

POLITICAL ACTIVITIES POLICY

A. Policy Statement

Oral Roberts University supports the involvement of its administrators, faculty, staff and students in their right, as individuals, to participate in the political process. However, under the Internal Revenue Code, as a section 501(c)(3) organization, ORU is absolutely prohibited from directly or indirectly participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for elective public office. Violation of this restriction can result in revocation of tax exempt status and imposition of excise tax penalties on the institution as well as on organization managers who approved the undertaking of impermissible political activities.

A “candidate for public office” is an individual who offers himself as a contestant for an elective public office, whether such office is national, state or local. Section 501(c)(3) defines participation in a political campaign as including the publishing or distribution of statements. IRS regulations further provide that publication or distribution of written or printed statements or the making of oral statements on behalf of or in opposition to a candidate constitute intervention in a political campaign.

B. Prohibited Political Activities

ORU, including its students, faculty and staff in their capacity of acting on behalf of the University, shall not engage the following activities:

1. Endorsing, expressly or impliedly, a candidate for public office.
2. Making or providing payments to support candidates or political campaigns.
3. Commenting on specific actions, statements or positions taken by candidates, including incumbents, in the course of their campaigns. ORU may take positions on public policy issues provided that the University avoids any issue advocacy that functions as political campaign intervention.
4. Participating in or coordinating fund-raising of a candidate for public office, political party, Political Action Committee or the like.
5. Reimbursing college or University officials for campaign contributions.
6. Providing mailing lists, use of office space, telephones, photocopying or other institutional facilities or support to a candidate, campaign, political party, PAC or the like free of charge.
7. Using institutional letterhead, trademarks, or logo in support of a candidate, political party, PAC or the like.

C. Scope of Permissible Political Activities

The following are general categories of activities that may arise and the policies and procedures that govern participation. This list is not all inclusive and participants contemplating these activities should coordinate through ORU's Office of University Relations and Development.

1. Candidate Debates and Forums

As a tax-exempt organization, ORU may sponsor political forums or debates provided they are sufficiently non-partisan in nature and are conducted for the purpose of educating voters. The debates should ensure a fair and neutral forum and provide equal time to all qualified candidates. ORU organizations may sponsor political forums or debates in accordance with the following guidelines:

- (a) The debate forum should generally include all legally qualified candidates for the contested office. While political forums or debates need not include every group, party or individual seeking election, the selection criteria for participation must be non-partisan.
- (b) The debate topics should cover a broad range of issues, including those issues of importance to the University.
- (c) The questions presented to the candidates should be composed by an independent, non-partisan group. This group could include members of the University, the media, community leaders and interested citizens. Participants should be allotted equal time in which to present their views and ideas.
- (d) A moderator should be selected by the ORU sponsoring organization and his or her role should be limited to ensuring that the debate ground rules are followed. The moderator should refrain from commenting on the candidates' statements in a way that demonstrates approval or disapproval of their ideas.
- (e) The debate should begin and end with a clear statement to the effect that the views presented are those of the candidates and not of the University.

2. Student Newspaper

ORU's student newspaper may accept paid political advertising by candidates as long as several guidelines are followed. The acceptance of the advertising must be made on the same basis as other non-political advertising and the advertisements should be preceded by a statement that they are paid advertising and not reflective of ORU's views. Advertisements should be solicited in a fair manner according to established guidelines and equal time should be given to all candidates who wish to use any broadcast medium for paid political advertising.

ORU's student newspaper should not publish editorials that oppose or endorse specific legislation and/or candidates for political office as there are other media outlets available, not associated with ORU, for any student desiring to express their individual views on these issues.

3. Candidate Appearance

An appearance of a candidate for public office on the ORU campus must be for an educational or informational talk to the ORU community and must be sponsored by a recognized ORU organization. All such organizations must secure approval at least two weeks in advance, through the Department of University Relations and Development. Such appearances shall be limited to speeches, question-and-answer sessions or similar communications in an academic setting and are not to be conducted as campaign rallies or events. Media coverage may not be directly controlled by the candidate or party or any other organization not affiliated with the University.

ORU should make it clear that the institution does not support or oppose the candidate in all promotional materials related to the event, and state this disclaimer again when introducing the candidate at a public forum. ORU should also ensure that there is absolutely no political fundraising at the event. If a candidate is invited to speak at an ORU event in his or her capacity as a political candidate, all candidates must be provided an equal opportunity to participate. ORU may not indicate any support for or opposition to any of the candidates.

