
Policy on Political Campaign Activities

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Reason for Policy

Gonzaga University is an academic community dedicated to the advancement of learning. It is guided by a Catholic, Jesuit, and humanistic mission to advance the Gospel values of faith and justice through teaching, advocacy and example. To serve these objectives, members of the University community must be free to engage the full range of views on a variety of subjects.

In addition, Gonzaga University, as a tax-exempt charitable and educational organization, is absolutely prohibited from directly or indirectly participating or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elected public office. For example, contributions to a political campaign or public statements of position (oral or written) made on behalf of the University in favor of, or in opposition to, any candidate for public office clearly violate the prohibition against the University engaging in Political Campaign Activity. Violating this prohibition may result in denial or revocation of the University's tax-exempt status and the imposition of certain excise taxes. The scope of political activities that the University is prohibited from participating in includes individual candidate campaigns for elected office, ballot initiatives and referenda (hereinafter "ballot measures"), political party activities, and political action committees (PACs).

Scope

Members of the University Community (faculty, staff, students, and volunteers).

Policy Statement

A. General.

Members of the University community (faculty, staff, trustees, regents, students, and volunteers) are free to engage in Political Campaign Activities provided that they do so solely in their personal capacities, without using University Resources, and avoiding any appearance that they are speaking or acting on behalf of the University.

B. Permissible Activities.

(1) **Individual Rights.** Notwithstanding any activity otherwise restricted or prohibited by this Policy, employees are reminded that they may engage in Political Campaign Activities during their own time and using privately owned resources. Members of the University community are free to become involved in political campaigns as they choose, so long as they do so in a way that does not, in either an overt or implied manner, involve the University or University Resources.

(2) **Teaching and Academic Freedom.** This Policy does not restrict the study or discussion of political issues or the teaching and learning of political techniques or otherwise affect academic activities concerning public policy issues. See Faculty Handbook Sections 305.00 Academic Freedom for Faculty, 305.03 (Adaption of 1940 AAUP Statement on Academic Freedom and Tenure), and Appendix 300B (1940 AAUP Statement on Academic Freedom and Tenure).

C. Examples of permissible Political Campaign Activities include:

(1) Provided that an employee does so on the employee's own time, and not using University Resources, an employee may: (a) participate in campaigns for political office for their candidacy for office, other candidates, or ballot measures; (b) participate in the management of a political campaign or may hold any office within a political party; (c) solicit voluntary campaign contributions to support or oppose a political candidate or ballot measure; or (d) make personal campaign contributions using the employee's own funds.

(2) Employees may request leave for Political Campaign Activity using regular leave request procedures.

(3) When engaging in Political Campaign Activities, faculty, staff, trustees, regents, students, and volunteers (including student volunteers) may not state or imply that they are speaking or acting on behalf of the University. If a University employee engaged in Political Campaign Activities uses their University employee title and affiliation, such use should be only for identification and should be accompanied by a statement that the person is speaking as an individual and not as a representative of the University. No University funds, regardless of the source, may be used to contribute toward a political

campaign or PAC.

D. Use of University Resources

(1) **Student Use:** Because students are not regarded as speaking for the University, the rules pertaining to recognized student organizations using University space for tabling and/or meeting rooms are to some extent less restrictive than the rules applicable to other members of the University community. When consistent with its purpose, a recognized student organization may use University space for tabling and/or meeting rooms for recognized student organization internal meetings involving Political Campaign Activities, provided that such groups (a) pay all applicable fees, if any, for use of University facilities by recognized student organizations; (b) do not engage in political campaign fundraising in University facilities; (c) do not use University Resources for the student organization's Political Campaign Activities other than use of the University space for tabling and/or meeting rooms assigned to it by GUEST and such other University Resources as necessary and appropriate, as determined by the recognized student organization's advisor, to inform members of the University community about the activity; (d) limit participation in the activity to members of the University community; and (e) obtain prior written approval through the process set forth in the Events Policy for any guest speaker. Staff and faculty advising recognized student organizations must take special care in relation to any such proposed student activities, to avoid the appearance of institutional endorsement. Any recognized student organization engaging in Political Campaign Activity must make it clear in its written material at its events or meetings that its members are not on behalf of the University. If a recognized student organization is hosting a meeting or event involving Political Campaign Activities that is open to the public, the facilities use requirements applicable to non-University Groups in paragraph D. (2), below apply.

