

GUIDANCE FOR OFFICIAL INVITATIONS TO MEMBERS OF CONGRESS AND EXECUTIVE BRANCH OFFICIALS TO CAMPUS FOR AWARD OF HONORARY DEGREES, SPEECHES, OR OTHER EVENTS, INCLUDING RULES REGARDING GIFTS, MEALS, AND TRAVEL

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Following lobbying scandals in the mid-2000s, Congress took steps to strengthen congressional and federal Executive Branch ethics rules. Enacted in 2007, the Honest Leadership and Open Government Act (HLOGA) subjects federal lobbying activities to enhanced disclosure and reporting requirements under the Lobbying Disclosure Act (LDA). HLOGA also included penalties for knowing and willful violation of congressional gift and travel rules, and it requires organizations registered under the LDA to certify twice yearly that no one in the organization has offered anything in violation of these rules.

In addition, Congress and the Executive Branch periodically update their ethics guidance and enforcement mechanisms. For example, the 2025 House Ethics Rules maintain strict prohibitions on gifts with only narrow exceptions for items of nominal value, items that have been specifically exempted, and certain event attendance (see [Highlights of the House Ethics Rules, 2025](#)). Executive Branch appointees remain subject to the baseline Standards of Ethical Conduct (5 C.F.R. part 2635) and agency-specific ethics regulations governing gifts. Institutions should consult directly with the relevant agency ethics official regarding any agency-specific supplemental rules that may apply.

This issue brief is intended to assist ACE members in navigating these ethics requirements, particularly as they relate to official invitations to members of Congress or senior Executive Branch officials to campus for speaking engagements or honorary degrees. Members are encouraged to consult the latest House and Senate ethics guidance—as well as agency-specific rules—to ensure full compliance with current law and best practices. This guidance also outlines rules regarding gifts provided by an institution or an employee of an institution to members of Congress or Executive Branch officials in instances where the federal official is on campus for events other than by official invitation of the institution. Examples of such appearances include when a professor invites an official to speak in a classroom or when a student organization hosts them for a meeting or to participate in a student program.

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DISCLAIMER: This issue brief does not constitute legal advice. It incorporates and reflects high-level observations based on non-exhaustive research and does not analyze any specific factual scenarios. Institutions should examine issues addressed here based on the context and facts of each situation, institutional policies, geographical and political context, and on their own counsel's interpretation of relevant law. This is a fluid environment and topic, including the potential for changes in current law or current enforcement practices.

Visits to Campus by Congressional and Federal Executive Branch Officials

Members of Congress and staff consider it an important part of their official duties to visit with various constituent groups in their states. Given political polarization, systemic misconceptions, and eroded trust that currently strain the relationship between federal policymakers and the higher education sector, campus invitations have never been more vital. It is essential for institutional leaders to bring members of Congress and their staff onto campus to experience daily learning, innovation, and community impact firsthand. Fostering these relationships and deepening policymakers' understanding of the unique challenges facing individual campuses and the vital contributions of the broader higher education community must remain evergreen objectives.

The federal rules applicable to entertaining officials on campus differ depending on whether the institution is public or private, whether the institution is registered under the LDA, and whether the invitee is a member of Congress, congressional staff, political appointee, senior Executive Branch official, or a career federal employee. The rules are not always straightforward and may not seem logical. If an institution has any doubt about the propriety of inviting a federal official to campus or about details surrounding the visit—such as gifts, entertainment, or travel—it is always wise to seek specific legal advice before extending an invitation. Institutions should take great care to ensure that those representing the institution in dealings with federal officials understand federal ethics rules so that no inadvertent violations occur. Institutions should be diligent in understanding and conforming to federal ethics rules to avoid putting a covered federal official in the awkward or embarrassing position of rejecting an inappropriate offer of a gift, entertainment, or travel.

The major federal guidelines that apply to different types of higher education institutions are summarized below.

Public Higher Education Institutions

Gifts to Members of Congress and Staff. Congressional gift rules and HLOGA provide a specific exemption for gifts provided by local and state government entities, including public higher education institutions. Thus, any gifts, meals, entertainment, or honorary degrees offered by a public higher education institution to members of Congress and their staff are generally excluded from the gift restrictions. This exception also applies to tickets to an institution's athletic events; however, a public institution should not be a conduit for tickets provided by a third party. For example, World Series tickets given to a university president by a key alumnus could not then be given by the president to a member of Congress.

Travel Provided to Members of Congress and Staff. Congressional rules consider travel provided by a public higher education institution to be government-sponsored travel and thus exempt from the restrictions that apply to private entities. There is no limitation on the type or length of travel that may be provided. An in-house lobbyist for a public institution may be involved in the trip planning, and no clearance is needed from congressional ethics committees. Public institutions should note, however, that if travel is being provided jointly with a private institution, then the joint invitation must comply with the rules applicable to the private entity.

