

## **SAINT MARY'S COLLEGE POLICY ON POLITICAL ACTIVITY**

Saint Mary's College encourages its students, faculty and staff to participate in national, state, and local political activities to prepare themselves for active lives as engaged citizens. While all students, faculty, and staff are free to express political opinions and engage in political activities, it is important that they avoid the appearance that they are speaking or acting for the college in political matters.

As a non-profit, private institution of higher education whose activities are regulated in part by Section 501(c)(3) of the Internal Revenue Code, Saint Mary's College may not participate or intervene in the political campaign of any candidate for public office. Federal Elections Commission regulations also prohibit Saint Mary's College from facilitating the making of contributions or funding communications that influence, or are intended to influence, the outcome of federal elections. Nevertheless, every individual has the right to organize and to join political associations and to advocate and publicize political opinions.

College facilities and funds may be used by political groups on campus so long as the use does not favor one political party over another. Student activities funds may not be used for direct political action, for disbursement to any organization that is not an officially recognized Saint Mary's College organization or contributed to a political campaign or other political fund or organization. Student organizations that use College facilities for political presentations must open such presentations to all members of the campus community. No campaign political rallies may be held on campus.

Permissible activities include (but are not limited to):

- Conducting training programs designed to increase public understanding of the electoral process.
- Annually preparing and distributing a compilation of voting records on major legislative issues that involve a wide range of topics, without political skew and without editorial opinion.
- Circulating unbiased questionnaires to all candidates for office, and tabulating and disseminating the results; provided the questionnaires cover a broad range of subjects and neither reflect political skew nor contain editorial opinion.
- Conducting public opinion polls with respect to issues (rather than candidates), provided the questions are fair and neutral and accepted polling techniques are used.
- Participating in non-partisan voter registration activities.
- Providing access to air time on SMC-TV on an equal basis to all legally qualified candidates for public office.
- Providing opportunities to speak at college events on an equal basis to all legally qualified candidates for public office. An explicit statement should be made as part of the introduction of the speaker and in communications concerning the speaker's attendance that the institution does not support or oppose the candidate. Campus fundraising at the event is prohibited. The institution must make reasonable efforts to

ensure that the appearances constitute speeches, Q and A sessions, or similar activities in an academic setting and are not conducted as campaign rallies or events.

- Conducting institution sponsored public forums to which all legally qualified candidates for public office are invited and given equal access and opportunity to speak.
- Inviting candidates to appear in a non-candidate capacity, provided that the individual is chosen to speak solely for reasons other than his or her candidacy. No reference to candidacy for office or the election can be made and campaigning is prohibited.
- Establishing genuine curricular activities aimed at educating students with respect to the political process. An example of this is available.
- Rearranging the academic calendar to permit students, faculty, staff and administration to participate in the election process, if the rearranging is done without reference to particular campaigns or political issues.
- Providing financial and administrative support to the student newspaper even though the newspaper published editorial opinions on political and legislative matters.
- Allowing established student groups to use institutional facilities for partisan political purposes, provided that such groups pay the usual and normal charge, if any, for use of institutional facilities by student groups. Administrators and faculty must take special care in relation to any such proposed student activity, to avoid the appearance of institutional endorsement.
- Adopting a voluntary payroll deduction plan that would allow individual employees to direct a portion of their wages to political action committees (PACs) for unions.
- Members of the college community are entitled to participate or not, off-hours, as they see fit, in the election process provided that speaking or acting in the name of the institution is prohibited.
- A faculty member, administrator or other employee may, if permitted by institutional policies and procedures, engage in federal campaign related activity that is:
  - Outside normal work hours;
  - Within ordinary work hours if the time is made up with-in a reasonable period;
  - Charged to vacation time;
  - During a leave of absence taken without pay.
- Senior institutional officials such as the president or vice presidents should ordinarily refrain from campaign activity as there is risk that such activity would be perceived as support or endorsement by the institution.
- Public statements, oral or written, by institutional officials (such as the president, vice presidents and deans) in support of a candidate, political party, PAC or the like, where the institutional officer clearly indicates that his or her comments are personal and not intended to represent the views of the institution.

Non-permissible activities include (but are not limited to):

- Conducting “voter education” activities, such as those involving questionnaires that are confined to a narrow range of issues or skewed in favor of certain candidates or a political party.
- Publishing ratings of candidates, particularly in situations where the ratings could be viewed as reflecting the views of the institution or use of institutional resources in preparing and publishing ratings.
- Endorsing, expressly or implied, a candidate for public office. Examples include placement of signs on college property that support a particular candidate or using college funds to contribute to a political campaign fund. Public statements at college events by an official of the college praising a particular candidate in relation to holding public office.
- Commenting on specific actions, statements or positions taken by candidates including incumbents, in the course of their campaign.
- Promoting action (voting) with respect to issues that have become highly identified as dividing lines between candidates.
- Coordinating voter education activities with campaign events.
- Coordinating institutional fundraising for a particular candidate for public office, political party or PAC.
- Reimbursing college officials for campaign contributions.
- Providing mailing lists, use of office space, telephones, photocopying or other institutional facilities or support to a candidate, campaign, political party or PAC.
- Using institutional letterhead in support of a candidate, political party or PAC.
- Sponsoring events to advance the candidacy of particular candidates.
- Using message boards or forums affiliated with the institution’s website to support particular candidates.
- Providing hyperlinks to the web pages, or other space on the college’s website, of one or more candidates for public office in a manner that favors one candidate over another.
- Providing a candidate a forum to promote his or her campaign if other candidates are not treated equally, even if the forum is not intended to assist the candidate.
- Public statements, oral or written, by institutional officials (such as the president, vice presidents and deans) in support of a candidate, political party, or PAC where there is risk that the statements would be perceived as support or endorsement by the institution.
- Remarks at an institutional meeting by an institutional official in support of a candidate, political party, or PAC.

The lists above are taken from the American Council on Education (ACE) *Political Campaign-Related Activities of and at Colleges and Universities*. Additionally, Saint Mary’s College does not permit filming for political campaign purposes on campus or in its facilities.

Endorsed by the President’s Cabinet-7/17/2012