



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: February 9, 2026
To: Members of the Ethics Commission
From: Patrick Ford, Executive Director
Subject: **Agenda Item 4 – Executive Director’s Report**

Summary and Action Requested

This report provides various programmatic and operational highlights since the last report.

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

Staffing Update

I am pleased to announce that Laura Mandler began work on a permanent basis as Engagement and Compliance Manager on January 20, 2026. Laura served as the Compliance Counsel in Engagement and Compliance since November 2024 and had been the Acting Engagement and Compliance Manager since October 2025. She previously worked in the Enforcement Division of the Fair Political Practices Commission (FPPC), as well as the FPPC's Statement of Economic Interest (SEI) unit, and as a law clerk at the Oakland Public Ethics Commission.

With Laura’s departure from her previous position, the Division now has one vacant 1823 position which the Commission is seeking approval from the Mayor’s Budget Office to backfill.

Policy Projects Update

The following updates cover multiple ongoing policy projects and discuss a set of potential changes to the City’s campaign finance laws.

- **Streamlining Project:** Staff are continuing to meet with advocates and members of the Board of Supervisors to discuss the legislation originating from the Commission’s project to streamline and update various programs and policies. This includes an ordinance amending the City’s campaign finance rules that would strengthen and simplify how expenditure ceilings function with the Public Financing Program and adjust the campaign contribution limit for inflation ([File #250868](#)). The second ordinance would discontinue outdated and unnecessary reporting requirements regarding campaign consultants, recusals, and major developers ([File #250867](#)). The third and final ordinance ([File #250928](#)) would discontinue the program through which candidates for certain City trustee boards are required to register and file financial reports with the Commission, a program that has seen almost zero reported activity during its existence. Through these meetings, Staff are exploring potential amendments and working to see if these ordinances have a path forward in 2026. Thus far, none of the ordinances have received a hearing at the Board of Supervisors.

- **Behested Payment Waiver Legislation:** Since October, the Commission has discussed legislation introduced by President Mandelman that would make changes to the waiver provision of the City's behested payment rules ([File #250947](#)). In January, the Commission voted to approve this legislation, pending the inclusion of a sunset provision. An amended version with the sunset provision added would still need to be approved by the Commission for this legislation to move forward. President Mandelman has requested the Commission delay additional consideration of this item, but it may return to the Commission at a future meeting.
- **Potential Changes to Campaign Finance Laws:** Staff are reviewing potential changes to the City's campaign finance rules. These changes largely stem from conduct in the 2024 election that made it clear that current laws are likely inadequate to address how non-candidate committees interact with candidate committees. Specifically, staff are reviewing issues that arise from candidates controlling multiple committees and when third party spending in an election should be considered a contribution to the candidates who are benefiting from that spending. To gather perspectives, help guide further research, and identify possible improvements to the law, Staff will be holding Interested Persons meetings the first week of March. Members of the public who wish to attend these Interested Persons meetings can [RSVP on the Commission's website](#). Additional updates and a report with recommendations will be presented to the Commission during future meetings.

Commission Streamlining Task Force

Following the most recent update from the [November 14, 2025 Executive Director's Report](#), Ethics Commission staff maintained contact with Task Force members and staff to support their research and discussions. In addition to comments received directly from the Commission, several advocacy and good government organizations (California Common Cause, League of Women Voters of San Francisco, and California Clean Money Campaign) also submitted comments urging the Task Force to maintain the Commission's current ability to place measures on the ballot.

The Task Force finalized and submitted its [final report with recommendations for the Mayor and Board of Supervisors](#) on January 28th. Its recommendations for the Ethics Commission include:

- Maintain the existence of the Ethics Commission
- Retain its current appointment structure
- Keep for-cause removal in place for members, but remove the ability for voters to remove members via a recall election
- Proposed changes to the Ethics Commission's ballot measure authority, including Board veto power

The proposed changes to the Commission's ballot measure authority would subject Commission ballot measures to Board of Supervisors amendments and veto. The Task Force's proposal would add a number of notice and hearing requirements for Commission measures. It would then allow the Board to amend such measures with a vote of 6 supervisors. The Commission could override such amendments

with a vote of 4 commissioners. This element of the Task Force's proposal was approved unanimously by the Task Force.

However, the Task Force also proposed that the Board of Supervisors be empowered to veto an Ethics Commission ballot measure entirely by vote of 8 supervisors. Upon such a veto, the measure in question would be quashed, and the Commission would apparently be unable to take further action on it. The element of the Task Force's proposal to allow the Board of Supervisors to veto Ethics Commission measures was added through a separate motion that only passed on a 3-2 vote. This underscores that the Task Force was closely split on the question of whether the Commission should retain ultimate authority of the contents of any measure that it places before voters. Two of the five members of the Task Force viewed this as a part of the Commission's independence and voted to retain it.

