Wisconsin Partnership Program
Lobbying and Advocacy Policy and Guidelines

BACKGROUND
The Wisconsin Partnership Program (WPP) prohibits grant recipients from expending grant funds for purposes of lobbying, whereas advocacy and related expenditures are allowed. This policy defines advocacy and lobbying, and details the procedures utilized by WPP when potential or actual lobbying is identified within grant applications, budgets, reimbursement requests, and progress reports or any other grant related materials.

DEFINITIONS
Lobbying: Lobbying is any attempt to influence the introduction, enactment, or modification of legislation by the U.S. Congress or a state or local legislative body. This includes any oral, written, or electronic communication with members of state, federal or local legislative bodies or their staff towards that purpose. **Lobbying is prohibited, and related expenditures are unallowable.**

Lobbying includes activities that aim to support or defeat the enactment of specific legislation before the Congress or any State or local legislature or legislative body or designed to support or defeat any proposed or pending regulation, administrative action, or order issued by the executive branch of any State or local government.

Lobbying may also include costs for salary or expenses of any grant recipient, or agent acting for such a recipient, related to any activity designed to influence the legislation, appropriations, regulation, administrative action, or Executive order proposed or pending before the Congress or any State government, State legislature or local or tribal government or legislative body.

Examples of lobbying include:
- Asking legislators to vote for or against, or amend, introduced legislation.
- Emailing a “call to action” to your constituents urging them to contact their legislators in support of action on introduced legislation.
- Preparing or distributing materials with a focus on supporting or defeating the enactment of specific legislation before a legislative body, which may include kits, pamphlets, booklets, publications, electronic communication, radio, television, or video presentations.
- Influencing or attempting to influence an official or employee of any agency or legislative body in connection with any of the following actions: the awarding of governmental contracts, the making of any governmental grant, the making of any governmental loan, the entering into any cooperative agreement, and the extension, continuation, renewal, amendment or modification of any governmental contract, grant, loan, or cooperative agreement.

Advocacy: Advocacy involves taking a stance on a matter, usually in favor of or “advocating for” a concept, person, place, or thing. Advocacy may or may not involve political or legislative activity. While lobbying involves attempts to influence specific legislation or governmental awards (as defined above) at the local, state, or federal level, advocacy is focused on educating about a specific issue or cause. **Advocacy and related expenditures are allowable.**
Examples of advocacy include:

- Sharing with your legislators how a state or federal grant your organization received has helped your constituents.
- Inviting a legislator to visit your organization so they may see firsthand how governmental funding or policy makes a difference.
- Updating members of your own organization on the status of related legislation, without a call to action.
- Sharing nonpartisan analysis, study, or research.
- Providing technical assistance or advice to a legislative body or committee in response to a written request.

**POLICY**

The Wisconsin Partnership Program (WPP) prohibits grant recipients from expending grant funds for purposes of lobbying, whereas advocacy and related expenditures are allowed.

Lobbying is prohibited, and related expenditures are unallowable (see [WPP Allowable and Unallowable Grant Expenses Policy](#)).

Advocacy and related expenditures are allowable.

**PROCEDURES**

Applicants and grant recipients are strongly encouraged to consult with a member of the WPP Administrative staff before planning or undertaking any activities that could be considered lobbying to determine allowability.

When the review by WPP staff or by content reviewers of grant applications, budgets, reimbursement requests, and progress reports or any other grant related materials identifies potential or actual lobbying, the following procedures will be initiated by the WPP Administrative Leadership Team:

**Grant Applications (LOI/preliminary/full):**

If at any time WPP staff identifies lobbying activities, the applicant will be required to remove related activities from the proposal. If a determination is made that the scope of work cannot be completed without the proposed lobbying activities, the application will be rejected. No grant funds will be released until a determination is made by the WPP Administrative Leadership team that all lobbying activities have been removed from the approved scope of work.

**Active Grants:**

If at any time during the award period, the WPP administration identifies an instance or suspects that funds have been used for lobbying activities the WPP Administrative Leadership team will be notified. The WPP Administration Leadership team will take action in accordance with WPP’s Noncompliance and Suspension and Termination Policies to rectify or remediate the situation.