



ETHICS COMMISSION

CITY AND COUNTY OF SAN FRANCISCO

PAUL A. RENNE
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LEEANN PELHAM
EXECUTIVE DIRECTOR

Date: April 21, 2016

To: Members of the Ethics Commission

From: LeeAnn Pelham, Executive Director

Subject: **AGENDA ITEM 5 – Status report on the Ethics Commission’s Proposed Budget For Fiscal Years 2017 and 2018**

Summary This report provides a status update on the Ethics Commission’s proposed FY2017 and 2018 budget.

Action Requested This item is presented for the Commission’s information and discussion. No action is required.

Background

The Ethics Commission submitted to the Mayor’s Office its proposed FY 2017 and 2018 budget request, *Blueprint for Accountability*, on February 22, 2016.¹ Staff from the Commission met with the Mayor’s Chief of Staff and representatives from the Mayor’s Budget Office on March 11th, and will meet again with Budget Office staff on April 22. As the City’s budget development process continues to be underway, this report provides a status update on key developments to date with regard to the Commission’s budget request.

Item: Mayor’s Senior Fellow Submissions

During the annual budget cycle, the Mayor’s Budget Office offers the opportunity each fiscal year for departments to compete for a limited number of Senior Fellow positions. Senior Fellows are experienced individuals from outside of the government sector who are seeking to use their skills and expertise to make a difference in the public sector. Over the course of a year, Fellows tackle senior level opportunities identified by their sponsoring department and bring fresh insights to develop or accelerate projects with broad impact that would be challenging or impossible for departments to deliver, or delivery timely, absent those resources.

On February 22, the Commission submitted the maximum of three Senior Fellow proposals:

Strengthening Accountability with Online Technology. Creating practical tools and innovative user guides for consumption in a web- and social-media based environment that leverage demand for a more user-focused online experience. By enhancing the user-experience, the goal is to improve compliance, support accountability, and facilitate broad public understanding across a comprehensive range of governmental ethics

¹ A copy of the Commission’s budget transmittal appears for ease of reference at Attachment 1.

requirements.

Leading Policy Practices. Accelerating the Commission's development and use of leading policy evaluation and engagement practices, including improved use of data in policy analysis and formulation, to ensure and sustain a framework of local political reform laws that is strong, workable, and effective.

Audit Effectiveness/"T3" Innovations. Developing and implementing a strategic audit plan to improve governmental accountability that includes new audit tools, standardized templates, and clear timelines for achieving more efficient, effective, and transparent campaign and lobbying audits.

For reference, the Commission's submissions to the Mayor's Senior Fellows program appear at Attachment 2.

Status: We understand that selections of departmental Senior Fellows were anticipated this spring, with fellowships to begin their year-long projects in September. We are unaware at this time of any decisions that have been made regarding placement of the coming year's Fellows.

Item: E-Filing Conversion Project

As detailed in our *Blueprint for Accountability*, the Commission is seeking funding to improve organizational efficiencies and strengthen public tools for meaningful transparency about government actions by establishing an integrated, searchable and downloadable framework for all Commission public disclosure programs.

Currently, the Form 700 e-filing system is used by elected officials, department heads, and commissioners that file Form 700 with the Ethics Commission. In FY 17-18, the Commission would make the Form 700 e-filing system available to designated filers that are required to file Form 700 with their respective City department. The system would allow departments to manage their own filers, but provide the Commission with a tool to monitor compliance City-wide. It would also provide the public with a central location to view the forms on the Commission's web site.

In FY 16-17, staff proposes adding three new forms to the Form 700 e-filing system: Sunshine Ordinance Declaration, Certificate of Ethics Training, and Gifts of Travel Report. This would allow City Officers to complete all their individual filing requirements in one electronic system.

In addition, we have proposed enhancing the campaign finance data services, to build an API to better connect the Commission's campaign finance data to the City's open data system. The API would provide more timely access to the data and marry the campaign finance reports with metadata about each election to provide context to the disclosures. Staff also intends to pursue better geocoding of the contribution data to permit research of financial activity within specific district boundaries. Staff intends to make the API available prior to the November 2018 election.

Status: On April 1, 2016, Commission staff presented the E-Filing Conversion Project to the Budget and Performance Sub-Committee of the Committee on Information Technology (COIT). COIT allocates funds for the startup costs of new City IT projects. The slide deck for our presentation to the Sub-committee appears at Attachment 3.

On April 14, 2016, the Sub-committee voted to recommend to the full COIT that the startup professional services and materials and supplies costs for our E-Filing Conversion Project be funded in full. The Sub-committee, however, did not recommend funding the one FTE we identified as critical to staffing the project. The full COIT will consider the recommendation in May.

We are continuing to pursue the one FTE for the project through the Mayor's budget process. As we previously identified in our *Blueprint for Accountability*, one Information Systems Business Analyst position is necessary to this project. Without this additional FTE, the Commission will not have the staffing resources to commence with the project.

Item: Policy and Investigative Staffing

In addition to the Information Systems Business Analyst position noted above, the Commission's proposed FY17 and 18 budget also identified the critical need to strengthen our organizational capacity in two other key areas: policy and enforcement.

POLICY. To deepen policy engagement and heighten compliance outreach to improve the effectiveness of laws within the Commission's jurisdiction, the Commission's budget proposes to create a dedicated Policy function which does not currently exist at the agency. A Senior Policy Analyst position and a Policy Analyst position would be specifically charged with providing broad based, timely, and understandable guidance on the laws. The focus of that work would be on understanding and conveying the practical application of the law, and provide compliance guidance to those whose activities are regulated by the city's ethics, lobbying, and campaign laws, among others.

Importantly, the two Policy positions would also be charged with conducting regular and rigorous policy analysis and evaluation. This is a function that does currently exist at the Commission. To assist the Commission, public, and City policymakers in ensuring that both existing and proposed laws are strong, workable and enforceable in practice, these positions are needed if City government reform laws are to be effective and most constructively address policy issues as they emerge.

ENFORCEMENT. To strengthen the Commission's capacity to fulfill its voter mandate for appropriate administrative enforcement of ethics, campaign finance, disclosure, and lobbying laws, including the effective resolution of Whistleblower and Sunshine complaints, the budget proposal also identifies the pressing need for additional investigative and enforcement resources. Absent additional resources, the Commission's will continue to lack the full capacity to handle its complaint and investigative workload with due timeliness. As a result, the existing backlog of items under preliminary review and complaints under active investigation will continue and likely deepen with the 2016 elections.

Status:

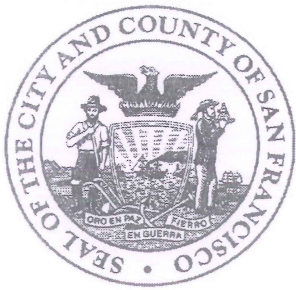
As discussions with the Mayor's budget team continue, we have provided additional information to that office in support of our request for these positions. As noted in our *Blueprint for Accountability*, performance indicators for any budget request are valuable to ensure that the Ethics Commission can track progress toward its established goals. They are also important to enable transparency to elected policymakers and the public so that they, too, can exercise appropriate oversight of the Commission's progress toward those goals.

Following on a commitment in our budget submission to ensure appropriate accountability measures could be in place with the beginning of the fiscal year, on April 8 we provided a detailed set of key performance indicators (KPIs) to the Mayor's Budget Office. These indicators of progress are ones we

would anticipate using to provide accountability for each of the requested positions: Information Systems Business Analyst (Job Class 1052); Senior Policy Analyst (1823); Policy Analyst (1822); and Investigative Analyst (1822). A table detailing the identified KPIs for each position appears at Attachment 4.

