



U.S. Department
of Transportation
**Federal Aviation
Administration**

Memorandum

Subject: Program Guidance Letter 90-1

Date: 2 FEB 1990

From: Manager, Grants-in-Aid Division, APP-500

Reply to
Attn. of:

To: PGL Distribution List

90-1.1 Current Program Guidance Letters.

The following PGL items are to be carried as current with the distribution of the new Order 5100.38A, Airport Improvement Program Handbook. All other outstanding items are addressed in the order and are cancelled.

PGL 85-1.7	Eligibility - Emergency Operations Centers
PGL 86-6.1	Airport Planning
PGL 87-2.2	Airport Planning Documents
PGL 87-4.1	Special Condition for ILS Grants Awarded Under the MLS Transition Policy
PGL 88-1.5	Noise Compatibility Program Eligibility
PGL 88-4.2	Revision to OMB Circular A-102 (retain the attached regulation, 49 CFR Part 18)
PGL 88-4.6	Title Insurance
PGL 88-5.2	MLS Transition Policy
PGL 88-8.1	Vertiport Planning
PGL 89-2.2	Project Support Where a Letter of Intent is Not Planned
PGL 89-3.1	Controlled Access to Airport Secured Areas
PGL 89-5.2	AIP Financial Integrity
PGL 89-5.5	Software Eligibility Under Planning Grants
PGL 89-6.2	FY-90 Grant Assurances
PGL 89-7.2	Contractor's Liability Insurance Coverage

90-1.2 Replacement of Tanks - Dick Angle (267-8825).

There have been several inquiries regarding the AIP eligibility of replacement and relocation of underground storage tanks (UST) necessitated by an AIP project. The cost of procuring a UST continues to be an unallowable AIP cost. The following guidance is to be used regarding relocation of a UST:

1. If the UST meets the EPA requirements and must be relocated because of an AIP project, such relocation is an

allowable cost of the project.

2. If the UST does not meet the EPA requirements and must be relocated because of an AIP project, such relocation is an allowable cost of the project subject to the limitations that the costs reimbursed cannot exceed the estimated cost of relocating a tank that meets the EPA requirements and the relocation must result in placement of a tank that meets the EPA requirements.

3. The relocation of a UST which does not meet EPA requirements with placement of a tank which does not meet the EPA requirements is not an allowable cost.

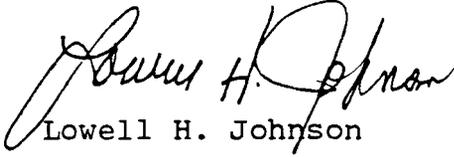
90-1.3 Auditing 5 Percent of AIP Grants - Dick Angle (267-8825). Please defer implementing the requirement in PGL 89-5.2 to conduct an audit of 5% of your grants. We have received a letter (copy attached) from the OIG that objects to our requirement. The OIG, however, has requested OMB's views on this. After the OMB responds we will reassess our position. In the interim, please continue to work with the OIG to provide audit assistance in areas where you believe there may be a significant problem.

90-1.4 Interim Guidance on Lobbying and Influencing Federal Employees - Mark Beisse (267-8826).

A new Section 1352, Title 31, United States Code (attachment 2), prohibits grant recipients from using grants to influence certain Federal financial transactions and requires disclosure of permitted lobbying activities. It affects grants or portions of a grant exceeding \$100,000, but does not apply to a sponsor's employees or to professional services for negotiating a grant application. Interim final guidance for the new restrictions on lobbying was issued in the Federal Register on December 20 by Office of Management and Budget (OMB), although publication of a regulation is not anticipated before March.

Until the regulation is published and final forms are developed, the OMB form shown in attachment 3 (Certification for Contracts, Grants, Loans, and Cooperative Agreements) should be submitted by sponsors with preapplications as supporting documentation. This form should be submitted with the application or draft scope of work on projects for which a preapplication is not required. The form should also be submitted for new grants if it has not otherwise been obtained.

