



Political Activity Policy

Policy Number: HR 4122

Effective Date: 12/2006

Review Date: 07/2026

Approved By: President and Executive Cabinet

1. Purpose

The College of Southern Maryland ("CSM" or "College") is committed to maintaining institutional neutrality in the political process. This policy establishes expectations for employee political activity to ensure that personal political interests and activities are clearly separated from official College business, and that College resources, events, and communications remain nonpartisan and consistent with applicable laws and College policies.

2. Scope

This policy applies to all employees.

3. Definitions

Employee(s) includes all faculty, staff, temporary employees, and contractual employees of the College.

Conflict of Interest means a situation in which an employee's personal, financial, or outside interests could influence, or appear to influence, the employee's impartial and independent judgment in performing College duties.

Candidate (or Political Candidate) means an individual who is holding or running for an elected public office in any level of any federal, state or local government, including individual seeking election in a general election, primary election, or a nominating caucus, and individuals who have filed for a formal declaration of candidacy or have made a public statement of their candidacy prior to the legal opportunity to declare.

Campaign means an organized effort to influence individuals and/or groups to elect a particular Candidate or Candidates to public office.

Political Activity means directly or indirectly participating in or intervening in any political campaign in support of or in opposition to any Candidate for elective office or a political party, or a political action committee (PAC). Examples of Political Activity could include taking a position on an issue for the purpose of assisting or opposing a Candidate or political party in a Campaign, raising funds or canvassing for a Candidate, recruiting volunteers, distributing a Candidate's campaign materials, or sponsoring the appearance of a Candidate for public office.



Political Organization means any entity that involves itself in the political process, including political parties, non-governmental organizations, and special interest advocacy groups.

Student Organization means a group of CSM students that is recognized by, sponsored by, or affiliated with the College, in accordance with College procedures.

Candidate Surrogate or Advocate means another politician, celebrity, or person of influence, campaigning on a Candidate's behalf.

College Resources means College time, facilities, equipment, IT systems, email/listservs, networks, social media accounts/handles, trademarks/logos, office supplies, and other assets.

4. Policy Statement

CSM is committed to maintaining institutional neutrality in the political process and shall not endorse, oppose, support, or contribute to any political candidate, political party, political action committee, or ballot measure. Employees retain their rights as private citizens to engage in lawful political activities; however, such activities must be conducted in a personal capacity and in a manner that does not create an actual, potential, or perceived conflict of interest, interfere with College responsibilities, or imply College sponsorship, endorsement, or opposition.

Employees acting within the scope of their employment or representing the College shall remain nonpartisan and may not use College Resources to support or oppose political candidates, parties, campaigns, political organizations, or ballot measures. Political activities conducted on College property or through College-sponsored events must comply with applicable College policies, be nonpartisan in nature, and maintain equal treatment and access where required. Employees are expected to exercise sound judgment to ensure that their personal political views and activities are clearly distinguished from the official positions and interests of the College.

- A. CSM shall remain nonpartisan and shall neither support nor oppose elected officials, political campaigns, or persons running for elected office or in primaries or caucuses for such office.

In support of this policy:

- i. The College will not sponsor, rate, support, or oppose Political Candidates;
- ii. Neither the College nor any employee acting within the scope of employment will conduct, hold, offer, sponsor, or co-sponsor a candidate debate, forum, or presentation except:
 - a. Faculty may conduct such events for bona fide pedagogical purposes limited to their classes, and students actively enrolled therein, if all declared candidates are invited and treated equally;
 - b. The President may approve a public event open to the campus/community, provided all declared candidates are invited and treated equally and event



logistics comply with GA 3011 Free Speech & Expression and GA 3008 Facility Use.

- iii. College resources, including technology resources (such as, but not limited to, e-mail) may not be used to sponsor, rate, support, or oppose Political Candidates, political parties, political organizations, PACs, or ballot-measure committees;
 - iv. Campaign signs, handbills, and placards may not be posted on any College property, except as permitted by law when a College facility is used as a polling place. General posting logistics and size/placement rules are governed by GA 3011 Free Speech & Expression;
 - v. Neither the College nor any employee acting within the scope of employment will promote voting with respect to issues that have become identified as dividing lines between candidates (Example: Providing voter education materials listing voting records of incumbents on land conservation has been disapproved by the Internal Revenue Service.); and
 - vi. Contributions by employees acting in their personal capacity to political campaigns and political action committees shall not be reimbursed.
- B. Candidates or Surrogates appearing on campus must do so only for educational, forum, or talk purposes, or for political debates. They can appear in a non-candidate capacity if no campaigning or fundraising is done at the event and a non-partisan atmosphere is maintained. Candidate forums or debates are permitted if invitations are nonpartisan and all candidates have equal speaking opportunities, with communications clearly stating that the College remains neutral. No political activities are permitted on College's property prior to, during, or after the event. Candidates or surrogates will be made aware of this policy and requested to acknowledge their understanding of this policy. These events must be approved by the President or delegated representative authorized to approve candidate appearances, and in the case of a student group or organization, by the Vice President of Student Engagement and Success or designee. If approved, the event must be coordinated with Facilities, Government Relations, Marketing, and Student Life, if student-sponsored.
- C. Nothing in this policy is intended to:
- Prohibit the college from introducing current officeholders when they attend college events,
 - Restrict lawful activities in support or opposition of a Political Candidate during the time that a college facility is open as a designated polling place,
 - Restrict any nonpartisan voter registration activities, or
 - Restrict the college from providing financial or other support to a student newspaper, even if the student newspaper supports or opposes a Political Candidate.

