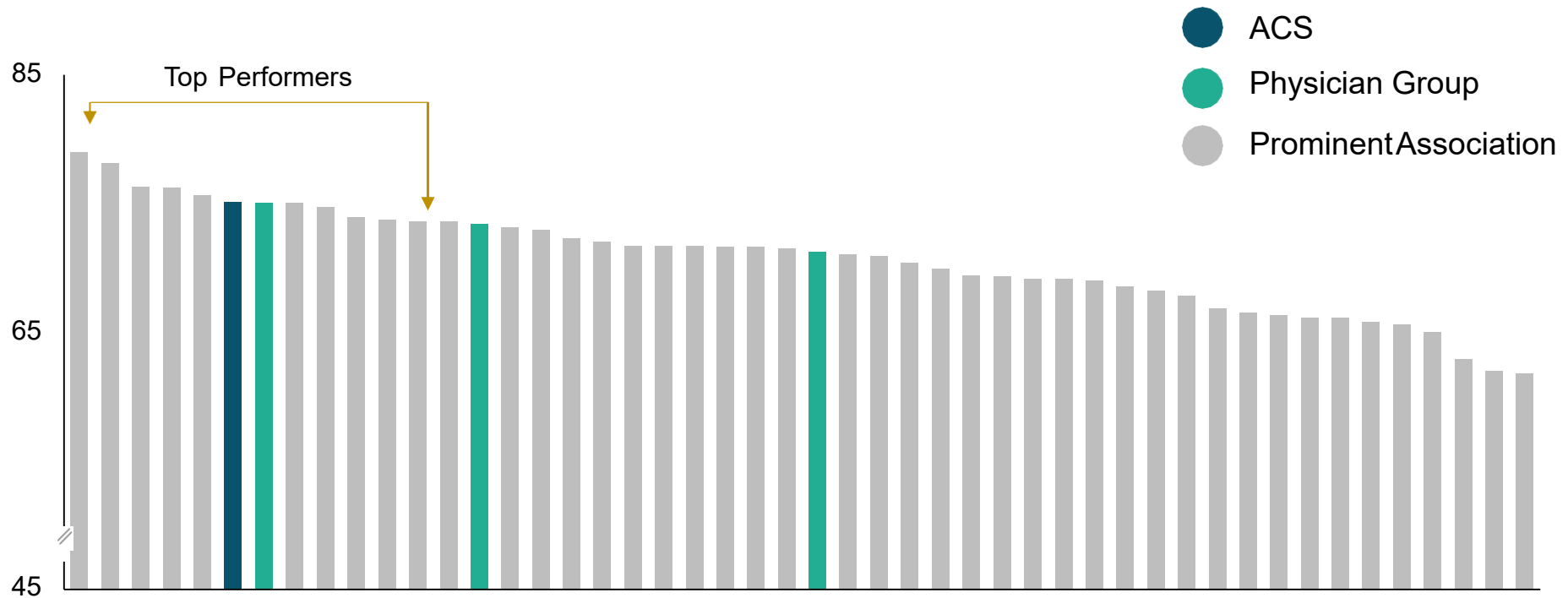


The organization participated in **effective coalitions** with credible partner organizations and thought leaders.

ACS is Seen as a Credible Voice for the Industry and the Interests of Its Members

Industry Voice

Compared to All Associations Studied



The organization represent the **voice of the entire industry** and/or the interests of all its members.

How do the Most Effective Associations Communicate their Research and Data?

Best Practice

Best Practices from the Federal Research

A Sample of What We've Heard

"A one-pager is great when the legislation is already written and on the floor. White papers tend to be more helpful in the thinking stages. **Charts and graphs are a lot more helpful on the fly, when you're trying to get a speech done.**"

— Senior Staff, Congressional Committee

"**One page.** Start with your top priority. Give quick bullet points in bold each with a quick summary. I can't tell you how many times someone comes in - even friendly groups - and gives us a stack of things that goes immediately into the trash."

— Chief of Staff, Capitol Hill

"You have to look at **sources' credibility. If I cite a private sector organization, I'm scrutinized more** because it's industry. But it's different if I cite the American Federation of Scientists, for example."

