

## **Student Lobbying, Political and Campaign Activities Policy**

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### **Philosophy**

In keeping with its educational and service mission, and its desire to promote discussion of and participation in political and civic issues, Xavier University encourages and supports the involvement of students in government and political affairs. However, lobbying and political campaign-related activities are limited by policies and practices that must be followed in accordance with the Internal Revenue Code and Federal Election Commission regulations.

Xavier University is a private non-profit educational institution and is governed by Section 501(c)(3) of the Internal Revenue Code. Consistent with this section of the Internal Revenue Code, Xavier University may not participate, directly or indirectly, in any political campaign on behalf of or in opposition to any candidate for public office. Xavier students and recognized student organizations may, however, participate in political activities as described in these policies, or as otherwise permitted by the Internal Revenue Service. Within these restrictions, Xavier University provides an academic environment which encourages free expression and civic discourse in order to enrich and invigorate the educational experience for all members of the campus community.

***The scope of this policy is limited to students and student organizations. Lobbying and political activities concerning faculty and staff are addressed in a separate policy.***

### **Policy**

Individual Xavier students, recognized student organizations, and students engaged in class assignments have the opportunity to participate in certain kinds of lobbying or political campaign-related activities. Prior to participating in any such activities, students and/or recognized student organizations should contact the Office of Student Involvement to ensure their planned activities fall within these and other University policies and guidelines. The Student Handbook and all other applicable University policies and procedures continue to apply for any such activities.

Supervision of students and student organizations engaging in political activities is vested, in the first instance, in the Assistant Vice President for Leadership & Engagement, who shall consult with the Director of Government Relations in case of questions involving the implementation or interpretation of these policies.

Students are encouraged to express their individual and collective political views provided they understand and make clear they are not speaking for or in the name of Xavier University. In so doing, each individual should make it clear that any references to his or her membership in the University community is for identification purposes only, and he or she is not acting on behalf of or speaking for, or with the endorsement of, the University.

### **Specific Activities**

The following is a list of common types of lobbying and political campaign-related activities in which recognized student organizations and students engaged in a class project may participate. This list is not meant to be comprehensive, but should provide examples of the types of activities that may be permitted. All activities are subject to interpretation by the Assistant Vice President for Leadership & Engagement, in consultation with the Director of Government Relations.

#### **1. Elected Officials and Candidate Appearances, Forums, Debates**

- a. Recognized student organizations may receive permission to provide speaking opportunities to public or elected officials or verified candidates for public office.
- b. The appearance of a public or elected official or candidate for office should be for an educational or informational talk to the University community and must be sponsored by a recognized student organization. All such appearances must be approved at least two weeks in advance through the Office of Student Involvement, in consultation with the Director of Government Relations, and in accordance with the Student-Invited Speakers Policy. Such appearances shall be limited to speeches, question-and-answer sessions or similar communications in an academic setting and are not to be conducted as campaign rallies or events.
  - i. Public or elected officials who are actively campaigning for elected office are not eligible to participate in a student-invited speaker event. The active campaign period includes the 3-month window prior to an official election.
  - ii. Invited speakers are not permitted to bring campaign related materials to any speaking engagements.
- c. Recognized student organizations may receive permission to host public forums or debates with public officials and/or legally qualified candidates for a public office (or for the nomination of a particular party) as long as all legally qualified candidates are invited and given equal access and opportunity to speak.
- d. The Chief of Police/Director of Public Safety should be consulted to determine appropriate security coverage for any state or federal public or elected official invited to campus.
- e. Recognized student organizations are not permitted to use University or student activity fee dollars in support of clearly partisan speeches or candidate appearances. Note: Students, recognized student organizations, or students engaged in a class project are not permitted to pay a candidate for public office for a speaking engagement or appearance.

## **2. Candidate Endorsements and Campaigning**

- a. Students, recognized student organizations, or students engaged in a class project may endorse a political party, candidate for public office, and/or take a position on a ballot issue. If the institution is identified, it should be communicated any endorsements, positions, or opinions do not reflect the views of Xavier University.
- b. Students, recognized student organizations, or students engaged in a class project may participate in off-campus campaign-related activities for a candidate for public office, political party, or ballot issue.
- c. Students, recognized student organizations, or students engaged in a class project may not place signs or other such fixed exhibits (such as ribbons, flags, banners, or other items) on university property that support or critique a particular candidate for public office, political party, or ballot issue. Policies related to residence hall rooms and apartments are available from the Office of Residence Life.
- d. Students, recognized student organizations, or students engaged in a class project may not engage in on-campus solicitation for or against a particular candidate for public office, political party, or ballot issue.
- e. Recognized student organizations or students engaged in a class project may host events or activities in support of a political party, candidate for public office, or ballot issue. Such activities shall not interfere with the rights of others or with other University functions.

