

TEMPLE UNIVERSITY

POLICIES AND PROCEDURES MANUAL

Title: Political Campaign Activities
Policy Number: 07.50.01
Issuing Authority: Office of the President
Responsible Officer: Chief Compliance Officer

Date Created: June 30, 2011
Date Last Amended/Reviewed: August 2024
Date Scheduled for Review: May 2027
Reviewing Office: University Counsel; Ethics & Compliance

Purpose

The primary purpose of the university is to create and share knowledge. Toward that end, the university promotes research into and discussion of important issues in society inside and outside of the classroom, including the free expression and exchange of political viewpoints and ideas. The university also 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. 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, nor does it aim to restrict the pursuit of knowledge. At the same time, the university, as a tax-exempt institution, is prohibited by federal laws and regulations from engaging in certain types of political activities, and certain types of politically-related involvement by university employees may be incompatible with the individual's employment responsibilities.

Definitions

Partisan: Describing something that is directed toward the success or failure of a political party, candidate, political campaign, or political group whose primary purpose is to promote the success or failure of a political party, candidate, or political campaign.

Political Candidate: A person who has publicly announced an intention and taken necessary steps to be a candidate for election to any public 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 she/he has publicly announced an intention to run for reelection or another public office.

Political Event: An event at which a Political Candidate or Political Organization speaks or is prominently featured, and includes any event that has the purpose or primary effect of promoting the election of a particular Political Candidate. A classroom presentation by a Political Candidate or Political Organization at the request of the instructor of a credit or non-credit course of the university is not a Political Event if the speaker is chosen solely for reasons other than candidacy for public office.

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.

Sponsor: A university college, school, center, academic department, administrative unit, or University-Recognized Organization.

University-Recognized Organization: An organization sanctioned by resolution of the Board of Trustees, approved by the president or treasurer, granted recognition as a matter of law (e.g. unions certified as employee representatives by the Pennsylvania Labor Relations Board), or recognized by the Division of Student Affairs.

Policy Statement

University employees and representatives, when acting in their official capacities for the university, are prohibited from participating or intervening, directly or indirectly, in any political campaign on behalf of, or in opposition to, any Political Candidate.

Participation or intervention in a political campaign includes any and all activities that favor or oppose a candidate. For example, university employees and representatives, when acting in their official capacities for the university, are not permitted to make or distribute public statements in support of, or in opposition to, a candidate for elected public office, or to solicit or make a contribution or cause others to make contributions to a political campaign.

If a university employee or representative participates or intervenes in a political campaign in her/his capacity as a private citizen, such employee or representative must indicate clearly that she/he is expressing a personal view and is not representing the university or speaking for, or on behalf of, the university.

University resources, including without limitation facilities, funds and other assets (including university publications in any and all media) may not be used for political campaign activities of any kind, except as specified in this policy. Similarly, Students and University-Recognized Student Organizations are also prohibited from using appropriations from the University General Activity Fees to contribute to a political campaign.

I. Political Events

1. Political Events Sponsored by the University

a. *Participation and Sponsorship.* The university shall not endorse any Political Candidate. The university may provide opportunities to educate its students, faculty, staff, and community on the election process through lectures, forums, debates and other political discourse. As detailed below, the university may, as an institution or through its academic or administrative units, sponsor certain Political Events, subject to the following terms and conditions.

b. Institutional Event Procedures.

- i. Approval. A Political Event may be sponsored by a college, school, center, academic department, or administrative unit of the university. Sponsorship must be approved in advance by the university officer designated by the president as responsible for political activities. The Sponsor must also inform the Office of Government Affairs and Civic Engagement in advance of the proposed Political Event. A university-sponsored Political Event must be in the format of a candidate forum or debate in which all Political Candidates for a particular office are invited to participate on an equal basis. University facilities will be made available for such events in accordance with this and other applicable university policies. Receptions and other social activities associated with the event must include all candidates who were invited to participate in the Political Event.
- ii. Publicity. All promotional material for Political Events must include appropriate statements indicating that the university, the unit sponsoring the event, and university officials do not endorse any Political Candidate or Political Organization or any position of a Political Candidate or Political Organization. Subject to this restriction, university officers may otherwise publicize the event in any appropriate manner and may encourage or arrange for coverage by media organizations, including university media.

