



San Francisco Ethics Commission

25 Van Ness Avenue, STE 220
San Francisco, CA 94102-6053
ethics.commission@sfgov.org
415-252-3100 | sfethics.org

Date: November 10, 2025

To: Members of the Ethics Commission

From: Ryan Abusaa, Senior Policy Research Specialist

Re: **AGENDA ITEM 06 – Discussion and possible action regarding request for waiver of post-employment restrictions for Chris Block.**

Summary and Action Requested

This memo provides background and analysis to assist the Commission in determining whether to grant a post-employment waiver to Chris Block. The Commission should evaluate Mr. Block's waiver request, as required by city law, and consider whether granting Mr. Block a waiver would create the potential for undue influence or unfair advantage.

Based on its review of Mr. Block's request and applicable law, Staff recommends that the Commission consider approving a limited waiver for Mr. Block.

Background

On October 22, Chris Block sent a formal request to the Commission asking that certain post-employment restrictions under Section 3.234 of the Campaign and Governmental Conduct Code (C&GCC) be waived. Mr. Block previously served as the Manager of Housing Placement within the City's Department of Homelessness and Supporting Housing (HSH). He left City service on May 2, 2025, and began a new role as a Senior Adviser at the San Francisco Housing Accelerator Fund (HAF) on May 5, 2025. Mr. Block's waiver request is included as **Attachment 1**. The facts included in this memorandum are drawn from Mr. Block's written request, and additional follow-up correspondence received via email.

Applicable Law

The City has rules for what current and former City officers and employees can do after they leave City service. These rules further the purpose of the Campaign and Governmental Conduct Code, which per [Section 3.200](#), is chiefly to "promote fairness and equity for all residents and to maintain public trust in governmental institutions." The law seeks to ensure "that public officers and employees [are] independent, impartial, and responsible to the people and that public office and employment [is] not...used for personal gain." The Code also asserts that government decisions by City officers and employees "should be, and should appear to be, made on a fair and impartial basis." Under [Section 3.234](#) and [its supporting regulations](#), these post-employment and post-service restrictions include a one-year restriction on communicating with the City official's former department with the intent to influence a government decision.

One-Year Restriction on Communicating with Former Department

[Section 3.234\(a\)\(2\)](#) of the C&GCC prohibits former employees from, with the intent to influence a government decision, communicating on behalf of any other person (except the City) with any officer or employee of the department for which the former employee served, for one year following the termination of their employment with the City. Ethics Commission [Regulation 3.234-2](#) outlines the scope of this restriction and provides guidance on determining whether this one-year ban applies.

This one-year post-employment communication ban furthers the goals of the C&GCC by ensuring that former City officers and employees cannot use their recent position with a department to unduly influence or appear to influence the actions of that department. Without this rule, officials and employees could leave City service and immediately advocate for their new employer by communicating with their former department to affect decisions in favor of their new employer. This outcome would exemplify the “revolving door” issue arising from the public-to-private movement of individuals.

This restriction is designed as a modest but fundamental safeguard to support the fairness of governmental decision making and to preserve the public’s trust in the integrity of governmental decisions. It recognizes that former City officers and employees can have unique knowledge and access that could unfairly advantage the ability of their new employer or clients to secure beneficial outcomes in a way not available to other entities or organizations in the same field who also may seek opportunities to do business with the City.

Waiver Authority of the Ethics Commission

[Section 3.234\(c\)\(1\)](#) of the C&GCC grants the Commission the ability to waive the one-year restriction on communicating with former department, “if the Commission determines that granting a waiver would not create the potential for undue influence or unfair advantage.”

Ethics Commission [Regulation 3.234-4](#) further outlines the process for submitting and potentially approving post-employment waivers. The regulation specifies that the Commission “shall not approve any request for a waiver from the permanent or one-year bans made under subsection 3.234(c)(1) unless the Commission makes a finding that granting such a waiver would not create the potential for undue influence or unfair advantage.” When determining the granting of such a waiver would create the potential for undue influence or unfair advantage, the regulation specifies that the Commission may consider:

- the nature and scope of the communications the individual will have with his or her former department, board, commission, office, or unit of government;
- the subject matter of such communications;
- the former position held by the officer or employee;
- the type of inside knowledge that the individual may possess; and
- any other factors the Commission deems relevant.

