



Guidelines for Communication with Federal and State Public Officials and Political Activity on Campuses

Communication with Federal and State Public Officials

Coordinating our government relations efforts is essential to maintaining professional working relationships with public officials, keeping CSCU messages coherent and effective, and ensuring compliance with all state and federal laws. To that end, communication with any state or federal elected officials or their staff must be coordinated with the CSCU Director of Government Relations, Alex Beaudoin at PilonA@ct.edu or 860-723-0017 or 860-670-4021.

This two-way communication is essential to maximizing our outreach efforts. For example, a legislator may request a meeting about a program or initiative on campus to learn more about it. Without any coordination, the campus officials may not know that legislator is proposing legislation to defund or expand that program, and the CSCU Director of Government Relations may not know the legislator visited the program when lobbying them on the bill.

Proactive coordination in these instances helps to better manage both the individual campus outreach and the wider system efforts. Additionally, this also helps ensure compliance with all state and federal lobbying disclosure laws.

Such contacts may include, but are not limited to: individual or group meetings; testimony before executive or legislative bodies; presentation of written materials or electronic transmissions; invitations to visit campuses; and responses to requests for information.

Political Activity on Campus

As public institutions, CSCU institutions and foundations receive tax exempt status under either section 115 or 501(c)(3) of the Internal Revenue Code. In order to maintain this status, the institutions must not participate or intervene in any political campaign and must prevent its resources from being used in any way that could appear to support a political candidate.

CSCU Community Members are free to participate in political activities on the national, state, or local level such as running for political office, managing political campaigns, and assuming leadership roles in political organizations, provided that the participation does not prevent full discharge of their obligations to their institution. However, in any such activities, it must be made clear that the individual is acting as a private citizen and is in no way representing CSCU.

Political events (fundraisers, rallies, candidate announcements, etc.) are permitted on the campus as long as they are sponsored or hosted by registered student organizations and all expenses related to the activity (including fees to cover space rental) are borne by the candidate, political organizations or student organizations. Institution facilities may be rented for political events in accordance with campus policy on facilities use. Such sponsored events may not be “subsidized” or otherwise supported by CSCU or an Institution.

It is important to note that these guidelines apply explicitly to the use of public resources in support of “political campaign activities”. They are not intended to limit discussion among scholars and others regarding political or campaign issues or candidates.

PERMISSIBLE ACTIVITIES

1. Voter Education

CSCU institutions are permitted to conduct voter education activities as long as they are carried out in a non-partisan manner. For example, conducting public forums, get-out-the-vote drives, and the publication of voter education guides that cover a wide range of issues are allowed as long as the activities are not conducted in a biased manner that favors or opposes a single candidate or issue.

2. Candidate Appearances

A. Invitations and Events: Institution Sponsored

1. Political candidates may be invited to speak at events, including classroom visits and debates. These events are to be educational in nature and offered for that purpose in conjunction with the Institution’s public education mission.
2. If one candidate is invited to speak at an event, the Institution must provide all legally-qualified candidates or their representatives an opportunity to appear either at the same event or at a comparable event within a reasonable time period. Evidence of invitations and responses must be kept on file. If an invited candidate fails to respond after multiple invitations to the event, such should be noted in the file along with the invitations issued. *[An exception may be made for an elected official who is simultaneously a candidate for office, so long as the remarks are limited to official business related to the duties of the elected office.]*
3. The Institution may not co-sponsor a campaign event with an Outside Entity. The term “Outside Entity” refers to a candidate, campaign or political organization, not-for profit, and any other outside group.
4. The introduction of a candidate or the candidate’s representative at an Institution-sponsored event must be neutral and include a brief statement that the Institution or CSCU does not endorse or oppose any candidate or organization in connection with this or any other political campaign or election. In cases where the individual candidates will appear in a conversational dialogue about issues, each candidate will have the same format of question or topic presentation; same topics in both substance and number; same amount of time for discussion; same moderator for the event; and same physical setting or staging. Appropriate steps must be taken to avoid the appearance of the Institution’s endorsement of or opposition to any candidate.
5. All expenses related to an event conducted pursuant to this section shall be borne by the sponsoring Institution.
6. Political fundraising at Institution-sponsored events is **strictly** prohibited.

