STATE ETHICS COMMISSION
STATEMENT OF FINANCIAL INTERESTS

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK IS NOT COMPLETED OR IF SIGNATURE OR DATE IS MISSING.

SIGN THE FORM USING THE CURRENT DATE. DO NOT BACK DATE SIGNATURE.

THOSE INDIVIDUALS WHO HOLD MORE THAN ONE OFFICE AND/OR POSITION MUST FILE A COPY OF THEIR FORM AT EACH FILING LOCATION.

FILERS MAY USE THE ONLINE FILING SYSTEM AT THE STATE ETHICS COMMISSION'S WEBSITE: WWW.ETHICS.PA.GOV. A PAPER COPY MAY STILL BE REQUIRED TO BE SUBMITTED TO YOUR FILING LOCATION. FILERS SHOULD CHECK WITH THEIR FILING LOCATION FOR REQUIREMENTS.

THIS FORM MUST BE COMPLETED AND FILED BY:

A Candidates - Persons seeking elected state, county and local public offices, including first-time candidates, incumbents seeking re-election, and write-in candidates who do not decline nomination/election within 30 days of official certification of same.

B Nominees - Persons nominated for public office subject to confirmation.

C Public Officials - Persons serving as current state/county/local public officials (elected or appointed). The term includes persons serving as alternates/designees. The term excludes members of purely advisory boards.

D Public Employees - Individuals employed by the Commonwealth or a political subdivision who are responsible for taking or recommending official action of a non-ministerial nature with regard to: contracting or procurement; administering or monitoring grants or subsidies; planning or zoning; inspecting, licensing, regulating or auditing any person; or any other activity where the official action has an economic impact of greater than a de minimis nature on the interests of any person. The term does not include individuals whose activities are limited to teaching.

A former public official or former public employee must file the year after termination of service with the governmental body.

E Solicitors - Persons elected or appointed to the office of solicitor for political subdivision(s).

IMPORTANT: Please read all instructions carefully prior to completion of form. Also, review the filing chart (Page 4) for proper filing location. Any questions may be directed to the State Ethics Commission at (717) 783-1610 or Toll Free at 1-800-932-0936.

This Form is required to be filed pursuant to the provisions of the Public Official and Employee Ethics Act, 65 Pa C.S. §1101 et seq.
STATEMENT OF FINANCIAL INTERESTS INSTRUCTIONS

Please print neatly in capital letters. If you require more space than has been provided, please attach an 8 1/2" x 11" piece of paper to the form. Blocks 01 through 06 are for current information.

Block 1 Please fill in your last name, first name, middle initial and suffix (if applicable) in the boxes provided. Public office candidates should use the exact name used on official nomination petition or papers.

Block 2 List an office (business or governmental) or home address and daytime telephone number.

Block 3 Please check the block or blocks to indicate your status. See definitions on page 1. If you are correcting a prior filing, please check the block, designating an amended form.

Block 4 Please check the appropriate block (seeking, hold, held) for each position you list in the blocks below. List all of the public position(s) which you are seeking, currently hold, or have held in the prior calendar year. Please be sure to include job titles and official titles such as "member" or "commissioner" (even if serving as an alternate/designee).

Block 5 Please list all political subdivision(s) agency(ies) as to which you: (1) are presently seeking a public position or public office as a candidate (incumbent or non-incumbent) or nominee; (2) presently hold a public position or public office; and/or (3) previously held a public position or public office during all or any portion of the calendar year shown in block 7. (The term "political subdivision" includes a county, city, borough, incorporated town, township, school district, vocational school, county institution, district, and any authority, entity or body organized by the aforementioned.)

Block 6 Please list your current occupation or profession. This information may have already been stated in block 4.

Block 7 List the calendar year for which you are filing this form. Like tax returns, these forms disclose financial information for a prior calendar year. For example, for the form due May 1, 2017, Block 7 would read "2016." The information in blocks 08 through 15 should represent financial interests for the calendar year listed.

Block 8 REAL ESTATE INTERESTS: This block contains the address of any property which was involved in transactions (leasing, purchasing, or condemnation proceedings of real estate interests) with the Commonwealth or any other governmental body within the Commonwealth. If you have no direct or indirect interests in such a property, then check "NONE."

