

**PHILADELPHIA BOARD OF ETHICS**  
**REGULATION NO. 7**  
**REQUIRED ETHICS TRAINING**

**SUBPART A. SCOPE; DEFINITIONS.**

**7.0 Scope.** This Regulation, promulgated by the Board pursuant to its authority under Sections 4-1100 and 8-407 of the Philadelphia Home Rule Charter and Chapter 20-600 of The Philadelphia Code, interprets the requirements of Philadelphia Code Sections 20-606(1)(b)(.1) and (.3) regarding routine and mandatory educational and training programs for City officers and employees.

**7.1 Definitions.** As used herein, the following words and phrases shall have the meanings indicated.

- a. Agency head.** The head of any office, department, board, commission, or other governmental agency of the City authorized to appoint employees.
- b. Board.** Board of Ethics.
- c. Cabinet member.** The Managing Director, the Director of Finance, the City Solicitor, the Chief Public Safety Director, the Director of Planning and Development, the Director of Commerce, the Director of Labor, the City Representative, and such other officers as the Mayor may designate as members of the Mayor's cabinet.
- d. City.** City of Philadelphia.
- e. City board or commission.** Any City board or commission, without regard to the body's title (including a body denoted as a board, commission, council, committee, task force, working group, panel, or other similar designation), established by the City's Home Rule Charter, ordinance, or Executive Order.
- f. City officer or employee.** Any person who is elected or appointed to a position in any branch of the government of the City including:
  - 1. elected City officials;
  - 2. employees of the City, including those serving full-time, part-time, or seasonally, and those on leaves of absence with or without pay;
  - 3. members of City boards and commissions;
  - 4. individuals appointed or assigned to any City position, whether paid or unpaid,

that exercises significant powers of government.

- g. Effective date of employment.** For City employees, the first calendar day of the first pay period they perform work for the City and are on the City's payroll.
- h. Ethics laws.** Chapter 20-600 of the Philadelphia Code, Article X of the Philadelphia Home Rule Charter, and any other matters relating to ethical standards of conduct for City officers and employees later added to the Code or Charter or otherwise assigned to the Board by ordinance.
- i. Term of service.** For appointed or elected City officials, the period beginning on the date the officer's position takes effect by operation of law or action of the appointing authority and ending on the effective date of separation.
- j. Training.** Any program presented or approved by the Board to educate City officers and employees about the City's ethics laws, regardless of whether delivered (1) live by Board staff either in-person or virtually; (2) through pre-recorded presentations or online activities developed by Board staff; or (3) in limited circumstances with the pre-approval of Board staff, through programs presented by departmental training staff or other designees.
- k. Uninterrupted employment or term of service.** The continuous employment or term of service of City officers and employees, whether paid or unpaid, full-time or part-time. Any period of authorized leave (e.g. FMLA; parental leave; union leave) is not considered an interruption of employment or service for the purpose of this regulation.<sup>1</sup>

**7.2 Applicability.** Except where expressly indicated otherwise, the provisions of this Regulation apply to all City officers and employees.

## **SUBPART B. INITIAL TRAINING AND ACKNOWLEDGEMENT.**

**7.3 Initial training.** A City officer or employee, regardless of position, duties, or responsibilities, shall attend initial training within 90 calendar days of the effective date of the officer or employee's employment or the beginning of their term of service.

**7.4 Copy of the City's ethics laws.** An agency head shall provide a copy of the City's ethics laws to each City officer or employee upon the effective date of their employment or the beginning of their term of service. This requirement may be met by providing either an electronic or paper copy of the most current version of the appropriate position-specific ethics manual published by the Board. The most recent versions of the manuals are available for viewing or download at [ethics.pub/manuals](https://ethics.pub/manuals).

**7.5 Acknowledgement.** Within 15 calendar days of the effective date of employment or the beginning of a term of service, each City officer or employee shall acknowledge in writing that the officer or employee has received and reviewed a copy of the City's ethics laws in the form outlined in Paragraph 7.4. The agency head shall maintain a copy of the acknowledgement and

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<sup>1</sup> An interruption in a term of service for a member of a nominating panel occurs when the panel is inactive or not empaneled.

shall make copies of such acknowledgements available for inspection by the Board upon request.

**7.6 Effect of failure to comply.** Failure of a City officer or employee to receive, review, or acknowledge receipt of a copy of the ethics laws, or failure of the agency head to maintain a copy of the acknowledgement, shall have no effect on the duty of the City officer or employee to comply with the ethics laws.

**SUBPART C. ANNUAL AND ROUTINE TRAINING.**

**7.7 Annual training.** The following City officers and employees shall attend training at least once in each calendar year:

- a. Elected City officers;
- b. Cabinet members;
- c. Agency heads;
- d. Members of all City boards and commissions; and
- e. Any other City officer or employee that the Mayor may designate.

An agency head may, at the agency head’s discretion, require additional personnel to attend annual ethics training.

**7.8 Routine training.** In addition to the initial training detailed in Paragraph 7.3, a City officer or employee not required to receive annual training as provided in Paragraph 7.7 shall attend routine ethics training every five (5) years. These City officers and employees shall be divided into five groups for training compliance based on the year in which they started their uninterrupted employment or term of service with the City as follows:

<u>Group</u>	<u>Start years</u>	<u>Routine training due</u>
A	Years ending in 0 and 5	December 31, 2025 and every year thereafter ending in 0 and 5
B	Years ending in 1 and 6	December 31, 2026 and every year thereafter ending in 1 and 6
C	Years ending in 2 and 7	December 31, 2027 and every year thereafter ending in 2 and 7
D	Years ending in 3 and 8	December 31, 2028 and every year thereafter ending in 3 and 8
E	Years ending in 4 and 9	December 31, 2029 and every year thereafter ending in 4 and 9

*Examples for Paragraph 7.8:*

- 1) Employees who started in 2007 must attend their first routine training by December 31, 2027. Their next routine training must be completed no later than December 31, 2032.
- 2) An employee starting in 2023 must attend their first routine training by December 31, 2028. Their next routine training must be completed no later than December 31, 2033.

**7.9 Additional training.** The Board may from time-to-time determine that additional training is required for some or all City officers and employees. In assessing whether additional training is necessary, factors the Board may consider include:

- a. Amendments or additions to the ethics laws, including the degree of substantive change represented by such amendments or additions;
- b. Issuance of significant Board opinions interpreting the ethics laws;
- c. Other significant events or legal developments that may indicate that additional training is appropriate;
- d. The availability, feasibility, and cost of methods of delivering training, such as online training platforms;
- e. Trends in advice, compliance, or enforcement matters that may indicate additional training is needed; and
- f. The departmental assignment or responsibilities of City officers or employees.

**SUBPART D. COMPLIANCE.**

**7.10 Compliance.** Each agency head shall cooperate with the Board to ensure compliance with the training requirements for City officers and employees, including through the provision of information necessary to determine who is required to receive training pursuant to the requirements of Paragraphs 7.7, 7.8 and 7.9 above.

**SUBPART E. REMEDIES**

**7.11** Failure to comply with the requirements set forth in Subparts B-D of this regulation may result in penalties as further provided for in Philadelphia Code Section 20-1301.

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