

RACIAL EQUITY ACTION PLAN - PHASE 1

A Racial Equity Action Plan (RE Action Plan) shall include Racial Equity indicators to measure current conditions and impact, outcomes resulting from changes made within programs or policy, and performance measures to evaluate efficacy, that demonstrate how a City department will address Racial Disparities within the department as well as in external programs. — ORE Legislative Mandate, [Ordinance No. 188-19](#)

Ethics Commission

Racial Equity Lead

Last Updated
May 31, 2023

Racial Equity Team

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Please see Process section on the following page.

Racial Equity Action Plan Template Key

ACTIONS: specific acts to accomplish to achieve departmental goals

RESOURCES COMMITTED: what is needed to perform actions; financial, human, and/or material

INDICATORS: quantifiable measure of an action’s success; how much, how well, or is anyone better off?

TIMELINE: dates denoting the start and end of the action

IMPLEMENTATION: detailed plan on how the action will be accomplished; month, quarter, and/or year

STATUS: the action’s current status, updated regularly [ongoing | in-progress | completed | not started]

LEAD: staff, committee, or body responsible for the action and/or accountable for its completion

Racial Equity Action Plan Sections

1. Hiring and Recruitment
2. Retention and Promotion
3. Discipline and Separation
4. Diverse and Equitable Leadership and Management
5. Mobility and Professional Development
6. Organizational Culture of Inclusion and Belonging
7. Boards and Commissions

PROCESS

The Ethics Commission’s Racial Equity Action Plan was initially developed by the Commission’s Executive Director, LeeAnn Pelham, with consultation of the staff Senior Leadership Team, Department of Human Resources, City Attorney, and with review by the five-member Ethics Commission at the Commission’s [December 14, 2020 Regular Meeting](#). The Plan has since been revised in August 2021 and May 2022. Over this period, the Commission’s Plan has remained focused on its hiring priorities and on staff recruitment, retention, and promotion. Due to the need to balance ongoing Ethics Commission staffing resource constraints with the volume and pace of competing urgent organizational priorities, the department has not yet had the opportunity to engage all staff in the process of further developing and refining its Racial Equity Action Plan. As of the date of this report, the Commission has ten vacant positions, including the Executive Director.

DEPARTMENT BACKGROUND

Number of Authorized Positions 34
Current Number of Employees 24
Annual Operating Budget \$7.1 million

Our mission 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. With public service a 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, just, and made without any regard to private or personal gain.

Department History

The San Francisco Ethics Commission was created directly by the City’s voters with the passage of Proposition K in November 1993. Through its staff, the Commission is responsible for the independent and impartial administration and enforcement of laws related to campaign finance, public financing of candidates, governmental ethics, conflicts of interests, and registration and reporting by lobbyists, campaign consultants, permit consultants, and major developers. The Commission also administers an Election Campaign Fund that provides partial public financing for qualified candidates for City elective office.

Our programs include:

- **PUBLIC DISCLOSURE, COMPLIANCE GUIDANCE, AND TRAINING** provides compliance, filing assistance, and training for persons required to submit public disclosure statements and other filings, including political candidates and committees, lobbyists, city officials and employees, campaign and permit consultants, and major developers. Provides public access to disclosed information.
- **AUDITS** conducts audits of campaign committees, publicly financed candidates, and lobbyists to ensure compliance with applicable state and local laws, and also verifies eligibility and disbursements from the Election Campaign Fund for publicly-matched funds to candidates for the Board of Supervisors and Mayor.
- **POLICY AND ADVICE** provides formal and informal advice regarding the application of ethics, campaign finance, and lobbyist laws, and requirements for campaign consultants, permit consultants, and major developers; conducts policy analysis and legislative reviews; issues reports on programs and issues within the Commission’s jurisdiction; and oversees the registration and regulation of campaign consultants and lobbyists.
- **INVESTIGATIONS AND ENFORCEMENT** investigates complaints alleging violations of laws under the Commission’s jurisdiction and pursues administrative enforcement when warranted.

The Commission acts as filing officer for over 80 different types of public disclosure statements and reports related to governmental ethics, campaign, and lobbying that are filed by City officials, local candidates, political committees, lobbyists, permit consultants, campaign consultants, major developers and major donors; audits certain of these statements for compliance with state and local laws; investigates complaints alleging ethics and political reform law violations; raises public awareness of these laws; researches and proposes legislative changes; and provides guidance and advice about the applicability of the City’s political reform laws to City candidates, officeholders, officers, employees and the general public. Each appointed by a different elected City official and with a sworn responsibility to the public trust, Members of the Ethics Commission are pledged to a high standard of excellence in government accountability. Together with its staff, the Commission works to effectively implement the laws within its jurisdiction, and to ensure those laws are strong, workable in practice, and enforceable.

Vulnerable Populations Served

Please include your response to the Office of Racial Equity’s Vulnerable Populations Engagement Assessment you submitted, with any relevant updates. Please submit as an Appendix.

The survey was submitted on May 1, 2022. Please see Appendix A.

Vulnerable Populations Engagement Assessment

Please share how you engage with individuals and groups in San Francisco’s communities of color. What percentage of your budget supports this effort, what critical issues face these communities and groups, and what departmental accomplishments are in support of the identified population. Please use the table below and add rows as needed. Please submit as an Appendix.

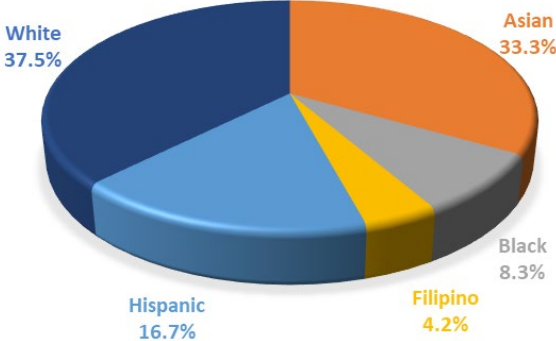
The assessment was completed on May 1, 2022. Please see Appendix B.

CURRENT WORKFORCE DEMOGRAPHIC DATA

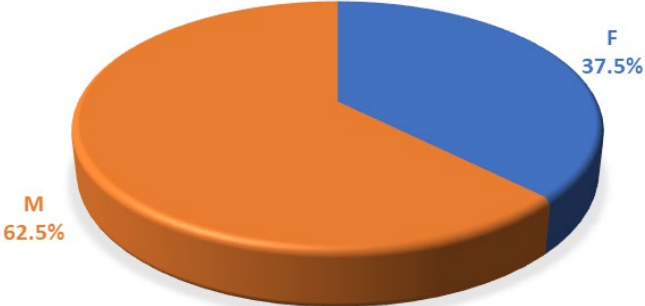
Note: The Office of Racial Equity worked with the SF Controller and Department of Human Resources to produce a report pursuant to its ordinance; [this report](#) was released on March 10, 2020 to Mayor London Breed and the SF Board of Supervisors. As a follow-up to the Phase I report publication, ORE will work with DHR, the Office of the Controller and City Departments on producing Phase II analysis. The Phase II report will provide a more granular review of the intersection of department-specific employment decisions and race as well as gender, namely for hiring, promotions, professional development, terminations, and compensation decisions for all City employees. In the meantime, basic departmental workforce demographic data has been provided by DHR to departments.

Current departmental workforce demographic data for Ethics Commission staff as provided by the Department of Human Resources is shown below:

