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MORE ON THE FY 1984 BUDGET PROCESS

The budget for NEH is only one section of the Interior appropriations bills determined by House and Senate subcommittees with responsibility for the Endowment. Also included are budgets for the National Endowment for the Arts and the Institute of Museum Services. The following table shows comparative funding figures for FY 1983, FY 1984 Administration Proposal, House and Senate bills.

<table>
<thead>
<tr>
<th>FY '83 Approp. (in millions)</th>
<th>FY '84 Admin. Proposal</th>
<th>FY '84 House Approved</th>
<th>FY '84 Senate Bill</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Endowment for the Humanities</td>
<td>130.060</td>
<td>112.200</td>
<td>150.000</td>
</tr>
<tr>
<td>National Endowment for the Arts</td>
<td>143.875</td>
<td>125.000</td>
<td>165.000</td>
</tr>
<tr>
<td>Institute of Museum Services</td>
<td>11.520</td>
<td>11.520</td>
<td>21.500</td>
</tr>
</tbody>
</table>

These figures show that the Senate Interior Subcommittee determined to hold funding for FY 1984 and FY 1983 levels, but actually reduced the appropriation to NEH by $60,000 and to NEA by $875,000, while increasing the allocation to IMS by $2,630,000. Given the low Administration requests, the Senate bill is comparatively high, and leaves open the strong possibility that the final conference report will include an appropriation for NEH between $130,000,000 and $150,000,000, that is, somewhat higher than current level funding.

LOBBYING RULES REVISED, AGAIN

As the enclosed story from the New York Times reports, the Administration has drafted new rules that would drastically restrict lobbying by nonprofit organizations receiving funds from the federal government. The new rules would apply to direct lobbying, that is, when a federal grantee contacts a government official, and to indirect lobbying as well, when a grantee enlists others to contact government officials.

These revisions have been submitted, as promised, after a first attempt to revise lobbying regulations was withdrawn in the face of a deluge of criticism and protest from nonprofit groups and others (see G & PA mailings of February 25 and March 29). Originally, the revisions, proposed in the form of amendments to the Office of Management and Budget's Circular A-122, were designed to prevent the use of federal money for "political advocacy." The new revision has substituted "lobbying and related activities" for "political advocacy."

Under the new rules, costs of indirect lobbying at state and federal levels are "unallowable," applied both to lobbying designed to affect legislation or regulations. And, the federal government would not reimburse nonprofit organizations for meetings or conferences held largely to promote lobbying.

The Administration has said that the new regulations are not meant to cover military contractors or other profit-making organizations. Reaction to this distinction between nonprofit and profit-making organizations has focussed on the inherent political implications of such a differentiation. In the Times article, Senator David Durenberger (R-MN) is quoted as saying, "I find it disturbing to learn that the A-122 lobbying restrictions, originally to be applied to for-profit as well as nonprofit organizations, will only apply to nonprofit groups. I fear that many in Congress would otherwise support the O.M.B.'s initiative will be reluctant to endorse such reforms if they believe their impact has been narrowed for essentially political reasons."