



What Do the New Rules on Lobbying Congress Signify for Colleges and Universities?

Recently amended rules on lobbying Congress and Congressional ethics are consequential for colleges, universities, and higher education groups. Key provisions include these:

- (1) Public colleges and universities remain exempt from Congressional gift and travel restrictions. Foundations and other nongovernmental entities are not exempt.
- (2) Preexisting restrictions on gifts to members of Congress and Congressional staff continue to apply to independent colleges and universities, and to higher education groups, that do not employ or engage a lobbyist. New, stricter rules ban most gifts from independent institutions that do employ or engage a lobbyist, and ban most such gifts from institutional employees.
- (3) An independent institution, even if it has a lobbyist, may sponsor certain events—including a “widely-attended” function or a fundraising event for a 501(c)(3)—and pay the admission fee or other costs for members of Congress or staff to attend for free.
- (4) House and Senate gift rules contain other limited exceptions, such as for gifts of little intrinsic value and gifts based on personal friendship.
- (5) The House exempts independent colleges and universities from Congressional trip-sponsorship rules.
- (6) A Senate exception for 501(c)(3) organizations exempts most independent colleges and universities and some higher education groups from compliance with Senate trip-sponsorship rules.
- (7) Special restrictions apply to Congressional travel in private aircraft.
- (8) Lobbyists are subject to more-stringent registration, reporting, and disclosure rules.
- (9) New rules regulate practices such as earmarks and employment of lobbyists.

(“Lobbyist” as used in this memorandum includes persons who are or should be registered under the Lobbying Disclosure Act. This memorandum addresses only rules related to Congressional lobbying and ethics. Compliance with these rules may in some situations not ensure that the institution is in compliance with other laws and regulations, such as tax laws, state lobbying and ethics laws, the Foreign Agents Registration Act or legal requirements regarding campaign contributions. *See ACE, [Political Campaign-Related Activities of and at Colleges and Universities](#), November 2007)*

Lobbying and ethics reform has been a priority in the current Congress. House Resolution 6, passed in January 2007, amended House rules. The changes became effective by March 2007. Thirteen days after Resolution 6 passed, the Senate passed S. 1, which amended Senate rules and included statutory changes, thus requiring House approval and the President’s signature. On July 31, the House passed the Honest Leadership and Open Government Act of 2007 (“HLOGA”), an amended version of S. 1. Two days later, the Senate concurred, and President Bush signed HLOGA into law on September 14, 2007. *See Pub. L. 110-81, 121 Stat. 735.* All HLOGA provisions are now effective. This memorandum supersedes ACE’s March 2007 and September 2007 memoranda on these reforms. Revisions take into

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account a new version of the House Ethics Manual, issued by the House Committee on Standards of Official Conduct, as well as rules proposed by the Federal Election Commission and recent interpretive guidance from the Senate Select Committee on Ethics, the Clerk of the House, and the Secretary of the Senate (available at www.house.gov/ethics, ethics.senate.gov, lobbyingdisclosure.house.gov, and www.fec.gov). Further clarification is likely forthcoming and will also warrant close consideration.

The amended rules merit careful attention. For the first time ethics rules will apply *directly* to lobbyists, not just to members of Congress and Congressional staff. HLOGA also increases to \$200,000 the maximum fine for noncompliance with lobbying and ethics rules, and impose a new criminal penalty (up to five years imprisonment) for knowing and corrupt violations. Disclosure requirements and online databases the new law mandates will facilitate yet more scrutiny in the prevailing climate of acute sensitivity to interactions with Congress.

This memorandum provides general background on the changes to the Congressional lobbying and ethics rules and is not legal advice. The institution's counsel should be consulted as questions arise.

(1) Public colleges and universities remain exempt from Congressional gift and travel restrictions. Foundations and other nongovernmental entities are not exempt.

The amended House and Senate rules continue to allow gifts and travel paid for by federal, state, and local governments, including public colleges and universities. Thus, for instance, a state university may provide a member of Congress with tickets to a home football game without running afoul of these rules. But this exception does not apply to nongovernmental entities such as private foundations that raise funds for public universities. And even public universities may not lawfully provide a gift in exchange for past or future official action by a member of Congress or act as a conduit for a private entity's gift. Nor may a member of Congress accept a gift from a public university's outside lobbyist, even if the lobbyist receives reimbursement from the institution.

