

IEEE Lobbying Compliance Guidelines

(Version: 12.09)

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1. Introduction

The Institute of Electrical and Electronics Engineers, Incorporated (IEEE), engages in a variety of “lobbying activities” consistent with its Section 501(c)(3) not-for-profit status. Lobbying activity occurs primarily, but not exclusively, within the IEEE-USA organizational unit, which is charged in the IEEE Bylaws (I-303(8)) with “coordinating and reporting, under federal disclosure laws, all official communications with government.” Lobbying activities may occur in other staff departments or organizational units in a variety of contexts, such as seeking a legislative resolution honoring an IEEE Anniversary event, soliciting federal grants, or pursuing federal contracts.

Contrary to popular misconception, Section 501(c)(3) organizations like IEEE may engage in “lobbying” (as defined under the Internal Revenue Code and described below) as long as the lobbying activity and associated expenditures are consistent with the organization’s purposes, and the associated effort and expenditures are an “insubstantial” portion of the organization’s overall program. Section 501(c)(3) organizations may not, however, engage in any political activity (i.e. directly or indirectly participating in, or intervening in, any political campaign on behalf of--or in opposition to--any candidate for elective public office).

As an organization, IEEE has put itself into a legal “safe-harbor” and elected to be governed by Section 501(h) of the Internal Revenue Code, which measures lobbying based on an organization’s expenditures, and provides an exact dollar based lobbying limit based on the size of the organization’s operating budget. Therefore, if an activity creates no cost for the organization then it does not count against its lobbying limit, e.g., volunteer time involved in lobbying. Using the formula, IEEE (including all of its organizational units) can expend a cumulative total of \$1 million a year on lobbying activities, of which only 25% can be allocated to grassroots advocacy communications directed at the general public. Section 501(h)-electing organizations that exceed the requisite monetary limits are required to pay a tax on the excess

expenditure, and do not risk their tax exempt status unless the lobbying expenditures are more than 150 percent of its lobbying limit over a three year period

In addition to annual tax filings required by the Internal Revenue Code, various federal laws such as The Lobbying Disclosure Act (LDA) of 1995, as amended by the Honest Leadership and Open Government Act of 2007, regulate lobbying by both for-profit and not-for-profit corporations and require regular reporting of lobbying contacts and expenditures.

In order to ensure IEEE compliance with federal laws and associated regulations, reporting responsibilities within IEEE are currently assigned as follows:

- IEEE's Development Office staff discloses to appropriate federal authorities any qualifying lobbying contacts made during the initial proposal submission or while soliciting for that U.S. federal government grants or cooperative agreements.
- IEEE's Controllers Office staff discloses to the appropriate federal authorities qualifying lobbying contacts made for a specific grant during the life of that grant.
- IEEE's Customer Operations staff discloses any lobbying contacts made on behalf of IEEE with respect to a federal contract, by filing the OMB Standard Form SF-LLL, Disclosure of Lobbying Activities (www.whitehouse.gov/omb/grants/sflllin.pdf), to provide the name of the registrants.
- IEEE-USA files quarterly reports with the United States Congress reporting IEEE's U.S. "lobbying" expenditures, provides information on these lobbying-related expenditures to the IEEE's Office of Tax Compliance, and assists IEEE entities in the U.S. to comply with any applicable state "lobbying" laws and reporting requirements.
- IEEE's Office of Tax Compliance reports the total IEEE lobbying-related expenditures in Schedule A of the annual IRS Form 990 tax filing.
- The IEEE's Office of International Corporate Regulatory Compliance also oversees these processes to ensure that IEEE is abiding by all applicable national laws and regulations.

Key contacts for each of these entities/offices is provided in Appendix A.

In order to perform these functions effectively and ensure compliance with federal and state law, each of these IEEE entities must receive timely and accurate information on lobbying activities conducted by IEEE's employees, contractors and/or volunteers. This guideline document provides basic information, definitions, key contacts, and processes to assist you in accurately reporting lobbying activities to ensure IEEE legal compliance under United States law.

