

ETHICS COMMISSION CITY AND COUNTY OF SAN FRANCISCO

PETER KEANE CHAIRPERSON Date: May 17, 2017

To:

Subject:

Members of the Ethics Commission

Daina Chiu Vice-Chairperson

From: Pat Petersen, Education & Compliance Officer

Gayathri Thaikkendiyil, Executive Fellow

PAUL A. RENNE COMMISSIONER

AGENDA ITEM 4 - Report on April 2017 Annual Filing Process for Statement of

Economic Interests (Form 700)

QUENTIN L. KOPP COMMISSIONER

VACANT

COMMISSIONER

LEEANN PELHAM
EXECUTIVE DIRECTOR

Summary: This report highlights programmatic information and operational updates

regarding the 2017 Annual Statement of Economic Interests (Form 700)

Action Requested: No action is required by the Commission as this item is for informational

purposes only.

Introduction

This report provides detailed information about the status of Annual Form 700 filing process, including initiatives undertaken by the Ethics Commission this year to assist filers in complying with the filing requirements. It also provides information from a survey conducted to elicit feedback from filers and filing officers regarding the annual filing process to identify areas of improvements to enhance the program.

The deadline for City officers and designated employees to file the Annual Statement of Economic Interests (Form 700) was Monday, April 3, 2017. Elected Officials, Commissioners, Board Members and Department Heads are required to file the Form 700 electronically with the Ethics Commission while the designated employees are required to file paper copies with their respective departments. Each year filers submit the annual Form 700 in April to disclose their reportable financial interests for the period of January 1st to December 31st from the previous year.

Annual Filing Status

This year 505 individuals were required to file their Form 700 statements electronically with the Ethics Commission, and as of May 17, 2017, 97 percent of e-filers had filed their Annual Form 700 through the Commission's online filing system. In March, the Commission also launched a new function to enable these e-filers to submit their Sunshine Ordinance

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Declarations and Certificate of Ethics training online. About 215 filers have electronically filed the annual Sunshine Ordinance Declarations which were also due on April 3, 2017. In addition, over 3,000 filers who are designated filers submitted paper Form 700 filings with their departmental filing officers.

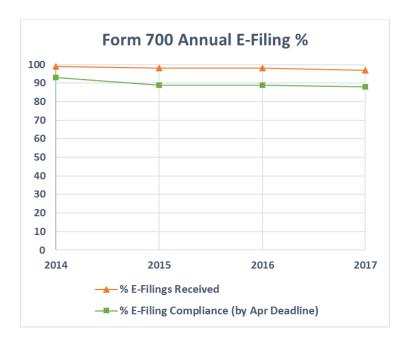
E-Filing History and Trends

The table below provides a historic view of the filing compliance percentages for electronic filers (Elected Officials, Commissioners, Board Members and Department Heads) from 2014, since the launch of the electronic filing process, to current year (as of 05/17/17). As can be seen from the data and **Chart 1**, the on-time compliance and overall filings received in 2017 are 88 percent and 97 percent, respectively. With on-time compliance rates declining somewhat over the last four years, a key program target is to help filers achieve full on-time compliance as much as we can through continuous evaluation of our program operations and enhanced compliance assistance.

Table 1: E-Filing History

Year	Number Of E-Filers	E-Filing Compliance (by April Deadline)	E-Filings Received (Overall)
2014	507	93%	99%
2015	488	89%	98%
2016	489	89%	98%
2017	505	88%	97%

Chart 1: Minding the Gap: On-time E-Filings v. Overall E-Filings Received



One of the benefits of the electronic filing process is that it enables better program monitoring and evaluation with the help of data that is readily available in the system. The appendix includes two examples of charts that were created using the filing data. **Chart 2** represents the e-filing trend observed during the annual filing period which shows that majority of the filing activity occurred within two weeks prior to the deadline, with most filings completed on the day of the deadline. This type of information can help the program staff more effectively allocate resources to support filers during the filing period. We can also pull summary level information from the filing data to understand general characteristics of filers to inform outreach efforts. **Chart 3** shows that 65 percent of the e-filings received included one or more disclosure schedules. This type of information can help better understand and support the information and training needs of filers.