The OMB form for disclosure of lobbying activities (attachment 4) should be submitted by sponsors when lobbying occurs. A semi-annual compilation of the OMB forms for disclosure of lobby activities is required. Questions and comments about the interim guidance on lobbying certification or disclosure may be directed to APP-510 during the rulemaking process.


Lowell H. Johnson

Attachments

Canceled


U.S. Department of
Transportation

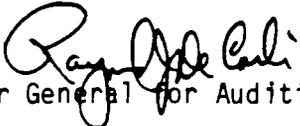
Office of the Secretary
of Transportation

Office of Inspector General

RESTRICTED

Subject Auditing 5 Percent of Airport Improvement
Program Grants Annually

Date December 1, 1989

From Raymond J. DeCarli 
Assistant Inspector General for Auditing

Reply to
Attn of

To Associate Administrator for Airports (APP-1)
Federal Aviation Administration

I have reviewed the Program Guidance Letter 89-5 issued by the Federal Aviation Administration's (FAA) Grants-in-Aid Division. I do not agree with the guidance to have audits performed on an arbitrary 5 percent of the Airport Improvement Program (AIP) grants awarded. The Single Audit Act, the Inspector General (IG) Act, and DOT Order 4600.15, Audits of State and Local Governments, do not authorize the FAA to require audits based on an arbitrary percentage of grant awards. Although the Single Audit Act provides for additional audit coverage, it requires that such additional coverage build on the single audit results. We are required by the IG Act to ensure that all non-Federal audit work complies with Government Auditing Standards. The DOT Order specifies that additional audit coverage will be provided for or arranged by the Office of Inspector General (OIG).

I have written to the Office of Management and Budget (OMB) requesting its views on the 5 percent grant audits (copy attached). Until I receive OMB's position, I suggest that the requirement in the Program Guidance Letter 89-5 not be implemented and that the following practice be followed.

1. Request the OIG to provide audit assistance in those areas where you believe a significant problem exists. We will evaluate the request and arrange necessary audit coverage at selected grantees. If the problems are crosscutting, we can arrange for a Modalwide audit that will include a selected number of grantees. If the problems are at only one grantee, the audit coverage will be restricted to that grantee. You may request the audit service any time you identify a problem or during our annual audit planning process when we request comments on the proposed audits, as well as request identification of areas needing audit coverage.
2. Revise the OMB Compliance Supplement to specifically include those areas where you believe the single audit coverage is inadequate. According to the Single Audit Act and OMB Circular A-128, single audit work is considered acceptable if the requirements contained in the

Compliance Supplement have been reviewed. I will be willing to provide staff assistance to help identify the areas and develop specific audit steps for the revised Compliance Supplement.

I will inform you of OMB's position when we receive it. In the meantime, if you have any questions, please contact me at 366-1964 or James Childers at 366-1974.

Attachment

-#-

Canceled

"§ 1352. Limitation on use of appropriated funds to influence certain Federal contracting and financial transactions

"(a)(1) None of the funds appropriated by any Act may be expended by the recipient of a Federal contract, grant, loan, or cooperative agreement 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 Federal action described in paragraph (2) of this subsection.

"(2) The prohibition in paragraph (1) of this subsection applies with respect to the following Federal actions:

"(A) The awarding of any Federal contract.

"(B) The making of any Federal grant.

"(C) The making of any Federal loan.

"(D) The entering into of any cooperative agreement.

"(E) The extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

"(b)(1) Each person who requests or receives a Federal contract, grant, loan, or cooperative agreement from an agency or requires or receives from an agency a commitment providing for the United States to insure or guarantee a loan shall file with that agency, in accordance with paragraph (4) of this subsection-

"(A) a written declaration described in paragraph (2) or (3) of this subsection, as the case may be; and

"(B) copies of declarations received by such person under paragraph (5).