I welcome the opportunity to answer questions you might have about this update or the ongoing budget process at the Commission's meeting next week.

Attachments



ETHICS COMMISSION CITY AND COUNTY OF SAN FRANCISCO

Attachment 1

PAUL A. RENNE
CHAIRPERSON

BRETT ANDREWS
VICE-CHAIRPERSON

BEVERLY HAYON
COMMISSIONER

BENEDICT Y. HUR
COMMISSIONER

PETER KEANE
COMMISSIONER

LEEANN PELHAM
EXECUTIVE DIRECTOR

By Hand Delivery

February 22, 2016

The Honorable Edwin M. Lee
Mayor
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: Ethics Commission Budget Recommendations for FY17 and FY18

Dear Mayor Lee:

It is my privilege as the Ethics Commission's recently appointed Executive Director to provide you with the attached *Blueprint for Accountability*, a summary of the Ethics Commission's budget proposal for Fiscal Years 2017 and 2018. As one of the 38 General Fund Departments selected by the Mayor's Budget Office to initiate a two-year budget cycle, the Ethics Commission appreciates the opportunity to reflect on and convey in this document the strategic priorities that will guide our work over the next two fiscal years.

Embraced by a unanimous vote of the Ethics Commission at its January 25, 2016 regular meeting, this *Blueprint for Accountability* details the investments we believe are needed to begin to equip the Ethics Commission with the resources required to fully achieve the broad voter mandate it has been given the responsibility to achieve. This proposed budget is designed to move the Ethics Commission's own work to the next level of effectiveness, accomplishment, and public trust. It also reflects a renewal of our agency-wide commitment to working creatively, collaboratively, and energetically in support of transparent and accountable government City-wide.

We appreciate your review and consideration of our budget request, and we look forward to working with you and your staff as the Commission's FY17 and FY18 budgets are developed.

Sincerely,

A handwritten signature in blue ink, which appears to read "LeeAnn Pelham", is written over a horizontal line.

LeeAnn Pelham
Executive Director

Attachments

cc: Kate Howard, Budget Director, Office of the Mayor
Anthony Ababon, Budget Analyst, Office of the Mayor



Blueprint for Accountability

FY17 and FY18 Budget Recommendations
for the San Francisco Ethics Commission

February 22, 2016

I. Introduction

In its search for its next Executive Director in the Fall of 2015, the San Francisco Ethics Commission identified several overarching priorities for the agency going forward:

- ✓ Organizational efficiencies: employing new structure, tools, and approaches that can better serve achievement of the Ethics Commission's mission;
- ✓ Effective enforcement: strengthening current structure and processes to ensure accountability for compliance with appropriate transparency and the most proactive, thorough, fair, timely, and consistent investigations and case resolution;
- ✓ Supporting compliance: providing enhanced guidance to a broad range of stakeholders to promote practical understanding of the laws and facilitate compliance; and
- ✓ Strengthened policy focus: initiating the development of sound policy and collaborating broadly to identify and address emerging issues through effective legislation and regulation.

This budget blueprint reflects this vision of the Commission's future and drives the core recommendation that the Commission must be right-sized to better align resources with its full Charter mission.¹

It is also premised on staff work that is committed to continuous improvement.

Organizations that continuously improve use the challenge of emerging issues, expanded mandates, and new technology as important opportunities for change. Toward that end, Commission Staff are committed to improving the efficiency and effectiveness of existing resources through ongoing innovation, by working to simplify the complex, and by identifying new, more nimble processes, structures, and systems for the agency's work. As part of this effort, over the coming year the staff will work to

- assess existing structures and functions for needed improvements;
- examine what approaches in the organization are, or should be changing, and why; and
- identify operational interdependencies to better understand where more collaborative approaches, both internally and with external stakeholders, would benefit the delivery of Commission programs and services.

Ultimately, achieving the voters' directives requires political will, sufficient resources, and the right legal and structural frameworks to lead change and implement it effectively. This blueprint for accountability presents a strategic and aggressive set of budget recommendations necessary to enable the Ethics Commission to achieve its mission consistent with the voters' continuing strong mandate for both good and effective governance in the City and County of San Francisco.

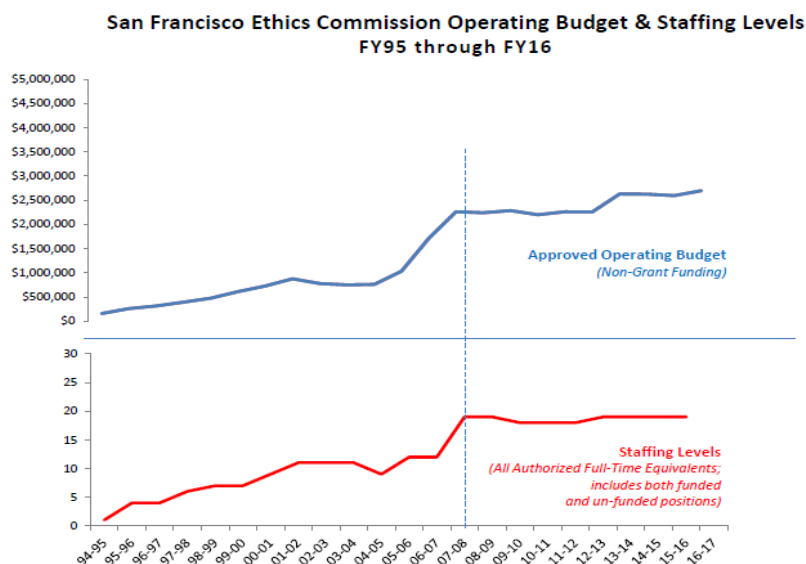
¹ See San Francisco Charter Sections C3.699-10 and C3.699-11 at Attachment 1.

II. Background and Context

In the past decade, issues confronting local government have become more complex and as public officials and employees pursue new and creative approaches to difficult public policy questions. Over this same period, the policy and political landscape for agencies that administer and enforce campaign finance, governmental ethics, lobbying regulation, and transparency laws have also continued to change.

In San Francisco, in just the past five years, three City and County Civil Grand Jury Reports² were issued that focus on the Ethics Commission's own role and responsibilities, with each report raising a series of important questions about how the Commission should most effectively pursue its voters' mandate for meaningful transparency and accountability in City and County government. Against this fluid and evolving backdrop, however, in the past decade the Ethics Commission's annual operating budget and staffing have remained relatively level, as Chart 1 below illustrates.

Chart 1



For FY17, the Ethics Commission recommends a total operating budget of \$3,394,954, and an FY18 operating budget of \$3,659,457. This includes new funding requests of \$656,046 for FY17 and \$841,492 for FY18. When compared to the Commission's FY16 operating budget of \$2,738,908, the proposed FY17 operating budget represents a roughly 24 percent increase over current levels. While robust, these recommendations are necessary to begin to equip the Commission with the resources needed to fully achieve the broad voter mandate it has been charged with the responsibility to achieve. As such, the recommendations are designed to move the Ethics Commission's own work to the next level of effectiveness, accomplishment, and public trust.

The priorities identified by the Commission to pursue these ends in FY17 and FY18 are detailed as new funding packages in the following section.

² See *San Francisco's Whistleblower Protection Ordinance Is In Need of Change*, City and County of San Francisco Civil Grand Jury 2014-15, May 2015; *Ethics in the City: Promise, Practice or Pretense*, City and County of San Francisco Civil Grand Jury 2013-14, June 2014; and *San Francisco Ethics Commission: The Sleeping Watch Dog*, City and County of San Francisco Civil Grand Jury 2010-11.

