

Building a Coalition to Advance Credit for Learning in Afterschool & Summer Learning Programs

Once the decision has been made to advocate for state-level policies that allow students to receive academic credit for work done in afterschool or summer learning programs, you will need to build support for such policies. In addition to developing legislative champions for the policies, and a media and social media outreach campaign, you should also consider forming a coalition of like-minded organizations you can work with to strengthen policymaker and public support. This resource walks you through the coalition building process.

What is a coalition?

A coalition is usually a union, temporary or more long-term, between at least two groups for the purpose of gaining more influence or power than the individual groups can achieve on their own. By focusing on common objectives and goals, member groups strengthen their influence and capacity on issues of common interest. Coalitions are especially well-suited to advancing a particular goal or objective, such as passing a piece of legislation. All partners should feel they benefit from being part of the coalition.

Why develop a coalition to advance credit for learning?

The primary reason for forming or joining a coalition is to gain more influence and power than the individual organization has on its own. Coalition strategies include combining resources, messages, and utilizing different messengers to advance a common goal. Organizations need to have a clear objective for forming a coalition, and many essential tactics should be considered when developing a coalition, such as using research, sharing information, mobilizing supporters, informing the public, advocating on an issue, raising funds, and more. With regard to credit for learning, a coalition can help flesh out the policy recommendation, build support for the idea among policymakers, secure legislative champions, and potentially minimize any misunderstandings or opposition.

Who might be good coalition partners on credit for learning?

Determine which organizations to reach out to and set up introductory calls with them. The following is not meant to be a comprehensive list but can provide a starting point for groups who may want to join you in advocating for credit for learning:

- **Afterschool providers and intermediaries.** Consider inviting statewide alliances of Boys & Girls Clubs, YMCAs, and other providers, as well as citywide afterschool intermediaries and/or individual afterschool programs to be part of a coalition. In particular, those organizations with experience in public advocacy may be good coalition partners.
- **Career and Technical Education (CTE)** advocates and programs also may see the connection between their career readiness work and the concept of achieving academic credit for work done out of school. CTE student groups like Future Farmers of America or Future Business Leaders of America may be interested.
- **Teacher unions.** State or local chapters of the American Federation of Teachers or the National Education Association are an important constituency to reach out to as well. These groups need to be assured that credit for work done in afterschool programs is complementary and supplementary to work done in classrooms during the school day. Certified teachers play an important role in credit for learning initiatives and therefore their professional and union organizations should be part of an advocacy coalition around this topic.
- **Education-related associations.** State or local associations of school principals, school administrators, school boards, and/or parent teacher organizations (PTO) are important groups that often have political capital at the state level and should be part of a coalition effort.
- **Parent advocacy groups.** In addition to PTOs, student or parent advocacy groups are another natural constituency for credit for learning work.
- **Business groups** including local and state chambers of commerce are engaged in career readiness and will likely see value in credit for learning done in afterschool programs that helps prepare young people for the workforce in the state.

Identifying types of nonprofits

Before deciding to work in coalition, organizations, particularly 501(c)(3) public charities, should have a basic understanding of the different types of nonprofits and the activities they can engage in. Below is a short snapshot of the common types of nonprofits.



Public Charities

The most common type of nonprofits, 501(c)(3)s are required to devote their resources to educational, religious, scientific, or other charitable purposes. 501(c)(3)s are permitted to engage in only limited lobbying activities and are prohibited from engaging in any political activity in support of or in opposition to a political candidate or party. Contributions to 501(c)(3)s are tax deductible. Private foundations are prohibited from lobbying in most situations.



Social Welfare Organizations

501(c)(4)s are social welfare organizations that exist to further the common good and general welfare of the people of the community. 501(c)(4)s can engage in unlimited lobbying activities and some limited political activities. Contributions to 501(c)(4)s are not tax deductible. 501(c)(4)s can be formed and dissolved quickly, so they may be an option for short-term goals.



