Representation of Meharry Medical College before Government Entities

**Purpose:** This policy protects the credibility and consistency of communication on public policy positions taken by Meharry Medical College (MMC).

**Scope**
All employees and students of MMC are subject to the policy and the procedures.

**Definitions**
1. “**Public policy positions**”
   Official positions related to matters being considered by any governmental agency or legislative body.

2. “**Governmental entities**”
   Executive or legislative bodies of local, state, or federal government.

**Policy**

Oral or written statements of public policy positions or any communication to members of the press or governmental entities on issues or concerns of MMC must be pre-approved by the Associate Vice President of External Affairs for MMC. Persons authorized to make statements of public policy positions or make representation related to MMC must also be designated or re-designated as an individual authorized to make statements of public policy. This policy does not apply to persons authorized to make statements of public policy on behalf of MMC.

Employees and students who are corresponding with governmental entities on public policy matters should adhere to the following to ensure that their views are understood to be personal statements and are not misconstrued to be the views of MMC:

- Provide a disclaimer that they are not representing MMC or its member institutions
- Avoid expressing or indicating in any manner that the communication represents the views of MMC or its member institutions such as the use of MMC letterhead.
- Contributions to political candidates, parties, or causes must be made in the name of the individual and not MMC.

**What Constitutes Non-Compliance**
Unauthorized representation of MMC to governmental entities constitutes noncompliance.
Consequences of Non-Compliance
Consequences of non-compliance will be determined on an individual case basis by the appropriate MMC senior executive. Sanctions may range from a reprimand to termination of employment.

Requirements & Guidelines for Implementing the Policy
Internal operating procedures developed pursuant to this policy should include at a minimum:

- MMC’s Associate Vice President for External Affairs must be consulted prior to the statement being made in order to discuss the potential implications of testimony including conflicts with previous positions taken by the organization
- MMC’s Associate Vice President for External Affairs must be consulted prior to the statement being made, when proposed positions have campus-wide implications or conflicts with prior MMC positions.

Right to Change or Terminate Policy
This policy is subject to change or termination as part of an annual policy review. Proposed changes to this policy will be discussed with all affected parties.

The college’s policies are the purview of the Chief Executive Officer (CEO) and the CEO’s management team. The CEO has the final sign-off authority on all policies.

No Approval Needed
1. Dr. Jones, Chair of Meharry Medical College’s Oncology Department, is invited by the American Cancer Society to participate in a federal lobbying day to request additional funds for cancer research and care. Dr. Jones prefaces all conversations and testimony with a statement that he is speaking as a member of the American Cancer Society and not as the Chair of Meharry Medical College’s Oncology Department.

2. Dr. Smith is employed as a faculty member at Meharry Medical College. She is inspired by the Democratic Gubernatorial candidate. She hosts a campaign fundraiser at her home for the candidate.

Prior Approval Needed
3. Dr. Jones, Chair of Meharry Medical College’s Family Medicine Department, learns of proposed legislative budget cuts to the Tennessee Higher Education programs. Dr. Jones goes to the Capitol to speak with Tennessee state elected officials. Dr. Jones introduces himself as Chairman of Meharry Medical College’s Family Medicine Department and testifies on the effect the proposed cuts would have on the Department of Family Medicine at Meharry.
4. Members of the dental and medical schools collaborate to create a revolutionary wellness program. They seek additional government dollars to fund this initiative.

**Not Allowed**

5. Dr. Smith is employed as a faculty member at Meharry Medical College. She is inspired by the Republican Gubernatorial candidate. She decides to host a campaign fundraiser in the lobby of the West Basic Science Building. She sends invitations to the fundraiser on Meharry Medical College letterhead.

6. Dr. Williams is employed as a faculty member at Meharry and is interviewed by a local TV reporter. During the interview, he states that the incumbent Mayoral candidate would provide more support for Metro General Hospital and Meharry Medical College.