



San Francisco Ethics Commission

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February 21, 2025
By Electronic Mail Only

The Honorable Daniel Lurie, Mayor
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: Ethics Commission FY26-FY27 Budget Submission

Dear Mayor Lurie:

Attached for your review and consideration is the Ethics Commission's budget proposal for FY26 and FY27.

The Ethics Commission was established by San Francisco voters to serve as an independent oversight body that promotes accountability, transparency, and fairness in City government. By administering and enforcing conflict-of-interest, ethics, and lobbying laws, the Commission helps ensure that public resources are used for the benefit of San Francisco's communities—not for personal gain. Similarly, the campaign finance laws enforced by the Commission ensure that expenditures in City elections are publicly disclosed and do not improperly influence the decision-making of elected officials. The Commission's work fosters public trust, reinforcing the City's ability to address critical issues, attract businesses and visitors, and advance key priorities such as economic recovery and public safety.

All of these key objectives will be more difficult to achieve if the public does not trust City government to act with integrity to solve the problems facing our great City. In recent years, federal and local corruption investigations have led to multiple indictments and convictions against City officers, employees, and contractors for bribery, fraud, self-dealing, and pay-to-play schemes. These scandals have severely eroded public confidence in San Francisco's government and damaged our reputation across the country. Without effective and sustained measures to prevent future corruption and restore trust, the City will face greater challenges in addressing its most pressing issues.

The Commission's key objectives for the next two fiscal years include:

- Providing effective education and compliance assistance to regulated communities and the public, including trainings and written compliance materials.
- Conducting thorough and timely audits using updated protocols.
- Strengthening enforcement functions through increased proactive investigations and high-impact cases.
- Ensuring robust electronic disclosure systems that enhance compliance and public access to disclosures.
- Refining ethics, campaign finance, and lobbying laws to address emerging challenges.

- Enhancing operational efficiency through automation, standardized procedures, and data-driven approaches.

The Commission’s proposed budget maintains essential functions within its \$7.23 million baseline operating budget for FY26 and requests \$7.61 million for FY27, reflecting a \$65k increase above the \$7.55 million baseline budget for FY27. Detailed budget justifications are provided in Sections I–III below.

As requested, the Commission has also identified a potential 15 percent budget reduction, per the December 2024 budget instructions. However, given that 87 percent of the Commission’s budget is allocated to personnel, these cuts would directly impact core functions by eliminating filled positions and diminishing the Commission’s ability to ensure compliance, hold individuals accountable for breaking the law, and provide transparency. The specific impacts of these reductions are provided in Sections IV–V below. Additional information regarding the Commission’s mission, organizational structure, and functional divisions are included in Attachment A.

Thank you for your consideration of the Ethics Commission’s budget proposal. We look forward to discussing how the Commission’s priorities align with your vision for accountable and ethical government and revitalizing San Francisco.

Sincerely,



Patrick Ford
Executive Director
San Francisco Ethics Commission

I. Ethics Commission FY26-FY27 Departmental Budget Proposal Summary

Position Requests	FY26	FY27
Fill Vacancy		
1823 Senior Program Administrator	-	-
Position Reclassification Requests		
1230 Training Design Specialist to 1823 Senior Program Administrator	\$757	\$786
Director of Enforcement from 0922 (Manager I) to 0923 (Manager II)	\$15,274	\$15,956
1823 Senior Investigator to 1824 Principal Investigative Analyst (Two positions)	\$58,178	\$60,330
1052 IS Analyst to 1042 IS Engineer	\$41,235	\$42,759
Position Funding to be Removed		
1222 Personnel Clerk	\$(157,269)	\$(163,568)
Total	\$(41,825)	\$(43,737)
Other Requests	FY26	FY27
Services of Other Departments		
Department of Technology Services (Software cost increases)	\$10,362	\$10,362
City Administrator’s Office (New work order for payroll services)	\$47,807	\$49,734
Controller’s Office (Reduce existing work order for accounting services)	\$(25,000)	\$(25,000)
Sub Total	\$33,169	\$35,096
Non-Personnel Services		
Systems Consulting Services (Netfile system maintenance & Form 700 licenses)	\$(13,148)	\$50,630
Software Licenses (Support departmental operations including website)	\$21,804	\$23,685
Sub Total	\$8,656	\$74,315
Total	\$41,825	\$109,411
TOTAL BUDGET REQUEST	-	\$65,674
BASELINE OPERATING BUDGET	\$7,232,788	\$7,550,740
REVISED BUDGET TOTAL (including requests)	\$7,232,788	\$7,616,414
Percentage increase relative to the baseline budget	0%	0.9%

II. Ethics Commission FY26-FY27 Detailed Budget Proposal

POSITION RELATED REQUESTS

The Commission's budget proposal seeks to retain essential staffing and reclassify key positions in critical program areas beginning in FY26, as detailed below.

ENABLE CRITICAL COMPLIANCE FUNCTIONS

The Engagement and Compliance Division is responsible for administering the Commission's compliance functions. This Division consists of seven positions, with one vacancy, as outlined in the organization chart in Section III. This budget proposal seeks to fill the existing vacancy and reclassify a position within the Division to better align with evolving programmatic needs, as detailed below.

➤ **Fill vacant 1823 Senior Program Administrator position**

The 1823 Senior Program Administrator position in the Engagement and Compliance Division became vacant at the end of January 2025 due to normal attrition. This public-facing role is essential for providing customer support, compliance guidance, filing assistance, training, technical support, and daily administration for various programs under the Ethics Commission's jurisdiction. Due to the citywide hiring freeze and FY26-FY27 budget instructions, recruitment to fill this position could not be initiated. To meet the required 15 percent budget reduction, this position would need to remain vacant, as outlined in Sections IV and V. However, this proposal seeks to restore funding for the position, as originally allocated in the baseline budget for FY26 and FY27, to ensure that the Commission can continue providing critical compliance support.