Late Filers and Non-Filers

On May 5, 2017, letters were mailed and e-mails were sent to non-filers and late filers who were required to file 2017 Annual Form 700. Several late filers have responded by paying the late fee they incurred. Staff will continue to communicate with late-filers regarding any appropriate waivers of late fees. Any remaining late-filers will receive a second letter and e-mail in early June, reminding them of their obligation to pay their late fee. If a filer fails to respond to the second round of communications regarding late filing fees, the filer will be referred automatically to the Enforcement Division of the Ethics Commission.

In early June, a second letter and e-mail will be sent to each of the remaining non-filers. Those who fail to file after receipt of the second non-filer notice will be referred automatically to the California Fair Political Practices Commission for enforcement.

Outreach Initiatives

The following sections outline the various outreach initiatives undertaken by the Ethics Commission to support filers and departments during the annual Form 700 filing process.

Online Tools

In February, the Ethics Commission launched a new homepage banner and a landing page on the website to help Form 700 filers and filing officers quickly find the information they need regarding the annual filing requirements. The banner helped remind website visitors about the annual filing deadline, and directed them to a landing page that presented relevant information and resources in one centralized location. From the Form 700 landing page, visitors could learn why the Form 700 is important for ensuring transparency among City officers, access filing resources and tools, understand how to comply with filing requirements, and learn about late filings and enforcement. As a part of this launch, other sections of the website that provide information about Form 700 were also redesigned to improve the content and usability. After the April 3rd annual filing deadline, the homepage banner was updated to link to Form 700 disclosures landing page which provides information for general public regarding how to access this year's Form 700 filings in various formats such as statements and datasets. Screenshots of the homepage and landing pages referenced in this section are included in the appendix (Images 1 through 4).

As we continue to gather and assess feedback on our new website, understanding the information needs of our web users will help us continue to shape the most useful content for our education and compliance notices and guidance going forward.

Information Sessions

To help heighten awareness of the annual filing requirements and support full and timely compliance, Commission staff held information sessions for filing officers and filers. Filing officer information sessions were designed to provide details about the annual filing requirements and filing officers' duties to help support departmental compliance. New this year were the filer information sessions which were designed to provide filers with details regarding the annual filing requirements, filing process, and general reminders about each schedule in the Form 700. Presentations from the Filer Information Sessions and Filing Officer Information Sessions were shared with all filers and filing officers, and they were also posted on our website for wider availability. Based on the questions from the attendees during the filer information sessions we also circulated a follow-up "FAQ" for filers to answer a series of commonly asked questions. Responses from filers and filing officers to post-session surveys about the trainings, and other follow-on conversations with attendees, were positive. Table 2 provides details about the number of sessions held and the participation.

Table 2: 2017 Annual Form 700 Filing Information Sessions Held

Information Sessions	Number of Sessions	Participation
Filer Sessions	3	50
Filing Officer Sessions	2	38

Filing Support

In addition to online tools and information sessions, Staff also sent out several email reminders to departmental contacts during February and March with information about filing resources and assistance for filers and filing officers, and including Department Heads. Program staff also provided one-on-one assistance to filers and filing officers through emails, calls, and in person.

Feedback from Filers and Filing Officers

This year we created online surveys to gather feedback from filers and filing officers regarding the annual filing process to help identify areas of improvements for the program. The filer survey was sent out during the week of the annual filing deadline to the departmental filing officers, to be shared with filers. The filing officer survey was sent out during third week of April. The sections below summarize observations from the survey responses. The survey questions, response charts, and feedback comments from both surveys are detailed in the appendix.

Filer Survey

E-filers and designated filers were requested to provide feedback through an online survey link which was circulated by the departmental filing officers. As shown in **Charts 4.a through 4.f** in the appendix, we received 138 responses to the survey of which 85 percent were paper filers and 87 percent were previous filers. About 36 percent of the total responders expressed average filing experience and over 50 percent expressed positive filing experience. Filers also shared the type of resources they used during the filing process which shows departmental filing officers and Ethics Commission website as the top two responses.

