

## Political Activity Guidelines

### Section 1. PURPOSE AND SCOPE

Clark University is committed to active citizenship and, as a result, encourages faculty, staff and students to exercise their right to participate as individuals in the political process, whether they are running for office, reaching out to their elected officials, or expressing their views in public or private forums. At the same time, no member of the university community should feel any institutional pressure to support a particular candidate or position.

The purpose of these guidelines is to specify permitted use and restrictions of university facilities and resources for politically-related activity on campus by employees. As a tax-exempt entity, Clark is prohibited by federal law from participating in or attempting to influence campaigns for any elective public office or any political initiative. The university may not endorse a candidate or ballot proposal, provide or solicit financial or other support for candidates or political organizations, or establish political action committees. The exception is for certain legally permitted lobbying activities that are carried out by Clark's registered lobbyists within the Office of Government and Community Affairs, and for Clark's promotion of educationally-oriented ballot initiatives that are supportive of the advancement of education.

### Section 2. DEFINITIONS

**Campaign Activity:** Directly or indirectly participating in or intervening in any political campaign on behalf of or in opposition to any Candidate for elective office or the promotion or opposition to a ballot referendum. Examples of Campaign Activity include raising funds or canvassing for a Candidate, recruiting volunteers, distributing a Candidate's campaign materials or sponsoring the appearance of a Candidate for public office.

**Candidate:** A person who has filed a formal declaration of candidacy for an elected, public office or has made a public statement of their candidacy prior to the legal opportunity to declare a candidacy.

**Lobbying:** Acting directly or soliciting others to act for the purpose of promoting, opposing, amending, or influencing any action or inaction by any member of the executive or legislative branch of government or any public corporation.

**Political Activity:** Activities that are not campaign activities nor involve the promotion or opposition to a ballot referendum, but may include voter education and registration, Candidate forums, public opinion polling, writing, speaking or contributing to political opinion pieces in a manner that may suggest to others that Clark endorses the opinion, responding to constituents as a public official, and get out the vote events, as long as they are non-partisan and follow the provisions of this policy.

**Political Organization:** any entity that involves itself in the political process, including political parties, non-governmental organizations, and special interest advocacy groups.

**Student Organization:** University-recognized student organizations.

### **Section 3. PROCEDURES AND ENFORCEMENT**

This guidance applies to Clark University faculty, staff, and students.

#### **3.1 Faculty and Staff**

Employees who engage in political campaigns should do so in their individual capacity. If a faculty or staff member is listed as a supporter of a political campaign or initiative, it should be without mention of institutional affiliation, or with a disclaimer indicating that their actions and statements are their own and not those of the university. University employees should not engage in political activity at university functions or through official university publications, channels or mediums. No employee should feel pressured by colleagues to contribute to, or perform tasks in support of, a political campaign.

Employees must not be asked to perform tasks related to partisan political activities during working hours. Employees who hold public office or are otherwise involved in campaign and other partisan political activities are prohibited from using university funds, logos/marks, services, supplies, vehicles, inter-office or electronic mail, or social media accounts when conducting political activities.

Employees running for a political office may be required to complete a disclosure form and ensure there will be no real or perceived conflict of interest between their position at the University and the political office in question. The completed form must be approved by the direct supervisor and the Vice President for Government and Community Affairs.

#### **3.2 Students and Student Organizations**

University-recognized student organizations may participate in a political campaign on behalf of any candidate for public office as long as their campus-based activities comply with university policies and procedures.

Clark student organizations specifically created to advocate for the election of a political candidate or ballot initiatives cannot receive funding from the university. They also cannot receive student activity fees unless the program is promoted to all students and in line with their mission. These student organizations are also not permitted to use university imagery, logo, name or likeness, or its facilities or resources for activities prohibited by this or other university policies or guidelines, except as otherwise allowed by this guidance.

Distribution of campaign materials is generally prohibited on campus and within campus housing facilities. However, university-recognized student organizations are permitted to reserve information tables for the purposes of distributing information about candidates, provided they follow Clark's policies and procedures for such tables, including making a reservation through the Events or Student Activities Office.

Student publications may run editorials expressing the editors' views on candidates for public office, provided that the publication's editorial policy is free of editorial control by university administrators or faculty advisors. A statement on the editorial page should indicate that "*the views expressed are those of the student editors and not those of Clark University.*"

Note that students receiving Federal Work Study funds are prohibited from engaging in any work assignment related to political campaigns.