In addition to meeting U.S. legal requirements (federal, state and local), IEEE is also subject to specific laws or regulations governing "lobbying" activities in other countries in which IEEE operates. IEEE staff, volunteers and/or organizational units engaged in such activities outside the U.S. should contact their Senior Management Representative, who will take appropriate action to assess and ensure IEEE compliance with applicable national law.

2. Lobbying Generally

Organizations such as IEEE that engage in lobbying activities in the United States must register with the U.S. Congress under the Lobbying Disclosure Act of 1995, which has been recently amended by the Honest Leadership and Open Government Act of 2007, identify any employees by name whose activities meet the definition of a “lobbyist”, identify who was contacted and on what subject matter, and make a “good faith estimate” of IEEE’s total lobbying expenditures on a quarterly basis rounded to the nearest \$10,000. IEEE must also annually report its total lobbying expenditures to the Internal Revenue Service in its Form 990 (Schedule A) filing.

In order to ensure IEEE’s compliance with U.S. lobbying disclosure laws, IEEE staff or volunteers who seek engage in lobbying activities in the United States on behalf of IEEE or any of its operating units should:

- Ensure that the position or recommendations being communicated in a lobbying context is authorized by the originating entity through its appropriate approval process. Consult IEEE Policy 15, which governs the development and approval of IEEE position statements and organizational unit position statements.
- Coordinate the lobbying contact with IEEE-USA, pursuant to IEEE Bylaw I-308(8), which provides that “IEEE-USA shall be the organizational unit that represents the professional interests of the IEEE before U.S. governmental bodies. It shall also be responsible for coordinating and reporting, under federal disclosure laws, all official communications with government.” IEEE-USA’s government relations staff can also provide advice and assistance on effective lobbying communications methods and strategies.
- Keep accurate records of any reimbursed time and expense incurred in planning for or engaging in a lobbying contact and report that contact and expenses using the U.S. Lobbying Activity Report (Appendix B).
- If the proposed lobbying contact relates to a federal grant, contract or cooperative agreement, consult Section 3 below for additional guidelines.

What is a Lobbying Contact?

Tax exempt organizations, such as IEEE, may elect to use the Internal Revenue Code’s (IRC) definition of lobbying for certain congressional lobbying disclosure reporting purposes (specifically, in determining the threshold for registration and in making the good faith estimate of total expenses incurred in connection with lobbying activities during a quarterly period). IRC 4911(d) defines lobbying as any attempt at “influencing legislation,” including:

- (A) any attempt to influence any legislation through an attempt to affect the opinions of the general public or any segment thereof, and
- (B) any attempt to influence any legislation through communication with any member or employee of a legislative body, or with any government official or employee who may participate in the formulation of the legislation.

Under the Internal Revenue Code, a lobbying contact may occur in any number of contexts, including a formal or informal meeting, a telephone conversation, a letter, an email, a press release, a newspaper advertisement or other means of communication which are directed at a legislator (or legislative staffer) or covered executive branch official. The key is not how you communicate, but what you are communicating and whom you are communicating with.

The following activities are specifically exempted from the definition of lobbying under the Internal Revenue Code:

- (A) making available the results of nonpartisan analysis, study, or research;
- (B) providing of technical advice or assistance (where such advice would otherwise constitute the influencing of legislation) to a governmental body or to a committee or other subdivision thereof in response to a written request by such body or subdivision, as the case may be;
- (C) appearances before, or communications to, any legislative body with respect to a possible decision of such body which might affect the existence of the organization, its powers and duties, tax-exempt status, or the deduction of contributions to the organization;
- (D) communications between the organization and its bona fide members with respect to legislation or proposed legislation of direct interest to the organization and such members, other than communications that contain a “Call to Action” (i.e. a statement encouraging or requesting a bona fide member to engage in a contact whose purpose is to influence legislation and which does not fall within the specified exemptions); and
- (E) any communication with a governmental official or employee, other than -
 - (i) a communication with a member or employee of a legislative body (where such communication would otherwise constitute the influencing of legislation), or
 - (ii) a communication the principal purpose of which is to influence legislation.

