



Lobbying Disclosure and Political Activity

Policy: GOV042
Responsible Executive: Vice President of Federal Strategy, Vice President of State & Local Affairs
Responsible Office: Office of Federal Strategy, Office of State & Local Affairs
Approved by: Senior Planning Group
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Policy Statement and Purpose

As a tax-exempt organization under section 501(c)(3) of the Internal Revenue Code, The Johns Hopkins University (“JHU” or “University”) cannot intervene in any political campaign on behalf of, or in opposition to, any candidate for public office. In addition, contacts with federal officials that could reasonably constitute lobbying on behalf of the University should be disclosed to the offices of Federal Strategy and contacts with state and local officials should be disclosed to the Office of Government, Community and Economic Partnerships to ensure institutional compliance with applicable federal, state, and local laws.

The University encourages all University affiliates to be informed and engaged citizens in our democratic process. In view of JHU’s compliance obligations, the Lobbying Disclosure and Political Activity Policy (“Policy”) sets forth parameters for JHU faculty, staff, and students with regard to lobbying and campaign activity.

Who Is Governed By This Policy

All units of the University, excluding the Johns Hopkins University Applied Physics Laboratory.

Definitions

Lobbying	Under federal law, lobbying is defined as oral or written communications to a public official regarding the formulation, modification, or adoption of legislation, a federal rule, regulation, executive order, or any other program, policy, or position of the U.S. Government. There are exceptions to the definition of a lobbying contact for specific communications like testimony before a congressional committee, participation in the federal regulatory process, and routine responses to questions from federal government officials. Maryland and other state and local jurisdictions have their own definitions of lobbying; the Office of Government, Community and Economic Partnerships can provide specific guidance on any differences.
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Gifts and Honoraria	Any thing of monetary value (even de minimis), such as gratuities, favors, discounts, entertainment, meals, hospitality, loans, forbearances, services, training, travel expenses, in-kind contributions, advanced payments, and reimbursements after the fact, given to any government employee in their professional capacity.
Non-partisan Electoral Activity	Activities that do not promote or oppose a candidate for public office but instead support civic engagement. Examples include organizing voter registration drives, conducting voter education programs, hosting candidate debates, and inviting public officials or political candidates to visit campus in their official capacity and duties, so long as such a visit does not involve a campaign for partisan political office.
Political Campaign	Activity for or against a political party, candidate for partisan political office, or partisan political group. Examples include placing signage endorsing or opposing a candidate for public office; soliciting donations to a political campaign; conducting political rallies; hosting in-person or virtual press conferences for a political candidate; and advertising or participating in political campaign events.
Public Official	Any elected or appointed officer, employee, or agent of federal, state, regional, or local government (or political subdivision thereof) who exercises a legislative, executive, or judicial decisional or policymaking function.
University Resources	Generally refers to the University seal, letterhead, symbols, logos, or other identifiable marks of institutional affiliation (including those of any of the University's schools, departments, centers, or institutes); University email accounts, University-based websites, and University social media; University publications; University physical facilities; University office supplies; University-supplied phones, desktops, laptops, and other electronic devices (including subscriptions to web-based services, such as Zoom or Teams); University administrative support; University salary and benefits; and University personnel.

Policy

I. Lobbying Disclosure

The University is required to file quarterly reports that include a “good faith” estimate of expenses incurred for federal lobbying activities “on behalf” of the institution. We interpret this disclosure requirement to apply to contacts that could reasonably constitute lobbying by those in senior positions who can be expected to speak for the University. We do not attempt to capture faculty interactions with policy makers in their areas of professional expertise, but contacts that could reasonably constitute lobbying on behalf of the institution made by faculty in conjunction with, or at the direction of, these senior University officials must also be disclosed.

A “lobbying contact” will include contacts that could reasonable constitute lobbying made “on behalf of the University” by senior University officers, such as the President, Provost, Deans, Vice Presidents, and Government Relations officers or their designees. Independent contacts to or by faculty related to their areas of expertise are not considered lobbying on behalf of the University.

