

**THE TRUSTEES OF TRINITY COLLEGE
POLICY ON POLITICAL CAMPAIGN CONTRIBUTIONS**

Trinity College Policy No. 9.3

Policy Statement

Trinity College is committed to the principle of free expression, including the exchange of political viewpoints and ideas, for all members of its community. The college encourages its students and employees to be engaged civically and to participate fully in the electoral process at all levels. Nothing in this policy on campaign contributions is intended to limit the rights of students or employees to express personal opinions or to engage in political activity in their individual capacities and as private citizens.

However, the college and its “principals” (as defined below) are subject to applicable federal, state, and local laws and regulations that place limits on certain types of political and campaign activities. In particular, Connecticut’s Campaign Finance Reform Act, Conn. Gen. Stat. § 9-612, (“CFRA”) bans certain political campaign contributions by state contractors, prospective state contractors, and their principals to:

- an exploratory committee or candidate committee established by a candidate for nomination or election to the office of governor, lieutenant governor, attorney general, state comptroller, secretary of the state, state treasurer, state senator, or state representative;
- a political committee authorized to make contributions or expenditures to or for the benefit of such candidates; or
- a party committee.

Principals of the college also are prohibited from soliciting any such contributions from Trinity employees or from college subcontractors or their principals.

This law was established to combat both actual corruption and the appearance of corruption arising from political campaign contributions by state contractors. Violations of the CFRA could result in the cancellation of an existing state contract or the denial of a prospective state contract.

Reason for the Policy

This policy establishes which contracts of the college will trigger the state contractor provisions of the CFRA, which individuals are considered principals of the college, and what contributions are legally prohibited.

Definitions

For purposes of this policy, the following definitions shall apply:

State Contract

A “state contract” is defined broadly to include contracts or agreements for:

- the rendition of services;
- the furnishing of any goods, material, supplies, equipment, or items of any kind;
- the construction, alteration, or repair of any public building or public work;
- the acquisition, sale, or lease of any land or building;
- a licensing arrangement; or
- a grant, loan, or loan guarantee.

To trigger the state contractor provisions, the state contract in question must be valued at \$50,000 or more in a calendar year for a single contract; or \$100,000 or more in a calendar year for a series of contracts.

The term state contract does not include any agreement or contract with the state, any state agency, or any quasi-public agency that is exclusively federally funded; an education loan; a loan to an individual for other than commercial purposes; or any agreement or contract between the state or any state agency and the U.S. Department of the Navy or the U.S. Department of Defense.

Principals

For purposes of this policy, “principals” of the college include:

- the president of the college;
- employees who have managerial or discretionary responsibilities with respect to a state contract;
- the spouse or dependent children of individuals described above; and
- a political committee established by the college or established or controlled by an individual described above.

Managerial or Discretionary Responsibilities

Employees with “managerial or discretionary responsibilities” with respect to a state contract are those individuals having direct, extensive, and substantive responsibilities with respect to the negotiation of the state contract. This does not include employees with solely peripheral, clerical, or ministerial responsibilities.

Dependent Child

A “dependent child” is considered a “principal” when that child is 18 years of age or older, resides in the household of a principal of the college, and can legally be claimed as a dependent on the federal income tax return of a principal of the college.

Responsible Officers

Dan Hitchell, Vice President of Finance and Chief Financial Officer

Dickens Mathieu, General Counsel and Secretary of the College (or a designee appointed by the president)

Key Offices to Contact Regarding the Policy and Its Implementation

Office of Finance

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Date of Initial Policy

The effective date of this policy is December 20, 2021.