



OFFICE OF COMPLIANCE SERVICES
UVM.EDU/POLICIES

POLICY

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Title: Political Engagement, Advocacy, and Campaign Related Activities - Interim

Policy Statement

The primary purpose of the University is to create and share knowledge. Toward that end, the University promotes discussion of important issues in society, including the free expression and exchange of political viewpoints and ideas. The University will support and protect the freedoms of speech, expression, petition, peaceable assembly, and association. The University encourages its students, faculty and staff to exercise fully the rights of citizenship, including participation in the political life of their communities, the state, and the nation, and to educate and involve themselves in world affairs.

Concurrently, the University must comply with Internal Revenue Service (IRS) Regulations that prohibit the use of University resources in connection with political campaign activities in support of, or in opposition to, candidates, as well as limit the extent to which the University may seek to influence legislation (commonly referred to as "lobbying"). Therefore, the University shall not, through its officials or units, participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for public office. Furthermore, lobbying activity undertaken by the University shall not represent a substantial part of its activities.

The University has designated the Office of University Relations as primary contact for all elected officials and political candidates. University employees and governance groups who plan to contact elected officials or political candidates on behalf of the University, or while engaged in University business, must obtain advance permission from the Office of University Relations. Similarly, invitations to, or requests by, elected officials or political candidates to participate in University events or utilize University facilities must be processed through University Relations.

Nothing in this Policy is intended to limit the rights of students, faculty or staff to express personal opinions or to engage in political activity in their individual capacities and as private citizens, provided they indicate clearly that they are not representing the University, or speaking for, or on behalf of, the University.

Reason for the Policy

The purpose of this Policy is to establish guidelines and approval procedures for the conduct of political engagement, advocacy, and campaign related activities by the University and in University facilities, in compliance with federal law governing tax-exempt organizations.

Applicability of the Policy

This Policy applies to all University students, faculty and staff, and all University services, activities, operations, and facilities.

Definitions

- Advocacy:** Any effort to influence public policy through education, demonstration, or lobbying; an action directed at changing the policies, positions, or programs of public policy makers.
- Campaign related activity:** An event at which a political candidate or political organization speaks or is prominently featured. Any event that has the purpose or primary effect of promoting or opposing a particular political candidate.
- Governance Group:** Organizations that have official University functions and responsibilities, including, but not limited to, the Faculty Senate, Staff Council, Student Government Association, Graduate Student Senate, Inter-Residence Association, Inter-Fraternity Council, and Pan-Hellenic Council, are deemed to be administrative units of the University for purposes of this Policy.
- Legislation:** Action by Congress, any state legislature, any local council, or similar governing body, with respect to acts, bills, resolutions, or similar items (such as legislative confirmation of appointive office), or by the public in referendum, ballot initiative, constitutional amendment, or similar procedure. It does not include actions by executive, judicial, or administrative bodies.
- Lobbying:** Any effort to influence legislation.
- Non-Partisan:** activities that provide equal access and do not favor or oppose a particular candidate, party or viewpoint.
- Political candidate:** A person who has publicly announced an intention to be a candidate for a public office (national, state, local or political party office) or is being promoted publicly to join a race and become an official candidate. An incumbent public official is not a political candidate until they have publicly announced an intention to run for reelection or another public office. Individuals being considered for appointed office are excluded from this definition.
- Political engagement:** An overarching term that refers to interaction with political candidates and organizations, as well as elected and public officials.
- Political fundraising:** The solicitation or collection of money, or pledges of money, for a political candidate or organization. The sale of a candidate's books, campaign souvenirs, or other merchandise does not constitute fundraising by a University-recognized organization, provided the price charged does not exceed its retail value and the proceeds are not contributed, directly or indirectly, to a political candidate or organization.
- Political organization:** A political campaign organization, political party, political action committee, so-called "section 527 organization," or similar organization that supports a political candidate or the views of a political candidate.

University-recognized organization: An organization approved under the terms of the University's Group and Organization Recognition Policy. For purposes of this Policy, and in compliance with IRS regulations, organizations with separate legal/tax status, including, but not limited to, certified labor unions and University Affiliated Organizations, shall be excluded from this definition.

