

Lobbying & Advocacy: Frequently Asked Questions

As not-for-profit, tax-exempt entities, The Johns Hopkins University (JHU) and The Johns Hopkins Health System Corporation (JHHS) are required to comply with federal, state, and local laws and rules related to ethics, lobbying disclosure, and political activity.

The Offices of Government and Community Affairs (GCA) and Federal Strategy are charged with executing the institution's advocacy agenda and serve as a resource to assist JHU and JHHS faculty and staff in interacting with all levels of government, including understanding laws to ensure compliance.

Below you will find some practical guidance to help understand (1) acceptable, per applicable laws, institutional political and lobbying activities and (2) which activities may trigger institutional reporting requirements (reports submitted semi-annually by GCA and Federal Strategy).

“Lobbying” generally includes oral, written, or electronic communication with a public official with intent to influence a legislative, regulatory, or policy change. Preparation for such contacts may also need to be tracked and disclosed. Federal, state, and local definitions of lobbying may differ: consult with Federal Strategy or GCA for guidance. Please note that federal, state, and local rules regarding lobbying and political activity are complex and subject to change.

QUESTIONS? CONTACT: (443) 997-5999 or gca@jhu.edu

Q & A: Could my activities fall under ‘lobbying’?

- 1) If I am invited to testify before a legislative committee, regulatory board or commission, what should I do?**

Contact **Federal Strategy (for federal entities) or GCA (for state or local entities)**. Professional staff in our offices can support you by providing practical guidance, demystifying the hearing process, and anticipating any political landmines to ensure you are well-prepared to appear before a legislative or regulatory body.

A reminder that all testimony should include the following disclaimer:

“The views expressed here are my own and do not necessarily reflect the policies or positions of (Johns Hopkins University/Johns Hopkins Health System).”

- 2) Are there guidelines for using Johns Hopkins letterhead when corresponding with public officials?**

Johns Hopkins letterhead should be used only when the writer has pre-approval to represent the institution on official business or writing “on behalf of” Johns Hopkins. Letters and e-mail expressing personal views, including views related to your research that are not official positions of the institution, should be written on personal stationery or using personal e-mail. When expressing personal views, the institution may be mentioned for identification purposes but the disclaimer detailed in question (1) should also be included.

3) What is the process for inviting public officials to campus?

First, obtain approval from your dean. Then, contact Federal Strategy or GCA. In some instances, we can help assist with logistics and shepherd the request through the appropriate public officials.

4) Should I notify Federal Strategy or Government and Community Affairs if I have requested a meeting with a public official or am participating in a “lobby day”?

Yes. Expenses and time associated with preparation and attendance may need to be reported as part of institutional lobbying disclosure filings completed quarterly or semi-annually. Please consult with Federal Strategy or GCA for more information on reporting requirements.

5) May I use institutional resources (phone, e-mail, letterhead) to call/write my representative, as part of a call to action (e.g. professional society or trade group)?

The differences between lobbying and advocacy can be subtle. Grassroots or issue advocacy is acceptable; however, as a precaution, we advise using personal letterhead and e-mail. Advocacy for a specific proposal, whether or not there is a ‘bill number’, is lobbying. Federal Strategy or GCA can provide further clarification or guidance.

6) May I offer a meal or gift to a public official?

As a general rule, faculty and staff should refrain from offering meals, tickets, travel, or other gifts of any value to public officials; such activity is prohibited or conditionally restricted by federal, state, and local laws. Gifts are allowed in certain situations, so please direct any questions to Federal Strategy or GCA.

7) If a public official requests my input in developing a piece of legislation or policy change, whom should I notify?

Alert your dean and Federal Strategy or GCA before agreeing to the request. Unless it is clear that you would be providing input in your personal capacity on your personal time, such activity may be construed as lobbying on behalf of Johns Hopkins, so let us guide you in how best to navigate your response. Additionally, our staff can advise you on the history and political context surrounding a given issue and help you discern whether you’re speaking as an individual subject matter expert or on behalf of Johns Hopkins.

8) Is there a distinction between “educating” public officials and “lobbying” them?

Though publishing and conducting nonpartisan analysis, study, or research is not considered lobbying, discussing it with a public official may be in certain circumstances. Advocacy and educational activities may constitute lobbying even if legislation is not yet pending. Before engaging in any such activity in a Johns Hopkins capacity, please contact Federal Strategy or GCA for guidance: we are here to help!

IMPORTANT: A federal law known as the Byrd Amendment (31 U.S.C. §1352) prohibits the recipients of federally sponsored grants from using those funds to lobby or influence public officials. If your research is federally-supported, it is important to check with Federal Strategy or GCA before conversations with Congressional members, staff, and high-ranking federal officials.