



Federal Relations Lobbying Policies

To comply with the federal Honest Leadership and Open Government Act of 2007, Rensselaer Polytechnic Institute is required to file quarterly lobbying reports and must certify that employees are aware of the rules of the House and Senate regarding gifts and travel.

It is the responsibility of the Director of Federal Relations to file all appropriate reports related to state and federal lobbying with the Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives.

1. Definition of Federal Lobbying:

Oral, written, or electronic communications to covered Legislative or Executive Branch Officials regarding:

- Formulation, modification, or adoption of Federal legislation.
- The administration or execution of a Federal program or policy.
- Formulation, modification, or adoption of a Federal rule, regulation, Executive order, policy, or position of the United States Government.
- The nomination or confirmation of a person subject to confirmation by the Senate.

Covered Legislative or Executive Branch Officials include:

- The President and Vice President of the United States.
- Members of Congress.
- Any elected officer of either the House or Senate.
- Employees of a Member, Committee, leadership staff, joint committee, working group, or caucus.
- Any officer or employee in the Executive Office of the President of the United States.
- Any Executive Schedule level I-V officer or employee.
- Certain Senior Members of the Armed Services.
- "Schedule C" political appointees.

Lobbying does not include non-partisan analysis, study, or research and the communication or research findings to the general public, officials, or governmental bodies. However, anyone using the results of non-partisan analysis to influence specific legislation is, by definition, engaged in lobbying.

The Institute must report lobbying expenditures quarterly. There are limits on the amount that charitable organizations are permitted to spend on lobbying. In addition, the federal government prohibits the use of federal funds for lobbying activities.

Only the Director of Federal Relations in Rensselaer's Washington D.C. Office is a federally registered lobbyist for the university; however, if any faculty or staff engage in any lobbying activities related to Rensselaer he or she must contact the Director of Federal Relations at 202-220-1320 to determine if any time and/or expenses should be included in the Institute's quarterly lobbying disclosure.

Contact with federal program managers regarding current grants or questions regarding applications are not considered lobbying. However, contacts with higher level agency officials could be considered lobbying contacts; therefore, these types of contacts should be reported to the Director of Federal Relations.

2. Congressional Gift Rule

All Rensselaer faculty and staff that have contact with federal government officials must be familiar with the rules of the House and Senate regarding gifts and travel.

Members of Congress and their staff may not accept gifts from organizations, associations, or businesses that employ lobbyists.

The term "gift" is used broadly to include meals, entertainment, and anything else "of value." Members of Congress and their staff may never solicit a gift from any person who has interests before Congress; accept a gift that is linked to any official action that the individual has taken, or is being asked to take; or accept any other gift, unless specifically allowed under one of the provisions of the House or Senate rules.

Members and their staff can accept items of nominal values which would include greeting cards, baseball caps, t-shirts, and informational materials – books, videotape, and DVDs.

Exception for Widely Attended Events

There is an exception made for any event/reception that at least 25 people other than Members of Congress and their staff and open to individuals from throughout a given industry or profession. The invitation must come from the sponsor of the event and the attendance must be related to the person's official duties. Widely attended events include receptions, conventions, conferences, or briefings. There is no limit on the cost of a meal as long as it is not lavish, unsolicited, and from the sponsor of the event, not an entity that merely donated money or bought a table. They may also attend receptions offering "food or refreshments of nominal value."

Travel Rules

Members of Congress and their staff in officially-connected travel paid for by private sources (such as a university) must get approval in advance from the appropriate ethics committee. All travel is subject to public disclosure and increased scrutiny. In all cases, the trip must be connected to a meeting, speaking engagement, fact finding trip, or similar official event, and funding cannot include recreational activities. Higher education institutions may sponsor short-term travel (up to four days for domestic) to attend conferences and events. Other entities employing lobbyists are restricted to provide one-day trips provided lobbyist involvement in requesting or planning the trip is minimal.

Awards

Any event involving a presentation of an award or honorary degree to a covered federal government official must be reported to the Director of Federal Relations. The cost of certain events involving awards must be publically disclosed to the Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives.

More information

The Gift and Travel Rules must be followed if federal officials are invited to on-campus events. More information can be found at: <http://www.house.gov/ethics/> and <http://ethics.senate.gov/>.

In addition all federal agencies have specific gift rules. Faculty and staff planning to invite any federal official to events on campus should check agency gift rules to ensure compliance with these rules.

3. Political Activities

Rensselaer does not discourage faculty and staff from engaging in political campaign activity or lobbying activity on their own time in a personal capacity, or on behalf of groups or organizations to which they belong.

However, when activities are undertaken in a personal capacity, it is the responsibility of the individual involved to state expressly that the activity is conducted in a personal capacity and not in his or her capacity as a representative of Rensselaer.

Subject to limited exceptions for permissible certain student activities, Rensselaer resources of any kind (e.g., letterhead, email, secretarial support, printers, office supplies, meeting rooms) may never be used in connection with any political campaign activity. Rensselaer resources may be used in connection with certain lobbying activity undertaken in a personal capacity (for instance in conjunction with a professional scientific society) only when reported to the Director of Federal Relations.