

**POLICY ON EXTERNAL COMMUNICATIONS, POLITICAL ACTIVITIES
AND GOVERNMENT RELATIONS**

The College is a New York education corporation organized and operated exclusively for educational and charitable purposes. The College is exempt from federal income taxation under Internal Revenue Code (“Code”) Section 501(c)(3). To enhance the College’s activities and preserve its tax-exempt status, the Board of Trustees has adopted the following policies:

1. **Communications with the Media.** All persons affiliated with the College, including but not limited to members of the Board of Trustees, administration, faculty, staff and any College committees, will refrain from commenting to the media regarding the College, its activities or plans, except for announcements approved by the President of the College or his or her designee. Questions from the media shall be referred to the President of the College or his or her designee. [The exception shall be for existing academic programs.]

2. **Communications with the Public.** All persons affiliated with the College, including members of the Board of Trustees, administration, faculty, staff and any College committees, should remember that they may be perceived by the public as representing the College and the views of any of those affiliated with the College and should consider any comments about the College in that light and in furtherance of the best interests of the College.

3. **Communications with Governmental Officials or Agencies, Community Groups.** The College expects to be able to engage various governmental and quasi-governmental entities and community groups on issues of concern to the College. In order to present a consistent message from the College and to enhance its ability to successfully express its positions, only those individuals expressly designated by the Board of Trustees, or in its discretion, the President or his or her designee may communicate on behalf of or concerning the College. The President and his or her designees shall submit all communications, proposals, responses to request for proposals, grant requests and government contracts, reports, press releases or other documents on behalf of the College to any governmental and quasi-governmental entities or community groups.

4. **Political Activities.** As a tax-exempt organization under Code Section 501(c)(3), the College cannot intervene in any political campaign on behalf of, or in opposition to, any candidate for public office. Violation of this prohibition could result in the College’s loss of its tax-exempt status or imposition of excise taxes. All persons affiliated with the College, including but not limited to members of the Board of Trustees, administration, faculty, staff and any College committees, will refrain from engaging in the following activities on the College’s property, during corporate functions or while otherwise using the College’s resources or facilities:

- endorsing any candidate for public office;
- donating or contributing to any candidate’s campaign
- participating or engaging in political fundraising events;
- publishing or distributing statements for or against any candidate; or
- engaging in any other activity that favors or opposes any candidate.

5. **Lobbying.** The College anticipates receiving a determination letter that it is a tax-exempt organization as described in Code Section 501(c)(3). The College will not, and no affiliate, acting directly or indirectly on behalf of the College will, participate in or intervene in any political campaign on behalf of any candidate for public office, including the publishing or distributing of statements. No substantial part of the activities of the College will consist of carrying on propaganda, or otherwise attempting to influence legislation, except to the extent permitted by applicable law and regulations for not-for-profit, tax-exempt organizations. The President and his or her designees shall direct all activities which may be deemed to fall within this section.

6. **Disclosure Requirements.** As a tax-exempt organization, the College is subject to ongoing disclosure requirements to the IRS, state regulatory agencies and the general public. The President shall be responsible for responding to all requests for disclosure of information to ensure compliance with applicable disclosure requirements as failure to comply may result in revocation of the College's tax-exempt status.

- Disclosure of any changes in sources of support, purposes, character, or method of operation, including, but not limited to amendments to the College's Certificate of Incorporation or By-Laws, to the IRS.
- Disclosure* of the College's Form 990 and 990-T (if applicable) for three years after the later of the due date of the return or the date the return is filed. *Note: Certain information such as donor names and address may be redacted prior to public disclosure.*
- Disclosure* of the College's exemption application submitted to the IRS together with any supporting documents as well as its exemption letter.
- Disclosure of state charities filings. *Note: Many states also allow a charitable organization to refer the request to the state regulatory agency that oversees charitable organizations to obtain these filings.*

*Copies of these documents must be provided to any individual upon written or in person request without charge other than reasonable fees for copying and postage. The College may fulfill this requirement by placing these documents on the Internet.