Guidelines for Employees: Political Campaign Activity

September 2018

The Johns Hopkins Health System (JHHS) is committed to the free and open expression of ideas. JHHS encourages members of its community to be engaged civically and to participate in the electoral process at all levels: local, state, and federal. Federal law, however, provides that a tax-exempt organization such as JHHS may not itself “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.” [Section 501(c)(3) of the Internal Revenue Code]. A violation, whether intentional or unintentional, could have serious ramifications for JHHS.

This document provides practical guidance to employees of JHHS on complying with JHHS policy and IRS requirements. Of course, no set of guidelines can address every potential situation. Questions should be addressed to the Office of Government and Community Affairs (443-287-9900).

Generally

Employees may engage in partisan political activities provided they do so on their own time, in their personal capacities, and without the use or support of JHHS resources.

Participation in Political Campaign Activities

Employees may participate in political campaigns provided it is clear that their statements and activity are undertaken on their own behalf and not on behalf of JHHS. If an employee’s JHHS affiliation is mentioned for identification purposes in connection with his or her political activity, it must be made explicitly clear that the employee is acting in his or her personal capacity and not on behalf of JHHS. All employees must refrain from using JHHS resources in the course of their participation in any political campaign. For the purposes of complying with policy, “JHHS resources” includes — but is not limited to — letterhead, Johns Hopkins email accounts, JHHS’s other physical facilities, office supplies, phones, computers and the use of staff to support campaign activities (of course, staff may, on their own accord, engage in political activity on their own time and without use of JHHS resources).

Fundraising

As a non-profit entity under federal law, JHHS is prohibited from engaging in fundraising on behalf of a political candidate or party. In that regard, employees must avoid the following activities:

- Using JHHS funds to make or reimburse individuals for political donations; or
- Soliciting employees, patients, or the general public to make political contributions or support a political candidate using their JHHS letterhead, stationery or websites; or
- Requiring staff to solicit or make campaign contributions.
The prohibition on fundraising does not prohibit employees from engaging in such activities in their personal capacities. However, fundraising must be undertaken on their own time and without use of JHHS resources.

**Campaigning**

JHHS cannot engage in any campaign activity in support of or against a party or a candidate for elective office. Use of the JHHS/JHM name in support of or against a particular candidate’s campaign is forbidden.

To the extent employees engage in correspondence, e-mails or other communications for the purpose of campaigning, they must not use JHHS letterhead or resources and must make clear that they are acting in their private capacities and do not represent the views or position of JHHS. If such communications make reference to an employee’s affiliation with JHHS, he or she should include the following statement:

“The views stated in this communication are my own and do not express the position or views of The Johns Hopkins Health System Corporation.”

In addition, employees must not provide hyperlinks on a JHHS website to a candidate’s website or linking to other material supporting one candidate over another.

As provided by the JHHS Appearance Standard Policy, out of consideration for patients, visitors and co-workers, employees may not wear political statements, buttons or other paraphernalia.

**Use of space**

Campaigns and candidates who seek to use or rent JHHS space for a campaign-related speech or event are subject to the rules and requirements pertaining to such uses. Any established fee or rent must be paid, and cannot be waived by the JHHS office responsible for the space. Any events must be conducted in accordance with applicable JHHS policy and the law and should be reviewed in advance by Government and Community Affairs.

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In compliance with the IRS requirements, JHU has a Policy on Political Activities. See: [http://www.jhu.edu/news_info/policy/politic.html](http://www.jhu.edu/news_info/policy/politic.html).

Please contact Government and Community Affairs (443-287-9900) with any specific questions regarding these guidelines or participation in political campaign activities.