III. Priorities for New Funding

<i>Priority and Goals</i>	<i>Estimated Investment</i>
E-Filing Conversion Project	
<p>✓ Improve organizational efficiencies and strengthen public tools for meaningful transparency about government actions by establishing an integrated, searchable and downloadable framework for all Commission public disclosure programs.</p> <p><i>To develop a comprehensive network of fully online systems, additional staff is required to develop project scope and specifications; design system features; and conduct testing.</i></p>	
One IS Business Analyst position (1052) to provide systems support	\$ 111,296 FY17
for timely project development and implementation →	\$ 149,771 FY18
Phase I, project development and implementation →	\$ 300,000 FY18
One IS Business Analyst-Assistant (1051)	
to serve as an E-Filing Project Assistant beginning in FY18;	
converted from an existing Jr. Management Assistant position (1840)	
first authorized for a three-year project basis only →	\$ 131,316 FY18
<i>E-Filing Conversion Project Package Total</i>	<u>\$ 111,296</u> in FY17
	<u>\$ 581,087</u> in FY18
Effective Investigations & Enforcement	
<p>✓ Strengthen agency's capacity to fulfill its voter mandate for effective enforcement of ethics, campaign finance, disclosure, and lobbying laws, including resolution of Whistleblower and Sunshine complaints, by ensuring investigative and enforcement processes are thorough, timely, fair, and consistent.</p>	
Commitment of the balance of funds needed to fully fund	
one authorized, vacant Investigator (1823) position	
through retention of departmental "attrition savings"	No new funding
(In FY14-15, for example, these savings totaled approximately \$124,400)	requested
One Administrative Analyst (1822) position to serve as an Investigator →	\$ 101,323 FY17
	\$ 136,365 FY18
Additional funds necessary to update enforcement tools and technology	
for improved functionality of legal and investigative research, teand to	\$ 15,000 FY17
ensure appropriate access to process server and court reporter resources →	\$ 5,000 FY18
<i>Strengthened Enforcement Capacity Package Total</i>	<u>\$ 116,323</u> in FY17
	<u>\$ 141,365</u> in FY18

Proactive Policy and Compliance Outreach

- ✓ Deepen policy engagement and heighten compliance outreach to improve the effectiveness of laws within the Commission’s jurisdiction by creating a dedicated Policy unit/function that provides broad, timely, and understandable guidance on the laws and their practical application; conducts regular, robust policy analysis and evaluation; and identifies and develops workable and enforceable approaches to emerging policy issues.

One Administrative Analyst (1822) position \$ 101,323 FY17
to provide policy analysis and compliance outreach → \$ 136,365 FY18

One Senior Administrative Analyst (1823) position \$ 116,637 FY17
to provide senior level policy analysis and compliance outreach → \$ 156,948 FY18

Proactive Policy and Compliance Outreach Package Total \$ 217,960 in FY17
\$ 293,313 in FY18

Administrative Support and Transparency

- ✓ Heighten capacity to sustain timely, accurate, and complete public information and assistance (including for Immediate Disclosure Requests, Public Records Act request responses, and public meeting materials) by enhancing and tailoring administrative support roles to better match public and stakeholder information needs.

Fill existing vacant Senior Clerk Typist (1426) position.
This position has duties as assigned by the Executive Director for broad administrative support for the Commission and staff, including preparation and distribution of meeting materials and notices; handling of public inquiries and general front office duties, such as phones, photocopies, public counter assistance, and other administrative tasks as assigned. No new funding requested

Reclassify two authorized but vacant Senior Clerk(1406) positions into (\$ 89,278) FY17
one new Management Assistant (1842) position to provide a higher level of (\$ 89,278) FY17
administrative, hands-on support through a broader range of analytical and \$ 122,190 FY17
technological knowledge, skills, and abilities. → (\$ 56,365) FY17 net

Reclassify one existing, exempt Jr. Management Assistant (1840) position that functions as a Campaign Finance Officer to a Sr. Management Assistant (1844) to more appropriately align it with its more expansive and complex duties.
This position provides independent trouble-shooting guidance and hands-on training and compliance assistance to filers with reporting and e-filing obligations under the law; it analyzes, compiles and responds to data requests, and to public records and disclosure requests under state and City law; and has day to day responsibility for web and social media postings. → (\$ 109,270) FY17
\$ 138,084 FY17
\$ 28,814 FY17 net

Proactive Policy and Compliance Outreach Package Total (\$ 27,551) FY17 net

New Funding Request Total, FY17 \$ 418,028

New Funding Request Total, FY18 \$1,015,765

IV. Accountability: Indicators of Performance and Progress

Performance indicators for priority projects are valuable to ensure that the Ethics Commission can track progress toward its established goals. They are also important to enable appropriate transparency to elected policymakers and the public so that they can exercise sufficient oversight of the Commission's progress toward meeting those goals. Toward that end, Commission Staff are continuing to identify a range of accountability measures for all priority items, including, for example those shown in Attachment 2, to ensure appropriate accountability measures are in place with the beginning of the fiscal year.

Addendum: Background on Current Budget Components

The Ethics Commission's current budget is comprised of two main components: an operating budget, discussed in the foregoing sections (also referred to as "non-grant funding"), and the Election Campaign Fund ("Fund").

As a point of reference, for FY16, the Commission's expenditures can be broken down as follows:

Table 1

Ethics Commission Budgeted Expenditures, by Category, FY16

Total Salaries	\$	1,592,304	
Total Benefits	\$	654,940	
Total Salaries & Benefits			\$2,247,244
Non-Air Travel and Local Field Expenses	\$	950	
Training	\$	7,911	
Membership Fees	\$	1,767	
Court Reporters, Legal Services and Subscriptions	\$	16,763	
Electronic Filing System	\$	117,000	
Equipment, Copy Machine, Printing	\$	11,000	
Delivery and Postage	\$	4,353	
Other Current Expenses (i.e., document storage and retrieval, business cards and other miscellaneous expenses)	\$	4,000	
Total Non-Personnel			\$163,744
Total Materials and Supplies			\$13,466
IT Services from DT to Ethics	\$	46,606	
Televised Meetings	\$	24,347	
Telephone Costs	\$	6,539	
Mail Services	\$	2,033	
Rent Paid to City	\$	91,690	
Total Services of other departments to Ethics Commission			\$171,215
Total Operating Expenses			\$2,595,669

Election Campaign Fund (“Fund”). Established in the City’s Campaign Finance Reform Ordinance (“CFRO”). Under CFRO, the Fund is capped at a maximum of \$7 million, and no more than 15 percent of the total amount of funds in the Fund for any given election may be used for administering the public financing program. CFRO section 1.138(b)(2). As of January, 2016, the balance of the Fund had reached its maximum. Staff projects that disbursements for the 2016 November election to be approximately \$4,099,650. Allocations to the Fund are based on a formula of \$2.75 per resident, unless the Fund has already reached its maximum.

Prop. C Funding. One other area of funding available to the Ethics Commission derives from Prop. C. Upon passage by the voters of Prop. C in November 2015, funding was allocated in the General Reserve for an electronic filing system for Expenditure Lobbyist disclosures, and for staff costs for education and outreach during the first year of the Expenditure Lobbyist program. While the \$560,000 established for those purposes is accessible to the Ethics Commission (and will roll over if not used), those funds are not included in the Commission’s general operating budget.

Charter Mandates of the San Francisco Ethics Commission

C3.699-10 ADMINISTRATION AND IMPLEMENTATION

The Commission shall have responsibility for the impartial and effective administration and implementation of the provisions of this charter, statutes and ordinances concerning campaign finance, lobbying, conflicts of interest and governmental ethics.

