

2022 POST-ANNUAL FILING DEADLINE PROCEDURES

Filing officer:

Now that the annual filing deadline has passed, it's time to turn your attention to Post-Annual Filing Tasks. This guidance document will provide instructions for:

1. Identifying Non-Filers
2. Confirm the employment status of non-filers in your department
3. Filers who left office in 2022
4. Initiating Late Filer Procedures

1. Identifying Non-Filers

To identify non-filers, you will use the “Filing Status Report” in the NetFile SEI Admin System. Log-in to your NetFile Admin account and on the main menu bar, hover over *Reports* and select *Filing Status Report*.

- For *Type of Report*, select “Non-Filers”

The screenshot displays the NetFile SEI Admin System interface. The top navigation bar includes: SEI, Filer Search, Filers, Filings, Requirements, Reports, Communications, Code Management, and Advanced. The 'Reports' dropdown menu is open, listing: Filing Status Report (highlighted), Filer Position Status, Filing Review Report, 87200/87300 E-Filings Report, Positions Report, E-Mailed Letters Report, Contact History Report, and Fines Report. The main content area is titled 'Filing Status Report' and contains several search filters: Search Type (Standard, Advanced, All Possibly Inactive), Search Deadlines using a date range (From Date, To Date), Search Filings using a date range (From Date, To Date), E-Filings Co, Department, Type of Report (highlighted), Type of Filer, Filer Name, Filing Type, and Form Type (Select a form type...). The 'Type of Report' dropdown is open, showing: All Filers, Non-Filers (highlighted), Successful Filers, and Late Filers.

Note: The difference between non-filer and late filer – a non-filer has not filed; a late filer has filed but filed after the deadline.

- For *Filing Type*, select “Annual”

The screenshot shows the 'Filing Status Report' search interface. At the top, there is a navigation bar with menu items: SEI, Filer Search, Filers, Filings, Requirements, Reports, Communications, Code Management, and Advanced. Below this, the 'Filing Status Report' title is displayed. The search criteria are organized into several sections:

- Search Type:** Radio buttons for Standard, Advanced (selected), and All Possibly Inactive Filers.
- Search Deadlines using a date range:** Fields for From Date and To Date.
- Search Filings using a date range:** Fields for From Date and To Date.
- E-Filings Containing (from 2014 on):** Radio buttons for Schedules, Cover Only, and Both (selected).
- Department:** A dropdown menu.
- Type of Report:** A dropdown menu with 'Non-Filers' selected.
- Type of Filer:** A dropdown menu.
- Filer Name:** A text input field with a dropdown arrow.
- Filing Type:** A dropdown menu with 'Annual' selected and highlighted in yellow.
- Form Type:** A list of options: Annual, Assuming, Leaving, and Candidate.
- Required To File:** Radio buttons for Yes (selected), No, and All Filers.

At the bottom, there are three buttons: Search (highlighted with a red box), Clear, and Export.

- Click “Search” to view results on the screen, or “Export” to export the data to Excel

2. Confirm the employment status of non-filers in your department

Q: Did the filer leave the position prior to January 1, 2022?

A: If a filer left the designated position in 2021 or prior, they are not required to file the Annual statement that was due on 4/1/2022 for that position.

Scenario 1: If the filer left the position prior to January 1, 2022, **and** has no submitted filings in their *Filing History table*, **and** has only one position listed in their *Filer Positions table*, Ethics Commission staff can delete the filer from the system. (Note: The system will not allow deletion of a filer who has submitted filings or has more than one designated position).

