



San Francisco Ethics Commission

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February 3, 2025

To: Members of the Ethics Commission
From: Steven Massey, Director of Technology Services
Subject: Agenda Item 5: Electronic Disclosure & Data Analysis Division Report

Summary

This report provides general programmatic updates about the Electronic Disclosure and Data Analysis Division.

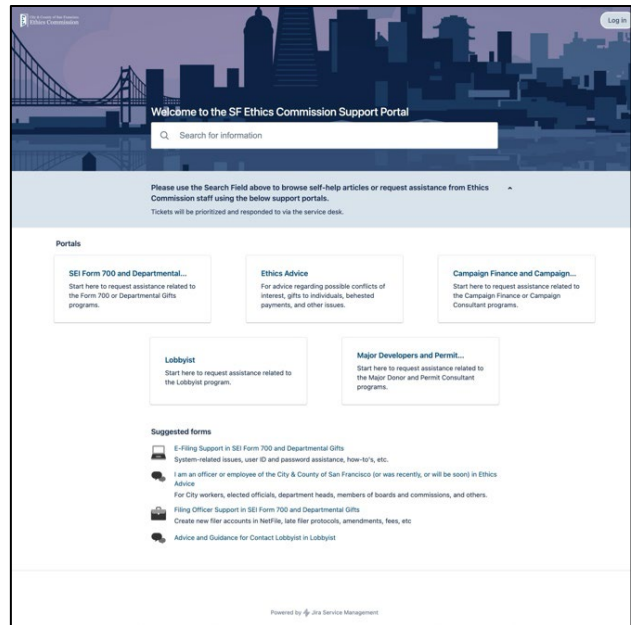
No action is required by the Commission, as this item is for informational purposes only.

About the Division

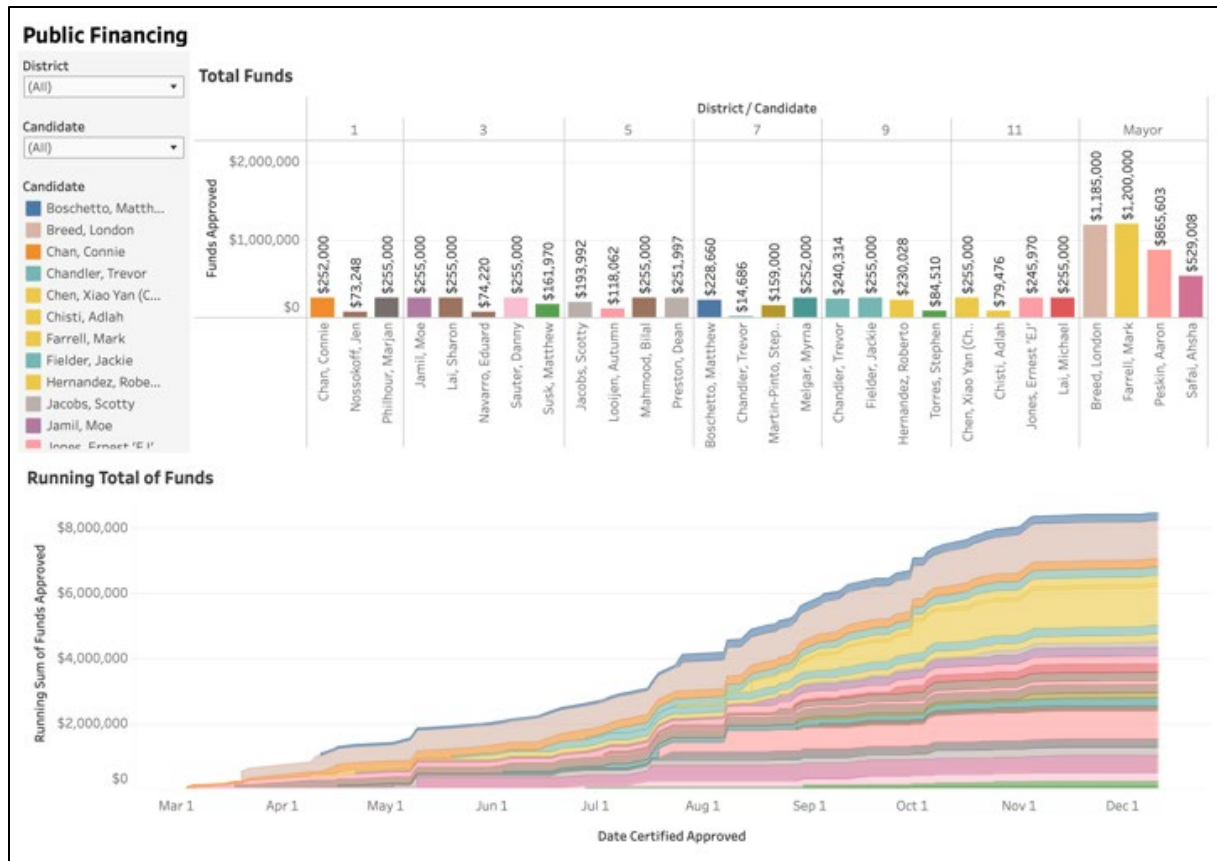
The Electronic Disclosure and Data Analysis (EDDA) Division oversees the Commission’s electronic filing systems, website, data analysis, open datasets, and public access systems. It is also responsible for technology procurement, contracting, and general IT services and support for the department. This report outlines the key accomplishments and activities of the EDDA Division in the first-half of the fiscal year.

