



Lobbying & Political Activity: Frequently Asked Questions

The Johns Hopkins University (JHU) recognizes that translating research and knowledge into action is an important part of its mission and thus seeks to support faculty and others who are working to contribute to the development of evidence-based policy. As an institution of higher education and a not-for-profit entity, JHU must comply with federal law related to ethics, lobbying disclosure, and political activity. This document contains general guidance for engagement with federal officials and staff in Congress and the executive branch. Please contact Federal_Strategy@jh.edu with questions.

Disclosure Compliance

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 policymakers 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.

Independent contacts to or by faculty related to their areas of expertise are not considered lobbying on behalf of the university.

Resources

Web-based lobbying disclosure portal available [here](#). University Lobbying Disclosure and Political Activity Policy available [here](#).

Permitted	Not Permitted
Lobbying as a subject matter expert with a disclaimer that the views expressed do not necessarily reflect the views of the Johns Hopkins University.	Lobbying in excess of 20% time (or the equivalent of more than one day per week).
Campaign and electoral activity on your "own time, with your own dime" (e.g., personal capacity, on personal time, with personal resources).	Campaign and electoral activity using JHU resources (including email address and computer) during generally accepted work hours or while on campus.
Accepting an invitation to testify as a subject matter expert before a U.S. congressional committee, provided the disclaimer is offered in written and oral statements.	Retaining a contract lobbyist or hiring staff for whom greater than 20% of their time is spent lobbying without leadership approval, oversight, and coordination with Federal Strategy.

JHU Affiliate Guidelines

Do use a disclaimer in public statements.

For example, *“The views expressed are my own and do not necessarily reflect the views or positions of the Johns Hopkins University or the Johns Hopkins Health System.”*

Do contact the Office of Federal Strategy if you have been invited to testify.

Federal Strategy staff can support you by providing practical guidance, demystifying the hearing process, and anticipating potential controversies or questions to ensure you are well prepared.

Do partner with the Office of Federal Strategy to invite public officials to campus.

Federal Strategy staff can assist with strategic engagement, timing and logistics, and shepherding the request through appropriate channels.

Do not exceed 20% time engaged in lobbying.

As a rule of thumb, Johns Hopkins affiliates should not exceed more than one day per week lobbying federal elected or appointed officials.

Do not retain external lobbyists or hire employees whose primary responsibility is lobbying.

Centers, institutes, departments, and individual faculty may not enter into a lobbying contract without prior approval of their dean, Office of General Counsel, and the vice president for federal strategy. The same applies to the hiring of staff who will be responsible for lobbying.

Do not offer gifts to public officials.

As a general rule, affiliates should refrain from offering meals, tickets, travel expenses, and other gifts of any value to public officials; General Counsel and Federal Strategy can provide further guidance.

Do not use university resources for political campaign activities.

Political campaign activity is permitted in one’s personal time with personal resources while the university is prohibited from endorsing or opposing any candidate for public office. University resources that cannot be used for political activities include letterhead, JHU email accounts, physical facilities, computers, phones, JHU Zoom or Teams accounts, and the use of staff.

For more information, contact the Office of Federal Strategy at Federal_Strategy@jh.edu. Faculty and staff should contact the office of Government, Community and Economic Partnerships at gce@jh.edu if they have questions about the need for disclosure of state and local lobbying as those laws differ.

What is “lobbying”?

Under the federal Lobbying Disclosure Act (LDA), any oral, written, or electronic communication with a covered official that is made on behalf of an institution is a “lobbying contact” if it involves the formulation, modification, or adoption of federal legislation.

Who is a “covered official”?

Legislative Branch: Virtually every person working for Congress—from the receptionist to the chief of staff—is a covered official for the purposes of the LDA.

Executive Branch: Only the most senior executive branch employees are “covered officials.” Still, the list encompasses a range of positions across many agencies.

Who should disclose lobbying contacts?

University officials, e.g., the president, deans, vice presidents, and government relations professionals or their designees.