



San Francisco Ethics Commission

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Date: February 9, 2026

To: Members of the Ethics Commission

From: Laura Mandler, 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 of the Commission's Engagement and Compliance Division. The report includes staffing updates, metrics for the Commission's online support portals, and an update on the disclosure programs and current projects.

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

Staffing Updates

Laura Mandler was recruited into the position of Engagement and Compliance Manager on January 20, 2026. Laura served as the Compliance Counsel in Engagement and Compliance since November 2024 and has 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 to backfill. While this position remains vacant, the Division has only one analyst position filled. This backfill would allow for more robust administration of the Commission's five mandated disclosure programs, ensure timely advice to the regulated community, and allow for the completion of projects to provide more guidance materials and training. Without this position, the Commission would have to significantly scale back the level of compliance support that it has historically provided to City officials, campaigns, lobbyists, and other regulated persons.

2025 Calendar Year Support Portal Data

Engagement and Compliance utilizes online support portals to manage the various support requests fielded by the Division. These requests primarily include guiding filers through the use of the Commission's online disclosure systems, providing fact-based compliance advice to City officers and employees, and assisting the public in accessing and understanding disclosure filings. Below are metrics and charts that summarize the volume and variety of requests managed by Engagement and Compliance

in the 2025 calendar year.¹ Departmentwide KPI information is also provided as part of the Executive Director’s Report (Item 4).

In total, 2,209 tickets were resolved through these support portals throughout the 2025 calendar year. The chart below summarizes the number of tickets by program area:

Chart 1: Support Portal Tickets in 2025 (by program area)

Program	Count of Support Tickets by Program
Campaign Finance and Campaign Consultant	271
Ethics Advice	318
Lobbyist	100
Major Developers and Permit Consultants	16
Form 700 and Departmental Gifts	1,504
Grand Total	2,209

The Form 700 (Statement of Economic Interests) program continues to represent the greatest number of support requests, with 1,504 requests resolved. Additionally, Engagement and Compliance staff handled more than 318 support requests related to the Ethics Advice program.

Chart 2: Average Staff Time to Resolve Request in 2025 (by program area)

Program	Staff Time to Resolve Request (in business days)
Campaign Finance and Campaign Consultant	Approx. ½
Ethics Advice	3.3
Lobbyist	Approx. ½
Major Developers and Permit Consultants	< ½
Form 700 and Departmental Gifts	< ½

These resolution times reflect the amount of time a request is in the “Waiting for Support” and “In Progress” statuses in the advice tracking system. “Waiting for Support” is the status of questions that

¹ This work is carried out in conjunction with the Technical Assistance Unit (TAU). The two-person TAU unit was moved under the EDDA Division at the end of Q2 of FY26 to better integrate filer support functions with the Commission’s larger systems support and maintenance work.

have been submitted but on which a staff member has not yet begun work. “In Progress” is the status for matters on which a staff member is currently working. When a staff member requests additional information from the person seeking assistance in order to provide a complete and accurate answer, the system will indicate a different status until the requestor responds, and that time is not included in the Staff Time to Resolve Request statistics above. These statistics are designed to measure the amount of time it takes staff to actively work support requests in order to measure efficiency.

The average staff time to resolve requests in all programs other than Ethics Advice was half a business day or less. Ethics Advice requests, which generally require additional staff time to research the facts of the question asked, had an average time to resolution of 3.3 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. However, Ethics Advice is the program most heavily impacted by the currently vacant 1823 position. While this position was filled during most of CY 2025, it is currently vacant and awaiting approval from the Mayor’s Office to backfill, as described above. If this position is not filled, this will likely have a severe effect on response times and the Staff Time to Resolve Request statistic will continue to be approximately 3 business days or more.

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 improves the clarity and cohesion of the content while also enhancing the audio and visual user experience, similar to the Annual Ethics Training discussed below. This new training is undergoing final revisions and will launch in the next quarter.

Campaign Finance

As two sets of City elections approach in 2026, Division staff are currently making improvements to administration processes for campaign finance disclosure filings. The Division is updating the documented protocols for all disclosure programs and making improvements to the protocols where an update needs documentation or more specificity is required. This documentation should allow for uniformity of administration of each program through each cycle of the programs.