(2) Preexisting restrictions on gifts to members of Congress and Congressional staff continue to apply to independent colleges and universities, and to higher education groups, that do not employ or engage a lobbyist. New, stricter rules ban most gifts from independent institutions that do employ or engage a lobbyist, and ban most such gifts from institutional employees.

Under the amended rules, if a higher education group or an independent college or university does not employ or engage a lobbyist, it may provide a gift, which includes anything of monetary value such as a meal, to a member of Congress or staff, if the gift's value is less than \$50. Under no circumstances may a member or staff solicit a gift. For each member and staffer, there is an annual gift maximum of \$99.99, but gifts valued at less than \$10 do not count toward that limit. Gifts are generally valued at retail price. Cash gifts or cash equivalents such as gift cards are prohibited. A ticket to a sporting or entertainment event is valued at its face amount. Tickets with no face amount are valued at the face amount of the most expensive ticket to the event.

A significant new feature of the amended rules is a ban on most gifts from a "private entity"—such as an independent college or university or a higher education group—that employs or engages a lobbyist. This ban generally covers gifts to members of Congress and staff, regardless of whether the gifts come from the institution, its lobbyist or any other institutional employee. Thus, for instance, a college ordinarily cannot reimburse its president who pays for a senator's lunch. Nor could the president, with intent to avoid the ban, use personal funds to pay for the lunch. Special rules that apply to gifts based on personal friendship, and other exceptions, are addressed below.

(3) An independent institution, even if it has a lobbyist, may sponsor certain events—including a “widely-attended” function or a fundraising event for a 501(c)(3)—and pay the admission fee or other costs for members of Congress or staff to attend for free.

House and Senate gift rules apply when an independent institution invites a member of Congress or staff to attend an event for free. Certain exceptions, however, should exempt gifts of free attendance to many events higher education institutions sponsor. Although the precise contours of the House and Senate exceptions vary, the general provisions are similar.

- **Widely-attended events.** An independent institution—even if it employs or engages a lobbyist—may pay admissions fees, including food costs, for a member of Congress or Congressional staff to attend a convention, dinner or the like if (a) the event is related to official congressional duties, (b) at least 25 people—excluding members of Congress, staff, and their spouses or companions—are reasonably expected to attend, and (c) the event is open to members of the public, to individuals “throughout a given industry or profession” or to a range of persons interested in the subject-matter. For this exception to apply, the invitation must come directly from the event sponsor. Thus, a college or university may not pay for a member of Congress to sit at a table it purchases for another organization’s event. Although the exact scope of the “given industry or profession” requirement is not specified, enumerated examples of permissible “widely-attended” events include a membership meeting of a trade association and exclude a luncheon attended solely by employees of a particular department. An invitation to a sporting event, movie or show will rarely be acceptable under this exception, because the invitation likely would bear no relation to a member’s official duties.
- **Educational events (House only).** The House, but not the Senate, has granted a general waiver for universities, foundations, think tanks, and similar nonprofit, non-advocacy organizations to provide free attendance for members and staff at lectures or seminars that do not qualify as widely-attended events but are “educational” in nature. Meals in connection with such an event are permitted unless the session includes discussion of legislation or legislative strategy.
- **Charity events.** The amended rules define “charity event” as a lunch, dinner, golf tournament or the like the primary purpose of which is to raise funds for a 501(c)(3) organization. Thus, an independent college, university or higher education group that is a 501(c)(3)—even one that employs or engages a lobbyist—may pay the costs for a member of Congress or staff to attend for free most fundraising events it sponsors. The scope of this exception, too, is not specified. Under House guidance, for instance, the exception applies to “special fundraising performances,” but not “regular performances,” at a 501(c)(3)’s theater. This exception also prohibits members or staff to partake of food or refreshment at charity events unless provided to “all or substantially all other attendees.” Thus, a member or staffer presumably could not attend without charge most if any VIP dinners that follow a charity reception.¹
- **Small constituent-events.** A group composed primarily of a member’s constituents generally may pay the costs for that member or his staff to attend its meetings, receptions or the like. Senate rules ban lobbyist participation, limit the cost of any meal to less than \$50, and require attendance by at least five constituents and an in-state location. House rules do not contain an attendance threshold or a location restriction but require events to be open to members of a constituent organization as opposed to only officers or board members. Both House and Senate rules, thus, exempt from the gift restrictions on-campus meetings between a member of Congress and a few faculty or students who are his constituents.

