



Homeword

Homeword Political Engagement Guidelines

(Approved 10/13/2020)

For questions about these guidelines please contact the Executive Director or the Board President.

Organizational

As a nonprofit 501(c)(3), Homeword may engage in lobbying and advocacy but not electioneering.

- Advocacy = to raise public awareness of particular issues
- Lobbying = to influence the passage of legislation concerning particular issues
- Electioneering = to elect candidates based up on their position on particular issues

IRS Federal Tax Code states 501(c)(3) organizations are “**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.”

A nonprofit can, on a nonpartisan basis, promote voter and civic engagement as part of its charitable and educational mission. It **can endorse a ballot measure** because that is considered lobbying – not electioneering.

Homeword has **taken the IRS 501(h) election** which allows the organization an objective “expenditure test” rather than a subjective test by the IRS. By electing 501(h) through submitting IRS Form 5768, a nonprofit sets a lobbying expenditure ceiling using a sliding scale based on a nonprofit’s annual exempt purpose expenditures. Homeword cannot spend more on lobbying than the allowance. For Homeword’s size of operational budget the allowance is \$175,000 + 10% of the excess of except purpose expenditures over \$1,000,000.

When engaging in Advocacy and Lobbying, Homeword shall ensure:

- The issue(s) further Homeword’s Mission and charitable purpose
- The Executive Committee of the Board is made aware in advance of making endorsements or lobbying and analyzes and documents that such engagement is consistent with Homeword’s mission.
- A position statement is developed in advance of making endorsements or lobbying of legislation and ballot measures. This position statement will be provided to staff and board members and will be made available to the public via means such as Homeword’s website and/or social media.
- That it carefully weighs the impacts of engagement
- Remains nonpartisan
- Use of a disclaimer where possible in written materials or at speaking events – for example the organization itself cannot and does not endorse or oppose candidates for elective office.

Individual

Individual employees, volunteers, officers, and directors do not give up their First Amendment rights simply by associating with a 501(c)(3) organization.

In order to protect Homeword's 501(c)(3) status and the rights of the individual, **Homeword's adopted policies are as follows:**

- It's **forbidden to use any of Homeword's assets** or facilities in connection with an individual's electioneering activities.
 - This includes not only the organization's funds, but also its telephones, computers, email accounts, letterhead, mailing lists, copy machines, facilities, buildings, and other resources.
 - Staff shall not use paid work hours for electioneering and shall avoid using organizational events or other platforms for announcing individual's electioneering activities.
- Request individuals **include disclaimers** making clear statements they make in their individual capacities in support of or in opposition to candidates for elective office are their own and do not reflect statements made on behalf of the organization.
 - If the individual's affiliation with the organization is included as part of any electioneering statement by that individual, it should be made clear that it is for identification purposes only and is not intended to reflect action on behalf of the organization.
- Executive Director and other staff positions with high levels of public engagement and influence are encouraged, but not required, to make the Executive Committee of the Board aware of electioneering activities before they occur.