Contact with State Officials, Federal Officials, and Political Campaigns, and Other Political Activities
GR-01

About This Policy

Effective Dates:
06-15-2016

Last Updated:
01-05-2020

Responsible University Administrator:
Vice President for Government Relations

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Scope

This policy applies to the following Indiana University Community Members (“IU Community Members”):

1. Any employee of the university, including administrators, academic appointees, staff, temporary, and student employees;
2. All students and student organizations;
3. All university units;
4. Any individual using Indiana University resources or facilities or receiving funds administered by Indiana University; and
5. Volunteers and other representatives when speaking or acting on behalf of Indiana University.

Policy Statement

1. As reflected in UA-14, The First Amendment at Indiana University, the university recognizes the right of IU Community Members to personally engage in partisan political activities, partake in public policy debates, and voice their opinions. This includes, but is not limited to: voting, participating in public discourse, writing published opinion pieces, and contacting government officials. However, these personal activities must not prevent the full discharge of an employee’s staff or academic responsibilities. Likewise, all IU Community Members are expected at all times to distinguish between when they speak, write, or act in their personal capacity (including when they speak, write, or act on behalf of professional societies and other organizations) and when they speak, write, or act on behalf of the university’s interests.

2. As a public institution, Indiana University receives tax exempt status under the Internal Revenue Code. In order to maintain this status, the university shall 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. University trademarks may not be used by candidates for elected office or by IU Community Members in a way that would create a perception of Indiana University support for a particular candidate or political party.

3. Any personal contact with government officials or governmental agencies shall only be done in an individual capacity or on behalf of a professional society. Indiana University resources must not be used when engaging in personal political activity. These resources include, but not limited to: letterhead, electronic resources (including but not limited to email), stationery supplies, and university-owned electronic hardware.
4. Individual university titles (such as an academic title) may be utilized as an identifier or to lend personal credibility. However, special care must be taken to clarify that any such communication is still being made in the individual’s personal capacity and that the individual is not speaking on behalf of the university. This is especially relevant for public oral statements, written/electronic communications, and publication bylines.

5. It is highly recommended that university departments and units identify and appoint a single point of contact that is responsible for coordinating with the Office of the Vice President for Government Relations and Economic Engagement on the implementation of this policy. This can help facilitate notice requirements, lobby reporting compliance, and discussions about appropriate political activity. If a point of contact is established, the individual’s name, position, and contact information shall be communicated to the Office of the Vice President for Government Relations and Economic Engagement.

6. This policy is not intended to limit the personal rights of IU Community Members to contact and engage with federal, state, or local officials on matters of personal belief or opinion, or to donate to political campaigns or causes as an individual. Similarly, this policy is not directed towards contacts made on behalf of a professional society, as long as that representation is not in the name of Indiana University.

7. Indiana University encourages IU Community Members to exercise their constitutional right to vote, to actively participate in the political process, and to express their opinions regarding local, state, and national political candidates, issues, and referendums.

**Reason For Policy**

This policy has been established to provide guidelines and procedures pertaining to 1) communication and contacts with government officials and 2) participation in campaign and other political activities by IU Community Members. This policy is designed to ensure compliance with legal requirements of the Internal Revenue Code, which allows Indiana University to maintain tax exempt status, and applicable state and federal lobbying laws, but requires the university not to participate or intervene in any political campaign, and to prevent university resources from being used in any way that could appear to support a political candidate.

**Procedure**

1. Interpretation and Implementation
   a. The Office of the Vice President for Government Relations and Economic Engagement (GREE) holds the authority for the interpretation and implementation of this policy.
   b. All events that involve candidate appearances must be planned and executed in accordance with UA-19, Event Management, particularly with regard to the evaluation of whether the event requires extensive logistical, safety, and security planning.
   c. GREE and the campus Vice Provost/Chancellor for external affairs shall be notified by IU Community Members of all requests for political campaign invitations and events in order to ensure proper communication within the university.

