San Francisco
Ethics Commission

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Date: April 7, 2025

To: Members of the Ethics Commission

From: Kyle Kennedy, Engagement & Compliance Manager

Subject: Agenda Item 5: Quarterly Engagement & Compliance Report

Summary & Action Requested

This report provides general programmatic updates and data about the matters handled by the Commission's Engagement & Compliance Division.

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

Engagement & Compliance Report

This report will cover work undertaken recently by staff in the Engagement & Compliance Division (E&C). Below you will find metrics for our online support portals, feedback received on the new annual ethics training, and initiatives the Division is working to implement.

Support Portal Data

Calendar Year 2024

CY24 was the first year E&C utilized online support portals to provide advice, guidance, and technical assistance in all programs. Staff had previously implemented a support portal for the SEI (Form 700) program, which made requests easier to track and respond to timely. Building on this success, the Division launched the Campaign Finance & Campaign Consultants Support Portal in March 2024, followed by the Lobbyist Support Portal in April 2024. Finally, the Ethics Advice Portal for City Employees was launched in August 2024.

In total, 1,343 tickets were received through these support portals throughout CY2024. The chart below summarizes the number of tickets by portal:

Chart 1: Support Portal Tickets in CY24 (by program area)

Program	Count of Support Tickets by Program
Campaign Finance and Campaign Consultant	300
Ethics Advice	158
Lobbyist	109
Major Developers and Permit Consultants	10
SEI Form 700 and Departmental Gifts	766
Grand Total	**1,343**

The portal also allows staff to add labels to track the subject or topic of a question, giving E&C better insight into the potential need for new or revamped compliance or technical assistance materials in certain program areas. It also allows staff to more easily reference prior questions and answers in order to increase efficiency and ensure consistent responses over time. The chart below shows the top three most common topics in the Campaign Finance, Ethics Advice, and SEI (Form 700) programs:

Chart 2: Most Common Advice Topics in CY24 (by program area)

Program	Topic	# of Tickets
Campaign Finance	Campaign Statements	79
Campaign Finance	Contributions	51
Campaign Finance	Communications/Disclaimers	50
Ethics Advice	Gifts	57
Ethics Advice	Incompatible Activities/AWD	9
Ethics Advice	Secondary Employment	9
SEI (Form 700)	Filing Officer Support	56
SEI (Form 700)	Leaving Office	47
SEI (Form 700)	Department Transfers	46

The portals have also allowed the Division to track the time it takes to fully answer a requestor's question and resolve the support ticket. Below is the average time to resolution in all programs for CY24:

Chart 3: Average Time to Resolution in CY24 (by program area)

Portal	Time to Resolution
Campaign Finance and Campaign Consultant	4 business days
Ethics Advice	13 business days
Lobbyist	2 business days
Major Developers and Permit Consultants	12 business days
SEI Form 700 and Departmental Gifts	6 business days

Quarter 1, Calendar Year 2025

Between January 1 and March 31, E&C received a total of 761 tickets across the five support portals, a significant increase from the 344 received during the same time period last year, which the Division attributes to the new portals launched after Q1 CY24. The chart below shows the number of tickets by program area:

Chart 4: Support Portal Tickets in Q1 CY25 (by program area)

Program	Count of Support Tickets by Program
Campaign Finance and Campaign Consultant	80
Ethics Advice	77
Lobbyist	32
Major Developers and Permit Consultants	2
SEI Form 700 and Departmental Gifts	570
Grand Total	**761**

Staff have continued to track the topics of their questions to better understand the needs of the regulated community. Below are the three most common topics in the SEI (Form 700), Campaign Finance, and Ethics Advice programs:

Chart 5: Most Common Advice Topics in Q1 CY25 (by program area)

