



Commonwealth  
of Massachusetts

## *OCPF Online*

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### Advisory Opinion

April 24, 2002

AO-02-18

Andrew R. Hinkel, Office Manager  
Jill Stein for Governor Campaign  
P.O. Box 440197  
Somerville, MA 02144

Re: Harvard University Externship

Dear Mr. Hinkel:

This letter is in response to your April 3, 2002 request for guidance regarding whether a stipend an intern receives from his university for the time he works with your campaign would be considered a contribution to the campaign from the university under the campaign finance law.

You have stated that the Harvard University Institute of Politics (the University) provides stipends for undergraduate students returning to Harvard next fall to allow students to participate in public sector internships.

The internships are intended to enable the University to provide its returning students with financial aid while at the same time providing the students with the opportunity to pursue summer employment within their field of study to enhance their educational experience. The internships may be in local, state or federal government as well as for public interest groups, non-governmental organizations and political campaigns. Students must find the internships themselves. Students chosen for the stipends will receive up to \$2,500 to cover living expenses so that they can accept an internship, which must be at least six weeks long and full-time, as a summer job. Stipends will be awarded based on the substance, location, and value of the job as well as the student's financial need.

The University makes no distinction between the criteria for granting stipends given to students who will work for political campaigns and those given to students who will work in other public sector internships. These stipends are given to the students who will work for political campaigns without regard to the identity or ideology of the candidate or committee.

Question

Would such a stipend be considered a contribution to the campaign from the university under the campaign finance law?

Answer No. The stipend would accrue to the benefit of the student, as a part of his educational program, and as such would not be a contribution to the campaign.

Discussion

The campaign finance law defines a contribution as a “contribution of money or anything of value to a...candidate...for the purpose of influencing the nomination or election of said candidate.” See M.G.L. c.55, §1.

The payment of the stipend, as you have described in your letter, is to the student and the terms of the stipend program would apply equally to this intern as to the other students accepting internships with public sector entities as well as with political committees. The University would not be treating this intern differently because he is working for a political committee and would not be providing the stipend because the student is working for a particular candidate. Hence, the stipend would not be paid for the purpose of benefiting the Committee. Instead, its purpose would be to enable the University to provide its returning students with financial aid while at the same time providing the students with the opportunity to pursue summer employment within their field of study to enhance their educational experience. Accordingly, where the student has selected the political committee independent of the University and the University will provide a stipend in the same manner regardless of the political committee selected, the intern’s acceptance of such stipend would be consistent with the campaign finance law.

This opinion is solely in the context of M.G.L. c. 55 and is based solely on the representations made in your letter and in telephone conversations with our staff. Should you have additional questions, please do not hesitate to contact this office.

Sincerely,

A handwritten signature in cursive script that reads "Michael J. Sullivan". The signature is written in black ink and is positioned to the left of a vertical line that extends downwards from the end of the signature.

Michael J. Sullivan  
Director