4. Student Organizations

ORU recognized student organizations may use available University space for speeches by political candidates, subject to approval by the Office of University Relations and Development (subordinate to educational use of the facility or facilities), provided that such organizations pay the normal costs, if any, for such use (including any increased security costs necessitated by the invitation). Ticket sales may not be sold nor may admission be charged. Any such usage will require that all announcements and advertisements of the appearance clearly indicate:

- That ORU does not support or oppose candidates for public office;
- That the opinions expressed are not those of ORU; and
- The identity of the sponsoring organization.

These announcements shall be made at the beginning and end of the appearance.

5. Non-ORU Organizations

Organizations without affiliation to ORU are generally not eligible to use University space to host partisan political activities.

6. Voter Registration on Campus

ORU may provide a forum for on-campus voter registration, either under its own auspices or under the sponsorship of other organizations. Allowing or conducting voter registration on campus must be conducted in a non-partisan and fair manner. ORU will follow the Federal Election Commission's guidance as well as applicable state law on conducting any nonpartisan voter registration campaigns, including requiring that either all candidates or no candidates be named, that all or no party affiliations be given, and all persons interested in registering be permitted to do so regardless of their party preference.

7. Course Credit for Participation in Political Campaigns

ORU may offer course credit to students who participate in political campaigns, either as interns or as part of an approved curriculum in a class provided that the selection of the campaign is wholly within the discretion of the student. ORU shall not retain or exercise any control over the student's selection of a campaign or the manner in which the student participates in the campaign. In addition, the course offering credit for campaign participation must be an elective and not a mandatory part of any curriculum. Finally, the course curriculum should delineate how participation in the campaign relates to the educational goals of that particular course or department curriculum.

8. Issue Advocacy vs. Political Campaign Intervention

ORU may take positions on public policy issues provided that the University avoids any issue advocacy that functions as political campaign intervention. No statements, direct or indirect, shall be issued to vote for or against a specific candidate. Issue advocacy must be approved through the Office of University Relations and Development and the Office of the President.

9. Web Sites

ORU may not utilize its web site as a form of communicating favoritism or opposition towards a candidate for public office. The same rules apply as to printed materials, oral statements, or broadcasts. In addition, ORU's web site should not contain links to other web sites that promote or oppose candidates. Similarly, using message boards and forums affiliated with ORU's website to support particular candidates is prohibited if the statements of the provider of the information can be reasonably attributed to the institution. A disclaimer that states that the opinions are neither those of ORU nor sanctioned by the institution is to be placed in any public discussion areas where the information could reasonably be attributed to the University.

10. Political Signs

The University generally allows political signs in personal offices and dorm rooms as long as they are in good taste and are not offensive. Signs may not be placed in

common areas, on the outside of buildings, including facing out from office or classroom windows, on the grounds or in any other manner that could be attributed to ORU.

D. Attribution of Individual Activities to Section 501(c)(3) Organizations

Participation by a member of ORU community – a faculty member, a student organization, or a senior University official – should not be attributed to ORU. ORU employees cannot make partisan comments in official organization publications or at official functions of the organization. Where such participation is undertaken solely in an individual capacity, without making any use of the resources of ORU, the following guidelines apply:

1. Employees who desire to participate in campaign activities during normal working hours must take vacation time or leave without pay to do so.
2. Employees are prohibited from speaking or acting in the name of ORU. If ORU is identified, it must be communicated that the opinions that are expressed are not the opinions of the University. Employees cannot use ORU's letterhead, logo or any other reference in connection with campaign activities. Employees should not use the organization's support services or supplies (administrative, duplicating, messenger, etc.) in connection with campaign activities.
3. Any employee who participates in a political campaign must notify the campaign in writing (with a copy to ORU) that such participation is in his or her individual capacity. ORU should retain its copy of the letter in its files. The employee should seek, to the extent possible, to minimize any references to his or her position with ORU by the campaign.
4. Employees may not make partisan comments in official organization publications or at official functions of ORU.
5. Public statements, oral or written, by institutional officials (such as the president and deans) in support of a candidate, political party, PAC or the like, where there is risk that the statements would be perceived as support or endorsement by the institution should be avoided.

The foregoing is not exhaustive. Considerable judgment in the application of these principles is likely to be required. When activities that are separately identified in this memorandum are combined, the interaction between the activities should be analyzed as the combination of activities may affect whether the institution is engaged in political campaign intervention. Additional information regarding Political Activities can be obtained from and questions should be directed to David Wagner, Vice President for University Relations and Development.

Adopted 4-16-09 by ORU Board of Trustees