The Commission should consider granting a waiver only if it finds that the waiver “would not create the potential for undue influence or unfair advantage” and would further the purposes of the C&GCC.

Waiver requests are evaluated based on the facts that are provided in the request. These facts allow the Commission to evaluate whether a waiver is appropriate and must therefore be complete and accurate. Any waiver that the Commission grants is limited to the facts provided, and, should the facts change, the requestor should seek an updated waiver from the Commission.

Facts Presented in the Request

In his waiver request, Mr. Block describes his work history, previous role with the City, and his current role with the San Francisco Housing Accelerator Fund (HAF). Mr. Block was previously the Manager of Housing Placement at the City’s Department of Homelessness and Supporting Housing (HSH), having begun his City service as a temporary employee with the Department of Emergency Management during the COVID-19 pandemic and eventually joining permanent civil service under HSH. Mr. Block now serves as a Senior Adviser at HAF.

The project work that necessitates the waiver request is a review of the City’s permanent supportive housing. The review is being led by the Mayor’s Office of Housing and Community Development (MOHCD) and involves several City departments including HSH and the Department of Public Health. Mr. Block’s current employer, HAF, will participate as the sole non-governmental partner in this process. Mr. Block has stated that HAF is not seeking to influence the City’s decision-making process for contracting or financial gain – and that the review of the City’s permanent supportive housing portfolio is part of an existing partnership with MOHCD for which HAF does not charge for its services.

Should the Ethics Commission grant Mr. Block a waiver, he would be involved with the project and communicating with his former department and could have overlap with matters he is familiar with given his previous City service. Mr. Block has confirmed that he has been present in online meetings that included City staff and employees from HSH, but that he has been careful not to communicate with them during these meetings.

Analysis

The Need for a Waiver to Perform the Duties Mr. Block Describes

Based on the facts presented in Mr. Block’s waiver request, Staff agrees that a waiver for the one-year post-employment communication ban would be necessary for Mr. Block to carry out the described duties of his current position with HAF for the six-month duration of the review project.

Based on the guidance from Ethics Commission [Regulation 3.234-2](#), the one-year post-employment communication ban would apply to Mr. Block’s new duties at HAF, since:

1. Mr. Block is a former City employee,
2. With less than one year elapsed since terminating his employment with the City and HSH,
3. Who would be representing his new employer, HAF, and

4. Be communicating with the intent to influence his former Department, HSH.

Mr. Block would thus need a waiver from the Ethics Commission to engage in the activities described in his waiver request, to avoid potentially violating the one-year post-employment communication ban.

Relevant Factors Regarding the Potential for Undue Influence or Unfair Advantage

As the Commission evaluates whether granting a waiver to Mr. Block would create the potential for undue influence or unfair advantage, [Regulation 3.234-4](#) identifies several factors the Commission may consider as part of its determination. These factors include: the nature and scope of the communications the individual will have, the subject matter of such communications, the former position held by the officer or employee, the type of inside knowledge that the individual may possess, and any other factors the Commission deems relevant. These factors are discussed below.

The nature, scope, and subject matter of the potential communications.

A primary purpose of the one-year communication prohibition is to prevent former City officials from leveraging their prior positions to get their foot in the door with the City or otherwise provide an unfair advantage to their new employers. In this instance, the request for potential communications involving Mr. Block originates from the City, and not Mr. Block's current employer. The fact that the City is proactively seeking this engagement from HAF suggests that Mr. Block is not leveraging his past role to facilitate HAF's access to the City.

Furthermore, this request originated from MOHCD, which is not Mr. Block's former department. The one-year communication prohibition is only implicated because Mr. Block's former department, HSH, will also be participating in the meetings, although they are not leading the meetings. This also suggests Mr. Block's connections to his former department are not being leveraged for undue influence or unfair advantage. Similarly, the request to participate in these meetings was also made to Mr. Block's current employer, HAF, and not to Mr. Block himself. This creates an additional layer of separation between Mr. Block and the request for these communications.