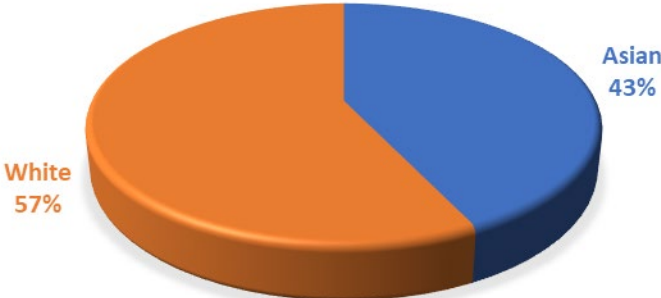
ETHICS COMMISSION STAFF ETHNICITY



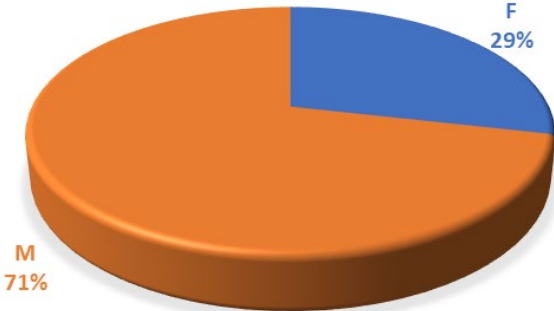
ETHICS COMMISSION STAFF GENDER

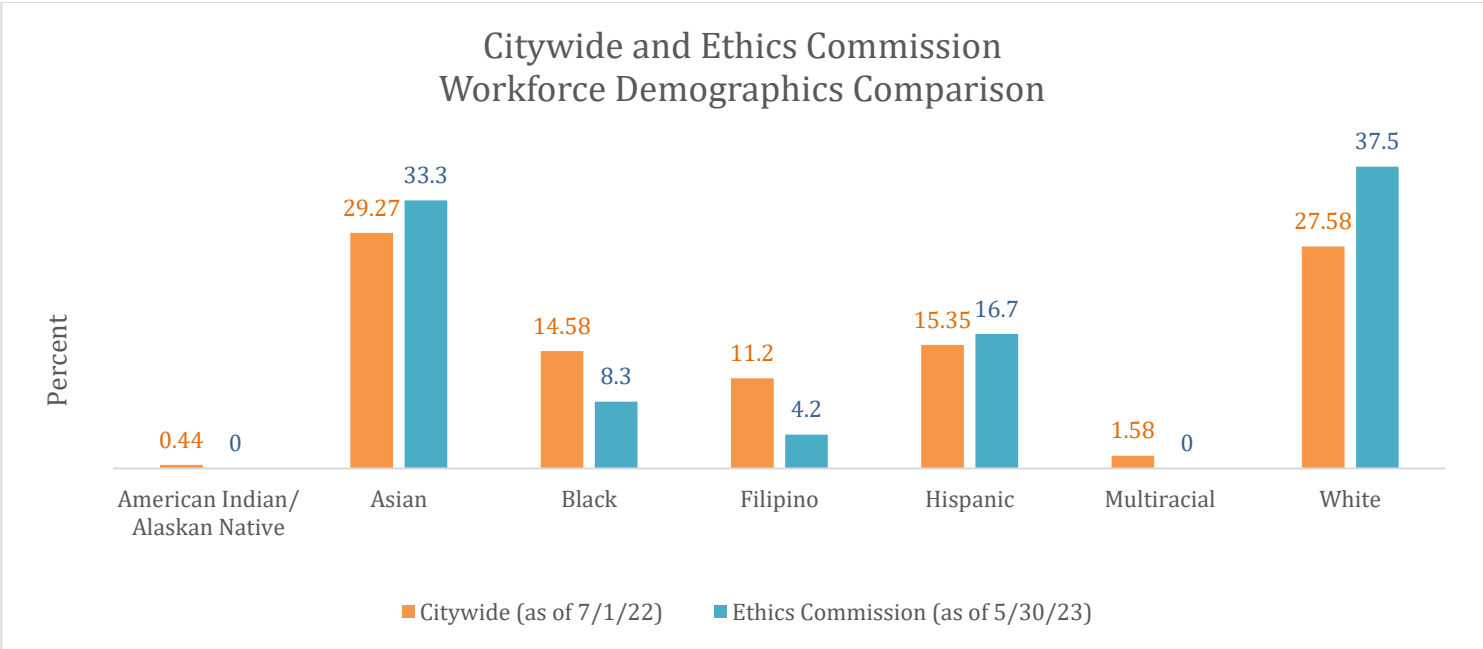


ETHICS COMMISSION SENIOR LEADERSHIP ETHNICITY



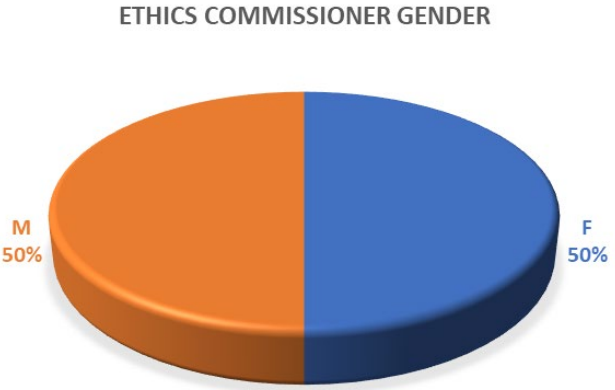
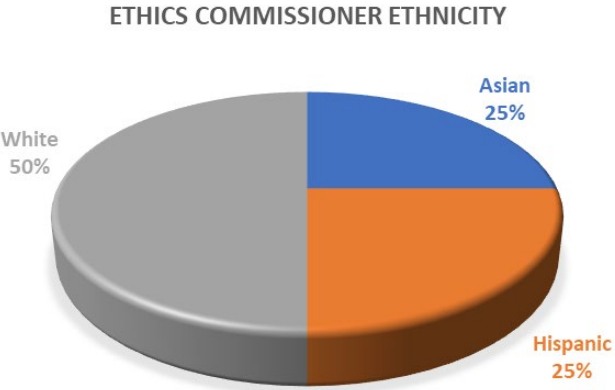
ETHICS COMMISSION SENIOR LEADERSHIP GENDER





[Citywide data published by DHR](#)

Current demographic data for Ethics Commission as provided by the Department of Human Resources is shown below:



RESULTS FROM DEPARTMENT ASSESSMENT AND EMPLOYEE SURVEY

Please describe themes and key takeaways from your survey results. You may submit this as an Appendix.

- Did this survey uncover any issues related to issues of interpersonal racism in the Department?
- Did this survey uncover any issues related to issues of institutional racism within the Department?
- Do all employees have regular access to training opportunities and professional development? If not, why not?
- Do all employees feel safe and included at work?
- Do all employees have equal access to advancement and promotional opportunities?

To date, the department has not yet conducted an employee survey due to staffing resource constraints and competing organizational priorities, including in the areas of staff recruitment and hiring.

1. HIRING AND RECRUITMENT

Identify, Attract, Invest in and Retain a Diverse City Workforce. Racial homogeneity within hiring and recruiting networks reproduce historical inequities in access to family-sustaining, living wage jobs. Therefore, cultivating an inclusive workforce requires intentional efforts in and with diverse, underrepresented and underserved communities. Rather than passively waiting for a more diverse candidate pool and people with more varied backgrounds to apply, Departments can and should actively

seek these individuals out. This includes assessing the most basic barriers to access that influence the City's applicant pool, and developing a clear, intentional outreach strategy. Further, partnering creatively within new outlets, community-based organizations, BIPOC professional networks, re-entry programs, SFUSD and community college systems will cultivate a rich pool of diverse candidates.

DEPARTMENT GOAL

What is the department's overall goal on Hiring and Recruitment?

The Ethics Commission is committed to recruiting, hiring, and retaining a diverse, collaborative, and high performing staff of individuals whose individual experiences, knowledge, and talents collectively drive achievement of the Commission's unique mission in San Francisco city government. We honor and value diversity, inclusion, and engagement, and are committed to promoting racial equity and to creating and sustaining a work environment that reflects and engages the diversity of our communities. The Commission provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, sex, gender, gender identity or expression, national origin, age, disability, genetics, or any other protected category.

1.1. Develop a hiring and recruitment policy and procedure that aligns with the Citywide Racial Equity Framework and the department’s RE Action Plan.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION PLAN	STATUS	LEAD
1.1.1. Assess current conditions and barriers that impede 1) potential applicants’ ability to competitively apply to available positions, and 2) disallows current, competitive employees to apply.	Senior Leadership Team and Executive Director in consultation with DHR.	Departmental review of hiring processes and practices is completed.	Prior to posting of job announcements and ongoing during application period.	Assess if any factors such as complexity of application process, position requirements, recruitment outreach efforts etc., pose barriers to attracting internal and external candidates.	Ongoing.	Executive Director.
1.1.2. Implement an annual staff survey to assess departmental diversity and inclusivity that would inform hiring and recruitment goals, particularly looking for gaps within data. Survey data and results are disaggregated and included in the department annual review. ¹	Senior Leadership Team and Executive Director in consultation with DHR.	Survey is administered annually. Survey results are included in the department annual review.	TBD	Implement an annual staff survey to inform departmental goals. Encourage all employees to participate in the survey.	Not started.	Executive Director and Deputy Director/COO.
1.1.3. Draft and release an equitable and inclusive hiring and recruitment policy that includes learnings and feedback from staff survey and applicant barriers assessment. This policy must be vetted by the Racial Equity Leaders and any related working group.	Senior Leadership Team and Executive Director in consultation with DHR.	Policy is created, implemented, and reviewed annually to maximize results.	TBD	Create an equitable and inclusive hiring policy which incorporates learnings from the staff survey.	Not started.	Executive Director and Deputy Director/COO.

1.2. Strengthen recruitment and hiring strategies to attract and cultivate diverse candidates at all levels of the department.

¹ Department management will need to review all responses to see whether any of them qualify as EEO complaints.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION PLAN	STATUS	LEAD
<p>1.2.1. Develop a clear and expansive recruitment process that addresses most basic barriers to access to employment opportunities and stretches beyond existing outreach protocols to new and unexpected outlets and networks. Map and track outreach efforts.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Candidate pool is increasingly more diverse and referred from a variety of sources.</p>	<p>Prior to posting of job announcement and during open application period.</p>	<p>Collaborate with DHR to broaden outreach strategy, including promoting job postings via City’s social media accounts and sharing with diverse community groups through DHR’s Diversity Recruitment Team.</p> <p>Share job opportunities with staff, external contacts, and the public to widely promote the positions.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>1.2.2. Foster relationships with new and unexpected outlets, community-based organizations, BIPOC professional networks, re-entry programs, SFUSD and community college systems that could feed into open positions.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Recruitment contacts and networks are identified and solicited.</p> <p>Candidate pool is increasingly more diverse and referred from a variety of sources.</p>	<p>During open application period.</p>	<p>Continue to promote positions to diverse community-based organizations through DHR Diversity Recruitment Team’s outreach channels.</p> <p>Create a centralized list of outlets for recruitment.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>
<p>1.2.3. Review, simplify, and standardize job descriptions and minimum qualifications to remove any barriers to attracting a diverse candidate pool and those with diverse life, education, and professional experiences. Include multiple ways to apply to a position.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Reviews completed.</p> <p>Job descriptions are simplified and standardized.</p> <p>Multiple ways to apply are made available.</p>	<p>In development of job description prior to posting the job announcement.</p>	<p>Standardize all job descriptions with inclusive language.</p> <p>Provide information regarding job opportunities to potential candidates on the Commission’s website along with links to directly access DHR’s application portal.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>1.2.4. Interrogate necessity of minimum qualifications (MQs) that may disproportionately create racial inequities in hiring and recruitment. Consider the option of learning on the job or relevance of transferable skills. Remove unnecessary/outdated MQs for certain classifications to expedite hiring and allow for greater equity.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>An increase in applicant pool with more diverse life, education, and professional experiences.</p>	<p>In development of job description prior to posting the job announcement.</p>	<p>MQs are reviewed by department in assessing and requesting positions to be authorized. Standardized MQs as defined by DHR for job classifications are used in job postings.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>