➤ **Reclassify 1230 Training Design Specialist position to 1823 Senior Program Administrator position**

The 1230 Training Design Specialist position was added to the Commission's budget in FY22 to expand its ethics training program and was filled in December 2022. Over the past two years, this role played a key part in developing ethics training resources and educational materials, particularly in support of the implementation of Proposition D, which took effect in October 2024.

With Proposition D now in place, the Division's programmatic focus has shifted toward enhancing advice and compliance assistance for City departments and other regulated stakeholders, driven by a significant increase in support requests. To align with these evolving needs, this proposal seeks to reclassify the 1230 Training Design Specialist position to an 1823 Senior Program Administrator position.

Under the City's job specifications, the 1230 classification (Instructional Designer) is responsible for performing all aspects of producing professional quality computer-based instruction presentations whereas the 1823 classification (Senior Administrative Analyst) is responsible for directing and performing difficult, complex, and sensitive projects for departmental management. This reclassification will allow this role to take on expanded responsibilities beyond the structural

limitations of the current classification, thereby strengthening the Engagement & Compliance Division's ability to meet strategic priorities in the coming years.

This position is also impacted by the Mayor's target budget reduction. However, this proposal seeks to retain and reclassify the position to ensure adequate staffing capacity in the Engagement & Compliance Division. Because the salary levels for 1230 and 1823 classifications are similar, this reclassification will require only a modest funding allocation of \$757 in FY26 and \$786 in FY27.

The two 1823 Senior Program Administrator positions will be responsible for carrying out essential compliance functions, including:

- Providing guidance and advice to regulated stakeholders—including City officials, political committees, and lobbyists—to enhance compliance with the Commission's laws.
- Developing and delivering high-quality training tools, including in-person workshops, live webinars, and online training modules tailored to varied audiences.
- Creating compliance resources and maintaining up-to-date, accurate information on the Commission's website.
- Assisting with the implementation and roll-out of newly adopted laws, policies, and business processes.
- Ensuring the completeness and accuracy of public disclosure filings.
- Developing and maintaining program performance measures, including compliance data and operational metrics, to assess program effectiveness.

The Engagement and Compliance Division administers a wide range of compliance programs, including campaign finance, governmental ethics, conflicts of interest, lobbying, campaign consultants, permit consultants, and major developers. Without restored funding for these two positions, the Division's capacity will be reduced by roughly 29 percent, significantly impairing the Commission's ability to provide timely compliance guidance and assistance to filers and the public. Additional details regarding the impact of target budget reductions are provided in Section V.

ENABLE EFFECTIVE POLICY DEVELOPMENT AND EXECUTION

The Policy Division leads the Commission's policy research, analysis, and legislative efforts. It comprises three positions: 1824 Policy & Legislative Affairs Manager, 1844 Senior Policy Research Specialist, and 1840 Policy Research Specialist. Until recently, the Division operated with only the manager position. In January 2025, two staff positions were added to support new projects and the ongoing implementation of Proposition D. The addition of these roles has allowed the Policy Division to expand its capacity and proactively address emerging policy issues. The Policy Research Specialist position is included in the 15 percent target cut, and the Commission's proposal seeks to retain its funding as allocated in the FY26-FY27 baseline budget.

➤ Retain 1840 Policy Research Specialist position

The Commission's last major policy initiative, launched in 2020, sought to reform the City's ethics and conflict of interest laws. This effort resulted in voter-approved changes through Proposition D in

March 2024, which became operative in October 2024. As City departments and stakeholders work to implement and comply with Proposition D, the Policy Division plays a vital role in providing timely advice, answering compliance-related inquiries, and developing educational materials.

The Policy Division has identified several upcoming priorities to evaluate and modernize existing programs and laws to ensure that they remain effective, efficient, and aligned with the City's public accountability goals. These priorities include a comprehensive review of the City's lobbyist and permit consultant programs, as well as other programs such as Major Developers, Campaign Consultants, and Trustee Candidate Disclosures, to assess whether they are meeting their intended goals. Many of these programs have not been comprehensively studied or evaluated in years, requiring extensive research support to initiate and complete the projects efficiently. The 1840 Policy Research Specialist position is essential to providing the staffing capacity needed in the Policy Division to support these initiatives.

Additionally, the Policy Division plays a vital role in monitoring external policy developments that impact the Commission's work and engaging with stakeholders. For example, the Commission was recently impacted by state legislation concerning the Statements of Economic Interest (Form 700). This legislation severely impacts the Commission's work regarding the Form 700s filed by top City officials and has the potential to greatly harm transparency concerning conflicts of interests. Addressing the impacts of this state legislation, including engaging with filers, policymakers, and state agencies, involves significant staffing resources. It is essential to devote these resources to preserve the integrity and effectiveness of programs such as the Form 700.

Similarly, the Commission also serves as a resource for City policymakers when ethics laws require review or revision. By engaging with policymakers and their staff, conducting research, and advising the Commission on potential amendments to ethics rules, the Policy Division helps ensure that the City's ethics frameworks remain current and effective. Without adequate policy staffing, the Commission's ability to fulfill this role is significantly constrained.

Key responsibilities of the 1840 Policy Research Specialist include:

- Providing compliance assistance by responding to advice inquiries and contributing to the development of educational materials.
- Reviewing City ethics laws to assess their effectiveness and recommend improvements where needed.
- Conducting historical and cross-jurisdictional research to evaluate best practices that may inform City policies.
- Collecting, analyzing, and synthesizing qualitative and quantitative data to support policy development.
- Monitoring external stakeholders and policymaking bodies whose actions may impact the Commission's work.
- Supporting collaboration with government agencies, non-governmental organizations, and private stakeholders to incorporate external perspectives into Commission policies and programs.