— Deputy Chief of Staff, Capitol Hill

High-Impact Research

P

Use simple language

P

Customize research to align with the status of legislation/regulation

P

Tailor data for personal staff (e.g., district-level data, relevant issues)

P

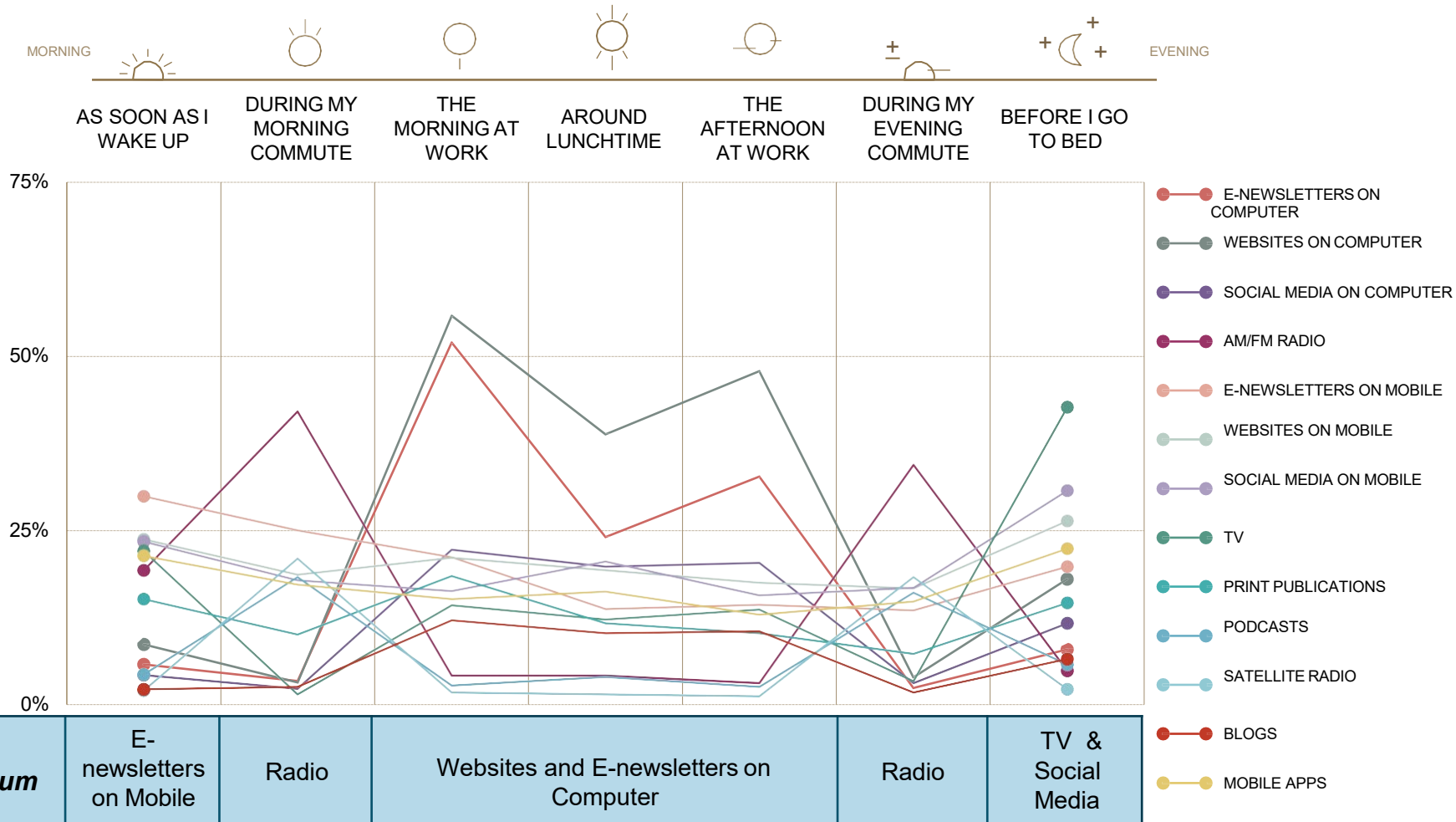
Provide a deeper dive of data to supplement one-pagers, especially for Committee/Agency staff