¹ House Resolution 6 limited this exception to independent institutions without a lobbyist. In May 2007, the House passed Resolution 437, which expanded the exception to institutions that employ or engage a lobbyist.

- **Free receptions with food, or refreshments, of nominal value.** An independent institution may invite members of Congress and staff to attend a business meeting or reception that does not require an admission fee, but the gift restrictions preclude food or refreshments unless of nominal value. Thus, a college may host a reception for staffers at which is provided the type of food usually offered at receptions (e.g., appetizers) or morning meetings (e.g., coffee, juice, pastry or bagels). The number of attendees is immaterial, but the House Committee on Standards of Official Conduct has clarified that this exception does not permit a lobbyist or an employee of an institution that has a lobbyist to pay for food or refreshment for a House member or staff in a one-on-one setting.

(4) House and Senate gift rules contain other limited exceptions, such as for gifts of little intrinsic value and gifts based on personal friendship.

Among the other exceptions for gifts from independent institutions, whether or not they employ a lobbyist, are these:

- **Reimbursement by members of Congress or staff.** The gift restrictions do not apply if a member of Congress or staffer reimburses a donor for the gift's fair market value. But a member or staff may not "buy down" an expensive meal by paying the amount in excess of \$49.99. Instead, he must pay the entire amount unless the gift is "naturally divisible." For instance, a member who receives multiple theater tickets may accept one or more valued less than \$50 and pay market value for or decline the rest.

- **Gifts of little intrinsic value.** An independent college is permitted to give a baseball cap, greeting card or T-shirt, but other items must be valued less than \$10. For instance, a coffee mug valued at \$12 is not within this exception. An independent college may not provide numerous gifts of little intrinsic value to the same member or staffer.

- **Home-state products.** Institutions may donate to a member of Congress goods produced in the member's home state for display or free distribution to visitors to the member's office. Item distributed must be of minimal value (e.g., candy bars or apples). Senate rules provide that donors to senators or staff must be the producers or distributors of such goods. House rules are not expressly so limited.

- **Gifts based on personal friendship.** This exception permits an employee of a college or university to pay with personal funds for a dinner with a member of Congress if, for instance, the two individuals were college roommates and have previously bought meals for each other. Where the value of a personal-friendship gift exceeds \$250, written prior approval from the House Committee on Standards of Official Conduct or the Senate Select Committee on Ethics must be obtained. The exception does not permit a university employee to pay for a meal for a staffer he considers a "friend" but does not see socially. In light of ambiguities in this exception, caution in its use appears prudent.

- **Honorary degrees and awards.** An independent college or university may grant an honorary degree to a member of Congress and provide travel, food, and entertainment in connection with the degree grant. This exception also applies to a "bona fide" non-monetary, public service award—i.e., an award that is part of an established program and made on a regular basis with specific, written criteria.

- **Books and other informational materials.** Independent institutions and employees may provide informational materials—such as books, articles, videotapes, periodicals, and the like—to a member of Congress or staff. Such materials may not, however, be sent to the home of a member or staff. Multiple copies may be provided to a member or staff only if intended for distribution to a particular audience and

not for unrestricted use. In addition, only the distributor or publisher of a periodical may provide a subscription to a member or staffer.

- **Commemorative items.** An independent institution may present a member or staffer with a plaque, trophy, framed photo, figurine or other item that (a) does not possess significant utilitarian or artistic value and (b) has some commemorative feature (e.g., the name of the member or staffer is inscribed or engraved). The presentation must be in person.
- **Political contributions.** Gift restrictions do not apply to contributions lawfully made under the Federal Election Campaign Act or for a state or local campaign.
- **Widely-available benefits.** For instance, an independent university may provide a scholarship to a staffer for a masters program if all students in the program are eligible for such scholarships. Similarly, members and staff who are alumni of a college may accept reduced-price travel benefits available to anyone who belongs to the college's alumni association.

(5) The House exempts independent colleges and universities from Congressional trip-sponsorship rules.