Block 9 CREDITORS: This block contains the name and address of any creditor and the interest rate of any debt over $5,500 regardless of whether such debt is held solely by you or jointly by you and any other individual, including your spouse, where each obligor is fully responsible for the obligation. A joint obligation with other persons, for which the fier is responsible only for a proportional share that is less than the reporting threshold, is not required to be reported. Do not report a mortgage or equity loan on your home (or secondary home), or loans or credit between you and your spouse, child, parent or sibling. Car loans, credit cards, personal loans and lines of credit must be listed on the form if the balance owed was in excess of $5,500 at any time during the calendar year. If you do not have any reportable creditor, then check "NONE."

Block 10 DIRECT OR INDIRECT SOURCES OF INCOME: List the name and address of each source of $1,300 or more of gross income regardless of whether such income is received solely by you or jointly by you and another individual such as a spouse. "Income" includes any money or thing of value received or to be received as a claim on future services or in recognition of services rendered in the past, whether in the form of a payment, fee, salary, expense, allowance, forbearance, forgiveness, interest, dividend, royalty, rent, capital gain, reward, severance payment, proceeds from the sale of a financial interest in a corporation, professional corporation, partnership or other entity resulting from termination/withdrawal thereof upon assumption of public office or employment or any other form of recompense or combination thereof. The term refers to gross income; it includes prizes winnings and tax-exempt income but does not include gifts, governmental mandated payments or benefits, retirement, pension or annuity payments funded totally by contributions of the public official or employee, or miscellaneous, incidental income of minor dependent children. If you do not have ANY reportable source of income, then check "NONE."

Block 11 GIFTS: For each source of gift(s) valued at $250 or more in the aggregate, list the following information: the name and address of the source; the circumstances, including a description, of each gift; and the value of the gift(s). Do not report political contributions otherwise reportable as required by law, gift(s) from friends or family members (although the term "friend" does not include a registered lobbyist or employee of a registered lobbyist); or any commercially reasonable loan made in the ordinary course of business. If you did not receive any reportable gift, then check "NONE."

Block 12 TRANSPORTATION, LODGING OR HOSPITALITY EXPENSES: List the name and address of each source and the amount of each payment/reimbursement by the source for transportation, lodging or hospitality that you received in connection with your public position if the aggregate amount of such payments/reimbursements by the source exceeds $500 for the calendar year for which you are reporting. Do not report reimbursements made by a governmental body or by an organization/association of public officials/employees of political subdivisions that you serve in an official capacity. If you do not have any reportable expense payments/reimbursements, then check "NONE."

Block 13 OFFICE, DIRECTORSHIP OR EMPLOYMENT IN ANY BUSINESS ENTITY: List both the name and address of the business entity for any office that you hold (for example, President, Vice President, Secretary, Treasurer), any directorship that you hold (through service on a governing board such as a board of directors), and any employment that you have in any capacity whatsoever as to any business entity. This block focuses solely on your status as an officer, director or employee, regardless of income. If you do not have any office, directorship or employment in any business entity to report, then check "NONE."

Block 14 FINANCIAL INTERESTS: List the name and address and interest held in any business for profit of which you own more than 5% of the equity or more than 5% of the assets of economic interest in indebtedness. If you do not have any such financial interest to report, then check "NONE."

Block 15 TRANSFERRED BUSINESS INTERESTS: List the name and address of any business as to which you transferred a financial interest (as defined in Item 14) to a member of your immediate family (parent, spouse, child, brother or sister), as well as the interest held, relationship to the individual, and date of transfer. If you did not transfer any such business interest, then check "NONE."

Please sign the form and enter the current date. Do not back date your signature.
STATEMENT OF FINANCIAL INTERESTS
PLEASE PRINT NEATLY

01 LAST NAME: [Redacted]
FIRST NAME: [Redacted]

02 ADDRESS: Office (business or governmental) or home: [Redacted]
City: [Redacted]
State: [Redacted]
Zip Code: [Redacted]
Area Code: [Redacted]
Phone: [Redacted]

NOTE: IF YOU ARE INCLUDING ATTACHMENTS, DO NOT INCLUDE ANYTHING THAT BEARS YOUR SOCIAL SECURITY NUMBER OR FINANCIAL ACCOUNT NUMBERS.