B. Invitations and Events: Student Organization Sponsored

1. "Student organization" refers to any CSCU student group that is recognized in accordance with any Institution specific policies or practices.
2. A student organization may conduct a single-candidate or single-party event pursuant to this section; however, if any funding used to pay for the event originated from the CSCU or an Institution, the student organization must invite all legally-qualified candidates to participate in the event.
3. A student organization may hold a meeting or event that is closed to the general public and limited to student organization members in which case the student organization sponsored event will be subject to the normal fees assessed to a student organization for facility rental and usage fees, if applicable.
4. If the event is open to the general public, the student organization's advisor or designee must be present at the event for the duration of the event, and the student organization must include a brief statement when introducing the candidate or the candidate's representative that the Institution does not endorse or oppose any candidate or organization in connection with this or any other political campaign or election. The student organization sponsored event will be subject to the normal fees assessed to a student organization for facility rental and usage fees for public gatherings, if applicable.
5. Appropriate steps must be taken by student organizations to avoid the appearance of the University's endorsement of or opposition to any candidate.

C. Invitations and Events: Sponsored by Outside Entities

1. Outside Entities may rent space on Institution Property to host political events, which may be either limited audience or general public events.
2. An event sponsored by an Outside Entity shall be subject to normal charges assessed to Outside Entities renting space with no discounts, preferential scheduling or other gratuities, or free or reduced rates for related services (such as security, sound systems, parking, broadcasting or web services, etc.).
3. No exceptions to facility rental practices shall be made for a candidate or political party. Candidates or parties may rent only those Institution facilities that are regularly available for rent.
4. If facilities are rented to one candidate or political party, the same or similar facilities must be made available for rent to all others on equal terms and conditions, subject to any limitations on availability of particular facilities, due to the scheduling of other events, at the time a candidate or party makes a request.
5. Outside Entities that conduct events pursuant to this section shall take appropriate steps to avoid the appearance of the Institution's endorsement of or opposition to any candidate.

PROHIBITED ACTIVITIES

1. Endorsements
Institutions must not expressly or impliedly endorse any candidate for public office. In this regard, it is extremely important that Community Members refrain from using State provided email or other communication tools for personal discussion of or advocacy on behalf of a candidate.
2. Political fundraising
Political fundraising utilizing Institution Property or through the use of the Institution's technology resources, including but not limited to Institution email accounts, is prohibited. Individual University email accounts, campus mail, and University social media accounts may not be used by Community Members to urge financial support of a particular candidate or to invite others to political fundraisers, whether hosted/sponsored by the candidate or by others in support of the candidate.
3. Distribution of campaign materials
Community Members may not use Institution email, campus mail, and Institution social media accounts to forward or otherwise distribute messages, invitations, solicitations, or campaign literature from or on behalf of a candidate or political party.
4. Student organizations shall not use any funding that originated from Institution funding on behalf of a candidate for public office or in a political campaign.

DEFINITIONS

Community Members: Any employee of the CSCU, including administrators, faculty, staff, temporary, and student employees; all institutions; any individual using institution or CSCU resources or facilities or receiving funds administered by the State; and volunteers and other representatives when speaking or acting on behalf of CSCU or any of its composite institutions.

Institution Resources: Include but are not limited to the Institution's name, logo, or other identifying mark; the Institution's funds, facilities, office supplies, photo equipment, letterhead, telephones, fax machines, and computers; and the Institution's information technology resources such as email, websites, and on-line discussion boards. Institution resources does not include student activity funds.

Institution Property: Buildings, grounds, and land that are owned by the CT Board of Regents for Higher Education or controlled by the Connecticut State Colleges and Universities via leases or other formal contractual arrangements to house ongoing CSCU operations.

Outside Entity(ies): Candidates, campaign or political organizations, not-for profits, and all other outside groups.

Student Organization: A student group that is recognized in accordance with any CSCU Institution specific policies or practices.

University Sponsor: An Institution campus, school, department, or unit.

FACULTY AND STAFF POLITICAL / CAMPAIGN ACTIVITY
FREQUENTLY ASKED QUESTIONS

CSCU encourages all faculty and staff to fully and freely exercise their constitutional right to vote, as well as express their personal opinions regarding candidates and issues. These rights, however, must be exercised in such a manner as to ensure that CSCU is not endorsing a candidate or cause. The following frequently asked questions provides some guidelines about permissible political and campaign activity. For more information, contact the Office of Legal Affairs.