<p>1.2.5. Review the need for supplemental questions. Does this job require the applicant to write well as a part of their job duties? If not, reconsider supplemental essay questions, unless grammar and other writing skills will not be considered.²</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>An increase in applicant pool with more diverse life, education, and professional experiences.</p>	<p>In development of job description prior to posting the job announcement.</p>	<p>Review role of supplemental questions as a part of recruitment planning for each job posting.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>1.2.6. Reject the practice of “degree inflation” which exacerbates racial disparities in educational and wealth attainment by requiring a four-year college degree for jobs that previously did not. Be specific about the hard and soft skills needed for the role.</p>	<p>Senior Leadership Team and Executive Director review highly desirable qualifications.</p>	<p>An increase in applicant pool with more diverse life, education, and professional experiences.</p>	<p>In development of job description prior to posting the job announcement.</p>	<p>Departmental role is limited with regard to MQs, which are established across job classifications citywide by DHR. Standardized MQs as defined by DHR for job classifications are used in job postings, which specify educational requirements.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>1.2.7. Require outside recruiters to comply with departmental standards for equitable and inclusive hiring to ensure the production of a diverse and qualified candidate pool. Use outside recruiters who bring an equity lens and culturally-competent skills to their work.</p>	<p>Not applicable.</p>	<p>Candidate pool is increasingly more diverse and referred from a variety of sources.</p>	<p>Not applicable.</p>	<p>Department does not use external recruiters for recruitment of staff positions. ETH recruitments are managed internally with support from DHR through a work order.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>

1.3. Invest in a diverse and equitable talent pool by formalizing robust internship, fellowship, pre-apprenticeship and apprenticeship programs, and provide equal opportunity towards permanent employment.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
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² From <https://www.cityofmadison.com/civil-rights/documents/RESJEquitableHiringTool.docx>.

<p>1.3.1. Create, maintain, and develop internship stipends and paid fellowship opportunities. Be clear and upfront about the ability to fund internships and fellowships during the interview process.</p>	<p>Commission does not have an internship program.</p>	<p># of paid interns/fellows, increase annually or meets department needs/capacity</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>1.3.2. Identify and secure a minimum number of departmental summer placements and employee mentors for participants in the Mayor’s Opportunities for All program.</p>	<p>Commission does not have an internship program.</p>	<p># of Opportunities for All placements and mentors</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>1.3.3. Disrupt employment patterns relying on a ‘feeder model’ that consistently pulls candidates from the elite institutions and universities. Target local community colleges, trade schools, training programs, re-entry programs, public high schools, etc. e.g. SF Unified School District’s Career Pathways Program.</p>	<p>Commission does not have an internship program.</p>	<p>Internship/fellowship candidate pool is increasingly more diverse and referred from a variety of sources.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>1.3.4. Include opportunities to expand collective knowledge regarding diversity, equity, and inclusion.</p>	<p>Commission does not have an internship program.</p>	<p># of opportunities during internship/fellowship</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>1.3.5. Track and evaluate outcomes including reviewing the application process and resulting hires by race/ethnicity, to address any fallout due to bias. Collect constructive feedback of intern and fellowship experiences. Adjust programs accordingly.</p>	<p>Commission does not have an internship program.</p>	<p>Tracking system implemented. % of evaluations completed Internship/fellowship program updated before next cycle.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>	<p>Not applicable.</p>

1.4. Commit to standardized, transparent, and participatory recruiting and onboarding.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
1.4.1. Maintain a standardized and holistic interview process with structured interview questions.	Senior Leadership Team and Executive Director in consultation with DHR.	Standardized interview process with a set of inclusive interview questions.	Prior to scheduling interviews.	Standardize interview process and questions used for recruitment.	Ongoing.	Executive Director.
1.4.2. Ensure a diverse hiring panel for each interview.	Senior Leadership Team and Executive Director.	Demographic composition of panels. Increase in diverse interview panels.	Prior to scheduling interviews.	Assist hiring managers to assemble diverse panelists for interviews.	Ongoing.	Executive Director.
1.4.3. Train staff on conducting interviews, taking care to focus on implicit bias and equity. This includes staff involved in selecting interns and fellows.	Senior Leadership Team and Executive Director in consultation with DHR.	Interview panels will be increasingly more equitable, conversations regarding racial equity can be easily had.	Prior to development of job posting and scheduling of interviews.	Panelists are required to take Fairness in Hiring training before participating in the interviews. Panelists are also provided instructions regarding the interview process, interview preparations, timeline, scoring etc. Staff in supervisory classifications are required to complete Implicit Bias awareness training.	Ongoing.	Executive Director.
1.4.4. Adopt a tool to track application progress and provide assistance where needed through multiple means to reach more job seekers.	Senior Leadership Team and Executive Director with support from DHR.	Tool created and implemented. # of applicants increased Increased assistance to job seekers.	Prior to job posting and ongoing during application window.	City’s job application system is used to track progress on recruitment and application pool. DHR consultant assigned to the department through a general work order provides recruitment support and acts as the point of contact for job seekers.	Ongoing.	Executive Director.
1.4.5.	Senior Leadership Team and Executive Director.	Increase in internal staff applying for job openings.	At time of job posting.	Department’s job openings are posted on the Commission’s website, shared with all staff, and	Ongoing.	Executive Director.

Share and post all job openings internally. Abide by department’s RE Action Plan goals to create and streamline professional mobility.

announced publicly at Commission meetings and through meeting agenda materials.

<p>1.4.6. Decrease and close lags and long wait times in hiring, interviewing, and onboarding processes that can cause delays in service provision and potential economic harm to interested applicants.</p>	<p>Senior Leadership Team and Executive Director with support from DHR.</p>	<p>Hiring, interviewing, and onboarding processes standardized. Lag times/wait times.</p>	<p>During recruitment and onboarding.</p>	<p>Actively manage recruitment timelines to promptly address bottlenecks in the hiring process to minimize delays. Collaborate with DHR to identify causes of delays in the exam-based recruitment process and take necessary steps to minimize delays where feasible. Plan tasks in advance to ensure smooth and consistent onboarding experience for all new employees.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>1.4.7. Formalize and standardize the onboarding process for full-time and part-time staff, volunteers, interns, fellows, and freelancers.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p>All new hires are processed similarly regardless of position.</p>	<p>During onboarding.</p>	<p>Developed a standardized onboarding process for new employees, which continues to be improved and implemented ongoingly.</p>	<p>Ongoing.</p>	<p>Deputy Director/COO.</p>
<p>1.4.8. Expand upon the default Certification Rule of Three Scores. For example, expanded to the Rule of Ten or more.</p>	<p>Senior Leadership Team and Executive Director with support from DHR.</p>	<p>Increase in number of diverse candidate pools. Overall faster hiring times.</p>	<p>As hiring plans are developed.</p>	<p>Review and discuss with DHR as part of exam-based position recruitment.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>

1.5. Additional Hiring and Recruitment-Related Goals

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
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1.5.1 Track and evaluate Hiring Plan outcomes including reviewing the application process and resulting hires, including by race/ethnicity.	Senior Leadership Team and Executive Director in consultation with DHR.	Departmental review of hiring processes and outcomes is completed.	At the end of recruitment.	Assess hiring outcomes and consult with DHR on the findings to inform recruitment process. Review demographic information for candidate pool when made available by DHR to evaluate the impact of RE hiring and recruitment initiatives.	Ongoing.	Executive Director.
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2. RETENTION AND PROMOTION

Our Workforce is Our Largest Asset. Retaining a strong workforce means supporting our employees holistically to ensure that they are affirmed, in and out of the office. A competitive salary, inclusive benefits and opportunities for advancement ensure that our workforce can sustain themselves and their immediate family, and oftentimes, due to the wealth gap and the effects of systemic racism, their

extended families and friends. A clear and intentional path to promotion addresses barriers to upward mobility that systemically face underrepresented employees. Lastly, acknowledging and responding to any potential inequitable impacts of the COVID-19 pandemic on frontline City workers will be essential.

DEPARTMENT GOAL

What is the department’s overall goal on Retention and Promotion?

The Ethics Commission is committed to promoting an inclusive work environment and employee retention and promotion practices in alignment with overall departmental RE goals and that support, develop, and equitably advance the unique knowledge, skills, and abilities of a diverse staff, including paths to promotional opportunities and leadership roles.

2.1. Ensure stronger protections for workers of color given anticipated COVID-19 related deployment, budget shortfalls, hiring freezes, layoffs, and furloughs.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
2.1.1.	Executive Leadership Team.	Deployment tracking mechanism implemented.	During DSW deployments.	This information was tracked and reviewed during DSW deployments in FY21. As the Commission’s	Completed.	Executive Director.

Track deployment and the given functions of all DSW workers (frontline work and remote work) deployed throughout the period, disaggregated by race/ethnicity, age, gender, classification, pay, union, tenure with the City, accommodations/disability, etc. Compare aforementioned demographics of employees who volunteered through the DHR DSW survey with those who were requested/deployed.³

Demographic data reviewed.

physical office was closed during the shelter-in-place health order, no staff members were required to work onsite on a regular schedule during the pandemic. DSW assignments were made by DHR for ETH staff to work with other departments. Since the start of the COVID-19 shelter-in-place public health order in March 2020, more than one-third of the Ethics Commission’s 25-member staff fulfilled DSW duty. They collectively provided more than 570 days of emergency response coverage, or over 4,500 hours, including three employees deployed on extended assignments in FY21.

