



# San Francisco Ethics Commission

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Date: August 4, 2025

To: Members of the Ethics Commission

From: Kyle Kennedy, Engagement and Compliance Manager

Subject: Agenda Item 5: Quarterly Engagement and Compliance Report

## Summary and Action Requested

This report provides general programmatic updates and data about the matters handled by the Commission's Engagement and Compliance Division. The report includes metrics for the Commission's online support portals, an update on current initiatives, and an overview of projects planned for the next fiscal year.

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

## FY25 Support Portal Data

As mentioned in the previous [Engagement and Compliance Report](#) provided in April, Engagement and Compliance now utilizes online support portals to manage the various support requests fielded by the Division. These requests primarily include troubleshooting technical issues for filers, providing fact-based compliance advice to City officers and employees, and assisting the public in accessing and understanding disclosure filings. The varied responsibilities of the Division necessitate close collaboration, and the use of these portals and a centralized ticketing system have had a positive impact on team efficiency. Below are metrics and charts that summarize the volume and variety of requests managed by Engagement and Compliance.

In total, 2,024 tickets were received through these support portals throughout FY2025. The chart below summarizes the number of tickets by portal:

Chart 1: Support Portal Tickets in FY25 (by program area)

Program	Count of Support Tickets by Program
Campaign Finance and Campaign Consultant	320
Ethics Advice	262
Lobbyist	103
Major Developers and Permit Consultants	10
SEI Form 700 and Departmental Gifts	1,329
<b>Grand Total</b>	<b>2,024</b>

The SEI (Form 700) program continues to represent the greatest number of support requests, with more than 1,300 requests submitted. Additionally, Engagement and Compliance staff handled more than 300 support requests related to the Campaign Finance program.

Chart 2: Most Common Request Topics in FY25 (by program area)

Program	Topic	# of Tickets
Campaign Finance	Campaign Statements	120
Campaign Finance	Communications/Disclaimers	39
Campaign Finance	Contributions	34
Ethics Advice	Gifts	116
Ethics Advice	Incompatible Activities/AWD	50
Ethics Advice	Secondary Employment	15
SEI (Form 700)	Ethics/Sunshine Training	431
SEI (Form 700)	Filing Officer Support	206
SEI (Form 700)	Filer Support	157

Engagement and Compliance staff continue to track the topics of requests received in all programs in order to better understand the educational needs of the regulated community. The Division will be using insights from the data collected throughout FY25 to help plan and prepare for FY26 and identify potential trainings, resources, and other compliance materials to create.

Chart 3: Average Time to Resolution in FY25 (by program area)

Program	Time to Resolution (in business days)
Campaign Finance and Campaign Consultant	Approx. ½
Ethics Advice	3.5
Lobbyist	Approx. ½
Major Developers and Permit Consultants	< ½
SEI Form 700 and Departmental Gifts	< ½

Engagement and Compliance continues to track metrics related to the requests received through the support portals. The average time to resolution for requests in all programs other than ethics advice was less than half a business day. Ethics advice requests, which generally require additional staff time to research the facts of the question asked, had an average time to resolution of 3.5 business days. While this meets the overall Divisional goal of maintaining a time to resolution of less than 5 business days, staff will continue to create resources and streamline processes in an effort to further reduce our average time to resolution in the ethics advice program.

These resolution times reflect the amount of time a request is in the “Waiting for Support” and “In Progress” status before being resolved. When staff request additional information needed to provide a complete and accurate answer to the question asked, the system will pause counting towards resolution until the requestor responds.

## Annual Ethics Training Update

City officials who took the Commission’s annual ethics training were invited to complete an optional survey to provide feedback on the content, format, and functionality of the training. Division staff reviewed the feedback received and have been working to redesign and update the annual ethics training to improve clarity and create a better user experience.

Staff are working to break the training up into a series of shorter videos that will function more seamlessly within the NetFile system and are reorienting content to move away from theoretical explanations and towards practical implications of the rules. The updated training will incorporate plain language definitions and will include more examples and scenarios to provide real-world context for ethics laws. Content will also be organized in a more approachable way by distinguishing between rules that officials need to be aware of when they are at work, outside of work, and after City service. Finally, training participants will be provided with additional compliance resources after each video related to the topics discussed to allow for additional self-directed learning.

## Disclosure Programs

### Lobbyists

Division staff have been working to update the required training lobbyists must complete after they qualify and register with the Ethics Commission. The updated version of the training will improve the clarity and cohesion of the content and will enhance the audio and visual user experience. Staff are using PowerPoint to create a dynamic, engaging training video that will succinctly present the rules lobbyist must know and follow. This new methodology for training content creation has proven successful and is now also being utilized in the annual ethics training update discussed above. The Division looks forward to continuing to explore new, creative methods for producing high-quality educational content.

