Beware the Trojan Horse of Rulemaking Nongovernment Organizations

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THE BUCKEYE INSTITUTE

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Introduction

State policymakers confront a complex interplay of global markets, multinational conglomerates, federal and international rules, and the inherent responsibility to provide regulatory oversight that balances public safety and the freedom to conduct profitable business. Rulemaking is no easy task. Enter the well-meaning experts of nongovernmental organizations (NGO) to provide advice and guide policymakers through the regulatory labyrinth with model legislation and pre-packaged uniform rules ready to adopt. NGOs offer state agencies and lawmakers subject matter expertise, insight into the needs and preferences of regulated parties, and ready-made regulations waiting to be signed. But regulators and elected representatives should be wary of NGOs bearing gifts, and they would do well to remember the ancient lesson of Troy, so eager to accept the peace offering delivered to their city gates that they failed to detect the lethal threat hidden within the hollow Trojan Horse. NGOs offer standardized rules and market knowledge that make their counsel tempting to accept. But NGOs also operate opaquely, often with little public scrutiny, and their seemingly benign proposals can plant seeds of bureaucratic overreach and undermine state sovereignty with backdoor plans for default national agendas that bypass state protocols.

Ohio has a comparatively robust regulatory oversight structure with internal checks and balances designed to keep bureaucratic burdens at bay. And state policymakers have admirably and successfully pared back unnecessary regulatory restrictions without jeopardizing public safety. Those successes are well worth guarding. Given the Ohio Administrative Code's considerable reach, state officials should remain vigilant to ensure that new regulatory provisions and model rules are drafted in the light of day, not behind closed NGO doors. NGO-sponsored drafts should be publicly disclosed, vetted thoroughly, and never "auto-adopted" to ensure that they serve a broad public interest consistent with the state's expressed policy principles. Relationships between NGO staff and regulatory agency staff should be transparent, as should NGO spending and funding. NGOs should have their seat at the rulemaking table, but elected representatives accountable to the people should still make the rules—and inspect every offer from nongovernmental organizations carefully.

The Hidden Threat of Rulemaking NGOs

Popular nonprofit organizations like the Red Cross, humane societies, and various human rights organizations may be the most well-known NGOs today, but rulemaking NGOs have been developing model laws and regulations for well over 100 years. Originally intended to help bridge gaps between state policymakers and regulators, influential NGO-guided policy efforts have been underway since at least the late 19th century.

Specialized NGOs have been shaping regulations since the National Conference of Commissioners on Uniform States (now known as the Uniform Law Commission[1]) was established in 1892. Comprised of attorneys, judges, legislators, legislative staff, and other appointees, the commission pursues uniformity in state laws by developing model legislation for states to adopt.[2] The commission proposed the Uniform Commercial Code (UCC) in the 1940s, for example, to regulate commercial activity and interstate business transactions.[3] States began adopting the UCC in the 1950s, and it is now used by every state in the union.[4] As the 20th century unfolded, international trade accelerated, and technology advanced, NGO-led rulemaking efforts expanded and diversified. The American National Standards Institute (ANSI), founded in 1918,[5] became instrumental in coordinating voluntary consensus standards for products, services, and systems in the United States.[6] The post-war era gave rise to international NGOs focused on global rules and standards. The International Organization for Standardization, established in 1946, emerged as a leader in developing international standards across multiple sectors.[7] The International Accounting Standards Committee (now known as the International Accounting Standards Board) began developing multi-jurisdictional accounting standards in 1973 to facilitate international business operations.[8] Such efforts coincided with industry-specific NGO standard-setters

[1] **About Us**, uniformlaws.org (Last visited October 30, 2024).
[2] *Ibid.*
[3] **Uniform Commercial Code**, uniformlaws.org (Last visited October 30, 2024).
[4] *Ibid.*
[5] **About Us**, ansi.org (Last visited November 4, 2024).
[6] *Ibid.*
[7] **About ISO**, iso.org (Last visited November 4, 2024).
[8] **About the International Accounting Standards Committee (IASC)**, iasplus.com (Last visited November 4, 2024).

such as the Joint Commission on Accreditation of Healthcare Organizations,[9] the National Fire Protection Association (NFPA),[10] the North American Securities Administrators Association (NASAA), and the National Association of Insurance Commissioners (NAIC). NASAA, founded in 1919 and funded by a few state securities regulators to help develop consumer protection policies,[11] now includes securities regulators from every state, U.S. territory, Canada, and Mexico. NAIC started as a forum for state insurance regulators to coordinate their efforts in 1871,[12] and eventually helped shape national insurance policy and developed model rules for states to adopt after the Savings and Loan crisis in the 1980s. That crisis highlighted the need for a more robust, consistent regulatory framework, but as states adopted these rules, they soon resembled default federal regulation and NAIC's influence has continued to grow ever since.[13]

