



# Political and Election Activity and Legislative Advocacy

Policy CR003

Volume 3, Communication and External Relations

Responsible Administrator: Vice President for Communication and External Relations

Responsible Office: Communications and External Relations

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## Policy Statement

College political and election activity, as well as legislative advocacy, are regulated by city, state, and federal laws, and college policies. FIT's policy provides clear guidelines for these activities and adheres to the college's commitment to the principle of free speech. All members of the FIT community are subject to this policy, as well as internal and external users of FIT's facilities.

## Reason for the Policy

FIT has developed and adopted a policy concerning political, election, and legislative advocacy activities in order to preserve free speech and avoid the penalties for improper political, election-related, or legislative activity by and at the college from a member of the college community, or by a person or group representing the college in an official capacity. Such penalties could include loss of the institution's tax-exempt status, imposition of taxes on the institution and its college officials, and other risks including federal, state, or local government lawsuits, audits, and investigations. In addition, any activity interpreted as partisan can damage the college's non-partisan status and associated relationships within and outside the FIT community. These activities could include facility uses by users external to the FIT community, including but not limited to facilities rentals and events co-sponsored with members of the college community.

In the case of external users presenting potentially partisan events, FIT must:

- preserve the opportunity to clarify to the public that such events do not represent any endorsement by the college, and
- allow alternate views to be presented if such requests are made and facilities are available.

The formulation of standards for political, election, and legislative advocacy activities on campus will provide clarity to all members of the FIT community. This will minimize institutional risks and protect free speech by outlining a consistent standard for activities generated and controlled by FIT's community. In addition, this policy defines a consistent standard for the FIT community to maintain in its responses to external requests related to political, election, or legislative activities and advocacy.

## Who is Responsible for this Policy

- Office of Communications and External Relations
- Office of Event Production and Facilities Licensing
- Office of Vice President for Enrollment Management and Student Success
- Office of Vice President for Academic Affairs

## Who is Affected by this Policy

- All members of the FIT community, (acting on behalf of, or in the name of, the college)
- Any user, internal or external of FIT facilities

## Definitions

N/A

## Principles

As a public institution of higher education, FIT recognizes the benefits of exposing students to political debate and information, including partisan political speech, and therefore welcomes such discussions generally. college political and election activity, as well as legislative advocacy, are regulated by city, state, and federal laws, as well as college policies.

FIT facilities are used by a wide range of students, administrators, faculty, staff, and external users for various college-approved events. When reviewing requests for permissions to use campus facilities, the college must be guided by the principal of viewpoint neutrality and even-handed treatment as to all terms and conditions of use. Neither the college nor its representatives acting in an official capacity may take or refuse to take any action or make any statement that aids or hinders a candidate or political campaign.

Additionally, individuals who recruit, interview, or hire applicants for FIT employment; make promotional, disciplinary, or other employment decisions relating to an FIT employee or award or make decisions related to contracts or grants, may not ask applicants, employees, or current or prospective contractors or grantees, as the case may be, the individual's party affiliation, whether the individual has made campaign contributions to, and/or raised funds for any party, elected official or candidate, or whether the individual voted for, supported or opposed any elected official or candidate. No employee may be forced or pressured to contribute to a political campaign by another employee, nor threatened with any harm for making or withholding a contribution. Individuals seeking political contributions may not be admitted to FIT property to solicit contributions from employees, students, or the FIT community.

Attached, in the related document titled Best Practices for Ethical Engagement in Political and Election Activities, and Legislative Advocacy, we provide an overall summary of the "do's" and "don'ts" of political entanglements of colleges and their personnel and student body in campaigns for public office. The summary is not exhaustive and omits individual legal citations.

## Responsibilities

N/A

## Procedures

- **Communication**  
Annually, Communications and External Relations will send an email to FIT employees in advance of the primary election season.
- **Enforcement**  
The Government and Community unit has college-wide responsibility for overseeing compliance with this policy. In addition, in the course of its routine monitoring of FIT's social and media platforms, CER will review those communications for policy compliance.
- **Complaints**  
Reports of complaint will be filed with the Office of Human Resource Management and Labor Relations.

## Violations

N/A

## Related Policies

- [Non-discrimination and Anti-Harassment](#)
- [Social Media](#)

## Related Documents

- [Best Practices for Ethical Engagement in Political and Election Activities, and Legislative Advocacy](#)
- American Council on Education (ACE) memorandum Political Campaign-Related Activities of and at colleges and Universities, 2011, 2014 <http://www.acenet.edu/news-room/Documents/Memo-Political-Campaigns.pdf>
- American Council on Education (ACE) memorandum- National Association of college and University Attorneys  
[http://www.nacua.org/documents/ACE\\_Memo\\_CampaignRelatedActivitiesOnCampus\\_2011.pdf](http://www.nacua.org/documents/ACE_Memo_CampaignRelatedActivitiesOnCampus_2011.pdf)
- [State University of New York, Office of General Counsel memorandum Political Campaign Activity at SUNY Campuses, 2014](#)

## Contacts

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