

Guidelines for Faculty and Staff: Campaign Activity

September 2018

The Johns Hopkins University is committed to the free and open expression of ideas. The university encourages members of the JHU community — faculty, staff and students — 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 JHU 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 the university.

This document provides practical guidance to members of the university community on complying with university policy and IRS requirements. Of course, no set of guidelines can address every potential situation. Questions should be addressed to the General Counsel’s Office (410-516-8128) or Government and Community Affairs (443-287-9900).

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 resources.

Participation in Political Campaign Activities

Faculty and staff 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 the university. If an employee’s university 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 Johns Hopkins. All employees must refrain from using university resources in the course of their participation in any political campaign. For the purposes of complying with university policy, “university resources” includes — but is not limited to — university letterhead, Johns Hopkins email accounts, the university’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 university resources).

Fundraising

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

- Using JHU funds to reimburse individuals for political donations; or
- Soliciting staff or faculty to make political contributions or support a political candidate using JHU letterhead, stationery or websites; or
- Requiring staff to solicit or make campaign contributions.

The prohibition on fundraising does not prohibit faculty and staff from engaging in such activities in their personal capacities. However, fundraising must be undertaken on their own time and without use of university resources.

Campaigning

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

To the extent faculty and staff members engage in correspondence, e-mails or other communications for the purpose of campaigning, they must not use university letterhead or resources and must make clear that they are acting in their private capacities and do not represent the views or position of the university. If such communications make reference to a faculty or staff member's affiliation with JHU, 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 University."

In addition, faculty and staff must not provide hyperlinks on a university website to a candidate's website or linking to other material supporting one candidate over another.

Candidate Speeches, Debates and Forums

JHU, or a JHU faculty, staff, or student group 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, or JHU faculty, 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. Organizers must notify Government and Community Affairs and the General Counsel's Office in advance of such a forum or debate.

Use of space

Campaigns and candidates who seek to use or rent JHU 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 office responsible for the space. Any events must be conducted in accordance with applicable JHU 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.

Please contact Government and Community Affairs or the General Counsel's Office with any specific questions regarding these guidelines or participation in political campaign activities.