

# Cornerstone Chartered Public School

## FIN-03 Lobbying and Political Activities Policy

**Purpose:** To ensure compliance with federal laws and regulations prohibiting the use of federal funds for lobbying or political activities, including the Lobbying Disclosure Act of 1995 (2 U.S.C. §1601 et seq.), 2 CFR §200.450, and 34 CFR Part 82.

Cornerstone Chartered Public School (Cornerstone) is committed to using federal funds appropriately, maintaining transparency, and avoiding any prohibited lobbying or political activities.

### Policy Statement:

Cornerstone employees, officers, agents, contractors, and representatives shall not:

- Use federal grant funds, including Charter School Program (CSP) funds, to engage in lobbying activities intended to influence federal, state, or local legislation or regulations.
- Charge the cost of lobbying activities to federal grants or contracts.
- Make any improper attempts to influence the awarding of federal contracts, grants, loans, or cooperative agreements.

If Cornerstone engages in permissible lobbying activities using **non-federal funds**, such activities must comply with the Lobbying Disclosure Act of 1995, including applicable registration and reporting requirements.

### Procedures:

#### 1. Certification Requirement:

- a. As a condition of receiving federal grants, Cornerstone will certify that no federal funds have been or will be used for prohibited lobbying activities, consistent with 34 CFR Part 82.

#### 2. Use of Non-Federal Funds:

- a. If Cornerstone uses non-federal funds to engage in lobbying activities that meet the thresholds requiring disclosure, the school will comply with the registration and reporting requirements under the Lobbying Disclosure Act (2 U.S.C. §1601 et seq.).

#### 3. Monitoring and Compliance:

- a. The Executive Director or designee will monitor all expenditures of federal funds to ensure compliance.
- b. Contracts funded with federal dollars will include language prohibiting the use of federal funds for lobbying.

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### **4. Reporting Violations:**

- a. Employees must promptly report any suspected violations of this policy to the Executive Director.
- b. Reports may be made confidentially and without fear of retaliation.

### **5. Consequences for Violations:**

- a. Violations of this policy may result in disciplinary action, repayment of misused funds, potential civil or criminal penalties, and notification to applicable authorities.

### **Legal References:**

- Lobbying Disclosure Act of 1995 (2 U.S.C. §1601 et seq.)
- 2 CFR §200.450 (Lobbying Costs)
- 34 CFR Part 82 (New Restrictions on Lobbying)

Adopted by the Board of Trustees on May 20, 2025.