iii. Costs, Expenses, Fees and Honoraria. Subject to prior written approval by the senior university officer with responsibility for political activities, facilities use charges for a university-sponsored Political Event may be waived for facilities managed directly by the university (but excluding, for example, the Liacouras Center, which is managed by an independent contractor and does not fall within the ambit of this policy), but the institutional sponsor must pay all ancillary service costs associated with the event, including, without limitation, security, custodial, parking, audio-visual equipment set-up and operation, and the like. No compensation, honorarium, or expenses may be paid to any Political Candidate or Political Organization, no admission fee may be charged, and no political fundraising activities may be conducted.

c. Disclaimer. At the beginning of any Political Event, after the event is fully convened, the Political Candidate or a representative of the Political Candidate, the Political Organization, or the sponsoring student organization must deliver the following spoken disclaimer: “This event is sponsored by_____. The use of Temple University’s facilities for this event does not constitute an endorsement by the university. Temple University does not endorse this or any candidate or organization or any position of this or any candidate or organization in connection with this or any other political campaign or election.”

2. Political Events Sponsored by University-Recognized Student Organizations.

Event Sponsorship and Procedures:

a. Approval. A Political Event may be sponsored by a university-recognized student organization in accordance with the policies and procedures established by the Division of Student Affairs for student-sponsored events in general. Sponsored events that use university facilities or allocations must be approved by the Student organization’s president, as well as the cognizant official in the Division of Student Affairs and the senior university officer with responsibility for political activities. The student organization hosting the event must also notify the Office of Government Affairs and Civic Engagement in advance of the proposed Political Event. University facilities may be made available for such events in accordance with this and other applicable university policies.

- b. **Publicity.** All promotional material for Political Events must include appropriate statements indicating that the university, the student organization hosting the event and university officials do not endorse any Political Candidate or Political Organization or any position of a Political Candidate or Political Organization. Subject to this restriction, student organizations may otherwise publicize the event in any appropriate manner and may encourage or arrange for coverage by media organizations, including university media.
- c. **Disclaimer.** At the beginning of any Political Event, after the event is fully convened, the Political Candidate or a representative of the Political Candidate, the Political Organization, or the sponsoring student organization must deliver the following spoken disclaimer: “This event is sponsored by_____. The use of Temple University’s facilities for this event does not constitute an endorsement by the university. Temple University does not endorse this or any candidate or organization or any position of this or any candidate or organization in connection with this or any other political campaign or election.”
- d. **Costs and Expenses.** Subject to prior approval by the senior university officer responsible for political activities, facilities use charges for such events may be waived for facilities managed directly by the university (but excluding, for example, the Liacouras Center which is managed by an independent contractor and does not fall within the ambit of this policy), but the sponsoring student organization is responsible for payment of all ancillary service costs associated with the event, including, without limitation, security, custodial, parking, and the like. No political fundraising activities may be conducted.
- e. **Students and University-Recognized Student Organizations** are permitted to support their own expressive activities and viewpoints on public policy issues and other interests and, as noted above, may sponsor events for candidates so long as they comply with the rules and regulations governing student organization-sponsored events. However, funds from the University General Activity Fee may not be used in such a way that could constitute a gift, donation or contribution to a political campaign. This includes purchasing promotional material (not including materials used to promote a student organization-sponsored event) or paying for campaign advertising for a political candidate or organization, providing an honorarium or travel costs to a political candidate or organization, or otherwise contributing to a political campaign.

3. Candidate or Campaign Use of University Facilities

Event Procedures:

- a. **Approval.** A Political Candidate or Political Organization acting independently, without a university sponsor, may request to rent university facilities that otherwise are available for rental generally by external groups. Campus facilities may be made available for such events in accordance with applicable facilities use policies and any associated guidelines. The Chief Compliance Officer, or his/her designee, has final authority to approve or disapprove the use of university facilities for any such event. In addition, certain university facilities, such as the Liacouras Center, are managed by independent contractors; rental of those facilities is determined by the independent contractor. The university department whose facilities will be used is responsible for notifying the office of Government Affairs of such requests.
- b. **Publicity.** Promotional material for an unsponsored event may not state or imply that the university endorses a Political Candidate or Political Organization or any position of a Political Candidate or Political Organization. Requests for press conferences or similar events on campus, by or on behalf of Political Candidates or Political Organizations are subject to this policy and the approval policy in this section.
- c. **Disclaimer.** At the beginning of any political event, after the event is fully convened, the Political Candidate or a representative of the Political Candidate, the Political Organization must deliver the following spoken disclaimer: “This event is sponsored by _____. The use of Temple University’s facilities for this event does not constitute an endorsement by the university. Temple University does not endorse this or any candidate or organization or the position of this or any candidate or organization in connection with this or any other political campaign or election.”
- d. **Costs and Expenses.** The Political Candidate or Political Organization must pay the full facility use charge and otherwise comply with applicable facilities use policies. The Political Candidate or Political Organization must pay all ancillary service costs associated with the event, including, without limitation, security, custodial, parking, audio-visual equipment set-up and operation, and the like. The Political Candidate or Political Organization may charge admission only in an amount necessary to cover its reasonable costs of the event. No political fundraising activities may be conducted. All facility use charges and the estimated ancillary service costs must be paid in full prior to the event.