2. Communication and Contact with Government Officials
   a. GREE is the sole office charged and empowered with the responsibility of providing leadership for Indiana University’s governmental relations activities. Coordination with GREE is essential to maintaining professional working relationships with public officials, keeping the university’s messaging coherent and effective, and ensuring compliance with relevant and applicable laws.
   b. Prior to contacting or communicating with any government official or agency on behalf of a university interest, a department, unit, or individual must coordinate with GREE. Contacts requiring coordination with GREE 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
• Campus events that include government officials, candidates for office, and state and federal political appointee
• Responses to requests for information
• Contracts with state entities, including but not limited to the Indiana Secretary of State, Indiana Economic Development Commission, Indiana Utility Regulatory Commission, and the Indiana Department of Health.

c. Special Considerations for Contact with Federal Officials
1. Indiana University is listed as a lobbying registrant with the U.S. House of Representatives and the U.S. Senate. As a lobbying registrant, federal law requires the university to report each quarter on its federal lobbying activities, such as contacts with certain federal elected and appointed officials and the reason for such contacts.
2. In order to ensure compliance with federal law and regulations, any proposed outreach on behalf of a university interest to covered federal officials, including all members of Congress and all congressional staff, must be coordinated with the IU Office of Federal Relations before the contact is made.
3. Only IU personnel authorized by GREE to lobby on behalf of or represent Indiana University’s interests with the above federal officials.
4. This section of the policy is not intended to limit the personal rights of IU Community Members to contact federal officials for their personal beliefs and issues, nor is it directed toward those contacts made on behalf of their professional societies as long as that representation is not in the name of Indiana University.

3. Direct Participation in Political Activities by Individual IU Community Members
a. IU Community Members shall be 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 the university. If such participation does prevent full discharge of the individual’s obligations to the university, the individual will be required to request a leave of absence for the period of the activity.

b. In any such activities, it must be made clear that the individual is acting as a private citizen and is in no way representing the university.

c. An academic appointee who proposes to engage in political activities involving substantial time commitment shall be required to inform the departmental chair, the school dean, and the campus Vice Provost/Chancellor for academic affairs.

d. Academic appointees who are otherwise entitled to a Faculty Board of Review may utilize that process to appeal a decision by an administrator that the academic appointee must take a leave.

e. All other, non-academic employees who propose to engage in political activities involving substantial time commitment shall be required to comply with the IU Human Resources Policy on Political Activity and shall inform GREE, which will consult with the employee’s unit.

4. Events and Invitations in General

a. If an event includes an appearance by, or an invitation to, a government official, candidate, or political party, the sponsor of the event must notify GREE to ensure that the requirements of this policy are strictly observed.

b. No invitations to a government official, candidate, or political party may be issued by an individual, department, or unit, without prior notification and coordination with GREE.

5. Voter Education Activities and Events
IU Community Members are permitted to conduct certain voter education activities as long as they are carried out in a non-partisan manner. For example, conducting public forums, non-partisan 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 political party.
6. Appearances by Government Officials, Candidates, and Political Parties

a. Invitations and Events: University Sponsored

1. Elected officials, state and federal government appointees, and political candidates may be invited to speak on campus, including classroom visits. These events must be educational in nature and offered for that purpose in conjunction with the university’s public education mission.

2. For candidate events: If one candidate is invited to speak at an event, the university 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. If the government official makes partisan remarks beyond the duties of the official’s elected office during the event, then all legally-qualified candidates or their representatives must be offered an opportunity to appear at a comparable event within a reasonable time period.

3. The introduction of a candidate, government officials, or political party at a university-sponsored event must be neutral and must include a brief statement that the university does not endorse or oppose any candidate, party, 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 university’s endorsement or opposition to any candidate, elected official, or political party.

4. The university may not co-sponsor or share the cost of a campaign event with an external entity. The term “external entity” refers to a candidate, campaign, party or political organization, not-for profit, and any other outside group. An external entity may independently sponsor an event under Paragraph 3. below.

5. All expenses related to an event conducted pursuant to this section shall be borne by the sponsoring university unit(s).

6. Political fundraising at university-sponsored events is strictly prohibited.

b. Invitations and Events: Student Organization Sponsored

1. “Student organization” refers to any student group that is recognized in accordance with any Indiana University and/or campus-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 Indiana University, the student organization must invite all legally-qualified candidates to participate in the event and follow the provisions of Paragraph 1.b. above.

3. A student organization may hold a meeting or event that is closed to the general public and limited to student organization members.

4. A student organization sponsored event will be subject to the normal fees assessed to a student organization for facility rental and usage fees, if any.

5. If the event is open to the general public, the student organization must have a university sponsor for the event. Facility rental and usage fees must be charged. Invitations to any event that is open to the general public must be extended to all legally-qualified candidates, and follow the provisions of Paragraph 1.b. above.

6. Political fundraising at student organization sponsored events, whether open or closed to the public, is strictly prohibited.
7. Appropriate steps must be taken by student organizations to avoid the appearance of the university’s endorsement of or opposition to any candidate or party.

c. Invitations and Events: Sponsored by External Entities

1. External entities may rent or reserve space on university property to host political events, which may be either limited audience or general public events.

