



Sample Community Action Agency Political Activity Policy January 2014

This policy has not been approved by any outside authority, such as the Department of Health and Human Services. You should review this policy thoughtfully and modify it as necessary to meet the individual needs of your organization and to comply with any applicable state law requirements and grant terms and conditions. Thus, we strongly recommend that when working with this policy, you consult with an attorney from your state that is well versed in the laws affecting CAAs.

Community Action Agency (“CAA”) encourages its employees to participate fully in the democratic political process as private citizens. As a non-profit 501(c)(3) tax-exempt organization and recipient of Community Services Block Grant (“CSBG”) and other federal funds, however, CAA and its employees must follow certain rules concerning political activity:

A. Activities by Individuals

- 1) Allowable Activities (Off- Duty): All CAA employees and board members may engage in the following activities as private citizens, if conducted during non-CAA work hours, off CAA premises, and without direct or indirect CAA financial support or identification:
 - a) Hold membership and office in, attend meetings of, vote in, and otherwise participate in, political parties, clubs, organizations, and conventions;
 - b) Participate in and manage partisan or nonpartisan political campaigns, including volunteering, writing and making speeches, writing letters, and soliciting voters to support or oppose a candidate;
 - c) Be a candidate in a nonpartisan election for public office (all employees);
 - d) Be a candidate in any election (except employees who are paid completely (100%) with CSBG and/or Head Start funds);
 - e) Contribute to partisan or nonpartisan political campaigns or political parties and request contributions (but not advise, command, coerce, or attempt to coerce such contributions) from others (except not from employees whom they supervise);
 - f) Participate in voter registration drives; and
 - g) Assist in providing transportation to the polls.
- 2) Prohibited Activities (On-Duty). While on-duty at CAA, on CAA premises, or using CAA resources, CAA employees and board members may not engage in any of the activities listed in 1, above.

- 3) Prohibited activities (at all times). In general, CAA employees may not engage in the following activities at any time or place, including during off-duty hours, during leave of any type (including unpaid leave), and off CAA premises:
 - a) Use official authority or influence to interfere with or affect the results of an election or a nomination for office, and
 - b) Directly or indirectly coerce, attempt to coerce, command or advise any employee of CAA or other Community Action or Head Start Agencies to make political contributions, or request such contribution from CAA employees whom they supervise.

However, if the CAA employee is not principally employed by the CAA (i.e., spends less than half of his or her working time employed by CAA or receives less than half of his or her working income from CAA) and/or does not perform any work in connection with activities funded by the Community Services Block Grant or Head Start, the employee may be exempted from the restrictions stated above when off-duty. To be exempted, the employee must receive written authorization from the CAA Executive Director.

- 4) Additional Prohibited Activities for Some Employees. Employees whose salary is paid completely (100%) from CSBG and/or Head Start funds may not be a candidate for public office in a partisan election (including primaries).

B. Activities by CAA

- 1) CAA may not participate or intervene in a political campaign on behalf or in opposition to any candidate for public office. CAA employees should scrupulously avoid identification of CAA with, or use of its funds or resources for, such activity;
- 2) CAA funds may not be used to make contributions to political campaigns, political parties, or political action committees; and
- 3) CAA may under certain conditions conduct limited activities designed to educate, but not influence, voters, such as neutral candidate forums or voter guides, voter registration drives, and transportation to the polls, but only if they are carried out by CAA programs or employees not funded by the Community Services Block Grant or Head Start or other funding sources containing specific restrictions prohibiting such activity and receive the prior approval of the CAA Executive Director.