

Approved By: Board of Directors	Adopted Date: 08/21/18
Distribution: All Staff	Revision Date(s):
Category: Administration and Governance	Reviewed Date(s):

Printed copies are for reference only. Please refer to the electronic copy of this document for the latest version.

PURPOSE:

To outline how Open Door Community Health Centers (ODCHC) will meet the requirement set forth in Public Law 115-31, Section 503 - Anti-Lobbying.

DEFINITIONS:

Lobbying: An attempt by an organization to influence legislation (IRS Jan 3, 2018)

Direct Lobbying: Directly contacting members or employees of a legislative body, whether federal, state, or local, for the purpose of proposing, supporting or opposing legislation or advocating the adoption or rejection of legislation.

Grassroots Lobbying: Communicating with members of the general public, or any segment of the public (e.g. health center patients) to encourage them to contact members or employees of a federal, state, or local legislative body urging them to support or oppose legislations.

POLICY:

ODCHC will not use funds from a federal contract, grant or cooperative agreement for the following, except for normal and recognized executive-legislative relationships:

- Publicity or propaganda purposes.
- The preparation, distribution, or use of any kit, pamphlet, booklet, publication, electronic communication, radio, television, or video presentation designed to support or defeat the enactment of legislation before Congress or any State or local legislature itself, or designed to support or defeat any proposed or pending regulation, administrative action, or order issued by the executive branch of any State or local government, except in presentation to the executive branch of any State or local government itself.
- To pay the salary or expenses of any grant or contract recipient, or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulations, administrative action, or executive order proposed or pending before the Congress or State government, State legislature or local legislature or legislative body, other than for normal executive-legislative relationships or participation by an agency or officer of a State, local, or tribal government in policymaking and administrative process within the executive branch of that government.
- These limitations also apply to subawards/subcontracts under a Health Resources and Services Administration (HRSA) grant or cooperative agreement.

REFERENCES:

Public Law 115-31, Section 503

NACHC Sample Policy and Procedure on Legislative Mandates Restricting the Use of Federal Grant Funds, May 2018

Feldsman, Tucker, Liefer and Fidell LLC

Office of Federal Assistance Management, Bulletin Number 2018-04

ASSOCIATED DOCUMENTS:

Approved By: Board of Directors	Adopted Date: 08/21/18
Distribution: All Staff	Revision Date(s):
Category: Administration and Governance	Reviewed Date(s):

Printed copies are for reference only. Please refer to the electronic copy of this document for the latest version.

AG_HRSA Grant Restrictions

KEYWORD TAGS:

None