Established 1915
BROWARD
County Public Schools

STANDARD OPERATING PROCEDURE

Political Activities

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SOP Number	SOP-COMM-1232
Responsible Office	Office of Communications- Legislative Affairs
Coordinating Offices	Office of the General Counsel; Human Resources; Chief of Staff; Office of Communications; Finance; Information Technology; Benefits/Leaves
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Review Cycle	At least every two years and whenever Policy 1232 or related brand standards change
Supersedes	Adopted: 10/23/2026
Approval	

1. Purpose

The District is committed to maintaining a safe, orderly, and positive educational environment that supports students' academic growth and participation in school-sponsored activities. Political, commercial, and other non-school-related activities on District property or at District-sponsored events shall be regulated in a lawful and viewpoint-neutral manner to prevent material disruption, coercion, interference with school operations, or obstruction of access while preserving applicable constitutional and statutory rights.

This document is intended to establish a Legislative Affairs-administered process for staff political activity, protection of public resources, candidate notification, leave requests, use of District-produced media, and post-election review in accordance with School Board Policy 1232 and applicable federal, state, county, municipal law, while recognizing employees' rights to engage in lawful political activity during off-duty hours.

2. Authority and Related Materials

- School Board Policy 1232, Political Activities
- Federal law
- F.S. 104.31, Political activities of state, county, and municipal officers and employees.

- F.S. 106.011, Definitions, and F.S. 106.113, Expenditures by local governments.
- F.S. 110.233 and F.A.C. 60L-36.002, as cited in Policy 1232 and as determined applicable by the Office of the General Counsel.

3. Scope

This SOP applies to all staff members employed by The School Board of Broward County, Florida (SBBC). Its resource-protection, technology, facility, communications, and media-control requirements also apply, as appropriate, to departments, schools, contractors, vendors, volunteers, and other persons granted access to District resources. Board members are governed by applicable law and Board procedures; the specific media provision in Section 7.4 reflects the use permitted by Policy 1232.

This SOP also applies to political, commercial, and other non-school-related literature, displays, and activities occurring in or on SBBC-owned, occupied, or used buildings, grounds, school buses, and other District facilities, as well as at school-sponsored academic, extracurricular, and athletic activities wherever conducted. It also applies when District facilities are used as polling places, subject to controlling election laws and directives.

4. Definitions

Term	Definition
Candidate	A staff member who has qualified for election to an elective office or otherwise meets the applicable legal definition. For the mandatory notification process in this SOP, qualification for election is the triggering event stated in Policy 1232.
Communications media	The media described in F.S. 106.011 and Policy 1232 including broadcasting, newspapers, magazines, outdoor advertising, printing, direct or electronic mail, the Internet, social media and digital platforms, telephone services, and other covered means of disseminating a message.
District resources	Public funds and District-controlled time, facilities, equipment, supplies, copy or reproduction services, technology, accounts, networks, data, vehicles, personnel, staff assistance, communications channels, and media content.
Duty hours / on duty	Time during which an employee is required or authorized to perform District duties, excluding approved leave and bona fide off-duty periods, subject to applicable employment rules and agreements.

Term	Definition
Political activity	Activity undertaken to support, oppose, promote, or participate in a political campaign or event, candidate, party, committee, ballot issue, referendum, or amendment, or to hold public office.
Political advertisement	The meaning adopted in Policy 1232 and F.S. 106.011: a paid expression in a communications medium that expressly advocates the election or defeat of a candidate or approval or rejection of an issue, subject to statutory exclusions.
Public funds	All money under the jurisdiction or control of the District, as provided in F.S. 106.113 and Policy 1232.
District-produced media	Video, photography, programming, recordings, graphics, printed or digital content or marketing products, or other content created, commissioned, funded, or produced by the SBBC, a District department, or a school.

