

What to know before you go...

City and State ethics laws may apply while you are looking for a job and after you leave City service. You may also need to file an annual financial disclosure statement for up to two years after you leave City service.

JOB SEARCHES

CONFLICTS OF INTEREST

Applying for or accepting a non-City job while you are still working for the City may create a conflict of interest if you can affect the potential new employer's financial interest through official action in your City role.



If you have a conflict, you may still apply for the job, but you must:

- 1 file a letter disclosing the financial interest; and
- 2 disqualify yourself from taking any action to impact the interest.

INTEREST IN CITY CONTRACTS

The City Charter prohibits you from seeking out a paid arrangement that would give you a financial interest in a City contract. For example, you cannot apply for a job that would be funded by a City contract while you are still working for the City. This applies even if you will not be paid until after you leave City service.

FINANCIAL DISCLOSURES



Depending on your position, you may be required to file a statement of financial interests for each year in which you worked for the City, as well as for the calendar year your City service ends. Forms are due May 1st and reflect the previous calendar year.

You can file electronically at financial-disclosure.phila.gov. To ensure continued access, provide a forwarding email address to your HR manager. Contact Board of Ethics staff for more information about your filing obligations or for filing assistance.

EXAMPLE:

You leave City service on February 1, 2023. You must file 2022 disclosures by May 1, 2023, as well as 2023 disclosures by May 1, 2024.

POST-EMPLOYMENT

ONE YEAR

For one year after leaving City service, State law may* prohibit you from being paid to represent someone before your former governmental body – usually the City department or agency where you worked. Representation includes appearances, lobbying, and submitting documents with your name on them.



EXAMPLES:

Grant Applications: You may not be paid to submit a grant application to your former governmental body on behalf of your new employer or another entity.

Meetings: You may not participate in a meeting with your former colleagues on behalf of your new employer.

Independent Contractor: You may not be retained as an independent contractor or subcontractor by your former governmental body.

Identified on Documents: You may not be identified in any documents or contract proposals submitted by your new employer to your former governmental body.

TWO YEAR

For two years after you leave City service, the City's Ethics Code prohibits you from becoming financially interested in any actions you took in your City job.

EXAMPLES:

Grant Funding: If you awarded a City grant to a non-profit, for two years after you leave the City, you may not be paid through that grant.

Non-Profits: For two years after leaving City service, you may not become an employee of a City-related non-profit that you helped establish as part of your City work.

Contract Work: If while working for the City you approved a vendor's contract, for two years after leaving the City you may not be paid by the vendor to work on that contract.

PERMANENT

After you leave the City, the City's Ethics Code prohibits you from assisting another person, whether paid or unpaid, in a transaction involving the City if you participated in the same transaction in your City role.

EXAMPLES:



Lobbying: You may not lobby City officials regarding legislation you worked on for the City, nor may you draft talking points for your new employer to present.

Contract Negotiations: You may not negotiate with the City on behalf of your new employer if you participated in the same negotiations before leaving City service. You may, however, assist your new employer in negotiating a renewal of a contract you worked on for the City (within the limits of the one and two year restrictions).

*The State Ethics Act applies to certain City officers and employees, including most supervisors. The Act's post-employment restrictions do not apply to licensed attorneys engaged in the practice of law. Rule 1.19(c) of the Rules of Professional Conduct, however, prohibits attorneys leaving government service on or after June 1, 2023 from lobbying their former governmental body for one year. The Rules of Professional Conduct are enforced by the Disciplinary Board of the Supreme Court of Pennsylvania.