



University of Illinois System Lobbying Disclosure Guidance and FAQs

In compliance with the federal [Lobbying Disclosure Act \(LDA\)](#), the University of Illinois System must provide a full and timely disclosure of its lobbying activities. The LDA requires the system to register and file quarterly reports on federal lobbying activities with the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate (2 USC Sections 1603-1604). In these quarterly reports, the system is required to provide detailed information regarding the specific issues on which it lobbied and a good-faith estimate of the total expenses incurred in connection with its lobbying activities.

To ensure compliance with the LDA, it is essential that every employee who engages in lobbying on behalf of the system, as defined by the Act, complete a [lobbying disclosure form](#) each time contact is made with certain senior federal officials or staff, as defined in the LDA. This form should be submitted to the system's Office of Governmental Relations (OGR) promptly following such activity. If you have not had any such interaction with federal officials or staff, you do not need to complete the lobbying disclosure form. Please note that federal funds or grant money may not be used for lobbying activities.

Lobbying Disclosure Form Due Dates:

- Quarter 1: January 1 through March 31
- Quarter 2: April 1 through June 30
- Quarter 3: July 1 through September 30
- Quarter 4: October 1 through December 31

The following pages contain definitions and Frequently Asked Questions. You can find more resources and information [here](#).

If you have questions regarding the federal lobbying disclosure process, please contact Grace Hart, OGR's federal relations specialist, by email at gkhart2@uillinois.edu or by phone at (217) 300-5373.

Definitions

The term “**lobbying activities**” means any lobbying contacts 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 its preparation, for use in making contacts and coordinating the lobbying activities.

The term “**lobbying contact**” means any oral, written, or electronic communication to a covered official that is made on behalf of the U of I System regarding:

- the formulation, modification or adoption of federal legislation (including legislative proposals);
- the formulation, modification or adoption of a federal rule, regulation, executive order or any other program, policy or position of the United States Government;
- the administration or execution of a federal program or policy (including the negotiation, award or administration of a federal contract, grant, loan, permit or license); or
- the nomination or confirmation of a person for a position subject to confirmation by the Senate.

The term “**covered legislative branch official**” includes:

- a member of Congress;
- An elected officer of either the House or the Senate;
- An employee, or any other individual functioning in the capacity of an employee, who works for a member, committee or leadership staff of either the Senate or House, a joint committee of Congress, a working group or caucus organized to provide services to members, and any other legislative branch employee serving in a position described under Section 109(13) of the Ethics in Government Act of 1978 ([5 U.S.C. Appendix § 109\(13\)](#)).

The term “**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;
- Schedule C employees.

The United States Government Policy and Supporting Positions, known as the Plum Book, defines Schedule C positions: <https://www.govinfo.gov/content/pkg/GPO-PLUMBOOK-2016/pdf/GPO-PLUMBOOK-2016.pdf>

Frequently Asked Questions (FAQs)

What is considered a reportable lobbying activity?

The term “lobbying activity” includes any oral, written or electronic communication to a covered official that is made on behalf of the University of Illinois System. It also includes efforts in support of these contacts, including preparation, research or other background work.

Any lobbying activity conducted with the president, vice president, political appointees in the executive branch, any member of Congress, or any employee who works for a member of Congress, congressional committee or leadership staff must be reported to the Office of Governmental Relations for disclosure.

Who is authorized to make official lobbying contacts on behalf of the U of I System?

Only the president, chancellors, vice presidents, vice chancellors, federal relations staff, deans, senior administrators and their designees are authorized to make official lobbying contacts on behalf of the system.

Do I need to report every time I interact with my program sponsor about my federal grant?

Probably not. In general, program managers or grant administrators are not covered executive branch officials. If you have any questions about whether an individual is considered a covered official, please contact the Office of Governmental Relations.

I traveled to Washington, D.C., with my professional association and visited with members of Congress to discuss the association’s legislative priorities. Do I need to report this time and expense to the Office of Governmental Relations?

No, as this lobbying activity was conducted on behalf of the association, not the U of I System. U of I System administrators, faculty and staff are only required to report lobbying efforts made on behalf of the system. You can find U of I System guidelines regarding interactions with government officials [here](#).

I attended a conference in Washington, D.C. While I was there, I met with members of Congress and their staff to lobby on behalf of the U of I System. How should I report this time and expense?

The time and expenses spent directly on lobbying must be reported. This includes travel time to and from the meetings, expenses related to travel (such as taxi fare), and time spent in, and preparing for, meetings. You can find U of I System guidelines regarding interactions with government officials [here](#).

I have been asked to testify before Congress. Do I need to report this time and expense?

No. It is not considered a lobbying activity if you were asked to testify by a member of Congress or a congressional committee, or if you provide a written response to a request for information. However, the Office of Governmental Relations can provide support if you let us know in advance.

Does my work as a member of a federal advisory committee constitute lobbying?

No. Communications made in the course of participation in an advisory committee are not considered lobbying.

Does the LDA cover lobbying of state and local officials?

No, this law only governs the lobbying of federal officials. If you have any questions regarding state or local lobbying activities, please contact Jennifer Creasey, senior director of state relations, by email at jcreasey@uillinois.edu or by phone at (217) 333-1086.

Who should I contact if I have questions about the LDA or the lobbying disclosure process?

You can contact Grace Hart, federal relations specialist, by email at gkhart2@uillinois.edu or by phone at (217) 300-5373.