In an increasingly interconnected world, the rationale for NGO assistance remains commendable. NGO model standards typically offer more flexibility and responsiveness to technological changes and market needs than their governmental counterparts by providing informal "soft law" rules that help structure accountability and guide behavior in emerging industries.[14] Their subject matter expertise and input remains valuable and important for sound rulemaking. But state policymakers would be wise to be wary of the hidden risks residing in the proverbial belly of the nongovernmental Trojan Horse,[15] especially their latent potential to effect complex legislative and regulatory change without public awareness and accountability.

Some NGOs, for example, include government officials, regulators, and employees among their membership, while simultaneously lobbying at the state and federal levels.[16] Such NGOs hold a uniquely quasi-governmental agenda-setting position by which public officials craft model policies and lobby for their adoption without the proper transparency required of government agencies. Additionally, taxes and fees paid to government entities frequently make up a major portion of dues to some policy-oriented NGOs, creating potential conflicts of interest when regulated

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[9] **History of the Joint Commission**, jointcommission.org (Last visited November 4, 2024).
[10] **About Us**, nfpa.org (Last visited November 4, 2024).
[11] **Our Story**, nasaa.org (Last visited October 18, 2024).
[12] **The National Association of Insurance Commissioners (NAIC) to Celebrate 150th Anniversary**, National Association of Insurance Commissioners press release, January 14, 2021.
[13] **NAIC Model Laws 101**, content.naic.org, 2020.
[14] Rea S. Hederman, Jr. and Logan Kolas, ***A Healthcare World Reimagined: How Big Government Threatens Healthcare AI and What to Do About It***, The Buckeye Institute, April 1, 2024.
[15] *Ibid.*
[16] **Legislative Activity**, nasaa.org (Last visited November 5, 2024).

industries directly engage regulators outside the purview of relevant sunshine laws.[17] State lawmakers and regulators should be aware of such conflicted interests and exercise caution and due diligence when dealing with NGOs. Several recent examples highlight such concerns.

NASAA proposed expanding state-level regulations governing standards for securities brokers and dealers to exceed a new U.S. Securities and Exchange Commission (SEC) rule despite nationwide opposition from many business groups including the Ohio Chamber of Commerce.[18] Opponents argued that NASAA's model rule would conflict with federal regulations, create significant compliance challenges for firms operating across multiple jurisdictions,[19] and make it economically unfeasible for broker-dealers to serve certain investor segments, particularly those with smaller account balances.[20] Despite trade group and interested party opposition, the proposal could easily fly under the radar of state elected officials once it emerges from an NGO and filters out to states for adoption.

Similarly, NASAA proposed dramatically expanding state regulations well beyond related federal rules governing real estate investment trusts. That 2022 proposal raised eyebrows among industry groups representing commercial real estate investors[21] as the opening salvo for similar rules affecting a wide range of other alternative investment strategies. As written, the proposal could hamper investment in many different products across industries creating a new maze of red tape across states.[22] Nevertheless, despite industry, and some regulator opposition, the proposal was pushed in a NASAA committee chaired by the Ohio Commissioner of Securities.[23]

Recent trends in corporate "environmental, social, governance" (ESG) and "diversity, equity, and inclusion" (DEI) present other concerning examples of NGO influence. Historically beyond the scope of government regulation, ESG and DEI

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[17] Kevin P. Hennosy, **The NAIC's Peek-a-Boo Legal Status: Refusal to Comply with Open Meeting Requirements Brings NCOIL's Ire**, roughnotes.com, July 7, 2007.
[18] **Industry Groups Oppose New Advisor Best Practices Rule**, rethinking65.Com, December 7, 2023; and **Proposed Revisions to NASAA's Model Rule on Dishonest or Unethical Business Practices of Broker-Dealers and Agents dated September 5, 2023 (the "Proposal")**, uschamber.com, December 4, 2023.
[19] *Ibid.*
[20] *Ibid.*
[21] **The Roundtable Opposes NASAA Proposal Affecting REITS, Multifamily Industry, Capital Formation**, The Real Estate Roundtable press release, September 9, 2022.
[22] **Proposal Forecasts Greater Regulation of Alternative Assets,** Brownstein Hyatt Farber Schreck press release, August 31, 2022.
[23] **NASAA REIT Proposal**, Securities Industry, and Financial Markets Association press release, September 12, 2022.