03 STATUS: Check applicable block or blocks, more than one block may be marked. (See instructions on page 2)
A  Candidate (including write-in)  C  Public Official (Current)  D  Public Employee (Current)  E  Check this block if you are filing as a solicitor
B  Nominee  C  Public Official (Former)  D  Public Employee (Former)

04 PUBLIC POSITION OR PUBLIC OFFICE (administrator, member, Commissioner, job title, etc.)
A  [Redacted]  B  [Redacted]

05 GOVERNMENTAL ENTITY in which you are/were an Official, Employee, Candidate or Nominee (e.g., dept., agency, authority, borough, board, commission, court, school district, hwp, etc.)
A  [Redacted]  B  [Redacted]

06 OCCUPATION OR PROFESSION (This may be the same as block 4)

07 YEAR SEE INSTRUCTIONS. Information in Blocks 8-15 represents disclosure for the calendar year listed here: 20

08 REAL ESTATE INTERESTS (See instructions on page 2) IF NONE, check this box. □

09 CREDITORS (See instructions on page 2). Creditor (Name and Address) IF NONE, check this box. □
Name: [Redacted]
Address: [Redacted]

10 DIRECT OR INDIRECT SOURCES OF INCOME including (but not limited to) all employment. (See instructions on pg. 2) ONLY IF NONE, check this block. □
Name: [Redacted]
Address: [Redacted]

11 GIFTS (See instructions on page 2) IF NONE, check this box. □
Source of Gift: [Redacted]
Address of Source of Gift: [Redacted]
Value of Gift: [Redacted]
Circumstances (including description) of Gift: [Redacted]

12 TRANSPORTATION, LODGING, HOSPITALITY (See instructions on page 2) IF NONE, check this box. □
Source (Name and Address): [Redacted]

13 OFFICE, DIRECTORSHIP, OR EMPLOYMENT IN ANY BUSINESS (See instructions on page 2) IF NONE, check this box. □
Business Entity (Name and Address): [Redacted]
Name: [Redacted]
Address: [Redacted]

14 FINANCIAL INTEREST IN ANY LEGAL ENTITY IN BUSINESS FOR PROFIT (See instructions on page 2) IF NONE, check this box. □
Name and Address of Business: [Redacted]
Name: [Redacted]
Address: [Redacted]

15 BUSINESS INTERESTS TRANSFERRED TO IMMEDIATE FAMILY MEMBER (See instructions on page 2) IF NONE, check this box. □
Business (Name and Address): [Redacted]
Transferor (Name and Address): [Redacted]
Transferee (Name and Address): [Redacted]
Interest Held: [Redacted]
Relationship: [Redacted]
Date Transferred: [Redacted]

The undersigned hereby affirms that the foregoing information is true and correct to the best of said person's knowledge, information and belief; said affirmation being made subject to the penalties prescribed by 15 Pa.C.S. 14904 (unsworn falsification to authorities) and the Public Official and Employee Ethics Act, 65 Pa.C.S. §1108(b).

Signature: [Redacted]
Enter Current Date: [Redacted]

THIS FORM IS CONSIDERED DEFICIENT IF ANY BLOCK ABOVE IS NOT COMPLETED. MAKE A COPY FOR YOUR RECORDS.
# Who Must File, Where to File, and When to File

