Political Activities at Brown University

Introduction
Brown University encourages all members of its community to be informed and engaged in the democratic process. The University supports campus-based activities and programs that enhance the individual capacity of members of the Brown community to fulfill their rights. However, in compliance with federal regulations, Brown must maintain a policy on the permitted use and restrictions of University facilities and resources for partisan, politically-related activity on campus by students and employees.

Violation of IRS regulations could have serious ramifications for the University, including loss of its tax-exempt status.

This policy and associated guidelines cannot address every potential situation. Questions regarding these guidelines should be addressed to the Office of Government and Community Relations (OGCR) (401-863-1885) or, if related to student-sponsored activities, the Student Activities Office (401-863-2341).

Policy Statement
As a non-profit, private institution of higher education whose activities are regulated in part by Section 501(c)(3) of the Internal Revenue Code (IRS), the University is prohibited from participating in political campaigns for candidates, political parties and political organizations or ballot initiatives, and is restricted in conducting lobbying activities. This prohibition extends to students and employees.

The parameters of acceptable and restricted activity at Brown under this policy are outlined in the “Responsibilities” and “Procedures” sections of this document.

Brown University reserves the right to amend or modify this policy and its associated guidelines at its discretion or as it deems necessary to comply with the regulations governing political activities of 501(c)(3) entities.

Responsibilities

I. Students and Student Organizations
University-recognized campus-based student organizations may participate in a political campaign on behalf of any candidate for public office as long as their campus-based activities comply with University policies and procedures (including this policy on Political Activities at Brown), and applicable IRS regulations.

Organizations created to advocate for the election of a political candidate (i.e. Students for Candidate X) or ballot initiative may not receive funding from the University. Other organizations are also prohibited from receiving University funding, such as student activities fees, for restricted activities. Student organizations will not be permitted to use University facilities or resources to fundraise for activities prohibited by this policy or IRS regulations.

Distribution of campaign materials is generally prohibited on campus. However, University-recognized student organizations are permitted to reserve information tables for the purposes of distributing information about candidates, provided they follow Brown’s policies and procedures for such tables, including making a reservation through the Student Activities Office. In accordance with University procedures restricting solicitation within on-campus residences, organized campaigning is not permitted in on-campus housing.
II. Faculty and Staff

Administrative officers, faculty, and staff may take part in partisan political activities freely on their own time, but they must not do so in the course of their regular work and responsibilities for the University. When endorsing or opposing a candidate for political office or taking a position on an issue for the purpose of assisting or opposing a candidate, employees (faculty or staff) may not give the appearance that they are representing the University.

Brown University employees may not — and should not be asked to — perform tasks related to partisan political activities during working hours.

Campus-based faculty and staff groups are prohibited from organizing for the purpose of influencing legislation or participating in political campaigns.

For limitations on interacting with elected officials, please refer to the “Lobbying Rules” section below. For questions on running for office, see the “Seeking Public Office” section below.

Procedures

I. Use of University Facilities and Resources

All use of University facilities and resources is subject to University policies regulating time, place, and manner of use. The following may generally not be used by any person or organization for activities restricted by this policy, regardless of whether the activity is on or off campus:

- University funds, including the Student Activities Fee, and the University’s sales tax exemption for purchase of goods and services;
- Use of University name, logo or marks — specifically, neither the Brown University name, nor that of any University entity that is supported in part or whole by the University’s funds, nor University insignia/indicia, may appear on stationery or any other material used or intended for political purposes other than the use of Brown University to specify the location of an activity or event or, as appropriate, identifying the sponsor as a Brown chapter or collection of individuals from Brown, but not in such a way as to construe that the event is, in any way, officially endorsed or sponsored by the University;
- Use of University title or position — such information should only be used for identification and not an indication of University endorsement;
- Any University-sponsored campus communication system, including but not limited to the phone system, University-issued cell phone and other electronic devices, University letterhead, the campus mail system, listservs, and the University’s computer and Internet network;
- University bulk-mailing privilege and mailing lists — including the addresses of departmental offices or faculty or staff offices and e-mail addresses;
- University-provided office supplies, computers, telephones, facsimile machines, copiers or other equipment (however, use of pay-per-use services, such as the campus copying service, may be used as long as the funds to pay for such use are not University funds); and
- Film or other image capture (video, livestream and photographs) of classrooms, residential spaces, dining areas, campus greens, buildings and other University property for political campaign purposes.

Campaign materials may be posted on public, exterior bulletin boards as long as they are in accordance with University posting and publicity regulations. The sidewalks next to public streets are city property and not subject to these regulations.
II. Nonpartisan Activities

Brown cannot directly or indirectly offer institutional endorsement of political candidates, but certain nonpartisan political activities (such as properly organized voter registration activities and voter education programs) sponsored by a University department or officially recognized campus organization may be held on campus.