IRC 4911(e)(2) defines the term “legislation” to include action with respect to Acts, bills, resolutions, or similar items by the Congress, any State legislature, any local council, or similar governing body, or by the public in a referendum, initiative, constitutional amendment, or similar procedure.

Lobbying is also divided into two categories-commonly referred to as “grassroots lobbying” (IRC 4911(d)(1)(A)) and “direct lobbying” (IRC 4911(d)(1)(B)), for purposes of tracking associated spending limits. Grass roots lobbying is defined as an attempt to influence any legislation through an effort to affect the opinions of the general public or any segment thereof. Direct lobbying is defined as any attempt to influence any legislation through communication with any member or employee of a legislative body or with any government official or employee who may participate in the formulation of legislation. Advocacy-related communications with an organization’s bona-fide members are classified as direct lobbying. The distinction between grass roots lobbying and direct lobbying becomes important when classifying expenditures for reporting purposes, since not-for-profits are allowed to expend only up to 25% of their total lobbying expenditures on grassroots lobbying.

Tax exempt organizations, such as IEEE, electing to apply IRC definitions for determining the threshold for registration and making the good faith estimate of total expenses incurred in connection with lobbying activities may also substitute the IRC definition of lobbying for other Lobbying Disclosure Act reporting purposes. Specifically, the IRC definition must be used for federal executive branch lobbying, and the Lobbying Disclosure Act definition must be used for legislative branch lobbying.

In the Lobbying Disclosure Act, lobbying is defined as an oral, written or electronic communication to a Covered Legislative Branch Official or Covered Executive Branch Official in an attempt to influence:

1. the formulation, modification, or adoption of federal legislation;
2. the administration or execution of a federal program or policy;
3. formulation, modification, or adoption of a federal rule, regulation, executive order, policy or position of the United States Government;
4. the nomination or confirmation of a person subject to confirmation by the Senate.

A “Covered Legislative Branch Official” includes: Members of Congress; an elected officer of either House of Congress; employees of a Member of Congress, Committee of either House of Congress, leadership staff of either House of Congress, joint committee of Congress, working group or caucus, and any other legislative branch employee serving in a position described under section 109(13) of the Ethics in Government Act of 1978.

A “Covered Executive Branch Official” includes: the President; the Vice President; any officer or employee in the Executive Office of the President; any Executive Schedule level I – V officer or employee; any member of the armed services at or above pay grade O-7; and any “Schedule C” political appointees.

Consistent with the IRC rules, a number of activities are specifically excluded from the definition of “lobbying contact,” under the Lobbying Disclosure Act, including:

1. a speech, article, publication or other material that is distributed and made available to the public through a medium of mass communication;
2. a request for a meeting, a request for the status of an action, or other similar administrative request;
3. testimony given before Congress or submitted for inclusion the public record;
4. information provided in writing in response to an oral or written request, or in response to a request for public comments in the Federal Register;
5. required by subpoena or civil investigative demand;
6. written comment filed in the course of a public proceeding;
7. made by the media if the purpose is gathering and disseminating news and information to the public.

What Costs Must Be Reported

- Salary/benefits/overhead (staff only)
- Travel and other direct expenses (staff or volunteer)
- Payment to outside lobbying firms or vendors
- Appropriate percentage of dues paid to organizations that lobby on IEEE's behalf

In determining lobbying costs, it is important to note that lobbying activities encompass both the actual lobbying contact AND efforts in support of such contacts including planning and preparation, research and other background work that is intended, at the time it is performed, to support the lobbying activity.

As a reminder, under the Section 501(h) election, volunteer time is not factored into the determination of lobbying costs, but any reimbursed expenses relating to volunteer lobbying on behalf of IEEE must be reported.

Routine activities, such as reading general circulation publications, viewing mass media communications, monitoring introduction of new legislation or regulations and preparing brief summaries for the information of others, are not considered to be part of planning and preparation for a specific lobbying activity (even if they may assist that activity) and, therefore, the associated expenses of those routine activities may be excluded.