D. Voter Education and Registration Activities



Voter education and registration activities on campus, including holding public forums, publishing voter education guides, and coordinating voter registration drives, are permissible if such activities are focused on increasing public understanding of or participation in the electoral process. Such activities must be non-partisan and may not focus on a particular candidate or party.

E. Institutional Speech at Official Events

When speaking in an official capacity at a College-sponsored event (e.g., convocation, commencement, ceremonies), officials may be reasonably understood to speak on behalf of the College. Remarks must reflect approved institutional positions and avoid institutional endorsement or opposition of any political candidate, party, or ballot measure. Personal views that may be perceived as institutional positions should not be expressed in these settings. Where personal views are permitted by event format, speakers must include a clear disclaimer that they speak in a personal capacity and not for the College.

5. Procedures

- A. Candidate events require advance approval by the President/designee (and VP Student Engagement for student groups), with Compliance/Government Relations review and documented equal invitations to all candidates.
- B. Approved events must coordinate with Facilities, Marketing, Student Life, and Public Safety, ensure nonpartisan execution, and obtain candidate acknowledgment of policy restrictions.
- C. Voter education and institutional speech must be reviewed as needed to ensure neutrality, avoid candidate bias, and include disclaimers where appropriate; materials and guidance should be retained.

6. Roles and Responsibilities

Employees are responsible for complying with this policy, engaging in political activity only in a personal capacity and without use of College Resources, and seeking guidance or reporting concerns to Compliance & Risk Management.

Supervisors and Managers are responsible for reinforcing compliance expectations and promptly elevating potential concerns to Compliance & Risk Management.

The Assistant Vice President of Government Relations serves as the policy owner and provides institutional oversight regarding political activity, candidate interactions, and external political engagement affecting the College.

Compliance & Risk Management serves as the central intake for questions, guidance, and reports of potential violations of this policy. In addition, Compliance & Risk Management coordinates review of political activity disclosures with the employee, the employee's direct manager/supervisor, Human Resources, and/or other appropriate individuals or offices.



Human Resources (People, Culture, and Engagement) partners on employee-related reviews and corrective or disciplinary actions, as applicable.

Public Safety addresses immediate safety concerns related to political activity or events.

7. Enforcement and Compliance

Compliance with this policy is a condition of employment. All employees are expected to understand and adhere to the requirements of this policy and to seek guidance when questions arise.

A. Reporting and Review

Alleged or suspected violations of this policy, including misuse of College Resources or conduct that may reasonably be perceived as institutional endorsement or opposition of a political candidate, party, organization, political action committee, or ballot-measure committee, must be reported promptly to the Office of Compliance & Risk Management. Reports may be made directly or through established College reporting channels.

The Office of Compliance & Risk Management will conduct an initial assessment and coordinate review with appropriate College offices, including People, Culture, and Engagement (PCE/HR), Government Relations, Public Safety, and/or Executive Leadership, as appropriate. Not all reports will result in formal investigation or disciplinary action; many matters may be resolved through clarification, guidance, or corrective action.

B. Corrective and Remedial Measures

When non-compliance is identified, the College may take one or more corrective or remedial actions, depending on the nature, severity, and circumstances of the violation. Such measures may include, but are not limited to:

- Counseling, training, or written guidance;
- Issuance of a written warning or corrective action plan;
- Removal or correction of improper communications or materials;
- Restrictions on future use of College Resources;
- Recusal from certain duties or events;
- Other management actions designed to prevent recurrence and mitigate institutional risk.

C. Disciplinary Action

Violations of this policy may result in appropriate disciplinary actions, up to and including termination, in accordance with CSM policies.

D. External Implications



Conduct that violates this policy may also implicate external legal requirements, including the Maryland Public Ethics Law and federal tax-exempt regulations. In such cases, the College may be required to take additional actions, including reporting to external authorities or cooperating with governmental inquiries, as required by law.

E. Good-Faith Reporting and Non-Retaliation

Good-faith reporting of concerns or potential violations under this policy is encouraged and protected. Retaliation against individuals who raise concerns, seek guidance, or participate in a review process in good faith is prohibited and may result in disciplinary action.

8. Related Policies and References

GA 3011 Free Speech & Expression

GA 3010 Employee Candidacy and Public Office Service

GA 3008 Facility Use

CSM Petition, Handbill, and Literature Distribution Procedures

HR 4025 Conflict of Interest

Maryland Code, Title 5, Subtitle 1–4

9. Review and Revision Process

This policy will be reviewed and revised as needed, but no less than every four (4) years.

10. Policy Administration

Policy Owner: President

Policy Administrator: Assistant Vice President of Government Relations

For more information, contact the Policy Subject Matter Expert, Assistant Vice President of Government Relations.