



VANDERBILT
Government *and*
Community Relations
Office of Federal Relations

To: Distribution

From: Vice Chancellor for Government and Community Relations J. Nathan Green
Associate Vice Chancellor for Federal Relations Christina West

Re: Annual reminder on federal lobbying disclosure and gift rules

Date: January 27, 2023

With the start of the 118th Congress, we want to remind you of the current regulations regarding federal lobbying disclosure reports as well as congressional restrictions on gifts, meals, and travel. As an institution that employs registered federal lobbyists to advance and safeguard its considerable interests in the nation's capital, Vanderbilt University is required to file quarterly disclosure reports with the House and Senate detailing lobbying activities and associated expenses. We are also subject to sweeping rules severely restricting gifts and meals for covered Executive Branch officials, Members of Congress, and congressional staff. There are substantial civil and criminal penalties for violations of these ethics rules and failing to file lobbying reports in a timely and accurate manner. These restrictions apply to all Vanderbilt University employees, faculty, and staff and we ask for your continued cooperation with the following internal guidelines, which are designed to reduce the possibility of inadvertently violating the rules. These guidelines are based on analysis prepared by the [American Council on Education](#).

We would appreciate your assistance in distributing this memorandum and the accompanying form to faculty and staff as appropriate.

Lobbying Disclosure

While the majority of the lobbying activity in which Vanderbilt University engages is conducted by the [Office of Federal Relations](#) in Washington, DC, Vanderbilt has historically encouraged faculty and staff to communicate with our representatives on Capitol Hill and in Executive Branch agencies on issues of particular concern to them and the university – sometimes individually, but often through their professional organizations. This communication could be in person, over the phone/virtually, or in writing.

We are not seeking to end this practice – indeed, Members of Congress and their staff are keenly interested in meeting with Vanderbilt experts on a range of issues, from financial aid to research priorities. Furthermore, our Federal Relations staff relies on our campus experts to illustrate and explain our federal priorities. Our faculty and administrators have tremendous credibility and are consistently Vanderbilt's best representatives in meetings with federal policymakers.

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However, considering the ethics rules, **lobbying activity by any Vanderbilt University employee on behalf of the university or using university resources (including time, computers, email addresses, etc.) must be documented and reported.**ⁱ Lobbying activitiesⁱⁱ generally include a communication with a covered official asking for specific action. Communications can be oral or written and include in-person or virtual meetings, telephone calls, letters, and emails. Covered officials include covered Executive Branch officials,ⁱⁱⁱ Members of Congress, or congressional staff; program officers and managers are generally not covered officials. A specific action could include asking for federal funding, requesting specific legislative action, or attempting to influence the position of a federal official on an issue pending before Congress or the Executive Branch.

Lobbying activities by university employees in their capacity as private citizens and not using Vanderbilt resources do not need to be reported.

Faculty and staff are asked to report lobbying activities by completing the following Lobbying Disclosure Form and returning it to Alex Shea (alex.shea@vanderbilt.edu) in the Division of Government and Community Relations by the following deadlines, so that it can be included in the university's quarterly lobbying disclosure reports:

- April 10th – for lobbying activities that take place between January 1 and March 31
- July 10th – for lobbying activities that take place between April 1 and June 30
- October 10th – for lobbying activities that take place between July 1 and September 30
- January 10th – for lobbying activities that take place between October 1 and December 31

The form is intended to capture the following information:

- the date of all such meetings or communications;
- who the meeting or communication was with;
- the subject discussed (e.g., “funding of Alpha Project research” or “amending the immigration bill to promote access by foreign students” or “increasing the budget of the National Endowment for the Humanities”);
- the approximate length of time of each meeting; and
- the costs associated with each meeting, including travel costs to Washington, DC (or a *pro rata* share of those costs when the travel involves other, non-lobbying activities), if appropriate, and a portion of salary and benefits.

In addition, university faculty and staff are encouraged to notify the Office of Federal Relations before, if possible, they engage in federal lobbying activities on behalf of the university. Federal Relations staff are happy to help arrange meetings and provide guidance on the most effective way to communicate a message to federal lawmakers or their staff.

Vanderbilt University conducts its advocacy activities in a very transparent and professional manner; considering the ethics rules, it is essential that we carefully and fully report all such activities by the university and its employees to the House and Senate.

Congressional Rules Related to Gifts, Meals, and Travel

1. **Vanderbilt University, and individuals employed by the university and acting on our behalf, cannot provide gifts to Members of Congress and their staff with a value of less than \$10.** This eliminates virtually any souvenir that might be offered at a meeting, conference, or special event, such as a t-shirt, hat, or coffee mug. Please check with the [Office of Federal Relations](#) if you have

any questions.

