

Emergency Amended Source of Funding Regulations

At its August 9, 2016 meeting, the Joint Commission on Public Ethics (“Commission”) voted to approve a set of emergency amendments to its lobbyist and client source of funding disclosure regulations (19 NYCRR Part 938). The amendments were promulgated in order to comply with disclosure requirements in the ethics reform bill passed by the Legislature in June, and signed into law by the Governor on August 24, 2016. The changes in the law – and regulations – become effective on September 23, 2016.

The Commission is also commencing the formal rule making process for permanent adoption, which will include submission of the amendments to the State Register for public consideration and comment.

The Commission is seeking public comment through October 29th on the proposed amendments to its source of funding disclosure regulations.

[Click here to view the proposed regulations](#)

[Source of Funding Amendments FAQs](#)

Among the key changes in the regulations based on the legislation: (1) the threshold for disclosure of sources of funding by a lobbying entity was reduced from \$50,000 to \$15,000 in annual expenditures on lobbying (which must be at least three percent of the client’s total expenditures); and (2) whereas entities that met the threshold previously were required to disclose the sources of any funding contributions over \$5,000, they would now have to disclose the sources of contributions of \$2,500 or more.

The proposed regulations take effect on September 23, 2016.