

DEMOCRATIC PARTY of EVANSTON

Fair Economic Opportunity for All

Ratified by Membership – July 24, 2015

Reaffirmed – August 16, 2016

Introduction

America is still the land of opportunity.

When we take the initiative, work hard, and play by the rules, we should be able to make our lives better, which leads to making lives better for our families, communities, and our country. When government policies and programs provide fair opportunity, all of society benefits economically and socially. Programs must be equitable for all, regardless of past or present socio-economic status, race, ethnicity, age, gender, and even generation.

Equity—not that everyone is the same, but that they have the same opportunity to thrive—is a fundamental American value. On July 4, 1776, Congress declared that we have “certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness.” Congress also declared that it is the “Right of the People” to “effect their Safety and Happiness.” In other words, these rights do not just happen. We work through our elected officials and government to secure the right to fair opportunity.

Who we—the Democratic Party of Evanston (DPOE)—work to elect to office is one way we work to achieve these inalienable rights. The DPOE is one of the most active local Party organizations in the country. In 2012, the DPOE was the top Democratic Party township organization for volunteer engagement. It activated 1,100 volunteers for the Obama campaign and sent hundreds of volunteers to canvass in key states. As such, DPOE seeks to make Fair Economic Opportunity for All *the* top policy platform of the national Democratic Party for the 2016 presidential race and a criterion for candidates DPOE may work to support for several reasons:

- Economic health in an increasingly automated, globally-connected world, requires a skilled, productive workforce. Increasing Fair Economic Opportunity for All will help keep America strong and competitive.
- Fair Economic Opportunity for All is founded on the core Democratic Party principle that this country succeeds when everyone gets a fair shot, does their fair share, and plays by the same rules. When government policies favor opportunity for some people, but not for others, it hurts the entire country.
- We are at a tipping point in our nation’s history, where if we do not recalibrate the scales of equity immediately, our economic health, rooted in the economic health of the lower and

middle class, will be undermined, as will much of the work that has been done to shore up our post-recession economy.

The Republican Party couldn't be more antithetical to these values: while chipping away at core safety net programs—nutrition assistance, Medicare and Medicaid, job training, and college affordability, just to give a few examples—the Republican Party seeks tax breaks for the wealthiest corporations and individuals in the country.

The Democratic Party is the Party of the middle class, the Party that helps the underserved, and that seeks fairness regardless of income. Consequently, this is a statement of Democratic Party values, a declaration of expectations for those who represent us and whom we will work to elect.

Fair Economic Opportunity for All

Today, reasons for rising inequity have little to do with personal attributes and behavioral choices. American productivity has rarely been higher. Rather, rising inequity has much to do with opportunities and barriers created or exacerbated by policies that advantage and disadvantage some workplaces, some schools, some communities, and some people over others. Therefore, we achieve Fair Economic Opportunity for All—and remain true to our core values—by refining key government policies and programs.¹

Achieving Fair Economic Opportunity for All won't happen by itself. It will happen through specific policy changes. The policy changes advocated here are not the only ones that can or should be undertaken. But they are a start. And no single policy change will achieve Fair Economic Opportunity for All. Instead, a set of interlocking policy changes are needed in several policy areas: tax, minimum wage, education, equal pay, health, environment, collective bargaining, immigration, and campaign finance reform. Consequently, Fair Economic Opportunity for All calls for policy change in all these areas for the benefit of the 99 percent of Americans who need the chance to succeed the most.

Tax Policy

The tax code should be reformed to help achieve Fair Economic Opportunity for All.²