<table>
<thead>
<tr>
<th>WHO MUST FILE</th>
<th>ORIGINAL COPY</th>
<th>ADDITIONAL FILINGS*</th>
<th>WHEN TO FILE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. STATUS BLOCK A - CANDIDATES</strong></td>
<td></td>
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<tr>
<td>Statewide</td>
<td>State Ethics Commission</td>
<td>Append to nomination petition when filed with the State Bureau of Elections 210 North Office Building Harrisburg, PA 17120-0028</td>
<td><strong>ON OR BEFORE THE LAST DAY FOR FILING A PETITION TO APPEAR ON THE BALLOT FOR ELECTION</strong></td>
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<tr>
<td>State Senate</td>
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<td>State House</td>
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<td>Supreme Court</td>
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<td>Superior Court</td>
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<td>Common Pleas Court</td>
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<td>Traffic Court</td>
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<td>Municipal Court</td>
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<tr>
<td>Commonwealth Court</td>
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<tr>
<td>Constables / Deputy Constables</td>
<td>State Ethics Commission</td>
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<td>Countywide</td>
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<td>Township</td>
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<tr>
<td>Municipality (home rule charter)</td>
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<tr>
<td>Magisterial District Judges</td>
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<tr>
<td>File with the County in which the Magisterial District is located</td>
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<tr>
<td>School Director</td>
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<tr>
<td>File in the School District where you are a candidate</td>
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<tr>
<td>Announced Write-in</td>
<td></td>
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</tr>
<tr>
<td>Unannounced Write-in Winners of Nominations</td>
<td>For state office file with State Ethics Commission. For county or local office file with governing authority of political subdivision.</td>
<td>No additional copy required</td>
<td>Within 30 days of official certification of having been nominated or elected unless such person declines the nomination or office within that time frame.</td>
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<tr>
<td>Unannounced Write-in Winners of Elections</td>
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</tbody>
</table>

| **B. STATUS BLOCK B - NOMINEE** | | | 10 days before official or body approves or rejects the nomination. |
| State Level | State Ethics Commission | File with the Official or Body vested with the power of confirmation | |
| County/Local Level | Governing authority of political subdivision | | |

| **C. STATUS BLOCK C - PUBLIC OFFICIAL** | | | |
| Commonwealth Public Officials such as: Heads of executive, legislative and independent agencies; boards and commissions; and persons appointed to positions designated as offices. | State Ethics Commission | File with each Agency, Board, Commission, Department, or Government Body in which employed or to which appointed. (make additional copies if needed) | |
| State House Member | | | |
| State Senate Member | | | |
| Local Public Officials serving in: | | | |
| Counties; Boroughs; Townships; Home Rule Municipalities; Municipal Authorities; School Districts | | | |
| Incumbent Judges and Magisterial District Judges who are not candidates file a Statement of Financial Interests for Judicial Officers with the Administrative Office of Pennsylvania Courts (AOPC). | | | |
| Constables / Deputy Constables | State Ethics Commission | | |

| **D. STATUS BLOCK D - PUBLIC EMPLOYEE** | | | |
| Commonwealth PUBLIC EMPLOYEE (Executive, Leg. & Independent Agencies) | File only with your Employer | Additional copy is not required to be filed (unless serving in multiple capacities, then file with each entity as required) | |
| County | | | |
| City | | | |
| Borough | | | |
| Township | | | |
| Municipal (home rule) | | | |
| Municipal Authority | | | |
| School District | | | |

| **E. STATUS BLOCK E - SOLICITOR** | | | |
| File with the governing authority of each political subdivision for which you are Solicitor | Additional copy is not required to be filed (unless serving in multiple capacities, then file with each entity as required) | |

* FILER IS RESPONSIBLE FOR MAKING ANY ADDITIONAL COPIES.
STATEMENT OF FINANCIAL INTERESTS FORM
(CALENDAR YEAR 2016)

Item 03: You are considered a public employee.

Item 04: ☐ For current employees – check the boxes labeled “Hold” and “Held” and list the position(s) held in 2016. For former employees – check the box labeled “Held” and list the position held in 2016.

Item 05: Insert PASSHE and Shippensburg University.

Item 06: May be the same as #04.

Item 07: Insert 2016.

Item 13-15: If no other information is provided, the “IF NONE” box should be checked.

IMPORTANT!

The completed and signed financial disclosure form for CY2016 is due to the Human Resources Department by: Friday, March 31st, 2017
ATTN: Robyn Lovett, Old Main 109.

PLEASE MAKE A COPY FOR YOUR FILES IF YOU DESIRE.
This directive establishes policy, responsibilities, and procedures for filing Statements of Financial Interests (SFIs) by public officials and public employees as required by the Public Official and Employee Ethics Act, 65 Pa. C.S. §§ 1101-1113 ("Ethics Act"). Marginal dots are excluded due to major changes.

1. PURPOSE. To establish policy, responsibilities, and procedures for implementing the financial disclosure requirements of the Ethics Act.