Program	Topic	# of Tickets
Campaign Finance	Campaign Statements	39
Campaign Finance	General Guidance	12
Campaign Finance	Registrations	4
Ethics Advice	Gifts	29
Ethics Advice	Incompatible Activities/AWD	10
Ethics Advice	Event Tickets	6
SEI (Form 700)	Ethics/Sunshine Training	146
SEI (Form 700)	Filer Support	82
SEI (Form 700)	Filing Officer Support	72

The Division continues to track the time to resolution for tickets received in the portals to ensure efficient, high-quality service. Below is a chart summarizing the average times to resolution in each program:

Chart 6: Average Time to Resolution in Q1 CY25 (by program area)

Portal	Time to Resolution
Campaign Finance and Campaign Consultant	6 business days
Ethics Advice	10 business days
Lobbyist	4 business days
Major Developers and Permit Consultants	2 business days
SEI Form 700 and Departmental Gifts	4 business days

Form 700 Filing Season

The Division's main focus from January through March was the successful administration of the Form 700 filing season. Staff held two training sessions for Filing Officers on February 4 and 6, to provide information, answer questions, and ensure they were well equipped to successfully administer this year's disclosure process at their departments. Additionally, E&C Staff held two information sessions for Filers on February 20 and 27 to ensure they were equipped to complete their filings timely. This year was the first time all Form 700 filers were required to complete an annual ethics training created by the Ethics Commission, and a major focus of these trainings was ensuring Filers and their Filing Officers understood the process for completing the required training in NetFile.

In addition to these instructor-led training sessions, E&C also implemented a robust communication plan to ensure filers received sufficient reminders of their filing requirements. Reminders were sent to filers who had not completed their requirements on February 10, February 18, February 27, March 3, March

17, March 24, and March 31. Staff also proactively reached out to Commission Secretaries—or other points-of-contact if a commission's secretary was not listed online—on March 26 to inform them of the members who had not yet filed and would be disqualified from meeting participation if they did not file by April 1. In that communication, Staff also reminded the secretaries of their obligation to announce the names of disqualified members at the beginning of meetings.

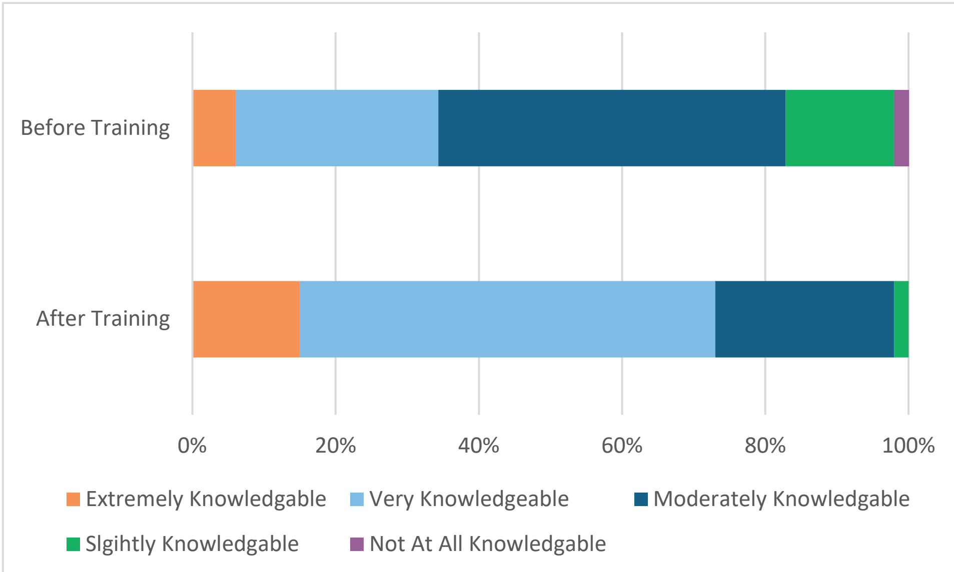
E&C Staff are now implementing the post-deadline procedures for the program sending non-filer notices and supporting the work of Filing Officers as they try to increase compliance within their departments. Staff will hold two additional training sessions for Filing Officers on April 8 and April 10 focused on their requirement to conduct basic reviews on 20% of on-time filings and 100% of late filings. The sessions will cover how the reviews should be conducted, methods for pulling random samples to review, and tools they can use to help complete and track their reviews more easily. On May 1, Staff will post the public list of names of non-filers to the Ethics Commission website.