FORMALIZE DUTY REALIGNMENT IN ENFORCEMENT PROGRAM

The Enforcement Division is composed of one 0922 Manager I (Director of Enforcement) and five 1823 Senior Administrative Analysts (Senior Investigators).¹ Over the past several years, the Commission has made significant progress in strengthening its enforcement program. The Division successfully eliminated its case backlog and increased both the volume and quality of its caseload to meet the ongoing demands of complaints, Whistleblower Program referrals, due process requirements, and recommendations from the Budget and Legislative Analyst (BLA) and Controller. As a result, the Division has achieved a substantial increase in case resolutions, including more critical and complex cases and higher penalties.

Recent process improvements have identified new skills and specialized responsibilities within certain positions in the Enforcement Division. To address these needs, the Commission included in its FY25 budget proposal a request to reclassify three positions within the Division. While these reclassifications were included in the Mayor's proposed budget in FY25, they were ultimately not approved in the City's adopted budget. Given the ongoing and demonstrated need for these changes, the Commission is resubmitting the reclassification requests in the FY26-FY27 budget proposal, as detailed below.

➤ **Reclassify two 1823 Senior Investigator positions to 1824 Principal Investigative Analysts**

To expedite case resolution and improve case outcomes, two of the Division's 1823 Senior Investigator positions must assume traditional prosecutorial functions. These responsibilities include managing case completion timelines, conducting complex legal research, drafting and negotiating settlement agreements with respondents' attorneys, drafting legal briefs, developing protocols and template legal documents, supervising aspects of investigative work, and trying cases through administrative hearings. These positions will also play a larger role in advising other staff, including Audits and Engagement and Compliance, on legal and internal advice matters.

Under the City's job classification specifications, "[c]lass 1824 Principal Administrative Analyst is distinguished from Class 1823 Senior Administrative Analyst by its assignment to greater and/or more complex financial responsibilities, its performance and supervision of more difficult, complex, and sensitive projects and negotiations, and its greater independence of action and consequence of error in formulating recommendations and decisions."² Given the high level of skill, autonomy, responsibility, and supervisory work required, reclassification to 1824 classification is warranted to properly reflect the nature of these positions.

➤ **Reclassify Director of Enforcement position from 0922 (Manager I) to 0923 (Manager II)**

The essential duties of the Director of Enforcement have also changed as a result of recent operational improvements. The Director of Enforcement now supervises a larger team of investigators and oversees a broader range of program areas. Responsibilities would include

¹ An 1822 Administrative Analyst position within the Division has been kept vacant to meet attrition targets and will remain so through FY26 and FY27 under the proposed budget.

² SF CAREERS, [1824—Principal Administrative Analyst, Job Classification](#).

overseeing the separate work of positions performing investigative work and positions performing prosecutorial work. The complexity and breadth of these responsibilities exceed the current classification of 0922. Under the City's job classification specifications, "Manager I is distinguished from the Manager II class by the latter's responsibility for one or more large section(s) or functional areas. Manager I is further distinguished from Manager II by the latter's responsibility for providing complex, diverse programs or services."

Given the shifting of investigator duties into two distinct roles, as described above, the Director of Enforcement position is responsible for planning and managing a wide array of core functions that warrant its reclassification to 0923, including:

- Managing timely investigation and resolution of all enforcement cases, including complaints, Whistleblower referrals, and internally initiated cases.
- Providing expertise in all areas of the law administered by the Commission including campaign finance, campaign consultants, lobbying, Form 700, conflict-of-interests, behested payments, public records, whistleblower retaliation, major developers, and permit expeditors.
- Administering Form 700, lobbyist, and campaign finance late fines, as well as non-filer remediation programs.
- Overseeing probable cause hearings and hearings on the merits.
- Providing strategic support and guidance to the Audits Division.
- Ensuring effective outcomes of highly sensitive and urgent cases that affect elections and government operations.

The scope and complexity of work required for this position exceeds the current classification because it demands the application of intricate policies and procedures, as well as advanced strategic thinking, analytical expertise, independent judgement, and strong management skills. There has been a consistent and dramatic decrease in the time to resolve enforcement cases and an improvement in the quality of case outcomes since the duties of the Director of Enforcement position were enhanced. This new level of responsibility should be reflected in the Commission's structure in a permanent manner by reclassifying the position to 0923. This change will also mitigate compaction concerns arising from the reclassification of 1823 positions to 1824 classification within the Division.

BUILD AUTOMATION TO ENHANCE ENFORCEMENT AND AUDITS

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 Division consists of four positions: 1054 Director of Technology Services, 1053 Senior IS Analyst, 1052 IS Analyst, and 1043 Senior IS Engineer. This budget proposal requests reclassification of the 1052 IS Analyst position to a 1042 IS Engineer to better support the Commission's effective use of technology to achieve enforcement and audit priorities.

➤ **Reclassify 1052 IS Analyst to 1042 IS Engineer**

A key Commission priority is to strengthen proactive enforcement by leveraging technology to identify and investigate significant violations within its jurisdiction. This requires developing automated data analysis tools to efficiently process the Commission’s extensive public disclosure datasets. Additionally, the Audits Division has long struggled with persistent backlogs in completing audits of publicly financed candidates. To address a skills gap, in FY24-25, the Commission reclassified positions in the Audit Division to align with the classifications used by the Controller’s City Services Auditor Division. To further streamline the audit process, in FY25-26, the Commission plans to integrate automated data processing and analysis, minimizing reliance on manual checks to verify committee compliance with the law. However, with its current resources, the EDDA Division lacks the engineering capacity to sustain existing electronic filing services, open data pipelines, dashboards, and web services while also developing and implementing advanced scripting, data automation, and machine learning solutions.