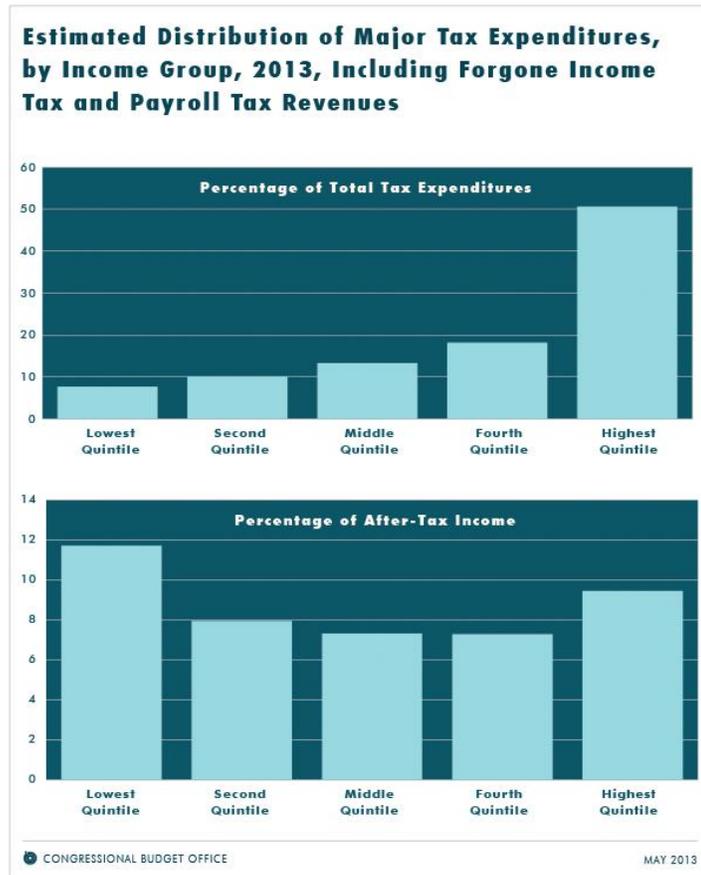
According to the non-partisan Congressional Budget Office, tax breaks unevenly benefit certain populations. As a percentage of *total tax expenditures* (tax breaks) in 2013, more than half of the \$1 trillion in combined tax benefits go to households in the top 20 percent for income earnings (with 17 percent of them going to the top 1 percent of households for income). Thirteen percent of tax expenditures benefit households in the middle 20 percent, and only eight percent of tax expenditures benefit households in the lowest 20 percent for income. The disparity is even more striking for *after tax income*, where the lowest and highest 20 percent of income earners benefit the most, while the middle class (middle three quintiles) benefit from tax expenditures the least.³ The bottom line: most tax breaks benefit those who need them least—the wealthiest Americans—and do not support those—low and middle-class taxpayers—who need them the most.

The tax code should be changed in several specific ways for the sake of equity:

(1) *Increase Taxes for Certain*

Brackets and Activities—Raise

taxes to between 45-49 percent on individuals or families making \$1 million or more; eliminate “deferral,” which permits multinational corporations to keep from paying domestic taxes on revenue they report as generated abroad; and eliminate subsidies for fossil fuel exploration and extraction that suppress federal revenue. This effectively eliminates tax breaks that go to industries that contribute to air pollution, which has other cascading impacts especially to low and middle-income communities (see Environment section).



(2) *Support the Earned Income Tax Credit*—Before it expires in 2017, Congress should make permanent the Earned Income Credit that it passed in 2009, and should expand the credit to more people, including low-income individuals who are not raising children. Candidates should also support the Voluntary Income Tax Assistance (VITA) Act to provide quality tax preparation services to low-income individuals so that they do not overpay because of lack of knowledge.

(3) *Other Reforms*—Other tax reforms must also be supported, like the Financial Security Credit Act of 2013, which allows low-income households to save more for retirement and emergencies.⁴

Minimum Wage

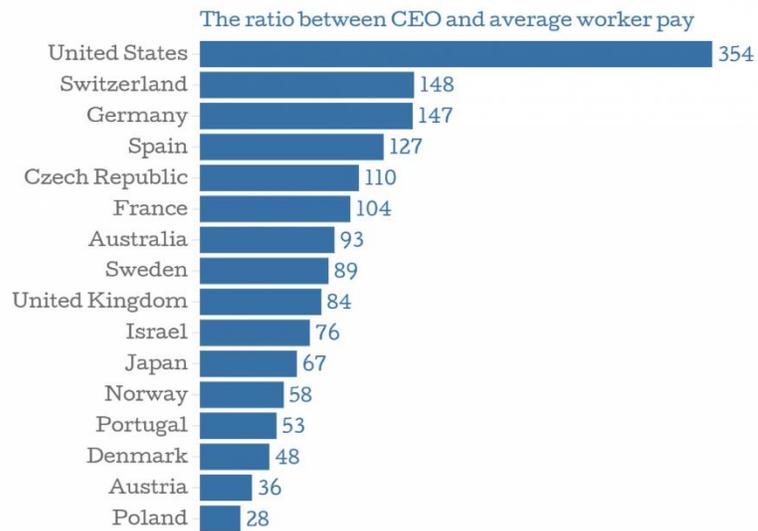
Raising the minimum wage and tying it automatically to the federal inflation rate is one of the most effective tools to improve equity.

