

OFFICE



**TRANSPARENCY
UPGRADES** *for*
**ETHICS
COMMISSIONS**

CLC

ADVANCING
DEMOCRACY
THROUGH LAW

Acknowledgments

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Purpose

The purpose of this CLC analysis is to provide state and local ethics commissions with innovative transparency solutions to improve how they effectively implement their ethics programs. Specifically, the project highlights proven transparency upgrades that ethics commissions have used to better:



1.

educate and advise
government officials



2.

engage and inform
the public



3.

enforce the law against
the noncompliant

We identified 10 tools that ethics commissions can implement to promote those goals.

We interviewed nine ethics commissions that we identified as exemplifying each of the tools we highlight. This project focuses on upgrades that are effective yet relatively simple and inexpensive to adopt without creating any new laws, rules or regulations.

Executive Summary

Ethics commissions serve a vital role in democracy by upholding transparency principles and administering various laws and rules intended to preserve the public's trust in government.

When public officials are well-informed of the laws that govern their public service and when the public has full access to information about their public officials, government can be held accountable and the public's trust grows.

Limited staff, technology, funding and other resources create challenges for ethics commissions to fulfill their important missions. In addition, ethics commissions often have the complex duty of serving diverse stakeholders, including government officials and employees, lobbyists, government contractors, journalists and the general public. CLC designed this analysis as one solution for ethics commissions that face such challenges but are interested in exploring proven tools that are efficient for small staff and relatively inexpensive. We identified the top 10 tools for ethics commissions to implement in order to better promote transparency. We researched and interviewed state and local ethics commissions

in a diverse set of jurisdictions across the country to determine which commissions are superior examples of the following 10 tools that we identified:

1. Dashboard of Public Disclosures
2. Heat Map of Enforcement Actions
3. Educational Content for Social Media
4. Complaint Portal
5. Searchable, Sortable and Downloadable Public Disclosures
6. Advanced Search of Advisory Opinions
7. Online Ethics Advice
8. Public Hearing Virtual Attendance
9. E-Newsletters and Webinars for Public
10. Citizen-Minded Homepage

For each tool, the relevant ethics commissions provided practical insight on why they developed the tool, the benefits, the implementation costs and the lessons from their experience. Although no commission implemented all of the tools, any ethics commission can maximize its transparency and better serve the public and government officials by adopting any or all of these tools.



Introduction

This CLC analysis is designed to serve as a tool as ethics commissions continue to make their work more transparent, accessible and accountable to the public.

Public officials are responsible for crafting, administering and enforcing laws that impact the lives of those they serve. The public has a right to know that they are working in the best interest of those they serve, rather than using their position of power to enrich themselves or their powerful friends.

Ethics laws at the local, state and federal levels have been passed to increase transparency and hold those in public service accountable when they behave in an unethical manner or in ways that could undermine their ability to do their jobs. Without the enforcement of ethics laws, public officials have the opportunity to favor the priorities of donors and special interests away from the public's watchful eye.

One action communities have taken to make information available to the public and to hold public officials accountable is the establishment of ethics commissions. Ethics commissions have been a staple of American democratic accountability for more than 50 years. The commissions promote voter confidence in policymakers and political institutions by ensuring that the groups under their jurisdictions follow ethics laws. They are “watchdogs for the public,” ensuring that “conflicts of interest are exposed, financial dealings are done ‘in the daylight’ and the decision-making process is transparent.” The work of ethics commissions secures the public's trust and confidence, helping to make sure that public officials prioritize the interests of the public.

For ethics commissions to fulfill their role, they must operate with the same transparency and accountability that they expect from the public officials, lobbyists, government contractors and other stakeholders they oversee. Voters have the right to know who is trying to influence their public officials. Transparency is therefore essential to the mission of ethics commissions.

Ethics commissions constantly face challenges in making their work transparent. Providing public records to the public in a meaningful way can overwhelm commissions with large data sets that are difficult and often complex. Making the information provided to the public both visually impactful and digestible requires certain resources and skills that ethics commissions may not automatically have available. Educating and engaging stakeholders requires more thoughtfulness and creativity in a world where attention spans are shorter and the reliance on digital communication has increased. In addition, ethics commissions across the country serve diverse constituencies and have different operating budgets.

These challenges, however, present new opportunities to enhance transparency. It is incumbent upon each commission to use all tools at their disposal to ensure their work is as transparent and accessible as possible. These efforts will help ethics commissions build and maintain the public's trust. This review of state and local ethics commissions' tools aims to demonstrate the innovations of ethics commissions, show the benefits of those innovations and provide a road map for how ethics commissions can implement these measures to ensure that those in public service work in the best interests of those they serve.

01

DASHBOARD OF PUBLIC DISCLOSURES

What Is It?

A dashboard of public disclosures is a display on the ethics commission's website that provides an at-a-glance understanding of public records by summarizing information into categories and highlighting trends. A dashboard uses objective metrics to provide impartial summaries. The summarized information includes lobbying reports; financial disclosure reports; gift disclosures; and campaign finance records.

Why It Matters

One challenge for ethics commissions is fulfilling their function as a source for public records in a way that does not overwhelm the intended audience with voluminous and unintelligible information. A dashboard allows the public to easily view important data in a way that is coherent and intuitive. The result includes better-informed government officials, employees and members of the public.