Labor Organizations or Trade Associations

501(c)(5)s are labor organizations (unions) and 501(c)(6)s are business leagues or trade associations. The rules that apply to 501(c)(3) organizations when working with 501(c)(4)s are the same as when they work with 501(c)(5)s and 501(c)(6)s, so any references to coalition activities with 501(c)(4)s would also apply to work with 501(c)(5) and 501(c)(6) organizations.

Structuring a coalition

How a coalition is structured has a significant impact on the activities it can engage in, how it raises funds, and how it is managed. Typical coalition structures include:

- Informal working groups
- Coalitions operating under a fiscal sponsor arrangement
- Coalitions operating as independent 501(c)(3) organizations
- Coalitions operating as independent 501(c)(4) organizations



The goals of the coalition will help determine its structure. The following discussion covers the most common options for structuring a coalition.

- **Operating as an informal working group (ad hoc) coalition.** Not all coalitions need a formal structure. Organizations that want to work jointly on an issue can certainly work together without creating a formal organization or finding a fiscal sponsor. Just remember: if the coalition’s work includes lobbying activities, each organization needs to track its own lobbying.
- **Operating under a fiscal sponsor.** An informal coalition can also conduct its activities with another nonprofit, usually one of the coalition’s members, acting as a fiscal sponsor. The fiscal sponsor can be a 501(c)(3) or 501(c)(4), and will handle the coalition’s funds and serve as the administrative home. When using a fiscal sponsor, all of the coalition’s activities, including lobbying, will be treated as activities of the sponsor and reported on its annual 990 information return. If the coalition plans to engage in a significant amount of lobbying, a 501(c)(4) may be a better option for a fiscal sponsor, since 501(c)(3)s can engage in 501(c)(3)s are either private foundations, which generally provide grants, or public charities.
- **Operating as an independent 501(c)(4).** A coalition formed to advance a legislative goal or to work on a ballot initiative may decide to form a 501(c)(4) organization. 501(c)(4)s can engage in an unlimited amount of lobbying, but 501(c)(3)s that are part of a coalition structured as a 501(c)(4) still have to track how much of their own funds are used for lobbying and count that toward its own lobbying limit. Additionally, since 501(c)(4)s can engage in political activity, a 501(c)(3) partner must ensure its name and resources are not used for impermissible political activities.
- **Operating as an independent 501(c)(3).** It’s always easier to fundraise for a 501(c)(3) than a 501(c)(4) -so a coalition that plans to engage in a wide range of advocacy activities and only limited lobbying may find a 501(c)(3) structure more advantageous.

No matter what structure is chosen, coalition partners should have a clear understanding of each others’ obligations, how they will work together, and how resources will be used. A coalition that plans to engage in lobbying should also be aware of any state lobbying registration and reporting rules that are applicable. For more information, see [this tip sheet](#) on lobbying for nonprofits.

Tips to keep in mind for 501(c)(3)s in coalitions

Coalitions are great structures for organizations looking to work together and pool resources towards a common goal. When the organizations have the same tax-exempt status, few legal issues are likely to arise from this coordinated participation. However, when a 501(c)(3) participates in coalition with other types of organizations like 501(c)(4)s, 501(c)(5) unions, or 501(c)(6) trade associations, it is important to structure the coalition's activities so that they do not put the 501(c)(3) at risk. 501(c)(3)s can engage in a variety of advocacy activities, including lobbying within generous limits, but cannot support or oppose candidates running for public office. The other types of organizations listed above have an unlimited capacity to lobby and can engage in some partisan activity, so 501(c)(3)s need to make sure the coalition is not engaging in activities under the 501(c)(3)'s name or using its funds in ways that 501(c)(3)s cannot.

Here are three tips for 501(c)(3)s engaging in coalition work.

Tip #1: Moving resources from a 501(c)(4) to a 501(c)(3) is simpler from a legal standpoint than the opposite. It is much easier to move resources from a 501(c)(4) to a 501(c)(3) because a 501(c)(3) cannot subsidize a 501(c)(4). The same concern does not exist when a 501(c)(4) wants to provide resources to a 501(c)(3), since a 501(c)(4) can do everything a 501(c)(3) can do, and more. 501(c)(3)s have to ensure that their resources are not used for activities incompatible with their 501(c)(3) status, and should use a formal agreement if they move resources from their 501(c)(3) to a 501(c)(4).