No one should live below the poverty line if they work 40 hours per week. But there is also a practical reason for supporting this core value: when people live above the poverty line, they are able to buy goods and services that help support a thriving economy for all.

Raising the minimum wage will help reduce the “wage gap” between those who have profitable ideas and those whose labor is necessary to implement them. The annual pay of CEOs in the U.S. is some 350 times

higher than average annual workers’ pay, a ratio that is far beyond that in most of the advanced societies in the world (see accompanying chart) and far beyond what we have historically experienced and expected in the United States.⁵ The wage gap will likely continue to grow if the Democratic Party is not more proactive to address it. The average CEO made 40 times the average worker’s annual wage only a few decades ago. During the 2001-2002 recession, the wage gap was 12 percent, but nearly doubled—to 23 percent—during the most recent recession.⁶ The effective federal minimum wage peaked nearly 50 years ago in 1968 at \$8.56 (adjusted for inflation in 2012 dollars).⁷ Accordingly:

It pays to be a CEO in the U.S.



Made with Chartbuilder

Data: How Much (More) Should CEOs Make?

- (1) *Raise the Minimum Wage*—Congress should raise the minimum wage immediately to \$15 per hour. Precedent for this exists in San Francisco and Seattle, with other cities such as Los Angeles and Philadelphia considering similar measures.
- (2) *Index the Minimum Wage to Inflation*—Congress should tie future minimum wage adjustments to the national inflation rate so that Americans do not need to wait for years or decades for an effective minimum wage adjustment. Indexing automatically to the inflation rate will also ensure that the lowest-paid workers will not suffer during economic boom times when housing and commodity prices rise sharply.

Education

Providing children with access to learning early in their lives and availing affordable education to everyone are two of the most important means of ensuring Fair Economic Opportunity for All. These reforms can complement communities that already provide strong support for their neighborhood public school.

Children of high- and low-income families are born with similar abilities. As our brains develop, we readily learn an array of cognitive skills, such as curiosity, self-control, and determination—

all critical characteristics for later academic and workplace success. Outside forces, however, intervene to give some children advantages over others. For example, wealthier parents have more resources (e.g., schedule flexibility, finances) to invest in their children's education and enrichment activities. As a result, by age four, differences between children of different economic backgrounds begin to appear. By the time a child enters kindergarten, differences can be significant.⁸

Similarly, decades of research show that policies that expand access to, and improve the quality of, early childhood learning can reduce disparities in economic opportunity later in life. For example, without a college degree, children of the poorest families have a five percent chance of moving to the top quintile income level. With a college degree these children have a 19 percent chance of rising to the top fifth for income.⁹ Investments in quality early childhood learning pay many other dividends to society.¹⁰

With quality pre-kindergarten so important for laying the foundation for learning throughout life, yet with personal and governmental budgets shrinking, how can middle and low-income families afford pre-k? One organizational approach is the "parent cooperative," "cooperative preschool," or "pre-k co-op." Pre-k co-ops work by pooling parental labor, funds, and other resources to decrease the per-child cost of pre-k education. A teacher is hired by the parents, who also keep costs down by voluntarily performing many operational functions (e.g., cleaning, bookkeeping, etc.). In the classroom, pre-k co-ops also provide a valuable opportunity for parents to learn parenting techniques from each other. These schools build strong communities in the process. The idea for pre-k co-ops originated in Chicago a century ago and are now used in the U.S., Canada, Britain, and New Zealand. Though official statistics are difficult to locate for pre-k co-ops, with budget challenges growing, it is time to re-visit them as a way to reinvigorate our commitment to quality pre-school education.¹¹

In expensive cities such as New York, pre-k cooperatives have been a necessity even for middle class families who have been priced out of the private preschool market. It is not uncommon for parents to pool their time and resources to develop unlicensed, unaccredited "underground" cooperatives that may be run out of a home or other private location. At present, funding for official licensed schools often comes from available state grants, especially when schools are administered through larger organizations such as community colleges. In many states, however, budget pressures are offloading greater portions of the costs onto families. Participating families must pay higher fees or seek alternate methods of collective fundraising.

