



Commonwealth of Pennsylvania

Statements of Financial Interest: Quick Tips for Reviewers

Updated May 2025

The State Ethics Commission recently 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 Statement of Financial Interests forms.

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. There is no penalty for over disclosure. If the correct information is given, the form should be accepted.

Block 2: The Commission recommends a work address be listed because these are public documents. However, either a home or work address is acceptable for current or former employees/officials. If an address is listed, we trust that it is accurate and do not validate each one. Additionally, a work or personal phone number should be included.

Block 3: Forms generally 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 could 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 may 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.

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 investments:
 - If the filer has a mutual fund or other financial plan (and the income equals or exceeds \$1,300 threshold for the calendar year), and the filer has no authority to buy or sell particular assets in the fund, they may list the fund or plan as a single source.
 - If the filer has an investment portfolio with a broker, other than a mutual fund (and the income equals or exceeds \$1,300 threshold for the calendar year), the filer must list individually the income from each asset if the asset may be bought and sold by the filer.
 - If the filer holds more than a 5% interest in a business they must list the business in block 14.
- In relation to rental properties, you must list the name of any source of income (such as tenant names) for each rental property from which you received income that equals or exceeds \$1,300 or, if you own rental properties through a business, you may list the name of the business as the source of income.
- **Employees must list the agency(s) where they were employed in the filing period if they earned \$1,300.00 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.

Questions?

If you have any questions regarding these guidelines, please call the State Ethics Commission at 717-783-1610 or toll-free at 800-932-0936.