San Francisco Ethics Commission

May 9, 2022

To: Members of the Ethics Commission

From: Rachel Gage, Engagement and Compliance Manager

Subject: Agenda Item 8 – Statement of Economic Interests (Form 700) E-Filing Expansion Project
            Implementation Report

Summary and Action Requested

This presentation provides an implementation report on the Form 700 E-Filing Expansion Project. It includes an update on the April 1, 2022 annual Form 700 filing deadline and information on how to view the publicly-available disclosure statements and data through the Commission's website. No action is required by the Commission, as this item is for informational purposes only.

Background

Public officials and employees who make or influence government decisions are required under California law to file a Statement of Economic Interests, or Form 700, to publicly identify the kinds of financial interests that could be affected by their governmental duties. These public disclosure filings serve as a tool to help us detect and avoid potential conflicts of interests and promote public confidence that actions on governmental decisions are made without any regard to personal gain.

Effective January 1, 2022, employees and consultants occupying designated positions identified in Sections 3.1-103(d) and 3.1-108 of the City's Conflict of Interest Code ("designated filers") are required to file their Form 700 statements in electronic format using the Ethics Commission's NetFile e-filing system, which is the same online system that has been used by department heads, elected officials, and board and commission members to file their statements since 2014. As with filings by City officials, redacted Form 700 filings by the City's designated filers submitted after December 31, 2021, will be available online to the public immediately after they are submitted. The former paper-based filing process was eliminated, making it easier for filers to submit filings online, increase filing efficiency for departments, and improve public access to reportable information once the filer's disclosure statement is submitted.

Annual Statements of Economic Interest (Form 700) filings by City officials and designated filers were due by Friday, April 1, 2022. These Form 700 filings cover the period January 1, 2021 through December 31, 2021. As of the filing deadline, 91 percent of City officials – including 100 percent of City elective officers currently in office with an April 1 filing deadline – submitted their Form 700 filings on time. In addition, over 92 percent of the 4,700+ City employees and consultants – who were required to file electronically beginning this year using the Ethics Commission's online filing system – submitted their Form 700 filings by the April 1 deadline.

Staff Presentation

Staff has prepared the attached visual presentation and plan to provide a brief overview of its contents at the Commission's meeting on May 13 and will be available to answer any questions from Commissioners.

