



ADMINISTRATIVE POLICY

Policy Title	Clearance Policy for Contacting Government Officials
Policy Subtitle/Subject	Click or tap here to enter text.
Responsible Executive(s) (RE)	Ian Morrison, VP, Public Affairs and Chief Communications Officer
Responsible Office(s) (RO)	Government & Community Relations
Primary Point of Contact from RO	Kerry Stockwell
Contact Information (email and phone)	kerry@tulane.edu (504-376-7824)
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Permanent

Temporary

1.0 POLICY STATEMENT

Tulane University requires all faculty, staff, and students to obtain clearance from the Office of Government and Community Relations before engaging in lobbying activities or contacting elected officials or their staff on behalf of the university. This policy ensures compliance with federal and state regulations governing lobbying activities by tax-exempt organizations.

2.0 PURPOSE AND SCOPE

This policy aims to maintain Tulane University's compliance with IRS regulations for tax-exempt organizations, the federal Lobbying Disclosure Act, and state lobbying and ethics laws. It provides a framework for university-approved appropriate engagement with elected officials while protecting the university's tax-exempt status and reputation. Nothing in this Policy limits the personal rights of faculty, staff, and students to engage with the public and policymakers at all levels of federal, state, and local government in their individual capacities as private citizens. When acting as private citizens, faculty,

staff, and students should use personal resources (e.g., personal letterhead, email, etc.) and take appropriate steps to clarify that they are not acting or speaking on behalf of Tulane.

3.0 APPLICABILITY OF THIS POLICY

This policy applies to all members of the Tulane University community, including faculty, staff, students, and any individuals acting on behalf of the university.

4.0 WEBSITE ADDRESS FOR THIS POLICY

Enterprise Risk Services will add the policy's web address after it is added to the policy library.

5.0 CONTACTS

Identifies the persons or departments to contact with any questions or concerns regarding the policy.

Subject	Contact	Telephone	E-mail/Web Address
All	Kerry Stockwell	(504) 376-7824	kerry@tulane.edu

6.0 CONTENT

1. Policy Statement
2. Purpose and Scope
3. Applicability
4. Website Address for this Policy
5. Contacts
6. Content
7. Definitions
8. Policy and Procedures
9. Consequences of Violating the Policy
10. Appendices

7.0 DEFINITIONS

- **Lobbying:** Any attempt to influence federal, state, or local legislation through communication with, or urging the public to communicate with, any member or employee of a legislative body or with any government official who participates in formulating legislation.
- **Elected Officials:** Any individual holding an elected office at the local, state, or federal level.
- **Lobbying Disclosure Act:** Federal law requiring the disclosure of lobbying activities aimed at the U.S. Congress and federal officials.

8.0 POLICY AND PROCEDURES

8.1 Activities Covered by This Policy

Any of the following activities conducted by a Tulane employee or contractor on Tulane's behalf are subject to this Policy.

- a. Direct or indirect communications with an official in the legislative or executive branch of the federal, state, or municipal government about:
 - b. the formulation, modification, or adoption of legislation (including legislative proposals, budgets, rules, regulations, executive orders, or any other program, policy, or position of the federal government);
 - c. the administration or execution of a government program or policy (including the negotiation, award, or administration of a federal, state, or municipal contract, grant, loan, permit, or license);
 - d. the nomination or confirmation of a person subject to confirmation by the United States Senate; or
 - e. any efforts in support of the foregoing activities, including preparation or planning activities, research, and other background work that is intended, at the time of its preparation, for use in contacts and coordination with the lobbying activities of others. Attempting to influence legislative or executive action, or both, through direct or indirect communications or activities with a state official (including, among others, legislators or legislative staff, prescribed members of the executive branch, members of state boards or board members) or their immediate family members. The provision of meals, tickets, travel, or other gifts of any value to the aforementioned federal, state, or local officials or their immediate family members.

8.2 Routinely Excepted Activities Not Covered by this Policy

A list of routinely accepted activities common to colleges and universities is provided below.

- Non-partisan legislative analysis, study, or research which (i) is purely educational in nature, (ii) is available to the public, governmental bodies, officials, and employees, and (iii) does not advocate (expressly or implicitly) the adoption or rejection of specific legislation.
- Communications, such as testimony before a legislative committee, board, council, or other public body, which are in response to an official (preferably written) request for technical advice or assistance.
- Communications with federal officials made in response to a notice in the Federal Register, Commerce Business Daily, or other similar publications soliciting communications from the public and directed to the federal agency officials specifically designated in the notice to receive such communications; or
- Communications with federal agency officials who are not "covered executive branch officials," including routine inquiries or exchanges with program officers or other "non-covered" officials regarding grants programs, the administration of current grant awards, or proposed or possible changes in an agency's research programs.

8.3 Clearance Requirement

All faculty, staff, and students must obtain prior written approval from the Office of Government and Community Relations before:

- a) Engaging in any lobbying activities on behalf of Tulane University.
- b) Contacting elected officials or their staff regarding university matters.
- c) Testifying before legislative committees or participating in government hearings as a Tulane representative.

8.4 Clearance Process

- a) Submit a written request to the Office of Government and Community Relations at least five business days before the proposed contact or activity.
- b) Provide details of the proposed interaction, including the official(s) to be contacted, the purpose of the contact, and any materials to be shared.
- c) Wait for written approval before proceeding with the contact or activity.

8.5 Reporting Requirements

- a) All approved lobbying activities must be documented and reported to the Office of Government and Community Relations within 48 hours of the interaction.
- b) Include details such as date, time, officials contacted, topics discussed, financial expenditures, and any follow-up actions.

8.6 Personal Lobbying Policy

- a) Tulane University recognizes the individual engagement of members of its community as private citizens in the legislative public policy process. When faculty, staff, students, and other affiliates of Tulane engage in communications about legislative matters, it is important to distinguish between the private opinions of individual members of the Tulane community and Tulane's official position. In general, when faculty, staff, students, and other affiliates participate in personal lobbying activities by expressing their private opinions, they must take specific steps to ensure that their activities are in no way perceived by the public as being endorsed by the university or representative of the university's position on the matter.
- b) University resources, including letterhead, email accounts, social media accounts, and facilities, may not be used for personal lobbying activities.
- c) When engaging in personal lobbying activities, individuals must clearly state that they are not representing Tulane University. When institutional affiliation is included in such communications, it must be clearly stated that such affiliation is listed for identification purposes only and does not represent the views or endorsement of Tulane University.
- d) Faculty and staff should use off-hours or PTO to participate in lobbying activities.

8.7 Gifts and Hospitality

- a) No gifts or hospitality may be offered to elected officials or government employees without prior approval from the Office of Government and Community Relations.
- b) All gifts and hospitality must comply with state ethics laws and university policies.

9.0 CONSEQUENCE OF VIOLATING THE POLICY

Violation of this policy may result in disciplinary action, up to and including termination of employment or student status. Additionally, unauthorized lobbying activities may jeopardize the university's tax-exempt status and result in financial penalties.

APPENDIX I

Relevant Information

[Tulane University Political Activities Policy](#)

Louisiana Lobbying Statute ([RS 24:50](#))

APPENDIX II

Other Relevant Information

- Tulane University Faculty Handbook
- Tulane University Staff Handbook
- Tulane University Student Code of Conduct