

Political Activity Policy

USC encourages all members of its community to participate in the political process. We provide these important guidelines to ensure participation complies with applicable rules and regulations.

The following examples are used for illustrative purposes only. Please contact USC University Relations at (213) 740-5371 or email <u>vpgr@usc.edu</u> for specific questions related to local, state, and federal political activity policy.

EXPRESSION OF POLITICAL VIEWS AND SUPPORT OF POLITICAL CANDIDATES

Can I express political opinions or support specific parties/candidates in my personal capacity?

Of course! Individuals in their personal capacity may express their political opinions and endorse, support, or oppose candidates for political office or a political party. However, an individual's university title may be used only for identification purposes and should be accompanied by a statement that the person is speaking as an individual and not as a representative of USC.

Can I support a candidate or political party as a representative of the university?

Individuals may <u>not</u> make political statements or endorsements, support or oppose candidates for political office, or support or oppose a political party in the name of – or on behalf of – the university. Any appearance of this being done on behalf of the university should also be avoided.

USC's name, logo, mark, seal, or any other graphic identity – as well as those of any of its schools, departments, institutes, or divisions – may <u>not</u> be used to imply that the university is taking a position on any political party or candidate.

Can I make political and/or campaign donations to specific parties/candidates in my personal capacity? Individuals may make contributions to candidates or political parties in their personal capacity using personal funds and may use their university position to identify themselves. Individuals may <u>not request</u> reimbursement from the university for political contributions.

Can I make political and/or campaign donations to specific parties/candidates using university funds? No university funds may be used for campaign or political contributions. Furthermore, no university funds, services, equipment, supplies, location, address, or personnel may be used in connection with endorsing, supporting, or opposing a candidate for political office or a political party.

INVITATIONS TO CANDIDATES AND GOVERNMENT OFFICIALS

Can students and other campus organizations invite candidates for political office to campus? As an academic institution, USC values the opportunity for students, faculty, and staff to view the political process firsthand on our campuses. This includes visits by candidates for federal, state, and local offices. Protocols are in place to ensure that the university remains in compliance with regulations for nonprofit institutions. While it is prohibited to use these events to advocate or fundraise for, or endorse candidates on behalf of USC or student, staff, and faculty organizations, the university can host events or meet-and-greets with candidates to discuss and exchange viewpoints.

Candidate visits must be approved in advance by University Relations and permitted through the <u>Office of</u> <u>Cultural Relations and University Events</u>. Please inform University Relations at the very beginning of this process to ensure your proposed event is in compliance with the relevant protocols. Recognized student organizations are also subject to <u>the Student Handbook.</u>

Who do I need to notify if I am inviting a candidate or government official?

If you or your campus organization/group are contemplating such an invite, please contact USC University Relations at (213) 740-5371 or <u>vpgr@usc.edu</u> before proceeding.

What measures should event organizers put in place to ensure compliance?¹

It is important for USC organizers to clearly communicate with the candidate about the educational and informative purpose of the event. While the candidate may answer questions or reference his/her election during the visit, the USC organizer must ensure it does not become a campaign event. Organizers should consider the following guidance:

- Before the event, there should be clear communication with a candidate about the educational and
 informative purpose of the event, and any elements from the event that could be considered express
 advocacy should be removed.
- At the beginning of the visit, the audience should be reminded that as a nonprofit organization, the university may not endorse, or support candidates and the event is for educational and informational purposes.
- USC may not reproduce, republish, or distribute the candidate's campaign literature, advertisements, campaign signs, or other similar materials.
- If an invitation is extended to a candidate, please consider extending similar invitations to other viable candidates.
- Organizers should be ready to terminate any event in which a candidate does not adhere to the university's rules.

If a political candidate or political candidate's campaign staff is visiting our university, can they take photographs?

Generally, photographs are fine to record the site visit but cannot be used for campaign purposes. All questions on whether any planned political activities are consistent with, or otherwise permitted, must be directed to USC University Relations.

Is it permissible to host a public official's task force meeting on our campuses?

Depending on the circumstances, the university may be able to offer a room at no charge for the meeting without a political reporting requirement. However, food/beverages would be deemed a reportable gift to the government officials in attendance. Please contact USC University Relations to review details and specific circumstances.

May I invite a USC parent or donor who is also a government official to a USC event?

We are required to inform government officials of gift limits and the value of any gifts offered by the university at the event. This can include food and beverage served at the event. Similar to the above examples, please first check with USC University Relations.

GIFTS TO GOVERNMENT OFFICIALS

Can I give a football ticket or other gift to a public official?

¹ Generally, events featuring a candidate should have an educational and informative purpose. If you are considering a candidate debate or candidate forum, additional rules will apply. You must receive approval from University Relations prior to hosting such an event.

Not without prior approval. University funds may not be used, and expenses may not be incurred, to provide anything of value to a government official without prior approval from USC University Relations as there are different restrictions at each level of government (federal, state, county, and city).

Can I give some USC "swag" or thank you gift to a public official who was a guest lecturer or at my class? For the reasons above, please do not provide gifts to government officials. Personalized plaques or trophies and other items of nominal value can be an exception. Nominal means an insignificant item typically purchased in large volume and provided for free as a means of advertisement at events, such as a pen, pencil, note pad, or similar item. However, please contact USC University Relations before proceeding.

An elected official has asked our office for a contribution towards their holiday toy drive. Can we give them toys or a financial contribution?

Please check with USC University Relations first. Generally, the university may donate to nonprofit organizations but the donation may be reportable.

LOBBYING

Is it okay to sign on a letter of support asking for regulatory action?

USC employees, including faculty, can sign onto a letter in their own individual capacity. However, signing onto a letter on behalf of the university can constitute lobbying. Thus, even if you have the provost's approval to do so, you must contact USC University Relations for approval as well. Please provide USC University Relations with copies of submitted letters supporting or opposing a position.

I am going to Washington, D.C. to testify on a bill. Is this lobbying and must it be reported?

To ensure compliance with all applicable disclosure laws, our faculty and staff must notify University Relations whenever they are involved in communications with government officials in their capacity as a USC employee, including testifying, research, and preparation of materials for the purpose of communicating with government officials.

VOTER PARTICIPATION AND REGISTRATION EFFORTS

Can the university lead nonpartisan voter registration and political participation efforts?

The USC community may participate in and support nonpartisan voter participation and registration efforts. As in previous election years, USC works with campus partners to encourage 2024 election voting participation, both on our campuses and in our local neighborhoods.

If you have questions, or would like more information regarding political activity policy, please contact USC University Relations at (213) 740-5371 or email <u>vpgr@usc.edu</u>.

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