City & County of San Francisco
Ethics Commission

Statement of Economic Interests

FORM 700 E-FILING EXPANSION PROJECT

Implementation Report
May 13, 2022

Rachel Gage
Project Manager
Ethics Commission Engagement & Compliance Manager

Statement of Economic Interests
Form 700 E-filing Expansion Project

Implementation Report

- Go Live! Update on April 2022 Annual Filing

- Project Lifecycle & Deliverables: A Recap

- Project Timeline

- A Closer Look: Where and How to View Form 700 Electronic Filings

- A Look Ahead: Form 700 Filing Compliance Review Planning

Form 700 E-Filing Expansion

2022 GO-LIVE
Added 4700+ E-Filers

2021
2020
2019
2018
2017
2016
2015

Effective January 1, 2022, all persons who occupy positions designated in the City's Conflict of Interest Code to fil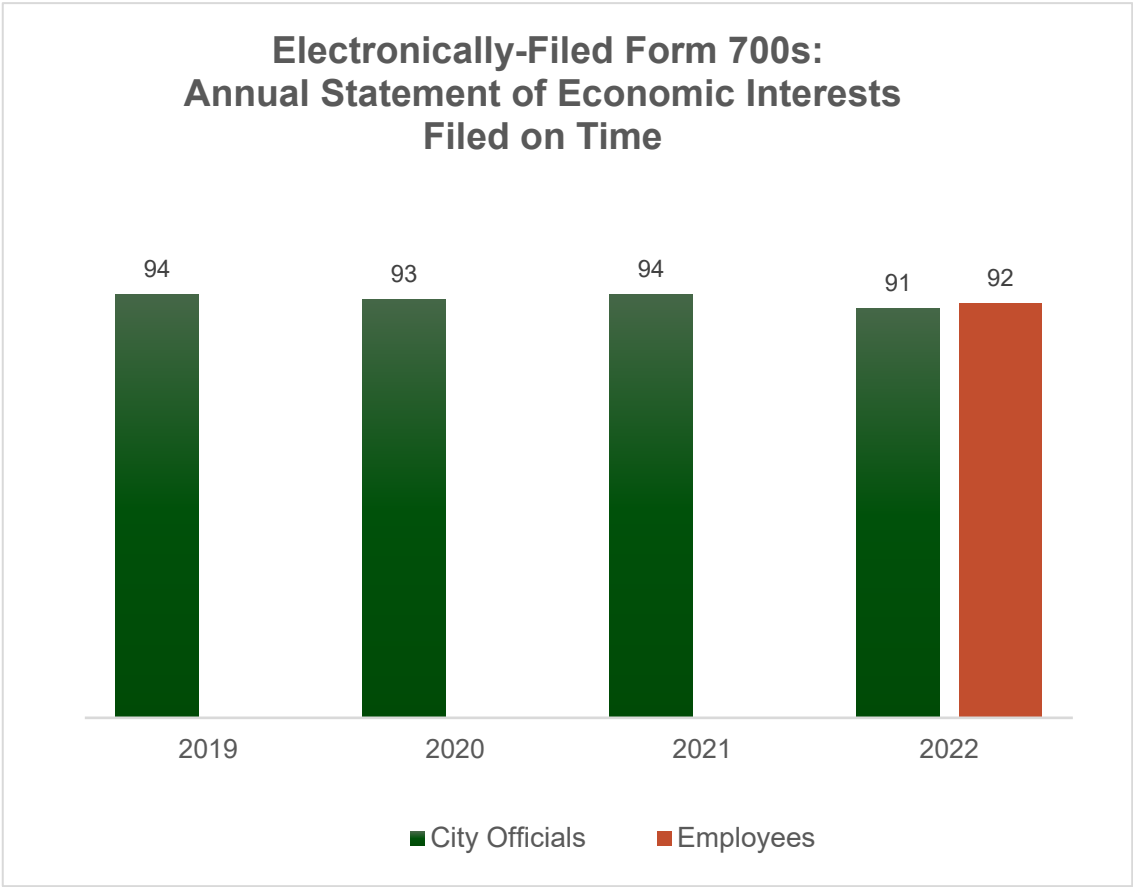e Statements of Economic Interest (Form 700) were required to file their statements **in electronic format using** the Ethics Commission's **NetFile system.**

April 2022 Annual Filing – Overview I

**Electronically-Filed Form 700s:
Annual Statement of Economic Interests
Filed on Time**

One-Time Annual Form 700 Filings, 2022, by Filer Category

City Elective Officials	100%
Designated Filers	92%
Department Heads and Board/Commission Members	89%

April 2022 Annual Filing – Overview II

**Percent of Annual Form 700 Filers
Whose Filing Disclosed a Reportable Economic Interest on Schedule Shown**

19%	7%	10%	15%	1%	2%	0%
A-1 Investments	A-2 Business Entities/Trust	B Real Property	C1 Income	C2 Income/Loans	D Income/Gifts	E Travel Payments