Procedures

I. Coordination with University Relations

The Office of University Relations coordinates all University contacts with public officials and candidates for political office, including University lobbying and advocacy activities.

1. University employees and students who plan to contact elected officials or political candidates on behalf of the University, a University Recognized Organization, or while engaged in University business, must obtain advance permission from the Office of University Relations.
2. University employees and students who wish to invite elected officials or political candidates to participate in University events, must do so through University Relations.
3. All requests from public officials or political candidates to use University facilities must be referred to the Office of University Relations for review and response.
4. The Office of University Relations is the sole office that may retain an external lobbyist or lobbying firm on behalf of the University.

University Relations can be contacted by using the form "Before a Political Visit" ([hyperlink forthcoming](#)) or by emailing the Director of Federal and State Relations.

Any University employee or student who has had contact with a government official or political candidate on behalf of the University, a University Recognized Organization, or while engaged in University business without consulting University Relations must report their activity immediately. *Click here to complete our disclosure form* ([hyperlink forthcoming](#))

II. Personal Interaction with Elected Officials and Political Candidates

The University encourages its faculty, staff, and students to be engaged citizens in our democracy. Individuals are free to contact elected officials and political candidates with issues of concern to themselves, provided they specify they are acting in their capacity as private citizens, and are not representing the University or otherwise engaged in University business.

University employees and students are prohibited from using institutional resources, such as, but not limited to, paid work-time, funds, vehicles, telephone, duplicating equipment, e-mail, intercampus mail, mailing lists, or other supplies for personal political purposes. In addition, they may not use the University seal, letterhead, symbols, or other proprietary marks of institutional affiliation to endorse or oppose political parties, campaigns, or candidates. For further details, refer to the University's Policies on the Use of Campus Mail and Letterboxes and Computer, Communication and Network Technology Acceptable Use.

III. Personal Political Engagement in the Workplace

Employees may not engage in the promotion of, or opposition to, any political organization, candidate, or cause during regular working hours. Leave time must be used. Employees and governance group leaders, in the scope of their role, may not engage in political activity that is disruptive to the workplace, University operations, or interferes with the University's educational mission. Employees and governance group leaders must avoid the promotion of, or opposition to, any particular political organization, candidate, or cause in fulfilling their institutional responsibilities.

Political Appointments or Elective Office. Administrators, faculty and staff may accept political appointments or elective office in accordance with otherwise applicable University policies regarding conflicts of commitment or interest and leaves of absence.

Persons Employed in Federally-Aided Programs. Faculty and staff employed in federally-aided programs may be subject to the federal Hatch Political Activities Act. Those persons should consult with the Office of University Relations regarding their associated obligations.

IV. Campaign Related Activity on Campus

There are three general categories of campaign related activities covered by this policy based on the type of organization sponsoring the event:

1. Sponsored By the University

- a) **Participation and Sponsorship.** Although the University is a public, tax-exempt institution and therefore is not permitted to endorse any political philosophy or any candidate for public office, it will provide opportunities to educate its students, faculty, staff, and citizens at large through candidate lectures, forums, debates and other political discourse on campus. As detailed below, the University may sponsor certain campaign related activities so long as they comply with the terms of this Policy and the Facilities and Grounds Use Policy.
- b) **Approval.** Campaign related activities may be sponsored by a college, school, center, academic department, administrative unit, or governance group of the University. Sponsorship of the event must be approved by the applicable dean, director, or vice president charged with oversight of the sponsoring unit, as well as the Vice President for Operations and Public Safety or their designee. Campus facilities will be made available for events in accordance with the Facilities and Grounds Use Policy and any associated guidelines. The Vice President for Operations and Public Safety, or their designee, has final authority to approve or disapprove the use of University facilities for campaign related activities and should be included in the planning process for all political events sponsored by the University.
- c) **Format.** University-sponsored campaign related activity may be in the format of a candidate forum or debate in which all legally qualified candidates for a political office are invited to participate. Receptions and other social activities associated with the activity must also include all candidates who were invited to participate. Alternatively, the University may invite a candidate to speak individually provided that the University takes steps to ensure that all legally qualified candidates for that office are invited to speak at a similar event sponsored by the University, and none is favored in relation to the activity. Separate and apart from campaign related activity, only non-partisan voter registration activities may be sponsored by the University.
- d) **Disclaimer Statement.** At the beginning of each event, after the event is fully convened, the sponsoring University unit must effectively communicate the following disclaimer:

