

## Guidance on Political, Campaign, and Lobbying Activity

Washington University is committed to the expression and discussion of ideas and opinions and encourages members of the University community to be informed, actively engaged citizens. The University itself is restricted by law in both what it can do to support individual candidates and how it can engage in lobbying activities<sup>1</sup>. This includes limits on the use of University resources.

The following guidance is meant to assist members of the University community in understanding restrictions on lobbying and campaign activity and requirements for hosting events on campus that involve elected officials or political candidates in either their campaign or official government capacities. Those wishing to engage in these or related activities are encouraged - and in some circumstances required - to contact the Office of Government & Community Relations (governmentrelations@wustl.edu, 314-935-5752) before such activities are undertaken or invitations are extended.

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## **Section I – Use of University Resources**

To comply with various laws and regulations, University services, resources, or funds cannot be used in any way to suggest University endorsement of – or support for – a political candidate, political party, or political action committee, or be used to engage in unapproved lobbying activities. No person or group may use Washington University's name, letterhead, logo, or seal for those purposes or to solicit funds for or otherwise support or oppose any such campaign or cause on behalf of the University. Examples of University resources include but are not limited to:

- The University's name, logo, or other identifying marks<sup>2</sup>
- University mail, office supplies, mailing lists, letterhead, photocopiers, telephones, email systems, computers, websites, databases, etc.

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<sup>1</sup> Washington University enjoys tax-exempt status under Section 501(c)(3) of the Internal Revenue Code and thus is prohibited from engaging in the campaign of any candidate or political party. Federal Election Commission regulations also restrict certain partisan activities. The University may engage and comment on issues critical to its tax-exempt purposes and on issues of public policy, including participation in referenda and ballot initiatives.

<sup>2</sup> For more information, please refer to <http://publicaffairs.wustl.edu/trademark-licensing/>

## **Section II – Private Political Activity and Candidacy**

### **A. Employee and Student Engagement on Political Issues**

This guidance should not discourage members of the Washington University community from communicating with their elected representatives or speaking out on political issues as private citizens. Students and employees should take care to indicate that their comments are personal views and do not represent those of the University, and that they are not speaking or acting on behalf of the University.

Though an employee may be identified by their University title, the employee's association with Washington University should be made only for purposes of identification. In addition, employees should only use personal email accounts (not wustl.edu accounts) and stationery for the distribution of political communications, campaign messages, petitions, and similar material.

### **B. Employee and student candidates for public office**

Employees and students seeking public office are strongly encouraged to meet with the Office of Government & Community Relations (governmentrelations@wustl.edu, 314-935-5752) regarding the appropriate use of University property and resources.

Employees should consult with their supervisor where they anticipate any campaign activities could take place during the employee's normal working hours or otherwise affect the employee's ability to carry out their normal employment obligations as outlined in the university employee handbook (<https://hr.wustl.edu/items/type/employee-handbook/>) and the faculty information handbook (<http://facultyinformationhandbook.wustl.edu>). The university expects the employee to assure strict compliance with applicable requirements outlined in federal, state, and municipal election regulations.

An employee or student seeking elective office shall not use any University resources, services, or personnel (while such personnel are on University time) for any campaign-related activities. (See [Section I.](#)) Additionally, the University's name may not be mentioned in the solicitation of contributions or other commitments, other than to identify the University as the employee's place of employment or the student's place of study. If an employee or student uses the University's name for identification purposes, the employee or student shall also make it clear that the University is not endorsing the employee or student, and that the employee or student's views are not necessarily those of the University.

An employee shall not seek financial contributions or request volunteer campaign assistance from other University employees who report, directly or indirectly, to the employee involved in the political activity. If an employee is a faculty member or instructor, the employee may not require campaign assistance or participation from students. In addition, if an employee is teaching a university course while seeking elective office, to avoid the conflict of interest, the employee may not request or solicit campaign assistance or participation from individual students in their course.

### **Section III – Voter Education, Civic Engagement Programs, and On-Campus Election Sites**

Members of the Washington University community are encouraged to be active and informed participants in the electoral process. The University is permitted to conduct certain non-partisan voter education activities, including public forums, voter registration, and voter training programs. Great care must be taken to ensure these kinds of activities remain non-partisan and comply with government guidelines. To ensure compliance, the University has adopted the following guidelines:

#### ***A. Voter Guides***

University resources can not be used to produce voter guides.