4. Institutional Resources. University employees and representatives are prohibited from using institutional resources (including, without limitation, funds, vehicles, communications, duplicating or other equipment, supplies, services or mailing labels), for partisan political purposes, except as specifically permitted by this Policy. In addition, use of the university seal, letterhead, symbols, or other proprietary marks of institutional affiliation may not be used in any communications or activities that endorse a political party, campaign or candidate.

5. Candidacy for Elective Public Office

The candidacy of a university employee for election to a public office requiring full-time service or for election to a public office requiring part-time service for which compensation is more than nominal is presumed to create a conflict of commitment that materially interferes with the employee's responsibilities to the university and requires that the employee either obtain an appropriate leave of absence or resign from university employment.

The candidacy of a university employee for election to a public office requiring part-time service, for which no compensation is paid or for which the compensation is nominal, is not presumed to create a conflict of commitment that interferes materially with responsibilities owed to the university; provided that if the president or his/her designee believes that the employee's candidacy will create a material conflict of commitment, the question may be referred for resolution in accordance with the university's applicable conflict of interest and conflict of commitment policies.

6. Political Appointments or Elective Office. Upon election to or acceptance of appointment to a public office requiring full-time service, an employee of the university will be deemed to have resigned from his or her university employment; provided that if deemed practicable by the president or his/her designee, the employee may be granted an unpaid leave of absence from university employment, to coincide with the period of public service, not to exceed two years. Administrators, faculty and staff may accept political appointments or elective office requiring part-time service in accordance with otherwise applicable university policies regarding conflicts of commitment or interest and leaves of absence.
7. Persons Performing Work on Government-Sponsored Programs. Faculty and staff who perform services on projects or programs that are sponsored in whole or in part by a government agency may be subject to limitations imposed by the sponsor and/or applicable local, state or federal law (including, without limitation, the Hatch Act). Those persons should consult with the Ethics and Compliance Office and the Office of the Vice President for Research, Research Compliance, regarding their associated obligations.

8. Illustrative Guidance:
 - a. Examples of permissible activities include:
 - i. Non-partisan course work, curricular activities and assignments designed to educate students regarding the political process.
 - ii. University-sponsored non-partisan education or training programs created to enhance public understanding of the electoral process.
 - iii. Student political editorials and endorsements in a university-sponsored student newspaper.
 - iv. University-sponsored public forums to which all viable candidates are invited and to whom equal access and opportunity are provided.
 - v. University-sponsored non-partisan public opinion polls regarding issues (rather than candidates), provided that questions are framed to be fair and neutral and do not directly or indirectly concern records or positions of particular candidates or parties.
 - vi. Personal, individual membership in a political party.
 - vii. Voting in any elections (with time off as authorized by applicable leave policies).
 - viii. Public expression of views in an explicitly personal capacity.
 - ix. Personal contributions to a candidate for elected public office.
 - b. Examples of impermissible activities include:
 - i. Endorsement or other support of a Political Candidate by the institution, its officials, administrators, employees or agents in their official capacity.
 - ii. Campaign contributions by institutional officials or representatives in their official capacity or on behalf of the institution, and solicitation of campaign contributions by university employees or representatives in the workplace or in their official capacities.
 - iii. University reimbursement of political donations or activities.
 - iv. Linkage of university-sponsored voter education or registration activities with Political Events.
 - v. Participation in political activities during work time.

Notes

1. Dates of official enactment and amendments:

Adopted by the president on June 30, 2011. Revised November 12, 2021 and August 16, 2024.

2. History:

Initial Policy Effective Date: June 30, 2011

Amended: June 30, 2011 and August 2024

3. Cross References/Appendix:

Policy 04.34.01, Use of University Facilities
Policy 04.34.11, Space Management and Scheduling