The City Attorney will be drafting legislation reflecting these recommendations, and a draft is expected by March 1. Implementing the Task Force's recommendations will require a Charter amendment and one or more corresponding ordinances. A Charter amendment, which would include any changes to the Ethics Commission, require approval by the Board of Supervisors before being submitted to voters for final approval or disapproval. Ordinances do not require ballot placement and will go through the standard legislative process of the Board of Supervisors.

The Board of Supervisors will hold a hearing on the drafted legislation by April 1, and the proposed ordinance(s) will be enacted 90 days after it is introduced unless 8 of the 11 members of the Board of Supervisors vote to disapprove before then. Should the Board of Supervisors decide to put a Charter amendment on the November ballot, they must do so by July 24— although another path to the ballot could include a citizen-run initiative petition. Otherwise, the Task Force will complete its work and dissolve by January 31, 2027.

Charter Reform Working Group

In parallel, Mayor Daniel Lurie and Board of Supervisors President Rafael Mandelman have formed a Charter Reform Working Group whose aim is to produce recommendations on streamlining governance through changes to the City's charter. They are slated to have a series of four meetings, three of which occurred on December 10, 2025, January 30, 2026 and February 5, 2026. The fourth and final meeting will be on March 4, 2026.

Although the Commission has been briefly mentioned in potential recommendations, the Working Group has otherwise not had detailed discussions on the Ethics Commission. At its January 30 meeting, the Controller presented [slides](#) that discussed, among other topics, "reducing legislative and/or mayoral access to the ballot." This included the option to "modify the Ethics Commission's ability to place a measure on the ballot" by "requir(ing) a Board hearing and action on proposed Ethics measures." This referred to the recommendation of the Prop E Streamlining Task Force discussed above. The members of the Task Force did not discuss the Ethics Commission's ballot measure authority during their discussion.

I was permitted to give one minute of public comment at the Working Group meeting, and during this time I highlighted the fact that only 4 of the 403 ballot measures (less than 1%) sent to voters since 1996

came from the Ethics Commission, that the scope of any ballot measure is strictly limited to the sections of the law under the Commission’s purview, and that ballot measure authority is an important element of the Commission’s independence and effectiveness.

Commission staff will be monitoring the progress of the Working Group and will provide another update in the coming weeks.

Budget

The FY27–FY28 budget process is now underway. The Mayor’s Budget Office issued its initial budget instructions on December 12. City law requires that each department hold two public meetings to discuss the department’s budget prior to submission of the department’s budget proposal. The second of those two discussions will take place as part of Agenda Item 13. The materials attached to Agenda Item 13 provide more information about the Ethics Commission’s budget.

Key Performance Indicators

As discussed in previous reports, one of the Commission’s top goals in FY26 has been the expansion and standardization of key performance indicators (KPIs) and how they are tracked and reported. KPIs monitor progress on core programs, and they allow commissioners, managers, and staff to understand the volume, timing, and nature of the Commission’s work. This information is crucial to planning and operational effectiveness.

In January, managers finalized the KPIs for the first half of FY26. Those datapoints are presented below. Overall, the Commission achieved or exceeded the majority of its KPI targets in Q1 and Q2 of FY26. This reflects strong and consistent staffing levels, the completion of projects to coordinate and align workflows, trainings and onboarding efforts, and many hours of hard work by staff.

The following data reflects mid-year targets and performance:

- 1) **Enforcement:** Commission staff process complaints and investigate and resolve violations of ethics, campaign finance, lobbying, and whistleblower protection laws

Metric	Mid-Year Target	Mid-Year Actual	Status
Rolling average age (in months) of complete preliminary reviews	2	1.39	Met
Number of investigations opened	45	78	Exceeded
Proactive cases opened	6	3	Needs attention
Percentage of cases resolved within one year	95%	96%	Met

Probable Cause Reports Served	3	2	Needs attention
----------------------------------	---	---	-----------------

Enforcement KPI Review:

The Commission is meeting or exceeding most of its enforcement goals. The average for probable cause reports served should be revisited at the end of the fiscal year, as this is a small number that can fluctuate depending on the life-cycle of the case docket. Staff will review opportunities to identify and pursue proactive investigations.

- 2) **Audits:** Commission staff administer the City's Public Financing Program and conduct campaign committee audits.

Metric	Mid-Year Target	Mid-Year Actual	Status
Total transactions reviewed per auditor for completed audits (avg)	300	522	Exceeded
Total transactions reviewed per completed audit (avg)	195	201	Met
Submitted contributions reviewed for public financing program	4,380	467	This metric is subject to committee submissions. All submissions were reviewed on time.
Average time to review matching fund request and issue decision (business days)	4	N/A	No Data – No Matching Requests were received in Q1 or Q2.
Priority audits completed	0	0	Met – This work only began in Q3.
Public Financing audits completed	18	14	All public financing audits are slated for completion in February.

