



ADMINISTRATIVE DIRECTIVE

STATE AND FEDERAL LOBBYING	NUMBER	PAGE
	1.04-3	1 of 3
	EFFECTIVE DATE	
February 20, 2015		

I. **PURPOSE**

The purpose of this Administrative Directive is to establish procedures for lobbying on behalf of the City of Tucson and representing the City of Tucson's interests before governmental entities.

II. **POLICY**

The City of Tucson's Office of Intergovernmental Relations (IGR) shall be solely responsible for lobbying and representing the City of Tucson's interests at the Arizona State Legislature and the Arizona Governor's Office as required by state law; and the United States Congress and the Executive Administration. Having one office represent the City ensures compliance with state law and the policy direction of the Mayor and Council.

This policy is to ensure: (1) compliance with the legal requirements set forth in A.R.S. 41-1232.01 and federal lobbying requirements under the U.S. Lobbying Disclosure Act of 1995, and (2) to ensure that all City of Tucson actions before state and federal legislative bodies are consistent with direction provided by Mayor and Council.

III. **DEFINITIONS**

- A. Authorized Public Lobbyist (APL)** – A lobbyist for a Public Body who is other than a Designated Public Lobbyist or Lobbyist for Compensation. An Authorized Public Lobbyist is considered registered when listed on the Public Body's registration form by the Designated Public Lobbyist. He/she is not required to file expenditure reports directly to the Secretary of State. Instead, he/she reports expenditures to the Designated Public Lobbyist, who includes the expenditures on the Designated Public Lobbyist's Quarterly and Annual Expenditure Reports.
- B. Designated Public Lobbyist (DPL)** – The Secretary of State's "point of contact", who is required to file their Lobbyist Registration and Lobbyist Quarterly Expenditure Reports as well as the Public Body's Registration and Annual Expenditure Reports. The Designated Public Lobbyist signs all reports filed for him/herself and for the Public Body he/she represents. The Designated Public Lobbyist can be an individual or a firm whose primary professional function is lobbying in Arizona.
- C. Intergovernmental Relations (IGR)** – The City Manager's Office Division of Intergovernmental Relations (IGR) coordinates and implements key Mayor and Council strategic initiatives and is responsible for lobbying and representing the City's interest at the Arizona State Legislature, the Arizona Governor's Office, the United States Congress, and the Federal Executive Administration.
- D. Lobbying** – Any attempt by a group or individual to influence the decisions of government, including influencing passage or defeat of legislation or attempting to influence any formal rule making or any level of government. The effort may be a



ADMINISTRATIVE DIRECTIVE

STATE AND FEDERAL LOBBYING	NUMBER	PAGE
	1.04-3	2 of 3
	EFFECTIVE DATE	
February 20, 2015		

direct appeal to a decision maker in either the executive or legislative branches. It may include oral or written efforts of persuasion, campaign contributions, public-relations campaigns, and research supplied to legislative committees and staff of the Arizona Governor or U.S. President, and formal testimony before such committees.

- E. Lobbyist Registration** - The U.S. Lobbying Disclosure Act of 1995 requires lobbyists and the groups they represent to register and report contributions and expenditures to the respective bodies of Congress they lobby in. Likewise, pursuant to A.R.S. 41-1232.01, the State of Arizona requires municipalities and individuals to register with the Arizona Secretary of State to lobby on behalf of a public body.

IV. PROCEDURES

- A. Lobbying and advocating on the employee's own behalf** – In any instance where a City employee chooses to promote an issue or advocate for or against an issue on the employee's own behalf or on behalf of a non-City association, that employee shall not use his/her City title, affiliation, or any insignia in any manner that would suggest that the employee is acting or speaking as a representative of the City.
- B. Registering as an Authorized Public Lobbyist** – Only the DPL may designate other individuals to lobby on behalf of the City. The DPL must register these individuals as Authorized Public Lobbyists with the Arizona Secretary of State and submit an annual report outlining their activities. City employees, who have not been authorized by the DPL, shall not advocate for or against an issue, take an official position on legislation, or initiate discussions about proposed legislation as a representative of the City.
- C. Communicating with legislators and staff** – In the event a City employee is contacted by a legislator, legislative staff, or administrative staff about legislation related to the City, the City employee is required to notify IGR staff immediately. Unless approved by IGR staff, City employees shall not state the City's position on legislative or other intergovernmental issues.
- D. Testifying on state and federal issues on behalf of the City** – Employees planning to testify on any federal or state issue on behalf of the City or as a representative of the City shall seek approval from IGR staff prior to testifying to ensure the testimonial is consistent with Mayor and Council's initiatives and priorities, or to seek Mayor and Council approval.
- E. Providing input on state and federal issues** – In order to be effective, IGR requires input from City staff. Therefore, staff should respond promptly, within 24-72 hours, to all legislative inquiries from IGR. Responses, unless otherwise requested, shall be submitted via the City's online legislative tracking system, Legislative Online Arizona (LOLA). These responses should be clear, thorough, and informative, as they will assist Mayor and Council and City management in determining the City's positions on



ADMINISTRATIVE DIRECTIVE

STATE AND FEDERAL LOBBYING	NUMBER	PAGE
	1.04-3	3 of 3
	EFFECTIVE DATE	
February 20, 2015		

legislative issues. Any questions with respect to what is expected should be directed to IGR staff.

- F. **Providing technical support** – Occasionally, IGR will request the accompaniment of City employees for technical support at legislative meetings or committees. This is not considered lobbying as long as the employee is accompanied by IGR staff, the support remains on a technical level, and no advocacy is involved. Under these conditions, the City employee does not need to be registered with the Secretary of State as an authorized lobbyist.

Appendices None


References Lobbyist Handbook, Arizona Secretary of State
<http://www.azsos.gov/election/lobbyist/lobbyisthandbook.pdf>

Article 8.1 – Registration and Regulation of Lobbyists
<http://www.azleg.gov/ArizonaRevisedStatutes.asp?Title=41>

U.S. Lobbying Disclosure Act of 1995
http://www.senate.gov/legislative/Lobbying/Lobby_Disclosure_Act/TOC.htm

Review Responsibility and Frequency The Intergovernmental Relations Coordinator will review this directive as needed.

Authorized



City Manager

3-5-15
Date