“This event is sponsored by _____. The use of the University of Vermont’s facilities for this event does not constitute an endorsement by the University. The University of Vermont does not endorse these candidates or organizations or any other candidates or organizations in connection with this or any other political campaign or election.”
- e) **Publicity.** Promotional material may not state or imply that the University, any unit, or any institutional official endorses a political candidate or political organization or any position of a political candidate or political organization. Subject to this restriction, the University may

otherwise publicize the event in any manner it deems appropriate and may arrange for coverage by media organizations, including campus media.

- f) **Costs, Expenses, Fees and Honoraria.** Facilities rental charges will be waived in accordance with the Facilities and Grounds Use Policy, but the institutional sponsor must pay all service costs associated with the event, including, without limitation, event coordination and service fees. No compensation, honorarium, or expenses may be paid to any political candidate or political organization and no admission fee may be charged. No political fundraising activities may take place at, or in connection with University sponsored campaign related activities.

2. Sponsored By Recognized Groups and Organizations

- a) **Participation and Sponsorship.** Organizations are encouraged to help educate and inform the campus community about upcoming elections, including urging individuals to exercise their right to vote. While the University encourages non-partisan, educational dialogue, organizations, consistent with the rights of its individual members, are free to express their collective views about political parties, candidates, and issues, and to sponsor events in support of or in opposition to the same, so long as they comply with the terms of this Policy and the Facilities and Grounds Use Policy.
- b) **Approval.** Campaign related activities may be sponsored by a University-recognized student, faculty, or staff group or organization. The sponsorship must be approved by the organization's president, and the Vice President for Operations and Public Safety must be notified prior to reserving campus facilities for the event. Campus facilities will be made available in accordance with the Facilities and Grounds Use Policy and any associated guidelines. The Vice President for Operations and Public Safety, or their designee, has final authority to approve or disapprove the use of University facilities for any campaign related activity.
- c) **Publicity.** Promotional material may not state or imply that the University endorses the political candidate or political organization or any position of the candidate or organization. The sponsoring organization may limit the extent of media coverage of the event, subject to the University's right to publicize the event in any manner it deems appropriate.
- d) **Format.** University-recognized groups and organizations are permitted to invite candidates to campus for the purpose of educating the University community. Candidate speeches on a given topic, question-and-answer sessions, or similar communications are appropriate. However, events in the form of a campaign rally or fundraising event on behalf of a candidate are not permitted. Events may not be controlled by candidates or campaign staff. To the extent recognized groups wish to engage in voter registration activities, separate and apart from political events, they are encouraged to do so, provided it is made clear they are not acting on behalf of the University. Canvassing activities and voter registration drives on campus are necessarily and strictly limited to reserved tables and public spaces in accordance with the University's Solicitation Policy.
- e) **Disclaimer Statement.** At the beginning of each event, after the event is fully convened, the political candidate or a representative of the political candidate, the political organization, or the sponsoring group or organization must effectively communicate the following disclaimer:

"This event is sponsored by _____. The use of the University of Vermont's facilities for this event does not constitute an endorsement by the University. The University of Vermont does not endorse this candidate or organization or any other candidate or organization in connection with this or any other political campaign or election."

- f) **Costs, Expenses, Fees and Honoraria.** Facilities rental charges will be assessed in accordance with the University's Facilities and Grounds Use Policy, and the sponsoring organization must pay all service costs associated with the event, including, without limitation, event coordination and service fees. No compensation, honorarium, or expenses may be paid to any political candidate or political organization by a University-recognized group or organization. The sponsoring group may charge admission only in an amount necessary to cover reasonable costs of the event. No political fundraising activities may take place at, or in connection with, an event held under this section. No University derived funding may be used to conduct political activities or to make political contributions.