<p>2.1.2. Conduct internal budget analysis with racial equity lens and DSW data, to inform current and future staffing needs. Develop strategies to prevent inequities in layoffs and furloughs.</p>	<p>Executive Leadership Team.</p>	<p>Budget analysis completed. Strategies developed and published.</p>	<p>Annually by Feb 21.</p>	<p>Staffing needs are regularly evaluated to inform the Annual Budget request submission process.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>2.1.3. Ensure that frontline DSW workers have access to necessary PPE to complete their job function, including, but not limited to, masks, gloves, gowns, and access to hand washing and sanitizing materials.</p>	<p>Executive Leadership Team.</p>	<p>PPE access protocol established. DSW workers have an increased awareness of PPE access protocol.</p>	<p>During DSW deployments.</p>	<p>As the Commission’s physical office was closed during the COVID-19 shelter-in-place health order, no staff members were required to work onsite on a regular schedule during the pandemic. Necessary PPE were made available to staff for any intermittent onsite visits per City’s health and safety guidelines. Information regarding PPE availability and department’s health and safety protocols were shared with all staff.</p>	<p>Completed.</p>	<p>Executive Director.</p>
<p>2.1.4. Offer and clarify additional benefits for compensation, paid sick leave, and flex time for deployed workers.</p>	<p>Executive Leadership Team as advised on city policy by DHR.</p>	<p>Compensation, paid sick leave, and flex time benefits assessed and easily accessed.</p>	<p>During DSW deployments.</p>	<p>COVID-19 related communications from DHR and CCC, which included information regarding benefits, were shared among all staff.</p>	<p>Completed.</p>	<p>Executive Director.</p>

³ Disaggregation is in line with Department of Human Resources standard (rule of 10 or less).

		Increased employee awareness of additional benefits.				
2.1.5. Consider DSW caretaking and safe transportation constraints when making assignments to avoid additionally burdening workers.e.g. graveyard shifts	Executive Leadership Team as advised on city policy by DHR.	Caretaking and safe transportation sections included in DSW deployment protocol.	During DSW deployments.	As the Commission’s physical office was closed during the COVID-19 shelter-in-place health order, no staff members were required to work onsite on a regular schedule during the pandemic. DSW assignments were made by DHR for ETH staff to work with other departments. Any requests or concerns from staff were considered per DHR’s guidance.	Completed.	Executive Director.

2.2. Ensure salaries and benefits allow for a dignified livelihood, especially for people of color and women.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
2.2.1. Conduct annual internal reviews of salary standards against industry standards to ensure parity.	Executive Leadership Team.	Demographic data analyzed as part of annual salary review. Pay inequities are reduced and aligned annually after salary data is reviewed.	During recruitment and annual budget submission.	Assess job classifications of positions as a part of the Annual Budget request submission process to ensure the right level and salary range for the duties of the positions. Conduct salary review of filled staff positions prior to offer of employment for new staff to apply a consistent approach department-wide for salary placement within City-approved salary range for job classifications.	Ongoing.	Executive Director and Deputy Director/COO.
2.2.2. Conduct annual internal reviews of the parity of department benefits, reviewing and enhancing existing policies. e.g. parental leave policy, short-term disability, etc.	Executive Leadership Team.	Benefits provided are annually improved.	As needed.	Citywide HR-related policies are established by DHR. Continue to abide by relevant provisions of MOUs and policies issued by DHR to administer benefits, leaves, etc. to employees in a consistent manner.	Ongoing.	Executive Director and Deputy Director/COO.

Review and revise any department-specific policies to ensure that they are applied equitably.

<p>2.2.3. Review the paid time off (PTO) policy annually and enhance it to value all religious and cultural holidays.</p>	<p>Executive Leadership Team.</p>	<p>PTO policy is annually improved.</p>	<p>TBD</p>	<p>Citywide HR-related policies are established by DHR. Continue to abide by relevant provisions of MOUs and policies issued by DHR to administer PTO policy consistently.</p> <p>Review PTO approvals to understand if there is any disparity by race/ethnicity.</p>	<p>Not started.</p>	<p>Executive Director and Deputy Director/COO.</p>
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2.3. Create paths to promotion that are transparent and work to advance equity.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
<p>2.3.1. Determine standard factors considered for raises and promotions. Make this information available to staff.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Increase in knowledge about raises and promotions.</p>	<p>Ongoing.</p>	<p>Raises and promotions are set in accordance with DHR Classification and Compensation scale in accordance with union negotiation and MOUs.</p> <p>Ensure that employees receive their compensation step increase as scheduled.</p> <p>Assess and determine professional growth opportunities for staff within performance evaluations, including based on feedback from staff about professional development interests.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>
<p>2.3.2. Develop a formal and transparent process for raises and promotions.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Increase in staff feedback about promotion and raise process.</p>	<p>Ongoing.</p>	<p>Raises and promotions are set in accordance with DHR Classification and Compensation scale in accordance with union negotiation and MOUs.</p> <p>Review job classifications as a part of the Annual Budget submission process to request new</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>

positions and reclassify existing positions to meet evolving business needs and provide advancement opportunities for staff.

Post job openings on the Commission’s website and share postings with all staff.

<p>2.3.3. Develop a process for “acting/interim” roles to avoid staff working these roles for extended periods of time without compensation.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Acting/interim staff process included in internal policies and processes. Increased awareness of process for acting/interim staff.</p>	<p>Implemented when acting/interim assignments are needed.</p>	<p>Acting roles are assigned and compensated as per applicable MOUs.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>
<p>2.3.4. Internally investigate key classifications with current “drop-offs” in employee diversity, such as Administrative Analyst Series (182X series). Set forth strategies and training opportunities to support employee development to achieve mobility.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Reversal of diversity drop-offs in 182x classifications.</p>	<p>TBD</p>	<p>Analyze demographics of all classifications and identify those with the least diversity. Strategize on strengthening professional development opportunities to support diversity across classifications.</p>	<p>Not started.</p>	<p>Executive Director and Deputy Director/COO.</p>
<p>2.3.5. Revisit classifications that “dead end” employees, to create a clear upward path for continued employment opportunities with the City.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Identify “dead end” classification and revise.</p>	<p>Annually.</p>	<p>Review job classifications as a part of the Annual Budget submission process to request new positions and reclassify exiting positions to meet evolving business needs and provide advancement opportunities for staff.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>

2.4. Additional Retention and Promotion-Related Goal

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
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<p>2.4.1 Encourage staff participation in education and professional development opportunities to help develop their career goals.</p>	<p>All Staff.</p>	<p>Identify and share list of applicable education opportunities for City employees (e.g, DHR University; bargaining unit-specific provisions; tuition reimbursement).</p>	<p>Annually.</p>	<p>Implement through onboarding, annual goal setting, and performance review processes.</p>	<p>Ongoing.</p>	<p>Executive Director; Deputy Director/COO.</p>
		<p>Remind Staff of available education programs.</p>				

3. DISCIPLINE AND SEPARATION

The Path to Termination is Filled with Bias. Managerial practices that surround employee evaluation, monitoring, warning, suspensions, and termination must be applied equally. Employees of color, especially Black and Latinx employees, receive extra scrutiny from supervisors leading to worse performance reviews, missed promotion opportunities, and, oftentimes, termination.¹ This additional scrutiny is a result of a biased feedback loop in which Black and Latinx employees are often seen as less skilled because of consistent or prolonged unemployment. This cycle must be stopped. Higher rates of

corrective action and discipline negatively impacts a department’s ability to successfully recruit, retain, and engage employees of color, specifically Black and Latinx employees.² Thus, supervisors should be aware of their own biases, evaluations and reviews must be standardized, and, most importantly, managers should always center the needs of their employees. Job expectations should be reasonable, clear, and gladly supplemented with opportunities for upskilling.

¹ Gillian White, Black Workers Really Do Need to Be Twice as Good, The Atlantic (Oct. 7, 2015) <https://www.theatlantic.com/business/archive/2015/10/why-black-workers-really-do-need-to-be-twice-as-good/409276/>.

² Department of Human Resources, CCSF, 2020 Annual Workforce Report, Phase I 11 (Mar. 2020).

DEPARTMENT GOAL

What is the department’s overall goal on Discipline and Separation?

In actively managing employee performance and applying progressive discipline when warranted, the Ethics Commission seeks to ensure both individual and organizational accountability and achievement. Aligned with the department’s overall racial equity goals, the Commission’s administrative and personnel management practices are designed to accomplish that aim fairly and equitably, through clear expectations, regular feedback, and identified pathways for improvement, so that the service we provide is consistent with the values we express and the standards to which we hold others accountable.

