

## GOVERNANCE AND LEGAL

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2014

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Supersedes:

Related Policies:  
**Policy on Endorsements  
and Use of University  
Identifiers**

Responsible  
Office/Department:  
**Office of Government  
Relations**

Keywords: **Political  
activity; political  
campaign; politics;  
fundraising; ballot  
initiatives; lobbying**

# Policy on Political Campaign- Related Activity

## I. Purpose and Scope

Northeastern University is committed to the free flow of ideas and opinions, and encourages its students, faculty and staff to vote and participate in civic discussions and the democratic process. As a tax-exempt, nonprofit institution, however, the university is prohibited under federal tax laws from direct involvement in the political process, and from using university resources to support or oppose a specific candidate for elective office or outcome on a political initiative. This policy addresses those prohibitions and their practical implications for faculty, staff, and students.

This policy applies to all students, faculty and staff, as well as to volunteers when acting or participating on behalf of the university. The policy and any guidelines published by the university regarding involvement in activities related to ballot initiatives and campaigns for public office are based upon IRS rulings concerning nonprofit corporations and other applicable judicial decisions and laws.

## II. Definitions

**For purposes of this policy,**

**Political Activity** means activity, including oral or written statements and financial support, that is directed toward the success or failure of a political party, candidate for election in a partisan political campaign for public office, a partisan political group or ballot initiative.

**Ballot Initiative**, also called, “ballot question,” “ballot measure,” “popular initiative,” “voter initiative,” “citizen initiative,” or just “initiative,” is a means by which a petition signed by a certain number of registered voters can bring about a public vote on a proposed statute or constitutional amendment.

**Political campaign** means a race between candidates for elective office, or other organized effort towards a particular election result, including for ballot initiatives.

**Lobbying** means influencing or intending to influence a Member of Congress or State or local Legislator or member of their staff.

**Fundraising** means soliciting contributions for political candidates, campaigns, or ballot initiatives.

**Endorsement** means public statements of opinion and/or contributions, monetary, in-kind, or otherwise, to political campaigns.

### **III. Policy**

It is the policy of the University not to intervene, through endorsement or otherwise, and not to participate, either directly or indirectly, in partisan political campaigns. When faculty and staff participate in political campaigns, that activity must be conducted in their personal capacity.

#### Use of University Facilities and Resources

Students, faculty, and staff may participate in political activities on their own time and without the use of university resources, such as phone, web pages, email, fax or mail. In addition, they may engage in nonpartisan activities, including training and/or educational programs, voter registration drives, and debates designed to increase public awareness and encourage participation in the electoral process. It also may be permissible to provide political candidates opportunities to speak at the university and/or to rent facilities for political events, provided these are on the same terms as those afforded nonpolitical events, within the university’s guidelines, and approved by

the Office of Government Relations; and the opportunity is made available to all candidates for that office under substantially similar terms and conditions.

Providing university resources, such as mailing lists, university letterhead, web pages, telephones, computers, copy machines, and office or other space, to a political candidate or cause is prohibited. Campaign endorsements, public statements of position, and/or contributions to political campaign funds made by or on behalf of the university are strictly prohibited. This includes, by way of example, the posting of signs on university property showing support for a particular candidate or initiative, the use of the name or seal of the university on materials intended to support a political candidate or initiative, and the inclusion of a university office/address as the return mailing address for the solicitation of campaign funds, or candidate or initiative endorsements. The university may not sponsor or host events to promote or advance the candidacy of a particular candidate or initiative. Fundraising for political candidates or initiatives may not be conducted in association with the university, and using university funds for campaign contributions, either in cash or to purchase campaign materials, is prohibited.

#### Students and Student Organizations

The Office of Student Affairs must be made aware of all student-based political activities on campus. In addition to this policy, Northeastern has policies and procedures relating to political rallies and demonstrations in the student handbooks. Northeastern is dedicated to preserving the rights of members of the university community to express their views and to protest, but all demonstrations must be peaceful, orderly, and abide by university procedures.

#### Faculty and Staff

University employees may participate in political campaigns of their choosing, off-hours, or on vacation time, so long as the activity is neither in the name of the university nor at the direction or requirement of a university official and does not use university resources. In addition, if a member of the faculty or staff wishes to seek public office, they must work with the Office of the General Counsel to determine if a plan can be developed for such activity that complies with university guidelines and applicable law.

#### Lobbying Rules

Under lobbying laws at both the state and federal levels, the university must document its lobbying activities. Therefore, faculty or staff who seek to lobby on behalf of the university must inform and coordinate with the Office of Government Relations. This

will assist the office to determine whether the activity is in the interest of Northeastern, and to support the faculty or staff member as needed, and the reporting of such activities. Members of the Northeastern community may lobby government officials regarding particular issues of personal interest to them on their own time and without the use of university name or resources.

#### **IV. Additional Information**

Neither this policy nor the attached guidelines address every specific situation that might arise. Members of the university community with any questions about their participation in political activities should consult with the Office of Student Affairs, the Office of General Counsel, or the Office of Governmental Relations.

Failure to comply with this policy can result in severe penalties to the institution, and to those who violate the policy.

#### **V. Contact Information**

Should you have questions about this policy please contact the Office of Student Affairs, 617-373-4384, the Office of General Counsel, 617-373-2157, or the Office of Government Relations, 617-373-8528.