Just as access to early-childhood learning improves chances of economic success later in life, access to *affordable* education by everyone achieves similar results.

In Pay-It-Forward/Pay-It-Back (PIF/PIB) financing models, the state or the college initially covers all or a portion of the student's education costs (which could include, for example, only tuition and mandatory fees) and the student pledges to pay a percentage of his or her income for a number of years after leaving school. Ideally, after a period of many years, enough students would be paying back enough money that the system would become self-sustaining and no

longer require additional support from the state or college to make up for the foregone tuition payments.¹²

- (1) *Early Childhood Learning*—The federal government should fund pre-k co-ops through states for accreditation. One possible federal funding program could be Head Start, administered by U.S. Department of Health and Human Services. The goals and mission of Head Start, including parent education, may be well served by supporting the unique approach of pre-k cooperatives.
- (2) *Affordability*—Congress should require private higher education institutions with \$1 billion or more in endowment values that receive tax-exempt status or other government subsidies to institute a PIF/PIB financing pilot program. The institution may continue to receive tax-exempt status or other government subsidies as long as the institution retains the program for 15 years or until the program becomes self-sustaining, whichever comes first. Institutions that do not fully support the program risk losing tax exempt status and subsidies.

Equal Pay

Women and men should receive equal pay for doing the same job.

Today, data suggest that women earn less than men for substantially similar jobs and when normalizing for differences between the two genders.¹³ Women who hold MBAs, for example, make some \$14,000 less in expected annual pay than men.¹⁴ Even when normalized to take into account that women may enter lower-paying professions, college-degreed women make about \$1.2 million less over 35 years than men with the same education. The pay gap begins almost immediately, with women earning 7 percent less than men within one year after graduating from college. The pay gap then increases as men and women's careers progress. Over a lifetime, this disparity can have significant consequences, with women receiving lower pensions and more likely to be at risk of poverty than men.¹⁵

The need for equal pay connects to raising the minimum wage, too (see other section). A fair minimum wage helps ensure equality at lower ends of the economic spectrum. But beyond that, equal pay helps ensure that single-parent households—typically run by women—can afford child care and other support systems that enable women to pursue their careers of choice rather than necessity so they will be in a position or have the opportunity to earn more equal pay. To effectuate equal pay:

- (1) *Shift the Burden of Proof*—Congress should enact legislation placing the burden of proof on employers to demonstrate a legitimate basis—in experience, education or otherwise—for a gender-based difference in pay for substantially-similar jobs.
- (2) *Make Leave More Equitable*—A minimum of six weeks' paid maternity and paternity leave must be required for federal workers for the birth or adoption of up to two children. The other policies in Fair Economic Opportunity for All must also be adopted. One reason women receive less pay, for example, is because they typically have to take more unpaid time off

work after the birth of a child. They often stay home, also unpaid, when a child is sick. Passing “family-friendly” policies to ensure women are protected against discrimination for having children or caring for family members is essential so the U.S. can stop slipping behind other developed countries in equalizing the female workforce.¹⁶ Beyond parental leave, similar policies for sick leave, leave for caring for elderly or other sick family members, and ensuring that non-federal workers have similar benefits will also help advance equity.

Health Policy

Equitable health care for all translates into Fair Economic Opportunity for All. Two policy solutions in particular can help: providing fair pay for health professionals who care for the underserved and reforms to create a fair and effective medical malpractice system.

Poor health translates into poor productivity, which erodes individuals’ ability to make money for themselves and their families. Similarly, high health care costs take up money necessary to fund education and other priorities that allow individuals a “fair shot” in life. In 2012, almost half of Americans reported avoiding needed medical care due to costs and more than 75 million said they were having trouble paying their medical bills. Before passage of the Affordable Care Act, or ACA, up to 50 million Americans each year went without health insurance. Recent statistics show that many of these numbers have been improving as a result of the ACA,¹⁷ but much work remains to be done to achieve fully equitable health care for all.