- If the above applies to filer(s) in your department, submit a ticket through the Ethics Commission Form 700 Support Portal. Include the following information for each filer you wish to delete from the system:
 - First Name
 - Last Name
 - Filer ID (shown on the filers’ dashboard under their name; *see image below*)
 - Department
 - Position
 - Date Left

Filer Dashboard

First Name	Ilene (test)
Middle Name/Initial	
Last Name	Gage Edit
Filer ID	SFO-155928
Employee ID	01010101 Edit
Filer Type	SFO Board Member Edit Filer Type
Is 800	<input type="radio"/> Yes <input checked="" type="radio"/> No

Filer Log In E-Mail	ilene.gage72@gmail.com Change E-Mail
Filer Notification E-Mail	ilene.gage72@gmail.com Change E-Mail
Terminated?	No
Filer Links	Open FSR for this Filer...
Rebuild FSR for Filer	Rebuild FSR

Filer Positions	Position	Department	Categories	Date Started	Date Left	Add Position
Agency	Commissioner	Ethics - Ethics Commission	1			Action
City and County of San Francisco						

Scenario 2: If the filer left the position prior to January 1, 2022 and has recorded filings in their *Filing History table* or has multiple positions listed in their *Filer Positions table*, you cannot delete the filer from the system. However, you can “force-terminate” the position and **remove** the resulting leaving office requirement from the filer’s account. (Note: Generally, a force-termination should only be performed in very limited situations, such as, a filer has passed away, or a filer has left their position and has been referred to the Ethics Commission’s Enforcement Division due to failure to file (see late filer procedures below). Once an account has been “force-terminated” a filer cannot log-in to the system to file statements)).

To force-terminate a position from a filer’s dashboard, on the main menu bar, hover over *Filers* and select *View & Edit Filers*.

The screenshot shows the top navigation bar of the San Francisco Ethics Commission system. The 'Filers' menu is open, and the 'View & Edit Filers' option is highlighted in yellow. Other options in the menu include 'Add a New Form 700/87200 Filer', 'Add a New 800 Filer', 'Add Filer Contacts', and 'Tasks Panel'. The 'System Notification' panel is also visible, showing 'No notifications available' and a checkbox for 'Receive e-mail for each notification'.

- Enter the Filer’s First and/or Last Name and click “Select” button

View & Edit Filers

First Name	<input type="text"/>	Department	<input type="text"/>
Last Name	<input type="text" value="gage"/>	Position	<input type="text"/>
E-Mail	<input type="text"/>	Position #	<input type="text"/>
Filer Status	<input type="text" value="All"/>	Type of Filer	<input type="text"/>

[Submit](#)

➤ Click “Edit” next to the filer’s name to open their dashboard

Edit	Filer Name	Notification E-Mail	Department	Position	Filer Type	Delete
Edit	Gage, Alea	alea.gage@sfgov.org	Designated - Mayor Office of the	Mayor's Office of Housing and Community Development-- Mayoral Staff	700	Delete
Edit	Gage, Henry	henry.gage@sfgov.org	Designated - District Attorney Office of the	All Attorneys	700	Delete
Edit	Gage, Ilene (test)	rgage72@gmail.com	Ethics - Ethics Commission, Ethics - Ethics Commission, Ethics - Airport	Auditor, Commissioner, Director	700	Delete
Edit	Gage, Rachel	rachel.gage@sfgov.org	Designated - Ethics Commission	Engagement and Compliance Division--Principal Program Manager	700	Delete

➤ **Add a note in the Filer Dashboard for your audit trail.** Your note should specify the events that occurred which resulted in the position being ‘force-terminated’ (e.g., filer left office/position prior to 1/1/22 and filed a paper leaving office statement). **Important:** After you’ve finished typing the note, click “Enter Note” button to record your note entry.

Filer Dashboard

First Name Ilene (test)

Middle Name/Initial

Last Name Gage Edit

Filer ID SFO-155928

***Employee ID** 01010101 Edit

***Filer Type** 700 Edit Filer Type

Is 800 Yes No

Filer Log In E-Mail [redacted] Change E-Mail

Filer Notification E-Mail rgage72@gmail.com Change E-Mail

Terminated? No

Filer Links [Open FSR for this Filer...](#)

Rebuild FSR for Filer [Rebuild FSR](#)