2. SCOPE. This directive applies to all employees of departments, boards, commissions, and councils (hereinafter referred to as "agencies") under the Governor's jurisdiction who meet the definition of public official or public employee.

3. OBJECTIVES.

   a. To provide a uniform system of identifying and assisting public officials and public employees who are required to file SFIs as required by the Ethics Act.

   b. To provide a uniform system of filing, maintaining, accessing, and releasing SFIs.

   c. To provide an appeal process for employees who believe they do not meet the definition of a public official or a public employee as set forth in the Ethics Act and regulations promulgated by the State Ethics Commission (SEC).
4. DEFINITIONS.

a. Administering or Monitoring Grants. Directing, supervising, or approving the expenditure or reimbursement of grant funds or monitoring another person's or organization's administration of grants or funds. Administering or monitoring does not include compiling expenditures, comparing actual to planned expenditures or reimbursements, preparing comparative reports, or completing grant proposals or reimbursement forms under specific direction.

b. Contracting or Procurement. Awarding a contract or making a decision to purchase by the preparation of requests for bids and proposals, the solicitation and evaluation of proposals, or the selection of a vendor.

c. Economic Impact of Greater than a De Minimis Nature. An economic consequence which has a significant effect.

d. Inspecting, Licensing, Regulating, or Auditing any Person. These criteria do not include activities which are exclusively internal in nature such as auditing the internal processes of an organization. Clerical and procedural activities in issuing permits and licenses are not included.

e. Ministerial Action. An action that a person performs in a prescribed manner in obedience to the mandate of legal authority, without regard to or the exercise of the person's own judgment as to the desirability of the action being taken.

f. Nonministerial Action. An action in which a person exercises his or her own judgment as to the desirability of the action being taken.

g. Planning or Zoning. An action which is directed by a planning commission, zoning board, department, agency, or governmental body which involves the regulation of real property.

h. Public Employee. Any individual employed by the commonwealth who is responsible for taking or recommending official action of a nonministerial nature with regard to:

(1) contracting or procurement;

(2) administering or monitoring grants or subsidies;

(3) planning or zoning;

(4) inspecting, licensing, regulating, or auditing any person; or,

(5) any other activity where the official action has an economic impact of greater than a de minimis nature on the interests of any person.
Public Employees are those whose work is in the functional areas specified above. The regulations of SEC set forth the following criteria in (a) and (b) below, to be used in part to determine status as a public employee:

(a) A person who normally performs responsibilities in the field without on-site supervision; or,
   - is the immediate supervisor of such a person; or,
   - is the supervisor of the highest level field office.

(b) A person with the authority to make final decisions; or,
   - with the authority to forward or stop recommendations from being sent to the person or body with the authority to make final decisions; or,
   - who prepares or supervises the preparation of final recommendations; or,
   - who makes the final technical recommendations; or,
   - whose recommendations or actions are an inherent and recurring part of his or her position or affect organizations other than his or her own.

Examples of Public Employees Include: Bureau Directors, Division Chiefs or heads of equivalent organizational elements, purchasing agents, housing and building inspectors, appraisers, staff attorneys, and grant and contract managers.

Examples of Classes not Covered by Financial Disclosure Requirements Include Anyone:

- who is involved exclusively in ministerial activity (as clerical staff, maintenance workers, construction workers, equipment operators, security guards, probation officers); or,
- who is in a position officially designated as a trainee position; or,
- who is employed by the state in teaching, as distinguished from administrative duties, unless performing functions which fall under the criteria above.

i. Public Official. Positions which are specifically included are:

(1) Governor and Lieutenant Governor.

(2) All heads of executive, legislative, and independent agencies, boards, and commissions.
(3) All Deputy Secretaries.

(4) All Executive Directors.

(5) All Deputy Commissioners.

(6) All members, including persons serving as designees or alternate members, of boards, councils, and commissions under the Governor’s jurisdiction, except those serving on advisory boards having no authority to expend public funds (other than reimbursement for personal expenses) or otherwise exercise the power of the state.

