

<b>Higher Education Opportunity Act 2008 – Lobbying Procedure</b>	Procedure Number	9.3P
	Effective Date	September 13, 2011

### 1.0 PURPOSE

The purpose of the procedure is to articulate how LCCC ensures compliance with the Higher Education Opportunity Act 2008, 20 U.S.C.A. §§ 1001 (2011), *et seq.*, provisions pertaining to lobbying and sections of individual federal grant award agreements pertaining to lobbying.

### 2.0 REVISION HISTORY


Adopted on: 9/13/11

### 3.0 PERSONS AFFECTED

All LCCC employees are covered under this procedure.

### 4.0 PROCEDURES

- A. The accounting office of LCCC serves as compliance department for these procedures and will review purchase requests in partnership with the financial aid department and the department managers of specific federal grants. Individuals with signatory authority for requested purchases and /or disbursement must be familiar with and comply with the provisions of this procedure.
- B. LCCC's federal funding is audited annually by independent certified public accountants.
- C. LCCC's general ledger chart of accounts and purchasing and disbursement policies and procedures serve as controls to ensure compliance.
- D. LCCC uses unique segments of its chart of accounts to provide adequate distinct accounting for all federal funds received and disbursed.
- E. In accordance with purchasing policy and procedures, all purchases are pre-approved by both department budget managers and the President's Cabinet as appropriate. These employees are regularly informed of LCCC policy and procedures regarding the purchase of lobbying services.
- F. In accordance with disbursement procedure, all disbursements are released only after review by accounting department personnel. These employees are apprised of LCCC policy and procedures regarding the purchase of lobbying services.
- G. LCCC as an educational institution receiving Federal funding under the Higher Education Act of 1965, shall annually certify to the Secretary of Education that the requirements of the Higher Education Opportunity Act 2008, 20 U.S.C.A. § 1011m (2011), subsections (a) through (c) have been met.

REQUIRED APPROVALS	NAME/SIGNATURE	DATE
Originator(s) Name(s)	Carol Hoglund, Administration and Finance Vice President	7/12/11
Approval by President's Cabinet		9/13/11
Approval by President (Signature)		9/14/11