

(date)

Thomas A. Calcagni
Acting Director
New Jersey Division of Consumer Affairs
P.O. Box 45027
Newark, NJ 07101

Re: PPR 2011-001 - Disclosures to the Public

Dear Mr. Calcagni:

I am writing to express concern about PPR-2011-001, which would require charities that raise over \$250,000 in contributions to establish donor designation systems and inform donors that they may direct their gifts to specific programs mentioned in the solicitation.

Donors have always been able to restrict their gifts, and charities are bound to abide by those restrictions. This pre-proposal would go much further by actively encouraging donors to earmark their contributions. Fewer unrestricted dollars means less flexibility for an organization to respond to community needs or adapt to changing times.

Administrative and fund raising expenses are a necessary part of running a responsible, effective organization. They help to ensure accountability, financial and programmatic strength, and compliance with government policies. While seeking to minimize administrative and fund raising expense, this proposal will actually have the opposite effect, siphoning scarce resources away from programs and toward administrative and fund raising costs such as new solicitation materials, pledge cards, and increased accounting and bookkeeping costs to allocate the gifts.

This pre-proposal, although well-intentioned, is unnecessary and will actually make charities less able to serve the needs of their constituencies. Existing statutory protections and donor education will be far more effective in combating the problems this pre-proposal seeks to address.

Very truly yours,