policy preferences have been included in NGO regulatory models that would impose expensive carbon-emissions tracking requirements and burdensome diversity quotas on businesses.[24] NAIC, for example, is a founding member of the international NGO International Association of Insurance Supervision (IAIS), which has pushed ESG[25] and DEI[26] agendas at the policy level despite not being a regulatory body. Although states retain significant regulatory authority in these areas, close relationships between IAIS, NAIC, and state regulators, may affect state-level policy without raising the same public scrutiny that federal actions receive.

At the federal level, the SEC has already begun to embrace this framework,[27] and a recent interaction between the U.S. Department of Treasury's Federal Insurance Office (FIO) and NAIC illustrates another risk posed by the close ties between regulatory agencies and NGOs. FIO monitors all aspects of the U.S. insurance industry, including regulatory gaps that could result in a "systemic crisis."[28] FIO regulators initially sought a federal rule compelling property and casualty insurers to collect underwriting homeowners' insurance data to determine climate-related financial risk.[29] NAIC initially opposed the proposed rule[30] and its opposition had an impact.[31] But NAIC eventually acquiesced and agreed to collect "on behalf of participating state insurance regulators, ZIP Code-level data from the largest homeowners' insurers. FIO will be closely coordinating with the NAIC as the NAIC shares granular information with FIO in the coming months."[32] To avert a potential

[24] Allen Mendednhall and Daniel Sutter, "**ESG Investing: Government Push or Market Push**," *Santa Clara Journal of International Law*, Volume 22, Issue 2 (2024) p. 75-117; and Georg Kell, **The Remarkable Rise Of ESG**, *Forbes,* December 19, 2021.
[25] **Public consultation on climate risk supervisory guidance**, iaisweb.org, July 15, 2024.
[26] **Public consultation of Application Paper on supervising diversity, equity and inclusion – the governance, risk management and culture perspective**, iaisweb.org, November 24, 2024.
[27] Jon McGowan, **SEC Could Be Moving Toward Regulation Of DEI In The Financial Industry**, *Forbes*, October 13, 2023.
[28] **About FIO**, home.treasury.gov (Last visited October 31, 2024).
[29] **Treasury's Federal Insurance Office Advances First Insurance Data Call to Assess Climate-Related Financial Risk to Consumers**, U.S. Department of Treasury press release, November 1, 2023.
[30] **NAIC Responds to FIO's Climate-Related Financial Risk Data Collection Proposal**, NAIC press release, November 22, 2022.
[31] **The National Association of Insurance Commissioners (NAIC) to Celebrate 150th Anniversary**, NAIC press release, January 14, 2021.
[32] **U.S. Department of the Treasury and State Insurance Regulators Launch Coordinated Effort on Homeowners Insurance Data Collection to Assess the Effects of Climate Risk on U.S. Insurance Markets**, U.S. Department of Treasury press release, March 8, 2024.

mandate, NAIC will voluntarily provide the federal government with information that it otherwise might lack authority to obtain.[33]

Why NAIC recanted its initial opposition to FIO's proposed rule change remains unclear, as do many of its dealings.[34] According to an Internal Revenue Service (IRS) letter from December 1999, for example, NAIC does not have to file an IRS Form 990 like most nonprofit organizations.[35] Form 990 provides critical information about tax-exempt nonprofit organizations, including their mission statement, programmatic accomplishments, revenues, expenses, liabilities, organizational structure, officer and director compensation. Without filing a Form 990, NAIC enjoys a peculiar financial opacity for an entity with access to agency-level data without agency-type transparency or oversight, which raises concerns and breeds suspicion, especially as NAIC's budget has grown significantly in recent years.[36] And although NAIC obtains input from various stakeholders, its internal processes lack the public notice and comment protections required of government agencies; and they are not subject to direct oversight from elected federal or state officials. NAIC conducts business through committees that meet throughout the year and vote on proposals during scheduled meetings across the country, but major NAIC decisions are often made at "regulator-only sessions" that are closed to the public.[37] Ultimately, NAIC, an opaquely run NGO, exerts significant influence on insurance laws and regulations without public oversight or awareness.

Such opacity has allowed sophisticated state regulators with politicized agendas to advance restrictive regulations even when a majority of NGO members, industry stakeholders, and elected officials might not support them. This is why state policymakers should be mindful of the inherent risks before rolling such a Trojan gift horse inside the gates.