The amended House rules significantly limit privately-sponsored travel for members of Congress and staff, but exempt trip sponsorship “directly” by “institutions of higher education” as defined in Section 101 of the Higher Education Act (i.e., an accredited, degree-granting postsecondary education institution). Under this exception, lobbyists for colleges and universities may organize, request or arrange such trips and accompany members and staff in transit. (As stated above, public colleges and universities are also exempt from trip-sponsorship restrictions under the exception for governmental entities.)

For an entity that does not qualify as a higher education institution, such as an association of colleges, a foundation or an accreditor, House travel rules—similar to House gift restrictions—turn on whether the entity employs or engages a lobbyist. If the entity does not have a lobbyist, it may sponsor a trip, but no lobbyist, even one hired or retained by another entity, may arrange the trip or accompany the member or staffer. By contrast, trip sponsorship by an entity (other than a higher education institution) that has a lobbyist is forbidden (subject to an exception for travel to a one-day event such as a meeting or speech, if lobbyists have no more than *de minimis* role in the arrangements and do not accompany the member or staffer on the trip).

The House Committee on Standards of Official Conduct must pre-approve any sponsored travel, including trips arranged by higher education institutions. The member or staffer must show that the trip is related to official responsibilities and that the sponsor has a defined organizational interest in the trip's purpose and the location to be visited. The Committee has issued guidelines on what expenses are considered reasonable. For example, when events are arranged without regard to Congressional participation (e.g., trade associations' annual meetings), members and staff may accept lodging and meals that are similar to what other attendees receive or purchase. More justification is necessary for fact-finding trips and other events organized specifically for Congressional participants. For all privately-sponsored travel, the trip sponsor must pre-certify that:

- No part of the trip will be financed by a lobbyist;
- The sponsor does not retain or employ a lobbyist, or the trip is covered by the exception for higher education institutions or one-day events;
- The sponsor did not accept funds from another source targeted to finance the trip; and

- Unless the sponsor is a higher education institution, a lobbyist will not accompany the traveler on any part of the trip and did not plan the trip.

The trip-sponsor pre-certification form and pertinent instructions are available on the House website (available at www.house.gov/ethics).

(6) A Senate exception for 501(c)(3) organizations exempts most independent colleges and universities and some higher education groups from compliance with Senate trip-sponsorship rules.

Whereas House rules expressly exempt higher educational institutions from the trip-sponsorship rules, Senate rules instead exempt 501(c)(3) organizations from the trip-sponsorship rules and thereby also cover most colleges and universities, as well as some higher education groups. The Senate 501(c)(3) exception is less robust than the House exception for higher education institutions. It does not permit lobbyists to accompany senators or staff on, or to organize, such trips, except in a *de minimis* way. As in the House, there must be a direct relationship between the sponsor and the trip and, before accepting privately-sponsored travel, a senator or staffer must receive approval, here from the Senate Select Committee on Ethics, and pre-certification from the trip sponsor. Reasonableness guidelines similar but not identical to those in the House also apply. For instance, House trips within the continental United States cannot exceed four days, but the Senate maximum is three days. The trip-sponsor pre-certification form and pertinent instructions are available on the Senate website (available at ethics.senate.gov).

A non-501(c)(3) entity that does not have a lobbyist may sponsor travel for senators or staff, but lobbyists may not accompany the senator or staffer or plan the trip, except in a *de minimis* way. By contrast, non-501(c)(3) entities that do employ or engage a lobbyist are forbidden to sponsor travel, subject to an exception similar to the House's for one-day trips.

(7) Special restrictions apply to Congressional travel in private aircraft.

Senate rules prohibit private sponsorship of travel aboard private aircraft. Moreover, senators, their staff, and candidates for Senate must pay charter rates for travel on private aircraft except in limited circumstances. House rules, which are stricter, essentially forbid all travel on private or corporate planes by members, staff, and candidates for the House. In both Senate and House, there is an exception for planes owned or leased by a member or a member's immediate family.

(8) Lobbyists are subject to more-stringent registration, reporting, and disclosure rules.

