The Lobbying Analysis Tool

Is it a grant or contract?

What type of grant is it?

- General Operating Support grant
- Specific Project grant

This tool is intended for analyzing grants. There cannot be any lobbying in contracts. See the Expenditure Responsibility bubble, and follow that analysis for contracts.

General Operating Support grant:
- Grant can be used by organization for any purpose
- Proposal is consistent with "general operating support" and describes overall organizational activities, not a specific project
- Foundation may be sole funder

Yes → Ok!

No → Not fundable as submitted

Single funder → No lobbying permitted. Conduct lobbying analysis to confirm no lobbying → **Is there lobbying?**
- **Yes** → Not fundable as submitted
- **No** → Ok!

Specific Project grant:

Who is grantee? → **Public charity or equivalent?** → **How many funders?**

Multiple funders → **Does specific project include lobbying** → Conduct lobbying analysis to determine if you need to meet the requirements of the Project Grant Rule

Is there lobbying?
- **No** → Ok!
- **Yes** → (Does this grant satisfy the Project Grant Rule?)

Expenditure Responsibility → No lobbying permitted. Conduct lobbying analysis to confirm no lobbying → **Is there lobbying?**
- **Yes** → Not fundable as submitted
- **No** → Ok!

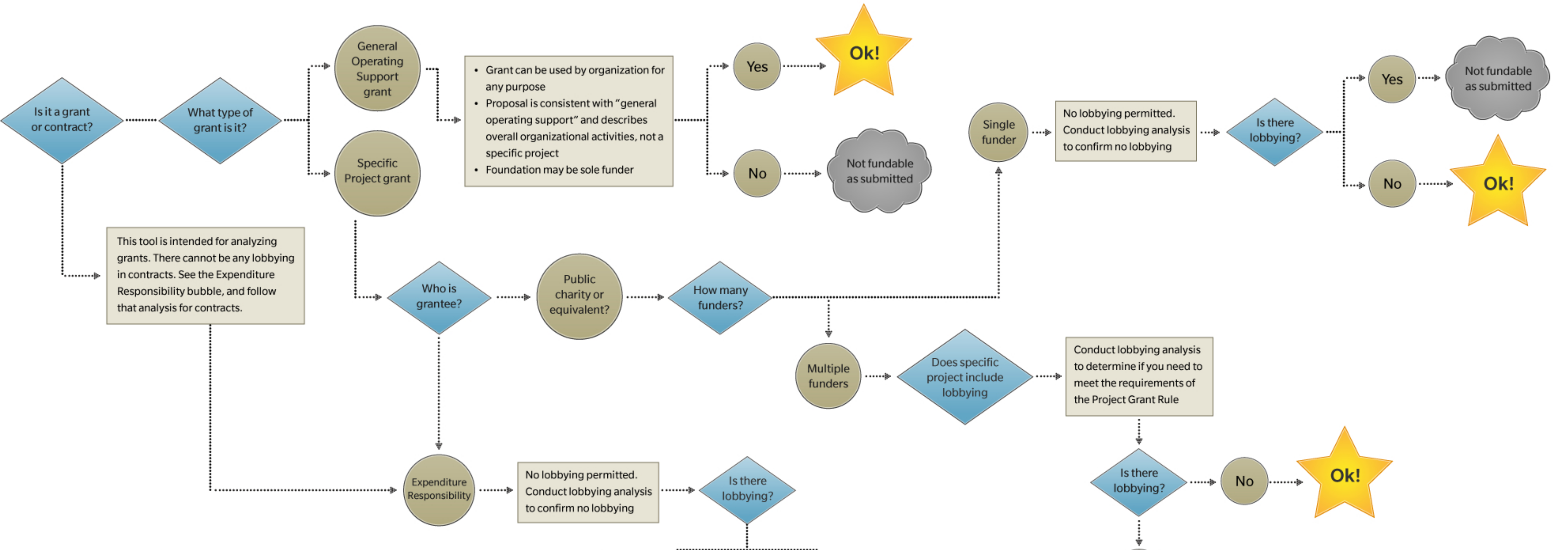## Is there lobbying? (Lobbying Analysis)

To satisfy the definition of direct or grassroots lobbying, all elements must be present.

Direct Lobbying
- ✓ Communication
- ✓ With a legislator, legislative staff member, or any government official participating in the legislative process
- ✓ Expressing a view about specific legislation or a specific legislative proposal

Grassroots Lobbying
- ✓ Communication
- ✓ With a segment of the general public
- ✓ Expressing a view about specific legislation or a specific legislative proposal
- ✓ AND, includes a "call to action"

Does this grant satisfy the Project Grant Rule?

In order to satisfy the Project Grant Rule, a private foundation must:

- ✓ Not earmark any part of the grant for lobbying

- ✓ Obtain an allocated budget showing that the amount of the grant, together with the other grants by the same foundation for the same project and year, does not exceed the amount budgeted for the project by the charity for activities that do not constitute lobbying

- ✓ Have no reason to doubt the accuracy of the grantee's representations

- **Yes** → Ok!
- **Unsure** → Get assistance
- **No** → Not fundable as submitted