3.1. Create a clear, equitable, and accountable protocol for disciplinary actions.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
3.1.1. Track all types of disciplinary actions and analyze subsequent disaggregated data. Pay special attention to data pointing to biases against staff of color.	Executive leadership team in consultation with DHR.	Create tracking mechanism. Analyze data annually. Increase accountability in disciplinary actions.	At least annually.	After receiving disciplinary action data, conduct analysis and evaluate results as they relate to staff of color. Data includes Performance Improvement Plans (PIP), suspensions, etc. After receiving separation data, conduct analysis and evaluate results as they relate to staff of color. Separation data would include dismissals, probation release for disciplinary reasons, demotions, etc.	Ongoing.	Executive Director.
3.1.2. Train supervisors on bias and equitable and compassionate discipline and separation.	Executive leadership team in consultation with DHR.	# of trainings completed annually	Annually.	Supervisors are required to complete Implicit Bias awareness training. Supervisors are also asked to complete City’s 24-PLUS training for Supervisors & Managers, which includes training on disciplinary processes, and other available City-provided leadership trainings which address effective communication and staff coaching.	Ongoing.	Executive Director.
3.1.3. Implement alternative dispute resolution opportunities, such as mediation, to resolve interpersonal issues, thus reducing the need for separation or traditional disciplinary measures. Encourage a “scaled back” discipline process.	Executive leadership team in consultation with DHR.	Human resources trained on alternative dispute resolution.	TBD	Consult DHR in assessing opportunities to implement alternate dispute resolution.	Not started.	Executive Director.
3.1.4. Standardize discipline procedures and corrective actions to ensure that all employees receive the same level of discipline for a particular policy.	Executive leadership team in consultation with DHR.	Reduction of racial disparities in disciplinary actions.	Ongoing.	Standardize procedures to ensure that any discipline received is the same level across similarly situated employees for a particular policy.	Ongoing.	Executive Director.

Track and analyze data on discipline procedures and corrective actions to determine if there are racial disparities in any of those actions.

4. DIVERSE AND EQUITABLE LEADERSHIP

An Equitable Workplace Starts with Diverse Leadership. Fostering an organizational culture of inclusion and belonging means seeing oneself in every aspect of the workplace. When white men make up 85% of all senior executive and board members in America, it is difficult to imagine how women and people of color can see themselves in a leadership position.¹ In general, a department’s leadership determines multiple aspects of the workforce, who gets hired, where the money goes, what projects are greenlit.

Thus, it is more likely that a diverse leadership that carries shared values with their staff, will better uplift the staff. In fact, all employees, both white and employees of color, benefit from a people of color-led department.² Even the community will benefit because a diverse leadership will be better connected with the community, thus being able to create far more robust and innovative ways to support them.

¹ Laura Morgan Roberts & Anthony J. Mayo, Toward a Racially Just Workplace, Harvard Business Review (2019) <https://hbr.org/cover-story/2019/11/toward-a-racially-just-workplace>.

² Race to Lead, Race to Lead Revisited: Obstacles and Opportunities in Addressing the Nonprofit Racial Leadership Gap.

DEPARTMENT GOAL

What is the department’s overall goal on Diverse and Equitable Leadership?

The Ethics Commission seeks to ensure that its staff leadership reflects and fully engages the diversity of the Commission and the communities it serves in alignment with its overall departmental racial equity goals.

4.1. Commit to developing a diverse and equitable leadership that will foster a culture of inclusion and belonging.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
4.1.1.	Executive Leadership Team.	% increase in diverse leadership	TBD	Develop an inclusive hiring policy incorporating learnings from the staff survey as identified in 1.1.3	Not started.	Executive Director.

Adhere to a hiring and recruitment policy that generally aligns with the citywide racial equity framework and the departmental RE Action Plan.

4.1.2. Commit to ongoing racial equity training and development for leadership.	Senior Leadership Team and Executive Director	# of training & development completed by leadership per quarter	Annually.	Ensure that leadership and staff complete City required training related to racial equity. Identify additional training opportunities as needed.	Ongoing.	Executive Director and Deputy Director/COO.
4.1.3. Incorporate senior leadership demographics in the department annual report and/or other public-facing reporting.	Executive Director.	Senior leadership demographic included in the department annual report.	Annually.	Published as part of Annual Report.	Ongoing.	Executive Director.
4.1.4. Implement a simple process to submit anonymous input to senior leadership. Develop a plan to respond to such input. ⁴	Senior Leadership Team and Executive Director.	% of staff is aware of the process	TBD	Develop a process for employees to provide anonymous feedback and for leadership to respond to the feedback. Increase awareness of this process among staff.	Not started.	Executive Director and Deputy Director/COO.

5. MOBILITY AND PROFESSIONAL DEVELOPMENT

When an Employee’s Needs are Met, so are the Department’s Needs. Our City workforce should center the needs of our employees. In order to do that, it is important to recognize having both the hard and soft skills needed to perform certain tasks is a form of privilege. It is equally important to realize that employees of color are more likely to repeatedly prove their capabilities rather than being evaluated by

their expected potential.¹ By intentionally investing in the specific professional development of each staff, the department can uplift an employee’s journey to developing new skills rather than scrutinizing for a lack of skills. In essence, professional development through mentorship, training, and workshops create an internal pipeline retaining employees to one day fulfill leadership positions.

¹ Evelyn Carter, *Restructure Your Organization to Actually Advance Racial Justice*, Harvard Business Review (Jun. 22, 2020) <https://hbr.org/2020/06/restructure-your-organization-to-actually-advance-racial-justice>.

DEPARTMENT GOAL

What is the department’s overall goal on Mobility and Professional Development?

⁴ Department management will need to review all responses to see whether any of them qualify as EEO complaints.

The Ethics Commission seeks to provide meaningful, practical, and impactful support for the development, mobility, and advancement of its staff aligned with the department’s overall racial equity goals.

5.1. Offer professional and skill development opportunities that center individual goals first, then organizational needs.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION PLAN	STATUS	LEAD
5.1.1. Require formal training for all staff regardless of full/part-time status or seniority.	Senior Leadership Team and Executive Director.	# of available professional development opportunity # of completed training	Ongoing.	New employees are provided structured orientation training during onboarding. Supervisors are asked to develop a training plan with their employees as part of annual performance review and goal setting process. Employees are provided training options that apply to their roles and are also encouraged to self-identify trainings. Trainings completed by staff are tracked to ensure that opportunities are made available to all staff.	Ongoing.	Executive Director and Deputy Director/COO.
5.1.2. Formalize a process for staff to attend conferences. Make clear processes and protocols for reimbursement, stipends, and payments.	Senior Leadership Team and Executive Director.	Process formalized. Process shared with all staff. # of conferences attended.	Annually.	Provide opportunities for staff to attend conferences based on the needs of their roles and funding availability. Share information regarding City’s accounting and reimbursement policies.	Ongoing.	Executive Director and Deputy Director/COO.
5.1.3. Offer opportunities for continual and extended learning. Include in the annual budget.	Senior Leadership Team and Executive Director.	# of staff enrolling and completing extended learning \$ dedicated to extended learning annually	Annually.	Implement as part of annual performance review subject to budget approval. Review in development of annual budget.	Ongoing.	Executive Director.

<p>5.1.4. Encourage participation in professional development by sharing external opportunities that are related to the department’s missions and goals. Provide financial support for paid opportunities.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p># of staff participating in outside events or opportunities</p>	<p>Annually.</p>	<p>Implement as part of annual performance review subject to budget approval. Review in development of annual budget.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>5.1.5. Track professional and skill development and assess annually, specifically looking to target underrepresented staff of color.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p>Adopt a tracking system, analyze annually. # of staff of color utilizing professional development</p>	<p>Annually.</p>	<p>Trainings completed by staff are tracked to ensure that opportunities are made available to all staff.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>

5.2. Encourage collaboration between staff and supervisors that are consistent and thoughtful.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION PLAN	STATUS	LEAD
<p>5.2.1. Develop an annual performance evaluation for all staff, part-time and full-time. Highlight advancement opportunities.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p>Bi-annual performance evaluation program to all staff.</p>	<p>Annually.</p>	<p>Performance Plan and Appraisal Review (PPAR) Process was launched in 2017. Over the last few years, the PPAR process was on hold due to organizational bandwidth constraints. This process will be resumed in the coming year. Include in the performance reviews discussions on professional development and training plan for the upcoming year.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>5.2.2. Create a mentorship program between senior and junior level staff.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p># of mentorship programs per year # of mentorship programs per year # of meetings per program cycle</p>	<p>Ongoing.</p>	<p>Promote an organizational culture of knowledge-sharing by providing opportunities for employees to learn from senior and longer-tenured staff through onboarding trainings and project specific trainings.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>

Gather feedback from staff to identify opportunities to expand mentoring.

5.3. Ensure staff needs are centered and timely met in order to perform and excel at their jobs.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
<p>5.3.1. Create a process where staff can submit accommodation requests to the department’s administration. The overall timeline process should be transparent and easily accessible.</p>	<p>Senior Leadership Team and Executive Director in consultation with DHR.</p>	<p>Process developed. % of staff aware of accommodation process # of accommodations made increased</p>	<p>Ongoing.</p>	<p>Accommodation requests are received and evaluated by supervisors and Executive Director in consultation with DHR per City policies. Reminder information to be provided to all staff to enhance transparency and accessibility of process.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>5.3.2. Incorporate an assessment of staff needs into the staff performance evaluation process.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p>Accommodations discussed and recorded during bi-annual performance evaluation process.</p>	<p>At least twice annually.</p>	<p>Performance Plan and Appraisal Review (PPAR) Process was launched in 2017. Over the last few years, the PPAR process was on hold due to organizational bandwidth constraints. This process will be resumed in the coming year, where an assessment of staff needs will be incorporated.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>
<p>5.3.3. Assign spaces for staff to take breaks and/or be in community with one another (e.g., department celebration, affinity groups).</p>	<p>Executive Leadership Team.</p>	<p>Improvement in overall staff mental health, increase in staff feedback.</p>	<p>Ongoing.</p>	<p>The Commission has designated conference/meeting rooms which can be used as collaboration spaces or break rooms as needed. The Commission’s physical office has space constraints which limit its ability to provide-additional spaces for breaks.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>
<p>5.3.4. Set up processes and open communication channels so management is available to respond to employees’ non-work-related needs that</p>	<p>Senior Leadership Team and Executive Director</p>	<p>Increase in staff awareness of accommodations.</p>	<p>Ongoing.</p>	<p>Staff communicates with supervisor and/or Executive Director regarding non-work-related needs. Staff can also directly communicate with department’s assigned DHR consultant as needed.</p>	<p>Ongoing.</p>	<p>Executive Director.</p>

contribute to overall work quality. Center the most vulnerable individuals. E.g. transportation stipends, exercise stipends, childcare, etc.

in consultation with DHR.