C3.699-11 DUTIES

The ethics commission shall have the following duties and responsibilities:

1. To administer the provisions of the San Francisco Municipal Elections Campaign Contribution Control Ordinance, and Proposition F, adopted by voters at the June 1986 election, which appears as Appendix K to this charter or any successors to these ordinances.
2. To receive documents required to be filed pursuant to, and to otherwise administer, the provisions of the city's lobbyist registration ordinance.
3. To act as the filing officer and to otherwise receive documents in any instance where the clerk of the board of supervisors, the registrar of voters and, with respect to members of the boards and commissions, department heads would otherwise be authorized to do so pursuant to Chapters 4 and 7 of the California Political Reform Act of 1974 (Government Code sections 81000, et seq.), as amended.
4. To audit campaign statements and other relevant documents and investigate alleged violations of state law, this charter and city ordinances relating to campaign finance, governmental ethics and conflicts of interest and to report the findings to the district attorney, city attorney and other appropriate enforcement authorities. Commission investigation of alleged violations of state law shall be conducted only after the commission has provided to the district attorney and city attorney the information set forth in Section 3.699-12 and the district attorney and city attorney notify the commission that no investigation will be pursued.
5. To provide assistance to agencies, public officials and candidates in administering the provisions of this charter and other laws relating to campaign finance, conflicts of interest and governmental ethics.
6. To make recommendations to the mayor and the board of supervisors concerning (a) campaign finance reform, (b) adoption of and revisions to city ordinances laws related to conflict of interest and lobbying laws and governmental ethics and (c) the submission to the voters of charter amendments relating to campaign finance, conflicts of interest and governmental ethics. The commission shall report to the board of supervisors and mayor annually concerning the effectiveness of such laws. The commission shall transmit its first set of recommendations to the board of supervisors and mayor no later than July 1, 1995.
7. To maintain a whistleblower hot line and administer the provisions of the city's improper government activities ordinance.
8. To annually adjust any limitation and disclosure thresholds imposed by city law to reflect any increases or decreases in the Consumer Price Index. Such adjustments shall be rounded off to the nearest hundred dollars for the limitations on contributions.
9. To assist departments in developing and maintaining their conflict of interest codes as required by state law.
10. To advocate understanding of the charter and city ordinances related to campaign finance, conflicts of interest, lobbying, governmental ethics and open meetings and public records, and the roles of elected and other public officials, city institutions and the city electoral process.
11. To have full charge and control of its office, to be responsible for its proper administration, subject to the budgetary and fiscal provisions of the charter.
12. To prescribe forms for reports, statements, notices and other documents required by this charter or by ordinances now in effect or hereafter adopted relating to campaign finance, conflicts of interest, lobbying and governmental ethics.
13. To prepare and publish manuals and instructions setting forth methods of bookkeeping, preservation of records to facilitate compliance with and enforcement of the laws relating to campaign finance, conflicts of interest, lobbying and governmental ethics, and explaining applicable duties of persons and committees.
14. To develop an educational program, including but not limited to the following components:
 - (a) Seminars, when deemed appropriate, to familiarize newly elected and appointed officers and employees, candidates for elective office and their campaign treasurers, and lobbyists with city, state and federal ethics laws and the importance of ethics to the public's confidence in municipal government.
 - (b) Annual seminars for top-level officials, including elected officers and commissioners, to reinforce the importance of compliance with, and to inform them of any changes in, the law relating to conflicts of interest, lobbying, governmental ethics and open meetings and public records.
 - (c) A manual which will include summaries, in simple, non-technical language, of ethics laws and reporting requirements applicable to city officers and employees, instructions for completing required forms, questions and answers regarding common problems and situations, and information regarding sources of assistance in resolving questions. The manual shall be updated when necessary to reflect changes in applicable city, state and federal laws governing the ethical conduct of city employees.
 - (d) A manual which will include summaries, in simple, non-technical language, of city ordinances related to open meetings and public records, questions and answers regarding common problems and situations, and information regarding sources of assistance in resolving questions. The manual shall be updated when necessary to reflect changes in applicable city ordinances related to open meetings and public records.

Attachment 2

SF Ethics Commission Overview of Proposed Operating Budget, FY17 & FY18

Goal

Approach

Request

Sample Indicators of Performance

Priority

E-Filing Conversion Project

\$ 111,296 in FY17
\$ 581,087 in FY18

Improve organizational efficiencies and strengthen public tools for meaningful transparency about government actions

Establish an electronic framework for all SFEC disclosure programs that is integrated, searchable and downloadable, and that facilitates full and timely compliance.

- One IS Business Analyst position (1052) for timely project
- Project development and implementation
- development/implementation
- Conversion of existing 1840 to a IS Business Analyst-Assistant (1051) for E-filing Project Assistant

- ✓ increased number and proportion of timely filings across all mandated disclosure programs
- ✓ improved timeliness of public access to mandated disclosures
- ✓ improved methods for publicly accessing required disclosure data
- ✓ reduced time processing paper

Effective Investigations & Enforcement

\$ 116,323 in FY17
\$141,365 in FY18

Strengthen capacity to fulfill SFEC voter mandate for effective enforcement of ethics, campaign finance, disclosure, and lobbying laws

Ensure investigative and enforcement processes are timely, thorough, fair, and consistent. improve functionality of legal and investigative research, and to ensure appropriate access to process server and court reporter resources

- Balance of funds to fully fund vacant Investigator position (1823)
- One Administrative Analyst position (1822) to serve as an Investigator
- New investments for updated enforcement tools and resources

- ✓ reduced complaint timeframes
- ✓ increased types of investigations that reflect fuller breadth of laws
- ✓ higher proportion of cases that contain most serious violations or patterns of violations
- ✓ broader range of cases brought to Commission for hearing on the merits

Proactive Policy & Compliance Outreach

\$ 217,960 in FY17
\$ 293,313 in FY18

Deepen policy engagement and heighten compliance outreach to improve the effectiveness of laws within the Commission's jurisdiction

Create dedicated Policy Unit that provides broad, timely, & understandable guidance on the laws and their practical application; conducts regular, robust policy analysis and evaluation; and identifies and develops workable and enforceable approaches to emerging policy issues.

- One Senior Administrative Analyst position (1823) to serve as Senior Policy & Compliance Analyst
- One Administrative Analyst position (1822) to serve as Policy & Compliance Analyst

- ✓ increased number and frequency of compliance guidance contacts
- ✓ increased frequency and scope of evaluations of existing policies and programs for needed improvements
- ✓ more regular and timely analysis of emerging issues and development of potential policy approaches
- ✓ broadened policy outreach/input

Administrative Support and Transparency

(\$ 27,551) FY17 net

Increase organizational capacity for providing thorough and timely administrative support for Immediate Disclosure Requests and Public Records Act request responses; ensure timely compilation and distribution of accurate public information and meeting materials.

Enhance and tailor administrative support structures, roles, and tools to better match public and stakeholder information needs

- Convert 2 authorized but vacant Senior Clerk (1406) positions into one Management Assistant position (1842)
- Reclassify exempt Junior Management Assistant (1844) to Senior Management Assistant (1844)

- ✓ ensure systems that ensure full and timely IDR and PRA request responses
- ✓ increased timeliness of distribution of public materials and information
- ✓ establish baseline knowledge across agency programs of stakeholder information needs and align/re-align transparency efforts to better support identified approaches

City and County of San Francisco / Apply to host a Mayor's Senior Fellow

Your response (ID #QDWznGC11oAU)

<https://sfgov.forms.fm/apply-to-host-a-mayor-s-senior-fellow/responses/QDWznGC11oAU>

Department

Ethics Commission

Contact Name

LeeAnn Pelham, Executive Director

Contact Email

leeann.pelham@sfgov.org

Project Name

Leading Policy Practices

Project Status

✓ New

In progress

Project Description

Historically, the Ethics Commission has not had a dedicated policy staff. This has blunted its capacity to fully and most effectively engage policymakers and the public in the development and evaluation of strong and enforceable policies. As the Commission begins a new organizational chapter and works to re-align resources to better meet this challenge, a Senior Fellow for Leading Policy Practices would accelerate improvement of the Commission's capacity to deliver on one of its most important mandates.