- **Registration and reporting requirements have been heightened.** On registration forms, lobbyists must now identify legislative or executive employment during the 20 years prior to their engagement by a client; the prior "look-back" period was two years. HLOGA also increases the frequency of lobbying income and expense disclosures through a quarterly filing requirement, and decreases the threshold income and expenses that must be disclosed. In addition, lobbyists must, for the first time, file contribution reports on a biannual basis disclosing campaign activities—including political contributions in excess of \$200 by the lobbyist or his employer—as well as donations to the following: entities controlled by or named for a member; events to honor a member; meetings or retreats held by members; and presidential library foundations or inaugural committees. In their contribution reports, lobbyists must also certify that they have read and not knowingly violated House and Senate gift and travel rules. The new law also mandates creation of a website database for lobbyist registrations and reports.

- **Involvement in coalitions must be disclosed.** A lobbyist must disclose in his quarterly reports to the House and Senate the identity of institutions that contribute more than \$5,000 per quarter and that “actively participate in the planning, supervision or control of . . . lobbying activities.” For example, suppose universities form a coalition on a particular issue and engage a lobbyist. If coalition members each contribute more than \$5,000 per quarter and actively participate in planning, their identities must be disclosed. Recent guidance from the Clerk of the House and the Secretary of the Senate (available at lobbyingdisclosure.house.gov) defines active participation to include selection of lobbyists, formulation of legislative priorities or strategy, substantive planning or a managerial role, but not mere dues payment, receipt of legislative reports, attendance at general coalition meetings or occasional responses to technical assistance requests. Disclosure is unnecessary if a coalition member is identified on the coalition’s publicly accessible website and does not control “in whole or major part” the coalition’s lobbying.

- **Bundling must be disclosed.** For the first time, political contributions that lobbyists collect from clients, employees of clients or other individuals must be disclosed. Federal candidate committees, political parties, and leadership political action committees (“PACs”) are required to report to the Federal Election Commission (“FEC”) the name, address, and employer of a lobbyist who supplies two or more “bundles” of contributions, which in the aggregate exceed \$15,000 during a covered period, typically six months. Under rules proposed by the FEC but not yet implemented, this requirement would apply if a lobbyist forwards a bundle or receives credit from the political action committee (e.g., special access to events) for donations from others. *See* 72 Fed. Reg. 62600 (2007). Commenters have urged the FEC to clarify whether the term “forward” includes electronic as well as physical delivery.

(9) New rules regulate practices such as earmarks and employment of lobbyists.

Certain amendments implicate institutions’ employment practices and Congressional earmarking:

- **Post-employment cooling-off periods have been increased.** When hiring a person who recently resigned from service as a member of Congress, high-level Congressional staffer or senior Executive Branch employee, an institution should be aware that such persons may not lobby the federal government for specified periods. Ex-senators and senior Executive Branch employees must wait two years. Ex-House members and high-level Congressional staff must wait one year. The cooling-off restrictions do not apply to former Executive Branch employees, members of Congress or Congressional staff who lobby in the course of their official duties as employees of “institutions of higher education” as defined in Section 101 of the Higher Education Act (i.e., accredited, degree-granting postsecondary education institutions), state or local government, hospitals or medical research organizations.

- **Members and high-level staff must disclose job negotiations.** For example, a House member must disclose, prior to election of a successor, to the House Committee on Standards of Official Conduct that he is in negotiations for future employment as a college president. A senator must disclose negotiations for future employment to the Senate Select Committee on Ethics, but she is forbidden, prior to election of a successor, to engage in negotiations for employment that involves lobbying. The term “negotiations” does not encompass exploratory conversations prior to a formal offer.

- **Lobbying by members’ relatives is restricted.** If an institution employs or retains a House member’s spouse as a lobbyist, the spouse cannot have official contact with the member’s staff. The amended Senate rule is broader. It covers “immediate family members” and applies to lobbying other senators and their staffs. However, a Senate “grandfather clause” covers a spouse who was a lobbyist at least one year before either the senator’s election or their marriage.

- **Partisan interference in private hiring decisions is prohibited.** HLOGA forbids members or staff to pressure any entity to hire a person or make any other employment decision on the basis of partisan political affiliation. However, letters of reference are permitted to vouch for an individual's credentials.
- **Congressional earmarking.** The reform measures impose new limits on use of earmarks to direct funds to pet projects of representatives and senators, including higher education institutions. For instance, a senator must disclose to the chair and ranking member of the committee with jurisdiction over the matter the intended recipient and purpose of any earmark, and must certify that the senator's immediate family will derive no pecuniary benefit. In the House, certification applies only to the member and his or her spouse. HLOGA also imposes restrictions on secret "holds" senators, without public attribution, have used to block legislation.