Annual Ethics Training Module Feedback Survey

As mentioned, this year is the first that all City employees and officers who file the Form 700 are required to complete an ethics training module created by the Ethics Commission. Staff were interested in gathering user feedback to further improve the training in future years. To facilitate this, staff created a brief, optional survey for users to complete at the end of the training. The survey received 465 responses through April 1, representing about 10% of individuals who completed the training before that date.

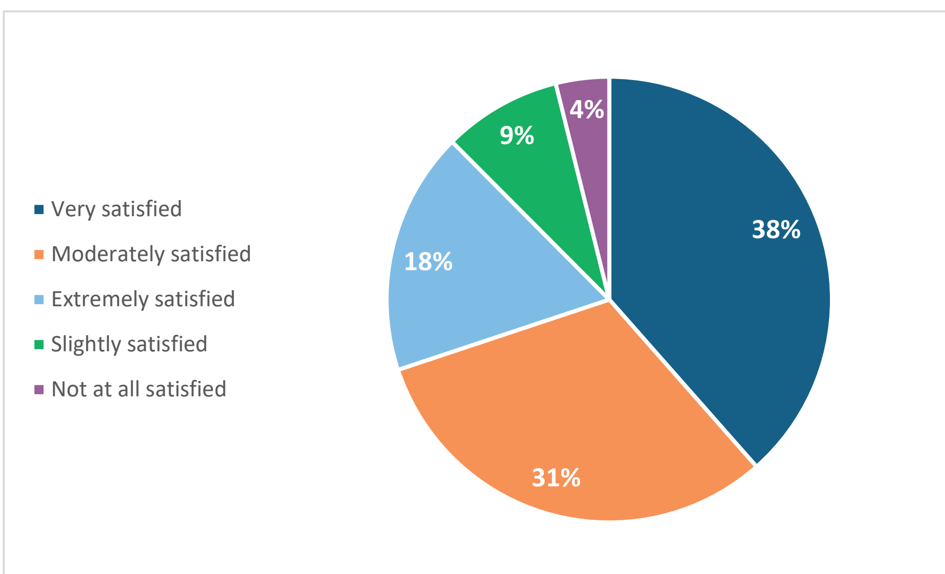
When asked to rate their knowledge of the City's ethics rules before the training, 65% of respondents said they were moderately (48%), slightly (15%), or not at all (2%) knowledgeable of the rules. After the training, 73% of respondents rated themselves very (58%) or extremely (15%) knowledgeable. This significant increase in self-rated knowledge among respondents reflects the importance of providing standardized educational resources to City officers and employees to improve awareness of important ethics rules. The graph below shows the change in user self-rating before and after the training:

Chart 7: Self-Rated Level of Knowledge of Ethics Rules Among Trainees



Respondents were also asked to rate their satisfaction with the format, style, and functionality of the training. Their responses are shown in the graph below:

Chart 8: Satisfaction with Style, Format, & Functionality of the Annual Ethics Training



In addition to rating their satisfaction, respondents were given the opportunity to provide suggestions to improve the training module. Common pieces of feedback included adding a pause button, providing a transcript of the content, including more examples to better contextualize the rule, and incorporating a glossary of common terms. E&C staff plan to explore all of these when making updates to the module ahead of next year.

Summary of Ethics Laws

A provision of City law added by Proposition D requires City departments, boards, and commissions to annually distribute to their employees a summary of ethics laws created by the Ethics Commission. E&C staff created the summary as both a webpage and printable PDF accessible on the Ethics Commission's website.