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33 **In PIA Victory, FIO Cancels Climate Data Collection Plan, Allowing NAIC to Lead Data Call**, The National Association of Professional Insurance Agents press release, March 8, 2024.
34 Allison Bell, **Consumer Advocate to NAIC: Open the Curtains**, Think Advisor, March 7, 2024.
35 **FAQ**, content.naic.org (Last visited October 18, 2024).
36 Daniel Schwarcz, "**Transparently Opaque: Understanding the Lack of Transparency in Insurance Consumer Protection**," *UCLA Law Review*, Volume 61 (2014), p. 394-462; and R.J. Lehman, **FIO, FOIA and a Free Market in Insurance Data**, R Street Institute, October 27, 2011.
37 Allison Bell, **Consumer Advocate to NAIC: Open the Curtains**, Think Advisor, March 7, 2024.

Ohio's Risky Relationships with NGOs

In Ohio, Chapter 119 of the Ohio Revised Code, which outlines rulemaking and notice and comment procedures, governs the state's interaction with rule- and standards-making NGOs.[38] This framework balances expert input and public participation and oversight, and mitigates some risk of NGO Trojan horses. The General Assembly's Joint Committee on Agency Rule and Review (JCARR) also provides legislative oversight of administrative rulemaking by reviewing newly promulgated agency rules, existing rules up for reauthorization, and rules ripe for agency recission.[39] JCARR's examinations ensure that rules do not exceed the scope of the promulgating agency's statutory authority, conflict with legislative intent, hurt businesses, or conflict with other laws or regulations.[40] JCARR may call for a resolution asking the General Assembly to invalidate any rule violating these policies.[41] In addition to legislative protections, Ohio Governor John Kasich issued an executive order in 2011 implementing the Common Sense Initiative (CSI) in the office of the lieutenant governor.[42] CSI assesses the business impact of existing and proposed regulations before JCARR's review so that state agencies can better balance regulatory objectives with likely economic effects.[43]

More recently, JCARR, CSI, and other Ohio policymakers have worked aggressively to lighten the state's regulatory burden[44] by enacting the most extensive occupational licensing reform legislation in the nation, establishing a comprehensive base-line inventory of every regulatory restriction across all state agencies, requiring a 30 percent reduction in regulatory restrictions over several years, and developing an online portal soliciting public feedback regarding regulatory problems.[45] But these successes are at risk if policymakers fail to appreciate and protect against the pernicious hidden threats soft-pedaled by agency regulators working closely with NGOs such as NASAA, NAIC, and NFPA.

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38 **Ohio Revised Code Chapter 119.**
39 **About**, jcarr.state.oh.us (Last visited October 7, 2024).
40 *Ibid.*
41 *Ibid.*
42 **CSI- Overview & History**, governor.ohio.gov (Last visited October 9, 2024).
43 *Ibid.*
44 *Ibid.*
45 Greg R. Lawson, ***Ohio: A Model for Regulatory Reform***, The Buckeye Institute, October 25, 2023.

North American Securities Administrators Association

The Ohio Commissioner of Securities has played many roles with NASAA for more than a decade, including a stint as the organization's president.[46] Currently, the commissioner serves as the NASAA representative to the SEC Advisory Committee, making her the principal liaison between state securities regulators and the SEC,[47] an important but little-known role. The commissioner faced some pushback in Ohio for the Ohio Department of Commerce's Division of Securities' attempt to implement NASAA policies without submitting to the normal JCARR process.[48] JCARR ordered the Division of Securities to restate those policies for formal rulemaking,[49] but there remains residual concern that the division will continue trying to adopt NASAA-preferred policies without JCARR review.[50] This egregious example of NGO subterfuge demonstrates why state legislators must remain vigilant in overseeing NGO-sponsored proposals.

National Association of Insurance Commissioners

The Ohio Department of Insurance (ODI) regulates the state's insurance industry.[51] Like many states, Ohio often adopts standards developed by NAIC and, as expected, state regulators and NAIC share a close working relationship. In 2024, ODI staff served on 22 NAIC committees or task forces, including as the chief of regulatory affairs and the chief examiner/analyst of risk assessment.[52] Such close interaction and information-sharing between top ODI management and NAIC benefits Ohio consumers and eases potential friction between multiple regulatory codes. But NAIC's non-transparent approach and lack of public or political oversight breed suspicion and should make policymakers mindful of Trojan Horse-type risks.

