



# Faculty Researchers Engaging in Policy Activities

## Compilation of University of Michigan Guidance

Researchers play an important role in sharing their knowledge and scientific work with decisionmakers, partners, and stakeholders, which allows evidence to improve decision making and tackle complex issues. Please review the University of Michigan (U-M) guidelines provided below to ensure effective engagement with external audiences.

### U-M policy priorities and neutrality bylaw

The University of Michigan's Office of Federal Relations serves as the institution's "voice" in Washington, D.C., and it is their responsibility to engage with the state's congressional delegation. They are also registered to lobby on behalf of U-M, which is an [important distinction](#) when it comes to advocacy efforts before the U.S. Congress. Executive officers, deans, senior directors, federal relations staff, and designated faculty or staff are individuals authorized to lobby on behalf of the University.<sup>1</sup>

In general, a U-M Dean, or a Director of an official U-M institute/center/program, may establish priorities for their school, college, institute, center, or program, but should coordinate with U-M Government Relations staff (State Relations, Federal Relations, Michigan Medicine Government Relations) about any activities they engage in that have governmental ramifications such as asking for law changes.<sup>2</sup>

**Neutrality bylaw:** The University of Michigan Board of Regents voted Oct. 17, 2024 to adopt a bylaw establishing a policy of institutional neutrality for university leaders. This means the university will adopt a heavy presumption against institutional statements on political and social issues that are not directly connected to internal university functions.

The bylaw applies to the president, members of the president's leadership team, deans, directors, department chairs and others authorized to speak for the university or an academic unit. It aims to foster the greatest possible degree of freedom

of expression and diversity for members of U-M's academic community. Faculty members are still free to speak and debate on issues of the day, and university leaders may speak in their individual capacity.<sup>3, 4</sup>

### U-M faculty sending Letters to the Editor (or other opinion pieces)

Certainly you can send a letter to the editor using your name. Whether it is appropriate to give a university affiliation depends on the circumstances. As a general matter, it is inappropriate in a non-work-related setting to state or imply that you represent the university, and giving an affiliation may have that effect. The easiest way to avoid even an implication that you are writing on behalf of the university is not to include your affiliation. Another alternative, though, is to include a disclaimer that your title or position is given for identification purposes only and does not indicate university support for or endorsement of the views you are advocating.<sup>5</sup>

### U-M faculty signing letters

U-M faculty are often nationally recognized experts and are welcome to sign letters with their peers, including using their title, so long as the letter:

- is not on university letterhead
- does not indicate they are representing the university

Faculty must not use university letterhead to comment on legislation, regulations or other policies since they are not doing so in the scope of their employment. If a faculty member sends a

letter as a private citizen/in their personal capacity, they should use their own personal letterhead, can use their title, and it is best to indicate this is their professional or personal view and does not represent the view of U-M.<sup>6</sup>

### **Federal restrictions on lobbying for agency-funded researchers<sup>7</sup>**

It is important to know individual federal agency restrictions on lobbying using federal funds. In general, recipients of federal funds are not allowed to use said funding to lobby federal, state, or local officials or their staff to receive additional funding or influence legislation.

#### **As an example, US Department of Health & Human Services lobbying restrictions note that recipients should not:**

- Spend federal funds to influence an officer or employee of any agency or Congressional member/staff regarding federal awards;
- Use grants funds [provided to non-profit organizations or institutions of higher education] to influence an election, contribute to a partisan organization, or influence enactment or modification of any pending federal or state legislation; or
- Expend federal funds to influence federal, state, or local officials or legislation.

### **Acting on your own behalf and using your personal time and resources**

Individuals who work at U-M may engage in policy related discussions with government officials and participate in political activities, provided they are acting on their own behalf and using their personal time and their own resources.

Using a university office or other university facility, or using other university resources, such as a university-provided telephone, computer, email address, social media account, Zoom or other web conferencing service account, etc., to support or oppose ballot initiatives or candidates running for office, **even if — per the Michigan Secretary of State — you do not state or imply that you are speaking on behalf of the university in doing so.**<sup>8</sup>

Furthermore, university policy indicates that faculty and staff should not:

- Send unsolicited mass communications unrelated to university business or activities.
- Create the appearance that U-M is endorsing, affiliated with, or otherwise supporting any organization, product, service, candidate, or position.
- Use university resources, including official university email lists, to campaign for or against a ballot initiative or candidate running for office or to conduct a political campaign.<sup>9</sup>

#### **Useful resources:**

- [OVPR “Tracking Federal Changes” Blog](#)
- [Key U-M updates related to federal orders, memos and agency guidance](#)
- [OVPR/U-M Federal Relations federal funding updates](#)
- [U-M guidance on federal lobbying and gift rules](#)

For questions or further guidance please reach out to the U-M Federal Relations team at [UM.FedRel@umich.edu](mailto:UM.FedRel@umich.edu) or IHPI’s Policy Engagement team at [ekostan@umich.edu](mailto:ekostan@umich.edu).

#### **References**

- 1 [March 2025 U-M federal funding update on advocacy](#)
- 2 U-M Office of Federal Relations, April 2025
- 3 [Regents’ Bylaw 14.08 Institutional Neutrality](#)
- 4 [Report of the Advisory Committee on the University of Michigan Principles on Diversity of Thought and Freedom of Expression](#)
- 5 <https://publicaffairs.vpcomm.umich.edu/key-issues/guidelines-for-political-campaigns-and-ballot-initiatives/#faq>
- 6 Prepared with input from U-M Federal Relations, Michigan Medicine Government Relations, IHPI and Office of the General Counsel, 2025
- 7 <https://www.hhs.gov/grants/grants/grants-policies-regulations/lobbying-restrictions.html>
- 8 <http://publicaffairs.vpcomm.umich.edu/key-issues/guidelines-for-political-campaigns-and-ballot-initiatives/>
- 9 [U-M SPG policy 601.07, section 4\(B\)](#)