Filing Officer Survey

Filing officers were requested to provide feedback through an online survey link. As shown in **Charts 5.a through 5.e** in the appendix, we received 20 responses to the survey of which 80 percent of the responders were designated as their department's filing officers and 65 percent supported both electronic and paper filers. Roughly 90 percent of the responders had performed the filing officer duties before and most responders indicated a positive experience with this year's filing process. Filing officers also shared the type of resources they used to fulfill their duties, which shows Ethics Commission staff and website as the top two responses.

Observations and Opportunities

We have captured a few common themes and observations that have emerged from the feedback comments in the survey responses. We have also identified opportunities for improving the program to address some of the questions and comments. **Table 3** below provides the summary of the key observations and learnings. The full list of comments from both surveys are available in the appendix.

Table 3: Feedback Survey Observations and Opportunities

Program Area	Observations	Opportunities
Filing Guidance and Education	 Many filers indicated that they were not sure why Form 700 disclosure was required and why specific roles had to file the form. A few also suggested that the designated filers be required to file the form only if they had any reportable interests. Several filers expressed challenges in understanding the form and commented about confusion in determining whether particular financial interests were considered required or optional. They asked for more examples, scenarios, and explanations to assist them in completing the form. A few new filers commented that they did not receive sufficient guidance during onboarding process or when a position was reclassified to require Form 700 disclosure. Many filers indicated that the filing process was simple or that they did not encounter any issues. 	 Raise more awareness among departments about topics such as the purpose of the Form 700, conflicts of interests, disclosure categories etc. to ensure that departments and filers are not under-reporting or over-reporting. Create more in-depth and engaging online tools and training materials to help provide clarity regarding specific scenarios and common reporting requirements. Pro-actively engage with city departments to incorporate information about Form 700 filing requirements in their onboarding process. Provide reminders and assistance to departmental filing officers to ensure timely notification to new filers.
Outreach and Filer Support	 Filers indicated positive as well as negative experiences regarding the support from staff Filing officers indicated positive feedback regarding support from staff, information sessions, and program's online efforts Both sets of responders have suggested additional filing assistance through online tutorials, phone support, information sessions, and inperson support 	 Create web-based guides and online trainings that filers can access at their convenience Provide filer information sessions throughout the year to cover assuming, leaving, and annual filers' needs Provide extended phone support (beyond regular office hours) closer to the annual filing deadline Allocate more staff resources for one-on-one filer support during the peak filing period

Technology 1. A couple of filers experienced issues 1. Provide additional instructions with e-filing system password reset online and to departmental contacts regarding how to address common process 2. Many filers expressed interest in the etechnical issues, including password filing option for Form 700 reset process 3. A couple of filing officers mentioned 2. Expand e-filing to designated filers about current e-filers who did not own to help simplify their filing a computer or was finding it hard to file experience and reduce the amount the form electronically of paper work handled by the departmental filing officers 3. Continuously improve the e-filing system to simplify the process for all filers 4. Provide one-on-one filing assistance in office for filers who do not own computers **Ethics and** 1. A couple of respondents indicated that 1. Continuously improve the online Sunshine the training video was long and one training and e-filing process to the Training responder experienced technical issues resolve issues experienced by users while accessing the video. 2. A couple of filing officers appreciated the new e-filing option for Sunshine and Ethics training. One of them suggested using the same deadline for both Ethics and Sunshine training.

As we prepare to move toward e-filing for all Form 700 filers, these observations and learnings will help us provide better filing support for all filers.

We look forward to answering any questions you might have at the upcoming Commission meeting.

APPENDIX

Chart 2: 2017 E-Filing TrendNo. of filings received vs. No. of days from April 3rd deadline

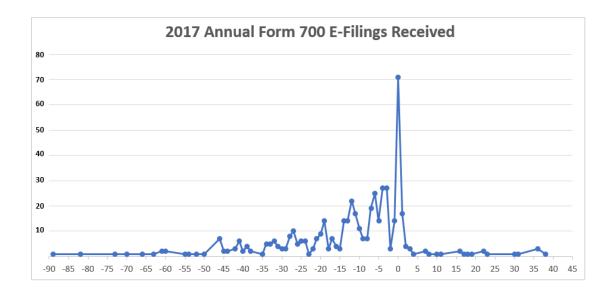


Chart 3: E-Filings with Disclosure Schedules 65% of E-filers reported some economic interests

