

Guidelines for **UNIVERSITY EMPLOYEES**
who are required to file a
STATEMENT OF ECONOMIC INTERESTS (SEI)
with the **ALABAMA ETHICS COMMISSION**



DISCLOSURES

- The information in this presentation is general information – not legal advice – to help University employees comply with the Alabama State Ethics Act's requirements to file a Statement of Economic Interests (SEI).
- At all times, this advice is secondary to the Ethics Commission's instructions and opinions, and the words of the statute. Those may be found at:
<http://ethics.alabama.gov/forms-ecint2.aspx>



ALABAMA ETHICS LAW

- Applies to public officials and public employees
- Employees of the UA System, UA, UAB, and UAH are public employees.
- Public employees must generally:
 - Avoid conflicts of interest
 - Not use public property for private gain
 - Otherwise comply with the Alabama Ethics Law
- The full text of the law may be found at <http://ethics.alabama.gov/docs/RestatedEthicsActDraft7-28-14.pdf>.



SEI FILING REQUIREMENTS

- Each public employee who earns **over \$75,000 per year** must file a Statement of Economic Interests (SEI) **by April 30th** for the preceding calendar year
- Public employees who are in certain positions must file the SEI form regardless of income.
 - Some of these positions include:
 - ✓ Chief administrators
 - ✓ Public employees who invest public funds
 - ✓ Purchasing or procurement agents
 - ✓ Chief financial and accounting directors
 - ✓ Public employees serving as a supervisor



REQUIREMENTS AND PENALTIES

- University employees who meet these requirements are **required by law** to file SEI forms with the Ethics Commission **annually**.
- The responsibility to do so falls on the individual and not the institution.
- There are **penalties** for failures to comply.
- Intentional failure to file can result in **finances and/or a criminal conviction**.
- Unintentional neglect must be promptly corrected.



ACTIONABLE CONSEQUENCES

- Although the duty of filing an SEI is a personal one, employers can take action against an employee for failing to comply with the law.
- Our Board has clear expectations regarding ethical behavior:
 - [Board Rule 106](#)
 - [Board Rule 106.2](#)
- *Note: If you are required to file a UAS Conflict of Interest form, that is in addition to the SEI form.*



PUBLIC ACCOUNTABILITY

- As public employees, we must strive to comply with both the letter and the spirit of the Ethics Act.
- Our SEI forms can be viewed by the public and media.
- If we fail to accurately complete an SEI, that fact may be readily obvious from other public documents:
 - Probate filings for corporations or businesses
 - Sunshine Act disclosures (Physicians payment disclosures, etc.)
 - Other documents that show outside income



If you received an SEI form or instructions from the UA System or your campus, your name has been submitted to the Ethics Commission as being required to file for the previous year.



The following slides summarize the requirements of the SEI. If you have questions, please first consult the Ethics Commission's instructions for the SEI.



SEI SECTIONS 1 AND 2: GENERAL INFORMATION

- These sections ask you to provide general information, such as:
 - Name
 - Address
 - Telephone numbers
 - Information about your public employment
 - Information about any public office you may hold in addition to your employment
 - General amount you earned last year in those public positions



SEI SECTION 3: OTHER OCCUPATIONS OR BUSINESSES

- In this section, you are asked to list any occupations or businesses that either **you or your spouse** were involved with in the previous year to which **one-third or more** of your working time was spent.
- Requires that you list:
 - Any self-employment
 - Any business in which **you or your spouse** owned **5% or more** of the stock
 - Served as a consultant earning more than \$1,000 for that business
 - Served as an officer, director, or trustee of that business
- Requires, in broad categories, the amount earned last year



SEI SECTION 4: INFORMATION ON FAMILY MEMBERS

- This section requires that you list:
 - Spouse's name, address, occupation or business
 - Name, address, and occupation or business for any dependent children
 - **Only names** of additional family members (living adult children, living parents, siblings, living parents of your spouse)
- Under the Ethics Law, dependents are **not defined by age**. Dependents are those who receive **50% or more of their support** from the public employee or their spouse OR resided with the public employee for **more than 180 days** during the reporting period.



SEI SECTION 5: OTHER INCOME

- The intent of the Ethics Law is to require disclosure of all sources of income regardless of the amount.
- As you will see on the form, bank interest must be listed.
- Use this section to disclose any income or salary on which you spent any time earning, but have not listed thus far.
- List the source, type of income, and the amount in broad categories.



SEI SECTION 5: OTHER INCOME (CONT'D)

- You should also indicate:
 - Whether you earned \$1,000 to \$5,000 or more than \$5,000 serving as an officer, director, trustee, etc., of any entity.

OR

 - Whether you served as an officer, director, consultant, etc., of any entity
- You should also disclose if **you, your spouse, or dependent** owned **more than 5% or more** of the stock of any business, and name the business/businesses.



SEI SECTION 6: REAL ESTATE HOLDINGS

- This section is to be completed only by public officials and not public employees.
- You can skip this section unless you also serve as a public official (i.e. city council, school board, library board, etc.) in addition to your public employment.



SEI SECTION 7: INDEBTEDNESS INFORMATION

- In this section, you should report:
 - All indebtedness for **you, your spouse, and dependents** to all businesses operating in Alabama, as of December 31 of the reporting year
 - Type of business to which debt is owed
 - The number and amount you owe in broad categories
- Include all debt, **except on your homestead**, including student loans.



SEI SECTION 8: PROFESSIONAL OR CONSULTING SERVICES

- **Complete this section if you or your spouse received income for professional or consulting services in the reporting year.**
- The types of businesses are grouped into logical subheadings.
- You should include:
 - Number of clients in each category
 - Gross annual income, or the anticipated annual retainer, for each client



SEI SECTION 9: DECLARATION OF REPORTING PERSON

- In this section, you are asked to declare that the information provided is true and correct and that you understand the information disclosed via the form is public record.
- If filing electronically, you can receive an email confirmation of your submission by providing your email address.



MORE INFORMATION:

- [Alabama Ethics Commission](#)
- [UA System Office of Risk Management](#)
- [UA System Ethics Support](#)
- [UA System Hotline](#)

