



GUIDELINES ON PARTICIPATING IN POLITICAL AND LOBBYING ACTIVITY

PERMISSIBLE ACTIVITY	HOSPITALS ¹	OHA ²	FOR-PROFITS ³	PACs	INDIVIDUALS ⁴
Contributions to candidates/host a fundraiser				X	X
Contributions to PACs/host a fundraiser				X	X
Contributions to political parties/host a fundraiser ⁵			X	X	X
Contributions to ballot issue campaigns/host a fundraiser ⁶	X	X	X	X	X
Non-partisan voter registration drives	X	X	X	X	X
Non-partisan candidate forums (all candidates for an office invited)	X	X	X	X	X
Candidate forums which do not include all candidates				X	X
Contributions to issue education campaigns ⁷	X	X	X	X	X
Contributions to issue advocacy campaigns ⁸			X	X	X
Sponsorship of a PAC		X	X		X
Endorsement of a candidate				X	X
Letters to the editor/editorials supporting/opposing a candidate				X	X
Communications to medical staff/employees supporting/opposing a candidate				X	X
Educational communications to medical staff/employees on an issue ⁹	X	X	X	X	X
Communications to patients/the public supporting/opposing a candidate				X	X
Educational communications to patients/the public on an issue ¹⁰	X	X	X	X	X
Production or distribution of materials supporting/opposing a candidate ¹¹				X	X
Discussions with candidates to educate the candidate on issues ¹²	X	X	X	X	X
Include a link to a candidate's web page in communications/web page				X	X

¹ Applies to both charitable and governmental hospitals. Charitable hospitals may engage in "grass root political activity" only, which includes lobbying, supporting or opposing ballot issues, issue education, voter registration and other non-partisan activity. Expenditures for grassroots political activity may not in the aggregate exceed 5% of the hospital's annual revenues. Since OHA's source of revenue is dues paid by hospitals, partisan political activity by OHA may be imputed to member hospitals.

² Assumes OHA will be using funds paid by hospitals as dues or other assessments. Sponsorship of a PAC is permitted assuming hospital funds will not be directly used to support the PAC and OHA staff time and other resources used to support the PAC will be minimal.

³ For-profit subsidiaries of a charitable hospital may participate in activities which the hospital may not directly participate in *only if the operations of the for-profit are not subsidized by the hospital and revenues generated by the for-profit activity are used.*

⁴ The expenditures may not be reimbursed by the hospital.

⁵ Contributions to political parties by corporations may be used for limited purposes, which do not include supporting or opposing candidates.

⁶ Ballot issue campaigns are campaigns to support or oppose an issue which will be on the ballot - e.g. a tax levy issue.

⁷ These should not be confused with issue advocacy campaigns such as the campaign sponsored by the Chamber of Commerce. The purpose of an issue education campaign may not be to support or oppose a candidate, and it may not mention a candidate's name.

⁸ This is the type of campaign sponsored by the Chamber of Commerce, which identified a candidate and the candidate's position on the issue of tort reform.

⁹ Communications may not identify a candidate.

¹⁰ Communications may not identify a candidate.

¹¹ Brochures, yard signs, posters and other materials should not be paid for by the Hospital nor distributed or displayed in hospital facilities.

¹² This includes discussions directly with a candidate or forums attended by candidates to educate candidates on an issue, but the purpose may not be to support or oppose the candidate or to provide a forum for the candidate to express the candidate's views, (unless the forum is paid for by an individual or a PAC and not held on hospital property).