

MEMORANDUM

**TO:** Public Employees and Former Public Employees

**FROM:** Human Resources

**DATE:** March 3, 2025

**RE:** 2024 Calendar Year Financial Disclosures  
Required by the *Public Official and Employee Ethics Act*

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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 (“Ethics Act”). Employees who are covered by the Ethics Act must comply with a number of duties and obligations. Employees should avoid any conflict of interest, which means the use of their position or information gained through their official duties for the personal pecuniary gain of themselves, members of their immediate family, or businesses (including non-profit entities) with which they or members of their immediate family have an interest.<sup>1</sup> In addition, the Ethics 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 2024*. 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 2024.
  - For former employees – check the box labeled “Held” and list the position(s) held in 2024.

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<sup>1</sup>It 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.*

- Item 05** • The attached form has been prepopulated with the Pennsylvania State System.
- Item 07** • This field has been prepopulated with the year 2024. Please note that all other interests reported should relate to the 2024 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 2024 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.  
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- Item 12** • List the name, source and the amount of any payments or reimbursements that exceeded \$650 in the aggregate for actual expenses incurred during official business for transportation, lodging, or hospitality that were paid or **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.

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 complete the version sent to you via DocuSign. The form you file on the State Ethics Commission website is searchable by the public.