"(2) A declaration filed by a person pursuant to paragraph (1)(A) of this subsection in connection with a Federal contract, grant, loan, or cooperative agreement shall contain-

"(A) a statement setting forth whether such person-

"(i) has made any payment with respect to that Federal contract, grant, loan, or cooperative agreement, using funds other than appropriated funds, which would be prohibited by subsection (a) of this section if the payment were paid for with appropriated funds; or

"(ii) has agreed to make any such payment;

"(B) with respect to each such payment (if any) and each such agreement (if any)-

"(i) the name and address of each person paid, to be paid, or reasonably expected to be paid;

"(ii) the name and address of each individual performing the services for which such payment is made, to be made, or reasonably expected to be made;

"(iii) the amount paid, to be paid, or reasonably expected to be paid;

"(iv) how the person was paid, is to be paid, or is reasonably expected to be paid; and

"(v) the activity for which the person was paid, is to be paid, or is reasonably expected to be paid; and

"(C) a certification that the person making the declaration has not made, and will not make, any payment prohibited by subsection (a).

"(3) A declaration filed by a person pursuant to paragraph (1)(A) of this subsection in connection with a commitment providing for the United States to insure or guarantee a loan shall contain—

"(A) a statement setting forth whether such person—

"(i) has made any payment to influence or attempt 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 that loan insurance or guaranty; or

"(ii) has agreed to make any such payment; and

"(B) with respect to each such payment (if any) and each such agreement (if any), the information described in paragraph (2)(B) of this subsection.

"(4) A person referred to in paragraph (1)(A) of this subsection shall file a declaration referred to in that paragraph—

"(A) with each submission by such person that initiates agency consideration of such person for award of a Federal contract, grant, loan, or cooperative agreement, or for grant of a commitment providing for the United States to insure or guarantee a loan;

"(B) upon receipt by such person of a Federal contract, grant, loan, or cooperative agreement or of a commitment providing for the United States to insure or guarantee a loan, unless such person previously filed a declaration with respect to such contract, grant, loan, cooperative agreement or commitment pursuant to clause (A); and

"(C) at the end of each calendar quarter in which there occurs any event that materially affects the accuracy of the information contained in any declaration previously filed by such person in connection with such Federal contract, grant, loan, cooperative agreement, loan insurance commitment, or loan guaranty commitment.

"(5) Any person who requests or receives from a person referred to in paragraph (1) of this subsection a subcontract under a Federal contract, a subgrant or contract under a Federal grant, a contract or subcontract to carry out any purpose for which a particular Federal loan is made, or a contract under a Federal cooperative agreement shall be required to file with the person referred to in such paragraph a written declaration referred to in clause (A) of such paragraph.

"(6)(A) The head of each agency shall collect and compile the information contained, pursuant to paragraphs (2)(B) and (3)(B) of this subsection, in the statements filed under this subsection and, on May 31 and November 30 of each year, submit to the Secretary of the Senate and the Clerk of the House of Representatives a report containing a compilation of the information contained, pursuant to such paragraphs, in the statements received during the six-month period ending on March 31 or September 30, respectively, of that year. The report, including the compilation shall be available for public inspection 30 days after receipt of the report by the Secretary and the Clerk.

"(B) Notwithstanding subparagraph (A)—

tee on Intelligence of the Senate, the Permanent Select Committee on Intelligence of the House of Representatives, and the Committees on Appropriations of the Senate and the House of Representatives in accordance with procedures agreed to by such committees;

"(ii) information referred to in subparagraph (A) that is specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy, is classified in accordance with such order, and is available only by special access shall be reported only to the Committee on Foreign Relations of the Senate and the Committee on Foreign Affairs of the House of Representatives or the Committees on Armed Services of the Senate and the House of Representatives (whichever such committees have jurisdiction of matters involving such information) and to the Committees on Appropriations of the Senate and the House of Representatives in accordance with procedures agreed to by such committees; and

"(iii) information reported in accordance with this subparagraph shall not be available for public inspection.

"(7) The Director of the Office of Management and Budget, after consulting with the Secretary of the Senate and the Clerk of the House of Representatives, shall issue guidance for agency implementation of, and compliance with, the requirements of this section.

"(c)(1) Any person who makes an expenditure prohibited by subsection (a) of this section shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such expenditure.

