



To: Deans, Directors and Department Heads

From: Christina West
Director of Federal Relations

Subject: Federal Lobbying Disclosure Requirements

Date: January 2009

With the 111th Congress recently sworn in, we want to remind you that Congress enacted a number of lobbying and ethics reforms in response to several high-profile corruption and bribery cases. As an institution that employs registered lobbyists to advance and safeguard its considerable interests in the nation's capital, Vanderbilt University is now required to file quarterly disclosure reports with the House and Senate detailing lobbying activity¹ and associated expenses. There are substantial civil and criminal penalties for failing to file such reports in a timely and accurate manner.

While the majority of the lobbying activity in which Vanderbilt 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 on issues of particular concern to them – sometimes individually, but often through their professional organizations. This communication could be in person, over the phone or in writing.

We are not seeking to end this practice – indeed, Members of Congress and their staffs are keenly interested in meeting with Vanderbilt experts on a range of issues, from financial aid to research priorities to visa policies. 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 national policymakers.

However, in light of the new ethics rules, we have implemented new reporting guidelines such that any direct lobbying by any Vanderbilt employee is documented and reported. Our peer institutions face the same requirements and have put in place procedures to help ensure compliance. We need your assistance with this. All faculty and staff who directly lobby Members of Congress or their staff will be asked to submit a report to Jennie McClendon (jennie.mcclendon@vanderbilt.edu) in the Division of Public Affairs. The report should include not only visits to Capitol Hill, but also any other communications for the purpose of federal lobbying, such as meetings in Nashville, telephone calls, letters and emails.

¹ "Direct lobbying" means any direct contact with Members of Congress or their staffs in which an individual is asking for federal funding, requesting specific legislative action or attempting to influence the position of an elected official on an issue pending before Congress.



The following information should be submitted within 10 days after the end of each quarter:

- 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;
- the length of time spent preparing for each meeting or communication, and
- costs associated with each meeting, including travel costs to Washington (or a pro rata share of those costs when the travel involves other, non-lobbying activities), if appropriate, and a portion of salary/benefits.

We have attached a form to facilitate this reporting; we would appreciate your assistance in distributing this memorandum and the accompanying form to faculty/staff as appropriate. In addition, faculty and staff are encouraged to notify the Office of Federal Relations before, if possible, they engage in federal lobbying activities. We are happy to help arrange meetings and provide guidance on the most effective way to communicate a message to a federal lawmaker or their staff.

If you have any questions about the new reporting requirements, please contact me (christina.d.west@vanderbilt.edu; 202-216-4370) or any of the contacts listed on the enclosed form. Vanderbilt conducts its advocacy activities in a very transparent and professional manner; in light of the recent ethics reforms, it is essential that we carefully and fully report all such activities to the House and Senate.



**Vanderbilt University Office of Federal Relations
Lobbying Disclosure Form**

Due to the current federal lobbying disclosure rules, all Vanderbilt employees who engage in lobbying activity must report and disclose these contacts to the University so that it can be included in the quarterly reports we must file. There are substantial civil and criminal penalties for failing to file such reports in a timely and accurate manner.

“Lobbying activity” refers to any direct contact with Members of Congress or their staffs in which an individual is asking for federal funding, requesting specific legislative action or attempting to influence the position of an elected official on an issue pending before Congress. This would include meetings, telephone calls, letters, faxes or emails.

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

1. Reporting period: (circle one)

1st Quarter 2nd Quarter 3rd Quarter 4th Quarter (calendar year quarters)

2. Name/Title:

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

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

5. Subject(s) discussed:

6. The length of time spent lobbying:

7. Costs associated with each lobbying contact:

- 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 direct communication with Member and/or staff (office visits, telephone calls, email); this does not include travel time to or from a meeting:**

This form should be completed and returned to Jennie McClendon (jennie.mcclendon@vanderbilt.edu) in the Division of Public Affairs within 10 days after the end of each quarter (ie: April 10, July 10, October 10 and January 10).



Vanderbilt University
Office of Federal Relations

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

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