



TO: Vice Presidents, Deans, and Directors

FROM: Stacy Rastauskas, Associate Vice President
Christopher M. Culley, Senior Vice President & General Counsel

DATE: July 3, 2012

RE: Federal Lobbying Disclosure Act

Introduction

The Federal Lobbying Disclosure Act requires the University to report, on a quarterly basis, a good faith estimate of all expenditures on federal "lobbying activities" conducted on behalf of the University. As administrators, you may have engaged in what the Act defines as federal "lobbying activities" on behalf of the University, and if you have, we are writing to request your assistance in providing information we will require for the submission of our next report **covering the period from April 1, 2012 through June 30, 2012.**

What Constitutes Lobbying Activity?

For purposes of the Act, "lobbying activities" includes both "lobbying contacts" and "efforts in support of such contacts," including "preparation and planning activities, research and other background work that is intended, at the time it is performed, for use in contacts, and coordination with the lobbying activities of others." The statutory definition of "lobbying contacts" essentially means traditional, direct contact with certain high-level federal officials for the purpose of influencing federal law, regulations, policies, grants, contracts and the like - not public testimony, participation in advisory committees, public position statements on policy issues, or other public communications. A more detailed explanation of the statutory definition of "lobbying contacts" is attached.

Note that the definition includes only those contacts that both are with the specific federal officials listed in the statute and pertain to the federal issues specified in the statute. Contacts that (a) are with other federal officials, (b) do not pertain to the specified federal issues, and/or (c) are with state or local officials should not be included in your estimate.

Note also that "lobbying contacts" includes only those contacts that are made on behalf of the University. It does not include lobbying that you may have performed on behalf of your personal or scholarly interests or of any professional organizations. It includes only those contacts that (1) you make at the specific request or authorization of the President, the Provost, the Senior Vice President for Government Affairs, the Associate Vice President for Government Affairs, or other appropriate University official or (2) contacts that are otherwise clearly within the normal scope of your administrative duties. Only those activities should be included in your estimate. Individual faculty members and staff are not, as such, authorized to lobby on behalf of the University, and any efforts in that regard are considered personal in nature in the absence of specific, individual, prior authorization.

What to do if you any of your activities qualify

If you have been engaged in any of the types of activities described above, your time and expenses must be reported as part of the University's lobbying disclosure.

Additionally, if you spend more than 20% of your time (more than eight hours per week) on lobbying and have one or more contacts during the three month period, you will need to be listed on the University's disclosure form. Please contact Stacy Rastauskas immediately at 202.624.3520 to be added as a lobbyist so that the proper information can be obtained.

If you spent less than 20% of your time, but did engage in lobbying or lobbying activities, your time and expenses must still be reported. Please complete the attached form to estimate the approximate percentage of your University time that you devoted to such activities from **April 1, 2012 through June 30, 2012**; multiply that percentage by your salary for that period, and report the resulting figure. Also report any additional expenses incurred in connection with federal "lobbying activities," such as plane fares to Washington, D.C., or other travel expenses paid with University funds. Contact Stacy Rastauskas if you have any questions.

Please return the attached form for your report to Joey Clark by email (clark.1168@osu.edu) **no later than Friday, July 13, 2012.**

Thank you in advance for helping us to collect the information required for this federally mandated report.

cc: Richard Stoddard, Vice President for Government Affairs

Enclosures

Lobbying Disclosure Act
Report for [Applicable Date Range]

[Due Date]

1. Name:
2. Department or College:
3. Approximate % of time spent on federal "lobbying activities" (including "lobbying contacts" and "efforts in support of such contacts") during the specified period: (list as a percentage)
4. Amount of your salary during the specified period: (if reporting any amount during specified period)
5. Line 3 x Line 4:
6. Expenses incurred in connection with federal "lobbying activities" during the specified period, including travel expenses:
7. Total expenditures in connection with federal "lobbying activities" during the specified period: (Line 5 + Line 6)
8. Legislation connected with lobbying activity:
(Must include Bill Number, Title, and sections and/or accounts and organization contacted--the Senate, House of Representatives or federal agency)
9. Are you aware of any person(s) within your department that engage in lobbying activities?: (Please list names)

Signature

Date

Please Return to Joey Clark – Staff Assistant, Federal Relations
Email: clark.1168@osu.edu Fax: 202-624-3519