Form 700 Reporting Schedule

■ Reportable interest   ■ No Reportable interrest
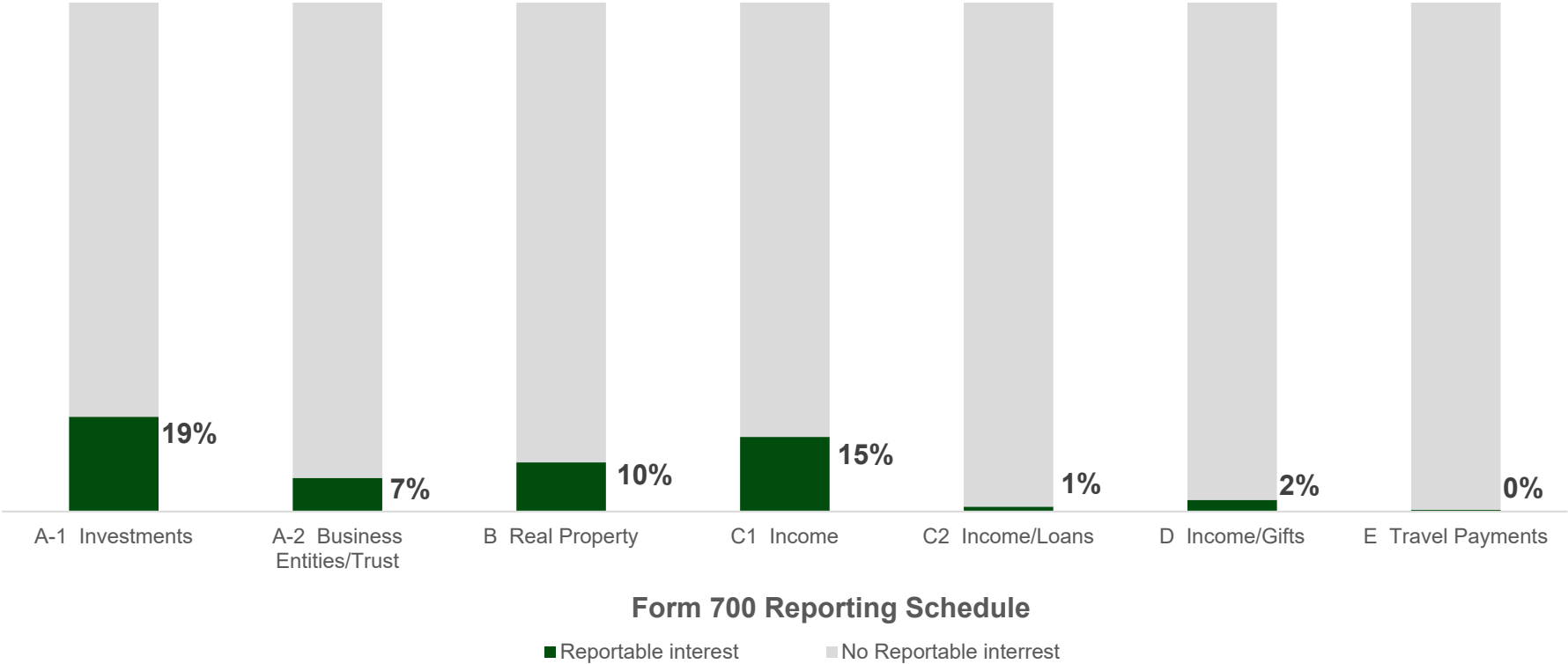
Recap: Project Components

Cross-functional input and workflows = essential to success in project delivery

Initial Scoping Activities

- ✓ Preliminary meetings with select departments
- ✓ PeopleSoft update in coordination with DHR and City departments

Legislative

- ✓ Meet & Confer planning, coordination and session with Employee Unions
- ✓ Draft and pass regulation to enforce e-filing for designated employees
- ✓ Biennial Code review and adoption
- ✓ COI Code update

Technical Scoping

- ✓ Evaluate, test, and document functional specs for each business process and user role
- ✓ Identify and address Netfile technical issues/constraints
- ✓ Evaluate training development software and City's LMS
- ✓ Test and confirm NetFile user/filer implementation procedures

Design and Planning

- ✓ Design and lock business processes and best practices
- ✓ Conceptualize and adopt training and outreach plan
- ✓ Identify Enforcement role and referral procedures
- ✓ Determine additional staffing needs
- ✓ Confirm/update departmental filing officer roster
- ✓ Confirm/update designated filer rosters

Development

- ✓ Develop API and datasets
- ✓ Develop user guides and guidance materials
- ✓ Develop filing officer and filer training eLearning modules
- ✓ Develop pre- and post-filing notice templates for use by City departments
- ✓ Prepare content for SEI webpages

Implementation

- ✓ Deploy API and datasets
- ✓ Reconfigure SEI webpages
- ✓ Coordinate NetFile Data Upload
- ✓ Launch/announce filing officer training modules in City's LMS (SF Learning)
- ✓ Commission NetFile system credentials to filing officers
- ✓ Announce commencement of E-Filing to impacted filers
- ✓ Publish website content and guidance materials.