Under the City’s job specifications, a 1052 IS Analyst primarily manages systems development life cycles, including needs analysis, systems analysis, project planning and management, implementation and testing, technical documentation, user training, and post-implementation assessment. In contrast, the 1042 classification is responsible for analyzing, planning, designing, implementing, maintaining, troubleshooting, and enhancing large, complex systems, while also serving as the technical architect and systems integrator for those systems. To enable the position to fulfill these expanded engineering responsibilities, reclassifying the 1052 IS Analyst to a 1042 IS Engineer is necessary.

Key responsibilities of the 1042 IS Engineer include:

- Develop automation solutions to analyze disclosure datasets and detect potential violations.
- Collaborate with the Enforcement and Audit Divisions to effectively address all major use cases for data-driven investigations and audits.
- Procure and manage technology services that support enforcement and audit automation.
- Design and develop automation tools to detect patterns of potential violations.
- Build and maintain technical infrastructure for reliable and efficient automation programs.
- Prepare technical documentation and training materials to support staff adoption and implementation.

ACHIEVING ADMINISTRATIVE EFFICIENCIES

The Commission’s Operations Division is responsible for managing department-wide administrative functions, including budgeting, financial management, procurement, payroll, human resources, and recruitment. This Division consists of four positions: 0951 Deputy Director & Chief Operating Officer, 1824 Budget & Operations Analyst, 1454 Executive Secretary, and 1222 Personnel Clerk. As part of this budget proposal, the Commission proposes defunding the 1222 Personnel Clerk position to streamline administrative operations and achieve cost savings.

➤ **Remove funding for 1222 Personnel Clerk**

The 1222 Personnel Clerk position has historically supported payroll processing, personnel management, and procurement of goods and services. Funding for this position will be eliminated and payroll processing responsibilities will be transferred to the City Administrator’s Office under a new work order. Other administrative functions previously handled by this position will be absorbed by other Commission staff and the Department of Human Resources (DHR) under an existing work order. By reallocating these responsibilities, the Commission will reduce operational costs while maintaining administrative efficiency. The savings generated from this adjustment will be redirected to support higher-priority initiatives outlined in this budget proposal.

SERVICES OF OTHER DEPARTMENTS

Total in FY26: \$33,169 FY27: \$35,096

The Commission’s FY26-FY27 budget proposal requests funding for the following services of other departments.

- **Funding for the Department of Technology (DT) to cover cost increases for software services** that are centrally managed by DT for the City, such as office software tools, DocuSign e-filings used by the Commission for public disclosures, training development tools, and website hosting services. *FY26: \$10,347 FY27: \$10,347*
- **Funding for a new work order with the City Administrator’s Office to assume payroll functions** previously handled by the 1222 Personnel Clerk position, which will no longer be funded. *FY26: \$47,807 FY27: \$49,734*
- **Adjust funding for the work order with the Controller’s Office to align** with the current level of **accounting services** required. *FY26: \$(25,000) FY27: \$(25,000)*
- **Potential funding request for larger office space.** The Ethics Commission currently operates from a single office at 25 Van Ness Avenue, which has limited capacity for staff seating, meetings, and collaboration—key elements for carrying out its work effectively. To better accommodate staff and enhance teamwork, the Commission is exploring options for a larger office space that will foster a more collaborative and productive work environment. A larger, more functional office space will also encourage staff to work onsite more frequently, supporting the City’s goal of revitalizing its downtown. The department is engaging with the **City’s Real Estate Department** to evaluate potential locations; however, an estimated budget and timeline are not yet available, as assessments are still in progress. Securing the right office space is critical to strengthening the Commission’s ability to fulfill its core mandates effectively. A larger office space may require an increased rent allocation beyond what is currently available in the Commission’s baseline budget for FY26 and FY27. The Commission will provide further updates on this request as additional details become available.

NON-PERSONNEL SERVICES

Total in FY26: \$8,656 FY27: \$74,315

The Commission's FY26-FY27 budget proposal requests funding for the following non-personnel services.

