

# **SELF-HELP CLIMATE CAPITAL, LLC**

#### REQUEST FOR PROPOSAL FOR ELECTRIC VEHICLE LOAN SALES

Revised: February 14, 2025 First Posted: *December 9, 2024* 

# Electric Vehicle (EV) Loan Sales RFP #1 Ongoing Solicitation

#### 1. GENERAL INFORMATION.

A. **Opportunity & Overview.** Self-Help Climate Capital, LLC ("SHCC") seeks to identify potential qualified sellers of Electric Vehicle (EV) Loans (defined in the Appendix) as further described below to originate and sell EV Loans on a forward-flow basis to SHCC.

This Request for Proposal ("RFP") will remain open on a rolling basis and responses (each a "Proposal") will be evaluated as set forth in Section 4 Proposal Evaluation below. For the purposes of this RFP, parties responding to this RFP are referred to as "Proposer" or "you".

Proposals must be submitted electronically in accordance with Section 4 below.

B. **Background**. SHCC is a subrecipient of an award under the Environmental Protection Agency's ("EPA") National Clean Investment Fund ("NCIF") grant competition of the Greenhouse Gas Reduction Fund ("GGRF").

The NCIF is a provision of the Inflation Reduction Act focused on ensuring the clean energy transition brings direct, tangible benefits to all Americans, with a focus on low-income and disadvantaged communities ("LIDAC," defined in Appendix). It has three program objectives: 1) reduce greenhouse gas emissions and other forms of air pollutants, 2) bring direct benefits to American communities in the form of energy security, energy savings, cleaner air, and quality jobs, and 3) transform the capital markets so they can drive an equitable clean energy transition at scale.

SHCC is a coalition partner of Climate United Fund ("CUF"), the 501(c)(3) awardee under NCIF. SHCC is wholly owned by Self-Help Ventures Fund, a 501(c)(3) nonprofit organization that is a certified community development financial institution.

To learn more about the Climate United coalition and approach, please visit <a href="https://www.weareclimateunited.org">www.weareclimateunited.org</a>.

C. **Purpose.** SHCC seeks to support increased lending, to Low-Income and Disadvantaged Communities, for automotive purchase lenders that have capabilities to originate and deliver EV Loans with collateral that reduces greenhouse gas emissions. SHCC seeks potential counterparties to submit Proposals to originate EV Loans at below market rates and/or with more flexible underwriting criteria than prevailing market terms ("Program Subsidy," further defined in Appendix) and sell them on a forward-flow basis to SHCC.

Proposers seeking to retain the servicing of their loan originations will be considered and must provide additional information in the Proposal. Proposers who seek to release the servicing of their loan originations will also be considered, but do not need to provide additional servicing information.

In the potential EV Loan transactions, SHCC expects to use proceeds from NCIF (through its subaward from CUF) to pay for the purchase of eligible EV Loans and related fees in accordance with any terms of such subaward. Through this RFP, SHCC is procuring for the purchase and servicing of EV Loans in adherence with the requirements set forth in 2 CFR § 200.317 et seq.; EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment; and all other applicable requirements.

D. **Limitation.** SHCC reserves the right to (a) reject any or all Proposals without explanation, (b) waive technicalities or irregularities, (c) request additional information from any Proposer (including a list of client references), (d) withdraw or revise this RFP at any time, (e) make such selection deemed in its best interest (in SHCC's sole and exclusive discretion), and/or (f) enter into due diligence discussions with multiple successful Proposers. Upon completion of due diligence review, SHCC may negotiate individual contracts with certain selected Proposers following counterparty review and based on program fit, not necessarily the lowest pricing.

The issuance of this RFP does not commit SHCC to participate in any transaction, proceed to negotiate any terms or definitive documentation, pay any costs incurred in preparing a Proposal or to procure or contract for services or supplies. The selection of your Proposal under this RFP does not commit SHCC to enter into an agreement or conduct or expand business with any Proposer even if all the requirements are met.

