

Portland Public School District 1st Reading

DATE OF FIRST READING: July 22, 2025

PUBLIC COMMENT FOR
Lobbying Registration Policy
x.xx.xxx-P:
Title of Policy

The Portland Public School District is providing Notice of Proposed Revised Policy and Public Comment to offer interested parties reasonable opportunity to submit data or comments on the proposed policies noted below.

Public comment may be submitted in writing directly to the district or through the district website noted below. Written comments must be submitted by 5:00pm on the Last Date for Comment listed below.

Open for Comment until at least:
August 12, 2025

Summary: **New Lobbying Registration Policy x.xx.xxx-P**

1st Reading by: **Director Michelle DePass** - Portland Public School Board, Policy Committee

Recommended for a 1st Reading by: Portland Public Schools Board of Education Policy Committee

Draft Policy Web Site: <http://www.pps.net/draftpolicies>

Contact: **Rosanne Powell**, Senior Board Manager
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Draft Policy Comment Form: <https://forms.gle/VqYbmVA36qqADj6n6>

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PORTLAND PUBLIC SCHOOLS

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STAFF REPORT

Date: July 2, 2025
To: Board of Education
CC: Dr. Kimberlee Armstrong, Superintendent
Sharon Toncray, General Counsel
From: Liz Large, Contracted Senior Legal Counsel
Subject: Lobbying Registration Policy

BACKGROUND & ANALYSIS

In January 2025, the Policy Committee initiated the drafting and consideration of a proposed Lobbying Registration policy, recognizing that the Board and District staff regularly engage with potential vendors or other interested parties, who seek policy, contract, or expenditure decisions and may seek to influence those decisions. Over several meetings, the Policy Committee revised draft language to require an individual or entity to register on the District's website if it is engaging with staff or Board members more than five hours per quarter with the intent to influence a policy or expenditure in which the individual/entity has an economic interest of \$100,000 or more.

Excluded from the registration requirement are certain contracts subject to the public procurement process (e.g., Requests for Proposals, Invitations to Bid), collective bargaining agreements, general marketing communications, performance of existing District contracts, or advocacy when there is no direct financial interest.

The Policy Committee's stated purpose of the registration is to create transparency about who is seeking to obtain certain policy, contract, or expenditure decisions. At this time, the policy requires disclosure, but does not contain an enforcement mechanism. This decision was made in recognition of the staff constraints the District is experiencing.

RELATED POLICIES/BEST PRACTICES

Ethics & Conflict of Interest Policy: 5.10.066-P

FISCAL IMPACT

Staff time to create a website and other communications regarding registration obligation, staff oversight of the process. No new FTE are expected to be hired.

COMMUNITY ENGAGEMENT (IF APPLICABLE)

Draft policy was on Policy Committee agenda January 13, February 26, April 3, May 12, and June 23 for public meeting and comment.

TIMELINE FOR IMPLEMENTATION / EVALUATION

As soon as practicable after formal adoption, likely within 90 days.



Board Policy

x.xx.xxx-P

Lobbying Registration Policy

Purpose

Portland Public Schools is committed to conducting contracting and procurement processes with transparency, integrity, and trust, and has comprehensive public contracting and purchasing policies and practices. District staff and members of the Board of Education regularly approve contracts and expenditures. It is important for the District to inform the public about individuals or entities that engage in lobbying with the District for the purpose of influencing policy making or the awarding of high-value contracts and expenditures.

This policy is in addition to any other District requirement or legal obligation related to contracting, conflicts of interests, or ethical implementation of District policies and programs.

Definitions

A. Eligible Contracts and Expenditures: District expense contracts, expenditures, or other economic interests that are expected to exceed \$100,000 in a fiscal year, but Eligible Contracts & Expenditures do not include:

- Contracts subject to competitive procurement processes under the PPS Purchasing & Contracting rules, including Request for Proposals (RFP), and Invitations to Bid (ITB). See [PPS Purchasing & Contracting Rules](#).
- Collective bargaining agreements

B. Engagement: Includes direct communication such as emails, phone calls, text messages, virtual or in-person meetings, or other direct outreach to District staff or Board members.

Registration Requirements

When an individual or entity Engages with District staff or Board members for the purpose of influencing policy making or the awarding of an Eligible Contract or Expenditure with the District, the individual and the entity they represent, if applicable, must register with the District if such Engagement with District staff or Board is expected to total or totals more than five (5) hours in a calendar quarter. Performing services under an existing PPS contract does not constitute Engagement under this policy.

District Registration

The District shall establish a public registration and post the registrations on its website for those required to register under this policy.

- Registration information shall include:
 - Name of the individual(s) and entity/ies they represent
 - General nature of the policy, contract or expenditure that is the subject of the Engagement with District staff or Board members

- Registrations are required to be maintained for at least 90 days after the individual or entity has its final Engagement with District staff or Board members for the purpose of obtaining an Eligible Contract or Expenditure.

Exceptions

This policy does not apply to:

- Individuals, groups, or entities that are advocating without compensation for District funding, policies, contracts, expenditures, or other decisions in which there is no direct financial impact to them.
- General marketing communications.
- Performance of an existing contract with the District.

Compliance with Other State Requirements

In addition to complying with this policy, individuals and entities engaging with District staff or Board members for the purpose of influencing policy making or the awarding of an Eligible Contract or Expenditure are expected to comply with Oregon ethics statutes (ORS chapter 244) and applicable District policies, as are District staff and Board members.