



## Policy on Lobbying Activity

### PURPOSE

Federal law prohibits recipients of federal funds, whether through grants, contracts, or other agreements, from using federally appropriated funds to influencing or attempting to influence (“Lobby” or “Lobbying”) an officer or employee of a federal agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress (“Federal Official”) in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, or the extension, continuation, renewal, amendment, or modification thereof (“Federal Award”). See 31 U.S.C. § 1352. The purpose of this law is to prevent the use of federally appropriated funds for lobbying activities, and to monitor the lobbying expenditures of federal funds recipients.

### POLICY

It is the policy of the College that no federally appropriated funds have or will be expended, by or on behalf of the College, to Lobby any Federal Official in connection with a Federal Award. This policy applies to all Federal Awards and includes all proposals, sub-proposals, awards and sub-awards.

**Certification:** If a Federal Award exceeds \$100,000, specific certification is required to certify that the College has followed this policy. Such certification should be submitted at the time of submission of the project proposal to the grants office.

**Employees:** Regularly employed individuals at the College who are paid from federally appropriated funds are prohibited from lobbying any Federal Official in connection with a Federal Award (i.e. paid from a federal grant that has been secured). Regularly employed individuals are also prohibited from utilizing federally appropriate funds for travel to engage in Lobbying of any Federal Official in connect with a Federal Award. For purposes of this policy, a “regularly employed individual” is one who has been continuously employed by the College for at least 130 days in the previous 12 months.

**Disclosures:** If any funds other than federally appropriated funds have or will be used to pay for Lobbying of a Federal Official in connection with a Federal Award by an individual or entity not regularly employed by the College, an appropriate disclosure form must be completed prior to submission of the proposal for such award and thereafter at the end of each calendar quarter in which there occurs any event requiring disclosure or affecting the accuracy of the information contained in any previously filed disclosure. No disclosure is necessary for Lobbying conducted by regularly employed individuals at the

College who are not otherwise prohibited from Lobbying. However, regularly employed individuals must not engage in Lobbying while being paid with or utilizing for travel federally appropriated funds.

**Approval for Expenditure of Non-Federal Funds:** Use of non-federally appropriated funds for Lobbying of Federal Officials must be approved through the appropriate administrative channels of the College. Penalty for non-compliance: Penalties under federal law for violating 31 U.S.C. § 1352 could include fines of not less than \$10,000 and not more than \$100,000 per violation and any other remedies the federal government deems appropriate including loss of the particular award and/or suspension or debarment as an institution from further federal funding. Any College employee who violates this policy will be subject to appropriate disciplinary action, up to and including termination.