2017 Annual Form 700 E-Filings

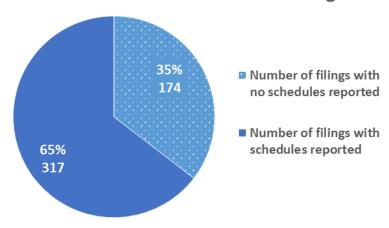


Image 1: 2017 Annual Form 700 Filing Reminder - Homepage Banner



Image 2: Landing Page with Resources for Filers and Filing Officers

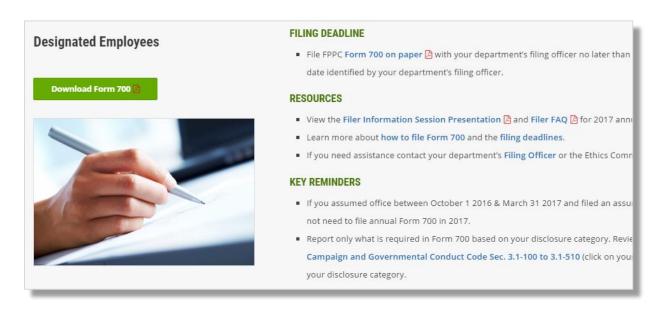


Image 3: Form 700 Disclosures – Homepage Banner

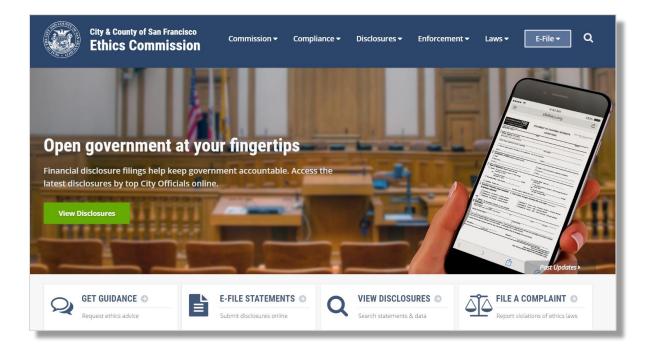
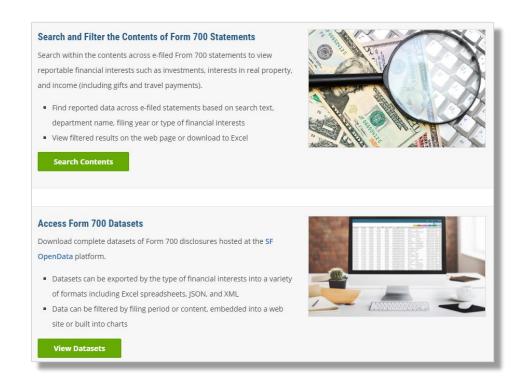


Image 4: Landing Page with Tools for Public to Access Form 700 Disclosures



2017 Annual Form 700: Filer Feedback Survey

E-filers and paper filers were requested to provide feedback through an online survey link.

Survey Questions

- 1. Name (Optional)
- 2. Email (Optional)
- 3. Are you a first-time Form 700 filer?
 - Yes
 - No
- 4. How did you file your Form 700?
 - Electronic filing with the Ethics Commission
 - Paper filing with the Departmental Filing Officer
- 5. What kinds of assistance or resources did you use in filing Form 700? (Select all that apply)
 - Departmental Filing Officer
 - Ethics Commission Staff
 - Ethics Commission Information Sessions
 - Ethics Commission Website
 - Fair Political Practices Commission (FPPC) Website
 - Other
- 6. How would you rate your overall filing experience?
 - Scale of 1 (very poor) to 5 (very good)
- 7. Please share any comments regarding your filing experience.
- 8. Do you have any suggestions to help improve the filing experience?
- 9. Are there any Form 700 related topics or questions that you would like more information on?