### Campaign Finance

Engagement and Compliance staff have been working to successfully administer committee disclosure filings for the District 4 recall election in September. Division staff have published a [filing schedule](#), provided training materials to committees, and have fielded questions through the Campaign Finance Support Portal to enhance compliance. Staff look forward to continuing to support the compliance of committees through the election on September 16, 2025.

With another election year approaching in 2026, Engagement and Compliance staff are working to streamline and improve processes for smoother administration of disclosure filings. One issue that the Division intends to address is the volume of non-responsive accounts that exist in the Commission's electronic filing system. These non-responsive accounts are generally connected to committees that failed to properly terminate after registering with the Commission; because the committees failed to terminate properly, these accounts are still assigned filing deadlines and appear on non-filer reports. This creates unnecessary complexity in conducting compliance and enforcement activities and negatively impacts the Commission's overall compliance metrics. Division staff have worked to identify committees that meet the criteria for administrative termination by the FPPC and are working to begin the administrative termination process for these committees. The Division hopes to have these non-responsive committees terminated before the January 2026 semi-annual filing deadline.

### Statement of Economic Interest (Form 700)

At the end of FY25, Engagement and Compliance staff undertook two projects to streamline administrative processes in the SEI (Form 700) program. The first addressed inefficiencies in the assuming office process for City officers; the second addressed structural limitations to a department's ability to designate positions as Form 700 filers.

Previously, when an appointment was made to a City board or commission, two forms were submitted to the Ethics Commission to facilitate the filing of an Assuming Office Form 700: the Notice of Appointment or Reappointment (NAR) form and the Filer Electronic Account Setup (FEAS) form. Both

forms included almost identical fields, with the FEAS including a few additional fields for contact phone and email addresses. City officials provided feedback that the process was not intuitive and caused some confusion among both filing liaisons and filers. Staff analyzed both forms and updated the NAR form to include the fields that existed only on the FEAS form. In addition to these updates to the forms' content, Engagement and Compliance staff also worked closely with the EDDA Division to implement a process for submitting this form directly via the Form 700 Support Portal. We are confident this change will improve the efficiency for filing liaisons, filers, and Ethics Commission staff.

The second recent improvement to the Form 700 program is related to the biennial code review, which is the process of reviewing and updating the list of designated positions in each City department every two years. Following the completion of the 2024 review process, some departments contacted the Ethics Commission regarding other changes they wanted to make to their code section; however, no mechanism to allow the departments to make these changes existed beyond one-off legislative amendments, which are not an ideal solution. To address this, Engagement and Compliance staff looked to the FPPC Form 804, which allows new positions to be designated as Form 700 filers before they are added to the conflict of interest code. In consultation with the City Attorney's Office, Division staff developed the [SEI Designation Form](#) to allow department heads to designate positions as filers outside of the biennial code review process. Division staff plan to keep track of all positions designated via this new form so a list can be provided to the City Attorney's Office during the next biennial code review to ensure all positions are captured in the appropriate departmental conflict of interest code.

## FY26 Projects

### Engagement and Compliance Wiki

The work of the Engagement and Compliance Division is both wide-ranging and multifaceted, and a key goal for staff over the next year will be to create written resources that allow for more effective collaboration within the Division. In furtherance of this goal, Staff will be working to document information related to specific program operations in a centralized repository called the Engagement and Compliance Wiki. This Wiki will include how-to articles for technical processes, instructions and checklists for administrative procedures, and guides to help staff research advice questions more quickly. This level of protocol documentation has not previously existed in the Division and, once created, will allow for more collaborative, cross-functional work among the team.

### Disclosure Program Manual Conversion

City policy requires departments to comply with the City's Digital Accessibility and Inclusion Standards (DAIS) by the end of FY26. Under the DAIS requirements, information can no longer exist solely in PDF format due to the format's limitations related to both mobile browsing and screen reader technology. Historically, Engagement and Compliance has produced a number of compliance materials that exist only as PDFs, including manuals related to disclosure programs administered by the agency. Engagement and Compliance will be working over the next year to convert three manuals to web format to increase accessibility: the Candidate Manual, the Lobbyist Manual, and the SEI (Form 700) Filing

Officer Manual. Staff plan to use this conversion project as an opportunity to identify areas of substantive improvement within each manual and will harmonize the manuals with existing webpages to ensure material is covered thoroughly but is not duplicated throughout the website.

## Campaign Finance Training Program

Engagement and Compliance staff will be working to streamline and standardize the training process for the campaign finance program ahead of the 2026 election year. In the past, trainings for campaign committees have taken on a variety of formats, and the Division plans to implement a single training plan that will be effective and sustainable for future elections. The Division recognizes the paramount importance of training for candidates and treasurers, particularly for first time candidates who may be less familiar with the rules and processes related to running for office. Staff will work to develop a standard training program for candidate, primarily formed, and general purpose committees that best meets the needs of these committees and will explore both instructor-led and on demand training options. A key goal of this training program will be to offer ample opportunities for training at a variety of days and times throughout the election year so candidates and treasurers can fulfill their obligation at a time that works best for their schedule.