### **3.3 Departmental External Communications**

Academic and administrative departments should avoid making public statements on “external” policy matters (state, national, or international policy matters) that are politically oriented or sensitive. Public statements are generally defined as statements made to or on news or social media outlets that can be reasonably believed to be statements of or on behalf of the University. If any employee feels a statement is needed, they should contact Clark’s Vice President of Marketing and Communication or Vice President of Government and Community Affairs to discuss whether or not an institutional response to the issue is warranted. If faculty desire to issue an independent statement they can absolutely do so, however it should be signed by the specific professors in their individual capacity rather than on behalf of the University. Those in the department with dissenting views can express their respective opinions in a similar capacity.

### **3.4 Use of Campus Facilities and Resources**

Use of university facilities and resources in support of a political candidate, party, referendum or political action committee (PAC) that could give the appearance that the university is supporting one candidate or position over another is not permitted.

*Prohibited Uses: Including but Not Limited to the Following*

- A. Using official university stationery, wordmark, seal, name, logo and likeness, email, telephones, computers, printers and copiers.
- B. Providing mailing lists, office space, telephones, photocopying, computers or other institutional resources.
- C. Posting a hyperlink on a university-administered website or social media page to a candidate or campaign site.
- D. Making a campaign donation using University funds.
- E. Providing gifts and honoraria for public officials, including meals and tickets to sporting events that is valued in excess of \$50.
- F. If the university believes that one or more postings on a university-administered website or social media page creates the impression that the university has endorsed a particular candidate or a particular side of a public referendum, it may delete the post in question or request that the poster edit their post to include a disclaimer stating that “*the opinions expressed are attributed to the author and do not represent the views of Clark University.*”

This list is only a sample of the type of uses that are prohibited. If you have questions or believe that an exception is warranted due to unique circumstances, please contact the Office of Government and Community Affairs.

*Approved Uses*

- A. Subject to university policies on permission and scheduling, recognized student organizations may use university facilities for partisan political purposes, in accordance with the policies established by Office of Student Leadership & Programming.

- B. If an appearance by a declared candidate for public office or a group supporting a public referendum is broadly publicized to nonmembers of the Clark community or is co-sponsored or paid for by outside organizations, the sponsors must rent the space from the university on the same terms that are available to any group wishing to use such space. If space is rented to a candidate in an election, any competing candidate would be able to rent space on the same terms. Depending on the size of the event, the sponsors may also be responsible for the costs associated with having adequate University Police presence.
- C. Candidates may be invited to appear on campus in a non-candidate capacity (i.e. to participate in a class) provided that no campaigning or fundraising is done at the event and a non-partisan atmosphere is maintained. Any candidate desiring to appear on campus for a campaign-related event or purpose must be pre-approved by the Vice President for Government and Community Affairs.
- D. Candidate forums or debates may be held on campus as part of the university's educational mission, as long as invitations to participate are non-partisan in approach.
- E. Voter education, drives, polling and registration activities are allowable as long as they are nonpartisan.
- F. Employees should take special care in relation to any above-described activities, to avoid the appearance of institutional endorsement.

### **3.5 On-Campus Appearances by Candidates or Designees**

Except to the extent that they are appearing as a part of a candidate forum, candidates for public office or their designees are welcome to appear on campus for non-campaign related activities, such as an educational lecture or informational talk to the university community. Such appearances must be sponsored by a university department or officially recognized Student Organization and satisfy the following criteria:

- A. The individual(s) is/are chosen to speak for reasons other than candidacy for public office;
- B. The individual speaks in a non-candidate capacity;
- C. The event format in coordination with the Events Office, Student Leadership & Programming, and/or the Office of Government and Community Affairs, and the publicity of the event is done in coordination with the Office of Marketing and Communications;
- D. No Campaign Activity occurs in connection with the event;
- E. Any such event will be open first to the entire university community (without preference based on political affiliation) and then, if space permits, may be open to the general public (without preference based on political affiliation); and
- F. The event meets any additional criteria appropriate for the particular event as determined by the Office of Government and Community Affairs.

### **3.5 Violation of Guidelines**

Failure to comply with this and related policies and guidelines could potentially subject individuals to disciplinary action, up to and including suspension, expulsion, or termination of employment or association with the university, in accordance with applicable university disciplinary procedures.



### Related Information

[Section 501\(c\)\(3\) of the Internal Revenue Code \(IRS\)](#)

[G. L. c. 268A and G. L. c. 268B of Massachusetts Law](#)

### History/Revision Information

**Responsible Office/Division:** Office of Government and Community Affairs

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