



# CRR: Lobbying and Political Activities

## Compliance Risk Areas

Compliance Risk Areas	Related Governing Laws, Rules, Regulations, or University Policies
<p>Required to inform the president when appearing before state and legislative bodies. Requested to inform the president when asked to serve on a committee appointed by the governor or legislature.</p>	<ul style="list-style-type: none"> <li>Board of Regents Policy: Appearances Before the Legislature and Other Public Bodies</li> </ul>
<p>Consult with the appropriate college or administrative unit prior to initiating a candidacy for or appointment to a public office.</p>	<ul style="list-style-type: none"> <li>Board of Regents Policy: Employees Campaigning for or Holding Public Office Administrative Policy: Campaigning for or Holding Public Office</li> </ul>
<p>Registration of in-house federal lobbyist(s); required quarterly reports filed to include: income and expenses, areas and issues for which there were lobbying activities, Houses of Congress and federal agencies lobbied  Semi-annual reporting of contributions made by the registered lobbyist</p>	<ul style="list-style-type: none"> <li>USC Title 2 Ch. 26 Disclosure of Lobbying Activities, and</li> <li>Honest Leadership and Open Government Act of 2007 (Stat. 735)</li> <li>Note: The comparable state statute- 2017 MN Statute 10A.01- excludes an employee of a public higher education system from the definition "lobbyist."</li> </ul>
<p>None of the funds appropriated by any act may be expended by the recipient of a federal contract, grant, loan or cooperative agreement to pay any person for influencing or attempting to influence an officer or</p>	<ul style="list-style-type: none"> <li>USC Title 31 Subtitle II Ch. 13 Sec. 1352</li> </ul>

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<p>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 any of the following actions:</p> <ul style="list-style-type: none"><li>• the awarding of any federal contract,</li><li>• the making of any federal grant,</li><li>• the making of any federal loan,</li><li>• the entering into of any cooperative agreement,</li><li>• the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.</li></ul>	
<p>No University official shall give a gift or solicit another to give a gift to any federal, state, or local government official or to any member of their staff. "University official" includes University employees officially engaged in legislative lobbying on behalf of the University. Tickets to University athletic or cultural events and many other items are excluded from the definition of "gift."</p>	<ul style="list-style-type: none"><li>• Board of Regents Policy: Gifts Received and Given by Regents and University Officials</li></ul>
<p>A Regent shall resign from the Board upon Officially announcing candidacy for any partisan elective public office.</p>	<ul style="list-style-type: none"><li>• Board of Regents Policy: Code of Ethics for Members of the Board of Regents</li></ul>
<p>Disallowed Activities. No substantial part of the activities of a recognized foundation should consist of disseminating propaganda, attempting to influence legislation, or participating or intervening in any political campaign on behalf of a candidate for public office.</p>	<ul style="list-style-type: none"><li>• Board of Regents Policy: Foundations at the University, Section V, Subd. 6</li></ul>

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Prohibited Uses of University Trademarks  
Neither the name of the University nor any University trademark may be used in any manner that could adversely affect the University's image or standing or would for any other reason be inappropriate for a public research university. Such proscribed uses include, but are not limited to, the use of University trademarks in connection with...political parties or organizations...

- Administrative Policy: Brand Policy: Trademarks, Logos, Colors, and Seal

## General compliance question(s)

1. How is compliance with the policy monitored?
2. What is the frequency of the monitoring?
3. What are the typical noncompliance issues found and how are they corrected?
4. Have there been any recent (within 3 years) internal audit findings? If yes, how was the risk mitigated?

## Appearances before state and legislative bodies

Committee service appointed by the legislature or governor

1. How are appearances before the state legislature monitored?
2. What mechanism(s), if any, exist to inform the president when University community members appear before the legislature?
3. What measures are taken when an individual fails to meet the specified reporting requirement when appearing before the legislature?
4. The policy "requests" that the president be informed about committee assignments. Is this monitored?

## Candidacy or appointment to public office

1. How is it assured that appropriate consultation is taking place?

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2. What could be done, if anything, to improve this process?

## Registration and reporting requirements for federal lobbyists

1. Are there challenges to meeting the filing requirements?
2. Does the University have any contracts with outside federal lobbyists? If so, please explain how they operate.

## Appropriation of federal funds and restricted activities

1. How does the University assure that faculty and/or staff who enter into federal contracts, grants, loans, or cooperative agreements does not use the funds in proscribed ways?

## Gifts to federal, state and local officials and their staff

1. What actions are taken to inform University officials (see Board of Regents policy on Institutional Conflict of Interest) on the gift policy?

## Resignation from Board of Regents

1. What role, if any, does Government and Community relations play in monitoring compliance to this policy?

## Disallowed Activities of Foundations

1. How are the activities of the University foundations (UMF and the Minnesota Landscape Arboretum Foundation) to assure compliance to policy?
2. Would any potential activities of individual donors fall within the scope of this policy?

## University Trademarks, Logos, Colors, and Seal

1. How is compliance with this policy monitored?

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