



PENNSYLVANIA ASSOCIATION OF COMMUNITY HEALTH CENTERS

# **Community Health Centers and VOTER ENGAGEMENT**

## **Guiding Principles**

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*The following document is intended to provide suggestions for Community Health Centers  that are interested in encouraging patients and members of the community to engage in the democratic process. This is not a legal document or a complete guide for encouraging voter registration or voter participation. If you have any questions or concerns, please contact PACHC at (717) 761-6443, extension 206 or email [jim@pachc.com](mailto:jim@pachc.com); or contact NACHC at (540) 942-3862 or email [MWetherhorn@nachc.com](mailto:MWetherhorn@nachc.com). If you have questions about the legality of a particular circumstance, it is best to contact your legal counsel and both organizations can assist you based on that guidance.*

## General Questions and Answers on Voter Registration

### Why should Community Health Centers be involved in voter registration and encourage voter participation?

Community Health Centers  nationwide care for millions of people each year and are well-respected institutions in our communities. A message about the importance of voter and civic engagement coming from such a trusted community resource will be taken more seriously and can be more effective than other organization's efforts.

### Are there risks to engaging in a voter registration drive?


If the program is run as a public service and remains nonpartisan there should be no legal concerns. The participation in partisan activities, or perception of partisanship in political activities, may jeopardize your federal tax exemption as a violation of the Federal Election Campaign Act.

### What activities can Community Health Centers engage in for voter registration?

Community Health Centers  can:

- Make voter registration cards and absentee ballots available in waiting rooms
- Allow county election boards or private *nonpartisan* organizations (for example, League of Women Voters) to staff a voter registration drive at your office. ***By all means avoid having local party representatives or partisan groups engage in voter registration activities***
- Help patient complete a registration form -- *provided that staff do not encourage or answer questions that may influence the registration of a particular political party*
- Send completed voter registration forms or absentee ballots – *provided that staff do not encourage or answer questions that will influence the voters decision* – and deliver all documents to the proper authorities in a timely fashion
- You may allow a candidate to tour your office, and candidates should be given such an invitation, but ensure that both candidates are given an equal opportunity and equal access. Invitations should be made to both candidates in the same medium, one of which should be written. PACHC can help you contact all candidate offices
- If you have multiple sites, engaging in an activity at one site means you should do the same at *all sites*.

## **What should Community Health Centers avoid?**

Community Health Centers  should NOT:

- Imply that your services are dependent on a patient or community member's decision to register to vote or cast a vote
- Allow candidates or political parties to post or distribute campaign materials (including posters and signage) in your office(s).

## **Can our center dedicate a staff person to assist patients in voter registration and charge their salary to our Section 330 grant?**

NACHC strongly recommends that health centers charge voter registration expenses to non-grant income, such as program income, or unrestricted grants or contributions. Even nonpartisan voter registration activities may be a funding risk.

## **Federal Funds and Voter Registration**

Federal funds may not be used for political purposes to support or oppose candidates for public office. This is the same restriction that applies to all 501(c) (3) organizations. This does not mean federally funded agencies cannot engage in nonpartisan activities. However, certain federal funds do come with added stipulations regarding nonpartisan activities. These restrictions specifically mention prohibitions on conducting voter registration or giving rides to the polls.

### **Who's Restricted**

The following federally supported programs have special stipulations. All others fall under normal 501(c) (3) guidelines for charities:

- Recipients of Community Social Service Block Grants
- AmeriCorps
- Legal Services
- Head Start

### **Recipients of Community Social Service Block Grants (Community Action Agencies)**

CSBG recipients such as *Community Action Agencies* (CAA) are generally restricted from conducting voter registration activities or rides to the polls. However, CAAs may conduct many other types of nonpartisan activities, particularly when using non-CSBG funds.

#### **CAAs Can:**

- Use non-CSBG funds for nonpartisan voter engagement activities, i.e. notice of Election Day and related deadlines, location of polling places, etc.
- Have staff members employed with non-CSBG funds conduct voter engagement activities.

#### **CAAs Cannot:**

- Conduct voter registration activities
- Offer rides to the polls.

### **AmeriCorps**

AmeriCorps volunteers and staff are prohibited from most active nonpartisan political activity.

#### **AmeriCorps Can:**

- Provide voter registration forms on the premises for clients

- Conduct nonpartisan voter engagement during non-working hours

**AmeriCorps Cannot:**

- Engage in political activities during work hours.

**Legal Services**

Legal Services groups are generally restricted by the Legal Services Act in conducting any kind of nonpartisan or partisan political activities.

**Head Starts**

As of 2007, Head Starts are less restricted than other agencies in their permitted political activities.

**Head Start Can:**

- Keep parents and others informed on the how, when and where to vote, such as helping them find their polling place on Election Day
- Have a nonpartisan organization offer voter registration at Head Start facilities during hours of operation.

**Head Start Cannot:**

- Use Head Start funds, or staff during work hours, to conduct partisan election advocacy
- Have staff conduct voter registration activities
- Provide rides to the polls.

## General Voter Registration Tools

### Steps to Voter Registration

*Filling out voter registration cards can be intimidating but keeping a simple and nonpartisan process will provide the best system for a registration drive. This is a quick guide for the things you should do to ensure that registrations are accepted.*

**1. Get the registration cards.** The first step is getting some voter registration cards. Cards are available through the PA Department of State (electronic versions are available [here](#)) or your county board of elections (full listing available [here](#)). Be prepared to provide information such as how many registration cards are needed, name of person making the request and contact information, organization that will be responsible for registering potential voters, etc.

