



## Policy on Political Campaign Activities

### Policy Statement

It is the policy of Seattle University to comply with Internal Revenue Service (IRS) regulations that prohibit the use of University resources in connection with political campaign activities on behalf of, or in opposition to, any candidate for public office or any ballot initiative.

### Purpose of Policy on Political Campaign Activities

This policy complies with IRS regulations which prohibit participation in political activities and to protect the University from imposition of excise tax, penalties, or revocation of tax-exempt status.

### Procedures and Guidelines

The Internal Revenue Code prohibits Seattle University, as a tax-exempt organization under Section 501(c)(3), from participating or intervening in any political campaign on behalf of, or in opposition to, any candidate for public office or any ballot initiative.

- Political intervention includes not only making financial contributions but also the publication or distribution of written or oral statements on behalf of or in opposition to a particular candidate or ballot initiative.
- There are no exceptions to this prohibition.
- Even an insubstantial violation may lead to monetary fines or expose the University to revocation of its tax-exempt status.

Nevertheless, Seattle University encourages its members to engage in civic activity, including participation in the political process. To permit the most robust discourse during partisan political campaigns, while at the same time ensuring Seattle University's compliance with the restrictions placed on the University as a tax-exempt organization, the University offers the following guidelines. Members of the University community should observe the following with respect to their participation in national, state or local partisan political campaign activities.

- 1. Prohibited Political Activities.** Faculty, staff, Trustees and volunteers are prohibited from using University resources to engage in political activities in support of, or in opposition to, a political candidate or ballot initiative. Although not an exhaustive list, the following are examples of prohibited political activities:

- Using a University-provided e-mail address to campaign for or against a ballot initiative or candidate running for elected office.
- Using a University office or University employee office as a return mailing address for the solicitation of funds for a campaign for or against a ballot initiative or candidate running for elected office.
- Using University letterhead, logos or postage to send mail supporting or opposing a ballot initiative or candidate running for elected office.
- Using a University copy machine to copy materials supporting or opposing a ballot initiative or candidate.

- However, use of pay-per-use services, such as SuperCopy may be used as long as University funds are not used.
  - Conducting a political campaign from a University office or other University facility, or otherwise using University resources, such as a University-provided telephone, computer or e-mail address to conduct such a political campaign.
  - Using a University employment title or position to support or oppose a political candidate or ballot initiative—such information should only be used for identification and not as a sign of University endorsement.
  - Using University funds to reimburse individuals for political donations.
  - Wearing campaign t-shirts or buttons to work, meetings or events where you are associated with your work role or the University.
  - Affixing posters, election articles or campaign materials in your office space.
  - Using University social media to like, friend, or tweet material from or about a candidate or ballot initiative.
- 2. Permitted Political Activities.** Faculty and staff may engage in political activities during their own personal time and with their own personal resources. Members of the University community are free to become involved in the election process as they choose, so long as they do so in a way that does not, in either an overt or implied manner, involve the University or its resources. Those engaging in political campaigns in their individual capacity must clearly and unambiguously indicate that their actions and statements are their own and not those of the University.
- 3. On-Campus Appearances by Political Candidates.** As part of its educational mission, the University welcomes political candidates to campus to represent a diverse range of views. On-campus political forums or debates are permitted as part of the University’s educational mission, provided that the forum or debate does not favor or endorse any particular candidate and it complies with the following IRS test:
- The forum or debate should include all legally qualified candidates for the contested office.
  - The forum or debate topics should cover a broad range of issues, including those issues of importance to the organization sponsoring the forum.
  - The questions presented to the candidates should be prepared by an independent, nonpartisan group. Such a group could include University faculty, staff and students, the media, and community leaders. Candidates should not be asked whether they agree or disagree with positions, agendas, platforms, or statements of the University.
  - A moderator should be selected by the University, and his or her role should be limited to ensuring that the forum ground rules are followed. The moderator should refrain from commenting on the candidates’ statements in a way that demonstrates approval or disapproval of their ideas.
  - A disclaimer must be included in all written materials and advertising and announced at the beginning of the event: “Seattle University does not support or oppose any political candidates. The views expressed are those of [the candidate or other partisan political speaker] only. The [Seattle University-related group] is sponsoring this event.”
  - Each candidate should have the same opportunity to present his or her view on the issues discussed.

In addition, no campaign rallies, campaign banners, campaign literature or button distribution or fund-raising are allowed at the event.

Political candidates are also permitted to appear on-campus in a non-campaign capacity as long as the event is sponsored by a University department or an officially recognized organization. The event must adhere to the following guidelines:

- The political candidate is invited to speak for reasons other than his or her candidacy for public office.
- The political candidate speaks in a non-candidate capacity.
- The event maintains a non-partisan atmosphere and prohibits campaigning or fundraising.
- The University department or organization takes care to avoid the appearance of institutional endorsement for a particular candidate.
- The event is open to the entire University community, regardless of political affiliation.
- The event is not organized or run by the candidate, his or her representatives or any outside organization.

For all proposed on-campus events involving political candidates, the event organizers are required to timely coordinate with Conference and Event Services, provide all requested information and documents needed for the University to review the event and comply with all University policies and procedures.

- 4. Student Publications.** Student publications may run editorials expressing the editor's views on candidates for public office, provided that the publication's editorial policy is free of editorial control by University administrators or faculty advisors. A statement on the editorial page must indicate that the views expressed are those of the student editors and not those of the University.
- 5. Advertising in University Publications.** University publications may accept paid political advertising as long as it is accepted on the same basis as other non-political advertising and not attributed to the University's own views. The publication should identify the advertisement as paid political advertising and state that the University does not endorse the candidate. The University must make advertising space available to all candidates on an equal basis.

**Questions?** Please keep in mind that these guidelines do not address every situation. If you have any questions about permitted and prohibited political activities, please contact the Office of the University Counsel at (206) 296-2043. Your cooperation is both necessary and appreciated.