

2022 Statement of Financial Interests – PASSHE Instructions

As a current or former employee of the Pennsylvania State System of Higher Education, you have been identified as an individual who meets the definition of public employee under the [Public Official and Employee Ethics Act](#), 65 Pa.C.S. §§ 1101–1113. Employees who are covered by the Public Official and Employee Ethics Act must comply with a number of duties and obligations. Employees should avoid any conflict of interest, which means the use of their office or information gained through their official duties for the personal pecuniary gain of themselves, members of their immediate family, businesses (including non-profit entities) with which they have an interest, or third parties.¹ In addition, the Act requires the completion of a *Statement of Financial Interests* form for each calendar year in which you serve as a public employee and the year following termination of service.

The purpose of this memorandum is to request your cooperation in completing the attached *Statement of Financial Interests* for the calendar year 2022. If you believe that you do not meet the definition of public employee, please contact me as soon as possible to discuss the matter.

Please read all instructions carefully before completing the form. The following is clarification on select items that have historically caused confusion.

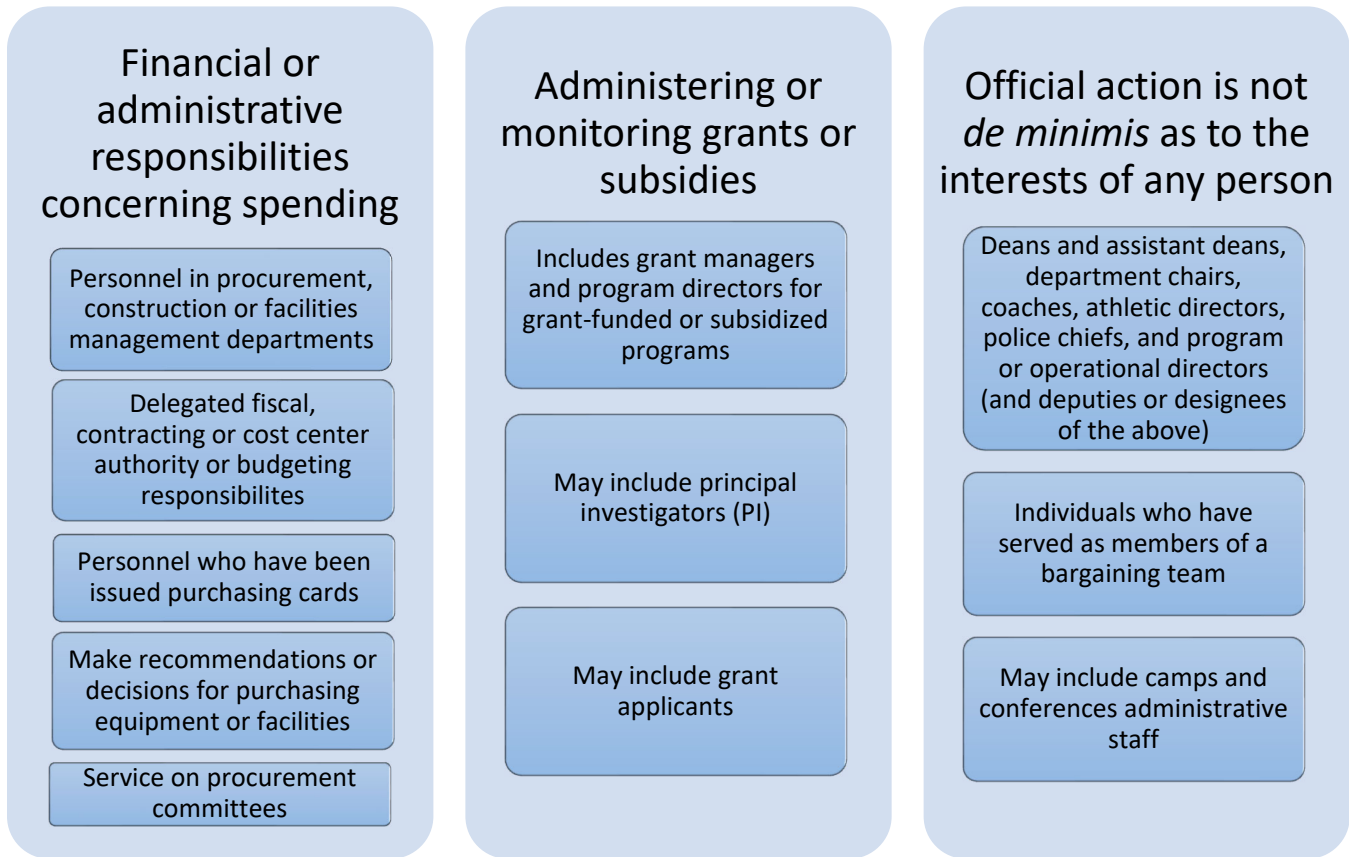
- Item 02** • You may list either your home or business office address. Please note these forms are available for public inspection and you may want to consider listing your university business address.
- Item 03** • The following individuals are included in the definition of public employees:
 - Senior Policy Executives
 - “Public employees” include individuals who: have contracting or procurement responsibilities; are responsible for administering or monitoring grants or subsidies; and/or who take official action where the economic impact on the interests of any person is greater than a *de minimis* nature.
- Item 04** • For current employees – check the box labeled “Hold” and list the position(s) held in 2022.
 - For former employees – check the box labeled “Held” and list the position(s) held in 2022.
- Item 05** • The attached form has been prepopulated with the Pennsylvania State System.
- Item 07** • This field has been prepopulated with the year 2022. Please note that all other interests reported should relate to the 2022 calendar year.
- Item 08** • Applies only to real estate transactions with the Commonwealth of Pennsylvania or a governmental body within the Commonwealth of Pennsylvania.
- Items 09–15** • If no information is provided in a section, remember to check “If NONE, check this box”.
- Item 09** • No dollar amounts owed are required to be listed, only the name and address and interest rate for covered debts where the amount owed exceeded \$6,500 at any point in the 2022 calendar year. You may include an attachment, if necessary. Please note these forms are subject to public inspection. Any information provided may be reviewed by parties outside the State System. Please do not include financial statements or other confidential materials as attachments.
- Item 10** • The State System has been prepopulated in this field as a source of income. Report all other sources of (gross) income of \$1,300 or more as an attachment.
- Item 11** • Report all covered gifts valued at \$250 or more in the aggregate.
- Item 12** • List reimbursements that exceeded \$650 per event for actual expenses incurred during official business for transportation, lodging, or hospitality that were **reimbursed by an outside entity** (such as a foundation, philanthropic group or professional organization). The reporting requirement **does not** include reimbursement by a government body or by an organization of public officials that you serve in an official capacity.
- Item 13** • List all officer and directorships and employment you may hold with any business entity, regardless of whether you receive income.
 - Business entities **include non-profit entities** such as religious organizations, community organizations and civic organizations.

