



ADVISORY ALERT

CITY OF PHILADELPHIA
BOARD OF ETHICS

**GUIDELINES FOR CITY EMPLOYEES REGARDING OFF-DUTY VOLUNTEERING
RELATED TO THE UPCOMING DEMOCRATIC NATIONAL CONVENTION**

To avoid issues under the City political activity restrictions, select “**City Volunteers**” during the Host Committee* volunteer registration process on the Host Committee website and enter this access code: **DM16G**.

Examples of PERMISSIBLE Activity	Examples of PROHIBITED Activity
<p>City employees will be able to participate in volunteer opportunities offered by the Philadelphia 2016 Host Committee as long as those opportunities do not involve activity identified in the Prohibited Column. For example, City employees will generally be able to volunteer in these categories while off-duty from their City jobs:</p> <ul style="list-style-type: none"> • Administrative & Office Support: Provide administrative and office support that may include assisting with the Host Committee Call Center and responding to web inquiries • Hospitality & Hotels: Provide hospitality-related services at hotels, Host Committee events, the Home Away from Home Lounge, and transit stations • Operations, Logistics, & Delivery Support: Support Host Committee operations and logistics, including serving as a courier and running errands • Transportation: Support transport needs, such as passenger loading and driving • Venue and Event Support: Provide support for Host Committee events, such as the Welcome Party for Delegates, the Media Party, and PoliticalFest • Volunteer Leaders: Serve as a volunteer leader in any volunteer category listed in this column <p>Note: City employees may attend events of a candidate, political party or partisan political group, such as political rallies, conventions, and fundraisers, solely as a spectator.</p>	<p>To avoid the prohibited activity described below, City employees should select “<u>City Volunteers</u>” during the Host Committee volunteer registration process on the Host Committee website and enter access code DM16G.</p> <p>While City employees will be able to participate in most volunteer opportunities offered by the Host Committee, the following categories should be avoided because they will include some prohibited activity: (1) Press & Communications, (2) Technology & IT, and (3) Social Media.</p> <p>Also, City employees should NOT engage in volunteer opportunities in any category as follows:</p> <ul style="list-style-type: none"> • For the Democratic National Convention Committee or for the Democratic Party • Inside the Convention, which is being held in the Wells Fargo Center • Supporting Democratic caucus meetings <p>Note: A City employee may not serve as a delegate to the Convention.</p>

These general guidelines are based on information provided by the Philadelphia 2016 Host Committee. Application of ethics restrictions is fact-specific, so if you have questions regarding your proposed volunteer or other activities, please contact the Ethics Board for guidance. You can use the [Ask for Advice Function](#) on the [Board’s website](#) or call 215.686.9450.

A separate alert addresses the different restrictions for City Council employees. The guidelines in this Alert are applicable to members of City boards or commissions that exercise significant powers of government. Members of City boards and commissions with questions about the application of the political activity restrictions should contact the Ethics Board for guidance. [Board Regulation No. 8](#) provides details about the Charter political activity restrictions.

*The Host Committee is a non-partisan, non-profit organization and is not the same entity as the Democratic National Convention Committee, the Democratic National Committee, or the Democratic Party.

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Facts Provided to the Philadelphia Board of Ethics by the Philadelphia 2016 Host Committee Regarding Its Volunteer Opportunities

The Philadelphia 2016 Host Committee provided the following facts to Philadelphia Board of Ethics staff for the Board to rely upon in providing guidance to City employees regarding Host Committee volunteer opportunities in connection with the July 2016 Democratic National Convention. The Board will use the provided facts to provide guidelines identifying volunteer opportunities in which City officers and employees may or may not participate under the City's political activity restrictions.

These facts were gathered by Board staff through many communications with representatives of the Host Committee, including the following: a conversation with the Host Committee's attorney Joe Sandler on February 9, 2016, a conversation with the Host Committee's Deputy Executive Director Angela Val on February 18, 2016, a conversation with the Host Committee's Digital and Social Director Annie Heckenberger on February 24, 2016, conversations with Volunteer Director Hannah Tran on March 3, March 4, and March 17, 2016, and a Host Committee document (attached) entitled "Volunteer with the Host Committee for the 2016 Democratic National Convention." The Host Committee's attorney, Deputy Executive Director, and Volunteer Director had the opportunity to review this document for accuracy and completeness.