"(2)(A) Any person who fails to file or amend a declaration required to be filed or amended under subsection (b) of this section shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

"(B) A filing of a declaration or a declaration amendment on or after the date on which an administrative action for the imposition of a civil penalty under this subsection is commenced does not prevent the imposition of such civil penalty for a failure occurring before that date. For the purposes of this subparagraph, an administrative action is commenced with respect to a failure when an investigating official determines in writing to commence an investigation of an allegation of such failure.

"(3) Sections 3803 (except for subsection (c)), 3804, 3805, 3806, 3807, 3808, and 3812 of this title shall be applied, consistent with the requirements of this section, to the imposition and collection of civil penalties under this subsection.

"(4) An imposition of a civil penalty under this subsection does not prevent the United States from seeking any other remedy that the United States may have for the same conduct that is the basis for the imposition of such civil penalty.

"(d)(1) The official of each agency referred to in paragraph (3) of this subsection shall submit to Congress each year an evaluation of the compliance of that agency with, and the effectiveness of, the requirements imposed by this section on the agency, persons requesting or receiving Federal contracts, grants, loans, or cooperative agreements from that agency, and persons requesting or receiving from that agency commitments providing for the United States to insure

or guarantee loans. The report shall be submitted at the same time the agency submits its annual budget justifications to Congress.

"(2) The report of an agency under paragraph (1) of this subsection shall include the following:

"(A) All alleged violations of the requirements of subsections (a) and (b) of this section, relating to the agency's Federal actions referred to in such subsections, during the year covered by the report.

"(B) The actions taken by the head of the agency in such year with respect to those alleged violations and any alleged violations of subsections (a) and (b) of this section that occurred before such year, including the amounts of civil penalties imposed by the head of such agency in such year, if any.

"(3) The Inspector General of an agency shall prepare and submit the annual report of the agency required by paragraph (1) of this subsection. In the case of an agency that does not have an inspector general, the agency official comparable to an inspector general shall prepare and submit the annual report, or, if there is no such comparable official, the head of the agency shall prepare and submit such annual report.

"(e)(1)(A) Subsection (a)(1) of this section does not apply in the case of a payment of reasonable compensation made to an officer or employee of a person requesting or receiving a Federal contract, grant, loan, or cooperative agreement to the extent that the payment is for agency and legislative liaison activities not directly related to a Federal action referred to in subsection (a)(2) of this section.

"(B) Subsection (a)(1) of this section does not prohibit any reasonable payment to a person, or any payment of reasonable compensation to an officer or employee of a person, requesting or receiving a Federal contract, grant, loan, or cooperative agreement or an extension, continuation, renewal, amendment, or modification of a Federal contract, grant, loan, or cooperative agreement if the payment is for professional or technical services rendered directly in the preparation, submission, or negotiation of any bid, proposal, or application for that Federal contract, grant, loan, or cooperative agreement or for meeting requirements imposed by or pursuant to law as a condition for receiving that Federal contract, grant, loan, or cooperative agreement.

"(C) Nothing in this paragraph shall be construed as permitting the use of appropriated funds for making any payment prohibited in or pursuant to any other provision of law.

"(2) The reporting requirements in subsection (b) of this section shall not apply to any person with respect to—

"(A) payments of reasonable compensation made to regularly employed officers or employees of a person requesting or receiving a Federal contract, grant, loan, or cooperative agreement or a commitment providing for the United States to insure or guarantee a loan;

"(B) a request for or receipt of a contract (other than a contract referred to in clause (C)), grant, cooperative agreement, subcontract (other than a subcontract referred to in clause (C)), or subgrant that does not exceed \$100,000; and

"(C) a request for or receipt of a loan, or a commitment providing for the United States to insure or guarantee a loan, that

does not exceed \$150,000 including a contract or subcontract to carry out any purpose for which such a loan is made.

"(f) The Secretary of Defense may exempt a Federal action described in subsection (a)(2) from the prohibition in subsection (a)(1) whenever the Secretary determines, in writing, that such an exemption is in the national interest. The Secretary shall transmit a copy of each such written exemption to Congress immediately after making such determination.

