

Campaigns: Frequently Asked Questions

As not-for-profit, tax-exempt entities, The Johns Hopkins University (JHU) and The Johns Hopkins Health System Corporation (JHHS) are required to comply with regulations related to political activity and campaigning for public office.

The offices of Federal Strategy and Government and Community Affairs (GCA) are charged with executing the institution's advocacy agenda and assisting JHU and JHHS faculty and staff to ensure compliance. The General Counsel's Office at JHU or JHHS can also provide guidance. Below you will find some practical information to help you understand the requirements to comply with federal law.

Generally: Faculty and staff 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 university or health system resources.

Questions? Contact: (443) 997-5999 or gca@jhu.edu

Q & A: Campaign Activity

1) Can I participate in a political campaign activity?

Yes! Faculty and staff may participate in political campaigns, provided it is clear that your statements and activity are undertaken on your own behalf and not on behalf of the university or health system. If your Johns Hopkins affiliation is mentioned for identification purposes in connection with your political activity, it must be made explicitly clear that you are acting in your personal capacity and not on behalf of Johns Hopkins. You should include this statement to make it explicitly clear:

"The views stated in this communication are my own and do not express the position or views of The Johns Hopkins University/ The Johns Hopkins Health System."

You cannot use university or health system resources in the course of your participation in any political campaign.

2) What are "university or health system resources"?

For the purposes of complying with the stated policy, "university or health system resources" includes — but is not limited to — university or health system letterhead, *Johns Hopkins email accounts* (use a personal email account), the university's and health system's other physical facilities, office supplies, phones, computers and the use of staff to support campaign activities. Do not place campaign signs on university premises, including your office. Despite these limitations, you remain free, on your own accord, to engage in political activity on your own time and without use of university or health system resources.

3) I'm really supportive of a political candidate and would like to encourage my colleagues to support them. Can I ask for donations to a campaign?

Sorry, but only on your own time and in your own personal capacity. As non-profit entities under federal law, JHU and JHHS are prohibited from engaging in fundraising on behalf of a political candidate or party. In that regard, faculty and staff must not engage in the following activities:

- Using JH funds to reimburse individuals for political donations; or
- Soliciting staff or faculty to make political contributions or support a political candidate using JH letterhead, email accounts, stationery, or websites;
- Providing hyperlinks on university websites to a candidate's website or linking any material supporting one candidate over another; or
- Requiring staff to solicit, collect, or make campaign contributions. Never solicit contributions from subordinate staff, whether on personal time or at work.

Again, this prohibition on fundraising does NOT prohibit you from engaging in such activities in your own personal capacities. Just be sure your fundraising activities are undertaken on your own time and without the use of university or health system resources. Federal campaign law prohibits anyone who is not a citizen or legal permanent resident ("green card" holder) from contributing to campaigns.

4) There's a candidate who supports all the ideals and policies that I think Johns Hopkins does. Can Johns Hopkins endorse them for office?

JHU and JHHS cannot engage in any campaign activity in support of or against a party or a candidate for elective office. Use of the JHU or the JHHS name in support of or against a particular candidate's campaign is forbidden, irrespective of positions and proposals. There are serious repercussions if this occurs.

5) There is a candidate whose ideas are really interesting and could provide a great discussion on campus. Can I invite them to speak?

JHU and JHHS, JHU or JHHS faculty or staff, or student groups may invite a candidate to speak on campus provided all candidates are provided an equal opportunity to speak. For example, if a student Democratic club invites a Democratic candidate to speak on campus, the student Republican club must have an equivalent opportunity to invite the Republican candidate for the same office. JHU and JHHS, or JHU or JHHS faculty or staff, or student groups may also conduct forums and debates provided that all candidates are given an equal opportunity to participate. The format and content of the debate should be presented in a neutral manner. An explicit statement should be made as part of the introduction of any speech, debate, forum, or other political event that the university does not endorse candidates for public office.

If a candidate is invited to speak in a non-candidate capacity, you must be able to articulate reasons for their invitation other than their candidacy (i.e. a subject-matter discussion, policy discussion, etc.). In this situation, they can only speak in a non-candidate capacity, no reference to the election can be made, and a nonpartisan atmosphere must be maintained during the event. Campaigning at such an event is prohibited. The non-candidate status should be clearly indicated and the candidacy must not be mentioned.

Organizers must notify Federal Strategy & Government and Community Affairs and the General Counsel's Office in advance of such a forum or debate. Contact us at 443-997-5999 or gca@jhu.edu.

6) I've received a request from a candidate for office about using space on my campus. Can I allow them to do so?

Campaigns and candidates who seek to use or rent a JHU or 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 JHU or JHHS office responsible for the space.

Any events must be conducted in accordance with applicable JHU or JHHS policy and the law and should be reviewed in advance by Federal Strategy and GCA. Contact us at 443-997-5999 or gca@jhu.edu.

7) A candidate for public office has asked my expertise in developing a policy plan. Can I respond?

Congratulations for recognition of your expertise! *The first step is to alert your dean or manager and Federal Strategy or GCA in advance of agreeing to the request.* Unless it's clear that your service to the candidate would be done on your personal time, in your personal capacity, without use of any JHU or JHHS resources, providing such expertise could constitute a prohibited and restricted campaign activity.

8) Campaigns are talking about and developing plans in an area that I am an expert in. Can I reach out to them to help?

The opportunity to impact policy as an expert is important, and you can exercise your right to participate, but it must be on your own time with your own resources. Faculty and staff cannot use university or health system resources to aid, work for, or otherwise engage political campaigns.

9) I'd like to make sure everyone who can vote is registered to do so and participates on Election Day. Am I allowed to engage my colleagues, students, and others on campus in this activity?

Voting is an important civic engagement. You can register voters, provided the registration activities are nonpartisan. Examples of activities around voter education and voter registration that are permitted on campus include:

- Training programs designed to increase public understanding of the electoral process or to encourage citizens to become involved in the process, provided that such training is nonpartisan in the recruitment of instructors, the selection of students, and the curriculum. The program should be widely publicized, although groups underrepresented in the electoral process may be targeted.
- Participating in nonpartisan voter registration activities, even when aimed at groups (such as urban voters, young people, or minorities) likely to favor a certain political candidate or party, provided that the activities are not intended to target voters of a particular party or to help particular candidates, and provided further that particular geographic areas are not selected to favor any party or candidates.
- Rearranging the academic calendar to permit students, faculty, and administrators to participate in the election process, if the rearrangement is made without reference to particular campaigns or political issues, provided that the recess is in substitution for another period that would have been free of curricular activity.

IMPORTANT: A federal law known as the Byrd Amendment (31 U.S.C. §1352) prohibits the recipients of federally sponsored grants from using those funds to lobby or influence public officials.