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[46] **Ohio Securities Commissioner Andrea Seidt to Lead NASAA**, North American Securities Administrators Association press release, October 8, 2013.

[47] **Andrea Seidt to Become NASAA's Representative on the SEC Investor Advisory Committee**, North American Securities Administrators Association press release, September 12, 2024.

[48] **Public Testimony**, jcarr.state.oh.us, December 12, 2022.

[49] **Minutes for the December 12, 2022 Meeting of the Joint Committee on Agency Rule Review**, jcarr.state.oh.us, December 12, 2022.

[50] **Testimony of the Institute for Portfolio Alternatives to the Joint Committee on Agency Rule Review Concerning Proposed Revisions to OAC 1301-6-3-09 (the "Proposal") of the Ohio Department of Commerce, Division of Securities**, jcarr.state.oh.us, August 14, 2023.

[51] **About Us**, insurance.ohio.gov (Last visited October 9, 2024).

[52] **Ohio Department of Insurance Selected for NAIC Leadership Roles**, Ohio Department of Insurance press release, February 1, 2024.

National Fire Protection Association & International Code Council

Ohio uses the National Electrical Code, developed by the NFPA and adopted by the Ohio Board of Building Standards, as the basis for its electrical regulations.[53] In developing the code, the NFPA received input from various stakeholders, industry professionals, and public safety officials.[54] The NFPA's standards-development procedure is relatively transparent, but legislators should still be aware of process[55] and the troublesome fact that the base electric code is not readily available for inspection and must be purchased from the NFPA rather than the state.[56]

Similarly, Ohio uses the International Plumbing Code, developed by the International Code Council (ICC) and adopted by the Ohio Board of Building Standards, as the basis for its plumbing regulations.[57] The plumbing industry provides expertise and valuable input to the ICC, but that expertise may not always align with broader public interests.

53 **Ohio Administrative Code 4101:1-27-01 (2024)**.
54 **List of Codes and Standards**, nfpa.org (Last visited October 30, 2024).
55 **The Standards Development Process**, nfpa.org (Last visited October 30, 2024).
56 **NFPA 70, National Electrical Code (NEC) (2023)**, nfpa.org (Last visited November 5, 2024).
57 **2024 Ohio Building, Mechanical & Plumbing Code Rules**, com.ohio.gov (Last visited October 30, 2024).

RECOMMENDATIONS FOR STATE POLICYMAKERS

NGOs may propose some rules that benefit the public and constituent sectors and businesses, but state elected officials accountable to voters—not special interest groups—must retain all rulemaking authority and directly oversee the regulatory approval process. State policymakers from every state should consider the following recommendations for maintaining and improving their oversight responsibilities.

State Government Regulator Transparency

Require state agency regulators to submit annual reports to the appropriate legislative committee outlining the following:

- Any funding received by regulators for travel or other expenses from NGOs with which they are affiliated;
- Travel and expense records for NGO-related events attended by regulators;
- A comprehensive list and description of votes taken by regulators on any model regulatory proposals before a relevant NGO committee on which they serve; and
- A comprehensive list and description of all NGO model proposals for which regulators subsequently lobbied.

Ensure state sunshine laws include all communications between state regulators and NGO staff.

Ensure NGOs Maintain Transparency

NGOs should be held to a high standard of transparency and issue publicly available annual reports. NAIC's failure to file an IRS 990 Form, for example, raises questions that can be answered by more thorough disclosures of all of the following:

- Sources of revenue;
- All expenditures, but especially any spending on lobbying to influence state or federal legislation or regulatory decisions;
- Staff salaries for the highest paid staff members;
- Governing documents, including conflict of interest policies; and
- Minutes of all voting sessions by all NGO committees and subcommittees, including roll call votes taken if state regulators serve on those committees.

State regulators should be prohibited from joining any NGO that does not meet this level of transparency.[58]

Enhanced Scrutiny of NGO-Inspired Model Regulations

Elected officials should always retain oversight of the rulemaking process and should never allow “automatic adoption” of NGO-drafted rules. Joint legislative committees like JCARR should implement a rigorous state-based review process for NGO-developed standards that goes beyond the review process for regulations designed by state agencies. Such a process should include an analysis of potential conflicts of interest based on NGO or participating regulator disclosures and impacts on public welfare. State law should especially prohibit automatic adoption of any rule developed by an NGO where state regulators serve in policymaking roles. And states should automatically invalidate any automatic adoption proposal that would bypass the normal rulemaking process and include financial penalties for violating that process.

