

LD-203 Disclosure of Events to Honor Covered Officials

The Lobbying Disclosure Act (the “LDA”) requires registrants and their employees who are registered lobbyists to file the LD-203, a semiannual report of political contributions, due on January 30 and July 30 of each year. Any hospital currently registered under the LDA, and any active federal lobbyist employed by the hospital, is required to file the report.

Note that this brief is intended as a reference guide and does not constitute legal advice or represent or otherwise address all applicable authority and guidance on disclosing events to honor covered officials. You should consult the relevant laws, rules, and standards of conduct, or engage legal counsel and/or compliance personnel, should you have any questions about honoring covered officials in connection with a specific situation.

In addition to certifying compliance with the House and Senate gift rules, the filer must disclose on the LD-203 political contributions made to candidates for federal office as well as certain other payments and contributions made in connection with covered legislative and executive branch officials. One such payment that must be disclosed is any payment by the filer for events "to honor or recognize" a "covered" legislative or executive branch official. "Covered officials" include all Members and staff of Congress, as well as certain senior executive branch officials.

The House and Senate provide guidance that clarifies disclosure obligations under the LDA. The full text of the published guidance is available at: http://lobbyingdisclosure.house.gov/amended_lda_guide.html. Member hospitals and employees are encouraged to review this guidance in advance of filing LD-203s.

Generally, a Children's Hospital Association¹ member hospital must disclose the entire amount paid to sponsor an event that honors a covered official, regardless of whether the covered official honoree is only one of several individuals so honored. No allocation of costs is permitted, but members may use the Comments section to explain the circumstances.

For example, if a Children's Hospital Association member hospital holds an annual fundraising event that honors four different individuals, only one of whom is a covered official, the member must disclose on its LD-203 the total amount that it paid for the event. The cost of any award, plaque, or any other commemorative item given to the covered official should be listed separately on the report. All other costs for the event may be reported in one line item, using the term "various vendors" for the payee designation. Although not required, the filer may note in the Comments section that only one of the four honorees was a covered official.

¹ The Children's Hospital Association's legal name is the National Association of Children's Hospitals.