


## Interoffice Communication

**DATE:** March 27, 2008

**TO:** Administrative Officers

**FROM:** Gregory Geoffroy, President 

**RE:** New Federal Rules on Lobbying – Implications for Iowa State University

I am writing to let you know about the recently amended rules on lobbying Congress and their impact on colleges, universities, and higher education groups. Under S.1, the “Honest Leadership and Open Government Act of 2007,” lobbyists and organizations that employ in-house lobbyists – like Iowa State University – are subject to more stringent disclosure rules, including increased civil and new criminal penalties. It is important to note that the new rules apply to all employees of the university, and not just to our registered lobbyist, Dr. Allison Rosenberg.

This memorandum outlines what is expected of all university employees with regard to the disclosure of lobbying contacts and activities. I ask that you review it carefully as you will be asked on a periodic basis to provide relevant information to the Office of Governmental Relations to be used in our official filing.

In the context of these new reporting requirements, the following definitions apply:

- **Lobbying Contact:** Any oral, written, or electronic communication to a covered official (Member of Congress; congressional staff, the President, Vice President, or any officer or employee in the Executive Office of the President; any Executive Schedule level I-V employee; or any member of the Armed Services at or above pay grade 0-7) regarding the formulation, modification, or adoption of federal legislation *including appropriations*; the administration or execution of a federal program or policy; or formulation, modification, or adoption of a federal rule, regulation, Executive order, policy or position of the U.S. government.
  - The term “lobbying contact: does *not* include any material that is distributed and made available to the public through a medium of mass communication; testimony given before or submitted to Congress; or information provided in writing in response to a request from covered officials or filed in the course of a public proceeding.
- **Lobbying Activities:** Lobbying contacts (as above) and any efforts in support of such contacts, including preparation or planning activities, research, *and other background work* that is intended at the time of preparation for use in contacts or in coordination with the lobbying activities of others.

To comply with the new reporting requirements, university employees will be asked on a quarterly basis to provide detailed cost information as outlined below to ISU's Office of Governmental Relations:

- Employees must disclose the costs associated with any lobbying activity on behalf of their official role or work at the university – including salary, benefits, travel costs, and time spent in preparation and planning for those activities by all involved, including support staff.
- Any university department or office that sponsors an event to expressly honor a Member of Congress must disclose the costs associated with that event.

I encourage you to distribute this memorandum to anyone in the unit you lead who may be engaged in lobbying contacts and activities as defined above and remind them of the importance of maintaining accurate reporting records. Significant new civil penalties apply for failure to accurately report these costs, and criminal penalties apply for “knowing and willful” violations of these provisions. In keeping with established protocol at ISU, contact with Members of Congress and their staff conducted on behalf of the university should be coordinated – in advance, whenever possible – with ISU's Office of Government Relations through our office in Washington, D.C. (Dr. Allison Rosenberg, [allisonr@iastate.edu](mailto:allisonr@iastate.edu), Ph: 202-403-8610). To view the president's memo regarding lobbying click [here](#).