

# DEPAUL UNIVERSITY

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## Political Campaign Activities

**Category:** Operations

**Responsible Department:** Community & Government Relations

**Responsible Officer:** Executive Vice President

**Effective Date:** 7/25/2016

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### Policy Summary

This policy provides guidelines for DePaul University and its faculty, staff and students about political activities. DePaul, as an organization exempt from tax under Section 501(c)3, may undertake no activity whatsoever on behalf of or in opposition to any candidate for public office, whether such office be federal, state or local. This is an absolute prohibition.

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### Scope

This policy affects the following groups of the University:

- Entire University Community

This policy affects all members of the university community.

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### Policy

#### Political Participation

DePaul University, consistent with its educational mission, supports and promotes participation in the political process on the part of its students, faculty and staff. Participation and voting in civil elections are among the highest responsibilities of good citizenship. The Higher Education Act of 1998 specifically mandates institutions that receive federal aid to promote voter registration.

All colleges and universities, however, are limited in the extent to which they, as institutions, may participate in campaign activities. DePaul is subject to limitations on political activity as a nonprofit, tax exempt organization. An organization exempt from tax under Section 501(c) 3 may undertake no activity whatsoever on behalf of or in opposition to any candidate for public office whether such office be federal, state or local. This is an absolute prohibition.

DePaul University, in order to protect its tax-exempt status as a 501(c) 3 organization, may not "participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office." Penalties for improper political campaign activity can include loss of tax exempt status, substantial taxes on DePaul

University (and on managers who knowingly violate the law), and federal or state government audits or investigations.

## **I. Activities of or Attributable to DePaul University**

### **A. Examples of Permitted activities**

1. Curricular activities aimed at educating students with respect to the political process, and addressing, during a political campaign, usual and customary permissible public policy education.
2. Voter education activities, if linked to DePaul's educational purpose.
3. Non partisan voter registration activities.
4. Conducting DePaul-sponsored public forums to which all legally qualified candidates (or, if impractical, at least all candidates who meet certain objective criteria) for a public office (or for the nomination of a particular party) are invited and given equal access and opportunity to speak. The format and content of the forum must be presented in a neutral manner.
5. Supplying a hyperlink to the Web pages of all candidates (or, if impractical, at least all candidates who meet certain objective criteria).
6. Circulating unbiased questionnaires to all candidates (or, if impractical, at least all candidates who meet certain objective criteria) and tabulating results.
7. Conducting training programs designed to increase public understanding of the electoral process.
8. Conducting public opinion polls with respect to issues, rather than candidates, provided that the questions are framed to be fair and neutral, accepted polling techniques are used, and the questions do not directly or indirectly concern records or positions of particular candidates or parties. With respect to such activities of faculty, the limitations should be addressed with due regard for academic freedom.

### **B. Examples of Prohibited activities**

The University or anyone acting on behalf of the University is prohibited from:

1. Posting or distributing posters, campaign signs, fliers, etc., for political candidates on campus.
2. Endorsing by or on behalf of the university, expressly or by implication, a candidate for public office whether such office be federal, state or local.
3. Making official comments on specific actions, statements, or positions taken by candidates (except issues pertinent to its tax free purpose).
4. Reimbursing university employees for campaign contributions.
5. Fund raising for a candidate for public office on university premises.
6. Conducting "voter education" activities, if confined to a narrow range of issues or biased in favor of a particular candidate or party.
7. Conducting voter registration activities that are similarly biased.
8. Coordinating voter education activities with campaign events.
9. Sponsoring events to advance the candidacy of particular candidates.
10. Providing to a candidate, campaign, political party, political action committee (PAC) or the like mailing lists, use of office space, computers, telephones, fax machines, photocopiers, or other DePaul supplies or facilities.
11. Publishing ratings of the candidates, where it could be viewed as reflecting views of DePaul.

12. Promoting action (e.g., voting) with respect to issues that have become highly identified as dividing lines between candidates.
13. Use of message boards and forums on DePaul's Web site to support particular candidates if the statements of the provider of the information can be reasonably attributed to DePaul (a disclaimer that states that the opinions are neither the opinion of the University nor sanctioned by the university is recommended in those public discussion areas where the information could reasonably be attributed to the university).

## **II. Activities of Faculty, Administrators and Other Employees of DePaul University**

In addition to the institutional policy stated above, individual employee participation is subject to the following:

### **A. Examples of Permitted activities**

1. Participating in the election process off hours, or engaging in campaign-related activity outside of the time an employee is paid by the university, provided he or she is not speaking or acting in the name of DePaul University or at the direction of a university official.
2. Contributing analysis and expertise based on an employee's academic or professional discipline to media reports designed to enhance the public's understanding of current events. This includes attribution identifying one's status as a DePaul employee if useful to establish credentials, and citing an employee's title when submitting for publication opinion editorials and letters to the editors, which are commonly understood to represent the personal views of the author.

### **B. Examples of Prohibited activities**

1. Faculty, administrators and other employees may not use DePaul letterhead in support of a candidate, campaign, political party, political action committee (PAC) or the like.
2. Institutional officials (such as the President or Deans) may not make public statements, oral or written, in support of a candidate, campaign, political party, PAC, or the like where there is risk that the statements would be perceived as support of or endorsement by the university.
3. An employee's DePaul affiliation should not be used in connection with campaign-related interviews, submission of editorials, or letters to the editors that are not related in any way to an employee's professional expertise.

## **III. Activities of Students of DePaul University**

### **A. Examples of Permitted activities**

1. A student newspaper that is financially supported by the university may engage in partisan editorial activities, given the student newspaper provides a disclaimer that the editorial views do not reflect those of the university.
2. Student organizations recognized by the Office of Student Involvement may use DePaul facilities for partisan political purposes, provided the organizations pay any normal charge for use of facilities, if any. It must be made clear that views presented by the organizations do not reflect those of the university.

3. DePaul student radio station may provide access to airtime to political candidates, provided it is offered on an equal basis to all candidates and it is made clear that views presented do not reflect those of the university.
4. Students may wear political reference paraphernalia.
5. Students may post campaign signs, fliers, etc., for political candidates in their personal rooms, only if such material is not posted for public viewing (i.e., not placed in a window facing out).

#### B. Examples of Prohibited activities

1. Student organizations are prohibited from providing to any individual or group in support of a candidate, campaign, political party, political action committee (PAC), or the like, university developed or provided mailing lists, use of DePaul letterhead, office space, computers, telephones, fax machines, photocopiers, or other DePaul supplies or facilities.

Soliciting of students on campus to work in a campaign unless sponsored by a recognized student organization. Student organizations are prohibited from providing to any individual or group in support of a candidate, campaign, political party, political action committee (PAC), or the like, University developed or provided mailing lists, use of DePaul letterhead, office space, computers, telephones, fax machines, photocopiers, or other DePaul supplies or facilities.

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## Procedures

Contact the Office of Community & Government Relations for further information regarding this policy. For student matters, contact Student Affairs.

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## Divisional Collaborations

Office of Community & Government Relations  
Office of the General Counsel  
Institutional Compliance  
Student Affairs

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## Contact Information

### Office of Community & Government Relations

Peter Coffey, Associate Vice President  
[pcoffey2@depaul.edu](mailto:pcoffey2@depaul.edu)  
(312) 362-7144

### Student Affairs

[studentaffairs@depaul.edu](mailto:studentaffairs@depaul.edu)  
(773) 325-4852

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## Appendices

None

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## **History/Revisions**

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