P

Give policymakers confidence in the data source (e.g., thorough citations, partner with third parties)

Challenge: Cutting Through the Chatter in DC

Best Practice



Policymakers Expect to See Associations Engaging Across Multiple Platforms

Best Practice

Senior Leadership

Example: Senior Leadership & Social Media

Amplify leadership messaging through pre-existing social media apparatus

Social Media

Paid Media

Partnerships

Example: Partnerships & Lobbyists

Leverage content and programming created by partners during policy conversations

Lobbyists

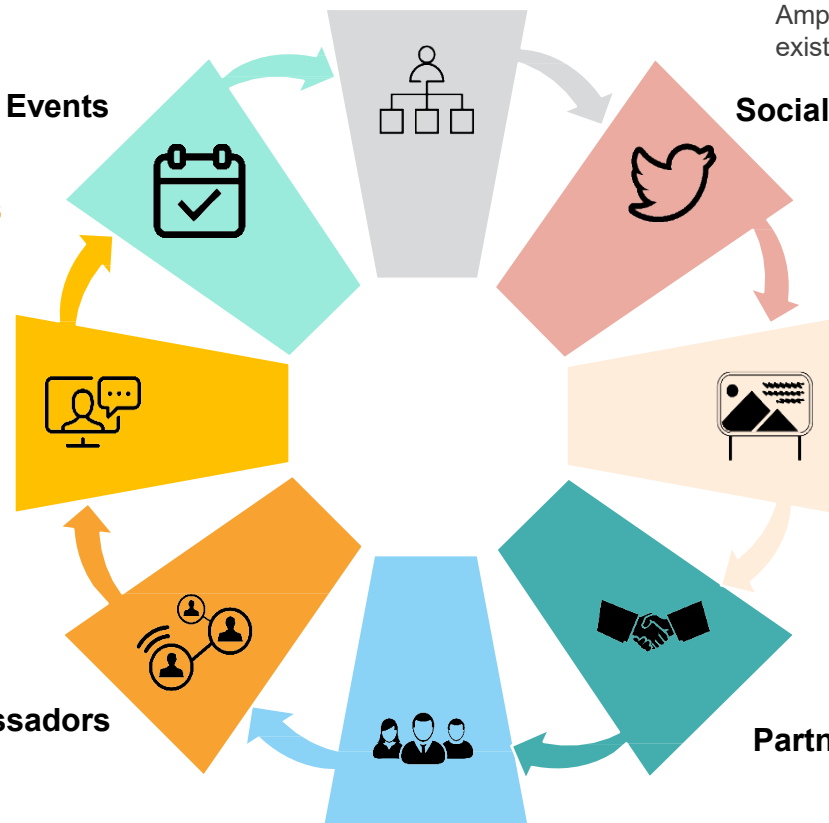
Ambassadors

Earned Media

Events

Example: Earned Media & Events

Invite journalists to attend events and provide coverage



Best Practices—What Works Best for Your Organization, and Where Can You Improve?

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Research & Data	Does the organization contribute accurate and reliable research and data to inform policy development?
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100+ years

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VS



Age of Regulatory Supremacy – Given that divided government has characterized the last decade in Washington, past Administrations have increasingly relied on enacting their policy priorities via regulatory action. These actions often carry much of, if not all, the weight of enacted laws and have impacted all industries from telecommunications to financial services to energy.

Power of Regulatory Process – Although rules and regulations are not promulgated by duly elected representatives, they are often the result of long and well-laid out processes. There are many stages during which outside actors can engage to influence, shape, strengthen, or block rules and regulations. These actions include official comments, agency hearings, meetings with key agency staff, and litigation.

Article I – Congress has an immense sway in the regulatory process, whether through personnel confirmations or directing agencies on how to act. Identify Members of Congress that have strong relationship with your targeted agency. Get them engaged and give them every tool in the toolbox: Hearing questions, letters, suggestions on private meetings, etc.



Building a Regulatory Advocacy Program

Utilize Your Internal Resources – Regulatory issues are often dense, complex and nuanced requiring in-depth expertise to analyze and articulate the potential impact to your company. This requires you to identify your key business leads who can act as critical partners and communicators on behalf of your company and keep them engaged through regular communication and engagement.