Form is due **by April 14, 2023**. Keep a copy and the instructions for your files. If you have any questions regarding what needs to be included on the *Statement of Financial Interests* form, please contact

Please note the State Ethics Commission website allows for electronic filing of forms. Any online filing submitted on the State Ethics Commission website by a Pennsylvania State System employee **is not transmitted to the Pennsylvania State System**. If you file online, you will still need to submit either a signed copy of the electronically-filed form or an original copy of the attached form.

¹It is also important to note that employees are also strictly prohibited from holding an interest, office or employment with any entity which contracts with the agency where they are employed, State Adverse Interest Law, 71 P.S. §776.1 *et seq.*

WHO IS CONSIDERED A PUBLIC EMPLOYEE UNDER THE PUBLIC OFFICIAL AND EMPLOYEE ETHICS ACT?



Factors to consider in each of the functional areas

- Whether the individual has the authority to make final decisions
- Whether the individual has the responsibility/authority to forward or stop recommendations made to the person who makes the final decision
- Whether the individual prepares or supervises the preparation of final recommendations
- Whether the individual makes final technical recommendations
- Whether the individual makes recommendations or takes action on a recurring basis as part of the inherent responsibilities of the position that affect organizations other than his/her own

Excluded individuals

- Individuals who are only involved in any of the above functional areas in an exclusively ministerial capacity (clerical staff, maintenance workers, equipment operators, police officers, etc.)
- Faculty who do not have any administrative duties or other responsibilities described above

NOTE: FORMER PUBLIC EMPLOYEES AND PUBLIC OFFICIALS MUST FILE FOR THE CALENDAR YEAR FOLLOWING SERVICE