5.3.5. Respect religious and cultural practices of employees.	Executive Leadership Team.	Improvement in overall staff mental health.	TBD	Expectation to be added to general performance expectations of all staff in annual goal setting and performance review documents.	Not started.	Executive Director.
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5.4. Additional Mobility and Professional Development-Related Goals

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
5.4.1 Foster an organizational culture of inclusion and belonging by assessing professional and skill development opportunities through a racial equity lens to support paths to promotional opportunities and leadership roles.	Senior Leadership Team and Executive Director.	# and type of available professional development opportunities # and type of completed trainings	At least annually.	Review training and professional development opportunities identified and implemented, along with demographic data. Identify individual professional development plans as part of annual performance and goal setting discussions. Review in preparation for development of Annual Budget submission.	Ongoing.	Executive Director.

6. ORGANIZATIONAL CULTURE OF INCLUSION AND BELONGING

Growing a Diverse Workforce is Just the First Step. Employees must feel welcomed and included at every stage of their employment. Racial homogeneity is not only found in hiring and recruiting, it permeates throughout organizational culture, policies, and procedures. It also can take form as coded, traditional standards, such as “professionalism,” that ultimately centers whiteness.¹ This factor takes an immense

mental health toll on underrepresented employees who do not feel like they belong. Departments must actively work to create a culture of inclusion and commit to ongoing assessment to uncover gaps in policies and procedures that create a culture of othering. Changes in organizational culture starts and continues with the needs of the employee. These needs are discovered by fostering intentional

relationships with underrepresented employees, specifically women, trans employees, Black employees, indigenous employees, employees of color, and employees living with disabilities.

¹ Aysa Gray, *The Bias of ‘Professionalism’ Standards*, Stanford Social Innovation Review (Jun. 4, 2019) https://ssir.org/articles/entry/the_bias_of_professionalism_standards.

DEPARTMENT GOAL

What is the department’s overall goal on Organizational Culture of Inclusion and Belonging?

In alignment with its overall racial equity goals, the Ethics Commission seeks to be a dynamic and inclusive workplace of choice that attracts and retains high performing and collaborative teams that fully engage individuals with diverse experiences, perspectives, and talents to support the Commission’s unique role in promoting broad, fair, and equal participation in city government.

6.1. Foster an intentional organizational culture that is committed to inclusion and belonging.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION PLAN	STATUS	LEAD
6.1.1. Ensure that the department’s mission, policies, and procedures reflect an ongoing commitment to an organizational culture of inclusion and belonging.	Executive Leadership Team.	Department mission, policies, and procedures are updated and available.	TBD	Review department’s mission, policies, and procedures to incorporate commitment to racial equity.	Not started.	Executive Director and Deputy Director/COO.
6.1.2. Create a Racial Equity Team consisting of Racial Equity Leads committed to keeping the department accountable for reaching its RE Action Plan goals.	TBD	Regular scheduled meetings with RE Team to implement RE Action Plan.	TBD	Assign staff to help further develop and refine the department’s racial equity action plan.	Not started.	Executive Director and Deputy Director/COO.
6.1.3. Develop a RE Action Plan that is updated regularly and available to the public.	Executive Leadership Team. Commission.	RE Action Plan is published on department website.	Ongoing.	RE Plan V1 was posted on Commission website in Dec 2020. Revisions will continue to be posted.	Ongoing.	Executive Director.

6.1.4. Regularly report to staff, board, and commissioners on RE Action Plan updates.	Executive Leadership Team. Commission.	Ongoing reporting.	Ongoing.	Include updates as part of departmental reports.	Ongoing.	Executive Director.
6.1.5. Support and provide spaces for affinity groups, prioritizing historically marginalized peoples.	Senior Leadership Team and Executive Director.	Increase in staff engagement.	TBD	Create spaces to facilitate discussions and information-sharing among staff to help foster a culture that values diversity, equity, inclusivity, and connection building.	Not started.	Executive Director and Deputy Director/COO.
6.1.6. Have staff participate in trainings, conferences, and discussions that promote a wider understanding of racial equity.	Senior Leadership Team and Executive Director.	# of training, conference, or discussion regarding diversity, equity, and inclusion completed by staff per quarter	TBD	Identify opportunities to promote a wider understanding of racial equity among staff.	Not started.	Executive Director.
6.1.7. Conduct an annual staff survey that assesses the department’s commitment to an organizational culture of inclusion and belonging.	Senior Leadership Team and Executive Director in consultation with DHR.	Annual survey with disaggregated data and feedback.	TBD	Implement an annual staff survey to understand organizational culture experienced by staff. Encourage all employees to participate in the survey.	Not started.	Executive Director and Deputy Director/COO.
6.1.8. Ensure that all art, decor, and design where staff work daily reflect racial and social diversity.	TBD	Increase in staff engagement.	As needed.	Evaluate during future changes to office space.	Not started.	TBD

6.2. Develop internal communication processes and procedures that promote equity.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION PLAN	STATUS	LEAD
6.2.1. Regularly update departmental mailing lists to ensure that all staff receive communications.	Senior Leadership Team and Executive Director.	Increase in staff feedback, participation, and response to communications.	Ongoing.	Implemented as part of new employee onboarding process.	Ongoing.	Executive Director and Deputy Director/COO.

6.2.2. Ensure that all staff meetings center a diverse range of speakers and inclusive topics while offering space for staff engagement. Be transparent about the speakers and topics.	All Staff.	Ongoing staff participation and feedback.	Ongoing.	To be implemented with staff feedback.	Not started.	Executive Director and Deputy Director/COO.
6.2.3. Create, maintain, and make available a space, physical and/or digital, for staff to share information.	Senior Leadership Team and Executive Director.	Ongoing staff participation and feedback.	Ongoing.	Staff can share information through staff meetings, email, SharePoint, Teams messaging, and Teams online meetings.	Ongoing.	Director of Technology Services; and Deputy Director/COO.

6.3. Improve both physical and digital spaces to meet or exceed accessibility standards.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
6.3.1. Create an accessibility protocol that is utilized across all events, communications, and departmental functions.	Senior Leadership Team and Executive Director.	Protocol distributed internally and with any outward-facing interactions.	Ongoing.	<p>Include accessibility information in the Commission meeting materials.</p> <p>Expand accessibility features in the department’s website per City’s requirements depending on budget availability.</p> <p>Provide accessibility services to visitors to the office.</p>	In progress.	Executive Director and Deputy Director/COO.
6.3.2. Evaluate and improve on all physical spaces to meet or exceed accessibility standards taking into account staff and visitors with disabilities, seniors, and families. e.g. elevator access, ramps, lactation rooms, scent-free cleaning products, gathering spaces, etc.	Senior Leadership Team and Executive Director.	<p>A plan for physical space improvement.</p> <p>\$ funding secured</p> <p>Successful implementation.</p>	Ongoing.	Ethics Commission office is located in a shared building facility that is not managed by the department. Accessibility standards were implemented by ETH as part of office space re-design in 2018.	Ongoing.	Executive Director and Deputy Director/COO.

Accessibility requirements and improvements to physical spaces will continue to be evaluated in future as needed.

<p>6.3.3. Evaluate and improve on all digital functions and communications to meet or exceed accessibility standards taking into account staff and visitors with disabilities. e.g. plain-text messages, recordings with captions, accommodations for blind or low vision individuals, accommodations for Deaf people, etc.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p>A plan for digital improvement. \$ funding secured Successful implementation.</p>	<p>TBD</p>	<p>Continue to provide digital tools and services to support a hybrid work model. Identify and implement improvements to the website to enhance accessibility per City’s requirements depending on budget availability. Identify other opportunities to improve the Commission's digital systems for accessibility where feasible.</p>	<p>Ongoing.</p>	<p>Director of Technology Services; and Deputy Director/COO.</p>
<p>6.3.4. Invest in translation services.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p># Increase in translated materials</p>	<p>TBD</p>	<p>Identify materials to be translated for the public and procure services to produce translated versions.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>
<p>6.3.5. Encourage individual forms of inclusive identity expression. e.g. honoring gender pronouns, relaxing or modifying dress code, etc.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p>Increase in staff using inclusive identity expression, second nature.</p>	<p>TBD</p>	<p>Provide information and resources to staff on use of gender neutral and inclusive terms to build an inclusive work environment. Promote inclusivity of various intersecting identities.</p>	<p>Not started.</p>	<p>Executive Director and Deputy Director/COO.</p>
<p>6.3.6. Bring accessibility information and accommodations to the forefront rather than offering it upon request. Accommodations can benefit other people besides the initial targeted group.</p>	<p>Senior Leadership Team and Executive Director.</p>	<p>Accommodations information infused throughout department touchpoints (e.g., website, event announcements). Provide closed-captioning by default. Increased digital equity (e.g., access) for all employees.</p>	<p>TBD</p>	<p>Ensure accessibility information is always offered or communicated to individuals interacting with the departments.</p>	<p>Not started.</p>	<p>Executive Director and Deputy Director/COO.</p>