Recap: Project Deliverables

Implementation of Tools/Technology

- Confirm/update Filing Officer rosters
- Confirm/update Departmental Filer rosters
- Import filers, departments and conflict of interest code positions into NetFile system
- Form 700 Support Portal
- Launch Filing Officer training modules in CCSF learning management system

Communications & Outreach

- Citywide communication announcing new requirement and effective date
- Preliminary Departmental meetings to elicit questions about project/processes
- Scheduling, announcement and management of training availability

Guidance & Training

- Online guidance materials and resources for Filers and Filing Officers
- Virtual Q&A sessions for Filing Officers
- Virtual Filer Information sessions in coordination with City Attorney's Office
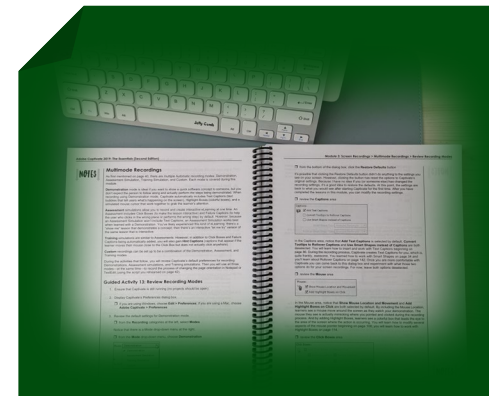
Feedback & Ongoing Program Refinement

- Post-filing surveys
- Monthly Filing Officer outreach
- Continued development/expansion of eLearning curriculum
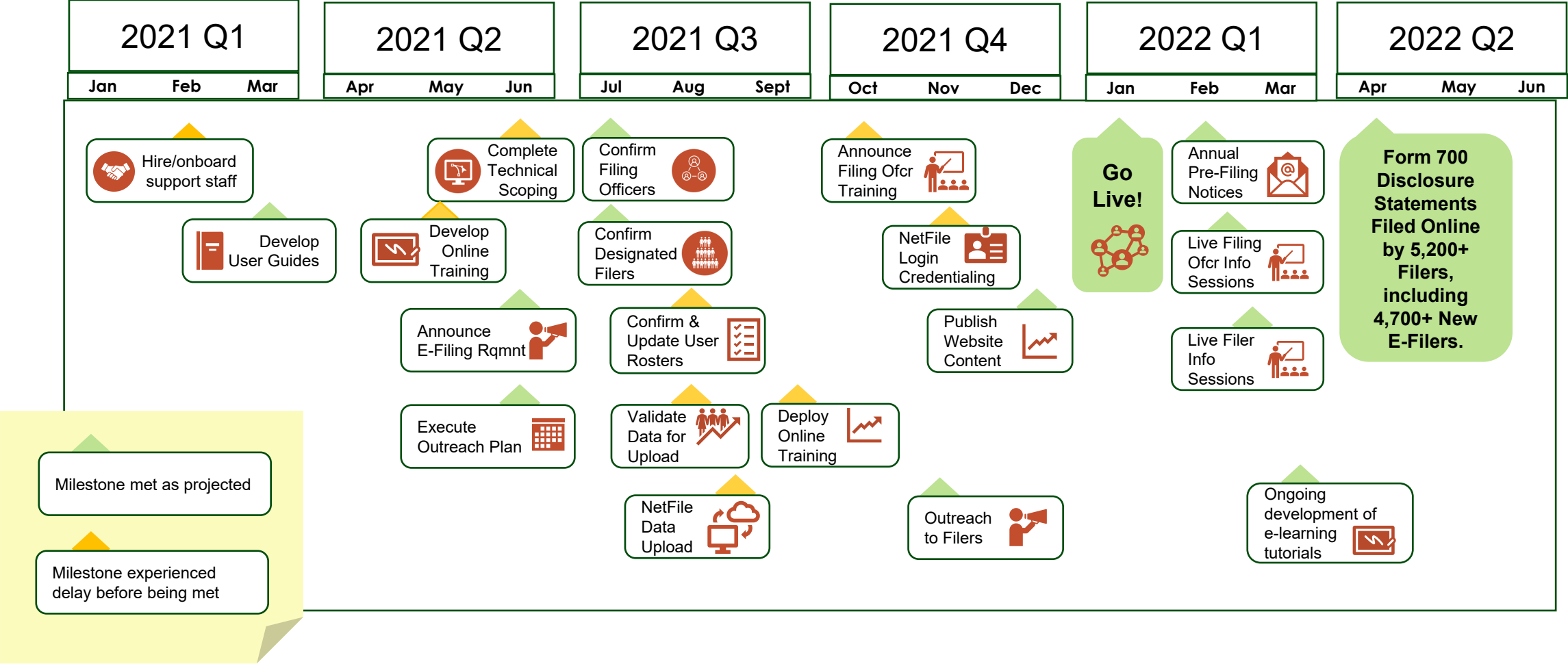
Project Deliverables | Examples

