

ALERT

OPM's New PLUM Website Facilitates LDA Reporting; *Sign up for Webinar to Learn More*

September 19, 2025

Over the summer, the Office of Personnel Management (OPM) formally unveiled a website that will help corporations, trade associations, membership organizations, and lobbying firms navigate the twists and turns of the Lobbying Disclosure Act (LDA) more easily. This Administration's OPM effectively launched the PLUM Reporting and PLUM Data site, which has much of the quadrennial Plum Book information updated to June 30, 2025, listing the names and titles of Presidential appointees as required under the Periodically Listing Updates to Management (PLUM) Act.

Lobbying under the LDA definitions involves certain direct communications with officials in Congress as well as "covered executive branch officials." This is a statutorily defined term that includes the President and Vice President, employees in the Executive Office of the President, one-star generals and above (and their equivalents in the other branches of the military), political appointees paid at Executive Schedule levels I to V, and Schedule C employees. Although it is clear that Cabinet Secretaries are paid at Executive Schedule I, it is not always readily apparent which political appointees are paid at Levels II, III, IV, or V. The real-time identities of Schedule C appointees also often have been elusive.

In the past, LDA registrants turned to the Plum Book to figure out whether an executive branch employee with whom they communicated is a covered official and, thus, the communication counts as lobbying. The Plum Book, however, is published by OPM only every four years at the tail-end of a President's term. The most recent version is from 2024, and it shows the appointments and pay scales, etc., but has the names of the appointees from the Biden Administration. This lagging data is not such a problem with the

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Executive Schedule positions since the titles remain relatively constant across Administrations, but it is not that helpful with respect to Schedule C appointees. The new website and data bring the information into the current Administration, with the data updated for most agencies as of June 30, 2025.

Even for those corporations and trade associations using the tax method (Method C) and Internal Revenue Code definitions to file their quarterly LD-2s, the new PLUM website will prove useful. Under this method, the definition of covered executive branch officials is different from the LDA definition, and Method C filers need to know different information, such as the identities of the sub-offices of the White House Office within the Executive Office of the President. The new PLUM website helps in this regard.

This near-real-time information will be particularly helpful with determining, based on the officials with whom they communicate, if employees need to be registered as new federal lobbyists or de-registered as federal lobbyists. The data also will help with reporting total lobbying expenditures every quarter.

In order to help clients and others navigate the new PLUM website and take full advantage of the near-real-time data for LDA purposes (whether using the LDA definitions or the IRS definitions), we invite you to a very short webinar on **Wednesday, October 1, 2025, at 3 p.m.** The webinar will provide timely information to use in your process leading up to the next quarterly LDA Form LD-2 due on October 20, 2025

Register for the webinar [here](#)