

**Re: Higher Education Opportunity Act (HEOA) 2008**

**Use of Certain Federal Funds**

**Policy and Procedures**

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## **I POLICY STATEMENT**

It is the policy of University of St. Francis that no federal funds may be used to pay any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with any of the following federal actions:

1. the awarding of any federal contract
2. the making of any federal grant
3. the making of any federal loan
4. the entering into of any federal cooperative agreement, modification of any federal contract, grant, loan, or cooperative agreement.

It is the policy of University of St. Francis that no federal student aid funding may be used to hire a registered lobbyist or pay any person or entity for securing an earmark.

## **II PURPOSE**

The purpose of the policy is compliance with the Higher Education Opportunity Act 2008 provisions pertaining to lobbying and sections of individual federal grant award agreements pertaining to lobbying.

## **III. PROCEDURES**

The accounting department of the University serves as compliance department for the policy in partnership with the financial aid department and the department managers of specific federal grants.

The University's federal funding is audited annually by independent certified public accountants in compliance with OMB circular A-133.

The University's general ledger chart of accounts and purchasing and disbursement policies and procedures serve as controls to ensure compliance.

The University uses unique segments of its chart of accounts to provide adequate distinct accounting for all federal funds received and disbursed.

In accordance with purchasing policy and procedure, all purchases are pre-approved by both department budget managers and accounting department personnel. These employees are regularly informed of University policy regarding the purchase of lobbying services.

In accordance with disbursement policy, all disbursements are released only after review by accounting department personnel. These employees are apprised of University policy regarding the purchase of lobbying services.