

## **Q&A on the Federal Honest Leadership and Open Government Act (HLOGA)**

On January 1, 2008, the Honest Leadership and Open Government Act (HLOGA) went into effect. This law requires that the University make good faith efforts to provide a report of the “lobbying activities” and “lobbying contacts” of all University employees, including faculty, that have taken place.

Because the law is relatively new and its requirements complex, an honest attempt to provide the required information should satisfy the University’s burden to make good faith efforts to comply.

The following questions and answers are intended to serve as guidelines to help you determine whether this law applies to you and, if so, what you should do to help the University comply with this legal obligation.

### **What is a “lobbying contact”?**

A lobbying contact is a communication with specified federal officials on behalf of the University that is intended to influence the federal official to take a position or perform an action. You do not have to be a “lobbyist” to have a lobbying contact under this definition.

### **What is a “lobbying activity”?**

A lobbying activity is work performed to support a lobbying contact, such as travel planning and preparation.

### **Who are the “specified federal officials” that the law applies to?**

The number of federal officials covered by HLOGA is extensive. In general, the law applies to contacts to elected officials, their staff, political appointees, high-level agency employees, and senior members of the military. If you have questions, please contact Kathy Eiler, Director of Federal Relations, at 949 824-5227 or [keiler@uci.edu](mailto:keiler@uci.edu).

### **Does this law mean that I must report every contact with the federal program officer for my contract or grant?**

No. HLOGA applies to contacts with high-level federal employees. Contacts with a program officer do not need to be reported. Please consult Kathy Eiler, Director of Federal Relations, if you have any questions about any contacts.

### **For what time period must I report my lobbying contacts?**

Lobbying contacts and lobbying activities must be reported quarterly. For example, the first quarterly 2015 report must cover contacts and activities that occurred between January 1, 2015 and March 31, 2015.

**When is the report due?**

The University must submit quarterly reports to the federal government. For example, if you have reportable contacts or activities that occurred between January 1, 2015 and March 31, 2015, please report them by **no later than April 1, 2015**. *The same pattern follows for each quarter.*

**If I have had lobbying contacts between January 1 and March 31, 2015, how should I report them?**

Lobbying time/expenses should be reported on the attached sample form. Completed forms should be returned to the Office of Government and Community Relations.

**What if I make a mistake?**

The law requires only good faith efforts to comply. There is no sanction for honest errors.

**How often are these disclosures required?**

The law requires that disclosures be made twenty days after the end of each quarter. This disclosure report is compiled and submitted by UCDC with data from all UC campuses.

**Will there be a University policy about all of this?**

The Office of the President is working on such a policy.

**If I have questions about this requirement, whom should I contact?**

If you have questions, please contact:

Kathy Eiler, [keiler@uci.edu](mailto:keiler@uci.edu), 949 824-5227, Director of Federal Relations