



HAWAII STATE ETHICS COMMISSION

State of Hawaii • Bishop Square, 1001 Bishop Street, ASB Tower 970 • Honolulu, Hawaii 96813

ETHICS ADVISORY 2013-06

MACY'S BELIEVE PROMOTION

December 5, 2013

The State Ethics Commission has learned that a number of Department of Education (DOE) teachers and administrators have been asked to support and to encourage students to participate in Macy's "A Million Reasons to Believe" promotion ("Macy's Believe Promotion"). For each letter to Santa that is deposited in the Santa Mail letterbox located at Macy's stores, Macy's will donate \$1 to the Make-A-Wish Foundation, a non-profit organization that grants wishes of children with life-threatening medical conditions.

The State Ethics Code prohibits state employees from using work time and state resources for non-state related business purposes, which generally includes supporting or promoting private charities. More specifically, with certain limited exceptions, state law does not allow a state employee to fundraise for or to otherwise solicit support of a private charity, such as the Make-A-Wish Foundation, during work or using state resources. That means public school teachers and other DOE employees cannot send emails asking others to participate in Macy's Believe Promotion using their school computers or through the state email system; they cannot use school printers or copiers to reproduce the Santa letter template; they cannot use classroom time to encourage students to write letters to Santa in support of the Macy's Believe Promotion; and they cannot use school facilities to receive or collect the letters to Santa.

The Commission has addressed the use of state resources to support the Macy's Believe Promotion directly with the DOE employees who were encouraging others to participate in the promotion. The Commission issues this Ethics Advisory to inform all state employees, including other DOE teachers and administrators, that the State Ethics Code, generally, prohibits employees from using state resources for private fundraising and other activities in support of charities. If a state employee is considering fundraising activities using state resources, the Commission strongly recommends that the employee consult with Commission staff before engaging in those activities.