A. The Convention

The Democratic National Convention ("Convention") will take place in Philadelphia from July 25-28, 2016. The Convention is a presidential nominating convention held every four years by the Democratic Party. The Convention is an activity of the Democratic National Committee and is the official process by which nominees for president and vice-president are named.

The Convention itself will occur in the Wells Fargo Center. The Convention is not open to the public. The Pennsylvania Convention Center will serve as a location for Democratic Party offices and as a place for the Democratic Party to hold meetings. The Pennsylvania Convention Center will also have a "Home Away from Home" Lounge for delegates. Only those with proper credentials will be able to get into the Wells Fargo Center and working spaces in the Pennsylvania Convention Center. PoliticalFest, which is open to the public, will also be held at the Pennsylvania Convention Center.

B. The Philadelphia 2016 Host Committee

Prior to every political party convention, the hosting city forms a host committee to prepare for the convention. The Philadelphia 2016 Host Committee¹ ("Host Committee") is a non-partisan, nonprofit organization that is separate from the Democratic Party. The Host

¹ The Host Committee has in various printed and online materials and documents referred to itself as the "DNC Host Committee," which may confuse City employees and the general public, who may believe based upon that name that the Host Committee is part of the Democratic Party.

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Committee is operating as a 501(c)(3) entity and has applied for 501(c)(3) status. It is not a political organization for tax purposes or for purposes of federal campaign finance laws. A federal regulation that describes host committees provides that the principal purpose of host committees is “the encouragement of commerce in the convention city, as well as the projection of a favorable image of the city to the convention attendees.” 11 C.F.R. § 9008.50-52. This correctly describes the Philadelphia 2016 Host Committee’s purpose. The principal purpose and mission of the Host Committee is to showcase Philadelphia and ensure that delegates, media, and others attending the Convention have a good experience with the City of Philadelphia. The Deputy Executive Director of the Host Committee explained that regardless of which political party were having its convention in Philadelphia, the Host Committee’s goal is to ensure that Philadelphia as the host city looks great and that people have a great time while here for the convention. The mission of the Host Committee is to provide all facilities, supplies, services, and goods needed for the infrastructure to put on the Convention. The Host Committee is responsible for the infrastructure for the Convention, including the rental and logistical preparation of the Wells Fargo Center, the provision of transportation and office space for individuals working on the Convention, including Democratic Party staff, communications, and technology. Essentially, everything logistical (but not the actual political program) is provided by the Host Committee.

The Host Committee will work with the Democratic National Convention Committee (DNCC) to accomplish the Host Committee’s mission. The Host Committee has three contracts with the DNCC: 1) the Master Agreement to which the Host Committee and the DNCC are parties; 2) the City Agreement to which the DNCC, the Host Committee, the City of Philadelphia, and the Pennsylvania Convention Center Authority are parties; and 3) the Venue License Agreement to which the DNCC, the Host Committee, and Wells Fargo Center are parties. The City Agreement and the Venue License Agreement are attached as exhibits to the Master Agreement. Under the City Agreement, the City of Philadelphia has agreed to render certain City services to support the Convention.

The Host Committee and DNCC each have their own fundraising events for themselves, but DNCC fundraising events have to be paid for by the Democratic Party itself. Host Committee volunteers by law cannot assist with Democratic Party fundraising events. Under Federal Election Commission rules, within certain categories and certain constraints, the raising and spending of private funds by the Host Committee does not constitute a political contribution to the Democratic Party and is subject to audit to ensure that it does not cross these lines.

