Washington University in St. Louis
Guidance on Political, Campaign, and Lobbying Activity

Key Points

Washington University is committed to the expression and discussion of a wide variety of ideas and opinions and encourages members of the University community to be active and engaged citizens. 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.

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 Washington University community should coordinate with the Office of Government & Community Relations (935-5752) before such invitations are extended (refer to Section I and Section II).

University student groups registered with the Student Union may use University facilities for events involving government officials and candidates. University facilities may also be used to conduct non-partisan voter training and registration programs designed to increase an understanding of and participation in the electoral process. 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. The University reserves the right to impose any conditions or limitations upon the use of its facilities that it deems appropriate (refer to Section III).

The University’s mailing lists, communications infrastructure (including University websites and email systems), photocopying equipment, and other University services, resources or funds may not be used in support of any candidate, political party, or political action committee (refer to Section IV).

University employees that are candidates for public office should refer to the University Employee Handbook, the Faculty Information Handbook, and contact the Office of Government & Community Relations (935-5752) for additional guidance (refer to Section V). University students seeking public office are also strongly encouraged to consult with the Office of Government & Community Relations.

With the exception of specifically authorized employees, University faculty, staff, and other members of the Washington University community are not permitted to lobby on behalf of the University (refer to Section VI).

This guidance should not discourage members of the Washington University community from communicating with their elected representatives or engaging in political discourse as private citizens (refer to Section VII).

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Political, Campaign, and Lobbying Activity on Campus: Further Guidance

Washington University is required to remain politically neutral and cannot participate or intervene, directly or indirectly, in the campaign of any candidate or political party. The State of Missouri Charter that established Washington University requires the University to remain politically neutral. The University also enjoys tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, and thus is prohibited from engaging in political campaign intervention. Activities that constitute participation and intervention in a political campaign on behalf of or in opposition to a candidate include, but are not limited to, the publication or distribution of written or printed statements or the making of oral statements on behalf of or in opposition to such a candidate. Violation of this prohibition can result in the loss of the University’s tax-exempt status. Federal Election Commission regulations also restrict certain partisan activities. Additional federal and state laws place limitations on political activity, lobbying activity, campaign activity, and other engagement with candidates, elected officials, and staff.

Exceptions to these prohibitions exist, generally dealing with non-partisan educational and voter registration activities. Also, 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.

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 non-profit 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.

Section I: Hosting Government Officials and Staff

When invitations are extended to government officials to come to campus, or government officials request to visit campus, the Office of Government & Community
Relations works closely with the Office of Public Affairs, Office of Medical Public Affairs, and the sponsoring University organization to ensure that such visits comply with federal, state, and local law as well as University policies.

A speaker’s appearance must constitute a speech, question and answer session, or similar communication in an academic setting. The University may allow representatives of the news media to be present during a speaker’s appearance, but only if access is permitted in a politically neutral manner. Press conferences and other media events are generally not permitted on University premises without the consent and cooperation of the Office of Public Affairs and/or Office of Medical Public Affairs.

Invitations for government officials to visit campus should be shared and discussed with the Office of Government & Community Relations prior to extending any invitations. Requests from government officials to visit campus should immediately be shared with the Office of Government & Community Relations (935-5752). If the government official is also a candidate for re-election, please refer to Section II.

Section II: Hosting Candidates and Political Campaign Representatives

It is important for all members of the University community to adhere to certain standards applicable to appearances on campus by candidates, representatives of candidates, and other representatives of political parties or political action committees.

The University welcomes speakers to campus representing a diverse range of views and beliefs. However, to ensure that the University can accommodate a particular candidate or political campaign representative, members of the University community should first contact the Office of Government & Community Relations (935-5752) before extending an invitation.

The speaker’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. Sponsoring groups, 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 generally are not permitted on University premises.

Section III: Reserving University Space for Hosting Government Officials and Political Candidates

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 non-profit 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.

University student groups registered with the Student Union may use University facilities for events involving government officials and candidates. University facilities may also be used to conduct non-partisan voter training and registration programs designed to increase an understanding of and participation in the electoral process. 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.

University-recognized groups seeking to reserve University space should be aware that such requests are subject to specific requirements and limitations, and should follow the provisions outlined in these guidelines, as well as the Policy for Scheduling University Space Through Event Services (http://eventmanagement.wustl.edu) and/or the Policy for Scheduling University Space Through Individual Departments (http://www.wustl.edu/policies/scheduling.html) to ensure compliance.

Those wishing to reserve space should be reminded that University constraints and limitations exist that make accommodating certain speakers or events a challenge. Major events often impact the entire campus community. Our campus lacks a large 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, including Graham Chapel, have specific restrictions and requirements for use of the facilities such as capacity limits, sound amplification, photography restrictions, fees, and the serving of food and beverages. Sponsoring groups and speakers must comply with these requirements, and should consult Event Services (http://eventmanagement.wustl.edu) and/or the appropriate facility manager for details.

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.

The University’s mailing lists, communications infrastructure (including University websites and email systems), photocopying equipment, and other University services, resources or funds may not be used in support of any candidate, political party, or political action committee. 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. Distribution of campaign literature is limited by campus solicitation policies (Solicitation and distribution policy, University Employee Handbook – http://hr.wustl.edu/policies).

Members of the University community are prohibited from soliciting signatures on University property for non-University-sanctioned petitions, campaigns, or similar political activities. Anyone collecting signatures for petitions on public property 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 establishing a table in the Danforth University Center or South 40 Center, students should follow the Residential Life and Campus Life policies and procedures associated with all such requests (Advertising and Promotion Policy-- http://wustl.edu/policies/adpro.html).

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 she or he does not support.

Students seeking public office are strongly encouraged to meet with the Office of Government & Community Relations (935-5752) to ensure they understand University policy regarding the proper use of University property and resources. University employees should also refer to the next section of this guidance: Political Campaign Activity by University Employees.

**Section V: Political Campaign Activity by University Employees**

On occasion, members of the University community choose to pursue public office or engage in campaign-related activity while employed by the University. Employees engaging in those activities shall comply with all applicable State and Federal Election Commission and Internal Revenue Service rules and regulations that relate to or impact the University, the applicable provisions of the University Employee Handbook.
(http://hr.wustl.edu/policies), the Faculty Information Handbook (http://provost.wustl.edu/faculty_information_brochure), and the provisions of this policy.

If any campaign-related activity is expected to take place during the employee's normal working hours or to otherwise impair the employee's ability to carry out his or her normal employment obligations, the employee must assure strict compliance with the requirements of the federal, state, and municipal election regulations, and should consult with University administration before becoming a candidate or undertaking other such campaign-related activity.

An employee-candidate shall not use any University mailing lists, communications infrastructure (including University websites and email systems), photocopying services, letterhead, logos, facilities, personnel (while such personnel is on University time) or any other University resources for any campaign-related activities.

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: 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 only retains outside lobbyists 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.

Section VII: 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. 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.