

POLICY ON INVITING AND SPONSORING OUTSIDE SPEAKERS AND RESTRICTIONS ON POLITICAL CANDIDATES/SPEAKERS

Date: December 1, 2013

Supersedes: None

I. PURPOSE

To establish guidelines for inviting or sponsoring an outside speaker and procedures/restrictions on political candidates/speakers at New York Medical College (the "College").

II. POLICY

As an academic institution, the College is committed to standards promoting speech and expression, and openness to diverse ideas and opinions which are responsibly presented. It is the policy of the College to invite or sponsor outside speakers in order to foster intellectual engagement, explore new ideas, new approaches and new cultures, and contribute to educational values provided that the speaker or the context of the speech do not create a public safety concern, threaten to disrupt or obstruct College functions or facilities, foster hatred or intolerance of others or is inconsistent with the values, interests, identity and mission of New York Medical College and/or its Jewish tradition. It is also the policy of the College to comply with applicable laws and IRS guidelines as a 501(c) (3) tax exempt organization and thereby will not, directly or indirectly, engage, participate, sponsor, endorse, support, oppose, contribute, fundraise, or distribute materials in any political campaign on behalf of (or in opposition to) any candidate for elective public office at the federal, state, and local level. The College reserves the right, at its sole discretion, not to invite or to cancel any speaker or event involving the use of its facilities whose nature or subject matter may be in violation of this Policy.

III. SCOPE

This policy applies to outside speakers as defined below and to all members of administrative and academic departments or units of the College and College-registered student clubs or student organizations using any facilities of the College. This policy does not apply to College faculty members in the teaching of their classes or to outside speakers invited by faculty members to make a presentation that occurs in the closed forum of a scheduled course, seminar or grand rounds. Administrative and academic departments or units of the College, faculty or College registered student clubs or student organizations may invite College internal speakers to address their class, organization or other members of our College community.

IV. DEFINITIONS

An *outside speaker* is a person or group not formally affiliated with the College invited to give a speech, lecture, symposium or other such presentation on the College's Valhalla campus or at a College owned or leased facility. An outside speaker must be requested by an authorized inviter.

An *Inviter* is a College academic or administrative unit, or a College-registered student club or organization in accordance with the College's Student Club, Organization, and Event Registration and Approval Policy and Procedures.

V. PROCEDURES FOR ACADEMIC OR ADMINISTRATIVE DEPARTMENTS OR UNITS

- A. Any academic or administrative department or unit (the "Inviter") wishing to invite an outside speaker for a public event must first use reasonable judgment in selecting the speaker consistent with this Policy. When inviting speakers, faculty, staff and administrators must be aware that they themselves are perceived as representatives of the College.

- B. Prior to inviting or making any arrangements with the speaker, the Inviter must submit an Event Request Form to the appropriate Vice President of the administrative department or unit or Dean of the school of the academic department or unit for prior written approval which identifies the following:
 - 1. The name of the speaker to be invited or sponsored by the College.
 - 2. Location, time and anticipated duration of the event.
 - 3. The costs and College resources needed for the event (*i.e.*, tables, podium, security officers, maintenance, food services, housekeeping, etc.)
 - 4. Background information about the speaker's positions, works, published speeches (samples to be attached) and other relevant information sufficient to allow the Vice President or Dean to make an informed decision.

All documentation should be submitted to the Vice President or Dean no less than thirty (30) days prior to the anticipated event.

- C. The Vice President or Dean will review the submitted information and any other information obtained from other resources, and within ten (10) business days, will advise the Inviter of his/her decision as to whether they may proceed with the event.

VI. PROCEDURES FOR REGISTERED STUDENT CLUBS OR ORGANIZATIONS

- A. Student club or organization wishing to invite a guest speaker to campus or to host an event on campus are required to adhere to this Policy as well as to the Student Club, Organization, and Event Registration and Approval Policy and Procedures, applicable to the particular school of the College.