5. POLICY. Those meeting the definition of public official or public employee, as set forth in Section 4.h. and Section 4.i. of this directive, are required to complete and file SFIs every year no later than May 1. The financial information to be disclosed is for the preceding calendar year. The form must be filed by May 1 each year the position is held and the year after leaving a position required to file financial statements. Persons serving in multiple public positions must satisfy the filing requirements for all such positions.

6. RESPONSIBILITIES.

a. Office of Administration (OA) shall:

(1) Identify and notify public officials and public employees through the online filing website of their requirement to file a SFI under the Ethics Act.

(2) Make the SFI form available for use in the event that a public official or public employee cannot file electronically.

(3) As new classifications are developed, make a determination as to the applicability of the Ethics Act to those classes.

b. Agency Heads shall ensure that the policy and procedures for financial disclosure are implemented in accordance with this directive.

c. Agency Human Resources Directors shall:

(1) Generate a list of jobs which meet the definition of public official or public employee, as set forth in Section 4.h. and Section 4.i. of this directive, with a financial disclosure code.

(2) Determine, based on the guidelines and definitions of a public official and public employee, any other jobs or individual positions which meet the criteria. New hires are to be notified during the orientation process of the requirement to file each year the position is held and the year after leaving a position that is required to file SFIs.
(3) Assist OA, Office for Human Resources Management, Human Resources Service Center (HRSC) in providing public officials and public employees with SFI forms, due dates, filing procedures, and the appeal process for public officials and public employees that do not have access to a commonwealth computer. Public officials and public employees with access to a commonwealth computer will be notified automatically through the online filing website and referred to the website at https://www.fd.state.pa.us.

(4) Establish a single central file of all paper SFIs. Paper SFIs shall not be included in Official Personnel Folders. These paper SFIs shall be uploaded into the online filing website.

(5) Provide necessary job information and testimony, as required, at appeal hearings or at other judicial hearings.

(6) Review submitted SFIs for conflicts of interest and ensure agency investigation when there is a possible conflict of interest.

f. **Agency Chief Counsels** shall review SFIs for any conflicts of interest and ensure agency investigation when there is a possible conflict of interest.

g. **Office of General Counsel** shall:

   (1) Review SFIs of any public officials and public employees when agencies have identified possible conflicts of interest.

   (2) Review SFIs for Chief Counsel for any conflict of interest.

h. **Those meeting the definition of public official or public employee**, shall complete and file SFIs each year the position is held and the year after leaving a position required to file SFIs. Public officials and public employees who are appointed, promoted, or transferred into designated classes or who permanently assume duties which fall under the definition of public official or public employee on or before May 1 will be required to complete and file SFIs on or before May 1. The forms are to be completed through the online filing website unless the public official or public employee does not have access to a commonwealth computer. The forms require the disclosure of financial information for the prior calendar year.

i. **Persons serving in multiple public positions** must satisfy the filing requirements for all such positions held. Commonwealth employees who are both "public officials" and "public employees" subject to the Ethics Act, for example, by serving as designees or alternate members of boards, councils, commissions or the like, must satisfy the filing requirements for their employment positions and their public offices. All applicable filing requirements may be satisfied by listing all such positions when completing SFIs, filing the original form at one required filing location and filing copies at all other required filing locations.
7. PROCEDURES.

a. Filing of SFIs.

(1) The HRSC will coordinate the notification regarding and submission of SFIs for all current and former public officials and public employees. This will be done automatically through the online filing website for current public officials and public employees with commonwealth computer access. Current and former public officials and public employees who do not have commonwealth computer access will be formally notified, in writing, of the requirement to file SFIs. The notification must include the due date and it must advise public officials and public employees of the availability of the appeal procedure.

(2) Each agency must conduct, as necessary, a class-by-class analysis as well as a position-by-position analysis to determine applicability of the guidelines and the definitions of public official and public employee.

(3) Questionable classes or positions (either for addition or deletion) and supporting data are to be submitted to the Deputy Secretary for Human Resources Management.

(4) When paper SFIs are completed, they are to be filed in the following manner:

(a) Public Official. Original to the agency Human Resources Office where an electronic copy will be uploaded to the filing website and electronically routed to SEC. The original will be filed in a central agency file and maintained in accordance with the current retention procedure.

(b) Public Employee. Original to the agency Human Resources Office where an electronic copy will be uploaded to the filing website. The original will be filed in a central agency file and maintained in accordance with the current retention procedure.

