



November 29, 2007

The Honorable Chuck Grassley  
135 Hart Senate Office Building  
Washington DC 20510-1501

Dear Senator Grassley:

National Religious Broadcasters (NRB) is the preeminent organization representing the interests of Christian broadcasters and electronic communicators. As such, we have watched with great interest, and some concern, your recent investigation into six religious ministries. The Senate Committee on Finance characterized your investigation as one that focused on these ministries as being “media-based.” Although *none* of these six ministries are members of our organization, the fact that they are religious broadcasters makes this an issue of great significance for us.

Let me be quick to point out, Senator, that for all but our smaller broadcasters, membership in NRB is conditioned upon an applicant joining the Evangelical Council for Financial Accountability (ECFA). NRB believes in, and encourages our members to practice, biblical precepts of financial stewardship and vigorous standards of financial transparency. As a matter of principle, we were saddened that you had deemed it necessary to formally investigate these various ministries as a function of your position as Ranking Member of the Senate Committee on Finance. We obviously have no personal information regarding the finances or the operations of these six organizations. But we are concerned about the broader implications of this issue, not only for our members, but for all non-profit Christian ministries as well.

We are aware of your statements in several press reports to the effect that you are interested only in tax compliance by religious non-profit groups, and not their religious doctrine. While we are pleased with those expressed intentions, the breadth of the information requested by your office gives us considerable pause. As an example, in your letter to Randy and Paula White you requested the names of all persons in attendance at all board meetings for a three year period. Such information goes far beyond a mere request for financial records necessary to scrutinize the charitable nature of the organization’s operations.

In that same letter, you also asked for copies of “compensation recommendations” and the names and addresses of each person who provided those

National  
Religious  
Broadcasters

9510 Technology Drive  
Manassas, Virginia 20110  
Phone: 703-330-7000  
Fax: 703-330-7100

Capitol Hill Office:  
900 2nd Street, NE  
Suite 216  
Washington, DC 20002  
Phone: 202-543-0073

[www.nrb.org](http://www.nrb.org)

[info@nrb.org](mailto:info@nrb.org)

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Communicators  
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recommendations. Unfortunately, your letter did *not* invite the recipients to redact any theological or doctrinal discussions that those recommendations may have included on the issue of suitable compensation. Christian ministries regularly have to determine what is appropriate compensation for ministry leaders, and often their discussions on that subject are saturated with biblical and spiritual analysis and staff opinions of a very personal nature. Yet, in that letter demand, no effort was made to avoid forcing, into the public, those kinds of sensitive, internal conversations of a religious ministry.

Likewise, a request was also made in that same letter for copies of written employment contracts, and copies of all board minutes for a three year period. Such documents could well include internal communications of a religious ministry on matters of spiritual governance, or other subjects as to which the First Amendment Religion Clauses provides protection from government surveillance, and intrusion. If one of our members were asked to produce information of this sweeping and broad nature, we would have legitimate concerns that the “excessive entanglement” element of the Establishment Clause had been overstepped.

We certainly respect your diligence in desiring to enforce existing tax law, including those applicable to non-profit organizations. However, we would heartily invite you to collaborate with National Religious Broadcasters in the future if this investigation into the six individual media ministries is expanded into any broader inquiry, or if there is any consideration given to new regulations or legislative initiatives that could impact non-profit Christian broadcasters and other religious organizations. We believe that such a collaboration with NRB could yield considerable benefit for all concerned.

Sincerely,



Frank Wright, Ph.D.  
President and CEO