**Guidelines for Students Involved in Political Activities at the University of Pennsylvania**

**Introduction**

The University of Pennsylvania is committed to achieving academic excellence, creating an environment for inquiry and learning, and cultivating responsible citizenship in our larger society. The freedom to experiment, to present and examine alternative data and theories; to hear, express, and debate various views; and to voice criticism of existing practices and values are fundamental rights that must be upheld and practiced by the University in a free society.

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 of Pennsylvania** is prohibited from participating or intervening in any political campaign on behalf of (or in opposition to) any candidate for public office. Violation of IRS regulations could have serious implications for the University, including loss of tax-exempt status.

The following guidelines describe permitted use and restrictions of University facilities and resources for partisan, politically related activity on campus by students and student organizations. These guidelines cannot address every potential situation. Questions regarding these guidelines should be addressed to the Office of Student Affairs (215-898-6533).

Penn reserves the right to amend or modify these guidelines at its discretion or as it deems necessary to comply with the regulations governing political activities of 501(c)(3) entities.

**Students and Student Organizations**

Penn students are involved in political events and activities on behalf of candidates for political office. Students are, of course, free to sponsor or participate in campaign-related activities as long as they do not use University resources. When engaging in partisan political activities, students should not imply that the **University** endorses or opposes any candidate for political office.

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 these guidelines, and applicable IRS regulations. No group, whether recognized or not, that plans to campaign for a particular candidate can receive an allocation from the Student Activities budget or other University funding to support events involving a single candidate or political issue. [NOTE that funding would be permissible for debates and other nonpartisan activities]

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

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

**Events Involving Political Candidates, Campaigns, and Other Prominent Figures**

The University may not—directly, indirectly, or in-kind—sponsor events involving current candidates or political campaigns where the purpose or effect is to support or oppose such candidate or campaign. This includes the publishing or distribution of statements.

Non-campaign Activities

Candidates for public office or designates are welcome to appear on campus for nonpartisan, 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.
* The campus event involving a candidate should not be dictated by, or put under the control of, a candidate, his or her representatives, or any outside organization.
* Any such event must be open to the University community without preference based on political affiliation.
* 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 Office of Student Affairs.

Educational Activities

Penn is permitted to sponsor certain educational activities that may involve political figures and issues. IRS regulations provide that in order to be considered “educational,” activities must present “a sufficiently full and fair exposition of the pertinent facts.” The presentation of information must not be biased and must “permit an individual or the public to form an independent opinion or conclusion.”

The University may provide forums for candidate debates, provided those events offer a fair and neutral framework and provide equal time to all qualified candidates. Arrangements and formats for such debates must be reviewed and approved by Penn’s Office of Government and Community Affairs.

A Penn student group may sponsor educational events involving political candidates or groups, with the following guidelines:

1. The event should relate to the University's educational purposes.
2. The candidate or participants should be cautioned in writing not to treat the event as a campaign function.
3. The student group must offer a conspicuous disclaimer that the event does not signify the University's support for or opposition to a candidate or party.
4. The student group must offer a similar opportunity to other candidates or political parties.
5. The University must prohibit any fundraising at the event.

A disclaimer must be made (preferably by a University representative) at the introduction that the University does not support or oppose any candidate or any political party and the views expressed are not those of the University. It should also indicate that the political presence at the University does not, in any way, constitute affiliation, agreement or disagreement with such political affiliation. Penn banners and other marks should be removed from the event site to avoid the possibility of campaign/publicity photos including them, thereby suggesting an affiliation or support of the group.

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.

For guidance on how to organize an event involving a political figure or theme, contact the Office of Student Affairs (215-898-6533).

Independent, Non-sponsored Events

Candidates and campaigns are always welcome, as space allows, to host independent, non-sponsored events on campus. Campaigns may reserve and rent meeting rooms, event spaces, and other venues and equipment, subject to the same rules, regulations, and fees for all external users as set by the campus venue. Advertising and publicity material should state that the event is not sponsored by Penn, and all campaign-related activities must be contained within the rented venue or facility.

Penn student groups may also sponsor independent events involving political candidates or groups, provided the following:

1. No fundraising will be conducted as part of the event;
2. No voter registration will be conducted as part of the event, unless voter registration is conducted for all parties. However, an announcement referencing opportunities for voters to register may be made at the event.
3. No University stationery, signs, logos, or other marks will be visible at the event in ways that might imply the University’s support.

For independent events, the sponsoring Penn student group would be subject to the same rules, regulations, and fees for all external users as set by the campus venue. Under no circumstances may groups supporting candidates use University space to establish a campaign headquarters nor can such groups be assigned permanent office space.

**Nonpartisan Activities**

Penn does not 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.

**Fundraising and Gift Restrictions**

Funds or contributions for political candidates or campaigns may not be solicited in Penn’s name. University resources, including Penn email or web resources, may not be used in soliciting such funds. Fundraising activities are prohibited on campus. If Penn students make political contributions, they do so as individuals and not on behalf of Penn.

**Seeking Public Office**

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

Students intending to seek public office must contact the Office of Student Affairs as early in the process as possible but no later than the declaration of candidacy. Student Affairs will then work with the student(s) and the appropriate University offices to develop an appropriate plan.

**Lobbying Rules**

There are lobbying laws regulating contacts with federal, state, and city government officials that require the University of Pennsylvania to file official reports regarding communication and expenditures for the purpose of persuading action on legislation or public policy.

Members of the Penn community may lobby government officials regarding particular issues of interest to them on their own time. Anyone wishing to participate in a lobbying campaign in their capacity as a Penn student, faculty member, or staff member must first consult with the Office of Government and Community Affairs.

Lobbying is defined differently and reporting requirements vary at each level of government. Therefore, contact OGCA (215-898-1388) for additional guidance on compliance with lobbying disclosure laws.

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