#### ***B. Voter Registration Activities***

All on-campus voter registration activities and civic engagement programs must be nonpartisan and approved and facilitated by the Gephardt Institute for Civic and Community Engagement.

#### ***C. On-Campus Polling Facilities***

The Office of Government & Community Relations works closely with campus and community partners to provide space for an on-campus polling facility during selected elections and to ensure those locations are in compliance with applicable local rules and regulations.

### **Section IV – Activities in Support of Candidates, Political Parties, or Petitions by Individuals and Student Groups**

Washington University encourages all members of the University community to be informed, actively engaged citizens. However, Washington University itself may not advocate for the election or defeat of a particular candidate or political party, or promote or encourage such advocacy by members of the audience at an event.

Therefore, University services, resources, or funds may not be used in any way that could appear to suggest University endorsement or support for a political candidate, political party, or political action committee. (See [Section I.](#)) University space may not be used to host a phone bank on behalf of a political candidate or party.

In addition, individuals whose actions could be reasonably attributable to the University should take great care that their personal political activities are not confused with actions undertaken on behalf of the University.

WU Students and employees engaging in personal political activities should be familiar with and conduct themselves in accordance with relevant University policies such as:

- the Demonstrations and Disruptions Policy (<https://wustl.edu/about/compliance-policies/governance/demonstrations-disruption/>);
- the University Solicitation and Distribution Policy found in the Employee Handbook (<https://hr.wustl.edu/items/type/employee-handbook/>); and,
- University and school advertising, publicity, and social media policies such as:
  - the Advertising and Promotions policy (<https://wustl.edu/about/compliance-policies/university-space-facilities/advertising-promotions/>);
  - University Social Media Policy(<https://wustl.edu/about/compliance-policies/media-policies/social-media-policy/>); and,
  - School of Medicine Social Media Guidelines (<https://medicine.wustl.edu/brand/social-media/>).

### ***A. Distribution of Campaign Literature and Soliciting Signatures on University Property***

Only students, faculty and staff may distribute campaign literature or solicit signatures for ballot petitions, campaigns, or similar political activities in WU campus areas where a School, Department, or unit allows students or employees to reserve tables or outdoor spaces. Individuals that are not Washington University students or employees are prohibited from such activity on University property. Such activities are allowed on public sidewalks.

Residential Life Policies and Procedures state that solicitation of any kind in the residential community is prohibited. Work areas – such as employee and department offices, conference rooms, reception areas, and labs – are similarly prohibited areas for collecting ballot petition signatures or distributing campaign literature.

University resources cannot be used to solicit signatures or produce and distribute campaign materials. Examples of university resources include, but are not limited to: University email systems and email addresses, mail, mailing lists, office supplies, letterhead, photocopiers, telephones, computers, websites, databases, office waiting areas, etc. (See [Section I.](#))

Students, faculty, and staff collecting signatures for initiative petitions to be placed on the Missouri ballot should be reminded that the Revised Statutes of Missouri, Chapter 116, Section 080, requires each petition circulator to be registered with the Missouri Secretary of State.

### ***B. Political Activity by Student Groups***

The University supports student efforts to become involved in the political process and campaign-related activities, both within the University community and off-campus. Although student groups may engage in partisan activity, student groups must make it clear both in their written materials and at their events that student group members speak as individuals and not on behalf of the University. When engaging in campus activities (such as painting the South 40 Underpass or reserving table space in the Danforth University Center or Farrell Learning and Teaching Center), students should follow University policies and procedures associated with all such activities.

### ***C. Political Activity Associated with Coursework***

University students may be asked to participate in political campaign-related activities as part of for-credit coursework only to the extent that such activities are genuinely aimed at educating students with respect to the electoral process, and no student is required to be active in a campaign for a candidate or cause which she or he does not support.

## **Section V – Hosting Government Officials and Staff, Candidates and Campaign Representatives, and Other Political Guests**

The University welcomes campus speakers representing a diverse range of views, beliefs, and governmental responsibilities. However, to ensure that the University can host a particular official, candidate, or political campaign representative in accordance with the guidance below, members of the University community must first contact the Office of Government & Community Relations (governmentrelations@wustl.edu, 314-935-5752) before extending an invitation.

Requests from government officials to visit campus should immediately be shared with the Office of Government & Community Relations so that the proper University leadership can be involved in hosting such a visit.

Additionally, University employees are often asked by their professional associations and outside organizations to invite elected officials and other government representatives to visit campus. Such requests must be approved by the Office of Government & Community Relations before an invitation is extended.