6.4. Expand the internal culture of belonging by fostering relationships with the external communities the department serves.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
<p>6.4.1. Incorporate a process to gather community feedback on projects, events, and communications that involve or will impact the community.</p>	<p>Senior Leadership Team and Executive Director</p>	<p>Community will have an impact on all department projects.</p>	<p>Ongoing.</p>	<p>Commission receives public comment at its monthly meetings, and staff conduct follow up with members of the public regarding feedback received.</p> <p>Commission publicly notices proposed regulation changes before they are made, to invite public feedback. It seeks input on policy initiatives via Interested Persons meetings. Staff also meet with public stakeholders regularly on policy matters.</p> <p>Commission also has authority to place ordinances on the ballot as measures for consideration by the voters, engaging them most directly in the policy making process.</p> <p>Public can provide feedback regarding the Commission’s online content and resources directly through the website.</p> <p>Identify additional ways to establish effective community feedback and engagement methods.</p>	<p>Ongoing.</p>	<p>Executive Director and Deputy Director/COO.</p>
<p>6.4.2. Find opportunities to invest into and support the communities the department serves.</p>	<p>Senior Leadership Team and Executive Director</p>	<p>Community will have an impact on all department projects.</p>	<p>TBD</p>	<p>Identify additional opportunities to support the communities the department serves.</p>	<p>Not started.</p>	<p>Executive Director and Deputy Director/COO.</p>

7. BOARDS AND COMMISSIONS

An Equitable Workforce Starts with Equitable Decision Making. For many departments, an equitable and diverse leadership does not stop with senior leadership positions. Decisions are also being made in boards and commissions. These seats must represent the community that the department serves. Bi-

laws that contain policies and language that perpetuate implicit bias must be revised. Seats must be accessible and available to employees of color. Policies and budget decisions made by Boards and Commissions must be assessed through a racial equity lens.

DEPARTMENT GOAL

What is the department’s overall goal on Boards and Commissions?

Members appointed to the Ethics Commission serve independently with a sworn responsibility to uphold the public trust. As stewards of that trust, Commissioners work impartially for the benefit of all San Franciscans to ensure that the laws it shapes, administers, and enforces are effective, equitable, and uphold the highest standards of governmental integrity and accountability.

7.1. Ensure a diverse and equitable board and commission members that match the community being served.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
7.1.1. Review and revise Bylaws to include inclusive language and align with the department’s RE Action Plan.	Executive Director and Commission.	Bylaws successfully updated.	TBD	Encourage Commission leadership to agendize the discussion. Draft and adopt inclusive language in revised Bylaws. Update website to reflect changes.	Not started.	Commission Chair.
7.1.2. Collect current board and/or commission demographic data and include in the department annual report.	Executive Director in consultation with DHR.	Collect board/commission demographic data as changes to Commission composition occur.	As needed per Commission appointments.	Request data from DHR and include in the Annual Report.	Ongoing.	Executive Director.

		Data included in annual report to promote racial and gender equity in board and/or commission members.	Annually.			
7.1.3. Have board/commission adopt a resolution around racial equity.	Executive Director and Commission.	Resolution adopted.	TBD	Encourage Commission leadership to agendize the discussion. Draft and adopt a racial equity resolution.	Not started.	Commission Chair.
7.1.4. Racial equity-related items are regularly agendized.	Executive Director and Commission.	# of policies and issues related to racial equity that are heard, reviewed and/or implemented	Ongoing.	Include as part of Executive Director reports.	Ongoing.	Executive Director and Commission Chair.
7.1.5. Expand ability for board/commission members to hear from diverse voices from a place of influence.	Executive Director and Commission	Participatory budgeting processes. Community advisory working groups. Issue-specific task forces	Ongoing.	Conduct public hearings on budget priorities and proposals to receive input from the public. Identify ways to introduce diverse voices on a recurring basis at meetings.	Ongoing.	Executive Director and Commission Chair.
7.1.6. Pass a resolution on a Ramaytush Ohlone Land Acknowledgement. ⁵	Executive Director and Commission.	Resolution adopted.	TBD	Encourage Commission leadership to adopt a resolution on Ramaytush Ohlone Land Acknowledgement.	Not started.	Commission Chair.
7.1.7. Incorporate Proposition C 2020 passage which removes the requirement of U.S. citizenship and voter registration for individuals to serve on city boards, commissions, and advisory bodies.	TBD	Greater racial and gender equity in board and/or commission members.	TBD	TBD	TBD	TBD
7.1.8. Adopt ORE racial equity assessment tools to inform decision-making of boards and commissions.	Executive Director and Commission.	# of policies passed with RE lens Budget equity completed.	TBD	Use racial equity lens as a tool to regularly inform Commission’s decision-making and policy development work.	TBD	Executive Director and Commission Chair.

⁵ <https://americanindianculturaldistrict.org/ramaytush-land-acknowledgement>

7.2. Safeguard members so they naturally feel welcomed and valued, not tokenized.

ACTIONS	RESOURCES COMMITTED	INDICATORS	TIMELINE	IMPLEMENTATION	STATUS	LEAD
<p>7.2.1. Determine a regular and standardized protocol for accommodation requests, centering people with disabilities, working people, parents, etc.e.g. ASL interpretation, video conferencing, food during meetings, translations, etc.</p>	<p>Executive Director and Commission.</p>	<p># of diverse board/commission members</p> <p>% of board/commission retention</p> <p>Implementation of inclusive protocols.</p>	<p>TBD</p>	<p>Reasonable accommodation requests for remote participation are administered through DHR’s process.</p> <p>Identify standardized protocols as needed.</p>	<p>Ongoing.</p>	<p>Commission Chair.</p>
<p>7.2.2. Commit to ongoing racial equity training being mindful of ongoing and current issues.</p>	<p>Commission.</p>	<p># of completed training per quarter</p> <p>Increased participation rate.</p>	<p>TBD</p>	<p>Participate in all required equity training programs.</p>	<p>Ongoing.</p>	<p>Commission Chair.</p>
<p>7.2.3. Develop a mentorship program between newer and more experienced board/commission members.</p>	<p>Commission.</p>	<p>Increased board/commission retention.</p> <p>Member experience satisfaction survey.</p>	<p>TBD</p>	<p>Encourage Commission leadership to agendize a discussion regarding mentorship program for new Commissioners.</p>	<p>Not started.</p>	<p>Commission Chair.</p>

APPENDIX A

VULNERABLE POPULATIONS ENGAGEMENT SURVEY

1. Which communities of color do you serve?

The Commission’s services are broadly available to the public. To date the Commission has not tracked information regarding the delivery of its services specifically to communities of color.

2. What other vulnerable groups/communities do you serve?

The Commission’s services are broadly available to the public. To date the Commission has not tracked information regarding the delivery of its services specifically to other vulnerable groups/communities.

Overview of Engagement Activities

3. Please describe your community engagement activities with individuals and groups in San Francisco’s communities of color.

The Commission’s community engagement historically has been broadly focused on engagement at its public meetings and through services it provides both online and at its physical office in Civic Center, as described below. To date the Commission has not tracked information regarding its public engagement activities specifically with communities of color.

- The Commission administers a partial public financing program for candidates for Mayor and the Board of Supervisors, which is designed to strengthen the accountability of candidates to the voters who elect them. Candidates who meet established criteria can qualify to receive limited amounts of public funds for their campaigns and can spend less time fundraising and more time discussing issues important to their constituents. By increasing the importance of relatively small, individual contributions in election campaigns, public financing systems help encourage new and diverse voices among candidates as well as those whom they are elected to represent.
- The Public can provide input on items appearing or not appearing on the agenda in connection with monthly Commission meetings. Staff conduct follow up with members of the public regarding feedback received.
- The Commission publicly notices proposed regulation changes before they are made, to invite public feedback.
- The Commission seeks input on policy initiatives via Interested Persons meetings. Staff also meet with public stakeholders regularly on policy matters to understand in greater depth the issues raised and to formulate Commission proposals that consider the feedback received.
- The Commission has authority to place ordinances on the ballot as measures for consideration by the voters, engaging them most directly in the policy making process.
- The Commission conducts public hearings on its budget priorities and proposals to receive input from the public to inform its programmatic and operational priorities.

- The Commission provides public disclosure information and other materials both online through its website and at its physical office in Civic Center. The Commission also provides records upon public's request.
- The Public can provide feedback directly through the Commission's website and subscribe to receive regular updates from the Commission via email.

4. Based on your work, what critical issues do these communities face?

Ensuring that City's decision-making systems and the Commission's public policy proposals and policy implementation, support equitable and fair outcomes.

5. Who are the community based organizations, leaders and/or groups within the vulnerable population(s) you serve? (Describe your engagement with these stakeholders)

To date the Commission has not tracked information regarding the delivery of its services specifically to vulnerable populations. The Commission's community engagement historically has been broadly focused on engagement at its public meetings and through services it provides both online and at its physical office in Civic Center. In Commission discussions about its proposed public policies and decision-making, participation has included representatives from non-profit community and civic and social services organizations. Staff conduct follow up with members of the public regarding feedback received at the Commission's public meetings. Staff also meet with public stakeholders regularly on policy matters to understand in greater depth the issues raised and to formulate Commission proposals that consider the feedback received.