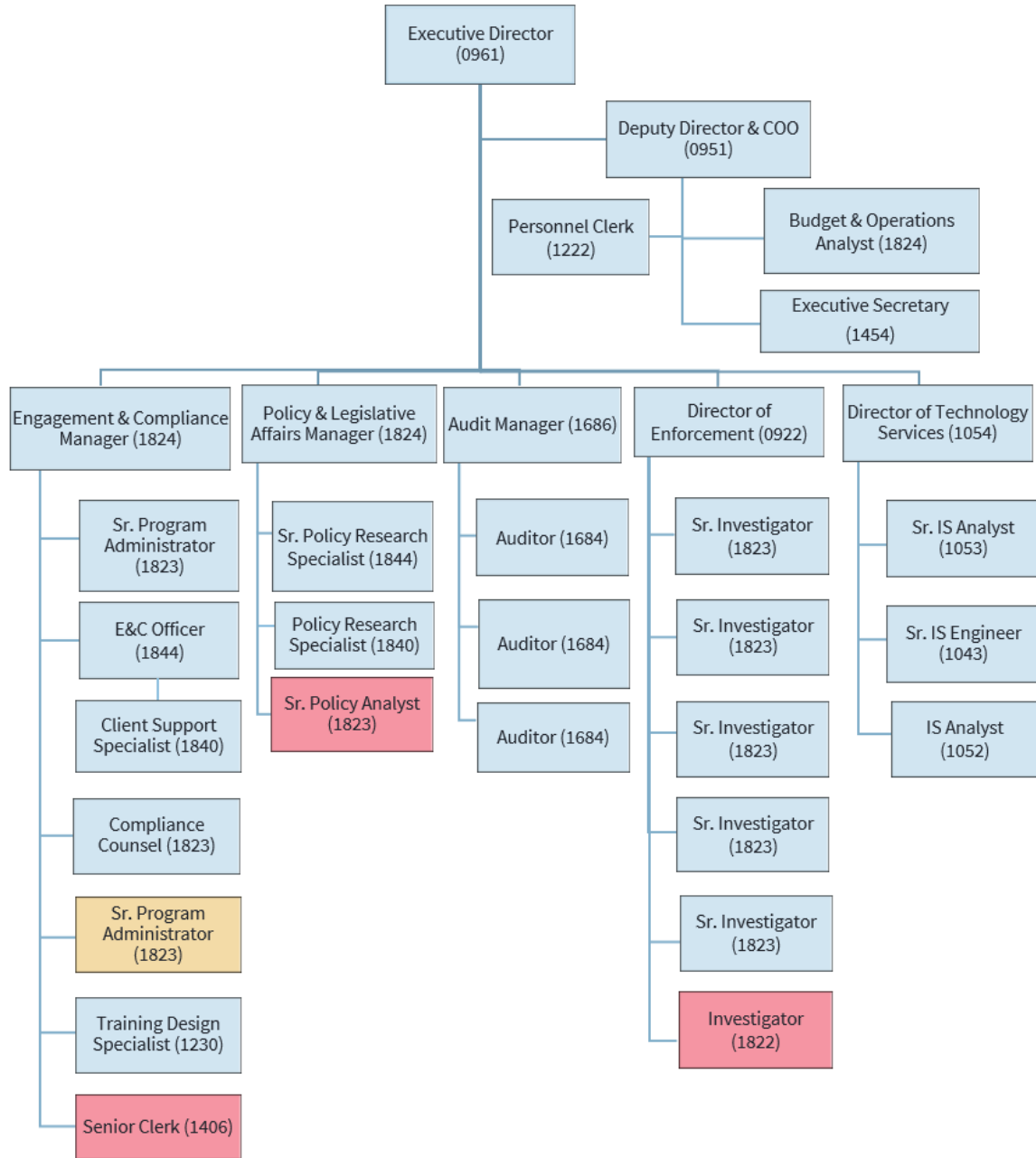
- **Funding adjustments to support Netfile systems**, reflecting anticipated savings from the discontinuation of the Netfile Campaign Consultant System by the end of FY25, following its replacement with a new system in December 2024. Additionally, this includes cost increases for Netfile licensing to support citywide Form 700 filers, covering approximately 6,000 city officials and employees. Previously funded through the COIT E-Filing Conversion Project, this funding source is expected to be depleted by early 2026. *FY26: \$(13,148) FY27: \$50,630*
- **Funding for software tools** used by staff to perform core business functions **and essential technology** to enable critical departmental operations, including software services to maintain the Commission's website. *FY26: \$21,804 FY27: \$23,685*

ELECTION CAMPAIGN FUND

This Fund is established in the City's Campaign Finance Reform Ordinance (CFRO) to provide partial public financing for candidates for Mayor and the Board of Supervisors who meet the required eligibility criteria. This is a separate fund which is not a part of the Commission's operating budget. The Fund currently has a balance of \$2.3 million and is capped at a maximum of \$7 million. The City's baseline budget for this fund for FY26 and FY27 currently provides an additional allocation of \$446,860 each year.

III. Organization Charts

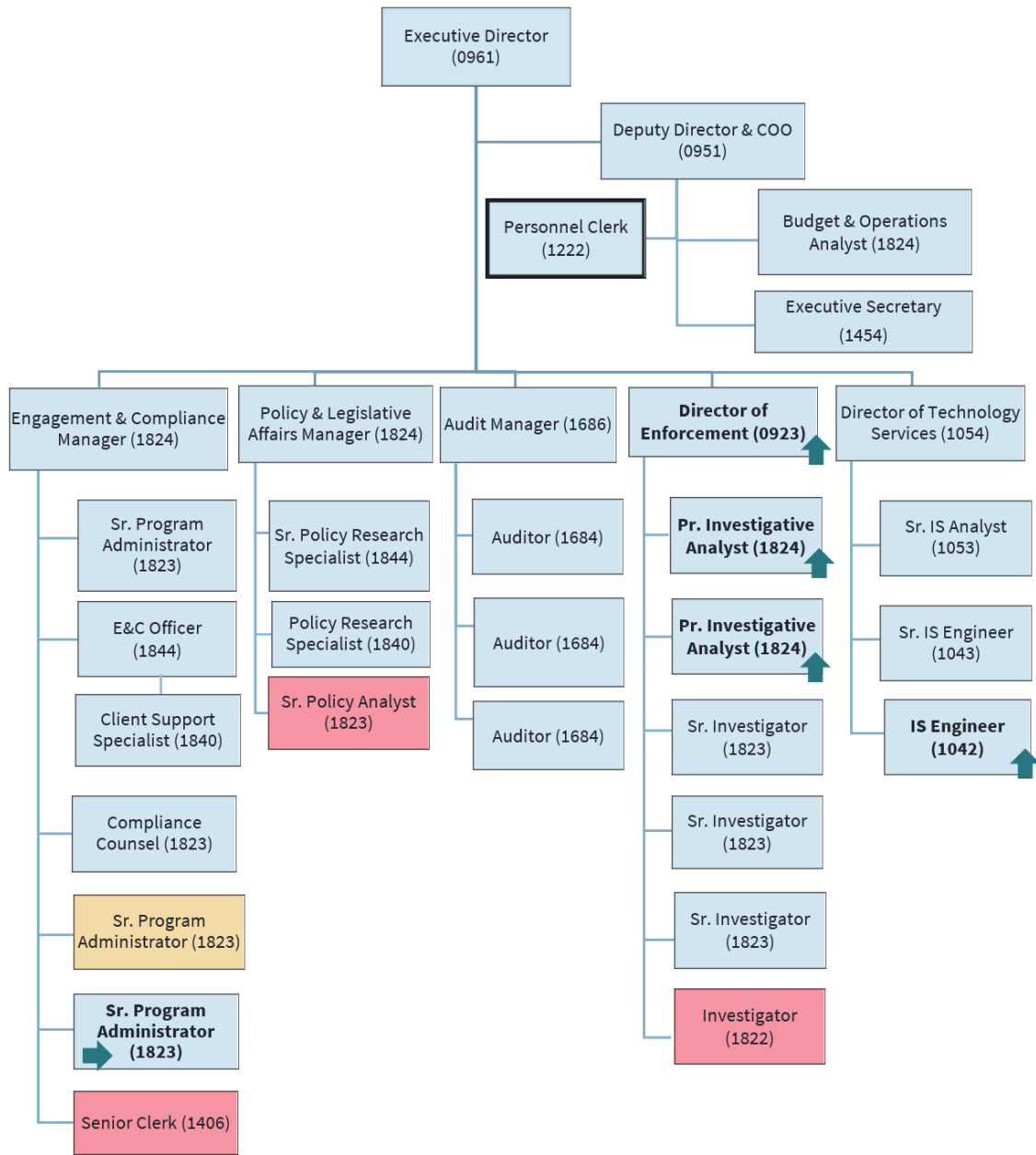
Ethics Commission - Current Organization Chart (FY25)