Public Support Portals

At the start of the fiscal year, the EDDA Division collaborated with the Commission's Engagement and Compliance Division to launch [public support portals](#) for campaign finance, lobbying, permit consulting, major developers, and ethics advice. This effort was an expansion of the support portal model in-use for the Form 700 program. Users can request support online, by telephone, or email and track the status of their request via the portals. The portals also provide valuable metrics to the department for resource allocation. In the past 12 months, over 1,300 support requests were resolved by Commission staff via the portals.



Campaign Finance Dashboards



The [Campaign Finance Dashboards for the November 2024 election](#), updated daily during the election season, provided tools to analyze and publicize election fundraising and spending, enhancing public awareness. Since their release in February 2024, the dashboards have garnered over 36,000 views—more than doubling the engagement seen in the 2020 and 2022 elections. In December, Tyler Field, Senior IS Engineer, participated in a panel discussion and presented the dashboards at the Council on Governmental Ethics Laws (COGEL) Conference in Los Angeles.

Departmental Gift Form

As mandated by Proposition D, passed on March 5, 2024, City departments are now required to report gifts they receive on a monthly basis to the Ethics Commission. This new compliance requirement enhances transparency and ensures timely public disclosure of departmental gift activity. On December 1st, the Commission launched an [electronic filing process](#) to simplify compliance and facilitate timely reporting. Departments began reporting gifts received as of November 2024, with the first report due on December 15, 2024. Gift data is published in real-time on [DataSF](#) and linked on the [Commission’s Departmental Gifts Disclosure page](#).

The Departmental Gift Form is the first form launched on new a type of electronic filing process developed and implemented by the EDDA Division in preparation for the passage of Proposition D. This

new filing process, which EDDA designed primarily for filings required under City law, improves the user experience by supporting a variety of device sizes, including mobile, tablets, and desktops, while offering an efficient, user-friendly interface for entering lists of data—a common requirement on disclosure forms. This supports the Commission’s goal of increasing access to City systems.

Online Ethics and Sunshine Training Platform

In addition to the gift form, Proposition D enabled the Commission to develop a new mandatory ethics training for City officials that are required to file Form 700. The EDDA Division collaborated with Netfile to create a new platform to host the Commission's new Ethics training module, developed in-house by the Commission's Engagement and Compliance Division. The platform also hosts the City Attorney's Sunshine Ordinance training. This integrated platform allows users to file the Form 700 and complete both the ethics training and sunshine ordinance training all within NetFile. This integrated system provides for easier compliance by City officials and more effective compliance tracking and enforcement by the Commission.

The new platform was launched in October. City officials that complete the training requirements will e-file a certificate that is accessible to the public, along with the official's Form 700, on the Commission's [online public access portal](#).

Campaign Consultant Disclosures

Following the August 9, 2024 amendments to the Campaign Consultant Regulations, staff launched a [new electronic filing system](#) on December 9, 2024. The system, also built on the new electronic filing process discussed above, consolidates six paper forms into two electronic forms, streamlining the filing process. To date, 84 campaign consultant reports and related statements have been filed. Filing data is published in real-time on [DataSF](#) and linked on the [Commission’s Campaign Consultant Disclosure page](#).

At the start of the COVID-19 pandemic, the EDDA division created a temporary electronic upload process for filers that needed to submit a broad array of paper-based forms to the Commission. Filers would scan and upload forms via a tool provided on the Commission’s web site. With the launch of the Campaign Consultant Forms, the temporary electronic upload process was decommissioned. This means that the transition to fully electronic submissions of all forms in all program areas has been completed. This marks a major milestone in the Commission’s yearslong efforts to implement universal electronic filing and ensures that the Commission’s systems are effective and can remain current as technology changes.

Online Audit Records Submission

In January 2025, EDDA staff worked with the Audit division to introduce a secure electronic document submission system to facilitate audits of publicly financed candidate committees, fulfilling the requirements of Regulation 1.170-1, approved at the April 12, 2024 meeting. Committees now have an easy and reliable way to submit records online for review by Commission auditors. In addition, EDDA staff will be rolling out the system to the Enforcement Division in the coming weeks to enable

investigators to more easily transmit and receive electronic records with external parties like respondents and their counsel.