Gifts to Executive Branch Employees. There is no general exception for gifts received by Executive Branch employees from state or local government entities. Therefore, public universities must comply with restrictions, which have several exceptions allowing receipt of nominal gifts such as coffee and donuts, gifts based on personal friendship, any item of less than \$20 in value (\$50 cumulatively from the same entity in a calendar year), and attendance at widely attended gatherings including receptions and meals where the attendance has been determined to be in the "interest of the agency." An Executive Branch employee may accept an honorary degree from a public higher education institution following a written determination of the ethics officer of the agency "that the timing of the award would not cause a reasonable person to question the employee's impartiality in a matter affecting

the institution.” Employees may also accept meals and entertainment for themselves and their family members at the event where the presentation takes place. Acceptance of meals or free admission to a conference sponsored by a public institution where the federal employee is a speaker or program participant is not considered a gift but rather is viewed as a customary and necessary part of the performance of their assignment.

Travel Provided to Executive Branch Employees. Travel, subsistence, and related expenses accepted by an agency as reimbursement in connection with an employee’s attendance at an out-of-town meeting or similar function related to their official duties are generally allowed, pursuant to federal guidelines. If the ethics officer has approved the campus visit for receipt of an honorary degree or for a speaking engagement, travel expenses may be offered or reimbursed.

Private Nonprofit Institutions with No Lobbyist

Gifts to Members of Congress and Staff. For a private higher education institution not registered under the LDA and not retaining outside lobbyists, the relevant congressional gift rules are also governed by HLOGA. Those rules generally state that members of Congress and their staff should not accept gifts but also set forth more than 20 exceptions to the general gift ban. Among the exceptions are gifts or meals valued at less than \$50, free admission to widely attended gatherings, and nominal food items provided at typical receptions. Officials may also accept honorary degrees, books, invitations to charitable events, and gifts based on personal friendship. Tickets to athletic events may be accepted as long as the value is less than \$50. These gift rules and exceptions to the rules also apply to any personal gifts offered by an individual affiliated with the institution, such as a professor, administrator, student, or student group.

Travel Provided to Members of Congress and Staff. Private colleges and universities that do not employ or retain a registered federal lobbyist or foreign agent may, in some circumstances, provide travel to members of Congress and their staff for officially connected events, subject to the House and Senate travel and gift rules. In all cases, preapproval from the appropriate ethics committee is required. The pretravel submission must include a detailed agenda and estimated costs. Posttravel disclosure must be filed after the trip, and institutions should expect that all travel details will be publicly available. Travel expenses should generally be comparable to the maximum per diem rates for official federal government travel published at www.gsa.gov/perdiem. A posttrip report including all expenses must be submitted to the appropriate congressional ethics committee.

Under House rules, limited recreation may be included only if it is incidental to the official purpose of the trip and complies with the general gift rules stated above, including the applicable dollar limits. House rules restrict the use of firstclass or charter aircraft to rare, preapproved circumstances under the committee’s travel regulations.

Under Senate rules, privately sponsored travel must be primarily for official business and may not be substantially recreational in nature. The use of private or charter aircraft is prohibited for privately sponsored trips. Alcohol and entertainment are generally not considered necessary travel expenses and may be provided only in narrow circumstances consistent with Senate travel and gift guidance. Because both the House and Senate periodically revise their travel regulations and forms, institutions should confirm the latest requirements and, when in doubt, consult the relevant ethics committee before extending any travel offer to members or staff.

Gifts to Executive Branch Employees. Gifts to Executive Branch employees are generally restricted, with limited exceptions based on the regulations and guidance of the Office of Government Ethics (OGE). These rules apply to institutions regardless of whether they employ or retain a lobbyist. Political appointees of past presidential administrations have faced additional restrictions pursuant to an ethics pledge required of political appointees. For example, the Obama, first Trump, and Biden administrations required all political appointees to sign an ethics pledge outlining additional ethics restrictions beyond those set forth in OGE regulations and guidance. Common exceptions

to the standard gift restrictions include modest items of food and refreshment not part of a meal (e.g., coffee and donuts); gifts based on a personal friendship; items valued at \$20 or less (not exceeding \$50 in a calendar year from the same source); and free attendance at widely attended gatherings, including receptions and meals, when the agency determines in advance that the employee's attendance is in the interest of the agency.

An Executive Branch employee may accept an honorary degree from a higher education institution under the awards/honorary degrees exception, based on a written determination by the agency ethics official that acceptance will not cause a reasonable person to question the employee's impartiality in a matter affecting the institution. In connection with the honorary degree event, employees may accept meals and related hospitality provided to attendees as part of the event and, where authorized by the agency, free attendance for an accompanying spouse or guest when customary for the sponsor to offer. When the employee is an official speaker or participant, free attendance, including meals served at the event, for the day of participation is generally permissible as part of performing official duties. Travel expenses from nonfederal sources are separately regulated and may be accepted only with required statutory and agency approvals.