- 2. **SCOPE OF SERVICES.** Proposer must be able to provide SHCC with the following services:
  - A. Support SHCC goals to provide energy and cost savings to Borrowers (defined in the Appendix) primarily in Low-Income and Disadvantaged Communities as well as "Rural" and "Tribal" (defined in Appendix) areas by originating fixed-rate, affordable, EV Loans for the purchase of new and used EVs.
  - B. Sell the Eligible EV Loans to SHCC on a forward-flow basis.
  - C. Provide SHCC all required origination, delivery, and energy-efficiency eligibility and reporting data.
  - D. Service the Eligible EV Loans or transfer servicing following an interim servicing period to a specialty servicer of SHCC's choice (following SHCC requirements). SHCC will consider two possible servicing arrangements:
    - 1) The Proposer retains the full servicing rights of their loan originations.
    - 2) The Proposer sells the loans servicing-released and transfers to a servicer selected by SHCC.

For option 1 above, the Proposer must provide additional information in the Proposal as set forth in section 3.

- 3. **PROPOSAL CONTENTS.** The Proposer in its Proposal shall clearly and concisely respond to each of the following (referencing the appropriate A-J sub-section). Failure to respond to a topic may render the Proposal incomplete and SHCC reserves the right, in its sole discretion, to either contact Proposer to request supplementation of the Proposal or refuse to consider or evaluate the incomplete Proposal.
  - A. **Experience**. The Proposer should concisely describe its qualifications and experience related to the areas outlined in the Scope of Services in section 2. A.-E. above and Qualifications in subsection 3.
    - D. below. Proposal should also include the following:
      - Detail your organization's experience with lending to diverse, LIDAC, Rural and/or Tribal communities
      - If your organization has experience with EV lending programs, detail those lending activities
      - Proposers intending to retain servicing or serve as a sub-servicer on the EV Loans must provide detail on your experience servicing auto loans, including any experience servicing auto loans to low-income borrowers and/or underserved communities
  - B. **Approach**. The Proposer should briefly describe its approach to accomplishing the Scope of Services above, including but not limited to the following:
    - Describe approach for entering the EV Lending market, if no previous experience
    - Describe approach to reaching LIDAC borrowers for EV lending, with an emphasis on LIDAC borrowers who qualify under section c of the LIDAC definition in the Appendix
    - Describe approach to reaching Rural and/or Tribal communities, if applicable
    - Specify the preferred servicing option(s) as described in Section 2
    - Describe any partnerships or alliances you plan to use in accomplishing any of the above
    - Describe approach to executing sales of loans to SHCC
  - C. **Organization, Size, Structure**. The Proposer should briefly describe its organization in terms of the following:
    - Annual auto origination volume for the last three years, breaking out EV Loans as a subset, including:
      - Distribution by state
      - O Distribution by borrower qualifying income compared to area-median income (<80.01%; 80.01-100%; 100.01-120%, 120.01-140%, >140%)
    - If you are proposing to retain servicing of the originated loans, detail your servicing volume, other investor servicing volume, and current servicing system

SHCC encourages the participation of businesses owned by people of color, women, and persons with disabilities in the implementation and execution of all projects, either on a direct basis or though sub-contracting efforts.

Please confirm whether you are aware of any actual or apparent conflict of interest arising from this proposed engagement (including any conflicts described in 2 CFR § 200.318(c)).

D. **Qualifications.** If not already described in sections A-C, document how you meet the following qualifications:

## **Minimum Qualifications:**

- Demonstrated EV lending experience or credible ability to enter the market
- Ability to service EV Loans, or ability to transfer servicing to a provider chosen by SHCC
- Flexibility to use a document custodian of SHCC's choosing
- Ability to participate in and provide documentation for internal and external audits as well as counterparty evaluations
- Ability to deliver data and reports, including but not limited to the following:
  - Borrower information
  - o Loan terms
  - Vehicle information

