



Policy Number 3.5

Chapter: Administration

**Title: Communication with Covered Officials;
Lobbying**

**Division/Department: Administration/Office of
the Chief Executive Officer**

Policy Administrator: Chief Executive Officer

Adoption Date: 2/2/1998

Revision Dates: 8/8/2018,

1. PURPOSE

To ensure effective and appropriate management of the Auraria Higher Education Center's (AHEC's) operations and affairs, and to protect its interests, all communications between AHEC employees and the Auraria Board or certain other governmental officials concerning official business of AHEC must be authorized in advance. The purpose of this policy is to establish rules for all communications with Covered Officials.

2. DEFINITIONS

- 2.1. Advocacy: Activities carried out for the purpose of advancing AHEC's position on a political, business or legal matter through contacts with federal, state or local officials or their staff.
- 2.2. Auraria Executives Council: The council comprised of the AHEC Chief Executive Officer (CEO), President of Community College of Denver, President of Metropolitan State University of Denver, and Chancellor of University of Colorado Denver.
- 2.3. Constituent Institution: As defined in C.R.S. § 23-70-101(b), an institution of higher education at and within AHEC, including Community College of Denver (CCD), Metropolitan State University of Denver (MSU Denver), and University of Colorado Denver (CU Denver).
- 2.4. Covered Officials: Any local, state or federal official listed below:
 - 2.4.1. Covered Federal Officials: Federal government officials listed as covered in [2 U.S.C. § 1602](#), including both the executive branch and legislative branch.

- 2.4.2. Covered State Officials: Covered State Officials are listed in C.R.S. § 24-6-301 and include the Colorado governor, lieutenant governor, members of the general assembly, a member of a rule-making board or commission, and a rule-making official of a state agency which has jurisdiction over the subject matter of a rule, standard, or rate.
- 2.4.3. Covered Local Officials: All local officials listed in the [Revised Municipal Code of the City and County of Denver § 2-301\(2\)](#).
- 2.4.4. Lobbying: Any communication made on behalf of AHEC by any means for the purpose of influencing government officials including, but not limited to, an appropriations request, action on legislation, rules, regulations, contracts, nominations, or any other governmental program or policy, other than:
- A communication required pursuant to an existing AHEC contract, permit, license, grant or loan.
 - A communication required by subpoena or civil investigative demand, or otherwise compelled by statute, regulation or other action of a public agency.
 - Public testimony or written comments that do not address an official position of AHEC.
 - Personal communications using personal resources on topics other than official AHEC business.

3. POLICY

- 3.1. Communications other than those made in the ordinary course of AHEC business and within the assigned role and responsibility of the AHEC employee engaging in such communication require coordination and approval as follows:
- 3.2. Attorney General:
Written requests to the office of the Attorney General (AG) must be coordinated with the AHEC General Counsel. Requests for approval made to the General Counsel should show the appropriate Division Chief as copied. Certain department directors and managers may be authorized by the General Counsel to work directly with staff of the AG's office on routine or emergency issues. The Division Chief should be informed of such communications.
- 3.3. Auraria Executives Council:
Written correspondence with members of the Auraria Executives Council (AEC) or any of its members must go through the office of the CEO. The CEO should be informed of any requests received by AHEC staff from

AEC members for assistance in compiling data, coordinating research, etc. The CEO should be copied on any written responses.

3.4. Auraria Board of Directors:

Written correspondence with members of the Auraria Board of Directors must go through the office of the CEO. The CEO should be informed of any requests from Auraria Board members for information or assistance with compiling data, coordinating research, etc.

3.5. Senior Officers of the Constituent Institutions:

Written correspondence between AHEC staff and presidents, vice presidents, chancellors, vice chancellors, or other senior officers of the Constituent Institutions should be copied to the CEO.

3.6. External Agencies:

3.6.1. External agencies as to which official AHEC communications, other than communications in the ordinary course of business and within the assigned role and responsibility of the AHEC employee engaging in such communication, must be routed to the CEO for approval include, but are not limited to:

- Colorado Commission on Higher Education (CCHE) and Department of Higher Education (DHE)
- Office of State Planning and Budgeting
- Joint Budget Committee
- Regional Transportation District
- City and County of Denver
- Other federal, state and local agencies with jurisdiction or authority over a matter of AHEC's business or other interests.

3.6.2. The CEO should be copied on any correspondence with external agencies listed above. Such communications should have Division Chief approval. In the course of management of ongoing projects, the Division Chief may delegate communication responsibility to directors or managers.

3.7. Covered Federal, State and Local Officials:

Communications for the purpose of Advocacy, or for any purpose related to AHEC's business or legal interests, with Covered Officials must be routed to and approved by the CEO. This does not prohibit routine or emergency communications with law enforcement, fire prevention and response, or other state and local agencies as necessary for the safety and security of the campus community or for the routine business of the AHEC unit.

3.8. Lobbying:

All Lobbying communications must be routed to and approved by the CEO. No employee of AHEC is authorized to engage in Lobbying on behalf of AHEC without the express, prior consent of the CEO.

4. APPROVAL AND ADOPTION

This Policy has been reviewed and approved by the Board of Directors for the Auraria Higher Education Center.

Date: _____

Approved by: _____
Chairperson of the Auraria Board