



## AARP Policy on Personal Political Activity

- I. **Introduction.** AARP encourages all employees and volunteers to fully and freely exercise their right to participate in political processes, including elections, legislative activity, and government administration as they so choose, and AARP encourages them to express their appropriate personal views on candidates, public officials, and political issues. Together, these activities comprise one's "Personal Political Activity" for purposes of this policy. However, certain types of employees' and volunteers' Personal Political Activity could adversely affect AARP's ability to carry out its social mission. When AARP employees and volunteers engage in Personal Political Activity, they bear the responsibility of ensuring that their Personal Political Activity will not be attributed to AARP and that effective performance in their AARP position will not be compromised. To assist in determining what types of Personal Political Activity may affect AARP social mission goals and AARP's reputation for nonpartisanship and trustworthiness, AARP sets forth the policy below.
- II. **Scope.** This policy applies to all AARP employee and volunteer positions. All employees and volunteers should be familiar with the permitted and prohibited activities detailed in Section III. In addition, those individuals in Designated Positions—as defined below—are subject to the restrictions of Section IV, due to the sensitivity of their positions.
- III. **Personal Political Activity**
  - a. *Protect AARP's Reputation.* Employees and volunteers may participate fully in the Permissible Political Activity listed below, provided they exercise sound judgment to ensure their participation does not compromise the neutrality, nonpartisan reputation, or integrity of AARP. To that end, employees and volunteers **must disclaim as appropriate** AARP's support of their personal political statements, either in the statement itself or the statement platform.<sup>1</sup>
  - b. *Permissible Political Activity.* All employees and volunteers may engage in political activity while not on duty to the extent such activity is not prohibited by law or other provisions in this policy. Permissible political activity includes, but is not limited to:
    - i. Expressing opinions on pending or proposed legislation or other government action; the quality of a public official's job performance; a candidate's fitness for public office; a candidate platform; a political party; a political party's platform; and ballot initiatives, measures, or questions.
    - ii. Working for or engaging in political activity on behalf of a political party.

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<sup>1</sup> For example, if an employee posts a political opinion on social media, it must include a disclaimer directly in the post itself or in a clearly visible location on the employee's profile (e.g. "Tweets my own" in the profile introduction). In addition, for personal social media accounts through which official AARP communications are disseminated, personal political activity must be clearly separated from AARP communications. For those accounts, employees and volunteers are encouraged to include express disclaimers **directly in the content itself**, rather than on the account profile, when undertaking such activity.



- iii. Accepting an official or unofficial position on a political or candidate campaign.
  - iv. Soliciting or making lawful financial contributions to a candidate, candidate committee, Political Action Committee (“PAC”), or political party.
  - v. Becoming a candidate for or holding public office, provided the position is disclosed to and approved by both the employee’s or volunteer’s supervisor and the Office of General Counsel.
- c. *Prohibited Political Activity.* All AARP employees and volunteers are prohibited from:
- i. Engaging in any personal political activity while actively on duty for AARP (e.g. during regular business hours or while attending an after-hours event as an AARP representative).
  - ii. Engaging in any personal political activity using AARP resources of any type. AARP resources include—among others—AARP funds, equipment, supplies, express invocation of one’s AARP position, and the AARP name and logo. Besides amounting to unauthorized use, the involvement of AARP resources in one’s personal political activity may constitute an illegal corporate contribution or expenditure by AARP, subject to both criminal and civil action.

#### IV. **Designated Positions**

- a. *Designated Positions Defined.* Because some employee and volunteer positions have heightened visibility or sensitivity and the risk that their activity will be attributed to AARP is heightened, separate rules apply to those positions. “Designated Positions” include the Board of Directors; members of the Executive team; members of the Leadership team; state directors; state presidents; associate state directors for advocacy; associate state directors for communications; the Vice President of Social Communications; vice presidents and directors of any AARP business unit that regularly engages in advocacy efforts; editors-in-chief of *AARP the Magazine* and the *AARP Bulletin*; any employee required to register as a lobbyist at the federal or state level; and all other employees or volunteers in key, public-facing advocacy roles.
- b. *Permissible Activity for Designate Positions.* Those holding Designated Positions are permitted to engage in any political activity permissible under Section III that is not prohibited in the restrictions below.
- c. *Designated Position Restrictions.* In addition to the restrictions of Section III on all employees and volunteers, those that hold Designated Positions may not:
- i. Solicit financial contributions on behalf of a candidate, candidate committee, PAC, or political party in a public communication.



- ii. Organize a public event or participate on the host committee for a public event that supports, opposes, or solicits financial contributions to a candidate, PAC, or political party.
  - iii. Become a candidate for or hold public office without first resigning their position at AARP. Public office positions that are unlikely to involve partisan politics may be permitted through the appeal and exception process of Section VI.
  - iv. Work for or on behalf of a political party, and work for or participate in a political or candidate campaign beyond “back-office” activity. Back-office activities are those done without public recognition or official title. Examples include phone-banking, performing administrative tasks, and lending issue expertise without attribution.
  - v. Publicly endorse or oppose a candidate, candidate platform, political party, political party platform, or ballot initiative, measure, or question. An endorsement is any statement via any method of communication that expresses support or approval—including social media, yard signs, bumper stickers, and dissemination of campaign literature.
    - 1. Non-affirmative statements—such as liking, re-tweeting, or sharing about issues for informational purposes—by employees or volunteers in Designated Positions will not be considered a prohibited endorsement for purposes of this policy. However, affirmative statements, such as posting original endorsing content or adding endorsing commentary to the non-affirmative statements described above will be considered a prohibited endorsement.
    - 2. When using social media, employees and volunteers holding Designated Positions should be aware of the overall message of their social media activity. While each individual social media action may not constitute prohibited political activity under this policy, the totality of one’s social media activity may reflect a partisan stance. AARP reserves the right to interpret the entirety of a Designated employee’s or volunteer’s social media activity as a prohibited endorsement.
- V. **Violations.** Violation of this policy shall be cause for appropriate disciplinary action, up to and including discharge from the violator’s AARP position.
- VI. **Exceptions.** AARP employees and volunteers can seek an exception for any Personal Political Activity that may be prohibited by this policy by submitting a written request for review to their immediate supervisor or, for volunteers, their primary AARP staff contact. The request will be forwarded to the Office of General Counsel, which shall have sole discretion to grant an exception upon substantial justification that the prohibited Personal Political Activity will not adversely affect AARP, or to deny the exception, which denial shall be final.