

Summary of Public Retirement System Gifts and Ethics Policies

ST	System	Essence of / Excerpt from Policy	Governing Authority
AL	Retirement Systems of Alabama	No public official or public employee shall solicit or receive a thing of value for himself or herself or for a family member of the public employee or family member of the public official for the purpose of influencing official action. (N)othing in this section shall be construed to prohibit a public official or public employee from the performance of his or her official duties or responsibilities.	Alabama State Code of Ethics
AR	Arkansas PERS	<p>It is the obligation of every member of the Board of Trustees (“Board”, “Trustees”, “Trustee”) to conduct him or herself in a manner that promotes public confidence in the integrity, impartiality, professionalism and ethical behavior of APERS in its relations with retirees, beneficiaries, members, employers, the public, staff, and professional service providers. This Travel and Gift Policy shall apply to all members of the Board of Trustees.</p> <p>Standards of Conduct</p> <p>1. General Provisions Trustees shall:</p> <ul style="list-style-type: none"> • Conduct all System business in a fair and reasonable manner. • Avoid any activity which may be interpreted as, or give the appearance of, a conflict of interest. • Refrain from financial and business dealings that would reflect adversely on the member’s impartiality, interfere with the proper performance of duties or conflict with the execution of System business activities. • Communicate promptly to the Chair or Vice Chair of the Board information or actions which may be violations of the law or of this Travel and Gift Policy, or which may be viewed as conflicts of interest. <p>2. Gifts</p> <p>Trustees shall duly report gifts with a fair market value of more than \$100.00 from any source, including without limitation, consultants, advisors, service providers, vendors, or prospective vendors of the System, in accordance with the rules set forth by the Arkansas Ethics Commission.</p> <p>A “gift” does not include</p> <ul style="list-style-type: none"> • Food or beverages provided in connection with a business meeting, educational seminar, conference or convention. • Food or beverages provided in return for participation in a bona fide panel, seminar, speaking engagement at which the audience is a civic, social, or cultural organization or group. • Promotional or marketing items or materials distributed or made available to all attendees at a business meeting, educational seminar, conference or convention. • Anything with a value of \$100.00 or less. • Any other item or activity deemed exempt by the Arkansas Ethic Commission. <p>3. Travel and Related Expenses</p> <ul style="list-style-type: none"> • Except as provided below, the reasonable or necessary expenses of travel, lodging, meals and incidentals for Trustees traveling on behalf of APERS shall be paid by the System. This provision applies to all travel related to any business meeting, educational seminar, conference or convention attended by any Trustee. Such reimbursement shall conform to the rules set forth by the Arkansas Department of Finance & Administration. • Payments or partial payments for travel, lodging and/or meals in excess of \$150.00 by a nongovernmental source in instances where a Trustee is appearing in his or her capacity as a Board member are not considered gifts but must be reported in accordance with the rules set forth by the Arkansas Ethics 	APERS Travel and Gifts Policy

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		<p>Commission.</p> <ul style="list-style-type: none"> • In no event shall a Trustee accept payment of any expenses related to travel, the purpose of which is to determine the selection of new professional service or other contractors or to determine the assignment of continuing or additional business to existing contractors. • Whether or not travel expenses for a Trustee are paid by the System or another source, payment of such expenses for the spouse, family, or other guest of the Trustee shall be paid by the Trustee. • New trustees are expected to attend one conference or other instructional program on fiduciary responsibilities and pension administration within twelve months of their appointment. • Trustee travel to more than one [two?] pension-related conferences in a fiscal year must be approved by a vote of the Board prior to undertaking such travel. System-specific business meetings shall not be included in this count. • Nothing in this policy is intended to limit or restrict a Trustee's attendance at a business meeting, educational seminar, conference or convention sponsored by an organization to which the Trustee belongs, with which the Trustee is affiliated in his or her capacity other than as an APERS Board member. 	
AR	Arkansas State Highway & Transportation Dept Retirement System	<p>The giving or receiving of food, lodging, or travel shall not be considered a gift in situations where a public servant is appearing in his or her official capacity and the appearance bears a relationship to the public servant's office or position.</p> <ul style="list-style-type: none"> • For purposes of this rule, a public servant appears in an official capacity when the appearance arises solely because the position held by the public servant, would be subject to expense reimbursement by the agency with which the public servant is associated, and involves matters which fall within the official responsibility of the public servant. • For purposes of this rule, an appearance at an event bears a relationship to the public servant's office or position when such appearance furthers a purpose of the governmental body served by the public servant and the interest of such governmental body outweighs the likelihood that attending the event will improperly influence the public servant in the performance of his or her official duties and responsibilities. Factors to be considered in making a determination as to whether or not an appearance bears a relationship to a public servant's office or position shall include, but not be limited to: the nature of any pending matter affecting the interest of the person paying for the food, lodging, or travel; the importance of the event to the governmental entity; the significance of the public servant's role in the event; the timing of the event; the identity of other expected participants; and, the cost of the public servant attending the event. If a public servant is invited to attend a purely social event with no or a <u>de minimis</u> nexus to the programs or operations of the governmental entity which he or she serves, then the public servant's attendance would not bear a sufficient relationship to his or her office or position to meet the exception contained in subsection (a) of this rule. 	Department policy
AZ	Arizona State Retirement System	<p>Policy: The ASRS will promote and support the professional development and continuing education of the ASRS Staff by facilitating their participation and attendance at selected conferences, training and seminars relating to:</p> <ul style="list-style-type: none"> • Investment Management, • Organization and Management, • Pension or Benefit Administration, • Finance, Budget, Accounting and Auditing, • Other business and legal aspects of the ASRS. <p>Staff are responsible for maintaining the integrity of both the ASRS and the State of Arizona. As a result, no Staff of the</p>	Laws relating to the acceptance of gifts and or gratuities contained in A.R.S. § 38-444 and A.R.S. § 38-504 (C), Arizona