Despite the ACA, two issues in particular are putting health care access and affordability at risk: inadequate care for patients on Medicaid and an unsatisfactory malpractice system. Each problem is fixable:

- (1) *Make Medicaid More Equitable*—Provide equal access for patients on Medicaid. Low income individuals on Medicaid can have difficulty accessing health care providers willing to accept the low reimbursement offered by many Medicaid programs. In effect, in many states, health professionals today are financially penalized for providing care to low income patients. A fair health care system would provide the same reimbursement for Medicaid as Medicare patient care. The ACA provided this “pay parity” for a limited time in a provision of the law that expired in January 2015. Some states have chosen to extend pay parity, but many have not. To achieve equitable care for all, pay parity between Medicaid and Medicare should be the law of the land in every state.
- (2) *Reform the Medical Malpractice System*—Provide a fair and effective medical malpractice system. The medical malpractice system should accomplish two goals: (A) it should provide fair compensation for victims of medical errors, and (B) it should drive improvements in health care to prevent such errors from taking place again. The current malpractice system does neither. Most injured patients go without compensation, doctors sometimes find themselves subject to costly and unfair litigation, and fear of malpractice drives “defensive medicine” more than meaningful efforts to improve health care safety and quality. In 2006, then-Senators Barack Obama and Hillary Rodham Clinton wrote that the current malpractice

system, “does not promote open communication to improve patient safety.” Instead, it “jeopardizes patient safety by creating an intimidating liability environment.” Some state-level tort reforms, such as capping damage awards, as is the case for personal injury under some state laws, are highly contentious. Several types of reform, however, are widely-recognized as equitable and effective, and should be implemented nationwide. In particular, safe harbor from malpractice claims should be provided to health professionals who follow recognized practice guidelines and who use validated decision aids to engage patients in fully shared decision-making. In addition, policy makers should explore the feasibility of implementing a “no-fault” system in the US and specialized “health courts” for hearing malpractice cases.¹⁸

Environment

The environment—clean water, air, land, and the fauna and flora with which we share Earth—is everyone’s life support system. We depend on it equally. As we transition from a dirty air economy to a clean air economy, job transition training is critical for those in affected sectors.

Environmental problems, from climate change to air pollution, from water shortages to loss of subsistence species, can have a disproportionate impact on low-income individuals and communities. Asthma, for example, which is caused by poor outdoor and indoor air quality, accounts for 14.4 missed school days annually according to the Centers for Disease Control and Prevention.¹⁹ Missed school days can translate into educational disadvantages, which then suggests disadvantages when it comes to getting and keeping jobs (see Education and Equal Pay sections). It also means families must spend more money on medical care, thereby having less money for other needs in life (see Health Policy section). The list goes on about the many ways environmental policy is linked to Fair Economic Opportunity for All. The effects of air pollution create a health and financial drag on everyone.

Greenhouse-gas-driven climate change is another hardship for many Americans, and one of the largest sources of carbon dioxide is the burning of coal for energy production.²⁰ To address this problem we must:

- (1) *Reduce Greenhouse Gases*—Continue to reduce CO₂ and other air pollution that cause health and financial problems by requiring fossil fuel-based energy sources to reduce air pollution. As such, DPOE calls on candidates to support efforts—regulatory and incentive-based, such as the federal Clean Power Plan²¹ and the Illinois Clean Jobs Act²²—that reduce air pollution from fossil fuel-based energy sources.
- (2) *Support Job Training*—Provide tools and training for people—often blue collar workers—who have worked in the fossil-fuel sector. The U.S. Department of Commerce’s Partnerships for Opportunity and Workforce and Economic Revitalization (POWER) program,²³ Green Jobs Act of 2007, and the American Recovery and Reinvestment Act of 2009 are examples of such programs that have sought to help workers who, through no fault of their own, may get caught in the transition to a clean energy economy. But such programs must be targeted

effectively and sustained at significant levels.²⁴ These programs also have the added benefit of helping middle-class jobs in particular, and often union jobs that help equalize pay.²⁵

Support for Collective Bargaining

In a time of almost-unprecedented ability to concentrate capital in both the business and political sectors, the ability of workers to ensure fair negotiations for fair wages is a bulwark not just for labor, but for economic democracy. As such, DPOE supports candidates who support collective bargaining.