2017 Annual Form 700: Filer Feedback Survey Responses

(138 Responses)

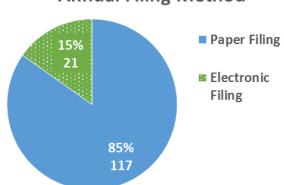
Chart 4.a: Filing Method

Most survey responders were paper filers

Chart 4.b: First Time Filer

Most survey responders had filed before

Annual Filing Method



First Time Form 700 Filer

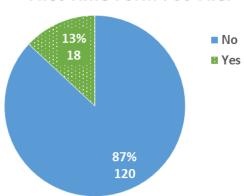


Chart 4.c: Filing Experience

Responses overall indicate a positive experience

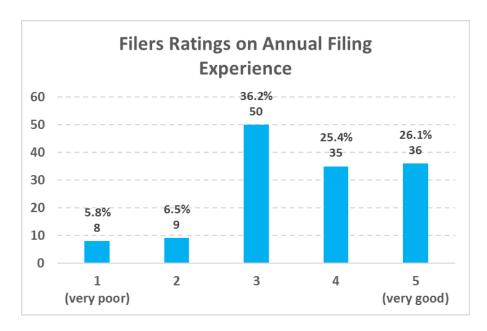


Chart 4.d: Paper Filers - Filing Experience

85% of the responders indicated ratings that were average or above

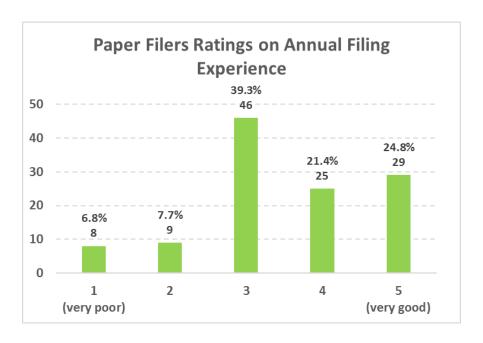


Chart 4.e: Electronic Filers - Filing Experience

All responders indicated ratings that were average or above

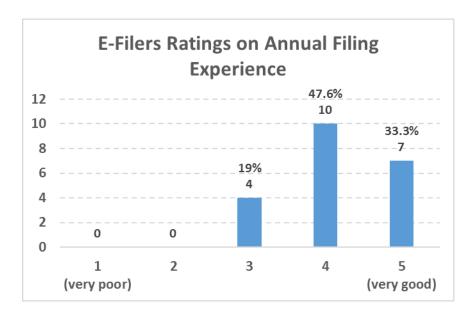
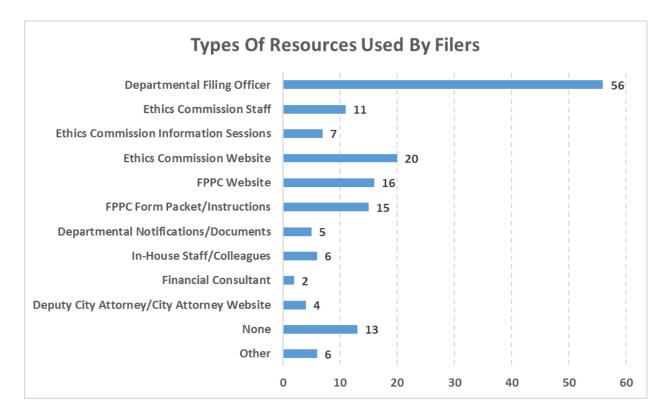


Chart 4.f: Filing ResourcesFilers indicated Departmental Filing Officer and Commission Website as the top two responses



Comments from Responders

(categorized under common themes)

Survey Question: Please share any comments regarding your filing experience.

General/Positive Comments

simple.

My Form 700 is very simple, so I cannot speak to the experience of anyone who has any interests to report.

Glad that the prior filings are on file so that updating is quick and easy.

Electronic filing is really easy.

It is easy. Perhaps, it is because I don't have much to report.

Painless as usual.

it's fine

Good, as my department staff entered most of the information prior to hand the form to me.

Although I submitted a paper document, I filled it out on line. No issues.

The form I used was fillable online, but a printed form was required for file retention purposes. Limiting the scope of relevant reporting required, from very broad to more narrowly defined, was helpful.

My filing experience went well. As a filer, I appreciated the informational sessions that the Ethics Commission provided. And, as a filing officer, I thought that the office was extremely accessible in helping those officials who needed to e-file. The only hiccup that occurred from my perspective is when the announcement came out that e-filing Sunshine Ordinances was available it created a bit of confusion for officials from my department that were filing because they didn't know if this was A) a requirement (to e-file rather than paper file) and B) they had already submitted paper declarations. I wish this would have been perhaps announced earlier with the original filing notices, but I do understand if this new opportunity wasn't completed until after.

I have just been redoing the same thing I have done in the past as I have no reportable interests.

I would like to be able to file electronically

Electronic filing would be better

seems like we should be able to do electronic submissions

Any way to file electronically?

Sometimes we need to do these for more than one agency/ commission we sit on. If it was available electronically to those agencies once it was done it could be accessed by them instead of us having to send it to them

information was easily accessible

I have been filing the form annually for 6 years now. It has always been straightforward and simple to file.

Simple, especially since I had copies of previous year filings to help me remember things like the department code.

The process is straightforward.

It was easy and painless

Very efficient and easy to use interface.

why not just state "work address" instead of address ??

Comments About Technical Issues

I had problems w/ my password, Ethics IT very helpful in resolving it.

We use a PDF form to be filled out on the computer, but the form does not easily accommodate multiple pages when needed

MY RATING OF GOOD IS DUE TO ON PHONE COACHING WITH A NICE STAFF PERSON,, OTHER WISE A VERY BAD EXPERIENCE. THE SITE WOULD NOT ACCEPT MY PASSWORD EVEN AFTER GETTING A NEW ONE THROUGH THE SUGGESTED PROMPT. CALLED IN TO GET HELP.

Comments About Understanding Requirements

TEDIOUS AND UNCLEAR

The form is confusing.

form is unnecessarily complicated, confusing directions

confusing, only knew what the form was for and why CCSF asks for it because I worked for GSA HR

Difficult to figure out what information is required vs optional

The directions... are not user friendly.

Descriptions at times confusing. Especially for those who have no assets but have a retirement plan where the money is invested.

no one really has any clue what this form is, how to do it, or if retirement accounts are included I suspect many are not following instructions re: disclosing spousal interests due to confusion regarding requirements.

Why I only need to file this with the TTX, and not the MTA, PUC or Planning?

Comments About Filing Support

I asked for assistance from the City Ethics staff. It was apparent they didn't read my email, referred me to the website, and then told me to do the best I can and they could get back to me after the deadline. My colleagues were more helpful.

Seemed overly intrusive and staff was not helpful when asked if i needed to file.

Comments About Filing Need

unless something changes it is redundant

I do not feel it is necessary for Clerical Support to fill out 700 forms.

not sure why rank and file law enforcement officers need to fill this out?

I dread & hate it every year. It's like a slightly less awful version of filing a tax return. Why is it necessary? Why can the Form 700 agency (whatever that is) not simply get this information from our tax returns, our HR department, etc.? Resent it, find it time consuming, annoying, and all things bad.

Filing is this form seems completely unnecessary due to my authority level.

This is an inconvenience, with not only the requirement but several email reminders and notices each year, especially as I do not have any interests to declare. The default should be that you do not file unless you have something to declare.

Who are the people that this form is actually necessary for? I work for the government, on a government salary. I would love to be able to afford a house, but I don't own one and can't afford one. I would love to have actual investments, but with student loans in an amount greater than the cost of my mom's mortgage, that's pretty much an impossibility as well.

Comments About First-time Filing

I have been in my classification for 6 years and have never had to file the form. I should have been notified by my department that there was a change/addition in list of classifications required to file this year. I did not appreciate receiving an internal email that "I was late in filing"

Did not receive sufficient guidance when I on-boarded re filing requirement.

I was confused in my situation. I was hired end of August 2016, so I wasn't sure if I needed to file or not. Request to see my copy of Form 700, and decided to file again for 2016 because my original filing seemed inaccurate after reviewing current instructions. I don't remember receiving full instruction when I was hired.

Comments About Training Video

video is too long

My work computer would not run some of the media so I used my own

The video was long and in my case very little applied to me. It was tedious and difficult to sift through large amount of very dry legal information to find rules that apply to me.

Survey Question: Do you have any suggestions to help improve the filing experience?

Comments About Electronic Filing

Make it digital.

