

# Juilliard

<b>Title:</b>	Political Activity Policy
<b>Policy Owner:</b>	Office of the General Counsel
<b>Contact Information:</b>	Room 225, Main Building (212) 799-5000, ext. 7201 <a href="mailto:OGC@juilliard.edu">OGC@juilliard.edu</a>
<b>Applies to:</b>	All Juilliard faculty and staff
<b>Effective Date:</b>	November 1, 2021

As a tax-exempt 501(c)(3) charitable organization, The Juilliard School (“Juilliard”) is 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. Federal tax law imposes stiff penalties on any charitable organization that violates this prohibition, including financial sanctions or revocation of tax-exempt status. State laws also forbid political participation by charities, and state-level enforcement is exacting. Employees found to be in violation of Juilliard’s Political Activity Policy as set forth below are subject to disciplinary action, including dismissal, demotion, or reprimand.

***Juilliard Resources and Facilities*** includes anything of value owned, held, or controlled by Juilliard, such as office supplies (including envelopes, letterhead, and postage), courier services, duplicating and facsimile services, long-distance telephone services, Juilliard-issued cell phones or computers, Juilliard vendor discounts or in-house catering, cars and other vehicles, contact and mailing lists, meeting or conference rooms, and the use of support staff (such as administrative assistants).

***Political Activity*** includes any activity undertaken in an effort to influence the outcome of a federal, state, or local election, including the following activities:

- soliciting or collecting contributions to a political candidate or political committee;
- conveying a contribution to a political candidate or committee;
- planning or attending a fundraising event for a political candidate or committee;  
and
- volunteering for, or providing paid services of any kind to, a political candidate or political committee.

***Political Contribution*** means anything of value given to a political candidate or political committee if given for the purpose of influencing an election, nomination, appointment, or

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confirmation for any federal, state, or local office or political party office. This includes direct cash contributions, donated services, purchasing tickets to political events, loan of Juilliard personnel during working hours, sharing of Juilliard contact lists, and payment of third-party services (known as “in-kind” contributions).

## Juilliard Political Contributions and Expenditures

No Juilliard employee may use, or consent to the use of, Juilliard funds or Juilliard resources and facilities to make a political contribution to, or an expenditure for the benefit of, any candidate or political committee.

## Political Fundraising Events

No Juilliard employee may organize, conduct, or host a political fundraising event on behalf of Juilliard, at any Juilliard facility or using any Juilliard resources. No Juilliard resources or facilities, including personnel, may be used to collect or transmit personal checks constituting contributions to candidates or political committees.

## Personal Political Activity

Individual Juilliard employees are free to engage in personal political activity in their individual capacities. No Juilliard employee is required to engage in such activity, and no employee will be advantaged or disadvantaged on the basis of a decision to engage or not to engage in personal political activity. Because of the potential risk to Juilliard’s reputation that such activity could create, it is Juilliard’s policy that employees engaged in personal political activity must comply with all applicable laws and regulations.

No Juilliard resources or facilities (including, but not limited to, compensated work time, Juilliard’s computers, telephones, office equipment, meeting rooms, or staff time) may be used for personal political activity without prior authorization from the Office of the General Counsel. Juilliard employees who make personal political contributions should deliver their own contributions, by mail or by hand, to the recipient candidate or political committee, without using Juilliard staff to collect or deliver the contribution checks. Juilliard letterhead, envelopes, postage, or courier services should not be used to transmit personal political contributions.

No Juilliard employee, consultant, or vendor may submit a request for the reimbursement of a personal political contribution, including any “in-kind” contribution, to any candidate or political committee. Juilliard will not reimburse any personal political contributions made by employees, consultants, or vendors.

A Juilliard employee acting in a purely personal capacity may solicit their family, friends and

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colleagues for political contributions. The employee may not, however, state or imply that they are soliciting political contributions on behalf of Juilliard. The employee may not solicit subordinate employees for political contributions. Finally, the employee may not use Juilliard resources or facilities to conduct such personal solicitations.

Notwithstanding the foregoing, nothing in this Policy should be interpreted to prevent, interfere with, or restrain any employee's personal rights, including the legitimate exercise of Section 7 activities under the National Labor Relations Act or any similar law.