



# San Francisco Ethics Commission

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November 8, 2024

Honorable Members of Fair Political Practices Commission  
1102 Q Street, Suite 3000  
Sacramento, CA 95811

**Re: AB-1170 – Electronic Filing of Statements of Economic Interests (SEIs)**

Dear Members of the Fair Political Practices Commission:

Thank you for this opportunity to provide input on the implementation of AB 1170 regarding electronic filing of Statements of Economic Interests (SEIs), or Form 700s. The San Francisco Ethics Commission strongly urges the FPPC to permit the City of San Francisco's 87200 Form 700 filers to continue filing electronically with the San Francisco Ethics Commission's e-filing system in lieu of the FPPC's system, allowing for a seamless filer experience that maintains a high level of transparency and accessibility for the public.

We support the FPPC moving to require electronic filing of the Form 700 for all 87200 filers, particularly for those filers in jurisdictions that do not already file electronically. However, in San Francisco, 87200 filers have been filing their Form 700s electronically with the Ethics Commission since 2014. This Form 700 data is then made available to the public in searchable datasets. These datasets include disclosed economic interests from not just the City's 87200 filers, but all of the City's Form 700 filers (more than 5,500 filers in total). The City's system allows the public to easily view and analyze data from all Form 700 filers across the City. If the City's 87200 filers were to stop filing locally and only file with the FPPC, the people of San Francisco would lose a vital transparency resource as the City's datasets would be missing critical information about these important City filers. To avoid this, 87200 filers may soon have to double file their Form 700s with both the Ethics Commission and the FPPC, which we would like to avoid if possible.

Given this, we recommend the FPPC work with Ethics Commission to continue allowing a system through which the City's 87200 filers continue filing their Form 700s electronically with the Ethics Commission. We propose this approach for the following reasons:

- 1. Enhanced Transparency and Public Access:** San Francisco's e-filing system provides the public with both redacted and unredacted versions of Form 700s, available immediately through our online public access portal for redacted filings and at public library kiosks for unredacted filings. To access unredacted information through the FPPC's current system, a public records request would need to be filed. This process reduces transparency and delays the public's access to critical data. Having filings available in the Ethics Commission's system ensures the immediate availability of filings, maximizing transparency without requiring additional steps from the public or FPPC's staff.

2. **Comprehensive Coverage of San Francisco Officials:** The FPPC’s public access site currently limits visibility to only certain 87200 filers in San Francisco, such as the Mayor and Board of Supervisors, but excludes other key roles like the City Administrator, Treasurer, and Planning Commission members. The Ethics Commission’s management of filings ensures comprehensive access to all San Francisco 87200 filer disclosures in one accessible location, avoiding the need for duplicative postings or public confusion arising from incomplete data on the FPPC’s platform.
3. **Modern Search Tools Support Compliance, Research, and Enforcement:** San Francisco’s e-filing system supports advanced search capabilities within filings, allowing users to efficiently locate specific economic interests across all Form 700 filings. This feature is especially valuable to local journalists, advocates, and researchers who frequently use it and have regularly given positive feedback to our office about how important the Ethics Commission’s Form 700 system is to their work. We have seen an increase in high quality reporting on Form 700 disclosures since the Ethics Commission instituted searchable electronic filing. The FPPC’s system lacks this functionality, which would inhibit efficient access to public data regarding San Francisco’s top public officials. Additionally, the Ethics Commission’s system supports tracking of compliant and non-compliant filers, which support our compliance program and provides important accountability.

The advanced search features of the Ethics Commission Form 700 system also support critical enforcement work by allowing the Enforcement Division to run advanced queries of Form 700 data in order to identify conflicts of interests, unlawful sources of income, and other violations. These core enforcement functions would be severely hampered if San Francisco’s highest level officials no longer filed the Form 700 with the Ethics Commission. This would roll back some of the major advances our agency has made in recent years to proactively investigate for ethics violations.

4. **Open-Data Integration and Machine-Readable Formats:** San Francisco’s e-filing system includes an API that integrates with the city’s open data portal, making redacted Form 700 data accessible in machine-readable formats. This allows for comprehensive data analysis and transparency that are unavailable through the FPPC’s platform. Losing this feature would be a significant setback for open government in San Francisco, where this data is widely used by researchers and the public.
5. **Avoiding Duplicative Filing Burdens on Filers:** Having San Francisco’s 87200 filers start using the FPPC’s e-filing system could lead to increased complexity and frustration for City’s 87200 filers, who would need to submit their Form 700 twice—once to the Ethics Commission and once to the FPPC—in order to comply with existing local requirements. Having filers enter information into two systems also increases the likelihood of filers mistakenly creating discrepancies between each copy of their filing.

**6. Solutions Currently Exist to Provide the FPPC with San Francisco Form 700 Disclosures:**

Currently, data exchanges between the two electronic filing systems ensure that filings submitted to San Francisco are automatically forwarded to the FPPC. Continuing this data exchange would alleviate the need for dual submissions and maintain streamlined compliance. If this solution is no longer feasible, we urge the FPPC to consider alternative technical integrations with our vendor, Netfile, to preserve the efficiencies of automated data sharing. This type of solution eliminates double filing and maintains the critical public information features described above.

The Ethics Commission shares the FPPC's objectives of transparency, accountability, and efficient data access. We are ready to work closely with the FPPC to develop a solution that achieves the purpose and intent of AB 1170 while maintaining the high standards of public accessibility that San Francisco's e-filing system provides without unnecessarily burdening 87200 filers with a dual-filing requirement.

Thank you for your consideration.

Sincerely,



**Patrick Ford**  
Executive Director  
San Francisco Ethics Commission