What defines “political or campaign activity”?

Political or campaign activity is activity that includes fundraising for a candidate or ballot measure, advocating for or against a political candidate or ballot measure, and performing work for a candidate, ballot measure or political party. If you are not sure whether something is political or campaign activity, please contact the Office of Legal Affairs.

What are the rules?

There are two general rules that need to be followed:

1. Institutions may not participate in political / campaign activity. Therefore, care must be taken to ensure that personal political/campaign activity does not suggest that an Institution is participating in political / campaign activity; and
2. No institution resources may be used for political / campaign activity.

Institution resources include, but are not limited to:

- Institution letterhead and logos;
- Office supplies;
- Office space and other facilities (please see question below on use of campus facilities for political events);
- Photocopiers, telephones and faxes;
- Email, institution websites, etc.; and
- Employee work time.

May I give my class assignments related to the election?

Yes. You may establish curricular activities aimed at educating students about the political process. However, you may not use a class assignment to influence your students in favor or against a particular candidate / ballot measure.

May my office/department conduct a voter registration drive?

Yes. Your office or department may sponsor a non-partisan voter registration drive. The activities and location of the drive must not target voters of a particular party or help a particular candidate.

May I endorse a candidate?

Yes, but care must be taken to make sure that your endorsement is not seen as endorsement by your institution or CSCU. If an endorsement identifies you using your Institution title, you must seek to clarify that use of your name does not indicate endorsement by your institution.

May I sign a petition in support of an issue/candidate?

Yes, but only outside of working hours and away from your institution.

May I distribute flyers about a candidate/ballot measure?

Yes, but you may only distribute flyers outside of working hours and while away from your institution. You should not distribute flyers to, or otherwise solicit votes from your students or anyone who works for you.

May I host a fundraiser for a candidate?

Yes, but you may only host a fundraising event, or take any action in connection with the fundraising event, outside of working hours and away from your Institution. You may not invite, or otherwise solicit contributions from, your students or anyone who works for you.

May my institution host a town hall or other constituent focused gathering for an elected official?

Yes, you may host a Town Hall or other constituent focused gathering for an elected official, however the elected official should execute a Facilities Use Agreement and providing supporting insurance documentation and customary charges, if appropriate.

May I or my department invite a political candidate to campus?

You or your department may invite a candidate to campus in one of the following ways:

1. As part of a debate or candidate forum in which all legally qualified candidates are invited and given equal opportunity to speak; or
2. In a non-candidate capacity, where the individual was chosen to speak for reasons other than his or her candidacy and where no campaign activity is conducted, or reference to the election is made.

You may also invite a candidate to campus in your individual capacity, however you must adhere to the same requirements that members of the general public do, including executing a Facilities Use Agreement and providing supporting insurance documentation and payment, if applicable. In order to avoid confusion, invitations and other material related to the event must include the following disclaimer:

This event is sponsored by _____. The use of Northwestern Connecticut Community College facilities for this event does not constitute an endorsement Northwestern Connecticut Community College or the Connecticut State Colleges and Universities. Neither the Connecticut State Colleges and Universities nor Northwestern Connecticut Community College endorses any candidate or ballot measure in this or any other election.

May the student organizations invite a political candidate to campus?

The student organizations may invite a candidate to campus and invite the CSCU community, so long as it reserves campus facilities in the same manner that student organizations usually do. Because of the student organization's affiliation with the institution, invitations or other material must include the following disclaimer:

This event is sponsored by_____. The use of Northwestern Connecticut Community College facilities for this event does not constitute an endorsement Northwestern Connecticut Community College or the Connecticut State Colleges and Universities. Neither the Connecticut State Colleges and Universities nor Northwestern Connecticut Community College endorses any candidate or ballot measure in this or any other election.

May my office/department host a fundraiser for an issue/candidate?

No.

Can I put political bumper stickers on my car?

If you are driving a state funded vehicle, no. You may do what you wish with your own property as long as it does not disrupt the institution.

Dated 9/13/2017 revised 08/07/2020