If expenses are incurred (e.g. for travel or meetings) that have both a lobbying and non-lobbying purpose, then the costs should be allocated on a pro-rata basis. For example, if half of a meeting is devoted to planning and preparation for a lobbying activity, half of the participating staffs' time and half of any associated staff or volunteer travel and meeting expenses should be reported as lobbying-related expenses.

A separate determination of overhead costs (including employee benefits) attributable to support of lobbying activities is not required. Instead, IEEE calculates the overhead component of its aggregated lobbying-related expenditures using an IRS-allowed "alternative gross-up method", under which the taxpayer multiplies its basic labor costs for lobbying labor hours and other direct expenses by 225 percent and then adds any allocable third party costs. Basic labor costs are limited to wages or other similar costs, such as guaranteed payments for services. Pension costs and other employee benefits are not included in basic labor costs.

Because IEEE uses the Alternative Gross-up method to calculate overhead-related lobbying expenditures, staff also do not need to report staff hours related to providing secretarial, clerical, or administrative support to lobbying activities. These hours are subsumed within the overhead assumption. Only staff hours that involve exercise of significant judgment with respect to the lobbying activity should be reported.

3. Lobbying Related to Grants, Contracts and Cooperative Agreements

U.S. law provides generally that no money appropriated by an enactment of Congress may be used by the recipient directly or indirectly to influence (i.e. “lobby”) in any manner a Member of Congress. This law was extended by the so-called “Byrd Amendment” in 1989 to prohibit recipients of federal funds--whether grants, contracts, or cooperative agreements--from using those funds to lobby to obtain, extend, or modify a federal award.

For each federal grant, contract or cooperative agreement with a value of \$100,000 or more received by IEEE or one of its organizational units, or commitment providing for the USU.S. to insure or guarantee a loan exceeding \$150,000, IEEE is required by law to certify to the government granting agency that:

1. No federal appropriated funds have been paid or will be paid, by or on behalf of the IEEE, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement;
2. If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this federal contract, grant, loan or cooperative agreement, IEEE is required to complete and submit a separate federal Disclosure of Lobbying Activities form (see Appendix B).

Certifications must be included in the award documents for all sub-awards at all tiers (including sub-grants, contracts, under grants and cooperative agreements, and subcontracts). All sub-recipients are also required to certify and disclose accordingly.

Disclosure forms must be filed prior to the award, and thereafter at the end of each calendar quarter in which there occurs any event that requires disclosure or affects the accuracy of the information contained in any previously filed disclosure.

The certification and disclosure process is coordinated through IEEE’s Development Office and IEEE Controllers Office staff (see Appendix C for contact information).

It is important to note that even if federal funds were not used to lobby or influence a federal grant, contract or cooperative agreement, or that the grant or contract in question falls below the \$100,000 threshold, it is still essential that any IEEE employees involved in a lobbying activity (including any volunteers whose expenses are reimbursed for lobbying-related activities)

complete a “IEEE Lobbying Activity Report” form (Appendix B) and submit it in accordance with its instructions. This is required regardless of whether an IEEE certification is required, since the lobbying expense has to be accounted for and disclosed by IEEE to Congress in quarterly filings and to the Internal Revenue Service in IEEE’s annual tax filing.

What Constitutes “Influencing” a Grant, Contract or Cooperative Agreement

In § 1352(a)(1) of the U.S. Code, “lobbying” is defined as “influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress” with respect to the awarding of the grant, the making of the grant or loan, or the entering into a cooperative agreement, including extensions, continuations, renewals, amendments, or other modifications and is expressly prohibited.