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		<p>ASRS is permitted to:</p> <ol style="list-style-type: none"> 1. Use his or her official position or attendance at a conference, seminar or training for personal gain. 2. Solicit or accept gifts, gratuities, or favors. 3. Permit himself or herself to be placed under any kind of personal obligation that could lead a person to expect official favors. <p>Prohibitions in this policy are in effect any time Staff is on official business for the ASRS or State of Arizona.</p> <p>Policy Guidelines</p> <p><u>Acceptable:</u></p> <ul style="list-style-type: none"> • ASRS paid attendance, registration, transportation, meals, lodging, at a conference, seminar, training or meeting if attendance at the conference, seminar, training or meeting is a benefit to the ASRS or enhances the performance of official duties. The employee may participate in a group activity open to all attendees of the conference, seminar, training or meeting if included in the registration fee. • ASRS paid attendance <u>and/or</u> complimentary registration, transportation, meals, lodging at a conference, seminar, training or meeting if a Staff member is a speaker or participant and no conflict exists in the relationship between the sponsoring entity and the ASRS. The employee may participate in a group activity open to all attendees of the conference, seminar, training or meeting if included in the registration fee. Attendance at the conference must be a benefit to the ASRS or enhance the performance of official duties. • Complimentary attendance, registration, transportation, meals, lodging, or a group activity which is open to all participants at the conference, seminar, training or meeting, if the complimentary attendance is paid by an entity with no past, present or potential contracts with the ASRS. Attendance at the conference must be a benefit to the ASRS or enhance the performance of official duties. • If the ASRS employee is a member of a board or advisory council or in a capacity of influence with a particular investment entity, and the business meeting is held as a lunch or dinner, the employee may attend and often should attend as a fulfillment of their fiduciary responsibility in that capacity. • Meals at a conference that are underwritten by an entity other than the conference organizer if the meal is listed on the conference agenda and the sponsorship of such meal does not appear to influence ASRS decision making. • Conference, seminar or training by contractors when the ASRS has executed a contract with the vendor and the training/seminar/conference costs are included in the contract fee. • Conference, seminar or training event activities if the activity is included and available to each participant. <p><u>Not Acceptable:</u></p> <ul style="list-style-type: none"> • Alcoholic beverages shall not be accepted or consumed by staff of the ASRS while representing the ASRS, including conferences, normal business activities, seminars, etc., if paid for by a potential or current contractor of the ASRS. The ASRS staff member may purchase and consume, with his/her own money (including per diem) alcoholic beverages but only during non-business hours and while not representing the ASRS. However, all ASRS employees are subject to the following section of the ADOA personnel rules: Standards of Conduct R2-5-501 - An employee shall not: Engage in ... other activity that is not compatible with the full and proper discharge of the duties and responsibilities of state employment, or that tends to impair the employee's capacity to perform the employee's duties and responsibilities in an acceptable manner...." 	<p>Administrative Code R2-5-501.</p> <p>Laws relating to Professional Development and Continuing Education contained in A.R.S. § 38-715(D) and the Annual Appropriation Bill.</p> <p>ASRS Policies & Procedures based on state laws and state travel policy</p>

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		<ul style="list-style-type: none"> • Meals paid for by another party, except for those listed in the <i>Acceptable</i> section above. • Nothing shall be accepted from a company responding to or likely to respond to an active solicitation until all contracts are awarded, even if the item in question is listed in the <i>acceptable</i> section above. • Gifts, regardless of value. Gifts will be returned to the sender if practicable and there is no expense to the state for the return. If not practicable to return the gift, it will be given to charity or if it is perishable, will be placed in the Members Services Center waiting room for the enjoyment of members who come into the office. Notice will also be sent to the providing vendor asking them not to persist in sending gifts. • Any gift sent directly to an employee's home or accepted by a member of the employee's family. Tickets or other passes to entertainment activities such as sporting events, concerts, etc., unless part of a conference agenda and included in the conference fee for all attendees. • Gifts offered solely because of a person's ASRS affiliation. • Vendor training not related to the vendor's contracted product or service that may be construed as solicitous. <p>Loans other than those made through channels available to all consumers.</p>	
CA	CalPERS	<p>Except as provided below, CalPERS shall pay for all approved CalPERS Board Member travel (including transportation and related meals and lodging). Exceptions:</p> <ol style="list-style-type: none"> 1. While traveling, Board Members may participate in meals provided by third parties. In these situations, Board Members may not claim per diem reimbursement for such meals and must comply with the Political Reform Act (Gov. Code sec. 81000 et seq.) and the Board's disclosure policies and procedures, as applicable. 2. Board Members may accept payment for necessary transportation, meals and lodging from a conference organizer, when the receipt of such is in connection with a speech as defined in regulations implementing the Political Reform Act and does not constitute a reportable "gift" under the Political Reform Act. Before accepting such payment, Board Members should consult with CalPERS Legal Office to determine whether or not a reportable gift will result. If a Board Member inadvertently accepts payment for speech-related travel that constitutes a reportable gift, the Board Member must comply with all policies and procedures required under the Political Reform Act as well as the Board's own disclosure policies and procedures. 3. Board Members may accept payment for transportation, meals or lodging that are paid by a third party with a contractual obligation to CalPERS to pay for such expenses. (For example, if a Board Member represents CalPERS at a meeting of an Advisory Committee related to an Alternative Investment, and the partnership agreement requires that Advisory Committee expenses be paid by the partnership, the Board Member may accept payment and no reportable gift exists.) 4. The Board may accept a gift of travel-related expenses, donated to CalPERS under the conditions of California Code of Regulations section 18944.2. These conditions are: <ol style="list-style-type: none"> a. CalPERS receives and controls the payment. b. The payment is used for travel that has been approved by CalPERS for official CalPERS business. c. CalPERS, in its sole discretion, determines the specific CalPERS Board Member or employee who will use the payment, consistent with the donor's stated purpose. d. CalPERS appropriately memorializes the payment in a written public record, using the forms that are attached to this Policy. <p>In addition, the Board will only accept a gift to CalPERS of travel-related expenses from donors who meet all of the following criteria:</p>	Board travel policy