5. Roles and Responsibilities

Role	Responsibility
Chief of Staff	Receives candidate notifications coordinated by the office of Legislative Affairs; reviews campaign-conduct explanations; authorizes any exception involving District-produced media; directs compatibility and leave reviews.
Legislative Affairs	Administers this SOP; serves as the central intake and compliance-coordination office; reviews submissions for Policy 1232 requirements; implements school facility use operations during elections in accordance with Section 101.71(5), Florida Statutes, which provides that public, tax-supported buildings must be made available for use as polling places upon the request of the Supervisor of Elections; assigns and tracks interdepartmental reviews; communicates consolidated determinations; maintains the central compliance record; coordinates training, monitoring, and SOP updates. Coordinates polling-place access, facility use, signage locations, and operational requirements with the Supervisor of Elections Office. The office of Legislative Affairs does not handle site

Role	Responsibility
	logistics, payroll matters, overtime processing, reimbursement procedures, or related administrative functions. Payroll, time entry, overtime, reimbursement, custodial support, facilities access, or other operational logistics is reviewed, sourced, and/or coordinated through the appropriate administrative departments to ensure accuracy and proper routing.
Human Resources	Provides employment, leave, labor-relations, and personnel guidance; reviews schedule and duty impacts; administers leave; maintains official personnel and leave records; supports post-election compatibility review.
Office of the General Counsel	Advise on legal interpretation, public-funds restrictions, uncertain or exceptional communications, campaign-related media use, conflicts, and alleged violations. After review of operations of BCPS support to the SOE in an election, provides an internal acknowledgement of the District being in full compliance of state statute, or otherwise if the non-compliance issues were identified.
Office of Communications	Reviews District communications and media-use questions; protects District-produced media; routes requests requiring permission from the Chief of Staff.
Finance/ Procurement	Prevents expenditure, authorization, purchase, reimbursement, or acceptance of public funds for prohibited political advertising or elector communications. For operations of SOE support, Facilities designee and/or school administrators may channel financial impact matters to Finance department for review, determination, and execution.
Information Technology	Protects District systems, accounts, devices, networks, data, and digital content from prohibited political use and preserves information when review is required. Provides support to streamline directory access and communication of operations, as deemed necessary.
Supervisors and school/department leaders	Maintain separation between District work and political activity; promptly refer questions or suspected noncompliance to the office of Legislative Affairs; consult Human Resources before employment-related corrective action.
Staff members	Keep political activity off duty and separate from District resources; notify the Superintendent upon qualifying; request leave through established procedures; report post-election dual responsibilities.

6. Standards

- School Board staff shall not participate in a campaign for elective office while on duty.
- Public funds shall not be used for political advertisements or other communications to voters concerning a candidate, issue, referendum, amendment, or other matter subject to a vote.
- Staff engaging in political activities or holding public office shall not use District time, facilities, equipment, supplies, technology, or personnel for those activities.
- Telephone use for political activities during duty hours is limited to emergencies and must not interfere with school duties. Staff shall discourage campaign-related calls to them during duty hours.
- District-produced videos and programming shall not be used for political campaign advocacy. Editing, embedding, or distributing such material requires the Superintendent's permission; direct links to complete videos may not be used in political campaigns.
- A staff member who qualifies as a candidate for elective office shall immediately notify the Superintendent and submit a written explanation of how the campaign will comply with State law and this policy.
- Candidates may request unpaid personal leave through established procedures and shall comply with Florida laws governing political activity by public employees.
- A staff member elected to an office with part-time duties shall promptly report the election to the Superintendent so the compatibility of both roles and any need for unpaid leave can be evaluated.

7. Procedure

7.1 Submission and Review of electors concerning ballot measures

1. Before releasing a District communication to electors concerning a ballot measure, the originating office shall submit the proposed communication, intended audience, distribution method, and publication date to the Office of Legislative Affairs through the designated review process at least five business days before the planned release.
2. The Office of Legislative Affairs shall review the submission for Policy 1232 compliance and coordinate with the Office of Communications on the review of content and distribution, and the Office of the General Counsel on the review of uncertain, exceptional, or time-sensitive legal issues.
3. The Office of Legislative Affairs shall review and communicate whether the proposal is cleared, cleared with conditions, returned for revision, or not approved. A communication may proceed only after all required approvals confirm that it is authorized by law and is accurate, fair, and impartial. Silence is not approval.
4. The office of Legislative Affairs shall maintain the central compliance record. The originating office shall retain the final content, approvals, distribution record, and supporting legal or administrative guidance required for its operational files.