Tip #2: Your tax-exempt status will follow you into your work with coalitions. Even if a 501(c)(3) is participating in a coalition organized as a 501(c)(4), a 501(c)(3) does not take on the tax status of its coalition partners. The 501(c)(3) still cannot participate in any 501(c)(3)-impermissible activities, like supporting or opposing candidates, and cannot exceed its lobbying limit. Similarly, any funds the 501(c)(3) provides to a

coalition remain 501(c)(3) funds that can only be used for 501(c)(3)-permissible activities. The 501(c)(3) should make sure its name or resources are not used for activities that may be permissible for 501(c)(4)s, but are prohibited for 501(c)(3)s.

Tip #3: Documentation is important. 501(c)(3)s can best protect themselves by entering into agreements with coalition partners that restrict the use of the 501(c)(3)'s funds and name to 501(c)(3) activities. Documentation showing how the coalition uses 501(c)(3) funds helps demonstrate that your organization's funds were not used for impermissible purposes. Other records like time sheets, grant agreements, reports and cost-sharing agreements can all show how 501(c)(3) resources were used in coalition activities. If a coalition is structured as a 501(c)(4), 501(c)(3) partners should document their activities so they can show they did not engage in 501(c)(3)-impermissible actions.

Putting it together: Funding the coalition

All coalitions need resources to accomplish their goals. Sometimes coalitions will operate without their own separate funds, and have members contribute resources of staff time and meeting space, but most will need some funding to pay for things like printing handouts, rally signs, or website maintenance. Coalitions that lobby may also need to pay fees in conjunction with reporting their lobbying activities.

Fees or dues. Many coalitions establish a membership fee to pay for its operating expenses. Some will base fees on the size and budget of the participating organization, so larger, better-funded organizations pay a higher fee than others. Some coalition participants may also have volunteers or specific experiences that add value to the coalition and allow an organization with scarce funds to provide a resource that is valuable to the coalition as a whole.

501(c)(3) organizations need to keep in mind that any dues or fees they pay that are used for lobbying expenditures will generally count toward the 501(c)(3)'s lobbying limit. If the coalition is structured as a 501(c)(4) organization, the best way for the 501(c)(3) to protect itself is to pay its dues through a grant agreement that restricts the use of the funds to 501(c)(3)-permissible purposes. A 501(c)(3) public charity can make a grant to a 501(c)(4) for lobbying, but the 501(c)(3) must specify how the funds will be used. A grant made by a 501(c)(3) to a 501(c)(4) to support a combination of direct and grassroots lobbying (both typical activities of coalitions that engage in advocacy) will count towards the 501(c)(3)'s grassroots lobbying limit, unless the grant terms specify which portion will be used for direct lobbying and which amounts can be applied toward grassroots lobbying. Grants should also require the 501(c)(4) to provide reports that specify how the funds were used and which activities were supported by the 501(c)(3) dues.

Foundation funding. Grants from public and private foundations are another source of funding for many organizations and coalitions. Foundations will often fund several different organizations to work jointly in an issue area, bringing together organizations to work in coalition towards its funding focus. The decision to seek foundation funding could impact how the coalition structures itself because it is much easier for foundations to fund 501(c)(3)s than 501(c)(4)s. A foundation is not likely to provide funding to a coalition unless the coalition is incorporated or conducts its work through a fiscal sponsor.

Raising funds from individual supporters or corporations. A coalition may also want to conduct a fundraising appeal directed to individuals or businesses. A coalition raising funds in its own name should check to see if they must register with their state before sending out a fundraising appeal. Charitable fundraising is regulated under state law, and each state has its own requirements. For information on state requirements on charitable solicitations see The National Council of Nonprofits' resources. A member of the coalition could also serve as a fiscal sponsor of the coalition and raise funds in its name, with any funds raised earmarked for coalition activities. This, too, could be regulated by state law, so before raising funds that will then be shared by multiple organizations, be sure to check to see if this activity must be reported under state law.