To request that Pennsylvania Voter Registration Mail Applications be sent to you, email [ST-VOTERREG@pa.gov](mailto:ST-VOTERREG@pa.gov) and provide your full name and mailing address. Remember to indicate the number of voter registration forms that you require. To request multiple Pennsylvania Voter Registration Mail Applications for voter registration drives, please call 1-800-552-VOTE.

**2. Fill the card out with the person.** Make sure that they check the boxes verifying that they are a U.S. Citizen and at least 18 years old or will be 18 by November 6 (Election Day).

Make sure that they use their full residential address, not a P.O. Box. If they are homeless, there is information available [here](#).

**3. Take the card and turn it in for them.** Explain that they can mail it in, but assure them that you are turning in everyone's cards and can make sure that theirs gets to the right place in time. Then follow the instructions that appear on the registration card for mailing/delivering them. In Pennsylvania, the **LAST DAY FOR REGISTRATION CARDS TO BE ACCEPTED IS OCTOBER 9.**

**4. (OPTIONAL) Get their permission to contact them with information about the election and their polling place.** You could have a clipboard sign-up for this purpose that includes their name and preferred method of contact (phone, mail, etc.)

**5. Remind the voter TO BRING THEIR ID to the polls.** Information on how to obtain a non-driving driver's license is available [here](#) if they do not have any acceptable forms of ID. This includes the recently announced Department of State-authorized identification that can be used *only* for voting purposes. These forms of identification will still be issued by the Pennsylvania Department of Transportation.

An individual that does not have valid ID in the General Election will be given a provisional ballot that will be counted in the election once they provide acceptable forms of ID to the county board of elections within 10 days of the election (November 16). *See Page 8 for acceptable ID requirements in Pennsylvania under current law.*

**6. Deliver the cards to the Department of State or your county election board.**

## Pennsylvania VOTER ID Law

[Act 18 of 2012](#) places a new requirement for all Pennsylvania voters to show ID at polling places for every election. Previous law only required this for first time voters or an individual voting for the first time at a new polling place when moving residences. This law now applies to all voters at all elections. ID requirements in Pennsylvania under current law (all ID generally must have photo and expiration date) are as follows:

- Photo IDs issued by the U.S. Federal Government or the Commonwealth of Pennsylvania (Pennsylvania driver's license or non-driver's license photo ID also issued by PennDOT);
- Valid U.S. passport;
- U.S. military ID - active duty and retired military (a military or veteran's ID must designate an expiration date or designate that the expiration date is indefinite). Military dependents' ID must contain an expiration date;
- Employee photo ID issued by Federal, Pennsylvania, County or Municipal government;
- Photo ID cards from an accredited Pennsylvania public or private institution of higher learning;
- Photo ID cards issued by a Pennsylvania care facility, including long-term care facilities, assisted living residences or personal care homes; or
- A non-driving driver's license is available [here](#) if they do not have any of the above forms of ID. This includes the recently announced Department of State-authorized identification that can be used only for voting purposes.

For voter registration in states outside of Pennsylvania, there is a web-accessible registration ballot at NACHC's website,

[http://www.nachc.com/client/documents/National\\_Voter\\_Registration\\_form.pdf](http://www.nachc.com/client/documents/National_Voter_Registration_form.pdf).

**Persons experiencing homelessness:** People experiencing homelessness obviously do not have a conventional residential address. In some cases, the person can name the intersection of an area they spend most of their time and vote in the corresponding precinct. For more information, please refer to the following [FAQ from the Department of State](#).

**Non-citizens:** As you know if you work with an immigrant population, it is important to be sensitive to the fears that new immigrants may face when they come to receive care. A non-citizen may register to vote if they will be an American citizen by the next election. Because it is often not clear when someone's citizenship will be completed, it would be better to wait until citizenship is completed to register. There may also be an opportunity to register to vote following the formal U.S. Citizenship ceremony that naturalizing residents participate in.

There are additional Frequently Asked Questions from the Department of State available at [http://www.votespa.com/portal/server.pt/community/resource\\_center/13509](http://www.votespa.com/portal/server.pt/community/resource_center/13509).



## Registered and Ready to Vote, What Next?

It is important to remember that neither you nor your employees should influence or attempt to influence an individual voter's decisions. If someone is curious about a candidate or candidates, there are sources available that can let them know who is running for various offices.

You can refer them to the county board of elections or the Department of State. Both have on their websites, and in their offices, a full listing of everyone that will appear on the ballot in the order that names will appear on the ballot.

If they are interested in more information or access to candidate websites, there is a nonpartisan and national database hosted by Project Vote Smart at <http://votesmart.org/>. If voters provide their zip code information the website generates a list of candidates for President, Congress (U.S. Senate and House), statewide office (Attorney General, Auditor General, etc.), and Pennsylvania General Assembly (Senate and House).

More information on NACHC's *Community Health Vote* initiative is available on their website: [www.nachc.com](http://www.nachc.com).

Pennsylvania voter information, access to updates on Pennsylvania's elections and updates to the new Voter ID Law are available at the [Pennsylvania Department of State's website](http://www.votespa.com): [www.votespa.com](http://www.votespa.com).

Information on Federal election law is available at the [Federal Election Commission](http://www.fec.gov/law/feca/feca.shtml) (FEC) at <http://www.fec.gov/law/feca/feca.shtml>.