7.2 Employee notification to the District upon qualifying for election

1. A staff member who qualifies as a candidate for elective office shall immediately submit written notice to the Office of Legislative Affairs, using the form or template designated by the Office of Legislative Affairs,
2. The notice shall identify the office sought, jurisdiction, qualifying date, election date, anticipated campaign period, current District position, and work schedule.
3. The staff member shall provide a receipt acknowledging a campaign-conduct guidelines, provided by the Office of Legislative Affairs, explaining how campaigning will remain off duty, how District resources and personnel must be protected, how constituents and campaign interactions must be directed away from duty hours, and whether leave or schedule changes may be needed.
4. The Office of Legislative Affairs shall acknowledge receipt, and notify the Chief of Staff and Human Resources.

7.3 Request for personal leave without pay

1. A candidate seeking personal leave without pay shall use the established Human Resources leave procedure and comply with applicable notice, documentation, approval, payroll, benefits, and return-to-work requirements.
2. A leave request is not approved until the employee receives written confirmation from the authorized District office.
3. Human Resources shall coordinate the leave decision with applicable policy, contract, collective bargaining, operational, and legal requirements and shall provide the office of Legislative Affairs with the status and final disposition necessary to complete the Policy 1232 compliance record.

7.4 District-produced video, photographs, programming, official seal and logos, and other materials

Campaigns, candidates, employees, or third parties shall not use District-produced video, photographs, and programming, official seal and logos, and other materials for campaign advocacy or edit, embed, distribute, or directly link to complete District video files for campaign use without prior consent by the Chief of Staff.

1. Requests involving District-produced media shall be submitted to the Office of Legislative Affairs with the content, proposed excerpt or link, intended message, platform, audience, duration, and campaign relationship.
2. The Office of Legislative Affairs shall coordinate with the Office of Communications to review the submission, and consult with the Office of the General Counsel, when required. Legislative Affairs shall coordinate the routing of any request requiring permission of the Chief of Staff and retain the written decision.
3. Permission must be obtained before use.

4. School Board members may use videos or photographs of themselves engaged in their normal activities as School Board members, as provided in Policy 1232, subject to applicable law and Board procedures.

7.5 Report election results and evaluate dual responsibilities

1. A staff candidate elected to an office requiring part-time responsibilities shall immediately notify Human Resources after the election.
2. The employee shall provide the office, term, statutory duties, meeting schedule, compensation, anticipated time demands, conflicts, and requested leave or schedule arrangements.
3. Human Resources shall coordinate supervisory and provide the consolidated information to the Chief of Staff, who shall evaluate compatibility of the two responsibilities and may require periodic reassessment or personal leave without pay.
4. Human Resources shall track the determination and any periodic reassessment. The employee shall immediately report any later change that could affect compatibility, attendance, performance, conflicts, or use of District resources

7.6 Report and address suspected noncompliance

1. Employees shall report suspected misuse of District funds, technology, facilities, personnel, or media to a supervisor, and another authorized reporting channel. A receiving supervisor or office shall promptly notify the Office of Legislative Affairs.
2. The Office of Legislative Affairs shall review and report the compliance referral, ensure preservation of relevant records, and coordinate review by Human Resources, the Office of the General Counsel, Finance, Information Technology, Office of Communications, or law enforcement as appropriate.
3. Any corrective or disciplinary action shall be administered by the authorized office in accordance with applicable law, policy, contract, collective bargaining, due process, and District procedures.