2. An event sponsored by an external entity shall be subject to normal charges assessed to external 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. If third party vendors are used for a political event on campus, external entities must directly pay the vendors for services rendered. Indiana University and IU Community Members may not pay the vendors and seek reimbursement from the external entity.

4. No exceptions to facility rental or reservation practices shall be made for political events. External entities may rent or reserve only those university facilities that are regularly available for rent or reservation. If the facility normally has a rental fee, the fee cannot be waived. If a facility can normally be reserved without a rental payment, then external entities may reserve it without paying a rental fee.

5. If facilities are utilized by one candidate or political party, the same or substantially similar facilities must be made available to all other legally qualified candidates or political parties on equal terms and conditions, subject to any limitations on availability due to the scheduling of other events at the time a candidate or party makes a request.

6. External entities that conduct events pursuant to this section shall take appropriate steps to avoid the appearance of the university’s endorsement of or opposition to any candidate.

7. Political fundraising at events sponsored by external entities is strictly prohibited.

7. Prohibited Activities for Indiana University and IU Community Members

Maintaining Indiana University’s tax status is of the utmost importance to the university, and sensible judgment and due diligence should be exercised in arranging any activity that involves political activity. The following is a non-exhaustive list of activities that must be avoided in order to protect the university’s tax status:

a. The university shall not endorse any candidate for public office. In this regard, IU Community Members may not use the university’s electronic resources (including email) for advocacy on behalf of a candidate or political party. Personal political communications must be clearly identified as the individual IU Community Member’s personal views and not those of the university.

b. Hyperlinks to the websites of candidates or political parties shall not be placed on any university website in any manner that favors one candidate or political party over another, except in the course of the legitimate teaching, research, or service activities of an academic appointee (e.g., a political science class on third-party candidates; a Media School research project).

c. Political fundraising on university property or through the use of the university’s technology resources is strictly prohibited. Individual University email accounts, campus mail, and university social media accounts may not be used by individual IU Community Members to urge support of a particular candidate or to invite others to political events or fundraisers, whether hosted/sponsored by a candidate or political party or by others in support of a candidate or political party.

d. IU Community Members may not use university email, campus mail, and university social media accounts to forward or otherwise distribute messages, invitations, solicitations, or campaign literature from or on behalf of a candidate or political party.

e. The name of the university, any trademark, logo, and/or image depicting landmarks of the university, must not be used in connection with political candidates or partisan political activities. Student organizations are permitted by Indiana University’s Student Organization Policy (STU-01) to use the approved university student organization marks for their campus; however, student organizations may not alter their official logo to incorporate candidate information.
f. Student organizations shall not use any funding that originated from Indiana University on behalf of a candidate for public office or in a political campaign.

Definitions

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

**University Property:** Buildings, grounds, and land that are owned by Indiana University or controlled by Indiana University via leases or other formal contractual arrangements to house ongoing IU operations.

**Indiana University Community Members:** Any employee of the university, including administrators, academic appointees, staff, temporary, and student employees; all students and student organizations; all university units; any individual using Indiana University resources or facilities or receiving funds administered by Indiana University; and volunteers and other representatives when speaking or acting on behalf of Indiana University.

**Student Organization:** A student group that is recognized in accordance with any university and/or campus specific policies or practices.

**University Sponsor:** A university campus, school, department, or unit.

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

Sanctions

Violations of university policies, including the failure to avoid a prohibited activity or obtain required approvals, will be addressed in accordance with applicable university policies and procedures.

History

GR-01 was originally established in 2016 to combine then-existing guidelines from the IU Office of Government Relations, now the Office of the Vice President for Government Relations and Economic Engagement, and ACA-36, Contacts with Federal and State Government Officials and Agencies for Academic Appointees. ACA-36 was rescinded when GR-01 was established.

In 2019, university policies related to university government relations and political activities (formerly GR-01, Contact with Federal and State Government Officials and ACA-02, Political Activities) were updated and consolidated into GR-01, Contact with State Officials, Federal Officials, and Political Campaigns, and Other Political Activities.

Related Information

- GR-02, Political Activities
- Federal Lobbying and Ethics Rules & Regulations
- ACA-29 Conflicts of Commitment Involving Outside Professional Activities for Academic Appointees
- ACA-34 Political Activities of Academic Personnel
- HR-07-50 Political Activity
- STU-01 Student Organizations
- FIN-LT-01 Licensing and Trademark Policy
- IT-01 Appropriate Use of Information Technology Resources
- UA-14, The First Amendment at Indiana University
- UA-19, Event Management