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JHU is mindful that translating knowledge into policy change is an important part of its mission, and the University's contribution to evidence-based policy deliberation is vital. Faculty and staff are encouraged to contact the offices of Federal Strategy or Government, Community and Economic Partnerships if they have questions about the need for disclosure, as state and local laws may differ.

Per the JHU Use of Name Policy, affiliates shall include a disclaimer as necessary to state that the views expressed by the affiliate do not necessarily reflect the views of the University and that the affiliate's opinions are their own.

A. Retained Lobbyists

JHU affiliates (faculty and staff, divisions, departments, and centers and institutes) may not retain external lobbyists, lobbying firms, or staff who will engage in Lobbying without prior approval of their Dean, Office of the General Counsel, and the Vice President of Federal Strategy or the Vice President of Government, Community and Economic Partnerships. Review by these officials will be limited to legal compliance and conflict of interest issues. In general, such lobbyists will be retained through the offices of Federal Strategy or Government, Community and Economic Partnerships.

B. Lobbying Restrictions

The University, and its faculty and staff, are prohibited by law from using federal or state grant funds to lobby any Public Official. Ordinary communications are permitted, including general background information, the timing of funding decisions, and updates on the progress or status of funded academic work.

C. Gifts and Honoraria

As a general matter, the University, and its faculty and staff are prohibited by law from giving a gift, or from using any University Resources to give a gift, to any Public Official or to a Public Official's staff member on behalf of the University. In certain limited instances, however, gifts to Public Officials in compliance with applicable University policies and applicable laws and regulations (see Section III below) may be appropriate.

D. Appropriations/Congressionally Directed Spending/State Budget Requests

JHU faculty and staff may not request congressional appropriations, federal community project funding or congressionally directed spending (also known as earmarks), or state budget proposals on behalf of the University absent review and approval by the offices of Federal Strategy or Government, Community, and Economic Partnerships, respectively. This prohibition pertains to budget and appropriations only, not to ordinary communications regarding research awards including background information, the timing of funding decisions, updates on the progress or status of academic work, and funding applications.

II. Political Campaign Activity

Section 501(c)(3) of the Internal Revenue Code prohibits tax-exempt organizations like JHU from participating or intervening in political campaigns on behalf of or in opposition to any candidate for public office. However, JHU does encourage its affiliates to engage in civic activity in their individual capacities in matters unrelated to their employment at JHU. As a general rule, employees may engage in campaign and electoral activity

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solely “on their own time and own dime,” meaning in an individual capacity using personal resources, while off campus and on personal time.

A. Prohibitions and Restrictions on University Involvement in Political Campaign Activity

The University, including any faculty or staff in their University capacity, is prohibited from the following:

- (i) endorsing or opposing any candidate for public office, political party, or political action committee;
- (ii) donating or contributing to any political candidate, campaign, party, or action committee;
- (iii) participating or engaging in political fundraising events;
- (iv) publishing, displaying, or distributing statements for or against any political candidate, campaign, party, or action committee;
- (v) indicating in University publications that the University will send any members to work for any particular political candidates, campaigns, parties, or action committees; and
- (vi) engaging in any other activity that favors or opposes any political candidate, campaign, party, or action committee.

The University may, in its discretion, lease its facilities to campaigns and groups that conduct political campaign activities on the same basis, and subject to the same fees, to similar groups of any political party and to non-political groups. Campaigns who lease University facilities for an event will be prohibited from conducting a campaign rally, press conference, or fundraising during the event, and the format of any event must make clear that the University does not endorse or oppose any candidate for public office.

The University may conduct Non-Partisan Electoral Activity, including candidate forums or debates on campus, provided all candidates for the office in question are invited to participate in the event. Unless authorized by Federal Strategy or Government, Community and Economic Partnerships, University departments, divisions, centers and institutes, offices, student groups, and faculty or staff members may not invite a political candidate or campaign to conduct a campaign event on campus and/or which utilizes University resources.