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		<p>I. The donor is sponsoring an event that is designed to provide an opportunity to the invited CalPERS participant to discuss public policy or private practices relevant to the mission of CalPERS.</p> <p>II. The CalPERS representative is participating in the event as a contributor to the general educational and communication objectives of the event.</p> <p>III. The donor is not an organization that does, or is of the type likely to do, business for gain with CalPERS. The Board President will determine whether to accept a gift to CalPERS, and will designate the CalPERS Board Member or, with the concurrence of the Chief Executive Officer, a CalPERS employee, to attend the event. The Board President may be designated as the attendee only with the approval of Board Vice President and concurrence of the Board.</p>	
CA	CalSTRS	<p>Any party who “engages in business with CalSTRS for gain” shall disclose the following: Campaign contributions as defined under the Political Reform Act, valued in excess of \$250, made to any official covered in section 3 of this policy. No party who “engages in business with CalSTRS for gain” shall provide gifts to Board members or to CalSTRS Staff, as follows:</p> <p>A. Any charitable contribution, valued in excess of \$250 individually or in the aggregate in any calendar year, made at the request of any official covered in this section.</p> <p>B. Gifts, meals, or entertainment, with a cumulative value equal to or exceeding \$390 individually or in the aggregate in any calendar year, given to any official covered in this section. The dollar amount of this limit shall be adjusted biennially in each odd numbered year to reflect the cost of living adjustments made by the Fair Political Practices Commission to the gift limit contained in Government Code section 89503. This prohibition shall not extend to meals or related expenses provided under the following circumstances:</p> <p>i. Food, beverages and registration at group events to which substantial numbers of employees of an institution are invited;</p> <p>ii. Actual and reasonable expenses for food, beverages, travel, lodging and/or registration provided to permit participation in a meeting directly tied to official or professional duties if participation has been approved in writing by the Chief Executive Officer (for CalSTRS staff) or by the CalSTRS Board (for Board members).</p>	Board Policy on Ethical and Fiduciary Conduct
DE	Delaware PERS	<p>No Trustee, Committee member or DPERS’ employee shall accept other employment, any compensation, gift, payment of expenses or any other thing of monetary value (unless it is a token, educational or promotional item of nominal value) under circumstances in which such acceptance may result in any of the following:</p> <p style="padding-left: 40px;">(1) Impairment of independence of judgment in the exercise of official duties</p> <p style="padding-left: 40px;">(2) An undertaking to give preferential treatment to any person;</p> <p style="padding-left: 40px;">(3) The making of a governmental decision outside official channels; or</p> <p style="padding-left: 40px;">(4) Any adverse effect on the confidence of the public in the integrity of the government of the State.</p>	DE PERS Board Code of Conduct
FL	Florida Retirement System	<p>Florida statutes prohibit soliciting or accepting anything of value, including a gift, loan, reward, promise of future employment, favor, or service that is based on any understanding that the employee’s action or judgment will be influenced by the gift.</p>	Florida statutes
HI	Hawaii ERS	<p>No legislator or employee shall solicit, accept, or receive, directly or indirectly, any gift, whether in the form of money, service, loan, travel, entertainment, hospitality, thing, or promise, or in any other form, under circumstances in which it can reasonably be inferred that the gift is intended to influence the legislator or employee in the performance of the legislator's or employee's official duties or is intended as a reward for any official action on the legislator's or employee's part.</p>	State code of ethics

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ID	PERSI	<p>No public servant having any discretionary function to perform in connection with contracts, purchases, payments, claims or other pecuniary transactions of the government shall solicit, accept or agree to accept any pecuniary benefit from any person known to be interested in or likely to become interested in any such contract, purchase, payment, claim or transaction.</p> <p>This section shall not apply to:</p> <ul style="list-style-type: none"> (a) fees prescribed by law to be received by a public servant, or any other benefit for which the recipient gives legitimate consideration or to which he is otherwise legally entitled; or (b) gifts or other benefits conferred on account of kinship or other personal, professional or business relationship independent of the official status of the receiver; or (c) trivial benefits not to exceed a value of fifty dollars (\$50.00) incidental to personal, professional or business contacts and involving no substantial risk of undermining official impartiality. 	Idaho Statutes Title 18, Crimes and Punishments, Chapter 13, Bribery and Corruption
IL	Illinois State Universities Retirement System	<p>Gifts are prohibited, but a "gift" does not include:</p> <ul style="list-style-type: none"> • Travel expenses for a meeting to discuss SURS business, as defined by rules adopted by the Illinois Executive Ethics Commission. • Food or refreshments not exceeding \$75 per person in value on a single calendar day; provided that the food or refreshments are (i) consumed on the premises from which they were purchased or prepared or (ii) catered. For the purposes of this Section, "catered" means food or refreshments that are purchased ready to eat and delivered by any means. 	SURS policies and procedures
IL	Illinois Municipal Retirement Fund	<p>IMRF Trustees and staff shall not:</p> <ul style="list-style-type: none"> • accept a gift having a value over \$25 or solicit any gift, favor, or service from any third party which has, is or may do business with the Illinois Municipal Retirement Fund unless the service is transportation to and from a permitted meal; • accept free travel or accommodations from any third party which has, is or may do business with the Illinois Municipal Retirement Fund; • accept meals on an individual basis from any third party which has, is or may do business with the Illinois Municipal Retirement Fund unless such meal arises out of independent activities not related to the person's role with the Illinois Municipal Retirement Fund or unless it is a member of management staff as determined by the Executive Director. 	IMRF board travel policy
IN	Indiana Teachers' Retirement Fund and Public Employees' Retirement Fund	<ul style="list-style-type: none"> a. A state employee or special state appointee, or the spouse or unemancipated child of a state employee or special state appointee, shall not knowingly solicit, accept, or receive any gift, favor, service, entertainment, food, drink, travel expenses; or registration fees from a person who has a business relationship with the employee's or special state appointee's agency or is seeking to influence an action by the employee or special state appointee in his or her official capacity. b. The following shall not be subject to this rule: <ul style="list-style-type: none"> 1. Gifts, favors, services, entertainment, food, drink, travel expenses or registration fees from public agencies or public institutions. 2. Food or drink consumed at a public meeting to which at least twenty-five (25) individuals are invited. A meeting will be considered public if: <ul style="list-style-type: none"> A. the event is a reception or other gathering for public officials that is not arranged to solicit government procurement of goods or services; B. the employee is giving a speech or participating in a presentation in the employee's official capacity; 	State ethics code

