

**Pondera Medical Center
Administrative Policy/Procedure**

Policy Number: 84.06.2017.OP.86

TITLE: Political Activity and Lobbying on Behalf of Pondera Medical Center

AREAS AFFECTED: All Areas

PURPOSE: To define certain limitations on political activity and lobbying in order to preserve the tax-exempt status of Pondera Medical Center (PMC”).

DEFINITIONS:

<i>Lobbying</i>	The practice of promoting or opposing the introduction or enactment of legislation before the legislature or legislators, or promoting or opposing official action of any public official or the legislature. Lobbying includes but is not limited to: a) Any direct communication with a public official to promote or oppose official action; b) All time spent to present oral or written testimony to one or more public officials promoting or opposing official action by any public official or group of public officials, including the legislature or a committee of the legislature; or c) Signing a sign-in sheet as an opponent or proponent of official action at a legislative hearing.
<i>Political Activity</i>	Includes efforts directed toward the success or failure of a political party, candidate for partisan political office, or partisan political group.
<i>Political Candidate</i>	A person who has publicly announced an intention to be a candidate for a national, state or local public office or is being promoted publicly to join a race and become an official candidate.
<i>PMC Resources</i>	Include but are not limited to PMC employee duty time, vehicles, mailing lists, office supplies, logos, letterheads, symbols or other identifiable marks of institutional affiliation, including photos of PMC buildings or property, equipment, computers, email accounts, copiers, telephones, bulletin boards, office space, vehicles or publications.
<i>Facilities & Property</i>	Include, but are not limited to, PMC’s Hospital, Extended Care Facility, Rural Health Clinic, Wellness Center, any office buildings and all other space and facilities owned or leased by PMC and associated grounds, parking lots, except in private vehicles, and company vehicles.

POLICY: PMC will comply with applicable federal and Montana laws and regulations on lobbying and political activity.

PROCEDURES:

Certain Political Activity Prohibited

1. No political activity will be conducted on the facilities and properties of PMC or by any agent or employee of PMC while on duty or at any meeting or function sponsored by PMC, without the express written consent or direction of the Chief Executive Officer (CEO) or the Chief Nursing Officer (CNO).
2. PMC will not, through its Board Directors, officers, employees or entities:
 - a) Participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for public office;
 - b) Donate to political candidates, political campaign organizations, political parties, and/or political action committees;
 - c) Reimburse any PMC employee for costs incurred for attendance at a political candidate campaign event.

3. A PMC employee is not prohibited from running for political office. However, an employee who is a political candidate may not use PMC resources for any type of political activity.
4. A board director, officer, employee or agent of PMC may engage in personal political activity on his or her own time, so long as the individual does not represent, suggest or imply that the political activity is supported by, or the individual is acting on behalf of, PMC.

Lobbying

1. PMC may at times ask employees, board directors and others to make personal contact with government officials to testify at hearings, write letters or take other action to present the position of PMC on specific issues. This is the only instance when personal contact with government officials may take place on behalf of PMC, other than customary contacts as a part of an employee's employment duties, without the approval of the CEO or CNO.
2. No board director, officer, employee or agent of PMC may engage in lobbying on behalf of PMC without the express consent and direction of the CEO or CNO.
3. Any individual engaging in lobbying under the express consent and direction of the CEO or CNO will maintain an accurate record of time and expenses associated with the lobbying in question and make a written report on those items to the CEO or CNO.
4. A board director, officer, employee or agent of PMC may engage in personal lobbying activity on his or her own time, so long as the individual does not represent, suggest or imply that the lobbying is supported by, or the individual is acting on behalf of, PMC.

Any questions about this policy are to be directed to, and guidance is available from, the Compliance Officer, CEO or CNO. Guidelines for carrying out this policy are provided below.

GUIDELINES:

1. Employees Speaking Out on Political Issues
 - a) Employees (including, for purposes of these guidelines, PMC board directors, officers and agents) who express themselves on political issues do so as individual citizens and not as representatives of PMC. Such individuals shall refrain from using their PMC titles or the name of PMC or one of its entities that may permit the inference that they are acting for or are endorsed by PMC.
 - b) If the individual is asked directly about his/her employment, it is appropriate to respond accurately that the individual is employed by a PMC entity, but he/she should also state or otherwise make clear that he/she is not representing or speaking on behalf of PMC. A statement such as the following can clarify this: "Please understand that I am speaking personally and not on behalf of PMC. My comments are not intended to reflect the views of Pondera Medical Center."
 - c) An employee may not use his/her PMC business card, use a PMC email address or "signature" or register at a hearing with his/her title or position at PMC.
2. Employees Involved in Political Campaigns
 - a) Employees may not use PMC resources to endorse or promote political parties, political campaigns or a political candidate.
 - b) Employees who engage in political campaigns in their individual capacities should make it clear that their actions and statements are their own and not those of PMC.
 - c) If an employee is running for political office, no campaign activities shall be conducted on PMC facilities and properties nor shall PMC resources be used in order to avoid the appearance of PMC endorsement.
 - d) Employees who expect to participate in political activity that could cause conflict with their PMC duties are expected to discuss the matter promptly with the CEO, the Compliance Officer or the CNO to ensure adherence to the policy.
3. PMC Resources will not be used for political activity.
4. The restrictions in the policy and guidelines do not apply to any employee while acting solely in an individual capacity and while on his/her own time and utilizing his/her own resources.

5. PMC will not endorse a political candidate or ballot proposal or provide/solicit financial or other support for a political candidate or political organization.
6. PMC employees remain subject to PMC employee policies if engaging in political activity during regularly scheduled work time, including while serving in an elected or appointed political office.
7. The report by an employee who is directed by the CEO to participate in lobbying activity will include the specific amount of time he/she spent engaged in such activity, rounded to the nearest quarter hour.

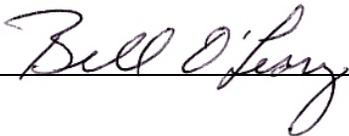
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Contact Person(s): Chief Executive Officer, Chief Nursing Officer, Compliance Officer

Executive Approval:  _____

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