Similarly, the Division is also updating the procedures for compliance reviews and referring noncompliant campaign finance statements to Enforcement. While the Division currently does the state-mandated filing officer reviews of all campaign statements that are filed, we are working with other divisions to ensure that the Commission’s compliance reviews of campaign finance statements are coordinated between divisions to maximize efficiency. Along with coordination of reviews, the Division is working to reconfigure the process of unaddressed amendment requests sent to committees as well as coordinating with the Enforcement Division processes for referring non-filers or non-responsive committees for enforcement action.

Statement of Economic Interest (Form 700)

Division staff have worked closely with the Technical Assistance Unit (TAU) in the EDDA Division to prepare for the Annual Statement of Economic Interest (Form 700) filing deadline on April 1, 2026. Trainings for filing officers took place last week and trainings and TAU office hours for filers will be offered later this month. Reminders to filers regarding the Annual Form 700 deadline will be sent approximately every other week until the filing deadline.

As previously reported, for the past year 23 City officers have been required to file their Form 700 with the Fair Political Practices Commission (FPPC) under the FPPC's interpretation of AB 1170. However, with the passage of SB 852 in the past year, an additional 27 filers are now required to file directly with the FPPC as well. This has resulted in the 50 filers in question being required to file the Form 700 twice: once in the City's system so that the information can be used by City departments, the Commission, press, and the public; and once in the FPPC's system as required by the new laws. Division staff have also personally reached out to all 87200 filers who are required to file directly with FPPC to notify them of this requirement.

FY26 Projects

Annual Ethics Training

The new Annual Ethics Training was launched on December 19, 2025. All officials now have access to the new training to complete their required ethics training by the April 1, 2026 deadline. As reported in the previous quarterly updates, the training was modified from previous years based on feedback from users on the functionality, format, and content of the training. The total training time has been significantly reduced, from over two hours to approximately one hour. The training also emphasizes plain language definitions of rules and provides real-world application of the rules to scenarios officials face. The subject matter of the examples and scenarios were informed by questions submitted by officials through the Ethics Advice Portal. The initial feedback received from users since the launch has reflected positive user experiences and has directly noted the new segmented version of the training allowed for easier completion in phrases.

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. Engagement and Compliance has completed the conversion of the Filing Officer Manual. The conversion of the Candidate Manual is slated for completion in February to align with the needs of candidates participating in the 2026 elections. The conversion of the Lobbyist manual is slated for completion by the end of the fiscal year. Staff had planned to make substantive improvements within each manual and harmonize the manuals with existing webpages to ensure material is covered thoroughly without duplicative content. However, given the more limited staffing of the division than previously anticipated, we project that any major substantive improvements will need to be accomplished at a later time.

Campaign Finance Training Program

Staff have been preparing for the upcoming 2026 elections, including both a June special election (Districts 2 and 4) and a general election in November (Districts 2, 4, 6, 8, and 10). Both elections will feature candidate contests and ballot measure contests. Staff are working to provide trainings for candidates, primarily formed committees, and general purpose committees that best meet the needs of these committees and which can be implemented for all following elections. A key goal of this training program will be to offer trainings in a format that is both efficient for the Division while it is not at full staff capacity, but also convenient for candidates and treasurers in election season.

Required trainings for candidates and their controlled committees for the 2026 elections have already started and will continue through the next quarter, along with primarily formed and general purpose committee trainings. The candidate and candidate committee trainings also contain a segment which covers the requirements of the public financing program. The schedule of trainings is provided below. Candidates and treasurers can sign up for trainings and find other compliance resources by visiting the Commission's [website](#).

Candidate Committee Trainings	Time Offered
Thursday, February 5, 2026	11:00 AM – 12:30 PM
Monday, March 2, 2026	3:30 PM – 5:00 PM
Friday, May 1, 2026	11:00 AM – 12:30 PM
Thursday July 9, 2026	3:30 PM – 5:00 PM

Primarily Formed and General Purpose Committee Trainings	Time Offered
Thursday January 27, 2026	3:00 PM – 4:30 PM
Thursday February 19, 2026	11:00 AM – 12:30 PM
Friday, April 10, 2026	11:00 AM – 12:30 PM
Thursday July 23, 2026	3:00 PM – 4:30 PM