AI and Automation

The EDDA Division participated in the Department of Technology's ChatGPT Discovery Program, leveraging advanced AI capabilities to develop internal tools. EDDA staff built GPTs to search Fair Political Practices Commission (FPPC) advice letters, relevant state and local laws, historical Commission meeting materials, and case stipulation documents. Staff have been testing additional use cases such as revising documents, simplifying content to a 5th grade reading level to comply with [Committee on Information Technology \(COIT\) Digital Accessibility and Inclusion Standards](#), and summarizing materials. The pilot program concludes at the end of February.

Over the past few months, the EDDA Division has been collaborating with the Enforcement Division to develop automations, using scripting and machine learning, to canvass disclosure datasets and identify potential violations. The Commission will seek funding to expand this work into other program areas such as Audits in the upcoming fiscal year.

MDM Plan

Additionally, the EDDA Division developed internal procedures to address the risks of misinformation, disinformation, and mal-information (MDM) incidents. An internal online submission form will enable staff to alert the appropriate staff and upload evidence in the event of such an incident. Staff will receive training on these new procedures in the coming weeks. Staff undertook this work after participating in the Board of Supervisors Rule Committee hearing on threats posed by AI and reviewed a similar policy in use at the Department of Elections.

Onboarding and Human Resources

Over the past few months, the EDDA Division successfully onboarded nine new Commission staff members and will assist with one more in February for a total of ten new staff onboarded. EDDA staff conduct an IT needs assessment before each new employee's start date to determine equipment needs at home for remote work. Each team member was equipped with the necessary tools and access to City IT systems, ensuring they could effectively perform their roles both remotely and in-office. In addition to standard onboarding processes, EDDA staff provided initial software training based on job duties and responsibilities.

To enhance internal operations, the EDDA Division collaborated with the Department of Human Resources (DHR) and other Commission staff to develop an Ethics Commission Human Resources intranet site. This platform consolidates electronic personnel and HR records into a single accessible location, streamlining access and management. Commission staff scanned and digitized all personnel files, ensuring full electronic availability while maintaining compliance with City requirements for hard-copy record storage. A business process was established to verify the integrity of hard-copy file storage, and staff were trained on these new procedures. Via the Commission's work order with DHR,

comprehensive documentation for HR processes is in development to further standardize and improve operations.

Notification of Contract Approval

Under City law, elected officials must report each instance in which they approve a City contract valued at \$100,000 or more. This reporting is available through a public dataset and is what campaigns use to ensure that candidates do not accept prohibited contributions from City contractors. This rule and the reporting requirement have been in place for many years.

In 2018, the Clerk of the Board of Supervisor and the Mayor's Office asked the Commission to create a [customized workflow](#) for reporting contract approvals that would improve internal operational efficiencies within those offices as they complied with the reporting requirement. Specifically, the customized workflow serves as a technology tool that allows the Clerk and Mayor to have department staff (in the department that is entering into the contract in question) enter most of the required information, which is then funneled to the Board Clerk and Mayor.

Since the Commission created and implemented the system, Commission staff have been maintaining the system, as any technology process requires regular maintenance, updating, troubleshooting, and user support. Most recently, in August 2024, the EDDA Division deployed new backend applications to enhance the efficiency and security of the custom reporting workflow. These applications ensure alignment with updated DocuSign security requirements.

Upcoming Initiatives

The following are current or upcoming initiatives involving the EDDA Division:

- The division is scoping the ability to **mass import transactions** into the division's new electronic filing process. This would potentially improve the efficiency of completing the disclosure requirement for departments with a high volume of gift activity, in addition to similar types of disclosures on other local forms.
- Planning will commence for a **cybersecurity tabletop exercise** later in the spring. The City's [EFS 18 - Unified Cyber Command Emergency Response Plan for the City & County of San Francisco](#) requires departments to conduct a tabletop exercise where key department representatives role-play a response to a simulated cybersecurity incident.
- EDDA staff will be working with stakeholders to plan for **improvements to the Campaign Finance Dashboards** to be included in the 2026 election cycle.
- The EDDA division will continue to collaborate with the Policy Division to work with the FPPC to find a **workable resolution to the impacts of Assembly Bill 1170**, which has resulted in elected officials and members of the Planning Commission being required to file the Form 700 twice, in separate electronic filing systems (once in the Commission's system, and once in the FPPC's system). Staff are focused foremost on maintaining the same level of access to the Form 700 disclosure filings that was available to the public prior to the passage of Assembly Bill 1170, while at the same time seeking to alleviate the burden of multiple filing requirements on affected filers, which are 23 of the highest level officials in City government, including the Mayor and Board of Supervisors.

- The division is **navigating stricter City security requirements**, including enhanced data protection protocols, cybersecurity insurance requirements, and vendor compliance standards. These challenges affect the procurement of subscription-based software products critical for the Commission's technological needs in calendar year 2025. Staff is working to complete procurement and contracting before upcoming fiscal year close deadlines.