

WorkSource System Policies

# Political Activity Restrictions & Disclosure Requirements

POLICY #:	WS-6002
EFFECTIVE:	January 2, 2024
SUPERSEDES:	WIOA Lobbying Restrictions and Disclosure Requirements #3007 dated 7-1-2015

### PURPOSE:

This policy addresses the prohibition of using federal and state funds for political activities, including lobbying, and the disclosure requirements for political activities paid with non-federal and non-state resources.

Updates to this policy include:

- Replaced "Lobbying Restrictions" with "Political Activity" in the title of the policy to address prohibitions on funding political activities beyond lobbying.
- Removed references to "WIOA" and broadened the scope of political activity restrictions to all federal and state funds.
- Expanded the list of prohibited political activities to align with <u>2 CFR 200.450</u>.
- Added a hyperlink to the Certification Regarding Lobbying exhibit required in all federal and state funded contracts and grant agreements.
- Updated the hyperlink to the Disclosure of Lobbying Activities form.
- Updated the list of references.
- Non-substantial edits for clarity purposes.

# BACKGROUND:

Numerous congressional, federal, and state laws prohibit the funding of political activities with federal and state resources. Prohibited political activities include but are not limited to lobbying, campaigning on behalf of a candidate, or hosting campaign events.

# POLICY:

State and local organizations that receive federal or state funds, including staff and partners for these organizations, are prohibited from using federal grant or contract money for political activities. These organizations are also prohibited from receiving reimbursements from federal



contracts or grants for the costs of such activities.

Entities that do not receive federal or state funds, including but not limited to WorkSource partners, are also prohibited from participating in political activities when these activities occur under the auspices of the WorkSource system or within its environment (i.e., at a WorkSource Center or Affiliate Site, or in the service delivery environment of WorkSource).

As part of its oversight responsibility, WorkForce Central must ensure that entities operating or providing services within the local WorkSource system comply with this policy. WorkForce Central is not expected to regulate these entities' activities that occur outside the WorkSource system. Costs associated with the following political activities are unallowable:

- Attempts to influence the outcomes of any federal, state, or local election, referendum, initiative, or similar procedure, through in-kind or cash contributions, endorsements, publicity, or similar activity.
- Establishing, administrating, contributing to, or paying the expenses of a political party, campaign, political action committee, or other organization established for the purpose of influencing the outcomes of elections.
- Any attempt to influence:
  - The introduction of federal or state legislation.
  - The enactment or modification of any pending federal or state legislation through communication with any member or employee of Congress or state legislature (including efforts to influence state or local officials to engage in similar lobbying activity).
  - The enactment or modification of any pending federal or state legislation by preparing, distributing, or using publicity or propaganda, or by urging members of the general public, or any segment thereof, to contribute to or participate in any mass demonstration, march, rally, fund raising drive, lobbying campaign or letter writing or telephone campaign.
  - Any government official or employee in connection with a decision to sign or veto enrolled legislation.
- Legislative liaison activities, including attendance at legislative sessions or committee hearings, gathering information regarding legislation, and analyzing the effect of legislation, when such activities are carried on in support of or in knowing preparation for an effort to engage in unallowable lobbying.

To ensure compliance with these requirements, federal and state funded grant agreements and contracts must include the <u>Certification for Contracts, Grants, Loans, and Cooperative Agreements</u>.



If WorkForce Central and its federally and state funded subrecipients pay for political activities with non-federal and non-state resources, they must complete a <u>"Disclosure Form to Report Lobbying"</u> in accordance with its instructions. Subrecipients must submit the completed form to WorkForce Central who will then submit the form to the Washington State Employment Security Department (ESD), in accordance with ESD policy 1018 – *Political Activity Restrictions and Disclosure Requirements*.

### **REFERENCES:**

- 2 CFR 200.450
- 20 CFR 683.200(e)
- 29 CFR part 93
- RCW 42.17A.635
- RCW 42.52.180
- ESD Policy 1018 Political Activity Restrictions and Disclosure Requirements

#### APPROVED

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Jan 2, 2024

Date

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