Travel Provided to Executive Branch Employees. Travel, subsistence, and related expenses may be accepted by an agency on behalf of an employee in connection with attendance at a meeting, speaking engagement, or similar function related to official duties, subject to applicable federal guidelines. Under the General Services Administration's Federal Travel Regulation and agency-specific policies, such nonfederal sourced travel payments must be authorized in advance by the agency. If the agency ethics official has approved the campus visit—whether for an honorary degree, a speaking engagement, or participation in a similar event—reasonable travel expenses may be offered by the institution. Institutions should be prepared to provide the agency with details regarding the event, its purpose, and estimated costs to facilitate the approval process.

Private Nonprofit Institutions That Employ or Retain a Lobbyist

Gifts to Members of Congress and Staff. A private higher education institution that employs or retains a registered federal lobbyist must comply with the stricter congressional gift rules applicable to gifts from lobbyists and lobbying organizations. As a general matter, members and staff may not accept gifts from such sources except under narrow, specifically defined exceptions (e.g., certain widely attended events offered by the event organizer, gifts based on personal friendship, informational materials, or other limited categories authorized by the ethics committees). The typical "\$20/\$50" de minimis gift exception does not apply to gifts from registered lobbyists or lobbying organizations. In instances where a member of Congress or staff visits the campus of a private institution that is registered under the LDA but not at the official invitation of the institution, gift rules still apply. Such examples might include speaking to a class at the invitation of a professor, meeting with a student group, participating in a policy debate, or simply visiting friends who work at the institution. A private institution registered under the LDA must certify twice yearly that no employee of the institution has offered any gifts in violation of congressional gift rules. Thus, a professor, administrator, or other staff member should be mindful of the rules and exceptions outlined in the paragraph above when offering any gifts, including meals.

Travel Provided to Members of Congress and Staff. Private institutions that employ or retain a lobbyist may sponsor officially connected travel only under tighter limits. Preapproval from the appropriate congressional ethics committee is required—based on an agenda and estimated costs submitted in advance—and a posttrip report must be filed. Under both House and Senate rules, travel sponsored by an entity that employs or retains a lobbyist is generally limited to a single calendar day of events, with tightly restricted lodging. Recreation unrelated to the official purpose may not be included as part of the trip. Lobbyist involvement in planning or arranging the trip must be no more than de minimis under committee regulations, and lobbyist accompaniment is restricted. Use of noncommercial aircraft is

tightly restricted: in the House, firstclass or charter travel is permitted only in rare, preapproved circumstances; in the Senate, private or charter aircraft may not be used for privately sponsored trips.

Gifts to Executive Branch Employees. Gifts to Executive Branch employees are generally restricted. Exceptions (e.g., modest refreshments, personal friendship, widely attended gatherings, and certain awards/honorary degrees with agency ethics approval) may apply, but political appointees can be subject to additional limits under current ethics pledges on gifts from lobbyists and organizations that employ them. Specific agency supplemental rules may also be stricter.

Travel Provided to Executive Branch Employees. Travel, subsistence, and related expenses from a nonfederal source may be accepted by the agency on behalf of an employee for officially related events only with advance agency authorization under 31 U.S.C. § 1353 and the Federal Travel Regulation. If the agency ethics official approves the campus visit (e.g., for an honorary degree or speaking engagement), reasonable travel may be offered, subject to agency approval of the nonfederal source payment. These rules apply **regardless of whether the institution employs or retains lobbyists.**

Honoring Events by Public and Private Institutions Registered Under LDA

Institutions registered under the Lobbying Disclosure Act must file semiannual contribution reports (LD-203s) certifying that no employee of the registrant has offered any gifts in violation of congressional gift rules and disclosing expenses incurred in “honoring” a member of Congress or Executive Branch official. These honoring activities could include presenting an award such as a distinguished alumni or “Champion of Higher Education” award, an honorary degree, a reception in Washington DC, or allowing a member of Congress to host an event on campus such as Congressman XYZ’s Agriculture Forum. Whether a specific event rises to the level of an “Honoring Event” will depend on the facts of each activity. If an event meets the criteria of an “Honoring Event,” the registered lobbying entity must disclose in its semiannual LD-203 report the costs associated with the event, including rental costs, catering costs, any special security expenses, and the cost of any commemorative item given to the honoree. Institutions should consult with the LDA Guidance document for further explanation regarding disclosure of such costs.

Useful Links Regarding Congressional and Executive Branch Ethics Rules

- [House Committee on Ethics](#) (formerly Standards of Official Conduct)
 - » [Travel Regulations](#) (House)
 - » [Highlights of the House Ethics Rules](#) (overview)
- [U.S. Senate Select Committee on Ethics](#)
 - » [Regulations and Guidelines for Privately Sponsored Travel](#)
 - » [Travel Portal/Overview](#)
- [U.S. Office of Government Ethics](#) (OGE)
- [Lobbying Disclosure Act Guidance](#)