Guidance materials and communications developed with the first-time user in mind

- ✓ **Fact Sheets** that are designed to consolidate essential information in a condensed, easy to read format

- ✓ **Comprehensive User Manual** that addresses the "when, why and how" and all provides essential information in one place, including active table of contents, and helpful tips

- ✓ **Process Flowcharts** that provide visual representations of the Form 700 workflow for each filing event

- ✓ **Reconfigured Web Pages and Content** designed to provide a more intuitive experience for users and centralized access to essential information and resources

- ✓ **Frequent emails** with readily accessible linked materials that are viewable online and have a download/print option

Project Timeline

2021 Q1	2021 Q2	2021 Q3	2021 Q4	2022 Q1	2022 Q2
Jan Feb Mar	Apr May Jun	Jul Aug Sept	Oct Nov Dec	Jan Feb Mar	Apr May Jun

Hire/onboard support staff

Develop User Guides

Complete Technical Scoping

Develop Online Training

Announce E-Filing Rqmnt

Execute Outreach Plan

Confirm Filing Officers

Confirm Designated Filers

Confirm & Update User Rosters

Validate Data for Upload

Deploy Online Training

NetFile Data Upload

Announce Filing Ofcr Training

NetFile Login Credentialing

Publish Website Content

Outreach to Filers

Go Live!

Annual Pre-Filing Notices

Live Filing Ofcr Info Sessions

Live Filer Info Sessions

Ongoing development of e-learning tutorials

Form 700 Disclosure Statements Filed Online by 5,200+ Filers, including 4,700+ New E-Filers.

Milestone met as projected

Milestone experienced delay before being met

How to View Form 700 Disclosures

View New Economic Interest Statements Filed by City Officers and Designated Employees

Learn more about the latest Form 700 filings and how these public disclosure statements support government accountability.
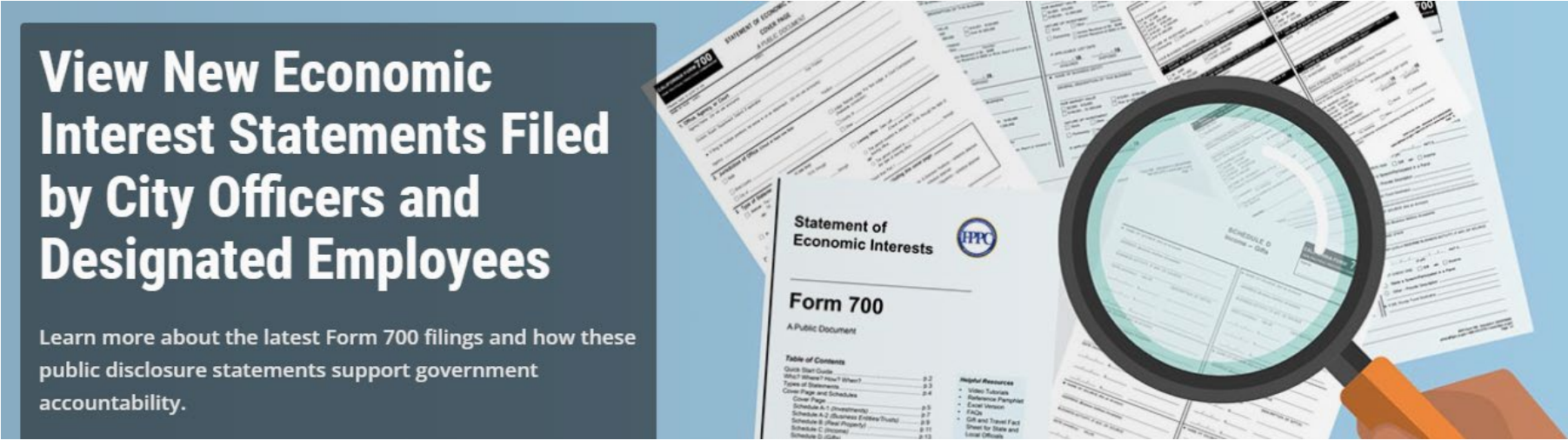
Search and View Filings	Search Content Across Filings	Search, Sort, and View Bulk Data for All Filers