#### **Preferred Qualifications:**

- Capacity to deliver a minimum of \$10 million of EV Loan volume annually
- Experience originating auto loans to low-income borrowers and/or underserved communities
- Ability to create custom workflows and branding for lead referral partners
- Ability to provide pre- and post-purchase services to EV buyers. For example: monthly
  payment cost calculator; summary of federal, state, local, and utility Incentives; incentive
  qualification screening; incentive application tools; EV selection tools; EV savings
  estimation tools; EV inventory search tools; 3<sup>rd</sup> party incentive point of purchase support
- E. **Pricing**. Describe expectations of EV Loan origination income including standard ancillary fees, origination fees, and premiums on loan sale to SHCC. Describe expectations for compensation related to servicing rights or servicing fees. Provide your most competitive pricing, income, and fee structure.
- F. **Cybersecurity and Breaches**. The Proposer should disclose and concisely describe its cybersecurity policies and procedures to protect client data. If the Proposer has suffered any known cyberattacks or breaches, please describe the event and the organization's response and remedial actions taken. Please include a copy of your Data Privacy and Cybersecurity Policy.
- G. **Insurance**. Describe the levels of coverage for liability insurance, cyber insurance, errors and omissions insurance, Directors and Officers insurance, fidelity bond insurance, and any other relevant insurance your organization maintains.
- H. Debarment or Suspension. Confirm that neither your organization nor any individual who will be acting as a Principal on any contract entered as a result of this RFP has been debarred or suspended from, or is ineligible for participation in, any Federal assistance program. EPA's definition of Principal can be found at 2 CFR 1532.995.

- I. **Contact Information**. The Proposer should include the name, title, mailing address, email address, and telephone number for the primary point of contact of the Proposer.
- J. **Proposal Attestations and Attachments**. All responses must be signed by an individual authorized to legally represent the organization, and signatures must be an electronic image of a wet ink signature (such as a PDF) or a digital signature. All responses must include the following attachments:
  - a. Attachment A Certification of Diligence, Accuracy, and Completeness
  - b. Attachment B Certificate of Independent Price Determination
  - c. Attachment C Byrd Anti-Lobbying Certification

#### 4. PROPOSAL EVALUATION

A. **Submission of Proposals**. You must submit any Proposal, including all supporting documentation, electronically in a single PDF of 50 pages or less, plus required attachments to this email address: NCIFProcurement@self-help.org

Proposals must address each topic described in Section 3 and include the RFP name in the subject line of the submission email.

SHCC is not responsible for electronic files that cannot be opened or corrupted files. If files cannot be opened, SHCC reserves the right (but does not have the obligation) to contact the Proposer and take reasonable measures to receive an openable file. By submitting information, the Proposer represents that they have read and clearly understand this RFP and are capable of providing the required services.

All costs incurred in the preparation of a Proposal responding to this RFP and/or participating in any interview process will be the responsibility of the Proposer and will not be reimbursed.

- B. **Evaluation Procedure and Criteria**. SHCC will review Proposals on a rolling basis as received against initial criteria, including the following in a general order of priority. Adjustments to priorities can be made on a case-by-case basis depending on the needs of SHCC, LIDAC borrowers, and the portfolio of loan origination partners over time:
  - Pricing and terms for loan origination and servicing including set-up fees, maintenance fees, transaction fees, reporting fees, and any other fees.
  - Completeness of solution including additional services provided to the borrower in the EV purchasing process, customization of lending platform for various partners, and reporting capabilities
  - Prior relevant experience and ability to execute the proposed EV loan program
    - Prior relevant experience with EV and LIDAC borrowers (with a preference for LIDAC borrowers qualifying under subsection c in the definition set forth in the Appendix), Rural, or Tribal lending including balloon payment loans
    - o Ability to implement custom loan terms and underwriting criteria for this program
    - Annual EV Loan origination volume and geographic footprint
  - Proposed approach to scope of work including a description of what work will be required by SHCC, what 3<sup>rd</sup> party services and integration will be required, ability to scale, and how you will handle updates and changes over time.

- Loan servicing capability, if applicable
- Completeness of response to the RFP

SHCC will review all Proposals against the evaluation metrics set forth above, and based on that review, may select a smaller number of Proposals for further counterparty review. Any scoring of evaluation metrics is subject to correction upon discovery or disclosure of additional or clarifying information.

