Questions and Answers on Health Center Voter Registration Activities

Q. Can a health Center participate in voter registration activities?

Yes. Voter registration activities may include making available voter registration materials to patients, encouraging patients to register to vote, assisting patients with completing registration forms, sending completed forms to the election authorities, providing voter registration materials in waiting rooms, and allowing private, non-partisan organizations to conduct on-site registration. Further, health centers that have out stationed Medicaid eligibility workers on site (either public employees or health center employees with delegated authority) may be required to do voter registration under the National Voter Registration Act, also known as "Motor Voter."

Q. Are there any limits on a health center’s voter registration activities?

Yes. HRSA’s Bureau of Primary Health Care has stated that a health center can participate in voter registration activities so long as they do not use their Section-330 funds to support voter registration activities and so long as the center’s voter registration activities do not impair their efforts in carrying out its Section 330-funded health center scope of project. In addition, voter registration activities must be nonpartisan and be conducted in accordance with other applicable laws. HRSA’s guidance on voter registration activities, and helpful Q &As may be found at https://bphc.hrsa.gov/programrequirements/scope/voter-requirements.

Q. What are the risks if a health center does voter registration?

A health center that does voter registration as a public service and remains nonpartisan has nothing to be concerned about. However, participating in partisan political activities will jeopardize a center's federal tax exemption and may violate the Federal Election Campaign Act. In addition, health centers that are part of a multi-service organization should keep in mind that some federal programs, e.g., AmeriCorps, prohibit voter registration activities entirely. It is important, therefore, to assess whether there are any restrictions on voter registration imposed by a funding source (other than HRSA).

Q. What kind of nonpartisan voter registration activities are allowed?

Health centers can make voter registration materials available for patients in waiting rooms and allow local voter registration officials or private nonpartisan organizations, such as the League of Women Voters, to do voter registration on-site. Health centers also can encourage patients to register to vote, help patients to complete registration forms, and send completed forms to the election authorities, as long as they do not suggest how patients should vote or that patients should register as members of a particular political party.

Q. Are there other things to avoid when a health center does voter registration?
Q. Sometimes our local political parties conduct voter registration drives. Can a health center allow a political party to do voter registration at a center facility?

This would be permitted only if the center gives all political parties an equal opportunity to do on-site voter registration. Otherwise, the center could be viewed as favoring one party or candidate over another. Even so, it is not advisable to allow political parties to do on-site voter registration unless the center can be completely assured that a political party will not use the opportunity to encourage registrants to vote for the party's candidates. And, in no case, should the center allow campaign materials to be distributed.

Q. In our state, when persons register to vote they register as members of a political party, e.g., Democratic, Republican, etc. Is that type of voter registration nonpartisan?

Voter registration is nonpartisan if it does not favor one candidate or party over another. For example, it is not advisable to do voter registration only in neighborhoods that are likely to support a candidate or party. A health center with multiple sites, if it conducts or permits voter registration activities on site, should do so at all its sites.

Q. Our center plans to dedicate a staff person to assist patients to register to vote during a month-long voter registration drive. Can we continue to charge her salary to our Section 330 grant?

No. According to HRSA, while health center staff can assist in voter-registration activities, Section 330 funds cannot be used to support those activities. Therefore, the costs of staff time spent on voter registration and the costs of other health center resources spent on voter registration, e.g. security for after-hours registration events should be allocated to the center’s non-grant funds such as program income or other unrestricted funding sources, such as donations, private grants, or contributions. Also keep in mind that staff time and other resources devoted to voter registration cannot detract from the health center’s ability to carry out its health care activities.