Budget Considerations & Impacts

6. What is your Department's total annual budget for FY 20/21? Briefly describe how your Department generally decides upon its proposed budget allocations:

The Commission's annual approved operating budget for FY21 was \$4.72 million with authority for 25 staff positions. The Commission identifies its funding needs based on its organizational priorities and develops its budget proposal with input from the public. As part of a City Ordinance that took effect in 2020, departments are required to hold at least two public meetings concerning departmental budget priorities and proposals. Public can provide input in connection with Commission meetings when the budget discussions are agendaized.

7. What data, indicators and considerations were taken into account to maximize equity and support for vulnerable populations within your proposed Budget?

As the Commission has not tracked information regarding the delivery of its services specifically to vulnerable populations to date, it does not have related data or indicators. The Commission considers public input received as a part of its budget discussions.

8. Does your Department provide community participatory budgeting opportunities, or perform external outreach to get feedback on its budget decision-making processes?

Yes

9. If your Department does have a community participatory budgeting process, or perform external outreach to get feedback on budget decisions, please outline that process here:

As part of a City Ordinance that took effect in 2020, departments are required to hold a public meeting concerning departmental budget priorities at which members of the public may provide input prior to the department finalizing a proposed budget. The meeting must be held at least 15 days prior to the department's final approval of the agency's proposed budget. A second public hearing must be held no later than February 14 each year concerning the department's proposed budget to allow for public input prior to the agency's submission of their proposed budget. At that meeting, information provided must include information about the agency's divisions; budget totals and major changes including new or reduced initiatives and staffing changes; changes in service levels; projected salary savings; and how the agency is meeting budget instruction targets. The Commission conducts public hearings on its budget priorities and proposals at its Commission meetings.

10. What is your largest projected expenditure? Please go beyond listing a line item and be specific and explanatory.

The Ethics Commission's budget is comprised of two main components: an operating budget and the Election Campaign Fund. The Fund is established in the City's Campaign Finance Reform Ordinance (CFRO). Under CFRO, the Fund is capped at a maximum of \$7 million. Allocations to the Fund are based on a formula of \$2.75 per resident, unless the Fund has already reached its maximum. Depending on the elections held in a fiscal year and the level of participation from candidates in the Public Financing program, public disbursements from the Election Campaign Fund could be the largest expenditure for the department. Under the Commission's operating budget, Salaries and Benefits represent its largest expenditure.

11. Beyond salaries and benefits, what is your largest projected expenditure? Please go beyond listing a line item and be specific and explanatory.

The largest expenditure in FY21 operating budget beyond Salaries & Benefits is for rent paid (\$156,986) to the City's Real Estate Department for Commission's office space.

12. What is your second largest projected expenditure? Please go beyond listing a line item and be specific and explanatory.

The second largest expenditure in FY21 operating budget beyond Salaries & Benefits is for NetFile systems consulting services (\$117,000) to support the ongoing maintenance of the Commission's public disclosure systems.

13. What is your lowest projected expenditure? Please go beyond listing a line item and be specific and explanatory.

The lowest expenditure in FY21 operating budget is for Non-Air Travel expenses (\$450) to reimburse staff for any local transportation for Commission-related work to the extent allowed per City's accounting policies.

14. What percent and dollar amount of your overall budget supports the vulnerable population(s) you serve?

To date the Commission has not tracked information regarding the budget allocation for the delivery of its services specifically to vulnerable populations.

15. What are the recurring funding gaps or limitations in your overall budget that could inhibit your Department’s ability to advance equity?

Historically, the Commission has not had the staffing levels to fully support its voter mandate. The Commission has also not been able to fill vacant positions timely due to insufficient resources to dedicate solely to its recruitment and hiring processes. As a part of its FY21 budget proposal, the Commission requested authority and funding to create a new *Director of HR, Finance, and Operations* position necessary to assume day to day responsibility for a broad range of departmental management duties that are essential to direct and perform critical needs in the areas of human resources, budget development, financial oversight, and related departmental operations. The Commission’s request was not approved, however, and the department has continued to be resource-constrained in this area, including its ability to allocate dedicated resources to focus on evaluating the impact of its operations and programs to advance racial equity. To date the Commission has not tracked information regarding the budget allocation for the delivery of its services specifically to communities of color or other vulnerable populations.

16. Please identify potential impacts of your proposed reductions on communities of color and vulnerable communities, and describe what strategies your Department recommends to mitigate any potential adverse impacts.

To date the Commission has not tracked information regarding the delivery of its services specifically to communities of color or other vulnerable populations. As a small department, target reductions to the Commission’s budget typically impact staff positions, resulting in impact to the services able to be provided to all communities.

17. How does your commitment to vulnerable population(s) show up in your proposed expenditures?

To date the Commission has not tracked information regarding the budget allocation for the delivery of its services specifically to vulnerable populations. The Commission’s budget allocations ensure that its services are broadly available to the public.

18. In what ways will your entire budget be realigned for the next fiscal year in targeted ways to advance equity?

The Commission’s budget proposal will continue to seek staffing levels necessary across program areas to most effectively ensure fair and accountable decision-making to support the Commission’s unique role in promoting broad, fair, and equal participation in city government.

APPENDIX B

VULNERABLE POPULATIONS ENGAGEMENT ASSESSMENT

POPULATION	STAKEHOLDER ENGAGEMENT	% OF BUDGET	\$ OF BUDGET	CRITICAL ISSUES	MEASURABLE ACTIVITIES
<p>The Ethics Commission’s mission is to practice and promote the highest standards of integrity in government. The Commission achieves that by delivering impactful programs that promote fair, transparent, and accountable governmental decision making for the benefit of all San Franciscans. To date, the Commission has not tracked information regarding the delivery of its services specifically to communities of color or other vulnerable populations.</p>	<p>The Commission’s community engagement historically has been broadly focused on engagement at its public meetings and through services it provides both online and at its physical office in Civic Center, as described below.</p> <ul style="list-style-type: none"> The Commission administers a partial public financing program for candidates for Mayor and the Board of Supervisors, which is designed to strengthen the accountability of candidates to the voters who elect them. Candidates who meet established criteria can qualify to receive limited amounts of public funds for their campaigns and can spend less time fundraising and more time discussing issues important to their constituents. By increasing the importance of relatively small, individual contributions in election campaigns, public financing systems help encourage new and diverse voices among candidates as well as those whom they are elected to represent. The Public can provide input on items appearing or not appearing on the agenda in connection with monthly 	<p>100%</p>	<p>Operating budget of \$4.72 million in FY21.</p>	<p>Central to the mission of the Ethics Commission is the recognition and removal of obstacles to fair and equal participation in city government and supporting the ability of people to participate effectively in decisions that affect their lives. The Commission promotes this, for example, by fairly and equitably administering and enforcing governmental ethics laws that help prevent the securing of preferential outcomes from city government based on privilege, money, or connections. Its public disclosure programs promote informed participation by the public, and its whistleblower protections are designed to empower those inside city government to speak out about waste, fraud, and abuse without fear of reprisal. As an active steward and advocate for the City’s public campaign financing system, the Commission is responsible for qualifying and disbursing public matching funds from the City’s \$7 million Election Campaign Fund to candidates. This program can encourage new and diverse voices and help offset the fundraising barriers that could otherwise serve to prevent grassroots candidates from seeking office. By empowering the role of relatively small donors in City</p>	<p>The Commission tracks a variety of qualitative and quantitative metrics, including the following.</p> <p>Filer activity and compliance support related metrics:</p> <ul style="list-style-type: none"> Numbers of filers served by program area Number/percentage of on-time compliance by program area Number of disclosure statements received by program area Number of trainings conducted to support filers Number of requests for guidance, advice, and filing support fulfilled Number of pre and post compliance notices sent to filers <p>Enforcement related metrics:</p> <ul style="list-style-type: none"> Number of open investigative matters resolved Average number of complaints undergoing intake and preliminary analysis Average number of investigations underway <p>Audit:</p> <ul style="list-style-type: none"> Number of campaign committees audited Number of lobbyists audited <p>Public Financing Program:</p>

	<p>Commission meetings. Staff conduct follow up with members of the public regarding feedback received.</p> <ul style="list-style-type: none"> • The Commission publicly notices proposed regulation changes before they are made, to invite public feedback. • The Commission seeks input on policy initiatives via Interested Persons meetings. Staff also meet with public stakeholders regularly on policy matters to understand in greater depth the issues raised and to formulate Commission’s proposals that consider the feedback received. • The Commission has authority to place ordinances on the ballot as measures for consideration by the voters, engaging them most directly in the policy making process. • The Commission conducts public hearings on its budget priorities and proposals to receive input from the public to inform its programmatic and operational priorities. • The Commission provides public disclosure information and other materials both online through its website and at its physical office in Civic Center. The Commission also provides records upon public's request. • The Public can provide feedback directly through Commission’s website and subscribe to receive regular updates from the Commission via email. 		<p>elections, public financing also serves to strengthen candidate ties to the communities they are elected to serve.</p> <p>With a mission to practice and promote the highest standards of integrity in government, the Commission works to deliver impactful programs that promote fair, transparent, and accountable government for the benefit of all San Franciscans. Those entrusted to serve whose corrupt actions violate the law must be held publicly accountable for that public harm. When enforcement actions are significantly delayed or not pursued, inequities perpetuated by corrupt actions can take root and service to disenfranchise those with less privilege and access. Equity is not advanced when the public loses faith in the legitimacy of government and opts out of participating. To ensure that government works only in the public interest and that the public can trust it to do so, oversight systems must be focused, effective, and sustained.</p>	<ul style="list-style-type: none"> • Number of candidates who are certified to receive public funding • Amount of public funds disbursed • Average amount of funds received by candidates <p>Administrative:</p> <ul style="list-style-type: none"> • Number of public records requests fulfilled
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