"(g) The head of each Federal agency shall take such actions as are necessary to ensure that the provisions of this section are vigorously implemented and enforced in such agency.

"(h) As used in this section:

"(1) The term 'recipient', with respect to funds received in connection with a Federal contract, grant, loan, or cooperative agreement—

"(A) includes the contractors, subcontractors, or subgrantees (as the case may be) of the recipient; but

"(B) does not include an Indian tribe, tribal organization, or any other Indian organization eligible to receive Federal contracts, grants, cooperative agreements, or loans from an agency but only with respect to expenditures that are by such tribe or organization for purposes specified in subsection (c) and are permitted by other Federal law.

"(2) The term 'agency' has the same meaning provided for such term in section 552(f) of title 5, and includes a Government corporation, as defined in section 9101(1) of this title.

"(3) The term 'person'—

"(A) Includes an individual, corporation, company, association, authority, firm, partnership, society, State, and local government, regardless of whether such entity is operated for profit or not for profit; but

"(B) does not include an Indian tribe, tribal organization, or any other Indian organization eligible to receive Federal contracts, grants, cooperative agreements, or loans from an agency but only with respect to expenditures by such tribe or organization that are made for purposes specified in subsection (a) and are permitted by other Federal law.

"(4) The term 'State' means a State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, a territory or possession of the United States, an agency or instrumentality of a State, and a multi-State, regional, or interstate entity having governmental duties and powers.

"(5) The term 'local government' means a unit of government in a State and, if chartered, established, or otherwise recognized by a State for the performance of a governmental duty, the following entities:

"(A) A local public authority.

"(B) A special district.

"(C) An intrastate district.

"(D) A council of governments.

"(E) A sponsor group representative organization.

"(F) Any other instrumentality of a local government.

"(6)(A) The terms 'Federal contract', 'Federal grant', 'Federal cooperative agreement' mean, respectively—

"(i) a contract awarded by an agency;

"(ii) a grant made by an agency or a direct appropriation made by law to any person; and

"(iii) a cooperative agreement entered into by an agency.

"(B) Such terms do not include—

"(i) direct United States cash assistance to an individual;

"(ii) a loan;

"(iii) loan insurance; or

"(iv) a loan guaranty.

"(7) The term 'Federal loan' means a loan made by an agency. Such term does not include loan insurance or a loan guaranty.

"(8) The term 'reasonable payment' means, with respect to professional and other technical services, a payment in an amount that is consistent with the amount normally paid for such services in the private sector.

"(9) The term 'reasonable compensation' means, with respect to a regularly employed officer or employee of any person, compensation that is consistent with the normal compensation for such officer or employee for work that is not furnished to, not funded by, or not furnished in cooperation with the Federal Government.

"(10) The term 'regularly employed', with respect to an officer or employee of a person requesting or receiving a Federal contract, grant, loan, or cooperative agreement or a commitment providing for the United States to insure or guarantee a loan, means an officer or employee who is employed by such person for at least 130 working days within one year immediately preceding the date of the submission that initiates agency consideration of such person for receipt of such contract, grant, loan, cooperative agreement, loan insurance commitment, or loan guaranty commitment.

"(11) The terms 'Indian tribe' and 'tribal organization' have the meaning provided in section 4 of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450b)."

(2) The table of sections for subchapter III of chapter 13 of title 31, United States Code, is amended by adding at the end the following new item:

"1352. Limitation on use of appropriated funds to influence certain Federal contracting and financial transactions."

(b) The first report submitted under subsection (b)(6) of section 1352 of title 31, United States Code (as added by subsection (a)), shall be submitted on May 31, 1990, and shall contain a compilation relating to the statements received under subsection (b) of such section during the six-month period beginning on October 1, 1989.

(c) The Director of the Office of Management and Budget shall notify the head of each agency that section 1352 of title 31, United States Code (as added by subsection (a)), is to be complied with commencing 60 days after the date of the enactment of this Act. Not later than 60 days after the date of the enactment of this Act, the Director of the Office of Management and Budget shall issue the guidance required by subsection (b)(7) of such section.