- B. Prior to inviting or making any arrangements with the speaker, the student club or organization must discuss the matter with and seek the preliminary approval from its faculty advisor, if any, and submit a completed Student Club/Organization/Event Request Form to the designated office of the School involved for prior approval no less than thirty (30) days prior to the event. Such Event Form is to contain the following:
1. The qualifications, background and appropriateness of the proposed speaker, background information about the speaker's positions, works, published speeches (samples to be attached) and other relevant information;
 2. The purpose of the event, the content to be presented by the proposed speaker and how the event is related and consistent with the mission of the student club or organization and this Policy;
 3. The location, time and anticipated duration of the event;
 4. The funding source and budget for the event including speaker's fees, reception costs, transportation costs, College resources to be used, the associated costs to the College;
- C. The completed Event Form shall be reviewed and the student club or organization will be notified within ten (10) business days as to whether they may proceed with the speaker and event by the designated office of the applicable School involved. The designated office for the School of Medicine, School of Health Sciences and Practice and the Graduate School of Basic Medical Sciences is respectively, the Office of Student Affairs, the Office of the Vice Dean and the Office of the Dean.

VII. PROCEDURES/RESTRICTIONS APPLICABLE TO POLITICAL CANDIDATES/SPEAKERS

- A. The College is a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code and is thus prevented from participating or intervening, directly or indirectly, in any political campaign on behalf of (or in opposition to) any candidate for elective public office at the federal, state, and local level. The Federal Election Commission regulations also place additional restrictions on political activity at colleges and universities. Given the potential magnitude of the sanctions, fines, and penalties which these bodies have the authority to impose for any violation of their rules and regulations which may result in the denial or revocation of tax-exempt status, any and all invitations to elected officials, political candidates, political campaign representatives, and related speakers must be coordinated and approved in advance and in writing by the Vice President for Government Affairs in conjunction with the Vice President and General Counsel. Similarly, all outside inquiries from these sources to any individual or department

within the College must be referred the Vice President for Government Affairs and the Vice President and General Counsel.

B. General Rules:

1. The College will not invite anyone to speak at any Commencement program who at the time of the Commencement is an active political candidate for any elected office.
2. When determining whether a potential speaker might violate the applicable legal restrictions, the overriding consideration is impartiality and neutrality as the College cannot demonstrate any degree of support of or opposition to the speaker or to any political candidate(s) or their representative(s), or any political party. For this reason, if a political candidate is to be a speaker, all other legally-qualified political candidates must be invited and afforded an equal opportunity to speak at the College.
3. If a political candidate is a speaker, the College must explicitly state in its introduction of the speaker that it does not support or oppose the candidate.
4. Campaign fund-raising is prohibited at any event sponsored by the College or any event on any College owned or leased property. Any appearance or presentation by a political candidate shall not be used to collect campaign contributions, commitments or endorsements from audience members.

VIII. PROCEDURES APPLICABLE TO ALL REQUESTS FOR OUTSIDE SPEAKERS

College facilities made available to outside speakers shall be used only in conformance with the policies of the College. The College reserves the right, in its sole discretion, to deny any request or cancel any scheduled use of College facilities due to the interest of public safety and campus security; the projected or actual financial costs to the College; or other sound business reasons; or if it concludes that the nature or subject matter of a speaker or event may be in violation of this Policy.

IX. EFFECTIVE DATE

This policy shall be effective as of the date signed below.

X. POLICY RESPONSIBILITY

- A. Inviter – submit required documentation and information to the appropriate Vice President or Dean in order to obtain a decision as to whether an outside speaker may participate in a College event.

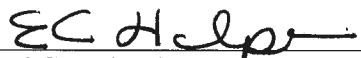
- B. Vice President and/or Dean – review information provided by the Inviter and any information acquired independently in order to render a decision as to whether an outside speaker will be allowed at the College.
- C. The Office of Student Affairs of the School of Medicine, the Vice Dean of the School of Health Sciences and Practice and the Dean of the Graduate School of Basic Medical Sciences-review information by an Inviter which is a student club or organization of such School.
- D. Vice President for Government Affairs and the Vice President and General Counsel-review all requests for political candidates/speakers under this Policy.

IX. POLICY MANAGEMENT

Responsible Executive: Vice President or Dean
Responsible Officer: Vice President or Dean
Responsible Office: Administrative or Academic Department, Office of Student Affairs of the School of Medicine, Office of the Vice Dean of the School of Health Sciences and Practice and the Dean of the Graduate School of Basic Medical Sciences

Any questions regarding the interpretation or application of this policy should be referred to the Office of the General Counsel.

Approved:



Edward C. Halperin, M.D., M.A.
Chancellor for Health Affairs and
Chief Executive Officer

11/20/13
Date:

