



ETHICS COMMISSION CITY AND COUNTY OF SAN FRANCISCO

Enforcement Division FY22 Training Program Plan

Updated March 2022

Mission

The mission of the Ethics Commission is to practice and promote the highest standards of integrity in government. We achieve that by delivering impactful programs that promote fair, transparent, and accountable governmental decision making for the benefit of all San Franciscans. Because public service should be carried out in a way that builds and preserves public trust, our aim is to ensure that San Franciscans can have confidence that the operations of the City and County and the decisions made by its officials and employees are fair and just and are made without any regard to private or personal gain.

Principles that help guide the Commission's investigative and enforcement work include effectively identifying, investigating, and remedying unlawful conduct under the jurisdiction of the Commission; achieving fair, thorough, and timely case resolution; and striving for continuous operational improvement, flexibility, and transparency. These principles support the Commission's overall mission by helping to ensure accountability for violations of law and thereby preventing future violations.

I. Goals

The training program seeks to ensure that investigators regularly access timely and relevant information to help develop their knowledge, skills, and organizational processes that will deepen and reinforce the work of the Enforcement Division. The training content should be tailored to the existing skills and needs of the investigators and the current operational needs and caseload of the Division.

Because formal training opportunities are not generally available for the kind of work performed by Commission investigators, the program seeks to leverage existing expertise within the Division and relationships with peer agencies to capitalize on knowledge and skill sharing opportunities. This approach has the added benefit of deepening collaboration between investigators and strengthening interagency communication and collaboration.

This program will serve as a basis to build shared Division-wide knowledge and skills, which is of particular importance as the Division expands and during the period of new Division leadership.

II. Methods

Regular Assessment

- The first step in determining the forms and topics for training sessions is for the Director of Enforcement to regularly engage with investigators in an assessment of their skills and knowledge. Through ongoing

collaboration on cases and regular review of investigators' cases and work product, the Director of Enforcement works with investigators to identify areas for knowledge and skill development.

Ethics Commission Knowledge Transfer Opportunities

- The Commission engages in significant substantive knowledge transfer with new hires. This involves planned onboarding sessions to train new hires in the substance of the laws and programs administered by the Commission. The basic format of these knowledge transfer sessions has proved effective, with longer-tenured staff developing content to educate newer staff through interactive training sessions, including knowledge implementation exercises, assessment, and planned follow-up opportunities.
- This form of knowledge transfer will be expanded within the Enforcement Division to ensure that both new hires and longer-tenured investigators are able to access ongoing educational opportunities to continuously build and refine their knowledge of the Commission's laws and programs. This knowledge transfer will leverage the existing specializations and expertise of investigators to ensure that knowledge diffuses throughout the Division, including knowledge of whistleblower retaliation laws.

Ethics Commission Skills Training Opportunities

- The Commission's investigators have extensive experience in investigations, administrative enforcement, criminal law enforcement, financial and agency auditing, business law and administration, policy analysis and development, and other related disciplines. This expertise varies by investigator depending on each investigator's professional history.
- This wealth of internal skills creates an opportunity to design and conduct regular skills development sessions that leverage existing skills within the Division to study, discuss, and build these skills in all investigators.
- Additionally, relevant professional skills possessed by Commissioners should be leveraged for skills training sessions insofar as Commissioners are willing and available.
- This form of training will help ensure that important skills held by investigators diffuse throughout the Division. It is also an opportunity for longer-tenured investigators to share skills with newer investigators and for investigators with skills gained through prior professional experiences to share those skills with others.

External Agency Skills Training Opportunities

- Ethics agencies in other jurisdictions constitute additional sources of valuable investigative skills that are highly relevant and applicable to the work of the Division. Skills training sessions will be arranged where possible with investigators from other ethics agencies so that Division investigators can learn from the experiences of other enforcement divisions, especially regarding particularly important cases or novel or effective investigative techniques.
- Investigators in other agencies that are not ethics-specific agencies are another source of potential skills training that will be explored. These could include prosecutors or investigators in agencies that investigate white collar crime or other violations that are similar in nature to the violations investigated by the Commission. Training in any special skills involved in investigating whistleblower retaliation cases will be sought out.

City-Provided Trainings

- Where appropriate, the Division will also make use of available trainings provided by other City departments about City systems and tools that will support the Division's work. These may include trainings by DataSF on using the City's open data portal to perform data analysis or the Controller's office on City systems such as the financial and HR systems.

- Additionally, depending on position classification, Commission Staff currently undergo a number of mandatory trainings conducted by other City departments, including Whistleblower Program training, harassment prevention, cyber security, and bystander training.

III. Indicators of Progress

- On no less than a semiannual basis, the Director of Enforcement will have the opportunity to meet with investigators to assess the effectiveness of recent trainings and to revise training goals or plans in the coming year as appropriate.
- The Director of Enforcement will continually work with investigators to ensure that investigators are actually learning the skills and knowledge involved in the Division's work and using them to deepen their effectiveness on more complex cases and to resolve cases more efficiently.
- No less than annually, the Director of Enforcement will have the opportunity to check in with primary peer agencies to compare investigative and/or training practices and identify opportunities for inter-agency skills training opportunities.