In virtually every state where Republican candidates occupy a governor's mansion, "right-to-work" laws are proposed to undercut the right of American workers to seek fair wages. The right to collective bargaining is fundamental to a fair economy as evidenced by the American labor movement, which achieved the 40-hour work week, paid leave, health insurance, and a minimum wage (see other sections). To advance our core values, DPOE:

- *Support Collective Bargaining Rights*—To advance our core values, supports candidates who support collective bargaining rights. DPOE opposes candidates who, either individually or as a member of a Party, oppose collective bargaining.

Immigration

Having clear, fair rules for legal immigration will help ensure Fair Economic Opportunity for All.

The link between fair immigration policy and economic growth is clear. For example, if no green card or H-1B visa constraints had existed between 2003 and 2007, an additional 182,000 foreign graduates in science and technology fields—workers that are needed—would have remained in the U.S., with a GDP contribution of \$14 billion in 2008, including \$2.7-\$3.6 billion in tax revenue. In addition, if 300,000 H-1B visa holders had been in the U.S. labor force, they would have earned \$23 billion in 2008 and generated \$34-\$47 billion in tax payments over the ensuing decade. For those immigrants not going into science and technology fields, the effect of their joining the work force tends to complement existing workers, not displace them.²⁶ This is not to say that we should remove restrictions on coming to the U.S. for education. It is to show, however, that fair immigration policies can aid equity and the economy.

- *Support A Clear Pathway to Citizenship*—DPOE supports candidates who support a pathway to citizenship for people who bypassed the official immigration system, but have shown a commitment to legitimate participation in American society, and also urges candidates to support policies where immigration will complement existing workers, not displace them. DPOE also believes that Congress should pass the Development, Relief, and Education for Alien Minors (DREAM) Act. Breaking down barriers due to the circumstances of one's birth is one essence of greater economic opportunity.

Campaign Finance Reform

In addition to ending voter suppression and renewing the Voting Rights Act, Campaign finance reform is critical, because without fair elections for policymakers, policies themselves will tilt against Fair Economic Opportunity for All.

Recent U.S. Supreme Court decisions, unfortunately, have made for unfair elections. For example, the Court ruled in 2010 that corporations may make unlimited contributions to political organizations as long as corporate donors do not coordinate with candidates' campaigns. Limitations on organizational contributions, the Court argued, violates the U.S. Constitution's 1st Amendment guarantee of free expression.²⁷ The Court further entrenched its stance on campaign contributions by ruling that aggregate limits on campaign contributions are unconstitutional.²⁸ These rulings allow moneyed corporations and organizations to support candidates who may be elected to undercut the very policies that advance Fair Economic Opportunity for All.

A look back through history shows that these rulings are inconsistent with other U.S. Supreme Court opinions, making them even more out of touch with the needs of society. For example, the Court itself has held over the decades that the 1st Amendment's right to freedom of expression is not absolute; that the government can regulate free speech when the public interest may be harmed.²⁹ It is difficult to imagine a greater harm to society when money encourages policymakers to act on behalf of special interests instead of the public interest.

- *Establish Small Donor Match Programs*—A short-term solution is for the establishment of “small donor match programs,” in which a candidate may raise a prescribed amount from small donors to qualify for public matching funds at a 6:1 ratio.
- *In the Long-Term, Require Public Financing of All Campaigns*—In the long run, the way to fix this distortion of democracy is public financing of all campaigns so that special interests do not have a disproportionate influence, and so upon election, officials work for the general public.

Conclusion

When on November 19, 1863, Abraham Lincoln affirmed the American principle of equality, it was to do more than address racial inequities. It was to proclaim that ours is a “government of the people, by the people and for the people,” not of some people, by special interests, for the benefit of a select few. The Democratic Party will continue to work toward Fair Economic Opportunity for All.