(d) Section 1352 of title 31, United States Code (as added by subsection (a)), shall take effect with respect to Federal contracts, grants, loans, cooperative agreements, loan insurance commitments,

and loan guaranty commitments that are entered into or made more than 60 days after the date of the enactment of this Act.

The managers on the part of the Senate will move to concur in the amendment of the House to the amendment of the Senate.

Section 319 prohibits recipients of Federal grants, contracts, loans, or cooperative agreements from using Federal funds to pay persons to influence or to attempt to influence executive or legislative decisionmaking in connection with the awarding of any contract, grant, loan or cooperative agreement.

In the case of a payment, or progress payment, received by a contractor for performance of a contract, the portion of the payment properly allocable to the contractor's profit is not appropriated funds.

The managers agree that Federal actions defined in subsection (a)(2) do not include claims and settlements against the Federal Government. Activities related to such actions are not prohibited. The amendment is not intended to prohibit any citizen's right to petition Congress for a redress of grievances and does not proscribe legislative activities supporting or opposing programs within the purview of the government.

The section also requires that any person requesting or receiving a Federal grant, contract, cooperative agreement, loan, loan guarantee, or loan insurance, must report to the relevant agency the name of any lobbyists or consultants paid with non-Federal funds, the amounts such lobbyists or consultants were paid, and the purpose for which they were paid.

All Federal agencies will be required to file, on a semi-annual basis beginning May 31, 1990, a report compiling the information gathered regarding payments, including the names and addresses and amounts paid to all lobbyists or consultants who were paid with non-Federal funds for influencing (or attempting to influence) executive or legislative decisionmaking on Federal grants, contracts, cooperative agreements, loans, loan guarantees, or loan insurance.

The provision in subsection (c)(1) and (c)(2) sets civil penalties of a minimum of \$10,000 and a maximum of \$100,000 for each violation of the prohibition on the use of Federal funds to pay lobbyists and for each failure to report the information required when they are paid with non-Federal funds.

In determining whether to impose a civil penalty, and the amount of any such penalty, by reason of a violation by any person, the head of an agency shall consider the nature, circumstances, extent, and gravity of the violation, the effect on the ability of such person to continue in business, any prior violations by such person, the degree of culpability of such person, the ability of the person to pay the penalty, and such other matters as may be appropriate.

The provisions do not prohibit any reasonable payments to consultants (or officers or employees of persons) for professional, technical, or other similar services in connection with meeting requirements for receiving Federal contracts, loans, or cooperative agreements.

The managers agree that "agency and legislative liaison activities" referred to in subsection (e)(1)(A) include the provision of in-

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to 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 the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to 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 this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobby Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Signed _____ Dated _____
Sponsor's Authorized Representative

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for financing 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 a covered Federal action. Use the SF-LLL-A Continuation Sheet for additional information if the space on the form is inadequate. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, state and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee", then enter the full name, address, city, state and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, state and zip code of the lobbying entity engaged by the reporting entity identified in item 4 to influence the covered Federal action.
(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. Enter the amount of compensation paid or reasonably expected to be paid by the reporting entity (item 4) to the lobbying entity (item 10). Indicate whether the payment has been made (actual) or will be made (planned). Check all boxes that apply. If this is a material change report, enter the cumulative amount of payment made or planned to be made.
12. Check the appropriate box(es). Check all boxes that apply. If payment is made through an in-kind contribution, specify the nature and value of the in-kind payment.
13. Check the appropriate box(es). Check all boxes that apply. If other, specify nature.
14. Provide a specific and detailed description of the services that the lobbyist has performed, or will be expected to perform, and the date(s) of any services rendered. Include all preparatory and related activity, not just time spent in actual contact with Federal officials. Identify the Federal official(s) or employee(s) contacted or the officer(s), employee(s), or Member(s) of Congress that were contacted.
15. Check whether or not a SF-LLL-A Continuation Sheet(s) is attached.
16. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, D.C. 20503.

DISCLOSURE OF LOBBYING ACTIVITIES
CONTINUATION SHEET

0348-0046

Reporting Entity: _____ Page _____ of _____

Cancelled