

**From:** Michele G. Wheatly, Vice Chancellor and Provost [mailto:provost@syr.edu]

**Sent:** Wednesday, September 27, 2017 9:27 AM

**To:**

**Subject:** Guidance on Government Relations, Political Activity, and Lobbying

**Syracuse University**

Office of the Vice Chancellor and Provost

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September 27, 2017

As we begin a new academic year, it is important that our faculty and staff are informed related to relevant laws, regulations, and University policies affecting how the University and its employees engage in political discourse, and interact with government officials and political candidates.

The University values the rights of individual citizens to speak and assemble freely, and to participate in discourse on public policy issues. Several members of the University have already made very important contributions to current public policy debates. At the same time, it is important to remind members of the administration, faculty, and staff of long-standing University policies designed to ensure that the activities and speech of individual members of our University community do not create a situation where Syracuse University (the institution) can be viewed as engaging in partisan political speech. As a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code, Syracuse University is prohibited from participating or intervening in any partisan political activities.

In your role as an employee of the institution, it is important that you are aware of all relevant policies, ethics laws, and regulations that affect how the University may interact with public officials at all levels of government. Accordingly, the information below provides guidance concerning relevant laws, regulations, and University policies affecting how the University and its employees can engage with government officials and political candidates.

Please direct any questions about this memorandum or the issues contained herein to Abby Perer in the Office of University Counsel at 315.443.9732 or [arperer@syr.edu](mailto:arperer@syr.edu).

## **Guidance on Government Relations, Political Activity, and Lobbying**

### **A. Partisan Political Activity**

As a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code, Syracuse University is prohibited from participating or intervening in any partisan political activities. As such, Syracuse University cannot participate or intervene in partisan political activities on behalf of or in opposition to any particular government official or candidate for public office. Intervention includes, but is not limited to, making financial contributions and publication or distribution of written or oral statements in favor of or opposition to a particular official or candidate. Violation of this prohibition may result in monetary fines and exposes the University to possible revocation of its tax-exempt status. This prohibition for the University extends to elections at all levels—federal, state, and local.

Members of the University community are free to engage in partisan political activity on their own behalves, provided that they specify that they are acting *in their capacity as private citizens, and are not representing the University*. This includes any statements, written or verbal, that could be construed as an endorsement of a particular political party, candidate, or cause. For additional guidance, please review a copy of the University's policy on partisan political activity, available [here](#).

## **B. Use of University Property or Resources by Syracuse University Employees**

University resources, including funds, property, event spaces, and information technology like computers and websites, should not be used for individual or personal political activity. Individuals may not host political events on University property—or use University funds, information technology, or other resources to plan or promote such events—in their capacities as private citizens. Schools, colleges, and academic and administrative departments within the University may not sponsor or host partisan political events, and may not use University property or resources for such events.

For additional guidance, please review a copy of the University's policy on partisan political activity, available [here](#). Please review the University's policy governing events on University property, available [here](#).

## **C. Lobbying**

Because of its ongoing engagement with public officials and agencies to advance its mission, Syracuse University is a registered lobbying organization with both New York State and the federal government. Lobbying may be summarily defined as communications with government officials that are intended to influence: (a) the passage or defeat of legislation; (b) the adoption or implementation of any public policy, rule, regulation, or executive action; (c) the awarding of a contract; or (d) the outcome of any rate-making proceeding.

As a registered lobbying organization, the University must publicly report all lobbying activity that occurs at the federal, state, and local levels. For this reason, all faculty and staff are required to report their communications or interactions with government officials, on behalf of or related to the University (e.g., visiting with public officials; writing to public officials; inviting public officials to University events), to the Office of Government and Community Relations. The Office of Government and Community Relations, in conjunction with the Office of University Counsel, is then responsible for determining which, if any, interactions with a federal, state, or local elected official, staff member, or agency/department are considered reportable lobbying activities.

No public or governmental funds are to be used for lobbying activity, which includes travel expenses and any expenses related to preparing for meetings or other communications with public officials. This includes all federal sponsored research funds. For example, faculty or staff may travel to Washington, D.C., in connection with a federally sponsored program; however, they may not engage in lobbying activity during that time if federal funds are used to pay for travel, meals, and lodging.

For more information about the University's obligations as a registered lobbyist organization, please see University policy [here](#).

## **D. Gifts and Meals**

With few exceptions, University policy and federal and state law prohibit the giving of gifts to elected officials or government employees. Gifts include but are not limited to athletic tickets, meals, travel, entertainment, or lodging. Also not allowed are tokens of appreciation or recognition, or providing travel or meals related to official University events or business, without first contacting the Office of Government and Community Relations. For more information about gifts, please see the University gift policy [here](#).



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**Syracuse University**