



OP 80.07 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/PROCEDURE

It is the policy of the University that no federally appropriated funds have or will be expended, by or on behalf of the University, 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 University has followed this policy. Such certification should be submitted at the time of submission of the project proposal to the Office of Sponsored Projects.

Employees: Regularly employed individuals at the University who are paid from federally appropriated funds are prohibited from Lobbying any Federal Official in connection with a Federal Award. 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 University 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 University, 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 University 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 University. For projects originating from the Division of Agriculture, Forestry and Veterinary Medicine, non-federal funds to be expended for the purpose of Lobbying Federal Officials must be approved in writing by the Vice President for Agriculture, Forestry and Veterinary Medicine and the Chief Communications Officer. For all other projects, non-federal funds to be expended for the purposes of Lobbying Federal Officials must be approved in writing by the Vice President for Research and Economic Development and Chief Communications Officer. Copies of approved requests to Lobby using non-federal funds and quarterly disclosure of expenditures used for lobbying purposes should be sent to the Office of Sponsored Projects.

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 university employee who violates this policy will be subject to appropriate disciplinary action, up to and including termination.

REVIEW

This policy shall be reviewed every four years by the Vice President of Research and Economic Development.

REVIEWED BY:

/s/ Kevin Enroth
Director, Office of Sponsored Projects

09/02/2022
Date

/s/ Sid Salter
Chief Communications Officer

09/02/2022
Date

/s/ Julie Jordan
Vice President, Research and Economic Development

09/16/2022
Date

/s/ Tracey N. Baham
Assistant Vice President, Institutional Strategy & Effectiveness

09/16/2022
Date

/s/ Joan Lucas
General Counsel

09/26/2022
Date

APPROVED BY:

/s/ Mark E. Keenum
President

10/24/2022
Date