### ***A. Event Guidance***

A guest's appearance must constitute a speech, question and answer session, or similar communication in an academic setting, and must not be conducted as a campaign rally or event. The appearance or presentation shall not be used to collect campaign or other political contributions or commitments from members of the audience.

Admission to speaker appearances must be open to the University community and, if the sponsoring organization chooses (in compliance with other applicable University policies), the general public, without regard to the attendees' party affiliation or support of any particular candidate. Admission to events may not be controlled by speakers, campaign staff, or any other person or organization not affiliated with the University.

### ***B. Awards and Honors to Federal Officials***

Awards or other honors presented by any University unit or group to certain current federal officials are required to be disclosed to the government by Washington University in accordance with federal law. Any University unit or group considering the presentation of such an award must first receive approval from the Office of Government & Community Relations, the unit or group's managing Vice Chancellor or Dean, and the Chancellor.

### ***C. Media Guidance***

The Office of Public Affairs and Office of Medical Public Affairs coordinate media contact on behalf of the University and assist faculty, staff, and students with events. Registered groups

and individuals sponsoring events anticipating or seeking media coverage must contact the Office of Public Affairs in advance. The University may allow representatives of the news media to be present during an event or a speaker's appearance, but only if access is permitted in a politically neutral manner. Press conferences and other election-related media events managed by candidates and their campaign staffs are not permitted on University premises.

#### ***D. Facility Reservation and Rental***

University facilities may be used for events involving government officials and candidates in accordance with these guidelines. Many facilities are available for reservation and rental by members of the campus community. These spaces are subject to location-specific limitations and requirements, such as capacity limits, audio-visual availability and compatibility, photography restrictions, fees, and the serving of food and beverages.

Outside organizations may not rent university space for political or campaign purposes.

To ensure compliance, groups should follow the provisions outlined in these guidelines as well as applicable policies set forth through guidance provided by managers of campus reservable space such as:

- Campus Life/Event Management (<https://eventmanagement.wustl.edu/>)
- School of Medicine Facilities Management Department (<https://meet.wustl.edu/>)

Those wishing to reserve space are reminded that many locations are often in high demand throughout the year and limitations exist that make hosting certain speakers or events a challenge. Our campus lacks a large indoor arena-sized facility, and thus community members must ensure that planned events are appropriate for the size of the selected venue. In addition, the University cannot accommodate unexpected costs and changes that might need to be made at the last minute, such as the installation of specialized audio-visual equipment or additional security requirements.

#### ***E. Safety and Parking Guidance***

The Washington University Police Department and Washington University School of Medicine Protective Services coordinate with other local law enforcement and emergency services on behalf of the University to ensure the safety of the campus community and guests. In accordance with Danforth Campus Life/Event Management or School of Medicine Facilities Management policies, registered groups and individuals sponsoring events must contact WUPD and/or WUSM Protective Services in advance to approve the event and to discuss security, parking, and other related safety needs.

### **Section VI – University Lobbying and Positions on Issues of Public Policy**

Washington University is frequently approached to take a formal institutional position on issues of public policy (often presented as ballot initiatives, legislation, resolutions, regulations, ordinances, and executive orders to direct governmental/quasi-governmental action). Approval for such an official position is made only by the Chancellor and/or the Vice Chancellor for Government & Community Relations, following consultation with appropriate University leadership. Groups and individuals affiliated with the University are not authorized to take

institutional positions on public policy and should take care to clarify that any statements they make are not on behalf of the institution. For additional information, see the Protocol for Washington University Positions on Issues of Public Policy (<https://wustl.edu/about/compliance-policies/governance/protocol-positions-issues-public-policy/>)

The Chancellor, Executive Vice Chancellors, Vice Chancellors, and School Deans – in consultation with the Office of Government & Community Relations – are authorized to make lobbying contacts on behalf of the University. No other University employee is so authorized. The University retains outside lobbyists only through its Vice Chancellor for Government & Community Relations, with the consent of the Chancellor.

University faculty and employees are often asked by their professional associations to participate in lobbying activities. If you choose to engage in such activities, any lobbying activity on behalf of another organization is not part of your University employment. It is your responsibility to ensure that others understand you are acting as an individual or on behalf of a professional association, and that you are not acting on behalf of Washington University.

The University cannot and should not provide any financial support or resources – including but not limited to the use of personnel, email accounts, phones, copiers, office space or other University facilities – for unapproved lobbying activities. (See [Section I.](#))

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