- Example: Allstate has harnessed the institutional knowledge of our lead accountants to respond to various capital, reporting and standard setting regulatory proposals.

Multipronged Approach – Lobbying and comment letters alone may not be enough to promote your regulatory position. It is important that you utilize every tool in the toolkit including:

- Direct Lobbying: Engage with members and staff through your federal affairs team and when appropriate use your internal experts to deliver the often necessary complex details.
- Strength in Numbers: Chances are there are plenty of other organizations that have the same opinion so build a coalition of companies, trade associations, and other groups to strengthen your message.
- Power of Constituents: When appropriate there is nothing stronger than the voice of a constituent when asking a member of Congress to help with your agenda. Find your appropriate impacted audience, such as insurance agents, and engage them to carry your message forward.



Examples of Regulatory Process Success

Fiduciary Rule – After the Department of Labor enacted its Obama-era fiduciary standard for financial advice, industry allies successfully litigated the rule in the courts where it was eventually vacated, all the while generating hearings, letters of oppositions, and events from Members of Congress and the grassroots.

- **Team Effort**: These efforts likely would not have been successful had it not been for the multifaceted advocacy effort taken to confront the regulation. Industry companies and trade associations were able to harness the power of our employees and the consumers they serve to show the real-life impact of a rule many thought would help protect people from harmful financial advice, but actually would have prevented many from essential financial assistance while driving people and companies to the brink.



Examples of Regulatory Process Success

U.S.-EU Covered Agreement – Prior to signing a final deal regarding mutually agreed upon prudential measures in the insurance industry, industry worked to have dozens of Congressional allies sign a letter to Treasury and USTR that resulted in a clarification statement to fix the issues industry had with the draft agreement.

- **Not Over Until Its Over**: This success shows how important it is not to give up or assume a particular outcome. Many believed that given the timing of the agreement going final (the early days of the Trump Administration) that we would be in good hands. However, we had to continue the push with the new administration to get these critical clarifications to protect U.S. insurance interests.

International Capital Standards – Industry has used the entire regulatory process to help shape and amend the development and implementation of an international insurance capital regime promulgated by the International Association of Insurance Supervisors. Actions have included: dozens of hearing questions written for Congressional hearings, Congressional letters sent to “Team USA” regulators to push our priorities abroad, official comment letters throughout the process.

- **Fighting Amongst Friends**: As this regulatory battle continues industry remains divided on some core components. It is important to understand where your own company’s interests lay, the level of impact an issue may have and who are your allies.



Public Affairs
Council

Some Quick Tips for Measuring and Showing Value

2020

Negative Impact of the COVID-19 Pandemic Expected

	Negative Impact
Public affairs budget allocated for business travel and/or in-person meetings	82%
Implementation of public affairs initiatives/actions planned prior to the pandemic	54%
Total public affairs budget	48%
Public affairs budget allocated for contract lobbyists and consultants	36%
Public affairs budget allocated for trade or business associations	34%
Overall operational effectiveness of your company's public affairs function	27%
Total number of FTE public affairs staff	20%

SCPA 2020

I. Basic Principles of Measurement & Communication

Principle 1: Understand What GR Brings to the Table (The Value Proposition)

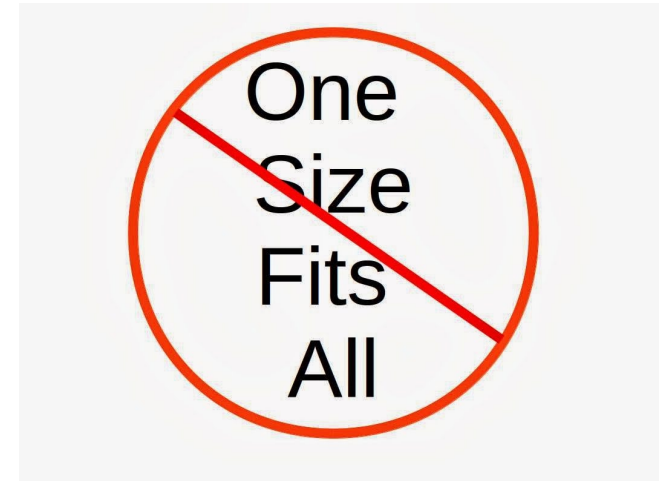
Government Relations:

