

SAINT MARY’S COLLEGE POLICY ON POLITICAL ACTIVITY

Saint Mary’s College (the “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, the College shall not participate or intervene in the political campaign of any candidate for public office. Federal Elections Commission regulations also prohibit the College from facilitating 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. For avoidance of doubt, this policy is not intended to hinder staff, faculty, or students’ personal expressions of political views made in a person’s individual capacity and on their personal time.

College-recognized campus-based student organizations (“Student Organizations”) may organize and join political associations, advocate for and publicize political opinions, and participate in a political campaign on behalf of any candidate for public office *so long as their campus-based activities comply with College policies and procedures* (including this policy on political activities), *and applicable regulations*, including IRS regulations. Student activities funds or any tuition raised shall not be used for direct or indirect political action, support or endorsement. The College shall not directly or indirectly endorse any Student Organization that desires to support a particular candidate for public office. For purposes of this policy, “Endorse” means the College explicitly supporting or advocating for a group in favor of other groups, allocating student fee money (e.g., tuition) to a group, accepting money on behalf of such group, or allowing the College to, in some way, function as a conduit for the group. Student Organizations are strictly prohibited from fundraising on behalf of an elected official, political candidate, political campaign, political party, or other political organization on the College campus or in connection with College events. 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. During such an event, each candidate must be given an equal opportunity to present their views on the wide array of issues discussed. An explicit statement should be made as part of the introduction of the speaker and in communications concerning the speaker's attendance that the College does not endorse, support, or oppose a particular candidate, party, or political action committee ("PAC"), or any one or more of the views expressed during the event. The format and content of the event must be presented in a neutral manner; it must not be structured to promote or advance one candidate over another. Campus fundraising at the event is strictly prohibited. Student Organizations wishing to host a candidate must ensure their event complies with the College's policies, procedures (including this policy on political activity and the pre-approval procedure set below), and applicable IRS regulations, and must include a disclaimer specifying that the event is sponsored solely by the Student Organization without support or endorsement of the College. Such disclaimer of neutrality and nonpartisanship must appear in all promotional materials and notices of the event to both the College general body and the general public. Such promotional materials include print material, broadcasts, and linked website notices and hyperlinks to web pages. The College and the Student Organization 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.
- Inviting candidates to appear in a non-candidate capacity, so long as 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 upon written request.
- 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.
- Allowing officially recognized Student Organizations to use College's facilities for partisan political purposes, so long as such groups pay the usual and normal charge, if any, for use of the College's facilities by Student Organizations and/or for additional security deemed necessary by the College. Administrators and faculty must take special care in relation to any such proposed student activity, to avoid the appearance of institutional endorsement. The College shall not provide preferred treatment to any Student Organization.
- 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 the College's 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 College officials, such as the president or vice presidents, refraining from campaign activity due to the risk that such activity would be perceived as support or endorsement by the institution.
- Public statements, oral or written, by College officials (such as the president, vice presidents and deans) in support of a candidate, political party, PAC or the like, where the College 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 that encourage participants to vote in a particular way 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 communal 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.
- Coordinating voter education activities with campaign events.
- Coordinating College 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 College facilities or support to a candidate, campaign, political party or PAC.
- Using College 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 College’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 College 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 a College meeting by a College official in support of a candidate, political party, or PAC.
- Rate candidates, even on a non-partisan basis. This includes all candidate questionnaires, voting records, voting guides and any other materials in which one could compare candidates.

The lists above are taken from the American Council on Education (ACE) Political Campaign Related Activities of and at Colleges and Universities.

Approval Procedure for Hosting Political Events

Any individual or student organization wishing to host a political candidate or elected official on campus must submit a request for approval to the Dean of Students at least 30 days before the proposed visit. The Political Events Committee will review all requests. Approval request form can be found [here](#). Faculty, staff, students, and student organizations must adhere to all regulations outlined in this policy and other relevant guidelines regarding campus events.