III. On-Campus Appearances by Candidates

Candidates for public office or their designees are welcome to appear on campus for non-campaign related activities, such as an educational or informational talk to the University community. Such appearances must be sponsored by a University department or officially recognized campus organization and satisfy the following criteria:

- The individual(s) is/are chosen to speak for reasons other than candidacy for public office;
- The individual speaks in a non-candidate capacity;
- The event or organization maintains a nonpartisan atmosphere;
- No specific organized campaigning activity occurs in connection with the event.
- Any such event must be open first to the entire University community (without preference based on political affiliation) and then, if space permits, to the general public (again, without preference based on political affiliation); and
- The event meets any additional criteria appropriate for the particular event as determined by the University.

Student organizations must initiate requests for an appearance of a candidate for public office in a non-candidate capacity through the Student Activities Office.

In addition, three options exist for campaign-related appearances of candidates and their surrogates. In all three cases, fundraising is strictly prohibited and approval must be obtained from OGCR:

1. Candidate Debates. Brown will consider requests to host political debates on campus from recognized organizations within the Brown campus community or from non-partisan, non-profit civic organizations or media partners, with a focus on hosting such debates in elections that have candidates representing multiple political parties (typically general elections). All candidates duly registered for the ballot must be invited and given a reasonable opportunity to agree to participate, and the event must be managed in such a way as not to favor or endorse any particular candidate. Arrangements and formats for such debates must be reviewed and approved by OGCR.

2. Events for Individual Candidates. All candidates for office or their surrogates may be invited once during a primary election period and once again during the general election period. If a candidate running for one of these offices speaks at Brown, other candidates for the same office must be given the opportunity to speak in a comparable venue and similar timeframe.

3. Non-sponsored Events. Campaigns are welcome to rent meeting rooms and event spaces and, as such, are subject to the same rules, regulations and fees for all external users as set by the Conference Services Office. Advertising and publicity material should state that the event is not sponsored by Brown University, and all campaign-related activities must be contained within the rented venue or facility.

Approved appearances by candidates or their surrogates sponsored by University departments or campus groups may take advantage of campus promotional outlets provided the communications are designed to promote and support the event, but not the candidate.
IV. Fundraising and Gift Restrictions

Funds or contributions for political candidates or campaigns may not be solicited in the name of Brown University, and University resources may not be used in soliciting such funds. Political fundraising activities are prohibited on campus; this includes using University-issued electronic devices, materials and facilities to make contributions to political candidates and organizations. If Brown students, faculty or staff make political contributions, they do so as individuals and not on behalf of Brown.

Administrative officers, faculty, and staff, and any person or organization acting on their behalf may not solicit or accept funds or contributions for political candidates or campaigns (their own or someone else’s) from donors identified through donor rolls or other University records or directories.

V. Seeking Public Office

Faculty, staff, and students may decide to run for public office while at Brown. To ensure compliance with IRS regulations and University policy, including policies relating to conflict of interest and/or a conflict of commitment, a plan to manage potential conflicts must be established upon declaration of candidacy. Plans must ensure that other faculty, staff and students do not experience a compromised educational or work environment or feel pressure to comply with the political goals of candidates.

An employee intending to seek public office must inform his/her supervisor and the Dean of the Faculty or the Vice President for Human Resources to develop a plan to avoid conflicts of interest. It is requested that this notification come as soon as the employee is considering becoming a candidate, but, in all cases, notification must be made no later than immediately upon declaring candidacy. Students intending to seek public office must contact the division of Campus Life, again as early in the process as possible, but no later than the declaration of candidacy. Campus Life will then work with the student(s) and the appropriate University offices to develop an appropriate plan. Faculty, staff and students must also comply with federal, state and local statutes.

VI. Lobbying Rules

Members of the Brown community may lobby government officials regarding particular issues of interest to them on their own time. They must first consult with OGCR if they wish to lobby government officials in their capacity as a Brown faculty member, staff person or student. If it is determined that Brown should contact a city, state, federal or international official on a particular policy matter, such efforts must be coordinated through OGCR.

Due to federal, state and local lobbying laws, Brown must report any lobbying activities. Therefore, OGCR must be informed of all such activities conducted by Brown employees. Please see the below information on federal, state and city lobbying regulations and definitions.

(Federal) Lobbying Disclosure Act Guidance
(Rhode Island/State) Lobbying in Rhode Island
(Providence/City) Lobbyist Registration Information

Policy Owner Approved by Executive Vice President for Planning and Policy Assistant Vice President for Government and Community Relations
Office of General Counsel

Contact(s)
Steve Gerencser
Associate Director, Government Relations