C. Volunteering with the Host Committee

1. Overview and Process

The Host Committee anticipates it will need to recruit, train, and deploy 10,000 volunteers with all sorts of different roles related to the Convention. The Host Committee is contractually bound to recruit, train, and deploy 7,000 volunteers. The Host Committee

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began volunteer recruitment efforts last year and maintains a database that will be used to track volunteers and provide them with assignments. The Host Committee will accept volunteers until at least the end of May and expects the vast majority of recruitment to occur close in time to the Convention. Volunteer opportunities related to the Convention will almost exclusively go through the Host Committee. The Democratic National Convention Committee will have very few volunteers itself, but the Host Committee will also work with the Democratic National Convention Committee to identify areas where the DNCC or the Democratic Party may need volunteers and will provide them with volunteers when requested. Both the Democratic National Convention Committee and the Host Committee will pull volunteers from the same pool of 10,000 volunteers maintained by the Host Committee. Individuals are welcome to sign up to volunteer regardless of their background and affiliations. Volunteer assignments are not dependent upon or affected by an individual's political affiliations or identification in any way.

The Host Committee is throwing three major events. These events are not official business of the Democratic Party or Convention events; the events are Philadelphia's way of "saying welcome to Philadelphia and we're happy you're here." These three events are invitation only and are not open to the general public.

First, the Host Committee will throw a party for volunteers on July 21, 2016. Volunteers may need to assist at this event. Second, the Host Committee will throw a media party on July 23, 2016 that will be attended by network anchors and other members of the media. Volunteers will assist at this event. The Convention is the largest media event in the world, and over 15,000 domestic and international media personnel are expected to be in Philadelphia for the Convention. Finally, on July 24, 2016, the Host Committee will throw a welcome party for delegates and their families. Volunteers will also assist at this event.

There are also a number of other events that will require volunteers. For instance, the Host Committee is also in charge of PoliticalFest, an interactive exhibition on politics, political history, government and the road to the White House that is open to the general public. PoliticalFest is a non-partisan exhibition that combines multi-media and interactive displays, historical objects and special guest appearances designed to entertain and engage residents and convention attendees alike. PoliticalFest displays will not be limited to Democratic Party memorabilia but will also include Republican Party materials. PoliticalFest is designed to engage visiting Convention delegates outside of official Convention events and offer residents an opportunity to participate in the fun and excitement surrounding the Convention in Philadelphia.

When signing up to volunteer, the prospective volunteer will create an individual password-protected account and profile via the myTRS volunteer management system. The general volunteer process for City employees is as follows:

- 1) Visit phldnc.com/help-make-history
- 2) Click "Volunteer Sign Up."
- 3) Then, click "Register Here."

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- 4) Select "City Volunteers" and input the unique access code: DM16G.
- 5) Once unlocked, click the green "Next" button to continue with registration.
- 6) The process is fully complete when the prospective volunteer clicks the confirm button. Shortly thereafter, a confirmation email will be sent.

Each volunteer's information becomes part of the volunteer database and provides the Host Committee with a sense of how the volunteer's skills match the Host Committee's volunteer needs. The Host Committee notifies volunteers as to which categories they will be assigned for volunteering and provides them with information about training. City employees should select "City Volunteer" during the volunteer registration process and enter an access code, DM16G, that the Host Committee has created for City employees. In this way, the Host Committee will avoid assigning City employees to volunteer opportunities that could cause issues under the City political activity restrictions. For instance, the Host Committee will not assign City employees to volunteer for the DNCC, which includes volunteer support inside the Convention, or to provide support to Democratic Party offices or Democratic Party meetings that will be located at the Pennsylvania Convention Center. Board staff has conveyed the types of volunteer activity that would cause issues for City employees under the political activity restrictions to the Host Committee's Volunteer Director.

Volunteers will be needed for a variety of functions, which are more fully described below. The majority of volunteer positions will involve providing hospitality at events. For instance, volunteers may check bags, provide directions, clap for incoming delegates, staff a "Home Away from Home" Lounge, or otherwise generally assist delegates, media, and others in town for the Convention. Volunteers will also be needed to assist with PoliticalFest such as by taking care of ticketing.

Volunteers who work in their jobs from 9am-5pm will still have the opportunity to volunteer. Although volunteer activity will vary from day to day, opportunities will generally be available throughout the day. For example, greeters will be needed at the airport and train station from early morning to late at night. Additionally, volunteers will be needed at all times to staff the "Home Away from Home" Lounge, which is a space at the Pennsylvania Convention Center for Valley Forge-based delegates to congregate and to use as a satellite workspace, as their hotel rooms are located far away. Volunteer opportunities will also be available during the weekend of July 23 and July 24, providing volunteers further opportunity to honor work schedules.