Appendix: Hypothetical Applications of New Congressional Lobbying Rules

Although application of the new House and Senate lobbying rules will require in a range of circumstances the exercise of judgment, and reliable conclusions are not invariably possible, the following hypotheticals illustrate apparent application of the new rules.

- (1) An administrator at a private university that retains a lobbyist takes a Congressional staffer to lunch. The administrator may not pay for the lunch and be reimbursed by the university. Nor may the administrator pay with personal funds with the intent to avoid the prohibition on gifts from entities that retain a lobbyist. The lunch is permissible if the staffer pays for his meal. However, an administrator at a university that does not have a lobbyist could pay for a lunch that costs less than \$50 if by doing so the institution will not exceed the annual \$99.99 gift maximum for the staffer. If the university is a 501(c)(3), the lunch must also be consistent with the university's charitable purpose.
- (2) An independent university that retains a lobbyist may not provide members of Congress or staff free tickets to its sporting events. By contrast, an independent college that does not have a lobbyist may provide a free ticket with a face value less than \$50 if by doing so the institution will not exceed the annual \$99.99 gift maximum for the member or staffer. If the ticket has no stated face value, it must be valued at the face amount of the most expensive ticket to the event. A state university may provide free tickets without regard to value.
- (3) A private college invites a member of Congress to participate in a panel discussion at an on-campus conference. If the event is open to the campus community without charge, neither Senate nor House gift rules prohibit the member to accept the invitation. In appropriate circumstances, the college may also pay for the member's reasonable travel and lodging under the Senate exception for 501(c)(3) organizations or the House's exception for higher education institutions. If the college employs or retains a lobbyist, however, it may not provide meals for the member unless a specific exception applies, such as the exception for widely-attended events, charitable fundraisers, small constituent-events or educational events (House only).
- (4) An independent U.S. university sponsors a five-day conference on global environmental issues in London and invites a Congressional staffer to participate. After the conference ends, the staffer wishes to vacation in Europe. The staffer will be permitted to accept reimbursement from the university for her expenses in London and the cost of round-trip airfare to and from London. She may then continue her travels at her own expense. If the extension of the trip increases the cost of the U.S.-London flights, however, the staffer must personally pay the difference.
- (5) A higher education association is planning a dinner gala that will be attended by more than 100 of its members. Under the widely-attended event exception, the association may invite a member of Congress to speak at the gala and waive her admission fee (including the costs of the dinner), regardless of whether the association retains or employs a lobbyist.
- (6) An independent university is hosting a fundraiser for an affiliated 501(c)(3) theater. Under the exception for charitable fundraisers, the university may pay the admissions costs for a member of Congress to attend this event.

- (7) A private college wants to award an honorary degree to a senator. The college may do so without running afoul of the gift restrictions. It may also provide travel, food, and entertainment in connection with the degree grant. Although there is no explicit blanket exception for attendance at commencement exercises for members of Congress, commencement exercises are “widely-attended” events and thus the rules described in the accompanying memo would presumably apply.
- (8) A faculty member works at a private university that employs a lobbyist. The faculty member wants to send copies of her recently-published book on education policy to members of the House and Senate Education committees. Under the exception for informational materials, the faculty member could send a single copy to each member’s office. He could provide additional copies for distribution to a particular audience, such as committee staff, but not for unrestricted use.
- (9) A House member introduces H.R. 123, a bill favorable to public universities. After passage of the bill, the president of a public university sends the member a gift with a note stating, “In appreciation for your good work on H.R. 123.” Even though the gift restrictions do not generally apply to public universities, the note connects the gift to specific legislative action and thus apparently constitutes an illegal gratuity.
- (10) A state university in a House member’s district may provide, without charge, its auditorium for the member’s town hall meeting. The member must pay fair market value for use of an independent university’s auditorium unless the university routinely makes the room available without charge to nonprofits or government agencies.
- (11) A non-profit foundation hosts a luncheon series on higher education policy. The foundation invites about 15 individuals to each luncheon, including some Congressional staff. Pursuant to the House-only exception for educational events, House staff may attend and may also accept lunch unless the series includes discussion of legislation. The Senate exception for free receptions and business meetings would likely permit Senate staff to attend, but they cannot accept the meal.

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