This project would undertake senior level policy work to provide the following deliverables:

1. a comprehensive review of city reform laws and a framework for regularly conducting effective policy work, gauged by:
 - establishment of baseline analytical methods for policy evaluation
 - improved use of data-driven analyses to assess/develop recommendations
 - heightened quantity and quality of empirical information for use in evaluating policy proposals and their merit
 - increased range of issues regularly assessed
2. implementing a strategic framework to engage a broad array of stakeholders and peer agencies in assessing and developing recommendations:

develop and facilitate a series of stakeholder roundtables as a precursor to:

- o convening a day-long ‘Roadmap for Reform’ policy summit including
- o a national and state leaders’ forum to address issues surfaced by the Commission’s assessment and offer insights to enhance effectiveness of recommendations
- o a leading local practices panel to identify and share approaches that maximize effective administration and enforcement locally

gauged by:

- expanded network of interested persons engaged in reform policy discussions
- heightened awareness of issues and of ways to participate in shaping policy solutions

3. recommendations to address policy gaps and strengthen effectiveness, gauged by:

- improved workability of reforms that also reduces unnecessary complexity
- greater clarity in policies to support their enforceability
- more proactive attention to emerging issues

Why do you need a Fellow?

A Senior Fellow would play a vital role in accelerating achievement of a primary Commission goal: to strengthen effectiveness of City laws designed to curb undue influence of money in politics and support fair governmental decision making, by establishing leading practices at the Commission to examine current policies, assess emerging issues, evaluate policy gaps, and propose a comprehensive set of needed improvements, including improved use of data in policy analysis and formulation. By developing and implementing leading policy evaluation and engagement practices in the coming Senior Fellows cycle, the Commission will do much to advance its mission to ensure and sustain a framework of local political reform laws that is strong, workable, and effective.

A Senior Fellow for this project would be a valuable addition to the Commission’s work in the coming year for the reasons stated above. In addition, this work would ensure timely outreach to the state’s Fair Political Practices Commission on policy-related findings that may have a bearing on state laws as the FPPC undertakes its own review of the Political Reform Act in the coming year to identify needed improvements. Initiating this work now will take advantage of a unique opportunity to regularize interactions with state regulators going forward regarding the intersection of state and local policies, and their administration and enforcement.

A Fellow with the following experience and skills would likely provide the best match for the deliverables envisioned:

- Extensive legal and/or senior public policy analysis experience
- Policy evaluation experience, including facility with data analysis
- Report writing and presentation skills for public and policymaker audiences alike
- Group facilitation skills / public engagement experience
- Strong knowledge of campaigns and political reform
- Ability to remain politically neutral and impartial during his or her tenure as a Fellow

How would this Fellow be situated within your department?

This Fellow would work closely with and report directly to the Commission's Executive Director, LeeAnn Pelham.

The Fellow would also likely have regular interaction with the following Ethics Commission staff:

Deputy Executive Director (position expected to be filled by beginning of FY17)

Assistant Deputy Executive Director, Shaista Shaikh

Information Technology Officer, Steven Massey

Outreach & Education Officer, Pat Petersen

Campaign Finance Officer, Jarrod Flores

Additional interaction, as warranted, would be anticipated with the following:

Ethics Commission Members

Elected and appointed City officials

Representatives from national and state policy organizations working on political reform issues

Representatives from peer ethics agencies

Representatives from stakeholder, community and public interest groups

City and County of San Francisco / Apply to host a Mayor's Senior Fellow

Your response (ID #vl6mb6mrduly)

<https://sfgov.forms.fm/apply-to-host-a-mayor-s-senior-fellow/responses/vl6mb6mrduly>

Department

Ethics Commission

Contact Name

LeeAnn Pelham, Executive Director

Contact Email

leeann.pelham@sfgov.org

Project Name

Strengthening Accountability with Online Technology

Project Status

✓ New

In progress

Project Description

As the Ethics Commission modernizes its web platform in the coming year, an important opportunity exists to create improved user interfaces and a more robust user experience to support informing and engaging the public. At the same time, a critical goal of this effort is to strengthen accountability in local government by rigorously and effectively using technology to ease and effect improved compliance with the City's political reform laws. Toward that end, this project proposes to overhaul how compliance information is conveyed online, moving it from the mere presentation of information to enable engagement with information. It would create innovative new tools and resources, such as practical, interactive compliance guides designed specifically for consumption in a web- and social-media based environment.

As envisioned, this project would leverage demand for a more user-focused online experience to improve compliance across a range of programs. Building on the Commission's existing strong commitment to being a leading public disclosure agency, this project would expand the innovative use of technology to achieve the following:

1. an improved online presence for compliance materials, gauged by:
 - expanded awareness of resources available
 - heightened frequency of views/visits that engage the new tools

creation and use of methods to elicit immediate and longer-term feedback on materials and how they can be further improved upon

2. heightened compliance awareness, gauged by:

- an uptick in compliance contacts seeking additional information or guidance following a view/visit online
- more timely compliance contacts/guidance sought (i.e., prior to deadlines or actions contemplated)
- improved compliance

3. improved Commission understanding of user needs and services desired, gauged by:

- development of method to benchmark and regularly assess feedback provided following online view/visit
- implementation of benchmarking method
- implementation of regular feedback loop for assessment of service delivery

Why do you need a Fellow?

Recognizing the value of both good data and of transforming data into meaningful public information, the Ethics Commission has been a keen champion of the City's open data initiative, and has initiated steps to use data visualization for improved public disclosure. Limited existing IT staff resources are, of necessity, committed to that ongoing work and to the Commission's E-filing Conversion Project and web modernization priorities in the year ahead. A Senior Fellow would ensure the expertise and senior project management experience needed to effectively coordinate implementation of new online compliance resources in sync with those developments.

As envisioned, the scope of the project would include deliverables such as:

- enhanced compliance guides to engage candidates, their treasurers, consultants, and donors in understanding and complying with City laws.

- new step-by-step tools for understanding permit consultant and major developer requirements

- interactive, practical FAQs and materials on a range of topics, such as:

- Audits: What to Expect When You're Expecting One

- The Administrative Enforcement Process: Your Right to Know

- Beyond Form 700: Tools to Avoid Conflicts of Interests

- Lobbying in the City: What to Know

- If You Go: Navigating Ethics & the Revolving Door

A Fellow with the following experience and skills would likely provide the best match for the deliverables envisioned:

- Experience assessing and designing online information with a user-experience focus

- Technical writing skills – translating technical and legal documents into understandable terms for layperson audience

- Graphic design orientation and experience that creatively visualizes and organizes layout of information

- Strong writing and communication skills

- Experience developing online tools to gather and assess user feedback

- Project management skills

Writing – translating technical or legal documents into understandable terms for layperson audience
Familiarity with ADA compliance in web environment
Strong listening skills and collaborative approach to teamwork

How would this Fellow be situated within your department?

This Fellow would work closely with and report directly to the Commission's Executive Director, LeeAnn Pelham.

The Fellow would also have regular interaction with the following Ethics Commission staff:

Information Technology Officer, Steven Massey

Assistant Deputy Executive Director, Shaista Shaikh

Education/Outreach Officer, Pat Petersen

Additional interaction would be anticipated with a representative selection of individuals, TBD, whose experience external to our agency as compliance material users will help inform project deliverables.