8. Records

The Office of Legislative Affairs shall maintain the central Policy 1232 compliance record, including candidate notifications, ballot-related communications reviews, media-use requests, and related correspondence. Human Resources shall maintain official personnel, leave, payroll, benefits, labor-relations, and employment-action records. Each coordinating office shall maintain its subject-matter review and operational records under the applicable records-retention schedule and confidentiality requirements

9. Training and Monitoring

- The Office of Legislative Affairs shall coordinate periodic Districtwide guidance and training, particularly before candidate qualifying periods and elections, with subject-matter participation from Human Resources, Office of Communications, Finance, Information Technology, and the Office of the General Counsel.
- Finance, Procurement, Office of Communications, Human Resources, and Information Technology shall incorporate the applicable restrictions and referral requirements into departmental controls, Business Practice Bulletin (BPB), and training.
- The Office of Legislative Affairs shall monitor candidate submissions, communication reviews, compliance referrals, response times, recurring questions, and corrective actions and shall coordinate recommendations for policy, SOP, BPB, form, or training updates.
- The Office of Legislative Affairs shall lead the review of this SOP at least every two years and whenever Policy 1232 or relevant election, ethics, leave, technology, or communications requirements change

10. Recommendations: Business Practice Bulletin (BPB) Development

- **Ballot measure communications review (Section 7.1):** Develop a Legislative Affairs BPB establishing the designated submission process. It should identify the intake address or system; require the proposed content, intended audience, distribution method, and planned publication date; and explain how originating offices submit materials at least five business days before release. Include a tracking method, routing to Communications and the Office of the General Counsel when needed, the four possible review outcomes, written approval requirements, and instructions for resubmitting revised content. Specify how the final communication, approvals, and distribution record are retained.
- **Employee candidate notification (Section 7.2):** Develop a Legislative Affairs BPB with a candidate notification form or template, submission instructions, and an acknowledgment process. The form should collect the office sought, jurisdiction, qualifying and election dates, anticipated campaign period, District position, and work schedule. Include campaign-conduct guidance and an employee acknowledgment, along with the steps for notifying the Superintendent or designee and Human Resources and documenting receipt.
- **Candidate leave without pay (Section 7.3):** Human Resources should develop or update its leave BPB to identify the applicable request form, submission channel, required documentation, review and approval offices, and written notice of the decision. Address payroll, benefits, return-to-work steps, and how Human Resources provides Legislative Affairs with the status and final disposition for the central compliance record.
- **Requests to use District-produced media and materials (Section 7.4):** Develop a Legislative Affairs and Communications BPB with a request form and designated submission channel for proposed campaign-related use of District-produced content. Require the content or proposed excerpt or link, intended message, platform, audience, duration, and relationship to the campaign. Specify review by Communications, consultation with the Office of the General Counsel when needed, routing for the required permission, written notice of the decision, and retention of the request and decision. State that the material may not be used before written permission is issued.

- **Post-election review of dual responsibilities (Section 7.5):** Human Resources should develop a BPB and employee reporting form for staff elected to an office with part-time responsibilities. Require the office, term, duties, meeting schedule, compensation, anticipated time demands, potential conflicts, and proposed leave or schedule arrangements. Establish the process for obtaining supervisory input, forwarding a consolidated review for a compatibility determination, documenting any conditions or leave requirements, scheduling reassessments, and reporting later changes.
- **Reports of suspected noncompliance (Section 7.6):** Develop a Legislative Affairs BPB identifying the authorized reporting channels, information to include in a referral, and the steps a receiving supervisor or office must take to notify Legislative Affairs promptly. Include procedures for preserving relevant records, assigning subject-matter reviews, documenting findings and the consolidated disposition, and referring any corrective or disciplinary action to the office with authority to administer it.
- Each BPB should name the responsible positions, forms, intake channel, routing and approval steps, internal response targets, escalation points, and custodian of records. Legislative Affairs should maintain a central tracking record that links submissions, referrals, written decisions, and final dispositions while each coordinating office retains its own operational or personnel records under applicable requirements.