- 28 positions are currently filled

- Vacant position to be filled pending budget approval
- Positions held vacant for attrition savings
- Filled positions

Ethics Commission – FY26-FY27 Proposed Organization Chart



- 28 positions are currently filled
- 28 positions will be funded under this scenario

- Vacant position to be filled pending budget approval
- Positions held vacant for attrition savings
- Filled positions
- Reclassification to a higher job class
- Reclassification to a job class with similar funding
- Position to be vacated

IV. Mayor's Target Cuts

On December 3, 2024, the Mayor issued annual budget instructions to City departments for FY26 and FY27, directing City departments to propose ongoing General Fund reductions of 15 percent to address a projected \$876 million budget shortfall, including a \$253 million deficit in FY26 and \$623 million in FY27. **For the Ethics Commission, this equates to an ongoing \$1.1 million reduction in FY26 and FY27.**

These reductions must be applied to the Commission's baseline budget for FY26 and FY27, which already includes attrition savings targets. Like all City departments, the Commission must account for potential attrition as part of normal operations. In recent years, to meet required savings, the Commission has had to leave three positions vacant: **1406 Senior Clerk, 1822 Investigator, and 1823 Senior Policy Analyst.**

As a small department, with approximately 87 percent of its budget allocated to salaries and benefits, meeting the Mayor's target cuts will require **eliminating funding for four additional positions**, reducing the Commission's budgeted staffing levels by **14 percent** (from 29 positions).

To further align with budget constraints, a portion of salary costs for administering the Public Financing Program will need to be reallocated from the Commission's operating budget to the Election Campaign Fund. Specifically, 50 percent of the salary and benefits for two 1684 Auditor positions in the Audit Division will be covered under this shift. The Commission is permitted to allocate up to 15 percent of the total Election Campaign Fund for an election toward program administration, as authorized under SF Campaign and Governmental Conduct Code Section 1.138.

The position changes required to meet the target cuts are summarized below.

Potential Savings from Salary Accounts	FY26	FY27
1222 Personnel Clerk <i>(to be vacated)</i>	\$157,269	\$163,568
1840 Policy Research Specialist <i>(to be vacated)</i>	\$148,156	\$154,230
1230 Training Design Specialist <i>(to be vacated)</i>	\$203,589	\$211,738
1823 Senior Program Administrator <i>(remain vacant)</i>	\$204,346	\$212,524
Two 1684 Auditor positions at 50 percent allocation each <i>(Reallocate 50% of the positions' salary and benefits costs from the Operating Budget to the Election Campaign Fund. The remaining 50% costs will continue to be allocated to the Operating Budget.)</i>	\$207,215	\$215,499
Savings from three vacancies (1406, 1822, and 1823) and step adjustments funding <i>(after accounting for attrition savings target in the baseline budget)</i>	\$120,319	\$113,859
Total	\$1,040,894	\$1,071,418

Additionally, the following non-position changes will also be required to meet the targets.