(2) Non-University Groups utilizing University property or facilities for Political Campaign Activity shall be charged standard, published fees for using University facilities, related services by University employees not covered by the published fees, and all expense incurred and paid to third parties by the University as part of the event. The University shall rent facilities to Non-University groups for Political Campaign Activity only after ensuring such use does not conflict with other University facilities use requirements. If facilities are rented to one campaign or candidate, facilities must be made available to all other campaigns and candidates at the same terms and prices. The University may choose not to rent facilities to campaigns for both sides of a particular ballot measure. The facilities rented to a campaign or candidate shall be the type rented to the public and not only to campaigns and candidates. No new University activity or service shall be created to support a request from a campaign or candidate. Additionally, non-University groups renting facilities for Political Campaign Activities shall: (a) comply with all University requirements concerning use of University facilities by non-University groups including, but not limited to, insurance and security; and (b) make full payment for all services received. No services shall be provided at a reduced rate or at no cost.

(3) If a candidate is invited by the University to speak in a non-campaign capacity or is invited to participate in a public candidate forum on campus, no campaign or candidate shall be permitted as part of the event to: (a) conduct a rally; (b) distribute campaign literature, buttons or banners; or (c) conduct fundraising on campus or using University Resources.

(4) If a campaign or candidate is renting space on campus, invited by a recognized student organization, or participating in a public candidate forum, all written materials and advertisements concerning an on-campus appearance of a campaign or candidate shall include the following disclaimer. This disclaimer shall also be announced at the start of an event: (a) the views expressed are those of the candidate or person speaking for the candidate or campaign only; (b) Gonzaga University does not support or oppose any political candidates; and (c) the name of the sponsoring organization shall be identified.

(5) Promotional materials concerning Political Campaign Activity or a campaign event taking place on campus cannot use Gonzaga University logos or photos of campus.

E. Prohibited Activities.

(1) **General.** Except as specifically provided for in this Policy, faculty, staff, trustees, regents, students, and volunteers (including student volunteers) are prohibited from using University Resources to engage in Political Campaign Activities in support of, or in opposition to, a political candidate or ballot measure. This prohibition includes giving and receiving of funds or endorsements on behalf of the University. The University's name and logo shall not be used by any groups or individuals while engaging in Political Campaign Activities.

(2) **Exceptions.** The following are exceptions to the prohibition against engaging in Political Campaign Activities in support of, or in opposition to, a political candidate or ballot measure using University Resources: (a) Section D (1) of this Policy concerning the use of University Resources by recognized student organizations for Political Campaign Activities; and (b) Section H of this Policy concerning use of University Resources by the President or his designee(s) for limited issue advocacy.

(3) **Employment Discrimination.** The University and employees acting on behalf of the University, may not discriminate against an employee in the terms or conditions of employment for: (a) the failure to contribute to; (b) the failure in any way to support or oppose; or (c) in any way supporting or opposing a candidate, ballot proposition, political party, or political committee in the employee's individual capacity. See RCW42.17A.495.

F. Public Candidate Forums, Voter Education, and Voter Registration Programs.

(1) **General.** Certain activities or expenditures may not be prohibited depending on the facts and circumstances. For example, certain voter education activities (including presenting public forums and publishing voter education guides) conducted in a nonpartisan manner do not constitute prohibited Political Campaign Activity. In addition,

other activities intended to encourage people to participate in the electoral process, such as voter registration and get-out-the-vote drives, would not be prohibited Political Campaign Activity if conducted in a nonpartisan manner. On the other hand, voter education or registration activities with evidence of bias that (a) would favor one candidate over another; (b) oppose a candidate in some manner; or (c) have the effect of favoring a candidate or group of candidates, will constitute Prohibited Campaign Activities or intervention.

(2) Public Candidate Forums. As part of its educational mission, the University may invite candidates to participate in on-campus public candidate forums provided that: (a) all registered candidates for a particular elected office are invited to participate; (b) the event does not favor or endorse a particular candidate or side of a ballot measure; (c) the event does not include any campaign rally activity, banners, or fundraising; (d) the event does not include the distribution of campaign literature, bumper stickers, or campaign buttons or the sale of merchandise including books; and (e) a disclaimer described in paragraph D. (4), above is used. Members of the University community who wish to host a public candidate forum must submit a formal request utilizing the process detailed in the University Events Policy.