(5) Failure to File.

(a) If no SFI is received by May 1, or a SFI was received but is considered deficient, and no appeal is received, agency Human Resources Directors are to advise current public officials and public employees of their non-compliance and provide a 10 workday due date for either submission of the SFIs or the formal appeal form. An additional email reminder will also be sent through the online filing website for those public officials and public employees with access to a commonwealth computer.
(b) By June 1 (or the first scheduled workday following) of each year, agency Human Resources Offices shall review the data provided by the HRSC indicating which public officials and public employees of their respective agencies have not filed SFIs and inform the HRSC of any errors in the data and of any public officials or public employees who are deceased, on extended military leave, or who have filed an appeal that is under review.

(c) The HRSC shall formally notify public officials and public employees of their non-compliance and of the requirement to submit a SFI or an appeal form within 10 days of the notification.

(d) If a completed SFI or an appeal form has not been submitted within 10 days after the notification from the HRSC, the Deputy Secretary for Human Resources shall formally notify public officials and public employees of their failure to comply.

(e) OA will formally present a list of public officials and public employees failing to file or filing deficient SFIs to SEC for official action.

(f) If SEC determines that filing is required, SEC will notify the public official or public employee of this requirement. In the event the public official or public employee still refuses to file, SEC may initiate appropriate proceedings. The commonwealth may also initiate progressive discipline if the public official or public employee fails to comply.

(6) Individuals who have already completed and filed a SFI with another state agency or political subdivision (such as someone who filed as a Township Commissioner) are not required to complete a second SFI as long as the previously completed form includes all the required information as to each such position or status. The multiple filing requirements may be satisfied by submitting a copy of the completed form at each filing location, including the current agency, in accordance with this directive.


(1) In the event a public official or public employee contests coverage by the Ethics Act, an appeal may be submitted. If any member of a board, commission, etc., files an appeal, the decision shall be applied to all members of that board, commission, etc.

(2) Completed appeal forms must be submitted to the agency Human Resources Office if a public employee, or to the Secretary of Administration if a public official.

(3) Agency representatives and OA will review each appeal and render a determination. The public employee will receive a formal notice of the determination through the agency Human Resources Office. The public official will receive a formal notice from the Secretary of Administration.
(4) If the public official or public employee is not satisfied with the appeal determination, a formal appeal may be submitted directly to SEC, with a copy submitted to the agency Human Resources Office if a public employee, or to the Secretary of Administration if a public official, in accordance with the rules and regulations of SEC. A final determination will be rendered by SEC and the public official or public employee will be notified of the determination in writing.

(5) If the appeal is denied by SEC, the agency Human Resources Office is to ensure that the public official or public employee files a SFI within 30 days of receipt of that decision. This must be done through the online filing website https://www.fd.state.pa.us if the employee has access to a commonwealth computer.

(6) If a public official or public employee fails to submit a SFI, OA, Deputy Secretary for Human Resources Management should be notified for appropriate action.


(1) SFIs submitted by public officials are maintained by SEC and are available for public access and copying in Room 309 of the Finance Building. Such forms are also available online at SEC website (http://www.ethics.state.pa.us) in SEC's e-Library.

(2) Agency Human Resources Directors shall establish a central file of all paper statements submitted under the Ethics Act. They shall not be included in Official Personnel Folders. These statements must also be uploaded into the online filing website.

(3) Either the agency Human Resources Director or a supervisor in the agency Human Resources Office at Division Chief level shall ensure the completed SFIs are retained in a confidential file.

(4) SFIs may be released in response to any requests, including requests made pursuant to the Right-to-Know Law (RTKL), 65 P.S. §§ 67.101, et seq., only after the agency notifies and coordinates with OA, Office of Enterprise Records Management.

(5) SFIs shall be provided, upon request, to the Governor, the Lieutenant Governor, the Secretary of Administration, the General Counsel, and the Inspector General.

(6) SFIs shall be maintained in accordance with Manual 210.9, The Commonwealth of Pennsylvania General Records Retention and Disposition Schedule.

This directive replaces, in its entirety, Management Directive 205.10, dated January 4, 2011.