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		<p style="text-align: center;">or</p> <p style="text-align: center;">C. the meeting has a formal educational program that the employee is attending to assist him or her in performing official duties.</p> <ol style="list-style-type: none"> 3. Mementos or souvenirs of nominal value. 4. Food or drink consumed by an employee during negotiations or other activities related to an Indiana economic development corporation economic development project. 5. Gifts, favors, services, entertainment, food, or drinks from relatives, or a person with whom the employee or special state appointee has an ongoing social relationship, so long as: <ol style="list-style-type: none"> A. the gifts or other items of value are not deducted as a business expense; and B. the gift giver is not seeking to influence an action by an employee or special state appointee in that person's official capacity. 6. Political contributions subject to IC 3-9-2 that are reported in accordance with applicable law. 7. Nominal refreshments offered to a state employee or a special state appointee conducting official state business while the employee or special state appointee is at a workplace of a person who has a business relationship; or seeks to influence official action with the employee's or special state appointee's agency. 	
KY	Kentucky Retirement Systems	<p>An executive branch employee, spouse or dependent child (including KRS trustees) should not knowingly accept gifts or gratuities totaling a value greater than \$25, in a single calendar year, from any person or business that does business with, is regulated by, is seeking grants from, is involved in litigation against, or is lobbying or attempting to influence the actions of the state agency for which the employee works or from any group or association which has as its primary purpose the representation of such persons or businesses. Acceptance of such gifts may appear to be a conflict of interest and may damage public confidence.</p> <p>Exceptions: As exceptions to the above prohibitions, acceptance of the following gifts is permissible:</p> <ul style="list-style-type: none"> • A campaign contribution to an employee's own campaign if in compliance with the campaign finance laws; • A gift from a family member; • Door prizes, available to the public; • A ticket for admission to a sporting event if the ticket or admission is paid for by the employee at face value. 	State statute

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LA	Louisiana State Employees Retirement System	<p>Trustees and employees of the Louisiana State Employees' Retirement system (LASERS) are unable to accept a gift or gratuity from any person or from any officer, director, agent or employee of any company or contractor doing business with LASERS or seeking to do business with LASERS.</p> <p>We are prohibited from accepting "anything of economic value" for any service, where the subject is devoted substantially to the responsibilities, programs, or operations of LASERS (R.S. 42:1111). Nor can we accept anything of "economic value" from anyone who has or is seeking to obtain contractual or other business or financial relationships with LASERS (R.S. 42:1115).</p> <p>Notwithstanding the above prohibitions, R.S. 11:1102(22) (a) provides that "anything of economic value" shall not include "promotional items having no substantial resale value; or food, drink, or refreshments consumed by a public servant in the presence of the person or the officer, director, agent or employee of any company or contractor doing business with LASERS or seeking to do business with LASERS.. This includes reasonable transportation and entertainment incidental thereto, while the personal guest of said person."</p>	Louisiana Code of Governmental Ethics
MA	Massachusetts Teachers' Retirement Board	<p>Board policy and state statute prohibit board members or staff from soliciting or receiving anything of "substantial value" for or because of any official act or act within his/her official responsibility performed or to be performed by such official. Board policy and ethics commission rules prohibit board member or staff from using or attempting to use his/her official position to secure for himself or others unwarranted privileges or exemptions which are of "substantial value" and which are not properly available to similarly situated individuals. "Substantial value" means anything with a value of \$50 or more. This means, on a practical level, that board members and staff are prohibited from accepting gifts valued at \$50 or more, regardless of whether there is a quid pro quo connection to an official act. To fall within the prohibition, the gift need only be given because of the official's position. Gifts include, but are not limited to, meals, travel, sports tickets, and golf fees. Gifts to a family member are included within the prohibition.</p>	MTRB ethics policies and practices
MD	Maryland State Pension and Retirement System	<p>Staff and Trustees are not permitted to solicit or receive gifts. Any gift valued over \$20 must be disclosed on an annually filed financial disclosure form.</p> <p>Exceptions:</p> <ul style="list-style-type: none"> • meals or beverages received and consumed by the official or employee in the presence of the donor or sponsoring entity; • in return for participation on a panel or a speaking engagement at a meeting, reasonable expenses for food, travel, lodging, or scheduled entertainment of the official or employee if the expenses are associated with the meeting, except that, if such expenses for a State official of the Legislative or Executive Branch are to be paid by a regulated lobbyist and are anticipated to exceed \$500, the official shall notify the appropriate advisory body before attending the meeting. 	Laws set forth by state ethics commission
MI	Michigan Office of Retirement Services	<p>The solicitation, acceptance, or agreement to accept anything of value from any designated representative that could reasonably be expected to influence the manner in which the employee performs work or makes decisions.</p> <p>An employee may attend a conference, training session, or other meeting in which the expenses are paid in whole or in part by a designated representative, if 1) the employee's attendance is primarily for the benefit of the state; 2) the expenses paid are expenses, which if paid by the employee, would be reimbursable items under the standardized travel regulations; and 3) the employee's appointing authority determines that paid attendance by the employee would not reasonably be expected to improperly influence how the employee performs work or makes decisions.</p>	Rules of the Civil Service Commission regarding ethical standards, and guidelines to comply with those rules

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MN	Minnesota PERA, SRS, and TRA	<p>An official may not accept a gift from a lobbyist or principal. Exceptions to this rule:</p> <ul style="list-style-type: none"> • services to assist an official in the performance of official duties, including but not limited to providing advice, consultation, information, and communication in connection with legislation, and services to constituents; • food or a beverage given at a reception, meal, or meeting away from the recipient's place of work by an organization before whom the recipient appears to make a speech or answer questions as part of a program. <p>The prohibitions in this section do not apply if the gift is given because of the recipient's membership in a group, a majority of whose members are not officials, and an equivalent gift is given to the other members of the group.</p>	State ethics law
MO	Local Govt ERS (LAGERS)	MO LAGERS does not have a policy.	
MO	Missouri State Employees Retirement System	<p>No trustee or employee of the system shall receive any gain or profit from any funds or transaction of the system, except benefits from interest in investments common to all members, if entitled thereto.</p> <p>Any trustee or employee accepting any gratuity or compensation for the purpose of influencing his action with respect to the investment of the funds of the system shall thereby forfeit his office and in addition thereto be subject to the penalties prescribed for bribery.</p> <p>Members will annually disclose their involvement with other organizations, vendors, or any other associations that might produce a conflict.</p>	State statute and board governance policy
MS	Mississippi PERS	No policy on gifts. MS PERS has adopted the NCTR Policy: Board members, as fiduciaries, shall discharge their duties solely in the interests of the participants for the exclusive purpose of providing benefits to the participants and their beneficiaries.	NCTR Members' Code of Conduct; MS State Ethics Policy
ND	North Dakota Teachers Fund for Retirement	Board members shall refrain from financial and business dealings that tend to reflect adversely on their impartiality or interfere with the proper performance of their duties.	NDTFFR's Code of Conduct
NM	New Mexico PERA and ERB	<p>Except for gifts of food or beverage given in a place of public accommodation, consumed at the time of receipt, not exceeding fifty dollars (\$50.00) for a single gift and the aggregate value of which gifts may not exceed one hundred fifty dollars (\$150) in a calendar year, neither a board member nor an employee of the board shall receive or accept anything of value directly or indirectly from a person who:</p> <ul style="list-style-type: none"> • has a current contract with the retirement board or association; • is a potential bidder, offeror or contractor for the provision of services or personal property to the retirement board or association; • is authorized to invest public funds pursuant to state or federal law or is an employee or agent of such a person. 	NM Statutes
NV	Nevada Public Employees Retirement System	<p>A Retirement Board member or member of staff is allowed to accept appropriate gifts. A gift is not appropriate if it would tend improperly to influence a reasonable person to depart from the faithful and impartial discharge of his duties. Each individual is responsible to make the determination as to what is appropriate for themselves, and within the confines of the Ethics in Government statute.</p> <p>Retirement Board and members of the staff shall disclose receipt of any gift with a value in excess of \$25.00 by completing an</p>	Nevada PERS Board adopted policy. Much of the policy is derived from the