Because of the somewhat broad project work and the fact that the City proactively initiated the request for input, it is unlikely Mr. Block's knowledge, experience, and relationships from his previous role would provide HAF with actual or perceived undue influence and an unfair advantage.

Additionally, the nature and scope of Mr. Block's former City position and current role with HAF share minimal similarities. In his previous role, Mr. Block worked on housing placement for people experiencing homelessness, reducing vacancies in permanent supportive housing, and various referrals, transfers, and requests for reasonable accommodations. In his current role, Mr. Block provides expertise regarding housing placement and supportive housing for HAF's projects as part of the organization's mission to accelerate production and preservation of affordable housing and expanding community facilities.

While a part of Mr. Block's current role with HAF may involve periodic interaction with HSH as they seek to improve the City's permanent supportive housing network and related processes, his previous role with HSH did not include participation in any comprehensive review of the City's permanent supportive housing portfolio and programs. This lack of similarities and overlap between

the two roles reduces the likelihood of confusion regarding Mr. Block's role in any potential communications.

Additionally, any communications and their subject matter Mr. Block could be part of do not appear to involve more than provision of expertise through input and recommendations across a handful of meetings each month, additional email communications, and draft documents over the six-month project timeline.

Inside knowledge Mr. Block may possess.

As outlined above, the potential communications for which Mr. Block is seeking a waiver originate from an invitation from the City. As part of this process, MOHCD is seeking input from other City departments and HAF, which is the sole non-governmental entity invited to provide expertise and recommendations on this project through an ongoing partnership. Given this, there is little evidence that Mr. Block is utilizing any inside knowledge of the City in a way that would be unfairly benefiting HAF, as HAF has been invited as an existing partner of MOHCD to participate in the permanent supportive housing review project. Based on the facts provided, it is likely that HAF would have been invited to participate in this review irrespective of Mr. Block's employment by their organization.

Other factors that may be relevant.

The project work described in the waiver request is part of the City's "Breaking the Cycle" initiative in cooperation with the Mayor's office, with MOHCD taking the lead. HAF's role in the project is to provide grant funding and support for the expansion of interim housing capacity and enhancement of community services and related systems in San Francisco. HAF does not have a contract with MOHCD and does not charge for its services related to work on this initiative.

However, HAF does have a contract with HSH to work on applications for Project Homekey (a state funding program for affordable housing) awards. Mr. Block was not involved with any work related to Project Homekey during his tenure at HSH, including the awarding of the original contract, and is similarly not involved in Project Homekey related work at HAF. Additionally, HAF also has a \$20 million loan from MOHCD that provides support for affordable housing developers in San Francisco to acquire land or buildings for future affordable housing projects for which Mr. Block was not involved in as a City employee or in his current role with HAF.

Recommendation

The Commission is asked to consider the potential for undue influence or unfair advantage if a waiver were to be granted. Based on the facts provided, Staff do not see strong reasons that Mr. Block's work with HAF and involvement in these communications would lead to either. The activity Mr. Block would like to engage in through his requested waiver is not primarily directed at his former department and is unlikely to give his current employer any advantage compared to other non-governmental entities working on permanent supportive housing. The project itself is a short duration (approximately 6 months) and will involve infrequent communications across the entire working group.

Staff recommends the Commission consider approving a limited waiver for Mr. Block. Such a waiver should be limited to only allow Mr. Block to participate in the review of the City's permanent supportive housing as described in the waiver request.

Staff would like to thank Mr. Block for his detailed waiver request, thoughtful communications throughout this process, and service to the City.

Attachments:

Attachment 1: Waiver Request from Chris Block Dated October 22, 2025

ATTACHMENT 1



Patrick Ford
Executive Director
San Francisco Ethics Commission
25 Van Ness Avenue, Suite 220
San Francisco, CA 94102

Dear Ethics Commission,

I write to seek a narrow, program-specific waiver of the one-year post-employment restriction on communications with my former department, established by San Francisco Campaign and Governmental Conduct Code Section 3.234(a)(2). I was previously an employee of the City's Department of Homelessness and Supportive Housing ("HSH"), and my last day of employment was May 2, 2025. At the time of my departure, I was the Manager of Housing Placement at HSH. I am currently a Senior Advisor at the San Francisco Housing Accelerator Fund ("HAF").