Filer Positions							<input checked="" type="checkbox"/> Add Position
Agency	Position	Department	Categories	Date Started	Date Left	Actions	
City and County of San Francisco	Commissioner	Ethics - Ethics Commission	1			Action	
City and County of San Francisco	Auditor	Ethics - Ethics Commission				Action	
City and County of San Francisco	Director	Ethics - Airport	1		04/01/2022	Action	

Add Note						
Edit	Type	Date	User	Description	Approve	Delete
Edit	Notification: rgage72@gmail.com	01/12/2022	Boz, Elaine (TEST ACCT)	test note re: LO and filed ...	Approve	Delete

➤ **Force Terminate the position.** Next to the position in the *Filer Positions* table, click “Action”

Filer Positions							<input checked="" type="checkbox"/> Add Position
Agency	Position	Department	Categories	Date Started	Date Left	Actions	
City and County of San Francisco	Commissioner	Ethics - Ethics Commission	1			Action	
City and County of San Francisco	Auditor	Ethics - Ethics Commission				Action	
City and County of San Francisco	Director	Ethics - Airport	1		04/01/2022	Action	

- In the *Edit Position dialog*, click the “Leave” button
- Enter the date the employee left office and click “Add Leaving Deadline” button
- Click “Action” next to the position in the *Filer Positions* table again
- In the *Edit Position dialog*, click the “Terminate” button
- You’ll be asked to confirm that you want to terminate, click the “Terminate!” button followed by “OK” to complete the force termination.

Note: The above steps will force-terminate the position, however there is one additional step. If the filer filed a leaving office statement on paper when they left the position, you want to ‘exclude’ the leaving office (L) requirement that was automatically generated when you entered the filer’s leaving office date. If the filer did not file the leaving office statement on paper, the leaving office requirement should remain, and you can skip the next step.

- **Exclude the leaving office requirement.** To exclude the leaving office requirement, locate the requirement in the *Active Filing Deadlines table* labeled Type ‘L’ click “Exclude.” If you are unable to remove this requirement, contact the Ethics Commission for assistance.

Active Filing Deadlines						Exclude All Annual Deadlines...	<input checked="" type="checkbox"/> Add Candidate Deadline
Edit	Deadline	Period Start	Period End	Type	Form	Fulfilled?	Exclude
Edit	5/2/2022	04/02/2021	04/01/2022	L	fpc700_2022	No	Exclude

IMPORTANT: If the filer left office on or after January 1, 2022, you do not want to ‘force-terminate’ the position. A filer who left office in 2022 will generally have a leaving office requirement that should be filed electronically in NetFile. Paper filings are no longer accepted effective January 1, 2022. Force-terminating a position disables a filer’s ability to log-in and file Form 700 requirements that they may have due. See “Offboarding a Form 700 Filer” section in the [Filing Officer Manual](#) for instructions.

Q: In 2021, did the employee transfer from a designated position that was required to file a Form 700, to a non-designated position that is not required to file?

A: Treat this as a filer who left office. If the filer’s new position is not listed in your department’s section of the Conflict of Interest Code (i.e., a designated position), follow the steps above to Force Terminate the account. If a filer left office on or after January 1, 2022, the filer will generally have a leaving office requirement. (See “Offboarding a Form 700 Filer” in the [Filing Officer Manual](#) for applicable instructions).

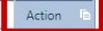
3. Filers who left office in 2022

Q: Did the filer leave office on or after January 1, 2022?

A: A filer who left office this year is required to file an Annual statement as well as a Leaving Office statement electronically using the NetFile system. (Note: The Annual statement due on 4/1/2022 covers all of 2021; the leaving office statement covers January 1, 2022 through the date the filer left office).

To offboard a filer that has a leaving office requirement, perform the following steps:

- **Terminate the position.** Next to the position in the *Filer Positions table*, click “Action”

Filer Positions						<input type="checkbox"/> Add Position
Agency	Position	Department	Categories	Date Started	Date Left	Action
City and County of San Francisco	Auditor	EORCDH Ethics Commission		11/8/2021		

- In the *Edit Position dialog*, click the “Leave” button
- Enter the date the employee left office and click “Add Leaving Deadline” button.