Search and View Filings

View E-filed Form 700s

View Form 700 statements filed electronically by Elected Officials, Department Heads, Board Members and Commissioners.

- Find e-filed forms based on filer's name, position, department or filing period
- View the forms in PDF format

View Statements

https://public.netfile.com/pub/?aid=SFO

Search Content Across Filings

Search and Filter the Contents of Form 700 Statements

Search within the contents across e-filed From 700 statements to view reportable financial interests such as investments, interests in real property, and income (including gifts and travel payments).

- Find reported data across e-filed statements based on search text, department name, filing year or type of financial interests
- View filtered results on the web page or download to Excel

Search Contents

https://public.netfile.com/Pub/Default.aspx?m=t&AID=SFO

Search, Sort, and View Bulk Data for All Filers

Form 700 Datasets

Research Statement of Economic Interests data in a tabular form via SF OpenData.

- View data in a spreadsheet format
- Download datasets in a variety of data formats
- Save search criteria
- Build and save your own maps, charts and graphs
- Integrate data with other City datasets

Research Datasets

https://sfethics.org/disclosures/city-officer-disclosure/statement-of-economic-interests-city-officer-disclosure/data-statement-of-economic-interests
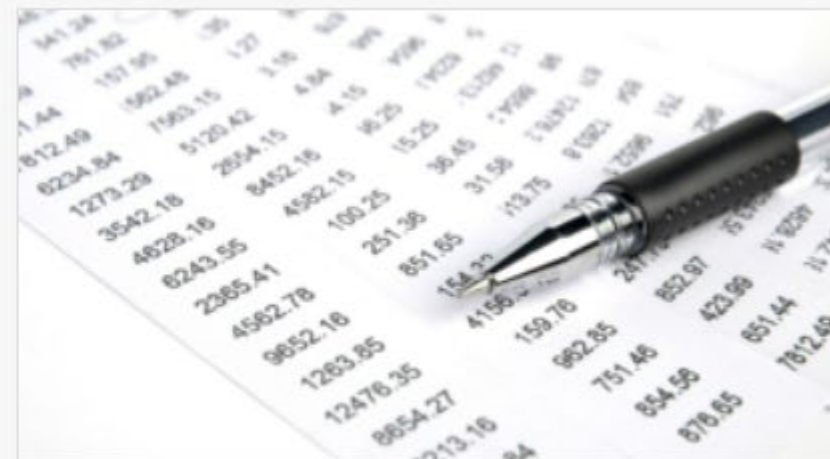
Looking Ahead
Form 700 Filing Compliance Reviews

V. Reporting
- Issue public report of findings and recommendations
- Obtain feedback on pilot compliance review process to support ongoing effectiveness and impact

IV. Recommendations
- Based on findings, develop recommendations to address any compliance issues surfaced and any training needs or process improvements that may be indicated

I. Planning
- Determine scope and criteria to pilot post-filing compliance review

II. Conduct Reviews
- Review statements to determine degree of compliance with applicable criteria

III. Analyze Findings
- Assess compliance findings and identify any patterns that may point to areas of training needs or process improvements

Compliance Review Framework
Planning
Conduct Reviews
Analyze Findings
Recommendations
Reporting