## **3. Fundraising**

- a. Recognized student organizations or students engaged in a class project may not engage in fundraising activities in support of a candidate for public office, political party or ballot issue, nor may student organizations donate directly to a candidate for public office, political party, or ballot issue.
- b. Students, student organizations or students engaged in a class project may not solicit funds or contributions for public officials, candidates for public office, political parties, or ballot issues in the name of Xavier University.

## **4. Use of University Facilities**

- a. Recognized student organizations may receive permission to use available University facilities for partisan and/or non-partisan political purposes, provided that such organizations make the necessary arrangements with appropriate University officials; pay the normal costs, if any, for such use (including any increased security costs); and recognize their obligation to abide by all applicable University rules and regulations.
- b. Announcements or advertisements for All events using University facilities must clearly indicate the following:
  - i. The name of the sponsoring organizations;
  - ii. Xavier University does not support or oppose candidates for public office OR particular issues;
  - iii. The opinions expressed are not those of Xavier University.
- c. Such announcements shall be made in all marketing and communication materials, and at the beginning and end of an event.

## **5. Use of University Resources**

- a. University resources (including email/mail distribution, email/mailling lists, scans, photocopying, orders through FedEx office account, websites, social media, student organization mailboxes, etc.) may not be used by or on behalf of an outside organization or outside individual whose purpose is to further the cause of a candidate for office, a ballot issue, or a political party. To the extent such services are available for purchase by non-Xavier customers; they may be purchased at the prevailing rates by candidates or parties. No University office (including student organization mailboxes) should be used as a return address for partisan or non-partisan political mailings.
- b. Neither Xavier University's name, nor Xavier University insignia/logo may appear on any material used or intended for partisan and/or non-partisan political purposes. Recognized student groups should insure that any digital and social accounts that utilize the University's name or logo, should include the following language with any promotion involving a candidate for public office or issue: "The activity does not have the endorsement of Xavier University."
- c. Students and/or recognized student organizations are not permitted to use University or student activity fee dollars in support of clearly partisan activities. For questions about student activity fee use, consult with the Assistant Vice President for Leadership & Engagement in the Office of Student Involvement.

## **6. Voter Education and Registration**

- a. All campus voter registration drives must be conducted in a non-partisan manner.
  - i. Voter registration activities are subject to the requirements of the Hamilton County Board of Elections.
  - ii. Voter registration activities should not include the presence of a candidate for office or a representative of their staff or campaign organization.
  - iii. The student organization may be identified.
  - iv. No campaign or issue-based materials are permitted in the area where the drive is being conducted.
  - v. All voter registration materials and links should connect to nonpartisan sites.
- b. Recognized student organizations or students engaged in a class project may conduct training programs designed to increase public understanding of the electoral process or to encourage citizens to become involved in the process.
- c. Recognized student organizations or students engaged in a class project may circulate questionnaires or conduct public opinion polls. Such activities should not be skewed to the advantage or disadvantage of individual candidates, political parties, or ballot issues.

## **7. Voter Transportation**

- a. Recognized student organizations may provide transportation for student voters to polling locations. Such transportation must be available for any eligible student voter, regardless of political affiliation or interest.

## **Approval Process**

Recognized student organizations must register their lobbying or political campaign related activity with the University through the Office of Student Involvement. Individual students should consult with the Assistant Vice President for Leadership & Engagement regarding the appropriate protocol.

## **Violations of Policy**

Violation of this policy may result in the following actions taken singularly or in combination:

- Immediate termination of the event
- Payment for any labor, repair, or replacement costs incurred because of the violation
- Forfeiture of the use of the space for a stated period of time
- Alleged violations may be referred to the Dean of Students, Vice President for Student Affairs, and/or designee.

## **Policy Review and Amendment**

This policy is subject to annual review and amendment based on suggestions received during the year. When conditions warrant, a review committee may be called together to develop recommendations.

## **Contact**

Please contact the Assistant Vice President for Leadership & Engagement in the Office of Student Involvement with any questions.