The Lobbying Analysis Tool

Is it a grant or contract?

What type of grant is it?

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

Specific Project grant

Who is grantee?

Public charity or equivalent?

How many funders?

Multiple funders

Does specific project include lobbying?

Expenditure Responsibility

No lobbying permitted. Conduct lobbying analysis to confirm no lobbying

No

Not fundable as submitted

Is there lobbying?

Yes

Not fundable as submitted

Single funder

No lobbying permitted. Conduct lobbying analysis to confirm no lobbying

Is there lobbying?

Yes

Ok!

No

Ok!

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

Ok!

Not fundable as submitted

Yes

No

Get assistance

Not fundable as submitted