

Guidance on Political, Campaign, and Lobbying Activity

<https://wustl.edu/about/compliance-policies/governance/political-campaign-lobbying-activity/>

Summary

Washington University is committed to the expression and discussion of ideas and opinions and encourages members of the University community to be active and engaged citizens. However, the University is required to remain politically neutral and cannot participate or intervene, directly or indirectly, in the campaign of any candidate or political party. Federal and state laws place limitations on political activity, lobbying activity, campaign activity, and other engagement with candidates, elected officials, and associated staff by employees of the University.¹

Because of these restrictions, the University's resources cannot be used in any way to suggest University endorsement of or support for a political candidate or political party, nor can they be used to engage in unapproved lobbying activities. Examples of University resources include but are not limited to:

- The University's name, logo, or other identifying marks
- University mail, office supplies, mailing lists, letterhead, photocopiers, telephones, email systems, computers, websites, databases, other information technology resources, etc.

Exceptions to these restrictions exist, generally dealing with non-partisan educational and voter registration activities. The University may engage and comment on issues critical to its tax-exempt purposes and on issues where it has a history of involvement, including participation in referenda and ballot initiatives. With the exception of those specifically authorized, University faculty, staff, and students are not permitted to lobby on behalf of the University.

Subject to certain limitations, candidates, government officials, associated campaign and government staff, and other political speakers may be invited to speak on campus. Members of the University community are encouraged to contact the Office of Government & Community Relations (935-5752) before such invitations are extended. A guest's appearance must constitute a speech, question and answer session, or similar communication in an academic setting. Such programs must be open to all members of the University community regardless of their political affiliation and may not be held in coordination with any campaign-related events or activity. The University reserves the right to impose any conditions or limitations upon the use of its facilities that it deems appropriate.

Employees should consult with their supervisor and be familiar with all relevant guidance and restrictions if considering public office where they anticipate their activities could affect their ability to carry out their normal employment obligations as outlined in the University Employee Handbook and the Faculty Information Handbook. Students and employees seeking public office are strongly encouraged to meet with the Office of Government & Community Relations regarding the appropriate use of University property and resources.

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¹ 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.

Guidance

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

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 marks²
- University mail, office supplies, mailing lists, letterhead, photocopiers, telephones, email systems, computers, websites, databases, other information technology resources, etc.

Section II – Private Political Activity

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 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.

Section III – Voter Education, Training, and Related 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 voter education activities, including public forums, voter registration, and voter training programs, as long as they are carried out in a non-partisan manner. On-campus voter registration activities are coordinated by the Gephardt Institute for Civic and Community Engagement.

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.

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

Section IV – Support for Candidates, Political Parties, or Petitions

The University 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. 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.

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](#))

Students, faculty and staff may distribute campaign literature or solicit signatures on University property for ballot petitions, campaigns, or similar political activities in accordance with:

- 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://wustl.edu/about/compliance-policies/human-resource-policies/>); 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/>).

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.

The University supports student efforts to become involved in the political process and campaign-related activities, both within the University community and off-campus. When engaging in campus activities (such as painting the South 40 Underpass or reserving space in the Danforth University Center or Farrell Learning and Teaching Center), students should follow University policies and procedures associated with all such requests.

Section V – Political Campaign Activity

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.

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

Employees should consult with their supervisor where they anticipate these 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://wustl.edu/about/compliance-policies/human-resource-policies/>) 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-candidate 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. If an employee uses the University's name for identification purposes in such a manner, the employee shall also make clear that the University is not endorsing the employee, and that the employee'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.

Section VI – Reserving and Utilizing University Space for Hosting Government Officials, Political Candidates, Voter Education, and Other Related Activities

University facilities may be used for events involving government officials and candidates, subject to some restrictions. Such programs must be open to all members of the University community regardless of their political affiliation and may not be held in coordination with any campaign-related event or activity.

During the academic year, the facilities of Washington University are primarily intended for the use of the Washington University community. During the summer, University facilities are more accessible to groups not affiliated with the University. The University reserves the right to impose any conditions or limitations upon the use of its facilities that it, in its sole discretion, deems appropriate.

Groups and individuals seeking to reserve University space are subject to location-specific requirements and limitations. 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 (<http://eventmanagement.wustl.edu/>)
- School of Medicine Facilities Management Department (<http://facilities.med.wustl.edu/operations/business-operations/myreservations/>)
- the Eric P. Newman Education Center (<http://epnec.wustl.edu/default.aspx>)

Those wishing to reserve space are reminded that many locations are often in high demand throughout the year and constraints and limitations exist that make accommodating certain speakers or events a challenge. Such events often impact the entire campus community. Our campus lacks a large indoor stadium-sized facility, and 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.

Certain facilities have specific restrictions such as capacity limits, sound amplification, photography restrictions, fees, and the serving of food and beverages. Registered groups and individuals sponsoring events must comply with these requirements, and should consult Campus Life/Event Management (<http://eventmanagement.wustl.edu/>), WUSM Facilities Management Department (<http://facilities.med.wustl.edu/operations/business-operations/myreservations/>), and/or the appropriate facility manager for details.

Section VII – 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 accommodate a particular official, candidate, or political campaign representative, members of the University community are encouraged to first contact the Office of Government & Community Relations (935-5752) before extending an invitation. Additionally, requests from government officials to visit campus should immediately be shared with the Office of Government & Community Relations.

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.

The Office of Public Affairs and Office of Medical Public Affairs coordinate media contact on behalf of the University and can assist faculty, staff, and students with events. Registered groups and individuals sponsoring events anticipating or seeking media coverage are responsible for contacting 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.

Section VIII – University Lobbying Activity

The Chancellor, Executive Vice Chancellors, Vice Chancellors, School Deans, and 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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