Audits KPI Review: Commission staff are on track to complete all audits of the 27 committees to receive public financing during the 2024 election by the end of February. Staff have also identified and initiated six priority audits. Finally, staff have begun disbursing funds as part of the public financing program.

Because 2025 was not an election year, numbers around the public financing program cannot be interpreted until the end of the fiscal year. The midyear target is half of the full-year target, but this program will see a disproportionate amount of its activity in the second half of the fiscal year. Staff will receive a significant increase in submitted contributions as two 2026 elections approach.

- 3) **Engagement & Compliance:** The Commission engages directly with City officials and employees, campaigns, lobbyists and other regulated community members to provide compliance materials, advice, and trainings.

Metric	Mid-Year Target	Mid-Year Actual	Status
Number of support tickets closed	870	679	Seasonally dependent
Average staff time to resolution for Disclosure Program support tickets (business days)	1	0.29	Met
Average staff time to resolution for Non-Disclosure/Legal Question support tickets (business days)	4	3.07	Met
Average end-to-end completion time for Disclosure Program support tickets (calendar days)	5	3.60	Met
Average end-to-end completion time for Non-Disclosure/Legal Question support tickets (calendar days)	7	8.74	Needs attention

Engagement and Compliance KPI Review:

The Commission is successfully meeting most of its engagement and compliance goals, including providing efficient and accurate advice and guidance to those who reach out for assistance. While number of support tickets closed is slightly below the target, this is predominantly a function of how many support tickets staff have received – the first six months of the fiscal year included no ethics filing deadlines and very few campaigns. The midyear target is half of the full-year target, but this program will see a disproportionate amount of its activity in the second half of the fiscal year.

The disparity between average staff time to resolution on legal question support tickets and average end-to-end completion time for legal question support tickets provides valuable data for our staff. This suggests that for this category of ticket, staff often run into roadblocks while the tickets are not on their desk – when they are waiting for additional information from the requester, for example. Staff will focus on ways to reduce these roadblocks.

- 4) **Policy:** Commission staff conduct research and analysis of department programs and conduct regulatory and legislative projects; support Mayor and Board of Supervisors with policymaking and support Departmental implementation of state and local ethics laws; and administer waiver processes.

Metric	Mid-Year Target	Mid-Year Actual	Status
Media interactions	N/A	26	No Target
External meetings monitored	N/A	23	No Target
Advice Questions/Tickets Closed with Policy Consult	N/A	41	No Target
*Commission Interactions Published	N/A	8	No Target
Policy Reports Issued (findings and recommendations)	N/A	2	No Target
IP Meetings Held	N/A	0	No Target

Policy KPI Review:

Since metrics are currently more informational (no target set), KPI's need to define clear targets for high-impact activities (i.e. policy reports issued, IP meetings) to measure progress. Staff will continue tracking trends over time and establish goals prior to the next fiscal year.

*This item tracks the sum of staff interactions with the Commission, including policy reports, waiver requests, regulation changes, legislative approvals, informational memos, and updates through the Executive Director's Report.

- 5) **Electronic Disclosure & Data Analysis:** Staff administer the Commission's mandated disclosure programs, including by administering filing platforms, supporting filers, processing filings, and providing the public with information on all filings through databases and dashboards.

Metric	Mid-Year Target	Mid-Year Actual	Status
Total support tickets resolved	252	278	Exceeded
Total filings successfully processed	6,000	3,651	Seasonally dependent
Technology procurements completed	13	7	Needs attention

EDDA KPI Review: Commission staff have processed fewer filings than the target number primarily because the first half of the fiscal year does not include any major filing deadlines. The midyear target is half of the full-year target, but this program will see a disproportionate amount of its activity in the second half of the fiscal year.

- 6) **Operations:** Staff support all departmental operations, including HR, recruitment, budgeting, administration of financial accounts, compliance with all City policies and procedures, public records, public meetings.

Metric	Mid-Year Target	Mid-Year Actual	Status
Percentage Budget variance (quarterly)	5%	0.80%	Met
Percentage of vacancies filled within 3 months	100%	100%	Met

Percentage of bills paid on-time	100%	75%	Needs attention
Conversions to Civil Service	6	7	Exceeded
Outstanding Purchase Orders (at the end of each month)	15 or fewer	14	Met

Operations KPI Review:

The Commission is successfully meeting most of its operations goals. Staff have identified the use of an automated notification for approaching invoice due dates to assist with increasing that metric.

We began collecting KPI data at the start of the fiscal year (July) to provide a clear picture of how our department operates and performs throughout the year. These metrics offer a snapshot of each division's performance, how it aligns with our mission, and the value it brings to the City. Our goal is to operate efficiently and transparently, while proactively addressing potential challenges—especially in today's economic and budgetary climate.

These KPIs represent our initial framework and will continue to evolve as we identify opportunities for improvement and refine our approach. This effort supports the Mayor's vision of effective, common-sense government and ensures accountability in delivering services to the public.