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		Ethics Disclosure Form for each gift received and submit the completed forms to the Administrative Assistant, on a monthly basis, as gifts are received. A monthly Consolidated Ethics Disclosure report, including all forms received, will be provided in monthly Board packets.	Nevada Ethics in Government statutes
OH	Ohio Public Employees Retirement System	The board encourages trustees to attend educational seminars and conferences to advance trustee education and understanding of various retirement system topics and to assist trustees in properly fulfilling their fiduciary responsibilities. Pursuant to Ohio statute, the board must approve in advance of all out-of-state board travel at its public meetings. Registration, hotel, and travel arrangements are handled on the board's behalf by staff. Staff will also assist board members with expense reimbursement after the travel is completed. Board members are prohibited from soliciting or accepting payment of OPERS business related travel expenses, including expenses incurred with the travel for lodging, meals, food and beverages, from anyone other than OPERS.	Board governance policy
OH	Ohio School Employees Retirement System	Board members and employees are required to avoid conflicts of interest, favoritism, bias, or the appearance of impropriety. The following is a partial list of conduct that is prohibited in furtherance of this policy: <ol style="list-style-type: none"> a. Board members and staff are prohibited from accepting anything of value from persons doing business with or seeking to do business with SERS. <ul style="list-style-type: none"> • “Anything of value” is defined as anything whose monetary value is not nominal and includes gifts, money, consulting fees, food or beverages, tickets to social events, golf outings, and travel expenses. Ohio’s ethics laws do not provide a dollar threshold for “nominal.” b. Board members, the executive director, licensed investment officers, and any other employee who exercises material discretion in the investment of SERS’ funds are prohibited from accepting any honoraria. Other employees may receive honoraria unrelated to their employment from persons who are not doing, or seeking to do, business with SERS. c. Employees must pay the actual value of conferences, including meals. If a registration fee for a conference is reduced or an event is subsidized, SERS employees must pay an amount that reasonably reflects the value of the conference or event. d. Board members, the executive director, licensed investment officers, and any other employee who exercise material discretion in the investment of SERS’ funds cannot accept the payment of actual travel expenses from any source other than SERS regardless of the source or the nominal nature of the expense. <ul style="list-style-type: none"> • SERS’ Travel Policy provides that it will reimburse board members and employees for actual, proper, and reasonable expenses incurred for attending appropriate meetings, seminars, and conferences. Board members who have served more than one year must obtain Board approval to attend more than three out of state educational sessions in one year. 	SERS policies and guidelines, which are based on state ethics laws
OH	Ohio State Teachers Retirement System	Each board member shall select such means of continuing education as will best enable them to acquire the information and skills needed. However, each board member has the responsibility to ensure that the expenses incurred are both reasonable and necessary, and that attendance at meetings does not compromise the integrity of the Retirement System or further a personal financial gain. Each board member attending a conference or meeting shall make a report to the board at a following board meeting. A maximum of three members will be reimbursed for the same meeting other than a board meeting. A board member may not accept travel expenses, including transportation, lodging, food or beverages of any type, from any source other than the expense fund.	Board governance policy
OR	Oregon PERS	No public official or candidate for office or a relative of the public official or candidate shall solicit or receive, whether directly or indirectly, during any calendar year, any gift or gifts with an aggregate value in excess of \$100 from any single	Oregon statutes regarding

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ST	System	Essence of / Excerpt from Policy	Governing Authority
		<p>source who could reasonably be known to have a legislative or administrative interest in any governmental agency in which the official has ... any official position or over which the official exercises ... any authority.</p> <p>“Gift” means something of economic value given to a public official or the public official’s relative without valuable consideration of equivalent value, including the full or partial forgiveness of indebtedness, which is not extended to others who are not public officials or the relatives of public officials on the same terms and conditions; and something of economic value given to a public official or the public official’s relative for valuable consideration less than that required from others who are not public officials.</p> <p>However, “gift” does not mean:</p> <p>...</p> <ul style="list-style-type: none"> • The giving or receiving of food, lodging and travel when participating in an event which bears a relationship to the public official’s office and when appearing in an official capacity, subject to the reporting requirement of ORS 244.060 (6). • The giving or receiving of food or beverage if the food or beverage is consumed by the public official or the public official’s relatives in the presence of the purchaser or provider thereof. • The giving or receiving of entertainment if the entertainment is experienced by the public official or the public official’s relatives in the presence of the purchaser or provider thereof and the value of the entertainment does not exceed \$100 per person on a single occasion and is not greater than \$250 in any one calendar year. 	practices and standards
PA	Pennsylvania Public School Employees’ Retirement System	<p>No member of the Board shall solicit or accept reimbursement, or permit payment to be made on his or her behalf, for the expenses of travel, accommodations, subsistence, and incidentals while on official Board business by any person other than the Board itself or other agency of the Commonwealth, it being the policy of the Board that members be reimbursed by the Board for the reasonable and necessary expenses of attending to Board business.</p> <p>Nothing in this subsection shall preclude (i) reimbursement or payment of Costs, as defined in the Board's Travel and Education Policy, by the approved pension industry organizations identified in the Board's Travel and Education Policy, (ii) the acceptance of food, refreshments, and/or recreational opportunities which are included as part of an educational conference or other officially approved meeting for which an inclusive registration fee is charged and is payable or reimbursable by the Board subject to any required Commonwealth approvals, regardless of whether the sponsorship of such conference or meeting may include, directly or indirectly, current or prospective State consultants, or (iii) other acceptance of food and refreshments of nominal value in the ordinary course of a luncheon or dinner meeting or other meeting; provided, however, that members of the Board may not accept any such benefit or thing of monetary value under circumstances which could raise a legitimate question about their ability to fairly, impartially, and prudently perform their duties on the Board.</p> <p>Staff Guidelines for Accepting Gifts:</p> <ul style="list-style-type: none"> • The general rule is that employees of the Commonwealth may not solicit or accept for personal use any gift, gratuity, favor, entertainment, loan, or other thing of monetary value from a person who does business or wants to do business with the Commonwealth. • The only exception to this general rule is for the acceptance of gifts of nominal value. • PSERS has internally defined gifts of nominal value as being those gifts that are under \$50.00. 	PSERS bylaws