All Proposals must comply with all EPA procurement rules and guidelines. All responses must be presented economically and efficiently. SHCC may request additional due diligence materials and interviews with the proposed lender as part of the selection process. SHCC's decision regarding this RFP will be final and not subject to review.

C. Terms of Engagement. SHCC intends for this RFP to result in the selected Proposers becoming eligible for a more comprehensive counterparty review, possible negotiation, and execution of a written agreement with SHCC. Proposers must be amenable to including in a contract any information provided in its response to this RFP or developed subsequently during the selection process.

Any such agreements with the selected Proposers will (a) be contract agreements, not subrecipient agreements, (b) comply with the requirements set forth in Appendix II to 2 CFR Part 200 – Contract Provisions for Non-Federal Entity Contracts under Federal Awards (2 CFR § 200.327) and in Appendix A to 40 CFR Part 33 (40 CFR § 33.106), as applicable, (c) include terms and conditions required by the EPA, and (d) be for a term of one year, with option for annual renewals, or as otherwise mutually agreed.

Proposers acknowledge that this RFP is issued in connection with the EPA's NCIF grant competition of the GGRF and will be supported by Federal funds, and that selected Proposers agree to be bound by all applicable federal, state, and local laws, regulations, and any and all EPA required terms and conditions incorporated into any contract(s) awarded.

D. **Timeline**. This Request for Proposal will remain open, and responses will be evaluated on a rolling basis as received to ensure all interested parties have an opportunity to propose transactions as market needs develop and change over time. This RFP will remain open at least thirty (30) days from the date of initial posting.

#### 5. QUESTIONS AND CONTACT INFORMATION

Please submit any questions concerning this RFP and include the name of the RFP in the subject line, to the following email address:

NCIFProcurement@self-help.org.

Direct communication about the content of this RFP will be limited. If appropriate, and for clear and consistent communication, the question (without identification of the questioner) and its answer may be posted to the FAQ on our website here: <a href="https://www.self-help.org/who-we-are/resources/current-proposal-requests">https://www.self-help.org/who-we-are/resources/current-proposal-requests</a>

SHCC reserves the right not to respond to all questions. Each Proposer is responsible for requesting further explanation, if they do not fully understand or believe the information contained herein could be interpreted in more than one way.

SHCC looks forward to receiving your Proposal.

#### **APPENDIX: DEFINITIONS**

The definitions set forth below reflect those terms currently defined by EPA and/or CUF but may be subject to revision. Please note that some of these definitions (or portions thereof) may not be relevant for the potential transactions solicited under this RFP.

Electric Vehicle (EV): Battery Electric Vehicle (BEV) or Plug-in Hybrid Vehicle (PHEV) consistent with EO 14037 (Strengthening American Leadership in Clean Cars and Trucks) and The U.S. National Blueprint for Transportation Decarbonization.

**Electric Vehicle Loan (EV Loan):** A loan or balloon payment loan for an EV meeting the loan terms and underwriting criteria specified by SHCC.

Borrower: NCIF program participant benefiting from the SHCC loan program to purchase an EV.

Low-Income and Disadvantaged Communities (LIDAC): Section 134(a)(3) of the Clean Air Act appropriates funds "for the purposes of providing financial assistance and technical assistance in low-income and disadvantaged communities." Low-Income and Disadvantaged Communities means CEJST-Identified Disadvantaged Communities, EJScreen-Identified Disadvantaged Communities, Geographically Dispersed Low-Income Households, and Properties Providing Affordable Housing, and Federally Recognized Tribal Entities, as defined below.