2. **Vanderbilt University cannot pay for any meal, food, or drink with a Member of Congress or their staff.** While there are certain prescribed exceptions, please check with the Office of Federal Relations in advance of extending an invitation so we can ensure that the meal is not otherwise prohibited.
3. **Vanderbilt University can invite Members of Congress and their staff to certain public events at which food is served, and for which the Member's or staff's presence could be considered directly related to their official duties.** Please alert the Office of Federal Relations before such invitations are extended so we can verify that the event is not prohibited and can coordinate the many requests that Vanderbilt makes of our Congressional delegation and other Members of Congress.
4. **Vanderbilt University cannot provide Members of Congress or their staff with complimentary tickets to sporting events, concerts, or other activities for which an admission fee is charged.** All Members and their staff must pay the face value of the ticket. We ask that any requests for tickets from Members of Congress or their staff, or invitations to attend a game or performance, be directed to the Office of Federal Relations for response.
5. **Finally, there are complex rules concerning sponsorship of travel (transportation and lodging) involving Members of Congress and their staff.** Vanderbilt University typically does not sponsor congressional travel, but it is an area of great sensitivity with significant advance warning necessary for paperwork and approval. All requests for travel sponsorship involving Members of Congress or their staff should be handled through the Office of Federal Relations to ensure compliance with these ethics rules.

Thank you for your assistance in ensuring Vanderbilt complies with these rules. Please feel free to distribute this message to your colleagues as needed.

Questions? Please contact:

Christina West
Associate Vice Chancellor for Federal Relations
christina.west@vanderbilt.edu
202-216-4370

Alex Shea
Director of Business Operations, Division of Government and Community Relations
alex.shea@vanderbilt.edu
202-216-4373

ⁱ Required reporting does not include lobbying activities by students.

ⁱⁱ For additional information, please refer to the “lobbying activities” definition found in [\[2 U.S.C. Sec. 1602\]](#) of the Honest Leadership and Open Government Act of 2007 [P.L. 110-81, 2 U.S.C. Sec. 1601 et seq.].

ⁱⁱⁱ “Covered Executive Branch official” includes: the President, the Vice President, Officers and employees of the Executive Office of the President, any official serving in an Executive Level I through V position, any member of the uniformed services serving at grade O-7 or above, and any Schedule C (political) employees. It does not typically include program managers or officers.



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Lobbying Disclosure Form

Due to federal lobbying disclosure rules, all Vanderbilt employees who engage in lobbying activities using university resources (including time, computers, email addresses, etc.) or on behalf of the university and its federal advocacy priorities must report and disclose these activities to the university so that it can be included in our quarterly lobbying disclosure reports. There are substantial civil and criminal penalties for failing to file such reports in a timely and accurate manner.

Lobbying activities that need to be reported generally include a communication with a covered official asking for specific action. Communications can be oral or written and include in-person or virtual meetings, telephone calls, letters, and emails. Covered officials include covered Executive Branch officials, Members of Congress, or congressional staff; program officers and managers are generally not covered officials. A specific action could include asking for federal funding, requesting specific legislative action, or attempting to influence the position of a federal official on an issue pending before Congress or the Executive Branch.

Lobbying activities made by university employees in their capacity as private citizens and not using Vanderbilt University resources do not need to be reported.

If you have engaged in lobbying activities this quarter, please complete the following form:

1. Reporting period: (indicate one)

1st Quarter – January 1 and March 31

3rd Quarter – July 1 and September 30

2nd Quarter – April 1 and June 30

4th Quarter – October 1 and December 31

2. Name/Title:

3. Date(s) of lobbying activity(ies):

4. Name(s) of covered official(s) who was/were contacted (Member and/or staff):

5. Subject(s) discussed:

6. The length of time spent lobbying:

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- 7. Costs associated with each lobbying activity:**
- a. Direct costs (Pro-rata share of direct costs when travel involves other, non-lobbying activities):**

 - b. Portion of salary/benefits for actual time spent in communication (office visits, telephone calls, email) with the covered official(s) (Member and/or staff); this does not include travel time to or from a meeting:**

This form should be completed and returned to Alex Shea (alex.shea@vanderbilt.edu) in the Division of Government and Community Relations by the following deadlines, so that it can be included in the university's quarterly lobbying disclosure reports:

- April 10th – for lobbying activities that take place between January 1 and March 31
- July 10th – for lobbying activities that take place between April 1 and June 30
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- January 10th – for lobbying activities that take place between October 1 and December 31

If you have any questions about the reporting requirements, please feel free to contact us. Vanderbilt University conducts its advocacy activities in a very transparent and professional manner; considering the ethics rules, it is essential that we carefully and fully report all such activities.

Questions? Please contact:

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