1. Shapes public policy
2. Shapes public perception
3. Preserves and maintains reputation
4. Creates market and revenue opportunities/advantages
5. Reduces operating costs
6. Provides freedom to operate

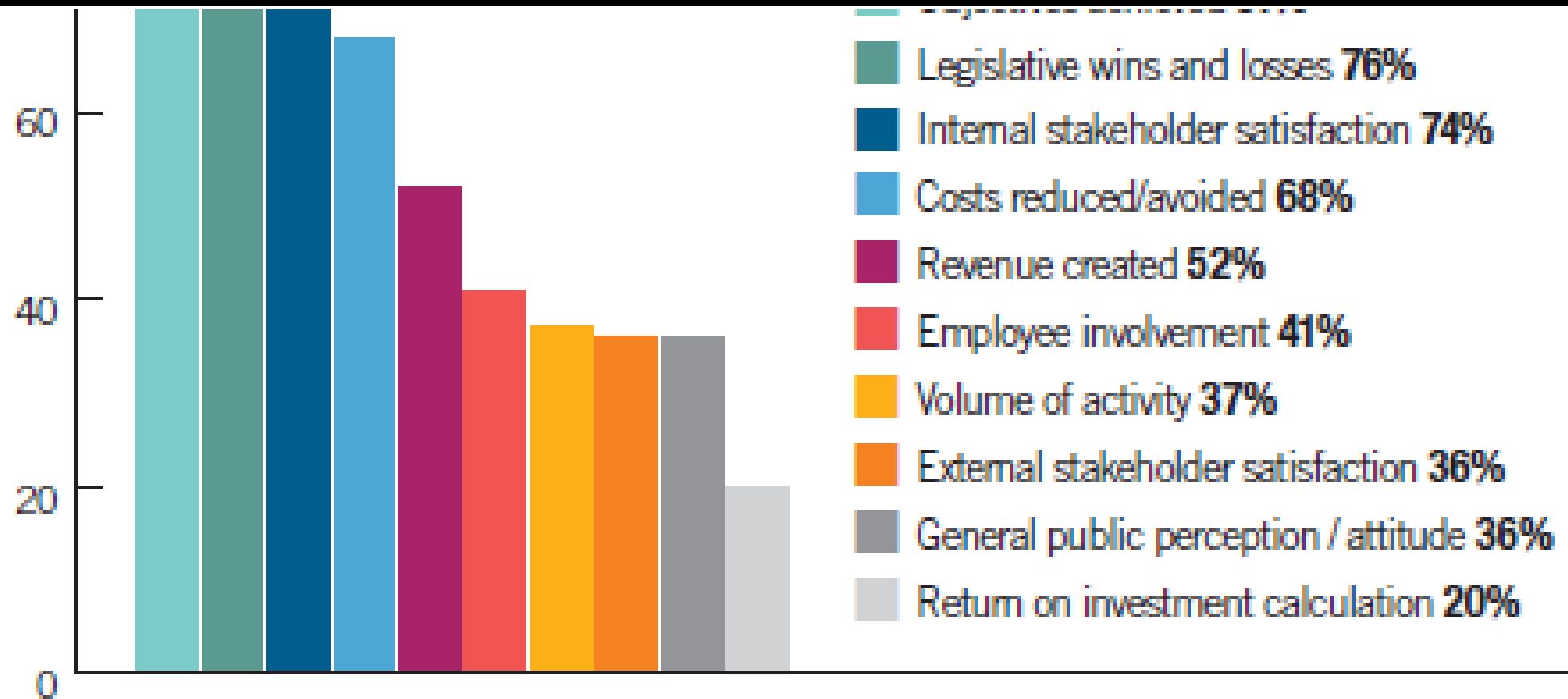


Principle 2: Understand There is No Magic Formula

1. Select your measurement tools based on your work and on your leadership
2. Match your messaging to your organizational culture
3. Get early buy-in and agreement from stakeholders
4. Resist the urge to oversell or undersell



