

Are there any exceptions?

The following are examples of activities that do not trigger the need for registration if they are the only activities undertaken:

- ✗ Doing your job as an LAUSD or other government employee or official or fulfilling a contract that you have with LAUSD;
- ✗ Negotiating the terms of a written agreement with LAUSD if selected pursuant to a bid, proposal, or Memorandum of Understanding;
- ✗ Providing professional services to a Paid Lobbying Organization which is already registered;
- ✗ Publishing news by a media channel of general distribution which is not distributed for the primary purpose of influencing LAUSD decision-making;
- ✗ Requesting or obtaining public information;
- ✗ Responding to an official LAUSD fundraising effort or awarding a grant solicited by LAUSD;
- ✗ Responding with requested information or participating in an oral interview for an LAUSD issued bid process;
- ✗ Soliciting an adjudicative action (where LAUSD officials are asked to determine the employment or enrollment status of an individual, for example);
- ✗ Soliciting a ministerial action (where LAUSD officials have little discretion in applying the rules); or
- ✗ Working as a union rep on matters *directly related* to the scope of representation as defined by law.

Enforcement

Non-compliance with the Lobbying Disclosure Code may result in one or more of the following sanctions:

- ☉ Late filing fee of \$50 per day;
- ☉ Record of violation published to online public registry;
- ☉ Automatic deduction of fines from existing contracts;
- ☉ Rejection of current or future bids or contracts;
- ☉ Debarment from contracting with LAUSD; and
- ☉ Disqualification or suspension from lobbying activities.

Lobbying Organization Checklist

- Pre-register as soon as you anticipate meeting a trigger
- Keep updated records of lobbying activities and expenses
- Review lobbying materials on the Ethics Office website to stay abreast of updates and important information

Who could be required to register?

- ✓ Law firms
- ✓ PR firms
- ✓ Vendors
- ✓ Contractors
- ✓ Consultants
- ✓ Unions
- ✓ Non-profits
- ✓ Advocacy groups

Case Studies

Example #1

Culver Consulting Firm is paid by Grape Cola Inc. to prepare presentations and recommend a strategy to help Grape Cola Inc. promote their products at LAUSD out of the scope of a bid process.

Culver Consulting Firm needs to register

Culver Consulting Firm qualifies as a Paid Lobbying Organization because they receive compensation to conduct lobbying activities to influence LAUSD action.

Example #2

Smart Choice is a non-profit devoted to promoting better nutritional habits in young people. They will spend \$15,000 this year on efforts to convince the LAUSD school board to approve a policy requiring schools to offer an even higher percentage of healthy choices in school lunches.

Smart Choice needs to register

Smart Choice is engaging in lobbying activities and plans to exceed the \$10,000 expenditure threshold; therefore it qualifies as a Small Expenditure Lobbying Organization.

For More Information

More detailed information about LAUSD's Lobbying Disclosure Program can be found in our *Lobbying Disclosure Code* and *Lobbying Disclosure Training Presentation* which are available online, through the Ethics Office Website. *If you have any questions, please do not hesitate to contact us.* We are here as resource to help you understand the requirements of the Lobbying Disclosure Program.



Ethics Office

Building Trust

Inside and Out

Lobbying Disclosure Program

What You Need To Know

- Who does this apply to?
- What is considered lobbying?
- What do you have to do to comply?
- Are there any exceptions?

LAUSD ETHICS OFFICE

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Background

The Los Angeles Unified School District (LAUSD) Lobbying Disclosure Program was instituted to enhance public trust and confidence in the integrity of our district's decision-making process. Revised in 2006, the revamped Lobbying Disclosure Program provides transparency via a public record of lobbying organizations, their representatives, and disclosure reports of lobbying activities and expenditures.

Who does this policy apply to?

A Lobbying Organization is defined as a person or group that: a) spends or expects to spend \$10,000 or more during a calendar year to lobby LAUSD, or b) receives or expects to receive payment from a client to lobby LAUSD. Any person or group that meets the definition of a Lobbying Organization is required to register and disclose information about their lobbying activities under LAUSD's Lobbying Disclosure Program.

What is a lobbying activity?

The following are examples of what are considered lobbying activities when they are undertaken with the primary purpose of influencing a decision or action under consideration by LAUSD officials:

- ✓ Attending, monitoring, or arranging LAUSD meetings, hearings, or other events;
- ✓ Gathering information related to LAUSD matters;
- ✓ Contacting or communicating with LAUSD officials, either personally or through an intermediary;
- ✓ Drafting recommendations for LAUSD's consideration or providing advice or recommending a strategy to a client;
- ✓ Promoting products or services out of the scope of a bid, quote, or proposal request issued by LAUSD;
- ✓ Providing gifts or other financial benefits to an LAUSD official or member of his/her household; and/or
- ✓ Seeking support or opposition from a third party (e.g. the public through media-related activities).

Snap Shot: What Triggers Registration?

Any sole-proprietorship, partnership, association, corporation, organization, or other group that meets either of the triggers below must register as a Lobbying Organization.

REGISTRATION TRIGGERS:

A	B
Spends \$10,000 or more in a calendar year to lobby LAUSD on its own behalf	Receives payment in any amount from a client to lobby LAUSD on the client's behalf
=	=
EXPENDITURE LOBBYING ORGANIZATION	PAID LOBBYING ORGANIZATION

Any entity that qualifies as both a Paid and Expenditure Lobbying Organization is recognized under the single category of Paid Lobbying Organization.

Lobbying Organizations are required to register with the Ethics Office within 5 business days of meeting the triggers.

What do you have to do to comply?



1 File Your Registration

To comply, file your registration using the LAUSD Ethics Office online disclosure system. The online system can be found at www.lausd.net/ethics.



2 Complete the Online Training

Review the flash training and take the online quiz - which is part of the registration process - in order to successfully register.



3 Pay Registration Fees

Fee per Lobbying Organization: \$200
Fee per Lobbying Representative: \$100
Fee per Client: \$150



4 File Quarterly Disclosure Reports

Lobbying Organizations are required by the Lobbying Disclosure Code to disclose their lobbying activities and related expenditures for each calendar quarter that they are registered.



What is a Lobbying Representative?

Any employee who is paid by a Lobbying Organization to spend 30 hours or more during a calendar quarter to lobby LAUSD is considered a Lobbying Representative. Lobbying Representatives must register under the Lobbying Organization that compensates them.