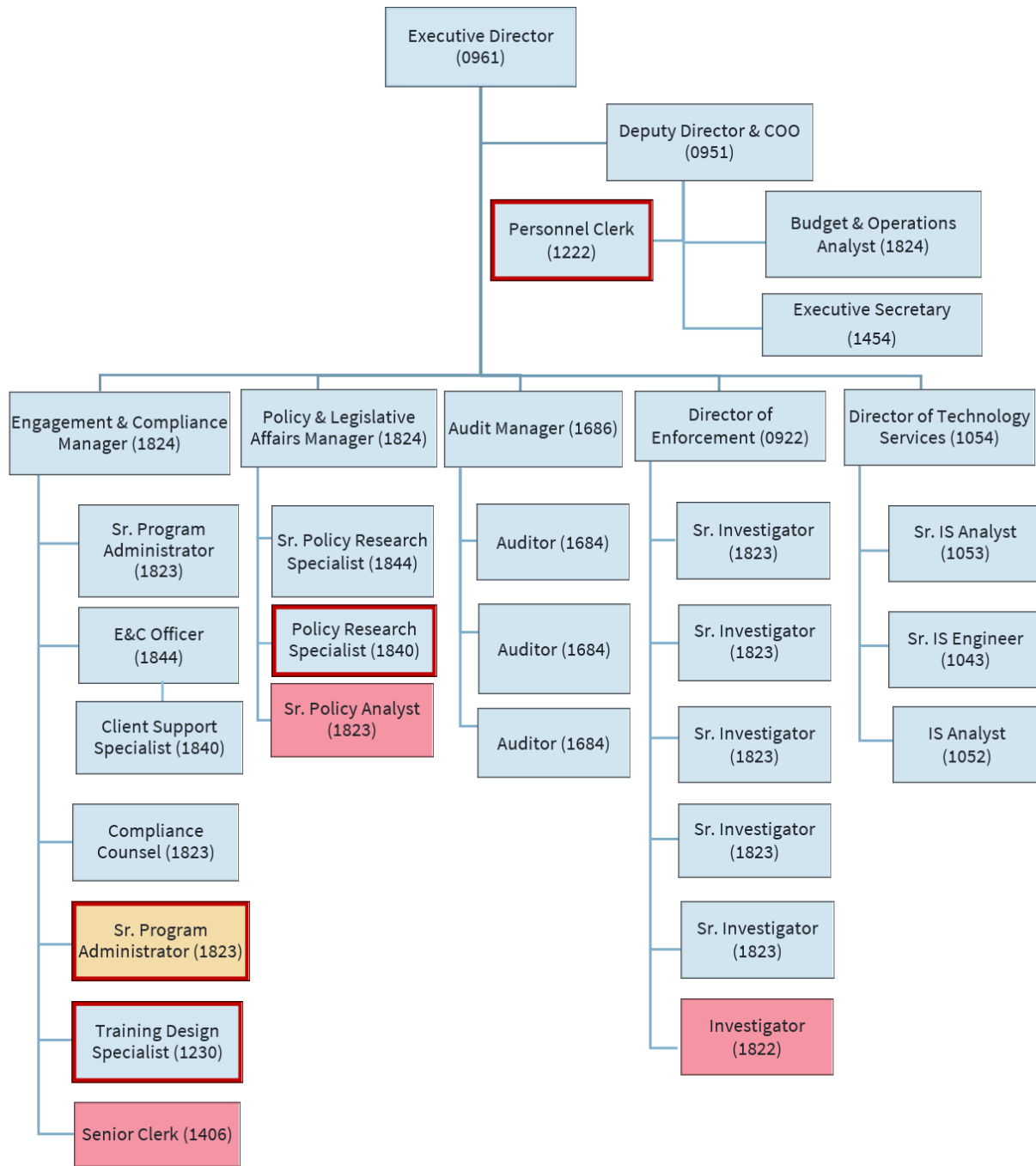
Potential Savings from Non-Salary Accounts	FY26	FY27
New work order with the City Administrator’s Office <i>With the elimination of funding for the 1222 Personnel Clerk position, payroll functions will need to be supported through this workorder.</i>	\$(47,807)	\$(49,734)
Reallocate Netfile Campaign Finance System Maintenance Fees to the Election Campaign Fund <i>Charge to Election Campaign Fund instead of Non-Personnel Services account under Operating Budget to support system administration costs for the Public Financing Program as authorized under SF Campaign and Governmental Conduct Code Section 1.138.</i>	\$40,519	\$31,877
Reduce Netfile Maintenance Costs for the Campaign Consultant System <i>This system will be discontinued by the end of FY25 as it was replaced by a new system in December 2024.</i>	\$15,194	\$15,194
Reduce the workorder with the Controller’s Office <i>The Controller’s Office provides accounting services to the Ethics Commission through this work order, which will be reduced to reflect current service levels.</i>	\$25,000	\$25,000
Reduce the workorder with the Department of Technology (DT) <i>This adjustment will reduce the budget for technology equipment support provided by DT, aligning costs with current service levels.</i>	\$4,985	\$4,985
Reduce funding for Professional Services <i>This will reduce the budget available for vendor services such as language translation.</i>	\$13,685	-
Reduce funding for Copy Machine <i>Reducing the number of Ricoh copiers in the Commission’s office from two to one will result in these savings.</i>	\$1,260	\$1,260
Reduce funding for Materials & Supplies <i>This will reduce the budget available to purchase office technology equipment.</i>	\$6,270	-
Total	\$59,106	\$28,582

These reductions will contribute to meeting the 15 percent budget cut target, totaling \$1.1 million in FY26 and FY27.

15% Target Reduction: Position Changes and Impact

The positions impacted by the Mayor’s target cuts are shown in the organization chart below.

Ethics Commission - FY26-FY27 Organization Chart with 15% Target Reduction



- 28 positions are currently filled
- 25 positions will be funded under this scenario

- Vacant position to be filled pending budget approval
- Positions held vacant for attrition savings
- Filled positions
- Positions impacted by the target cuts

Impact of 15% Target Reductions

The 15 percent target cut requirements will impact the Ethics Commission's programs and operations as described below.

Funding for two positions in the Engagement and Compliance Division will be eliminated.

- The 1823 Senior Program Administrator position will remain vacant, and the 1230 Training Design Specialist position will be vacated and cannot be reclassified as is currently needed (as described in Section II). This will affect the Commission's ability to provide effective and timely compliance guidance, training, and online materials to City officers and employees, political campaigns, and others subject to the laws administered by the Commission.
- Additionally, the division will no longer have the capacity to administer the Major Developers, Campaign Consultants, and Trustee Candidate Disclosure programs. The Commission will need to work with the Mayor and the Board of Supervisors to pursue legislative steps to discontinue these programs so that Commission staff resources can be allocated to the Commission's major programs of ethics, campaign finance, Form 700, and lobbying.
- Staff will also need to explore further efficiency savings, including by eliminating the labor-intensive adjustable spending limit feature of the City's public financing program and by merging the permit consultant and lobbyist disclosure programs into a single system.
- Due to limited capacity in the Division, the Commission will also need to discontinue the custom filing process for Form 126f4 (Notification of Contract Approval), which was created to automate internal business processes in the Mayor's Office and the Board of Supervisors to assist those offices with compliance. Those offices will have to either adopt the standard filing process used by other elected officials or assume ownership and maintenance of the custom process.

Funding for the 1840 Policy Research Specialist position in the Policy Division will be eliminated.

- This reduction will impact the Commission's ability to conduct research, data analysis, and evaluation of current City laws to ensure the effectiveness of the Commission's programs.
- This will impact potential collaborations with City policymakers who are interested in reviewing and changing City ethics laws.

Positions in the Enforcement Division cannot be reclassified (as described in Section II) to achieve continued improvements.