The Commission partnered with the Department of Human Resources (DHR) to directly distribute the summary to all employees by email on March 27th. E&C staff subsequently distributed the summary to all City officers by email on March 31st. This direct email distribution of the summary ensured that all City officers and employees received the summary, and it alleviated the need for departments to be an intermediary and distribute it to their respective staffs, which would have had an increased burden on departments and made it more likely that some employees may not receive the summary.

On April 1st, Director Ford emailed all of the City's department heads to inform them that the summary had been distributed directly to all officers and employees and that no action was required on the part of departments. The Commission is grateful to DHR for their collaboration on the dissemination of this important information.

Guidance Webpage Updates

One of E&C's major ongoing priorities is to ensure that the Commission's website contains useful and comprehensive information about the rules the Commission administers. The website should allow regulated persons to self-direct to relevant content and answer many or most of their own questions. The website should also provide the public and media with easy access to information about the rules.

Continuing work that began during the implementation of Prop D, E&C staff have been working to streamline and update guidance pages on our website. Staff recently updated the Conflicts of Interest page to provide more comprehensive information on rules and relevant definitions and worked to streamline the Post-Employment and Post-Service Restrictions page for clarity. The timing of these updates also supported the Form 700 and ethics training season, when thousands of officers and employees were taking the mandatory ethics training and may have been looking for more information. The Division is beginning work on new pages for rules related to additional employment and relationship disclosure requirements and plans to update and streamline the City Contracts once those new pages are completed.

The Division is also collaborating with the Electronic Disclosure and Data Analysis (EDDA) Division to improve the accessibility of compliance materials, particularly in the Campaign Finance Program. Currently, the Candidate Guide exists only as a PDF, which does not comply with the City's Digital

Accessibility and Inclusion Standards (DAIS). E&C will be working closely with EDDA over the coming months to bring our materials into compliance with DAIS by creating a webpage-based guide. Creation of the guide in this new format will provide an opportunity for Staff to examine existing webpages to identify duplicative, unclear, or unnecessary information that can be streamlined for clarity. The Division is aiming to complete work on the new version of the candidate guide by August 31, so it is ready and available for the 2026 Election Cycle.

Training Program

Another major focus for E&C is to improve the efficacy and reach of the training's delivered by the Ethics Commission. In March, E&C Staff delivered two live training sessions to members of the Municipal Executives Association (MEA) on important ethics rules they should be aware of as City leaders, with a total of 46 participants across both trainings. These trainings are offered to MEA members annually, and E&C Staff look forward to collaborating with MEA on next year's training program.

E&C is working to increase the Division's capacity to provide live, instructor-led trainings for City officers and employees to supplement the Annual Ethics Training that all Form 700 filers are required to complete. Historically, the City Attorney's Office has delivered these instructor-led trainings to departments, boards, and commissions; recently, Staff from the Division have been shadowing Deputy City Attorney's during these training sessions to learn from their experience and expertise. Over the next calendar year, E&C will be working to take more responsibility for the delivery of those trainings to officers and employees. Additionally, the Division will be coordinating with the City Attorney's Office and the Department of Human Resources to ensure consistent communication to City officers and employees regarding their training requirements.

In addition to trainings for City officers and employees, E&C will also be evaluating the other trainings administered by the Division over the next calendar year, including the Contact Lobbyist Training and the Candidate & Treasurer Trainings. The Division will be exploring ways to improve the content for the Contact Lobbyist Training and will be reevaluating the training process in the Campaign Finance Program to examine the feasibility of offering a combination of live and asynchronous trainings.

Finally, as mentioned above the Division will be using the feedback received from the Annual Ethics Training user survey to enhance and improve that training module ahead of next year.

E&C Operational Protocols

E&C is currently working to document all processes and procedures related to the work of the Division. Protocols for completing projects, using support portals to provide advice & guidance, administering disclosure programs, and planning and executing training sessions are currently being codified. The goal of this effort is to provide clarity to Staff and improve efficiency through standardized and streamlined processes. This work is targeted for completion by the end of FY25.