As a general rule, Host Committee volunteers will not be needed at the Pennsylvania Convention Center because it is a workspace for the Democratic Party, with the exceptions of PoliticalFest, which is open to the public, and the "Home Away from Home" Lounge.

Similarly, there will be limited volunteer opportunities in the perimeter of and inside the Wells Fargo Center where the Convention is being held. However, the vast majority of volunteer opportunities will not be at the Wells Fargo Center and will not involve volunteers being at the Wells Fargo Center or the perimeter of the Wells Fargo Center.

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The DNCC will select and recruit its own volunteers to volunteer inside the Convention. In the event that the DNCC needs additional volunteers to work inside the Convention, the DNCC will then ask the Host Committee to provide additional volunteers. All volunteers who will be located at the Wells Fargo Center will be volunteering for the DNCC. All volunteers who will be located inside the Convention will be volunteering for the DNCC. Moreover, unless individuals possess the necessary credentials, they will be unable to get inside the Wells Fargo Center. The majority of volunteers will not receive credentials to enter the Wells Fargo Center.

Some Host Committee volunteer opportunities will involve supporting Democratic caucus meetings, which are meetings at which delegates and alternates discuss business of the Democratic Party, but the vast majority of Host Committee volunteer opportunities will not involve support of political party meetings, such as caucus meetings. No Host Committee volunteer opportunities will involve supporting meetings of the Democratic National Convention Committee. No Host Committee volunteer opportunities will involve support of fundraising events for the Democratic Party, the Democratic National Convention Committee, or for any candidates. No Host Committee volunteer opportunities will involve supporting events that are campaign events or specific to promoting a particular candidate, such as a party for candidate staffers and supporters.

2. Specific Volunteer Categories from the Host Committee's Document Entitled "Volunteer with the Host Committee for the 2016 Democratic National Convention"

This section provides additional facts specific to each particular category identified by the Host Committee as a sector that will require volunteers. The quoted language is taken from the Host Committee's Document, "Volunteer with the Host Committee for the 2016 Democratic National Convention."

"Volunteer Leaders are team captains, who manage groups of volunteers and assist with deployment and field support. Leadership roles are suited to those with high levels of organization, management, and coordination."

- The Host Committee clarified that such volunteer leaders would be volunteer leaders for a specific category of volunteerism. For instance, an individual could be a volunteer leader for the Administrative and Office Support category and would then not be involved in other categories such as Press and Communications.

"Administrative and Office Support volunteers man the Call Center, respond to web-based inquiries, and provide language and translation services."

- The Host Committee clarified that the "Call Center" refers to the Host Committee's Call Center, not a DNCC or Convention call center.

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- While volunteers in this category would support both the Host Committee and the DNCC, the Host Committee stated that it could easily separate out volunteer opportunities that support the Host Committee versus those that support the DNCC and would be able to make sure that City employees did not provide support to the DNCC.

“Hospitality and Hotels volunteers ensure that delegates and visitors have a positive stay in Philadelphia. Volunteers may be greeting at hotels, the airport, 30th Street Train Station, and SEPTA transit stops as well as providing support at various hotels. Additionally, volunteers will be ambassadors throughout the Center City and historic Old City districts.”

- The Host Committee clarified that these volunteer opportunities include support like providing information to delegates about navigating Philadelphia, Philadelphia’s bus and subway systems, and tourist destinations.

“Operations, Logistics, and Delivery Support volunteers ensure that processes, materials, and distributions are managed efficiently. Volunteers may serve as couriers and runners and respond to operational requests for support.”

- No volunteer opportunities in this category will involve volunteers entering the Wells Fargo Center or assisting with logistics and set-up prior to the Convention.
- The Host Committee clarified that these volunteers may be going back and forth between the Wells Fargo Center and other places.
- One instance of support in this category would be volunteers acting as runners. For instance, perhaps an individual needs a walker and the walker was misplaced during security checks. One volunteer would try to locate a temporary walker while another volunteer would search for the missing walker.