What does this mean, practically? There is no specific definition of the phrase “influencing or attempting to influence” provided in the federal law or associated regulations, so individuals must rely on common sense and the rule of reason. The following guidelines are offered as a reference:

- No IEEE employee or volunteer shall:
 - Use any federally appropriated funds to engage in any lobbying activity, such as described in Section 2 above.
 - Make a personal contact with a federal employee requesting their support for, or offering some special consideration with respect to a specific proposal for government support to IEEE (e.g. grant, contract or cooperative agreement). This includes any contacts describing why a proposed or pending IEEE grant or contract proposal should be funded, or offering any inducement or encouragement designed to obtain a favorable consideration of the proposal.
- IEEE employees and volunteers may make contacts using non-federally appropriated funds that are limited to:
 - Asking general questions such as what grant or other opportunities are available, and what the authorized process is for submitting a proposal for consideration. It is even safe to explain why you are interested (i.e. what we are hoping to get money for). Do not make a case for why the funds should be provided; that is done in the proposal itself.
 - Providing basic information about IEEE and its capabilities, and describing potentially relevant work being done with IEEE.
 - Inquiring about the current status of a pending proposal.
 - Responding to a request initiated by a federal employee to provide some technical or professional information or assistance related to a pending grant, contract or cooperative agreement. If there is any doubt as to the nature of the request, you should seek to protect IEEE by asking the agency representative, “This would not be considered lobbying, would it?” and documenting their response.

It should be noted that these guidelines are not intended to restrict IEEE's ability to seek federal contracts, grants or cooperative agreements working through the authorized process for submission of such proposals (which are usually outlined in the requests for proposals issued by the responsible agencies).

Nor do federal law and regulations seek to prohibit normal interchanges between grant recipients or contractor and the responsible program officer at an agency about the status of the funded work. However, there is no clear line marking where optimistic discussion of work progress ends and discussion of a new or renewal award begins. Federal program officers have received training on this matter and should know when to cut off discussion, but the responsibility is a joint one. If you are unsure, ask.

References:

The Lobbying Disclosure Act of 1995, 18 U.S. Code , Section 1913

The Byrd Amendment, 31 U.S. Code, Section 1352

34 CFR Part 82, Section 82.105 and 82.10

Cost Principles for Non-Profit Organizations, OMB Circular A-122,
http://www.whitehouse.gov/omb/circulars_a122_2004/

4. Restrictions on Gifts and Reimbursements to Government Officials

IEEE staff or volunteers may contemplate presenting small gifts as tokens of appreciation to elected officials or other government officials for their participation and support of IEEE activities. It is also not uncommon to consider providing meals at no cost or to offer to waive registration fees and/or reimburse the travel and related expenses for an elected official or government employee invited to participate in their official capacity as a speaker, organizer or participant in an IEEE activity, such as a conference or meeting.

In each of these instances, IEEE staff and volunteers should be cognizant that elected officials and other government employers are subject to strict gift, reimbursement and related ethics rules. As a general rule, IEEE staff and volunteers should refrain from gift giving, reimbursement, or gratuity of any kind. In those cases where presenting a gift or recognition is deemed important, IEEE staff and volunteers should investigate the relevant rules and seek any necessary advice or clearance from the recipient's employer or appropriate review body. The IEEE-USA Government Relations staff can assist with respect to queries or questions in a U.S. setting.

For example, under the standing ethics rules of the United States Senate and House of Representatives, no Member of Congress, officer or employee may knowingly accept a gift from IEEE (or any of its subordinate entities), unless it falls within a narrowly authorized list of enumerated exceptions, such as:

- gifts based on personal friendship;
- personal hospitality;
- free attendance at “widely attended” functions connected to their official activities;
- free attendance at charity events;
- necessary travel and related expenses for participation in officially-connected activities;
- trophies, plaques or other commemorative items offered as part of a ceremonial presentation;
- constituency events;
- educational/training events;
- informational materials; and
- items of nominal value such as baseball caps and T-shirts.

Each of these exceptions is subject to specific limitations and definitions that should be consulted in order to ensure compliance.

Similarly, executive branch employees may not accept gifts that are given because of their official positions or that come from certain interested sources (“prohibited sources”) such as persons who:

- are seeking official action by the employee’s entity;
- are doing or seeking to do business with the employee’s entity;
- are regulated by the employee’s entity; or
- have interests that may be substantially affected by performance or non-performance of the employee’s official duties.