II. Choosing Your Metrics



MOST COMMON MEASUREMENT TOOLS FROM SCPA 2020

Tool: Objectives Achieved

1. Actually document. Include improvement metrics
2. Map objectives/achievements to organization's mission and goals and when possible, to \$
3. An organization's stated mission and strategic goals may even directly provide metrics
4. Don't forget: outcome over input/output- **Measure, don't count!**

Inputs, Outputs, and Outcomes

Inputs	Outputs	Outcomes
5 newsletters; on time; on budget	Readership	Impact on behavior; increased understanding of issues
PA Web page up and current	Hits	Change in attitudes and awareness
# events organized	Attendance	Enhanced relationships
# news releases; placed stories	Coverage, recall	Changed opinions/ behavior of stakeholders
Develop sustainability report	Readership; awards	Impact on business behavior; reputation
# meetings with officials	Responses	Influence on policy

Actions vs. Impacts

Actions

Impacts

Meetings held with agency staff	—————→	Achieved name recognition with agency
Created member advisory board	—————→	Increased investment in association
Received major trade journal coverage	—————→	Tone of media coverage improved
Engaged employees via social media	—————→	Click rates, “likes” and retweets rose
Formed coalition	—————→	Coalition increased political influence
Wrote comment letter	—————→	Received engagement from agency

Tool: Regulatory Wins and Losses

1. Document – especially important for losses
2. Ties policies to mission/goals
3. Tie to bottom line: assign dollar values to policies & regulation

Jurisdiction	Issue	Status & Outcome	Position	Actions Taken	Business Impact
Direct Selling					
Arkansas SB 176	Pyramid Schemes	Passed - Favorable	Support	Grassroots letter campaign; 10 constituents sent letters	4,043 IBCs \$ 6.2M Wholesale
California AB 5	Independent Contractor Status	Pending - Favorable	Support	3 meetings with committee members	48,898 IBCs \$ 74.5M Wholesale
Connecticut SB 955	Independent Contractor Status	Pending	Support		2,628 IBCs \$ 4.9M Wholesale
Indiana SB 231	Independent Contractor Status	Passed - Favorable	Support		12,723 IBCs \$ 19.7M Wholesale
Iowa SB 4 / HB 262	Pyramid Schemes	Failed	Support		6,449 IBCs \$ 9.9M Wholesale
Oregon SB 679	Independent Contractor Status	Pending	Support		5,889 IBCs \$ 9.7M Wholesale
Pennsylvania	Pyramid Schemes	Pending - To be introduced	Support		14,846 IBCs \$ 24.1M Wholesale
Product					
California AB 60	Sunscreen	Failed - Favorable	Oppose		48,898 IBCs 19 SKUs containing Oxybenzone and Octinoxate Wholesale CA Total Section 1: \$75.7 % of Total Sales: 9%



Tier 1 Priority Issues: Executive Summary

State legislative session lengths and timing differ by state. Most states are in the first year of their 2-year biennium, which means some issues could remain unresolved until the end of 2020 even if they've adjourned for 2019.

Results from 1.1.2019 – 12.17.2019

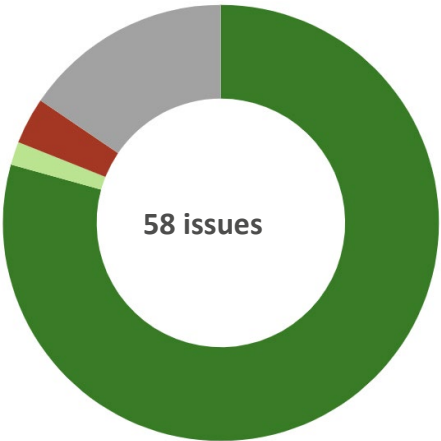
	win	gain	loss	unresolved / active
Privacy	46	1		
Data Security	57	1		
Tax	74	7		
Adult Beverage	12	6		
Scheduling Practices	18	1		3
Pay Ratio	3			
New Stores	29			