“Press and Communications volunteers assist the Communications team with media logistics, press inquiries, engaging visiting press and similar responsibilities during the Convention.”

- The Host Committee clarified that all volunteers in this category will need to have a communications or public relations background. Volunteers in this category will assist media personnel in general and the press and media departments not only for the Host Committee but also for the Democratic Party and DNCC. Volunteers will not have anything to do with the message being transmitted or with writing press releases. Instead, volunteers will assist with checking media credentials and distributing information. Volunteers may also assist with items like providing copying and faxing services and other media logistics.

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- Volunteer opportunities in this category will not occur inside the Wells Fargo Center but will occur inside the initial security perimeter, just outside of the Convention.

“Social Media savvy volunteers digitally capture and post stories to increase the online visibility of the convention’s historic events.”

- The Host Committee is still in the process of finalizing what volunteering with this category will entail during Convention week but have specified various sub-categories for social media, including: food and drink; arts and culture; history; innovation; outdoors; academia; science and technology; and real-time news.
- The main goal of the Host Committee’s social media category is to showcase how amazing Philadelphia looks during the Convention. Social media accounts are solely focused on spotlighting Philadelphia and its status as a world-class city with world-class offerings that folks can enjoy.
- The Host Committee estimates that they will probably need only 50 volunteers or so for this category.
- The Host Committee has a social media team that will vet all posts, tweets, and other social media messages before they go live.
- Host Committee volunteer opportunities in the social media category may involve political content, which means content that supports the success or defeat of a political party or candidate or that links to materials created by candidates, campaigns, or political parties. For this reason, representatives of the Host Committee suggested that this may be one volunteer opportunity to flag for City employees to avoid.
- Volunteers in this category may re-tweet a post from a candidate, tag Democratic Party posts for the Host Committee, or share tags with the Democratic Party. Volunteers may re-tweet, share Facebook posts, or otherwise forward photographs and posts put forth by the Democratic Party.
- Volunteers may help the Host Committee issue a post regarding candidates (e.g. a specific candidate sighting in Philadelphia). Further, once a candidate is chosen, the Host Committee may post or tweet a message, saying, for instance, “Congratulations, [Candidate]! On to the White House!”

“Technology and IT volunteers provide technical support and expertise. Volunteers respond to incoming queries and support technical logistics as needed.”

- The Host Committee clarified that IT volunteers will not assist candidates and will provide assistance with technological infrastructure at Host Committee offices, at the Wells Fargo Center, and inside the Pennsylvania Convention Center.
- Some volunteers in this category will provide on-site support at both the Wells Fargo Center and the Pennsylvania Convention Center as opposed to providing support from an offsite location. These volunteers would not be providing

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- remote support for these locations.
- The Host Committee also explained that it may have some technology and IT needs but that the bulk of volunteers in this category would support the DNCC.

“Transportation volunteers facilitate transit and loading for shuttle buses, SEPTA subway stops, and other driving needs.”

“Venue and Event Support volunteers ensure that events run smoothly. They may be greeters, credential checkers, hall guides, and runners at various convention-related and Host Committee events.”

- Host Committee events are not candidate events and do not involve coordination with candidates. Volunteers in this category will greet folks and will check credentials.
- The Host Committee suggested that actual Democratic Party caucus meetings should be off limits for City employee volunteers and that City employees cannot volunteer at any Democratic Party caucus or Democratic Party meetings.

In the course of conversations with Mr. Sandler and Ms. Val regarding volunteer opportunities, they both separately suggested that in light of the City’s political activity restrictions as explained to them briefly during the course of respective conversations that City employees will probably need to avoid volunteer opportunities inside the Wells Fargo Center and the Pennsylvania Convention Center, with the exception of PoliticalFest and the “Home Away from Home” Lounge. Mr. Sandler and Ms. Val also cautioned that City employees probably need to avoid volunteering in the Social Media and Press and Communications categories. Ms. Tran agreed with her colleagues and further suggested that City employees should avoid volunteering in the Technology and IT category.