State-Specific Modification of NGO Model Regulations

Some states like Ohio already do relatively well ensuring that rules are tailored to specific state needs, state policymakers must retain this ability to modify any broad-based and nationally focused NGO-sponsored proposals.

Expand Public Input

To balance national industry perspectives, state policymakers should use advisory committees to solicit more comprehensive input from additional stakeholders, including consumer advocacy groups, academic experts, and small businesses when agencies or legislatures consider any rule with a tie to an NGO.

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[58] If this prohibition were enacted only in Ohio, Ohio could be cut off from all the benefits of participation in NGOs and be unable to have its voice heard on important matters. Thus, it is important that a sufficient number of other states enact similar reforms.

Conclusion

NGOs play a significant but underappreciated role in shaping Ohio's regulatory landscape. They frequently provide indispensable expertise while promoting consistency across industries and states where varying regulatory structures could increase business and consumer costs. But NGOs are not publicly accountable bodies or subject to strict government oversight and thus can present a unique regulatory threat disguised as an innocuous Trojan gift horse. Despite some efforts to ensure transparency before promulgating NGO-sponsored regulatory suggestions and model codes, more reforms must ensure that NGO influence is known and balanced with vigorous legislative and public oversight. Given Ohio's successful regulatory reforms reducing unnecessary burdens over the last decade, state leaders should defend those successes and use the benefits offered by NGOs for public—not special interest—purposes. State policymakers would do well to remember the fateful lesson of Troy and beware of NGOs offering oversized policy advice.

Appendix: List of Acronyms

ANSI – American National Standards Institute

CSI – Common Sense Initiative

DEI – Diversity, Equity, and Inclusion

ESG – Environmental, Social, and Governance

FIO – Federal Insurance Office at the U.S. Department of Treasury

IAIS – International Association of Insurance Supervisors

ICC – International Code Council

IRS – Internal Revenue Service

JCARR – Joint Committee on Agency Rule and Review

NAIC- National Association of Insurance Commissioners

NASAA – North American Securities Administrators Association

NFPA – National Fire Protection Association

NGO – Nongovernmental Organization

ODI – Ohio Department of Insurance

SEC – U.S. Securities and Exchange Commission

UCC – Uniform Commercial Code

About the Author

Greg R. Lawson is a research fellow at The Buckeye Institute with expertise on Ohio's budget, local government, state and local taxes, education and education funding, transportation funding, and occupational licensing.

Lawson also serves as Buckeye's liaison to the state government policymakers where he educates policymakers in the legislative and executive branches on free-market solutions to Ohio's challenges. In this role, he is regularly called on to testify before legislative committees on policies that impact Ohio's families and the state's economy.

With nearly 20 years of experience working on 10 state budgets, Lawson is a recognized expert on Ohio's budget, and is the co-author of ***Principled Spending: Using Ohio's Capital Budget to Benefit Ohioans***. He has a deep knowledge of state and local taxes, and how Ohio funds Medicaid, education, and transportation. He is the author of the *Piglet Book*, The Buckeye Institute's biennial publication outlining areas of government waste.

A recognized expert in the school choice movement and on occupational licensing, Lawson is the co-author of ***Education Savings Accounts: Expanding Education Options for Ohio*** and ***Still Forbidden to Succeed: The Negative Effects of Occupational Licensing on Ohio's Workforce***. Lawson is also the author on several reports dealing with local government funding and reform, including, ***Revenue Sharing Reform: On the Road to Ohio's Recovery*** and ***Joining Forces: Rethinking Ohio's Government Structure***.

Prior to his position at Buckeye, Lawson served in the Ohio General Assembly as a Legislative Service Commission fellow. He then went on to several government affairs roles focusing on numerous public policy topics, including Medicaid, school choice, transportation funding, and Ohio's Building Code. He also has a background in fundraising, grassroots organizing, and communications and served on the boards of two Columbus-based charter schools.

Lawson is a frequent speaker across the state of Ohio and is regularly quoted in media outlets throughout the state. His writings have appeared in most major Ohio newspapers including *The Cincinnati Enquirer, The Plain Dealer,* and *The Columbus Dispatch*, as well as national publications including *Forbes*. He also regularly provides commentary on policy and Ohio's political landscape on Ohio's premier public affairs programs.

THE BUCKEYE INSTITUTE
88 East Broad Street, Suite 1300
Columbus, Ohio 43215
(614) 224-4422
BuckeyeInstitute.org