City and County of San Francisco / Apply to host a Mayor's Senior Fellow

Your response (ID #LXAdnjeIWTLq)

<https://sfgov.forms.fm/apply-to-host-a-mayor-s-senior-fellow/responses/LXAdnjeIWTLq>

Department

Ethics Commission

Contact Name

LeeAnn Pelham, Executive Director

Contact Email

leeann.pelham@sfgov.org

Project Name

Audit Effectiveness/"T3" Innovations

Project Status

✓ New

In progress

Project Description

This project seeks a seasoned professional experienced in managing and evaluating audits to improve the Commission's capacity for timely, thorough and effective campaign and lobbying audits. Historically challenged in concluding audits in the timeliest manner to ensure the timeliest resolution of audit findings, the Commission has recently virtually eliminated its audit backlog. With a relatively new lobbying audit program underway, the Commission proposes to use a Senior Fellow to assess current audit methods and approaches, develop a strategic audit plan for improvements, and implement identified recommendations. Innovations would include new audit tools, standardized templates, and clear timelines for achieving more efficient, effective and transparent audits.

This project would yield program improvements without sacrificing audit thoroughness or quality, and would include the following deliverables:

1. new or improved compliance tools for use during campaigns or pre-audit period (check lists, electronic aggregation tables, other) and new, standardized audit templates for use during audit (entrance / exit meetings, document requests, testing, workpaper documentation), gauged by:
 - increased savings from reduced hours required to onboard new auditors
 - improved consistency in application of procedures and policies during periods of attrition

increased savings from reduced hours needed to document and review audit findings
 reduction in number of material findings
 increased savings from reduced hours auditees need to respond to audit findings

2. standardized time frames and improved predictability for all audit phases, gauged by:

reduced costs in planning for audits
 more nimble re-deployment of auditors during non-peak phases

3. new or improved audit guides to reinforce audit understanding and procedures:

City Campaigns: A User's Guide to a Clean Audit
 Lobbying Audits: What to Expect When You're Expecting One

4. new transparency approaches, including data visualization to broaden public understanding about audit purpose, status and findings

Why do you need a Fellow?

A fundamental mandate for the Ethics Commission, audits of campaign and lobbyist compliance with applicable laws are a cornerstone of ensuring accountability in campaign and lobbying in the City. Complete and timely audits provide an important public accounting of candidates' and lobbyists' activities, and ensure appropriate resolution of material findings through enforcement action, when warranted. Audits help ensure the public that applicable rules are applied fairly, consistently, and thoroughly, and that those whose practices materially fail to comply with the requirements of the law will be held to account for those findings.

Having recently reduced its campaign audit backlog, and with an inaugural year of lobbying audits nearing completion, the Commission's audit director (who also functions as the Commission's Assistant Deputy Executive Director) and the Commission's recently-appointed Executive Director are at a critical juncture to initiate a self-assessment of the department's audit programs. Overall, however, the Commission's limited staffing resources and competing organizational demands make achieving this key project unlikely within the next year. A Senior Fellow to develop a strategic audit plan, including new audit tools, templates, and timeframes, would provide critically needed hours - and the unique knowledge, skills, and abilities to manage this vital project -to enable the Commission to implement needed and lasting improvements in its core audit work.

A Fellow with the following experience and skills would likely provide the best match for the deliverables envisioned:

Significant experience conducting, managing, and evaluating audits and audit programs
 Writing skills, including preparation of reader-friendly audit reports
 Strong facilitation and listening skills; ability to elicit information and ideas across communication styles
 Effective presentation skills
 Familiarity with campaigns and political reform
 Ability to remain politically neutral and impartial during tenure as Fellow

How would this Fellow be situated within your department?

This Fellow would work closely with and report directly to the Commission's Executive Director, LeeAnn Pelham.

The Fellow would also have regular interaction with the following Ethics Commission staff:

Assistant Deputy Executive Director, Shaista Shaikh

Information Technology Officer, Steven Massey

Commission Auditors and Investigators, as needed, for input to understand current methods, approaches, challenges, and ideas for improvement

Additional interaction, as warranted, would be anticipated with the following:

Candidates and lobbyists who have been audited; other agencies (e.g. City Attorney, District Attorney) that have used Commission audits; other stakeholders that may regularly use or have expressed an interest in Commission audits and their findings

E-Filing Conversion Project

Ethics Commission

E-Filing Conversion Project

Ethics Commission

Project Objective

- Strengthen government transparency and accountability.
- Simplify steps needed to comply with the law.
- Improve public access to information.
- Increase accuracy when completing disclosure forms.
- Increase efficiency of processing forms.
- Leverage existing electronic systems city-wide.

Major Stakeholders

- Public & Press
- Department Filing Officers
- Designated (Department) Filers of Conflict of Interest Forms (ex. Form 700)
- Regulated Community (Developers, Consultants, & Contractors)

E-Filing Conversion Project

Ethics Commission

Problem Trying to Solve

1. Paper disclosure forms are manually processed and difficult for public to access:

Forms	Total Paper Filings Per Year
Form 700 (Designated Filers Only)	> 3,200 annuals
Sunshine Ordinance Declaration, Certificate of Ethics Training & Gifts of Travel Reports	> 820
Permit Consultants, Major Developers, Campaign Consultants, City Contracts	> 830
Total	> 4,850

2. Campaign disclosure data on SF Open Data is too complex and lacks critical research information.

E-Filing Conversion Project

Ethics Commission

Project Implementation Stages/Phases

	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
Dates:	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021
Description:	Sunshine Cert. Ethics Training Cert. Gift Disclosure Report	City-wide Form 700 (Jan. 1, 2018) Campaign Finance API (June 30, 2018)	Major Developer Report	City Contract Report	Permit Consultant Report Campaign Consultant Report

E-Filing Conversion Project

Ethics Commission

Project Budget	FY 16-17	FY 17-18
Number of FTE	1	1
FTE Classifications	1052	1052
Salary & Fringe	\$111,296	\$149,771
Software	-	-
Hardware	-	-
Professional Services	\$90,000	\$80,000
Materials & Supplies	-	\$50,000
Total Project Cost	\$201,296	\$279,771




E-Filing Conversion Project

Ethics Commission

Start Date: July 1, 2016

End Date: June 30, 2021

Total Project Cost	Total COIT Funding To Date	Total Other GF Funding	Total NGF Funding	Total NGF + GF Funding	Total Spent
\$1,517,882	-	\$50,000	-	\$50,000	-

	Status	Comment
Scope		
Schedule		
Budget		Commission has existing funds of \$50,000 to pay for first-year of City-wide Form 700 licenses.
Risks	<ul style="list-style-type: none"> - Meet and confer with unions regarding e-filing of Form 700 could delay deployment. - Legislative changes are necessary to require electronic filing of some forms. 	

