

Guidelines for Faculty and Staff: Campaign Activity

September 2022

The Johns Hopkins University (JHU) and The Johns Hopkins Health System (JHHS) are committed to the free and open expression of ideas. JHU and JHHS encourage members of the Johns Hopkins community — faculty, staff, and students — to be engaged civically and to participate in the electoral process at all levels: local, state, and federal. Federal law, however, provides that tax-exempt organizations such as JHU and JHHS, and any schools, hospitals, or tax-exempt affiliated entities, may not themselves “participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office.”¹ A violation, whether intentional or unintentional, could have serious ramifications for the university or health system.

This document provides practical guidance to members of the Johns Hopkins community on complying with university and health system policies and IRS requirements. Of course, no set of guidelines can address every potential situation. Questions should be addressed to the University General Counsel’s Office (410-516-8128), Health System General Counsel’s Office (410-955-7949) or the Offices of Federal Strategy and Government and Community Affairs (443-997-5999).

General

Faculty and staff may engage in campaign or partisan political activities provided they do so on their own time, in their personal capacities, and without the use or support of university or health system resources. Please note that federal laws apply differently to people who are not U.S. citizens and can restrict personal activity.

Participation in Political Campaign Activities

Faculty and staff may participate in political campaigns provided it is clear that their statements and activity are undertaken on their own behalf and not on behalf of the university or health system. If an employee’s university or health system affiliation is mentioned for identification purposes in connection with their political activity, it must be made explicitly clear that the employee is acting in their personal capacity and not on behalf of Johns Hopkins. All employees must refrain from using university or health system resources in the course of their participation in any political campaign. For the purposes of complying with university and health system policies, “university resources” and “health system resources” include — but are not limited to — university or health system letterhead, Johns Hopkins email accounts, Johns Hopkins cell phones, Johns Hopkins zoom accounts, the university’s or health system’s physical facilities, office supplies, and the use of staff to support campaign activities. Of course, staff may, of their own accord, engage in political activity on their own time and without use of university or health system resources.

Fundraising

As non-profit entities under federal law, JHU and JHHS are prohibited from engaging in fundraising on behalf of a political candidate or party. In that regard, faculty and staff must avoid the following activities:

- Using JHU or JHHS funds to reimburse individuals for political donations; or
- Soliciting staff or faculty to make political contributions or support a political candidate using JHU or JHHS email, letterhead, stationery, or websites; or

¹ 26 U.S.C. §501(c)(3)

- Requiring staff to solicit or make campaign contributions.

The prohibition on fundraising does not prohibit faculty and staff from engaging in such activities in their personal capacities. Any fundraising must be undertaken on personal time and without use of university or health system resources.

Campaigning

JHU and JHHS cannot engage in any campaign activity in support of or against a party or a candidate for elective office. Use of the JHU or JHHS name in support of or against a particular candidate's campaign is forbidden.

To the extent faculty and staff members engage in correspondence, e-mails, or other communications for the purpose of campaigning, they must not use university or health system letterhead or resources and must make clear that they are acting in their private capacities and do not represent the views or position of the university or health system. If such communications make reference to a faculty or staff member's affiliation with JHU or JHHS, they should include the following statement:

"The views stated in this communication are my own and do not express the position or views of The Johns Hopkins University/ The Johns Hopkins Health System."

In addition, faculty and staff must not provide hyperlinks on a university or health system website to a candidate's website or linking to other material supporting one candidate over another.

Candidate Speeches, Debates, and Forums

JHU, JHHS, or a JHU or JHHS faculty, staff, or student group, may invite a candidate to speak on campus provided all candidates are provided an equal opportunity to speak. For example, if a student Democratic club invites a Democratic candidate to speak on campus, the student Republican club must have an equivalent opportunity to invite the Republican candidate for the same office. Another example, if a non-partisan club or faculty or staff member invites a candidate to speak on campus, they must also invite all other candidates in that political race to provide an equal opportunity for participation. JHU, JHHS, or JHU or JHHS faculty, staff, or student groups, may also conduct forums and debates provided that all candidates are given an equal opportunity to participate. The format and content of the debate should be presented in a neutral manner. An explicit statement should be made as part of the introduction of any speech, debate, forum, or other political event that the university or health system does not endorse candidates for public office. Organizers must notify the Offices of Federal Strategy and Government and Community Affairs and the University or Health System General Counsel's Office in advance of such a forum or debate.

Use of space

Campaigns and candidates that seek to use or rent JHU or JHHS space for a campaign-related speech or event are subject to the rules and requirements pertaining to such uses. Any established fee or rent must be paid, and cannot be waived by the JHU office responsible for the space. Note that certain spaces, particularly those that are widely and publicly recognized and affiliated with JHU or JHHS, are never allowed for campaign events. All events must be conducted in accordance with applicable JHU or JHHS policy and the law and should be reviewed in advance by the Offices of Federal Strategy and Government and Community Affairs.

Additional information and FAQ's are available on the [website](#). Please contact the Offices of Federal Strategy, Government and Community Affairs, or the General Counsel's Office with any specific questions regarding these guidelines or participation in political campaign activities.