- This will jeopardize the recent improvements to the Division's case resolution timelines and the quality of its case outcomes. For example, the Commission would likely lack the staffing capacity to carry out administrative hearings if these positions are not filled with qualified incumbents on an ongoing basis.

1052 IS Analyst position in the Electronic Disclosure and Data Analysis Division cannot be reclassified to 1042 IS Engineer position (as described in Section II).

- The Commission will not have the capacity to develop technology solutions to implement automation to support enhanced enforcement and audit functions.

The Commission will not have funding to support disclosure systems and technology services.

- Netfile licensing costs for city-wide Form 700 filers, which include approximately 6,000 city officials and employees, will not be funded. Previously funded through the COIT E-Filing Conversion Project, this funding source will be depleted by early 2026.
- Necessary software services and technology equipment cannot be purchased.

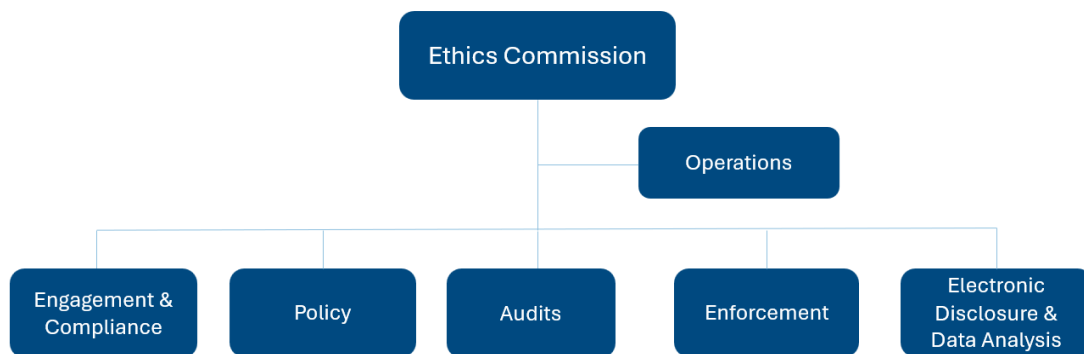
ATTACHMENT A:

About The Ethics Commission

The San Francisco Ethics Commission was created directly by the City’s voters with the passage of Proposition K in November 1993. The Commission is composed of five members, with one each appointed by the Mayor, the Board of Supervisors, City Attorney, District Attorney and the Assessor-Recorder. The Commission’s mission is to practice and promote the highest standards of integrity in government by delivering impactful programs that promote fair, transparent, and accountable governmental decision making for the benefit of all San Franciscans.

Through its staff, the Commission is responsible for the independent and impartial administration and enforcement of laws related to campaign finance, governmental ethics, conflicts of interests, and registration and public disclosure reporting by lobbyists, campaign consultants, permit consultants, and major developers. The Commission acts as filing officer for over 80 different types of public disclosure statements; audits 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, officers, employees and the general public. The Commission also administers a Public Campaign Financing Program which provides partial public financing for qualified candidates for Mayor and the Board of Supervisors.

Functional Divisions



Engagement and Compliance: The Engagement and Compliance Division provides information and guidance to city officers and employees, candidates for public office, the public, and others to help them understand and comply with their responsibilities under the law. This division provides trainings, publishes compliance materials, and provides informal advice that applies the City’s ethics, campaign finance, and lobbying laws to circumstances faced in practice. The Commission also acts as filing officer for a wide range of public disclosure statements filed by designated local officials, candidates seeking local office, and lobbyists who seek to influence governmental decisions in the City and County of San Francisco.

Policy: This Division leads the Commission’s public policy research, analysis, and legislative work. It is responsible for analyzing how well current laws and programs are achieving their intended purposes and formulating new regulatory and legislative approaches to ensure the City’s political reform laws are strong, workable, and enforceable. Related duties assigned to the Division include media relations, interpreting and advising on the law, and stakeholder outreach and engagement. The Division also administers the Commission’s opinion and waiver programs.

Audits: The Audit Division is responsible for conducting campaign audits pursuant to the Commission’s Charter authority and mandate under City law to determine whether committees have materially complied with applicable requirements of State and local laws. The Division also administers the Public Campaign Financing Program qualification and claim review process to determine candidate eligibility and public funds disbursements. In addition, the Audit Division is responsible for conducting audits required under City law related to the lobbyist registration.

Enforcement: To fulfill the Ethics Commission’s oversight mandate as an independent administrative enforcement agency, the Enforcement Division is charged with ensuring fair, thorough, and timely investigations and case outcomes that serve as an effective deterrent and promote accountability in government. The Division has responsibility to identify, investigate, and remedy unlawful conduct within the scope of the Commission’s jurisdiction. The Division’s investigators are responsible for investigating alleged violations of the law to ensure allegations are fully and objectively evaluated and that those who violate the law are held publicly accountable for their actions. This can include imposition of monetary penalties levied by the five-member Ethics Commission as provided for under the law.

Electronic Disclosure and Data Analysis (EDDA): This Division serves filers, Commission staff, and the public by providing integrated and effective technology solutions for compliance, agency operations, and access to electronic disclosure records and data. The EDDA Division develops integrated technology solutions to support the Commission’s various programs. The Division maintains the electronic disclosure platforms for campaign finance, lobbyist, Form 700, and other filings. The Division also ensures that the public has complete and timely access to the disclosures, such as through the campaign finance data dashboards and the City’s open data portal.

Operations: This Division is responsible for leading department-wide initiatives and operations, including budget development, financial accounting, procurement, contracting, performance reporting, payroll, human resources, recruitment, office management, and other administrative functions. The Division also supports the Commission’s front-office functions as the first point of contact for the public and assists with facilitating the Commission’s public meetings. The Division also helps establish and implement office policies and standard operating procedures to strengthen departmental business processes.