There are also a number of exceptions to the executive branch’s ban on gifts from outside sources. These exceptions would allow the acceptance of gifts such as:

- modest items of food and refreshments offered other than part of a meal;
- gifts based on a personal relationship;
- free attendance at “widely attended” functions provided the attendance is in the interest of the agency;
- awards and honorary degrees;
- social invitations from persons other than prohibited sources; and
- items with little intrinsic value such as plaques, certificates, and trophies, which are intended solely for presentation.

These exceptions for federal employees are also subject to enumerated limitations and definitions. For example, in the case of an invitation to a social event attended by several persons

where no fee is charged to any person in attendance, a federal employee may accept the invitation as well as associated food, refreshments and entertainment, but not travel or lodging.

On January 21, 2009, President Obama signed an executive order concerning “Ethics Commitments by Executive Branch Personnel” (the “Order”). The Order requires every full-time, political appointee to sign an ethics pledge, which provides that appointees must not accept gifts or gratuities from registered lobbyists or lobbying organizations (limited exceptions apply, see enumerated list above). The Order is not limited to donors that provide lobbying services to others. The Order also prohibits gifts sent “indirectly” (i.e., to appointee’s spouse, sibling or child).

This introduction to gift and related ethics rules is not exhaustive but is intended to illustrate the nature of gift and reimbursement restrictions and what types of activities may be permissible. IEEE staff and volunteer contemplating gifts or reimbursements for travel (or waivers of registration or other fees) should also be aware that specific rules exist pertaining to all U.S. federal, state and local government employees, by agency and branch of government, as well as officials and employees of other national governments. To avoid creating an ethical problem for an elected official or government employee, it is critical to investigate the applicable rules and to abide by them.

References:

U.S. Senate, Standing Rules of the Senate, Rule XXXV, Gifts (<http://rules.senate.gov>)

U.S. House of Representatives, House Ethics Manual, Chapters 2-3, Gifts/Transportation (http://ethics.house.gov/Media/PDF/2008_House_Ethics_Manual.pdf)

Title 5, Code of Federal Regulations, sections 2635.201-205

Executive Order, “Ethics Commitments of Executive Branch Personnel” (21 Jan. 2009)
http://www.whitehouse.gov/the_press_office/Ethics-Commitments-By-Executive-Branch-Personnel/

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APPENDIX A KEY CONTACTS

IEEE Development Office

Makes the initial disclosure to appropriate federal authorities during the proposal submission of any qualifying lobbying contacts made while soliciting for that U.S. federal government grants, or cooperative agreements,

Karen Galuchie
Direct: +1 732 -562 -3860
Fax: + 1 732-981 -9515
Email: k.galuchie@ieee.org

IEEE Controllers Office

After the grant or cooperative agreement is awarded, the Controller's Office discloses to the appropriate federal authorities any qualifying lobbying contacts made related to a specific grant during the life of that grant.

Avishag Klatzkin
Direct: +1 732-562-6520
Fax: +1 732-562-5455
Email: a.klatzkin@ieee.org

IEEE Customer Operations

Discloses any lobbying contacts made on behalf of IEEE with respect to a federal contract.

William "Bud" O'Conner
Direct: +1 732-562-5313
Fax: +1 732-981-9334
Email: b.oconnor@ieee.org

IEEE-USA

Files quarterly reports with the United States Congress reporting IEEE's U.S. "lobbying" expenditures, provides information on these lobbying-related expenditures to the IEEE's Office of Tax Compliance, and assists IEEE entities in the U.S. to comply with any applicable state "lobbying" laws and reporting requirements.

Erica Wissolik
Direct: +1 202-530-8347
Fax: +1 202-785-0835
Email: e.wissolik@ieee.org

IEEE Office of Tax Compliance

IEEE's Office of Tax Compliance reports the total IEEE lobbying-related expenditures in Schedule A of the annual IRS Form 990 tax filing.