- a. **CEJST-Identified Disadvantaged Communities:** All communities identified as disadvantaged through version 1.0 of the Climate and Economic Justice Screening Tool (CEJST), released on November 22, 2022, which includes census tracts that meet the thresholds for at least one of the tool's categories of burden and land within the boundaries of Federally Recognized Tribes.
- b. **EJScreen-Identified Disadvantaged Communities:** All communities within version 2.2 of EJScreen that fall within either (a) the limited supplemental set of census block groups that are at or above the 90th percentile for any of EJScreen's supplemental indexes when compared to the nation or state or (b) geographic areas within Tribal lands as included in EJScreen, which includes the following Tribal lands: Alaska Native Allotments, Alaska Native Villages, American Indian Reservations, American Indian Off-reservation Trust Lands, and Oklahoma Tribal Statistical Areas.
- c. Geographically Dispersed Low-Income Households: Low-income individuals and households living in Metropolitan Areas with incomes not more than 80% AMI or 200% FPL (whichever is higher), and low-income individuals and households living in Non-Metropolitan Areas with incomes not more than 80% AMI, 200% FPL, or 80% Statewide Non-Metropolitan Area AMI (whichever is highest). Federal Poverty Level (FPL) is defined using the latest publicly available figures from the U.S. Department of Health and Human Services. Area Median Income (AMI) is defined using the latest publicly available figures from the U.S. Department of Housing and Urban Development (HUD). Metropolitan Area and Non-Metropolitan Area are defined using the latest publicly available figures for county-level designations from the Office of Management and Budget. Statewide Non-Metropolitan Area AMI is defined using the latest publicly available figures from the U.S. Department of the Treasury's CDFI Fund, with an adjustment for household size using HUD's Family Size Adjustment factor.
- d. **Properties Providing Affordable Housing:** Properties providing affordable housing that fall within either of the following two categories: (a) multifamily housing with rents not exceeding 30% of 80%

AMI for at least half of residential units and with an active affordability covenant from one of the following federal or state housing assistance programs: (1) Low-Income Housing Tax Credit; (2) a housing assistance program administered by HUD, including Public Housing, Section 8 Project-Based Rental Assistance, Section 202 Housing for the Elderly, Section 811 Housing for Disabled, Housing Trust Fund, Home Investment Partnership Program Affordable Rental and Homeowner Units, Permanent Supportive Housing, and other programs focused on ending homelessness that are funded under HUD's Continuum of Care Program; (3) a housing assistance program administered by USDA under Title V of the Housing Act of 1949, including under Sections 514 and 515; or (4) a housing assistance program administered by a tribally designated housing entity, as defined in Section 4(22) of the Native American Housing Assistance and Self-Determination Act of 1996 (25 USC § 4103(22)); or (5) a housing assistance program administered by the Department of Hawaiian Homelands as defined in Title VIII of the Native American Housing Assistance and Self-Determination Act of 1996 (24 CFR 1006.10) or (b) naturally-occurring (unsubsidized) affordable housing with rents not exceeding 30% of 80% AMI for at least half of residential units.

e. **Federally Recognized Tribal Entities:** All Federally Recognized Tribal entities, which are considered disadvantaged regardless of whether a Federally Recognized Tribe has land, consistent with M-23-09 and CEJST.

#### Rural areas:

A rural area is defined as any one of the following:

- Projects that benefit rural areas or towns outside of urban areas. Per the 2020 Census, an urban area is densely settled core of census blocks that encompasses at least 2,000 housing units or has a population of at least 5,000. [https://www.census.gov/programs-surveys/geography/quidance/geo-areas/urban-rural.html]
- Projects that are outside of a metro service area including all non-metro counties per the 2020 Office of Management and Budget (OMB).
  [https://www.census.gov/programs-surveys/metro-micro.html]
- Projects that are outside of a metro service area including all metro census tracts with Rural-Urban Commuting Area (RUCA) codes 4-10 per the USDA's 2010 RUCA dataset. Note: Dataset may be subject to update when 2020 RUCA codes are released. [https://www.ers.usda.gov/data-products/rural-urban-commuting-area-codes/]
- Projects that are outside of a metro service area including large area Metro census tracts of at least 400 sq. miles in area with population density of 35 or less per sq. mile with Rural-Urban Commuting Area (RUCA) codes 2-3 per the USDA's 2010 RUCA dataset. Note: Dataset may be subject to update when 2020 RUCA codes are released.
  - [https://www.ers.usda.gov/data-products/rural-urban-commuting-area-codes/]

#### Tribal:

- A property located in a Native Lands Area (NLA) according to the new Community
  Reinvestment Act guidance or located on Hawaiian Home Lands as designated under the
  federal Hawaiian Homes Commission Act of 1920.
- Borrower(s) that are members of a state- or federally-recognized tribe, members of a homestead beneficiary association as defined in 43 CFR 47.6, or shareholders of an Alaska Native Regional or Village Corporation.