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ST	System	Essence of / Excerpt from Policy	Governing Authority
		<ul style="list-style-type: none"> • Under no circumstances, however, may an employee solicit a gift, regardless of its value. • Likewise, under no circumstances may a PSERS employee either solicit or accept a gift of alcohol, regardless of its value. Examples of items of nominal value are: <ul style="list-style-type: none"> ○ An infrequent meal as part of a legitimate business meeting; ○ A gift of nominal value on a rare occasion including such things as a pen, a coffee mug, stuffed animal or similar items; ○ A gift of nominal value with an organization’s advertisement printed on it such as a tee shirt or baseball cap; ○ A nominal value food item, ○ A nominal value event (play, sporting event) that is included in the package for everyone attending a conference or training session; and ○ Prizes of nominal value won at a trade show attended as part of the employees’ job duties. 	
PA	Pennsylvania State Employees Retirement System	<ul style="list-style-type: none"> • In taking action on any investments and disbursements of moneys of SERS, neither [Board members and designees of Board members] nor, to their knowledge, any of their immediate family members (such person’s spouse, parents, children and siblings and the spouses of any such individuals) shall profit therefrom, either directly or indirectly, and they shall invest and manage the moneys and other assets of SERS for the exclusive benefit of the members of SERS, subject to any limitations, exceptions and directives in any applicable law. • They shall not solicit or accept, for themselves or for any other person or entity, a gift, gratuity, favor, entertainment, loan or other thing of monetary or economic value (except where its value is truly de minimus or where it is being received by virtue of being a member of a broad general class, such as being a shareholder of a public corporation) from those persons and entities engaged or proposing to engage in transactions with SERS or the affiliates of such persons and entities. • They shall not receive any compensation or enter into any agreement for compensation for services rendered or to be rendered to any person or entity in connection with any transaction involving SERS. 	State Employees’ Retirement Board Ethical Conduct Policy
RI	Rhode Island ERS	<p>No person subject to the Code of Ethics, either directly or as the beneficiary of a gift or other thing of value given to a spouse or dependent child, shall accept or receive any gift of cash, forbearance or forgiveness of indebtedness from an interested person, as defined herein, without the interested person receiving lawful consideration of equal or greater value in return.</p> <p>No person subject to the Code of Ethics, either directly or as the beneficiary of a gift or other thing of value given to a spouse or dependent child, shall accept or receive any gift(s) or other thing(s) having either a fair market value or actual cost greater than twenty-five dollars (\$25), but in no case having either an aggregate fair market value or aggregate actual cost greater than seventy-five dollars (\$75) in any calendar year including, but not limited to, gifts, loans, rewards, promises of future employment, favors or services, gratuities or special discounts, from a single interested person, as defined herein, without the interested person receiving lawful consideration of equal or greater value in return.</p>	Rhode Island State Code of Ethics
SC	South Carolina Retirement System	<p>No public official of any state agency or any of their employees may accept from a lobbyist or lobbyist principal, or a person acting on behalf of a lobbyist or lobbyist principal any of the following:</p> <p>(1) lodging; (2) transportation; (3) entertainment; (4) food, meals, beverages, money, or any other thing of value; (5) or an invitation to a function paid for by a lobbyist principal except for:</p> <p>(A) as to a public official of a state agency, board, or commission, a function to which an official of a state agency, board, or commission is invited if the entire board or commission of which the public official is a member is invited by the lobbyist</p>	State ethics law

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		<p>principal;</p> <p>(B) as to public employees, except for public employees of any statewide constitutional officer, a function to which a public employee is invited if a public official of the agency or department by which the public employee is employed also is invited under another provision of this section;</p> <p>(C) as to public employees of any statewide constitutional officer, a function to which all statewide constitutional officers are invited;</p> <p>(D) as to a public official or a public employee the value of lodging, transportation, entertainment, food, meals, or beverages exceeding fifty dollars in a day and four hundred dollars in a calendar year per public official, public employee, or cabinet officer.</p> <p>(E) Any public official or any public employee who is required to file a statement of economic interests and who accepts lodging, transportation, entertainment, food, meals, or beverages under the relevant subsection must report on his statement of economic interests the value of anything received.</p>	
SD	South Dakota Retirement System	Does not have a policy on this subject.	
TN	Tennessee Consolidated Retirement System	<p>No employee shall solicit or accept, directly or indirectly, any gift including but not limited to any gratuity, service, favor, entertainment, lodging, transportation, loan, loan guarantee or any other thing of monetary value, from any person or entity that:</p> <ul style="list-style-type: none"> • Has, or is seeking to obtain, contractual or other business or financial relations with the Treasury Department; or • Conducts operations or activities that are regulated by the Treasury Department; or • Has interests that may be substantially affected by the performance or nonperformance of the employee's official duties. <p>Unsolicited meals of reasonable value and modest entertainment accepted on an infrequent basis are excluded from the prohibition of accepting gifts. Employees must disclose any gifts, meals and entertainment to their division director.* Disclosure of unsolicited diminutive gifts, activities offered in connection with a conference or seminar, or perishable food items made available to all department employees is not required. An employee is not permitted to accept anything of value from any person or entity that is a registered lobbyist or the employer of a lobbyist.</p>	TN Department of Treasury's Standards of Professional Conduct and Gift Policy
TX	Employees' Retirement System of Texas	<p>All Trustees and ERS staff who are responsible for investment decisions or who are involved in the management of the Fund's assets shall not solicit, accept, or agree to accept any gifts of more than <i>de minimis</i> value, personal benefits, or personal favors offered to them because of their positions with the ERS. Cash gifts are prohibited.</p> <ul style="list-style-type: none"> • An employee may not use or attempt to use their position for the purpose of obtaining personal and/or financial benefit, favor, concession, gifts, or other advantage. • An employee may not accept or solicit any gift, favor, or service that might reasonably tend to influence such person in the discharge of official duties or that they know or should know is being offered with the intent to influence their official conduct. • An employee may not intentionally or knowingly solicit, accept, or agree to accept any benefit for having exercised official powers or performed official duties in favor of another. • An employee may not accept employment in any business or professional activity that they might reasonably expect would require or induce them to disclose confidential information acquired by reason of their official position. 	ERS Investment Policy and Texas Government Code