David Galicki
Direct: +1 732-562-5334
Fax: +1 732-562-6832
Email: d.galicki@ieee.org

Robert Danco
Direct: +1 732-981-3404
Fax: +1 732-562-6832
Email: r.danco@ieee.org

IEEE Office of International Corporate Regulatory Compliance

Oversees these disclosure and reporting processes to ensure that IEEE is abiding by all applicable national laws and regulations.

Anita Ricketts
Direct: +1 732-562-6009
Fax: +1 732-562-6832
Email: a.ricketts@ieee.org

IEEE LOBBYING ACTIVITY REPORT

REPORT ALL LOBBYING ACTIVITY AND EXPENDITURES. A lobbying activity is any oral, written or electronic communication (direct or indirect) with an executive or legislative official at any level of government made for the purposes of influencing a law, regulation or action, such as the awarding of grants, contracts and loans. It includes urging others to make such contacts. Lobbying does not include:

- Broad discussions of social, economic, and other policy issues that do not address the merits of specific legislation.
- Monitoring legislative, regulatory or other activities (unless part of other lobbying activity).
- Responding in writing to a request from an executive agency or legislature for specific information;

For a more detailed description, see the IEEE Lobbying Compliance Guidelines. Any IEEE employee, volunteer or contractor who believes he or she may be engaged in lobbying activities on behalf of IEEE in the United States of America should record and submit the details using the U.S. Lobbying Activity Log form. RETURN THE COMPLETED FORM OR ADDRESS QUESTIONS TO:

Erica Wissolik
Government Activities Manager
IEEE-USA
2001 L Street, N.W., Suite 700
Washington, DC 20036

Phone: +1 202-530-8347
Fax: +1 202-785-0835
Email: e.wissolik@ieee.org

Name: _____ [] Staff [] Volunteer [] Other

Phone Number: _____ Email Address: _____

Person Contacted (including title & office):

Subject Discussed (include specific bill, rule, or regulation information): _____

Date(s): _____ Time Spent in Hours: _____

Expenses Incurred: _____ (e.g. travel, food, lodging, etc. Pro rate if expenses were incurred as part of other non-lobbying activity)

Level of Lobbying Contact: Federal State Local

Type of Lobbying Activity (Check all that apply):

Influencing Legislation

- Preparation, research, drafting, introduction or consideration
- Modification, amendment, approval, passage or enactment
- Tabling, postponement, defeat or rejection
- Legislative motions
- Overriding or sustaining a veto
- Presidential/Governor Approval or veto

Influencing Agency Actions

- Proposal, consideration, promulgation or recession of a regulation
- Development or modification of guidelines or statement of policy
- Approval or rejection of a regulation
- Approval of grant, contract or cooperative agreement

Influencing Appointments

- Confirmation of appointments
- Nomination process
- Appointment to public boards or commissions

Influencing Executive Decisions

- Proposal, consideration, promulgation or rescission of an executive order

Gifts

As a general rule, IEEE employees should never give any of the Institute’s resources (i.e. a gift) to an elected U.S. official, any candidate for public office, government officials, or their immediate family members. What constitutes a “gift” is very broadly defined and may include entertainment, hospitality, services, transportation, lodging, meals, whether provided in kind, paid for, or reimbursed. In some cases, gifts of a modest value (including an appreciation plaque, or reimbursement for speaker expenses) to a government official or immediate family member of an official may be allowable, subject to the legal and ethical codes applicable to that federal, state or local official. If in doubt, prior to making a gift, consult IEEE’s Lobbying Compliance Guidelines and clear the gift in advance both with the concerned official and with the IEEE Washington office in order to confirm IEEE’s compliance with applicable rules and regulations.

Name of Recipient: _____

Office: _____

Description and estimated value of gift, etc.: _____

Failure to report lobbying activities and violations of lobbying laws and regulations could result in personal criminal and civil penalties, as well as put IEEE’s tax-exempt status at risk.

If you have any questions or concerns, please do not hesitate to contact Erica Wissolik, Government Activities Manager, at 202-530-8347 or e.wissolik@ieee.org