NOTES

- ¹ Shapiro, T., et al., “The Roots of the Widening Racial Wealth Gap: Explaining the Black-White Economic Divide,” Institute on Assets and Social Policy, Brandeis University (February 2013). <http://iasp.brandeis.edu/pdfs/Author/shapiro-thomas-m/racialwealthgapbrief.pdf>.
- ² <http://accesstofinancialsecurity.org/content/reforming-tax-code-build-equitable-economy>
- ³ Congressional Budget Office, “The Distribution of Major Tax Expenditures in the Individual Income Tax System,” <http://www.cbo.gov/publication/43768> (May 29, 2013).
- ⁴ McCulloch, Heather, Tax Policy Project, <http://accesstofinancialsecurity.org/content/reforming-tax-code-build-equitable-economy>.
- ⁵ Kiatpongsan, S., et al., “How Much (More) Should CEOs Make? A Universal Desire for More Equal Pay,” *Perspectives on Psychological Science*, Vol. 9(6) 587-593(2014), published in the Harvard Business Review, http://www.hbs.edu/faculty/Publication%20Files/kiatpongsan%20norton%202014_f02b004a-c2de-4358-9811-ea273d372af7.pdf and covered in <http://www.washingtonpost.com/blogs/wonkblog/wp/2014/09/25/the-pay-gap-between-ceos-and-workers-is-much-worse-than-you-realize/>.
- ⁶ U.S Conference of Mayors, “Income and Wage Gaps Across the U.S.,” <http://www.usmayors.org/metroeconomies/2014/08/report.pdf> and <http://www.usmayors.org/pressreleases/uploads/2014/0811-release-metroeconwagegap.pdf> (August 2014).
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- ⁹ College Advising Corps, <http://advisingcorps.org/our-work/the-need/> (March 1, 2015).
- ¹⁰ Nobel Prize-winning economist and University of Chicago Professor James Heckman, <http://heckmanequation.org/heckman-equation> & Cornell University Department of City and Regional Planning Professor Mildred Warner, <http://www.mildredwarner.org/econdev/child-care>.
- ¹¹ The concept of pre-k co-ops was established in 1916 by a group of University of Chicago wives. Schools followed throughout the United States, Canada, Britain and New Zealand. Today, this model is found throughout the world. In 2015, the umbrella organization Parent Cooperative Preschools International (PCPI). <http://www.preschools.coop/>.
- ¹² Illinois Student Assistance Commission, <http://www.isac.org/dotAsset/1b1c678e-6a2e-463c-bfaa-f3265d9c87ec.pdf> (2014).
- ¹³ Bureau of Labor Statistics, “Women’s earnings and employment by industry, 2009,” http://www.bls.gov/opub/ted/2011/ted_20110216.htm (February 2011).
- ¹⁴ *Bloomberg Businessweek*, <http://www.businessweek.com/articles/2014-11-14/women-make-less-than-men-even-when-they-are-equally-qualified-mbas> (November 14, 2014).
- ¹⁵ American Association of University Women, *Graduating to a Pay Gap*. See, <http://www.aauw.org/resource/graduating-to-a-pay-gap/> (October 2012).
- ¹⁶ Blau, F., et al., “Female Labor Supply: Why is the US Falling Behind?” National Bureau of Economic Research, <http://www.nber.org/papers/w18702> (January 2013).
- ¹⁷ Collins, S., et al., “The Rise in Health Care Coverage and Affordability Since Health Reform Took Effect,” Issue Brief, The Commonwealth Fund (January 2015). See, http://www.commonwealthfund.org/~media/files/publications/issue-brief/2015/jan/1800_collins_biennial_survey_brief.pdf
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- ²² www.ilga.gov/legislation/BillStatus.asp?DocNum=2607&GAID=13&DocTypeID=HB&SessionID=88&GA=99

²³ <http://www.eda.gov/power/>.

²⁴ U.S. Government Accountability Office, “Labor’s Green Jobs Efforts Highlight Challenges of Targeted Training Programs for Emerging Industries,” <http://www.gao.gov/products/GAO-13-555> (2013).

²⁵ Utility Workers Union of America, <http://uwua.net/press-releases-2014/job-strategies-called-clean-energy-transition-workers-fossil-fuel-industry.html> (2014).

²⁶ Furchgott-Roth, D., “The Economic Benefits of Immigration,” The Manhattan Institute for Policy Research, Issue Brief No. 18, February 2013. http://www.manhattan-institute.org/html/ib_18.htm#.VNaP8tFTHug.

²⁷ *Citizens United v. Federal Election Commission*, 558 U.S. 310 (2010).

²⁸ *McCutcheon v. Federal Election Commission*, 572 U.S. ____ (2014).

²⁹ For example, the FCC may regulate public airwaves when it comes to certain forms of speech. *Federal Communications Commission v. Fox Television Stations, Inc.*, 556 U.S. 502 (2009).