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ST	System	Essence of / Excerpt from Policy	Governing Authority
TX	Texas County & District Retirement System	<p>A trustee or key employee is prohibited from soliciting or accepting a gift because of or through use of the key employee's or trustee's position with TCDRS if the gift is from a person other than an employee or a trustee and the key employee or trustee knows or should have known that the gift would not have been solicited, offered, or given had the key employee or trustee not held his or her position as a key employee or trustee. This prohibition applies not only to gifts solicited or given for the personal benefit of the trustee or key employee but also to gifts to third parties.</p> <p>The prohibitions in this article do not apply to the following gifts, provided that acceptance of such gifts violates no law:</p> <ul style="list-style-type: none"> • gifts given on special occasions between key employees, employees, and/or trustees; • books, pamphlets, articles or other such materials which contain information directly related to the job duties of an key employee or trustee and are accepted by the key employee or trustee on behalf of TCDRS for use in performing his or her job duties; • gifts from relatives of key employees or trustees which are based solely on a personal relationship between the trustee or key employee and his or her relative; • business meals and receptions when the donor or a representative of the donor is present; • ground transportation in connection with business meetings, meals, or receptions; • seminar or conference fees when the seminar relates to the trustee's or key employee's job duties and is sponsored by TCDRS's consultants or agents, prospective consultants or agents, or persons or entities whose interests may be affected by TCDRS; • items with a value of less than \$50, excluding cash or negotiable instruments, and other gifts of nominal value. Examples of gifts of nominal value are (a) modest items of food and refreshments on infrequent occasions and (b) unsolicited advertising or promotional material such as plaques, certificates, trophies, paperweights, calendars, note pads, pencils, and other items of nominal intrinsic value. <p>Attendance by trustees or key employees at seminars or conferences sponsored and paid for by TCDRS's consultants or agents, prospective consultants or agents, or persons or entities whose interests may be affected by TCDRS that involve entertainment or recreation may in some cases be in the best interest of TCDRS. Nevertheless, in order for trustees or key employees to accept entertainment or recreation associated with a conference or seminar, an officer or employee of the consultant, prospective consultant, or other person or entity must be present at the activity. Trustees or key employees who are elected officials or candidates for elected office may not accept or solicit a contribution for their political campaign offered because of their position with TCDRS. If such a contribution is accepted from a potential service provider, the trustee or key employee has an affirmative duty to disclose such contribution and to recuse himself or herself from relevant deliberations and actions relating to that service provider.</p>	TCDRS Investment Policy Code of Ethics

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ST	System	Essence of / Excerpt from Policy	Governing Authority
UT	Utah Retirement Systems	<p>(The URS board also follows this policy.) An employee shall not accept any monetary gift or gift that exceeds \$50 in value. An employee shall not accept meals, beverages, admission to social, art, sporting events, or other social activities unless there is a business purpose or unless the total value of whatever is offered is less than \$50.</p> <p>In order for an event or activity to have a business purpose, the employee must be accompanied by the vendor and business discussed. An employee shall not accept tickets, vouchers, or other offerings which have a combined face value of \$50 or more unless the vendor is in attendance and participates with the employee.</p>	URS Personnel Policies and Procedures
VA	Educational Employees' Supplementary Retirement System of Fairfax County	<p>(A similar policy is in place for board members.) ERFC executive staff members shall not accept material gifts of value, travel, or entertainment that exceed normal and proper business practices; nor shall individual staff members accept such gratuities that single them out for special favor. For example, the ERFC executive staff will not collectively or individually accept golf weekends, Super Bowl tickets, etc. However, if ERFC staff members are attending a convention or meeting at which a manager sponsors an event, such as a golf outing for clients or the entire attendance of a meeting, the staff members may participate in such activities.</p> <p>On occasion, staff members are invited to dinners and special events sponsored by a business. Staff members may attend, provided that these events are within normal business practices and are arranged solely for the purpose of improving their knowledge of the provider and business services they offer.</p>	System Staff Standards of Conduct Policy
VA	Virginia Retirement System	<p>No Board member shall solicit or arrange a gift or favor for him or herself or for any other person from any actual, prospective, or potential outside investment manager, vendor, or consultant of VRS, from any investment fund in which VRS is an investor, is considering becoming an investor, or may at some time consider becoming an investor, or from any affiliate of any such person.</p> <p>No Board member shall accept any unsolicited gift or favor from any actual, prospective, or potential outside investment manager, vendor, or consultant of VRS, from any investment fund in which VRS is an investor, is considering becoming an investor, or may at some time consider becoming an investor, or from any affiliate of any such person unless it is a token, educational, promotional or advertising item of nominal value (i.e., estimated market value of less than one hundred dollars), and does not compromise, or appear to compromise, the independence or judgment of the Board member.</p> <p>Members of the Board, the Director, the Chief Investment Officer, and the Audit Director, acting in their capacities as such, may accept sponsored travel to give a speech, participate in a panel or seminar, or provide a similar service at a professional or educational conference, convention, or seminar when their participation is requested due to their experience, expertise or opinions related to the performance of their duties for VRS provided that:</p> <ul style="list-style-type: none"> • The source of the funds is not a person or entity that is in a business relationship with VRS, has ever been in a business relationship with VRS, and/or potentially may enter into a business relationship with VRS at any time in the near or distant future; • The speech, seminar, or other forum for which the sponsored travel has been offered will not be publicized, promoted, or represented in any way as being sponsored by a person or entity that is in a business relationship with VRS, has ever been in a business relationship with VRS, and/or potentially may enter into a business relationship with VRS at any time in the near or distant future. <p>In addition to their pledge to abide by the Code of Ethics and Conduct, the Board of Trustees, members of advisory committees, and certain staff are required to submit annual statements of economic interests to the Secretary of the Commonwealth pursuant to the Virginia State and Local Government Conflict of Interests Act.</p>	VRS Board of Trustees Code of Ethics and Conduct