Note: A filer with both an Annual and a Leaving Office requirement due may file both requirements at the same time by ‘combining’ them. If combining the requirements, the filing deadline is no later than 30-days after the leaving office date, or the annual April 1st deadline, **whichever date is earlier**. If a filer has both the an annual and leaving office due, the filing notice you send to the filer should include instructions on how to combine their leaving officer/annual filings (see [Sample Leaving Office Notice \(With a Combined Annual\)](#)).

Q: Did the filer Assume Office in 2022?

A: A filer who assumed office in 2022 did not serve in 2021; therefore, is not required to file an Annual statement due 4/1/2022. However, the filer is required to submit their Assuming Office statement within 30-days after their assuming office date (“i.e., start date). Be sure that the filer’s account has the correct Assuming Office date entered when creating the filer’s account.

Reminder: Departmental filing officers create new filer accounts in the NetFile system (see “Onboarding a Form 700 Filer” section in the [Filing Officer Manual](#) for instructions).

4. Initiating Late Filer Procedures

Q: I’ve identified the filers in my department who were required to file the annual Form 700, but have not yet filed (i.e., non-filers). What steps should I take?

A: After any filing deadline has passed (annual, assuming, leaving office), you must follow up with non-filers. This is not a discretionary duty. Written late notifications must be sent to non-filers within 30 days after a deadline (the earlier the better). If applicable, a second late notice should be sent within 30 days after the date of the first late notice. For your convenience, late notice templates are available [online](#) however you may use your preferred language. We advise adding a note to late filers’ accounts to document the date late notice(s) were sent for your audit trail. Alternatively, you can attach a copy of late notice(s) in the “Contact Log” on the filer’s dashboard. (Note: Filers cannot see your notes or contact log entries).

Filer Positions							<input checked="" type="checkbox"/> Add Position
Agency	Position	Department	Categories	Date Started	Date Left	Actions	
City and County of San Francisco	Commissioner	Ethics - Ethics Commission	1			Action	
City and County of San Francisco	Auditor	Ethics - Ethics Commission				Action	
City and County of San Francisco	Director	Ethics - Airport	1		04/01/2022	Action	

Edit		Type	<input checked="" type="checkbox"/> Add Web Site	<input checked="" type="checkbox"/> Add E-Mail	<input checked="" type="checkbox"/> Add Phone	<input checked="" type="checkbox"/> Add Address	Delete
Edit		Notification: rgage72@gmail.com					

Add Note					<input checked="" type="checkbox"/> Add Note	
Edit	Date	User	Description	Approve	Delete	
Edit		01/12/2022	Boz, Elaine (TEST ACCT)	test note re: LO and filed ...	Approve	Delete

Filing History										<input checked="" type="checkbox"/> Add Filing	
Edit	Date	Period	Form	Type	E-Filed?	Int	Ext	Rpt/Seq#	Request Amendment	Add Fine	Delete
No filings yet.											

Change Status		<input checked="" type="checkbox"/> Change Status	Contact Log		<input checked="" type="checkbox"/> Add Contact	<input checked="" type="checkbox"/> Add Phone Contact	
Date	Status		View	Date	Name	Description	Delete
02/18/2022	ACTIVE		View		03/15/2022	E-Mail Blast Letter for Ilene (test) Gage	E-Mail Blast
01/27/2022	TERMINATED						

IMPORTANT: Beginning on the 91st day, and after a minimum of two written attempts to attain compliance, filing officers should refer non-filers – that have failed to file outstanding requirements within 90-days after the filing deadline – to the Ethics Commission’s Enforcement Division using the online complaint form. See *Late Filer Procedures* chapter in the [Filing Officer Manual](#) for more information and step-by-step instructions.

If you encounter a scenario not covered in this guidance document, or have questions about the procedures covered, contact the Ethics Commission via our [Form 700 Support Portal](#) for assistance.

Thank you,

Form 700 Support Team
 SF Ethics Commission | Engagement & Compliance Division