The narrow waiver I request would allow me to communicate with my former colleagues in HSH specifically regarding a review of the City's permanent supportive housing portfolio. This effort will be led by Mayor's Office of Community Development ("MOHCD"), but HSH employees will also be involved. The review kicked off in October 2025 and will require approximately six months to complete.

Work History

I have spent my career working on affordable housing, supportive housing, and housing placement.

During the majority of my career, I worked for the Charities Housing Development Corporation of Santa Clara County ("Charities Housing"), an affordable housing organization in Silicon Valley.

Later in my career, I also worked at Episcopal Community Services and the Tipping Point Foundation on similar issues, including reentry placement.

During the COVID-19 epidemic, I became a temporary City employee and was involved in the creation of a housing placement team for the Department of Emergency Management ("DEM"). During the epidemic, many persons experiencing homelessness were placed in hotels, and as the FEMA funding for the hotels began to wane, the City needed to find permanent housing for these individuals. The housing placement team led this effort.

At the end of the COVID-19 epidemic, I became a permanent City employee at HSH. At HSH, I managed the housing placement team to reduce vacancies in permanent supporting housing. The team also worked through referrals and cooperated with providers of general assistance housing. The team was also responsible for transfers, responding to requests for reasonable accommodations.

I joined HAF on May 5, 2025. HAF is a small nonprofit organization – currently comprised of 14 employees – that aims to preserve and expand quality affordable housing and community facilities. HAF seeks to “accelerate” the production and preservation of affordable housing for economically disadvantaged households by lending to, investing in, and directly acquiring real estate assets. At HAF, my role is to bring my expertise regarding housing placement and supportive housing to the organization’s projects.

Review of City’s Permanent Supportive Housing Portfolio

As mentioned above, the City has recently initiated a review of its permanent supportive housing portfolio. This project will be led by MOHCD, involves several City departments including HSH, and will also involve the HAF. At the end of the review, the City will develop a draft optimization plan for its permanent supportive housing portfolio.

MOHCD has invited HAF to engage in this review, largely to provide the perspective of providers of permanent supportive housing as the City determines its long-term strategy. HAF has a small number of employees with this experience, including myself. As a partner in this effort, HAF would share what it has learned from providers and offer recommendations. It is possible that this cooperative project would, in a technical sense, implicate the City’s one-year post-employment communications restriction. By providing input and recommendations on the City’s permanent supportive housing portfolio, including with HSH employees, I would arguably be communicating with the intent to “influence a government decision” – that is, how to make improvements in permanent supportive housing. However, as described further below, the circumscribed work for which I seek a waiver does not confer an ability for me to actually influence decision-making.

This review is estimated to take approximately six months. While this review is just beginning, there likely be a couple of meetings a month, with approximately a dozen meetings in total. In addition to meetings, the group will share ideas via email and various draft documents.

Since this will be a short-lived project, if I do not receive a waiver, I will likely be unable to participate in the proposed work altogether. My one-year communications ban would end in May 2026, when the review would likely be complete.

No Undue Influence or Unfair Advantage

Under Section 3.234(c)(1), the Ethics Commission can grant a waiver from the one-year post-employment ban, if the waiver would not create the potential for undue influence or unfair advantage.

As described above, the City – principally MOHCD – has invited HAF to engage in the process of reviewing the City’s permanent supportive housing stock. HAF is not seeking to influence the City’s decision-making process for any contracting advantage or financial gain. Likewise, I would not receive any potential monetary benefit.

To the contrary, the HAF and I would be involved for the sole purpose of providing our decades of expertise on supportive housing and improving the City’s processes regarding the same.

Since the permanent supportive housing review has already begun, I hope that the Ethics Commission can consider this waiver at its next meeting. I will plan to attend your next meeting to answer any questions and am available for questions from staff as well.

Thank you for your consideration.

Sincerely,


Chris Block