Electronic filing would be better

save the data for next year and let it fill in. then, we add to it.

Please retain copies in electronic form.

Death to paper! Let's go 100% electronic

All forms should be filed electronically only in the future.

supply the previous year filing and copy to resubmit

Create an on-line version that is savable year-year and can expand to intake all required entries

I had no idea there was an electronic option. I would like more advertising on that filing option next year.

Continue to ensure that our online submission process is available, that would save a lot of time and resources.

PEOPLE WHO ARE REPEAT FILLER SHOULD BE ALLOWED TO CHECK A NO CHANGES BLOCK WITH AN EASIER LOG ON SYSTEM.

Comments About Filing Need

Only ask employees to file if they have anything to declare

perhaps only filing IF you have something to "claim"

Make it a requirement only if you have interests to declare.

Eliminate it for Clerical

this form should be only for elected officials, CEA's, etc. not line peace officers

I think we should reduce the number of positions required to complete these forms as most must seek approval from a manager and/or supervisor and do not have the authority to enact a conflict.

Comments About First-time Filing

Departmental officer should keep track of when Form 700 due for new employees.

Yes, the email to staff who experience a change from previous years filings should be notified in advance identifying the specific classification who is required to file. Attaching a list of classifications was not helpful. I normally receive all notices on Form 700 filings because I support the Department Head and am responsible for tracking that filing deadlines are made timely by her. Therefore, I ignore the reminders.

Comments About Filing Support

ONLINE TUTORIAL TO COMPLETE OR PASS EACH SECTION

May have a contact person or hotline telephone number for any questions.

Yes, get rid of it. Form 700 agency should find a way to gather this information on their own time OR they should come to us and go through it with us, face to face, each person one at a time, and do it for us.

Comments About Understanding Requirements

use positive examples..., and not good examples.... B

clarify which classifications are subject to spousal disclosure

explain why its needed, what needs to be filled out and how often (I never filled this out with GSA HR).

More scenario examples and clarity on when a spouses property etc is considered my own interest. make "work address" in bold and extra large font.

Write instructions and form so you do not need a legal degree or need to be an accountant to understand what is being asked.

Less written wordings for instruction. Bullet point or clean short instructions. Too many wordings create an clutter image and makes it seem intimidating.

explanation, including very clearly stating that retirement accounts are not included

clear directions including what to skip and what to complete

complicated if you have to ask someone at your credit union as to whether investments in brokerage account qualify as meeting definition of "reportable investments"

Make it less of an aggressive reminder of how little I have, how little I make, how much debt I have, and how remote the possibility of actually owning a house is.

Comments About Training Video

shorter videos

The sunshine act has very, very little to do with what an Electrical Inspector does. I think that a 10 minute video would be sufficient to just cover topics pertaining to specific disciplines (In 18 years, I have never held a public meeting and most likely never will). Seems most of the video is about meetings and it is difficult to watch something for an hour for the small tidbit of information that I need for what I do.

Next year, it would be great to know if e-filing Sunshine Declarations is a requirement for those that are required to e-file their Form 700's. It may be easier for filing officers if they are just required to e-file both documents.

Survey Question: Are there any Form 700 related topics or questions that you would you like more information on?

Will SF Open Data reports cover such forms that are subject to PRA?

No. Would like to be able to have State Employee trainings and County trainings have reciprocity so that government employees who are appointees to boards do not have to undergo duplicate training.

Yes, this year I emailed all Disclosure Category 2 filers scanned Form 700's to the Ethics Commission. It would be great to know if this is mandatory. I emailed these over because I wasn't clear from the filing sessions if the Ethics Commission needed copies of any paper filings. Can you please let me know if this is the case so I can better prepare for next year?

define the key words in "explain, the purpose...Thanks

Exactly which positions are legally required to complete this form and why? Which positions does the state require to report this type of information?

would also be helpful if we could file electronically

More clarity for people with minimal to no assets.

No, I want it to stop existing.

Again, who are the people that this form is actually necessary for?

2017 Annual Form 700: Filing Officer Feedback Survey

Filing officers were requested to provide feedback through an online survey link.