Tier 1 Priority Issues: Current Status & Results



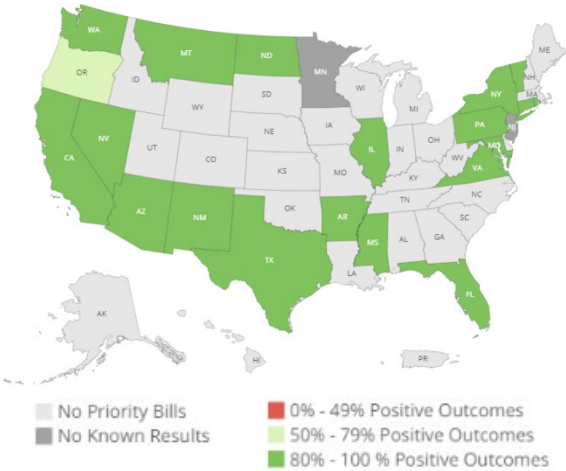
Privacy

Defeat comprehensive privacy legislation & defeat narrow proposals that dictate how we interact with guests or limit our ability to innovate.



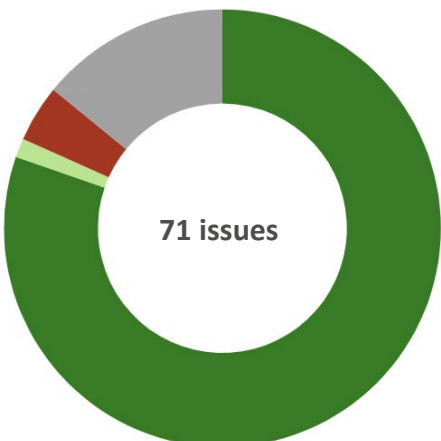
Highlights

- In CA, ...
- In WA, ...
- In IL, ...
- Looking ahead...



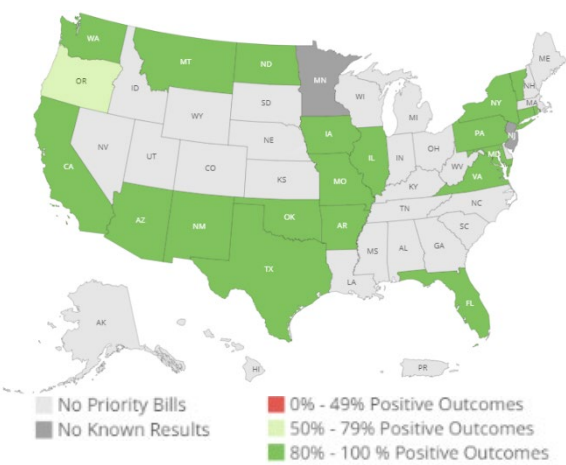
Data Security

Ensure new data security standards maintain alignment with other jurisdictions & limit state-by-state compliance burden.



Highlights

- In OR, ...
- In WA, ...
- In MO, ...
- Looking ahead...



Tool: Share ROI (Return on Investment)

- 1). When to Use It: If accurate data or estimates exists to support costs reduced/avoided or revenue created, then this method can be extremely useful.
- 2.) Advantages: Senior management understands ROI. Much of the time, however, public affairs teams lack data to prove ROI.

Example	Value Statement	Investment Required	Company Payback
Regulatory Advocacy to Gain Market Access	If the agency relaxes its interpretation of the law based on input from the company and our industry, we expect to expand our market sufficiently to boost revenue by 12%, assuming we capture our national average market share.	We will invest \$5 million to deliver this advocacy program in concert with our trade association. (Despite only a 60% probability of success this year, the payback potential of this initiative is sufficient to justify the cost and the risk.)	The decision to spend an extra \$1 million for research on the employment and tax revenue benefits of market expansion gave us the ammunition we needed to win the debate. And we still hit the 12% target and achieved a 9:1 payback.

Simple ROI

Value - Investment

Investment

Value	Total	PA Investment	Total
10,000	Tax credit	5,000	Travel cost
20,000	Revenue gained	5,000	Organizational memberships
40,000	Revenue protected	10,000	Consulting fees
	\$\$ awarded		Partnerships
10,000	Capital created		Sponsorships
80,000	Total	20,000	Total (+\$60,000)

ROI: +\$60,000 for -\$20,000

ROI 1:3

PA Investment	Total
Total	20,000



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