3. Candidate, Campaign or Private Use of University Facilities

- a) **Participation and Sponsorship.** The University, through University Event Services, regularly permits the rental of University facilities for private events at fair market value. In the case of campaign related activities, the University will make its facilities available for rent to candidates, campaigns and other interested parties on an equal basis in accordance with established University Policy and subject to availability.
- b) **Approval.** Campus facilities will be made available to candidates, campaigns and other interested parties for campaign related activities in accordance with this Policy and the Facilities and Grounds Use Policy and any associated guidelines. The Vice President for Operations and Public Safety, or their designee, has final authority to approve or disapprove the use of University facilities for any event, and must be notified of all requests for use of campus facilities prior to University Event Services confirming space.
- c) **Publicity.** Promotional material may not state or imply that the University endorses the political candidate or political organization, or any position of the candidate or organization. Requests for press conferences or similar events on campus by, or on behalf of, political candidates or their campaigns are subject to this Policy.
- d) **Format.** The structural format of campaign related activities held in University facilities by a Candidate, Campaign, or other interested party is in that group's discretion, and they remain fully responsible for their own compliance with IRS Regulations and other sources of law which may apply to the conduct of political activities. The University is acting purely as an arms-length lessor of space.
- e) **Canvassing.** The University does not permit any candidate, campaign, or other interested party to engage in solicitation, campaigning, or other door-to-door canvassing activities in staff or faculty offices, student residence halls, or other private work or living areas. Canvassing activities are necessarily limited to publicly accessible areas consistent with the University's [Posting and Solicitation Policy](#).
- f) **Disclaimer Statement.** At the beginning of each event, after the event is fully convened, the political candidate or a representative of the political candidate or the political organization must effectively communicate the following disclaimer:

"This event is sponsored by _____. The use of the University of Vermont's facilities for this event does not constitute an endorsement by the University. The University of Vermont does not endorse this candidate or organization or any other candidate or organization in connection with this or any other political campaign or election."
- g) **Costs, Expenses, Fees and Honoraria.** The political candidate or organization must pay the full facility rental charge in accordance with the Facilities and Grounds Use Policy, and must pay all

service costs associated with the event, including, without limitation, event coordination and service fees. The political candidate or organization may establish and charge admission for their event. All facility rental charges and the estimated services costs must be paid in full in advance of the event.

For illustrative examples and further guidance, please visit the [University Relations website](#) for a list of Frequently Asked Questions.

Contacts

Questions concerning the daily operational interpretation of this policy should be directed to the following (in accordance with the policy elaboration and procedures):	
Title(s)/Department(s):	Contact Information:
University Relations	Phone: (802) 656-5690 Website: https://www.uvm.edu/urel

Forms/Flowcharts/Diagrams

- None

Related Documents/Policies

- [Affiliated Organizations](#)
- [Computer, Communication, and Network Technology Acceptable Use](#)
- [Facilities and Grounds Use](#)
- [Free Expression; Campus Speakers; Response to Disruption Policy](#)
- [Group and Organization Recognition](#)
- [Posting and Solicitation Policy](#)
- [University Name, Symbols, Letterhead, and other Proprietary Indicia of Affiliation](#)
- [Use of Campus Mail and Letterboxes](#)

Regulatory References/Citations

- None

Training/Education

Training will be provided on an as-needed basis as determined by the Approval Authority or the Responsible Official.

About this Policy

Responsible Official:	President	Approval Authority:	President
Policy Number:	V. 1.9.1	Effective Date:	August 13, 2020
Revision History:	<ul style="list-style-type: none"> • V. 6.0.1.1 approved April 5, 2006 • V. 6.0.1.2 approved September 13, 2008 • V. 6.0.1.3 approved March 28, 2012 • V. 5.22.4/V. 6.0.1.4 approved May 15, 2012 • V. 5.22.5 effective January 20, 2015 		

	<ul style="list-style-type: none">• Responsible official officially changed from the Vice President for Legal Affairs and General Counsel to the President on October 5, 2020
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