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ST	System	Essence of / Excerpt from Policy	Governing Authority
VT	Vermont TRS, SERS, and MERS	The reasonable and necessary expenses of travel, meals, incidentals for a trustee or employee ... shall be paid by the system if approved prior to the travel by the board. The agenda, written materials pertaining to the event, when available, an estimate of the cost of the trip, and the names of all sponsors of the event, shall be provided to the board at the time approval is requested. If approval is granted, the trustee or employee shall report to the board at the next scheduled meeting that he or she attends, on the content of the event and whether a vendor or potential vendor attempted to pay any expenses of the trustee or employee or sponsored any function or event in which the trustee or employee participated. Trustees and employees may accept items that are offered to conference participants through a raffle, drawing, or game of chance and have a value of \$100 or less.	Vermont state ethics policy
WA	Washington Department of Retirement Systems	No DRS employee shall accept any gift, gratuity, favor, or anything of economic value from a person regulated by the agency or in a contractual relationship with the agency if the gift could be reasonably expected to influence the employee's action or judgment if viewed as part of a reward for action or inaction. Acceptance of food and/or beverages at a luncheon or dinner meeting or other meeting where an employee is in attendance due to related official duties is acceptable unless the donor of the food and/or beverage is a person who seeks to provide goods and services, and the employee participates in the contractual matter.	DRS Policy HR-1
WA	Washington State Investment Board	The receipt of gifts could impair the integrity, independence, or impartiality of the recipient, or create the appearance of impartiality to the giver. No employee or member of the board shall receive, accept, or solicit anything of economic value if it could be reasonably expected that the gift, gratuity or favor would influence the vote, action, or judgment of the officer or employee; or be considered as part of a reward for action or inaction. Except for items listed below, no employee or member of the board may accept gifts with an aggregate value of \$50 from a single source in a calendar year or a single source from multiple sources with a value in excess of \$50. Except: food and beverages consumed at hosted receptions where attendance is related to the employee's or board member's official duties. A hosted reception is a social event involving a diverse group of people, some who provide goods, services, or investments to the board, and some who do not. It does not involve a sit-down meal. It does not include an event attended only by board members or employees and persons seeking to provide goods, services, and investments to the board.	WSIB Conflict of Interest Policy
WI	Wisconsin Retirement System and SWIB	Wisconsin law forbids a public officer to use free or discounted transportation, traveling accommodation, or communication services for which the supplier would usually charge [§946.11, Wisconsin Statutes; Art. 13, §11, Wisconsin Constitution], otherwise— Consistent with the statutes administered by the Ethics Board, a person who is a state public official solely because of membership on a state board, council, committee, or the like <i>may accept and retain</i> : a. Items and services unrelated to public position and not provided by a lobbyist or lobbying organization. Food, drink, transportation, lodging, items, and services furnished by neither a lobbyist nor an organization that employs a lobbyist and which the recipient can clearly demonstrate are received for a reason unrelated to the recipient's holding or having held <i>any</i> public position [§§ 19.45(3m) and 19.56(3)(b), <i>Wisconsin Statutes</i>] and which could not reasonably be expected to influence an official's vote, official actions or judgment, nor reasonably be considered a reward for any official action or inaction; b. Salary from a lobbying organization. Payments and benefits from an employer, even if the employer retains a lobbyist, if in an amount the employer customarily provides to similarly situated employees and the individual receives no compensation for service as a state public official apart from a per diem or reimbursement of expenses [§13.625(2)]; c. Expenses for talks and programs. Payment or reimbursement by a meeting's sponsor of expenses an official incurs for	Guidelines maintained by the Wisconsin Ethics Board

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		<p>presenting a talk or program about state issues (including meal and travel costs) [§ 19.56(3)(a)];</p> <p>d. Expenses provided by or to the state. Food, drink, transportation, lodging, or payment or reimbursement of costs that the official can clearly and convincingly demonstrate are provided by or for the state and for the state's benefit, not for a private benefit</p> <p>Except as noted above, a member of a state board, council, committee, or the like <i>should not accept</i>:</p> <ol style="list-style-type: none"> 1. Items or services offered because of state position. Any item or service of more than nominal value offered because of the person's holding a state public office [§ 19.45(2), <i>Wisconsin Statutes</i>]; 2. Food, drink, or travel offered for a reason related to holding any public position. Food, drink, transportation, or lodging except when the recipient can clearly and convincingly demonstrate that the items are offered for a reason unrelated to the recipient's holding or having held <i>any</i> public position [§§ 19.45(3m) and 19.56(3)(b)]; 3. Items or services from lobbyists. Food, drink, transportation, lodging, employment, or thing of pecuniary value from a lobbyist†, either directly or through an agent [§ 13.625(1)-(3)]; 4. Items or services from organizations that employ lobbyists. Food, drink, transportation, lodging, or thing of pecuniary value from an organization that employs a lobbyist except (i) items and services also made available to the general public on like terms and conditions and (ii), if the individual receives no compensation for service as a state public official apart from a per diem or reimbursement of expenses, payments and benefits from an employer in an amount the employer customarily provides to similarly situated employees [§ 13.625(2)];‡ and 5. Transportation, traveling accommodations, or communication services. Transportation or traveling accommodation for which the supplier would usually charge [§946.11; Art. 13, §11, Const.]. 	
WV	West Virginia Consolidated PRB	<p>West Virginia CPRB Trustees are governed by the state Ethics Act. Gifts and meals are limited to de minimis (\$25.00). Trustees and senior management are required to complete and submit an annual Ethics Disclosure reflecting the details about any gifts and meals, income from any source over \$1,000, investments etc.</p>	WV state ethics act WV Code §6B-1-1 et seq