(3) Public Voter Education and Voter Registration Programs. As part of its educational mission, the University may engage in public voter education and registration programs provided that the programs are: (a) unbiased; (b) nonpartisan; (c) widely publicized; and (d) do not target voters of a particular party or help particular candidates or ballot measure campaigns. Prior to conducting any voter education or registration programs, University community members planning such activities must submit a formal request utilizing the process detailed in the University Events Policy.

G. Non-Political Campaign On-Campus Appearances by Candidates.

A political candidate may appear on campus in a non-campaign capacity provided that: (1) the event is sponsored or hosted by the University or a recognized student organization and not a non-University entity or individual; (2) the candidate is invited to speak for reasons other than his/her candidacy for elected office; (3) the candidate speaks only in a non-candidate capacity; (4) the nonpartisan event does not include campaigning by others or fundraising; (5) the hosting University department or recognized student organization avoids the appearance of institutional endorsement of a particular candidate; (6) the event is open to the entire University community, regardless of political affiliation, and (7) the event is not organized or run by the candidate or representatives of a non-University group. Members of the University community who wish to invite a candidate to appear on campus must submit a formal request utilizing the process detailed in the University Events Policy.

H. Limited Issue Advocacy by the University.

Notwithstanding any provision of this Policy to the contrary, when specific proposed federal, state, or local legislation or a ballot measure involves matters that are directly

related to the University's core interests and the University President determines that the University should take a position with respect to the legislation or ballot measure, only those persons specifically authorized by the President may speak or write on the matter on behalf of the University. Employees may submit written requests for limited issue advocacy by the University to their area vice president, who will present the request to the President. Students may submit written requests for limited issue advocacy by the University to the Associate Provost for Student Development, who will present the request to the Provost & Senior Vice President for review with the President.

I. Interpretation, Questions, and Coordination.

The Office of General Counsel is responsible for interpretation and application of the guidelines and restrictions in this Policy. Questions regarding compliance with this Policy by recognized student organizations should be directed to the Office of the Associate Provost for Student Development. All other questions should be presented to the Office of the General Counsel. Prior to seeking approval to use University facilities as described in this Policy, persons seeking approval shall coordinate with GUEST to determine if the facilities are available.

Definitions

Engage. For the purpose of Section E.1. of this Policy, the term “engage” requires an affirmative effort to participate in Political Campaign Activities. Thus, for example, an individual's mere receipt and reading of an unsolicited written communication (e.g., email, fax, or mail) or receipt and answering of an unsolicited phone call from a political campaign that is sent or delivered by or through a University Resource would not be considered to be engaging in Political Campaign Activities by the employee receiving the communication.

Political Campaign Activities. As used in this Policy, the term “Political Campaign Activities” means all activities that support or oppose candidates for elective federal, state or local public office or a state or local ballot measure. A candidate is one who offers himself/herself, or is proposed by others, for a public office regardless of whether the ballot identifies the candidate as being affiliated with a political party or no political party. Political Campaign Activity does not include any activity to encourage participation in the electoral process, such as voter registration or voter education, provided that the activity does not directly or indirectly support or oppose any candidate or ballot measure. Prohibited Political Campaign Activities by employees on duty do not include: (1) political campaign stickers affixed to vehicles parked on campus; or (2) political campaign items such as shirts, hats, stickers, buttons, and/or pins worn by, or affixed to an employee's clothing, while the employee is performing University employment functions. Employees are urged to consider not wearing such items while representing the University in face-to-face or video meetings with third parties to assist the University in avoiding the appearance that the University is endorsing a particular campaign.

University Resources. As used in this Policy, the term “University Resources” means all University funds, property, and services, including offices and other facilities, equipment, computers, printers, mail service, telephone, employee and student email, internet, paper, pens, stationary, purchasing cards, logos, insignia, digital and social media, and trademarks.

Exceptions

N/A

Sanctions

Violation of this policy by an employee may subject that employee to disciplinary actions up to and including dismissal from employment, depending on the nature and severity of the policy violation.

Related Policies, Documents & Forms

[Events Policy](#); *Student Development*

[Policy on Use of University Facilities for Events](#); *Administration*

[Public Expression of Personal Views Policy](#); *Human Resources*

[Information Technology Use Policy](#); *Information Technology Services*

For additional information on the issues associated with those addressed in this Policy, a memorandum entitled [Political Campaign-Related Activities of and at Colleges and Universities](#) is available at the American Council on Education (ACE) web page (acenet.edu).