# **ATTACHMENT A - CERTIFICATION OF DILIGENCE, ACCURACY, AND COMPLETENESS**

## **CERTIFICATION OF DILIGENCE, ACCURACY, AND COMPLETENESS**

On be	ehalf of	, [OB.]
	ehalf of(Name of Organization)	
l,	(Your Full Name), hereby certify that	t I have exercised due
_	nce in the preparation of the response to this Request for Proposa	• •
regar	d to the Proposal include and incorporate all of the Attachments the	nereto.
To the	e best of my knowledge and belief:	
i.	The information provided in the Proposal is accurate and reflect capabilities, qualifications, and offerings.	s the current state of our
ii.	I have thoroughly reviewed and ensured the completeness of all attachments and supporting materials.	required documents, including
iii.	All statements made in the Proposal are truthful, and there is no requesting entity.	intent to deceive or mislead the
iv.	The Proposal complies with all guidelines, specifications, and rec documentation.	quirements outlined in this RFP
٧.	I have authority to sign on behalf of and bind the above-named	organization.
	erstand the importance of the accuracy and completeness of this soviding any additional information or clarification if requested.	ubmission, and I am committed
Name	e of Organization:	
Signat	ture:	
Name	e:	
Title:		<u></u>
D-4		

SIGN AND RETURN THIS FORM WITH YOUR PROPOSAL SUBMISSION

# <u>ATTACHMENT B - CERTIFICATE OF INDEPENDENT PRICE DETERMINATION<sup>1</sup></u>

## CERTIFICATE OF INDEPENDENT PRICE DETERMINATION

On behalf of	[6B] - [6B]
	lame of Organization)
l,	, hereby certify, under penalty of perjury and to
(Your Full Name) the best of my knowledge and be	
the best of my knowledge and be	ner, that.
independently, without collusion competitor or potential competi	submitted in response to the Request for Proposal (RFP) are arrived at on, consultation, communication, or agreement with any other cor. Any non-public pricing information in this Proposal has not been ed by us, directly or indirectly, to any other competitor contract award.
-	be made by us to induce any other organization or individual to submit e purpose of restricting competition.
The prices quoted are based sole specified in the RFP.	y on our independent judgment and analysis of the requirements
We have not received any inform our Proposal.	ation from the requesting entity that would affect the prices quoted ir
We are not aware of any actions integrity of the procurement pro	or omissions that would impair the fairness of the competition or the cess.
disqualification from consideration	ertification and acknowledge that any false statement may lead to on and potential legal consequences. I am responsible for determining P response, and I have not participated and will not participate in any ns set forth above.
Name of Organization:	
Signature:	
Name:	
Title:	
Date:	
SIGN AND RETU	JRN THIS FORM WITH YOUR PROPOSAL SUBMISSION

<sup>1</sup>48 CFR § 52.203-2.

### ATTACHMENT C - BYRD ANTI-LOBBYING CERTIFICATION<sup>2</sup>

The undersigned certifies, to the best of his or her knowledge and belief, that:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities", in accordance with its instructions.
- 3. The undersigned shall require that the language of this certification be included in the award documents of all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

The responding organization listed below certifies or affirms the truthfulness and accuracy of each statement of its certification and disclosure, if any. In addition, the responding organization understands and agrees that the provisions of 31 U.S.C. Chap. 38, Administrative Remedies for False Claims and Statements, apply to this certification and disclosure, if any.

	Solicitation Name:	Electric Vehicle (EV) Loan Sales RFP #1
Name of Organization:	·	
Signature:		
Name:		
Title:		
Date:		

SIGN AND RETURN THIS FORM WITH YOUR PROPOSAL SUBMISSION

<sup>&</sup>lt;sup>2</sup> Source: https://www.state.gov/key-topics-bureau-of-democracy-human-rights-and-labor/lobbying-disclosure-and-certification/.