Survey Questions

- 1. Name (Optional)
- 2. Email (Optional)
- 3. Please indicate your role in supporting your department's 2017 Form 700 annual filing process.
 - I am designated as my department's filing officer
 - I have been delegated the day-to-day responsibilities of the filing officer
- 4. Is this the first year that you have performed these duties?
 - Yes
 - No
- 5. Please indicate the filing method the filers you supported used to submit their Form 700s:
 - E-filing with the Ethics Commission
 - Paper filings that are filed with my department
 - Roth
- 6. What kinds of resources did you use in performing the filing officer duties? (select all that apply)
 - Ethics Commission Staff
 - Ethics Commission Information Sessions
 - Ethics Commission Website
 - City Attorney assigned to your department
 - City Attorney assigned to the Ethics Commission
 - Fair Political Practices Commission (FPPC) Website
 - Other
- 7. How would you rate this year's annual filing process?
 - Scale of 1 (very poor) to 5 (very good)
- 8. Please share any comments regarding your experience.
- 9. Do you have any suggestions to help improve the filing process?
- 10. Are there any Form 700 related topics or questions that you would like more information on?

2017 Annual Form 700: Filing Officer Feedback Survey Responses (20 Responses)

Chart 5.a: Filing Officer Role

Most responders were designated filing officers

Chart 5.b: First Year in the Role

Most responders had performed the duties before

Process Designated as department's filing officer Delegated the day-to-day responsibilities of the filing officer 80% 16

First Year Performing Filing Officer Duties

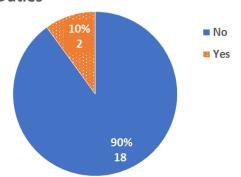


Chart 5.c: Filing Methods Supported

Most responders supported paper and electronic filers

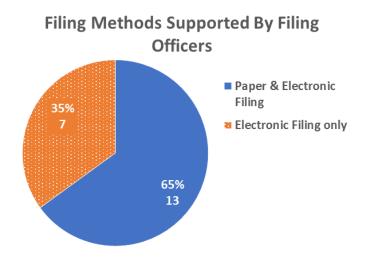


Chart 5.d: Annual Filing Experience

Most responders had a positive experience

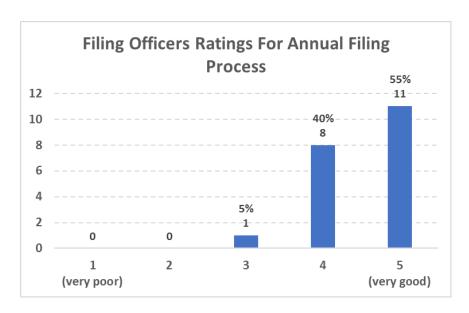


Chart 5.e: Filing Officers Resources

Responders indicated Ethics Commission staff and website as the top two responses



Comments from Responders

Survey Question: Please share any comments regarding your experience.

Much better. Staff didn't seem so confused

seemed about the same as last year

I still have Trustees that do not own computers and have their children or staff filing on their behalf.

The workers at the Ethics Commission were so helpful and patient! They made this whole process easier.

Working with Ethics staff was great - as always. Always looking to resolve issues and very patient. I appreciate them

Thank you for allowing filers to efile their Sunshine Forms

Patricia Petersen unconditionally assists me with any questions. Thanks again Patricia.

Ethics Commission staff have always been very responsive and helpful.

Some commissioners indicated it was very hard for them to file the forms electronically. They requested the help from Ethics Commission staff or from HSA executive assistant.

I liked that the Ethics Commission set up info sessions for filers. I don't know if any of our filers took advantage of such sessions but I, personally, thought it was a great idea. Thank you.

I think your efforts to stream line and make more of the process online is great.

Survey Question: Do you have any suggestions to help improve the filing process?

Not sure how the electronic filing system works, but since we got these comments from commissioners, maybe it should be done much simpler.

It was difficult the first couple of years to understand the process (especially the first year). The information sessions have helped. Maybe, "beginner" sessions would help? Or an on-line training program for "newbie" Filing Officers (especially as it pertains to rules regarding new hires and new appointees)? Also, while I understand that it is not possible right now to "time" the Ethics Declarations to also be due on April 1, that would really help.

Permit paper copy filings in extreme need situations.