B. Individual University Affiliate Involvement in Political Campaign Activity*Employees:*

JHU employees may engage in Political Campaign Activity solely in their personal capacities, on their own time, and using their personal resources. When engaging in Political Campaign Activity, JHU employees may be identified by their University titles or roles only if they make it clear that their association with the University is provided for identification purposes and does not indicate an endorsement of (or opposition to) the candidate by the University.

JHU employees who engage in individual Political Campaign Activity are prohibited from utilizing any University Resources to do so, including, but not limited to:

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- (i) Using University funds to reimburse individuals for political donations;
- (ii) Soliciting University employees while on University time and using University resources to make political contributions or support or oppose political candidates, campaigns, parties, or action committees; and
- (iii) Providing hyperlinks on University websites or social media to any material favoring one political candidate, campaign, party, or action committee over another.

JHU employees who teach courses that address political campaign issues may provide hyperlinks in course-specific University websites or in other course-specific materials to political campaign websites or social media as long as the hyperlink is accompanied by a clear and unambiguous statement that the hyperlink is being provided solely by the employee for an academic or educational purpose and does not reflect University views.

Students:

Subject to University policies on permission and scheduling, established JHU student organizations may use University facilities for Political Campaign Activity purposes, subject to the standard rules for use of the facility and the normal charge, if any. Student organizations may not solicit funds in the name of the University to be used in off-campus intervention or participation.

Student publications may run editorials expressing the editors' views on political candidates, campaigns, parties, or action committees provided that the publication's editorial policy is free of editorial control by University administrators or faculty advisors. A statement on the editorial page must indicate that the views expressed are those of the student editors and not those of the University.

III. Visits to Campus by Elected and Appointed Officials

Any JHU affiliate wishing to invite an elected or appointed Public Official (or their staff) to campus in their official capacity is encouraged to contact the office of Federal Strategy and/or Government, Community and Economic Partnerships to advise and assist with logistics, clarify any rules, prohibitions, or restrictions, and help shepherd the request through the appropriate channels. This also includes any faculty or staff, divisions, offices, or centers and institutes who wish to honor or recognize a Public Official. Rules and regulations governing visits to campus by federal, state, and local elected and appointed officials differ; the offices of Federal Strategy and/or Government, Community and Economic Partnerships can provide fact-specific advice to a JHU affiliate.

Procedures

Contact the offices of Federal Strategy (fedaffairs@jhu.edu) and Government, Community and Economic Partnerships (gca@jhu.edu) for any questions, concerns, or to disclose lobbying activity.

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Policy Enforcement

Enforcement	The Office of Johns Hopkins Internal Audit will investigate suspected violations of this Policy and may recommend disciplinary action in accordance with University codes of conduct, policies, or applicable laws. Sanctions may include disciplinary action up to and including termination of employment; student discipline in accordance with applicable University policy; and/or civil or criminal penalties.
Reporting Violations	Suspected violations may be reported to the Office of Johns Hopkins Internal Audit, the Office of General Counsel, or via the Ethics, Fraud and Compliance Hotline.

Related Resources

University Policies and Documents
Academic Freedom at Johns Hopkins
Disclose Federal Advocacy
Use of Name
University Forms and Systems
https://federalstrategy.jh.edu/advocacy-form/

Contacts

Subject Matter	Office Name	Telephone Number	E-mail/Web Address
Clarification and Interpretation for Federal Issues	Office of Federal Strategy	443-997-5999	https://federalstrategy.jhu.edu/
Clarification and Interpretation for State & Local Issues	Office of Government, Community and Economic Partnerships	443-997-5999	https://gca.jhu.edu/
Compliance Violations	Ethics, Fraud & Compliance Hotline	844-773-2528	http://johnshopkins.speak2us.com/