



Commonwealth of Pennsylvania

Statements of Financial Interest: Quick Tips for Reviewers

Updated January 2025

The State Ethics Commission provided the following guidelines that it uses to audit Statements of Financial Interest, including some of the most common errors and questions on forms. Complete instructions can be found on the official (Ethics) Statement of Financial Interests form.

Form Tips:

- Blocks 1-6 are for current information – this means information that applies at the time the form is completed.
- Blocks 7-15 are information from the prior calendar year.

Verify that blocks 8-15 either have data entered or “None” selected; empty responses in any block will result in the form being sent back. If any other data elements are missing, the form will be sent back as deficient.

NOTE: Forms should not be returned for disclosing more information than is requested. It is always better to overstate than to understate information. If the correct information is given, the form should be accepted.

Block 2: A work address is strongly encouraged, but either a home or work address should be accepted. Most current employees/officials list their work address because these are public documents. Former employees/officials generally list their home address. If an address is listed, we trust that it is accurate and do not validate each one. Additionally, a work phone number should be included.

Block 3: Forms would not be returned for having more than one box checked or if the wrong box was checked, if this is the only incorrect item on the form. If other errors are found on the form, the filer would be asked to correct this item as well.

Block 4: If a former employee, this should be **all positions held** in the filing year and the “held” checkbox should be checked. If a current employee, this should be the employee’s current position marked “hold” and any previous positions marked “held” in the filing year.

This can never be “retired” or “separated” as that is not an official position. Individuals who are currently retired or separated should list that status in block 6. Forms would not be returned if an employee marks one or more of these boxes incorrectly and it is the only incorrect item. If other errors are found on the form, the filer would be asked to correct this item as well.

Block 5: Employees should list the agencies where they hold/held the positions listed in block 4 above.

Block 6: A current profession should be listed, or the employee can list “retired” or “separated”. This could be the same entry as block 4, or their profession could be something completely different.

Block 7: Verify that the prior calendar year is listed.

Block 8: The State Ethics Commission only requires that real estate interests be disclosed if the transaction involves the commonwealth or any other governmental body within the commonwealth. However, the Code of Conduct form requires disclosure of all real estate property interests. This means that not all real estate interests will populate to both forms.

Block 9: A partial address for a creditor would not cause a form to be returned. However, missing interest rate information requires that the form is returned to the filer.

Block 10: Any and all sources of income \$1,300 or more for the calendar year, must be included. The Commonwealth agency should also be listed.

For example, reviewers cannot assume that income documented in block 10 results from either (a) financial interests that need to be listed in block 14, or (b) office, directorship or employment that need to be listed in block 13.

On the reverse of that example, if someone documents an entity in blocks 13 or 14, the reviewer cannot assume that it must also be listed in block 10 unless it meets the greater than \$1,300 threshold.

- In relation to stocks – filers can list the group that handles the stocks; they do not have to list each and every stock held. The exception is if they hold more than a 5% interest in the company; this requires that the information be listed in block 14.
- In relation to rental properties – the address of the properties is acceptable as tenants could change.
- **Employees must list the agency(s) where they were employed in the filing period if they earned \$1,300 or more of gross income during the filing period (calendar year).**

All forms must be signed and dated. The State Ethics Commission verifies that forms are not backdated. The Statement of Financial Interests Form is changed slightly each year and previous forms are no longer available. The revision date is printed at the top of the form.

Include your contact information when returning forms to employees. Returned forms are sent to employees via OA, Financial Disclosure. We do inform employees the message is sent from an unmonitored account and ask they not reply to the message but have found employees have been replying because no contact information is provided. Be specific with a name and phone number and/or email if they have further questions.

Questions?

If you have any questions regarding these guidelines, please call Kim Pham at 717.425.7374.