

POLITICAL CONTRIBUTIONS/LOBBYING:

POLICY:

It is the policy of The Arc of Monroe County to conduct its business in compliance with applicable federal, state and local laws and regulations, and to adhere to the highest ethical standards.

STANDARD:

The Arc is a non-profit company. Under IRS law, it's called a 501(c)(3). As a non-profit like this, it doesn't have to pay federal taxes. This means it's tax exempt. Because of this, The Arc can't help out political campaigns. It also can't do a lot of lobbying. Lobbying is trying to get the government to make certain decisions. These are usually things that matter a lot to the lobbyist. Examples include trying to influence:

- Whether legislation is passed or defeated
- Changes to a gubernatorial order
- Passing or changing regulations
- Trying to change local law

Lobbying also includes time spent trying to get a bill, regulation or resolution introduced.

Things that aren't lobbying:

- Submitting a bid or proposal
- Asking questions or comments if the government has asked people to review something

The Arc needs to be careful about lobbying. If it's not, it could lose its ability to stay tax exempt.

If The Arc or its staff will be lobbying, if their time costs at least \$5000, then they need to register as a lobbyist. Once we hit the \$5000 for any one person, anyone else who lobbies will need to register too.

The Arc needs to report any lobbying we've done. This includes:

- How long the lobbying activity took
- What was lobbied for or against

Each registered lobbyist needs to keep track how much time they spend on lobbying, to the nearest half hour. This includes time preparing to lobby. A lobbyist's rate is based on how much they earn. We would use their W-2 to get that information. Typically, we would take their yearly salary and divide it by 2080 hours to get their rate.

Lobbying expenses include:

- Phone calls
- Faxes
- Copies
- Postage
- The time it takes to create web pages or online content
- Advertisements that lobby

- Money spent on outside contractors to help with lobbying

A lobbyist's travel, meals and accommodations are not lobbying expenses.

Arc lobbyists or their family members can't give government officials or their family members gifts. If something is worth less or costs less than \$15, then it's OK to give. If it costs more or is worth more than that, then it's not OK to give. Family here means spouses and dependent children.

For this policy, these things are gifts either:

- Letting someone attend a charitable or political event for free
- Awards, plaques and other ceremonial items
- Honorary degrees
- Promotional items like pens, hats or mugs that have Arc's logo
- Personal gifts
- Meals and snacks at an event if everyone who is there can get them too

All registered lobbyists have to do training every 3 years. This is on the JCOPE website: jcope.ny.gov. JCOPE stands for: Joint Commission on Public Ethics

JCOPE does audits. They look to make sure that people who lobby are registered.

PROCEDURE – Political campaign activities:

1. Prohibition against The Arc's support of or opposition to Candidates for Public Office:
The Arc can never be a part of a political campaign for any public official. This means that The Arc can't say they support a certain candidate or that they oppose a certain candidate. The Arc also can't give any money to any candidate.

Personal involvement in political campaign activities:

Just because the agency can't help out a political campaign doesn't mean that people can't on their own. This means that if staff want to support a candidate on their own, they can. They just can't say that they're doing it on behalf of The Arc. The best thing would be to not mention The Arc at all when they support a candidate. They can't be treated any differently by The Arc if they support a particular candidate. The Arc will never pay people back for giving money to a candidate.

PROCEDURE – New York procurement law:

1. There are laws in New York State that talk about how agencies like The Arc get into contracts to get certain things. These are called procurement contracts. The Arc will follow the laws about procurement contracts. Questions about the laws should go to an agency officer.

Effective date:

1/1/07

The Arc of Monroe County

Revisions:

5/20/08

8/3/12

7/30/13

7/29/15

6/5/17

11/12/18