Senior Policy Analyst (Senior Administrative Analyst, 1823)

The Senior Policy Analyst will provide direct services to a wide array of stakeholders

Elected Officials, board and commission members, department heads, city and county employees, candidates, treasurers, fundraisers, contributors, independent spending sources, community organizations, other governmental and non-profit organizations, and members of the public

The Senior Policy Analyst is critical to perform core, Charter-mandated services

- ✓ **Research and provide advice** on matters involving the practical application of campaign finance, ethics, and lobbying laws
- ✓ **Research and develop policy recommendations** on complex public policy issues
- ✓ **Conduct complex studies, analyses and prepare reports** that analyze broad data sets, identify patterns and trends, and make legislative or regulatory recommendations in complex public policy areas to clarify the law and strengthen its effectiveness, including in the following areas:
 - campaign activities, including fundraising, expenditures, and reporting of candidates and consultants
 - conflict of interest and governmental conduct provisions of city law, including waiver analyses, post-employment restrictions, and appropriate uses of public position and resources
 - lobbying regulations for contact lobbyists and expenditure lobbyists
 - public campaign financing systems
 - independent expenditure activities, including coordination restrictions, and transparency in reporting
 - candidate-controlled ballot measure activity
 - behested donations
 - permit consultants and major developer activities
- ✓ **Research, develop, and write informational content** to promote compliance with campaign finance, ethics, and lobbying laws through better understanding of the laws, their purpose, and how they are applied in practice

With this position

- ☐ Compliance rates are likely to improve as those regulated will be provided more timely and tailored assistance
- ☐ Those subject to City laws will have improved access to key information about deadlines and requirements of the law
- ☐ A consistent feedback loop will be created to ensure those impacted by the laws have broad input into policy analysis, evaluation, and development
- ☐ Policy discussions of complex and emerging policy issues will be thorough, empirically-based, and timely
- ☐ The City's framework of political reforms will be reviewed regularly to help ensure it is strong, comprehensive, and effective
- ☐ Investigative staff resources can be re-committed solely to pursuing investigative and enforcement cases and their resolution, rather than continuing to be required to perform policy and programmatic work.

Without this position

- ☐ Compliance rates will plateau or decrease, exposing filers to unnecessary late fees and fines
- ☐ Timely information about the law's requirements and deadlines will be impeded and/or delayed
- ☐ Feedback mechanisms will be sporadic and/or inconsistent
- ☐ The Commission's public policy discussions will likely be more reactive, anecdotal in nature, and delayed
- ☐ The City's political reform laws will be reviewed irregularly, placing their relevance and effectiveness at risk
- ☐ Investigative staff resources will continue to have a shared responsibility for policy and programmatic work, and will be prevented from devoting 100% of their time to pursuing investigative and enforcement cases and their resolution

KPIs associated with the Senior Policy Analyst position

- ✓ **increased number and frequency of compliance guidance contacts**, such as
 - ☐ number and type of advice calls fielded;
 - ☐ compliance advice issued;
 - ☐ waivers evaluated;
 - ☐ category of filers assisted-such as candidate, treasurer, department head;
 - ☐ breadth of subject matter of areas addressed
- ✓ **increased frequency and scope of evaluations of existing policies and programs for needed improvements**, such as
 - ☐ nature and timing of assessments;
 - ☐ subject matter of areas assessed;
 - ☐ type and scope of recommendations
 - ☐ nature and timing of program/procedural change enacted as a result of program assessment
- ✓ **more regular and timely analysis of emerging issues and development of potential policy approaches**, such as
 - ☐ regularity of assessments scheduled for Commission hearing and discussion;
 - ☐ number and type of issues identified for policy development;
 - ☐ number and type of issues identified for policy revision;
 - ☐ number and type of issues identified for clarified or enhanced compliance guidance
 - ☐ regularity and type of assessments provided to BOS for their information and consideration
 - ☐ regularity and type of policy proposals provided to BOS for their information and action
- ✓ **broadened policy outreach/input**, such as
 - ☐ number, type and timing of outreach session conducted on policy assessments/proposals
 - ☐ number and types of organizations and stakeholders participating in outreach sessions
 - ☐ development and implementation of feedback mechanism to gauge participants' satisfaction with information provided at outreach session
 - ☐ degree of positive feedback received on usefulness of policy information and outreach
- ✓ **impact of compliance contact**, such as
 - ☐ improved compliance rates with on-time filing deadlines increased number and proportion of timely filings across all mandated disclosure programs,
 - ☐ development and implementation of feedback mechanism to gauge satisfaction with timeliness, quality, and clarity of information provided through compliance contact
 - ☐ degree of positive feedback received on timeliness, quality, and clarity of compliance contact
 - ☐ degree of positive feedback on likelihood that individual would contact the Commission with questions or to seek compliance guidance again in the future

Policy Analyst (Administrative Analyst, 1822)

The Policy Analyst will provide direct services to a wide array of stakeholders

Elected Officials, board and commission members, department heads, city and county employees, candidates, treasurers, fundraisers, contributors, independent spending sources, community organizations, other governmental and non-profit organizations, and members of the public

The Policy Analyst is critical to perform core, Charter-mandated services

- ✓ **Research and provide advice** on matters involving the practical application of campaign finance, ethics, and lobbying laws
- ✓ **Research and develop policy recommendations** on public policy issues
- ✓ **Conduct studies, analyses and prepare reports** that analyze broad data sets, identify patterns and trends, and make legislative or regulatory recommendations in a range of public policy areas to clarify the law and strengthen its effectiveness, including in the following areas:
 - campaign activities, including fundraising, expenditures, and reporting of candidates and consultants
 - conflict of interest and governmental conduct provisions of city law, including waiver analyses, post-employment restrictions, and appropriate uses of public position and resources
 - lobbying regulations for contact lobbyists and expenditure lobbyists
 - public campaign financing systems
 - independent expenditure activities, including coordination restrictions, and transparency in reporting
 - candidate-controlled ballot measure activity
 - behested donations
 - permit consultants and major developer activities
- ✓ **Research, develop, and write informational content** to promote compliance with campaign finance, ethics, and lobbying laws through better understanding of the laws, their purpose, and how they are applied in practice

With this position

- ☐ Compliance rates are likely to improve as those regulated will be provided more timely and tailored assistance
- ☐ Those subject to City laws will have improved access to key information about deadlines and requirements of the law
- ☐ A consistent feedback loop will be created to ensure those impacted by the laws have broad input into policy analysis, evaluation, and development
- ☐ Policy discussions of complex and emerging policy issues will be thorough, empirically-based, and timely
- ☐ The City's framework of political reforms will be reviewed regularly to help ensure it is strong, comprehensive, and effective
- ☐ Investigative staff resources can be re-committed solely to pursuing investigative and enforcement cases and their resolution, rather than continuing to be required to perform policy and programmatic work.

Without this position

- ☐ Compliance rates will plateau or decrease, exposing filers to unnecessary late fees and fines
- ☐ Timely information about the law's requirements and deadlines will be impeded and/or delayed
- ☐ Feedback mechanisms will be sporadic and/or inconsistent
- ☐ The Commission's public policy discussions will likely be more reactive, anecdotal in nature, and delayed
- ☐ The City's political reform laws will be reviewed irregularly, placing their relevance and effectiveness at risk
- ☐ Investigative staff resources will continue to have a shared responsibility for policy and programmatic work, and will be prevented from devoting 100% of their time to pursuing investigative and enforcement cases and their resolution

KPIs associated with the Policy Analyst position

- ✓ **increased number and frequency of compliance guidance contacts**, such as
 - ☐ number and type of advice calls fielded;
 - ☐ compliance advice issued;
 - ☐ waivers evaluated;
 - ☐ category of filers assisted-such as candidate, treasurer, department head;
 - ☐ breadth of subject matter of areas addressed
- ✓ **increased frequency and scope of evaluations of existing policies and programs for needed improvements**, such as
 - ☐ nature and timing of assessments;
 - ☐ subject matter of areas assessed;
 - ☐ type and scope of recommendations
 - ☐ nature and timing of program/procedural change enacted as a result of program assessment
- ✓ **more regular and timely analysis of emerging issues and development of potential policy approaches**, such as
 - ☐ regularity of assessments scheduled for Commission hearing and discussion;
 - ☐ number and type of issues identified for policy development;
 - ☐ number and type of issues identified for policy revision;
 - ☐ number and type of issues identified for clarified or enhanced compliance guidance
 - ☐ regularity and type of assessments provided to BOS for their information and consideration
 - ☐ regularity and type of policy proposals provided to BOS for their information and action
- ✓ **broadened policy outreach/input**, such as
 - ☐ number, type and timing of outreach session conducted on policy assessments/proposals
 - ☐ number and types of organizations and stakeholders participating in outreach sessions
 - ☐ development and implementation of feedback mechanism to gauge participants' satisfaction with information provided at outreach session
 - ☐ degree of positive feedback received on usefulness of policy information and outreach
- ✓ **impact of compliance contact**, such as
 - ☐ improved compliance rates with on-time filing deadlines increased number and proportion of timely filings across all mandated disclosure programs,
 - ☐ development and implementation of feedback mechanism to gauge satisfaction with timeliness, quality, and clarity of information provided through compliance contact
 - ☐ degree of positive feedback received on timeliness, quality, and clarity of compliance contact
 - ☐ degree of positive feedback on likelihood that individual would contact the Commission with questions or to seek compliance guidance again in the future

Information Systems Business Analyst (1052)

The position will directly support the Commission's top priority by providing critical duties to implement the E-Filing Conversion Project, which will

- ✓ **Strengthen public tools for meaningful transparency and promote governmental accountability while improving organizational efficiencies** by creating a network of online systems that provide a comprehensive, integrated, searchable and downloadable framework for all Commission public disclosure programs.

The IS Business Analyst position provides critical duties required to implement this priority project.

- Cost-benefit analysis
- Feasibility analysis
- Systems design and drafting specifications
- Develops scope and project planning
- Implementation and testing
- Documentation and user training
- Post-implementation support

With this position

- ☐ Cooperation between IT and Policy staff to address policy issues that affect disclosure systems and open data prior to systems design
- ☐ Develop specifications for integrating additional disclosure categories into core e-filing system
- ☐ Timely contract development, vendor negotiations, and completion of the City professional services contract process for the E-Filing Conversion Project
- ☐ Coordination with vendor on project planning and implementation
- ☐ Joint systems testing with vendor prior to deployment
- ☐ Responsive support for e-filers and staff at all City departments
- ☐ Timely support and continued development of existing core e-filing services

Without this position

- ☐ The Commission would be unable to proceed with the proposed project timeline because existing IT resources are at capacity
- ☐ With existing IT resources at capacity, core e-filing services will have delayed support and minimal improvement.

KPIs associated with the Information Systems Business Analyst position

The Ethics Commission has identified the following KPIs for its E-Filing Conversion Project has identified the following project KPIs: 1) improved timeliness of public access to disclosure records; 2) increased percent of disclosure record types accessible to the public online; 3) increased percent of disclosure data types available to the public in open datasets; 4) reduced time spent responding to requests for disclosure data; and 5) reduced time spent processing paper.

To support accomplishment of these project goals, the following KPIs will be used in connection with this position:

- Coordination between IT and Policy staff to address policy issues that affect disclosure systems and open data prior to systems design
 - For 100% of all proposed policies, identify transparency components necessary for effective online disclosure during policy development stage
 - For 100% of all policies under evaluation, identify transparency components necessary for effective online disclosure during policy evaluation stage
- Develop specifications for integrating additional types of disclosure into existing e-filing systems
 - For 100% of disclosure types to be integrated into existing systems, develop a baseline knowledge of the program area and its requirements
 - For 100% of disclosure types to be integrated into existing systems, identify any gaps in disclosures currently captured
 - For all gaps in disclosures currently captured that are identified, coordinate on possible remedies with Policy Staff
- Timely contract development, vendor negotiations, and completion of the City professional services contract process for the E-Filing Conversion Project
 - Identify contract scope, deliverables and schedule within established timeframes
 - Manage contract review and approval in compliance with all required procedures
- Coordination with vendor on project design, planning and implementation
 - Develop and document features and functionality per contract scope and within contract's established deadlines
 - Establish and adhere to Project Communication Plan to ensure project design, planning, and implementation stay on schedule
 - Monitor and provide regular project status reports to IT Manager and Executive Director
- Perform joint systems testing with vendor, and user testing, prior to deployment
 - Adhere to testing timeframes established as one contract deliverable
 - Document and coordinate with vendor to resolve any identified bugs within testing timeframe
 - Establish methods and timeframe for user testing and feedback, and implement them according to schedule
 - Prepare and submit documentation of project completion for departmental approval
- Perform user training and support
 - For each E-Filing Conversion Project component, develop a user training module for launch with deployment
 - Provide direct ongoing technical support for e-filers as each E-Filing Conversion Project component comes online
 - Establish and adhere to a Policy Coordination Plan to ensure guidance on policy or program-related matters are referred to and handled by policy staff.

Investigative Analyst (Administrative Analyst, 1822)

The Investigative Analyst will directly support one of the Ethics Commission's core priorities.

The Ethics Commission is charged under the City Charter with the independent, impartial, and effective administrative enforcement of governmental ethics, conflicts of interests, campaign finance, public disclosure and lobbying laws for the City and county of San Francisco.

The Investigative Analyst position is critical to the capacity of the Ethics Commission to fulfill its Charter-based enforcement mandate.

The Investigative Analyst conducts investigations and performs complex investigative research and analyses to ensure investigations into alleged violations of the law are pursued and resolved timely, and with objectivity, fairness, thoroughness, and consistency. The position obtains and evaluates testimonial and documentary evidence, prepares investigative reports, recommends appropriate action on complaints filed, prepares and argues cases and recommendations for their resolution to the Executive Director and Commission.

With this position

- ☐ The Ethics Commission will have the capacity to reduce or eliminate its backlog of complaints and enforcement cases
- ☐ The Ethics Commission will have the capacity to initiate investigative reviews when warranted, creating a more proactive enforcement agency as envisioned by San Francisco voters
- ☐ More timely and robust investigations and enforcement by the Commission, when warranted, will promote an increased deterrent effect by strengthening awareness of and compliance with the laws

Without this position

- ☐ The Commission will not be able to ensure its backlog of complaints and enforcement cases is reduced or eliminated
- ☐ The Commission's ability to initiate investigations when warranted will be stifled, minimizing its ability to proactively pursue and resolve alleged violations of the law
- ☐ The Commission's ability to ensure timely, robust investigations will be compromised, creating a greater likelihood that violations of the law will go undetected or not addressed

KPIs associated with the Investigative Analyst position

- ✓ **reduced complaint resolution timeframes**, such as
 - ☐ reduced timeframes between complaint receipt and conclusion of preliminary review
 - ☐ increased proportion of formal complaints resolved within shorter timeframes;
 - ☐ reduced number of Whistleblower retaliation complaints needing 90-day notices to complainant (i.e., reduced number remaining under preliminary review at that point in time following receipt of complaint)
- ✓ **increased breadth in types of investigations pursued**, such as
 - ☐ number, percentage, and nature of investigations, by substantive area
 - ☐ number, percentage and nature of investigations initiated by staff based on apparent violations identified through a proactive review of data required to be publicly disclosed
 - ☐ number and nature of investigations dismissed, by substantive area

- ✓ **higher proportion of cases that contain most serious violations or patterns of violations**, such as
 - ☐ number, percentage and nature of investigations that result in probable cause determinations, by substantive area
 - ☐ number and nature of counts identified in probable cause determinations
 - ☐ number and nature of counts resolved through stipulation, decision and order (settlement agreements with Commission)
- ✓ **broader range of cases brought to Commission for hearing on the merits**, such as
 - ☐ number and nature of counts in cases adjudicated in a hearing before the Commission
 - ☐ number and nature of counts the Commission determines to be actual violations through an adjudicatory hearing
 - ☐ number and nature of counts dismissed by the Commission through a hearing on the merits