Benefits



ENGAGEMENT

Attracts the public and officials to use and explore public records



EDUCATION

Digests dense data while informing users of the scope of available public records and the underlying disclosure requirements

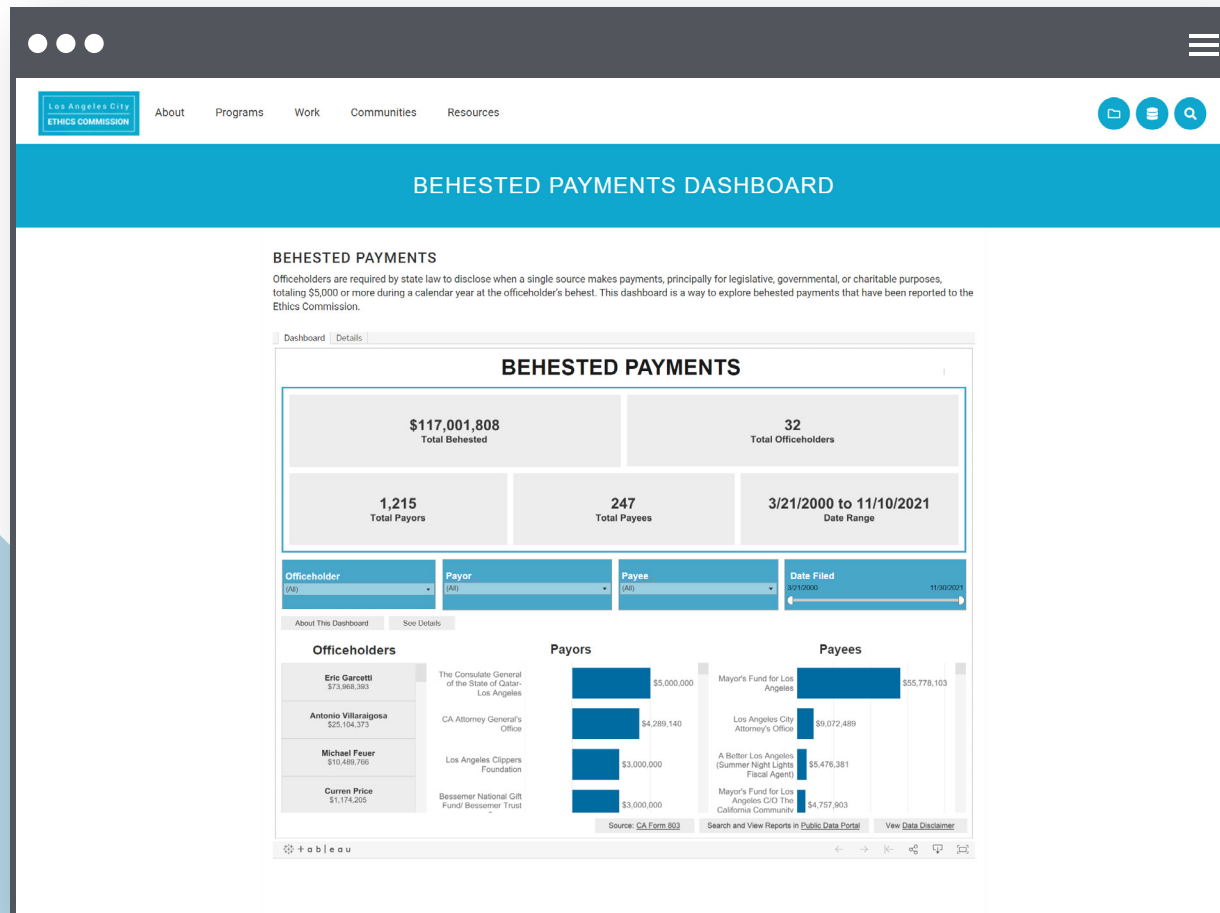


ENFORCEMENT

Exposes potential violations to the public and ethics commission staff

Los Angeles City Ethics Commission

The Los Angeles City Ethics Commission (LA City Ethics Commission) developed a dashboard dedicated to behested payments. A unique feature of California law, behested payments are payments that occur when an elected official solicits payments from one individual or organization to another individual or organization. In Los Angeles, the general public has expressed a particular interest in knowing which elected officials solicit behested payments.



Summary of conversation with David Tristan, executive director:



REASONS FOR DEVELOPING DASHBOARD

The LA City Ethics Commission is required to administer the disclosure of behested payments. In the past few years, the public and government officials began asking questions about behested payments because government officials were raising substantial amounts of money through behested payments. Before the dashboard, the LA City Ethics Commission displayed the PDF versions of the filings online. However, the LA City Ethics Commission decided to make all of its public data more accessible and digestible for the general public. The LA City Ethics Commission decided to develop the Behested Payments Dashboard to further this goal, especially in light of the increased public interest.



SUCCESS OF THE DASHBOARD

As a result of the user-friendly view of the information, the general public is more eager to engage with the information. For the LA City Ethics Commission, the Behested Payments Dashboard (as well as the other dashboards the commission has developed) makes compliance easier to facilitate. Before, compliance involved reviewing pages of disclosures to audit filings and find discrepancies. Now, the LA City Ethics Commission electronically sorts through filings for audits, and the public alerts the commission when they notice potential noncompliance based on the dashboard.



IMPLEMENTATION COSTS

The initial costs centered around manually uploading the historical paper filings before switching to a fully online database. The LA City Ethics Commission intentionally selected behested payments as the first dashboard because the filings were small and the data was relatively simple to enter in an online database. The other costs include the time devoted by internal IT staff and the costs of developing a customized platform. Outside consultants were also hired, but internal employees provide most of the IT support. The LA City Ethics Commission had to budget for a program to develop the dashboards. As the LA City Ethics Commission furthered its goals of making its disclosures overall more accessible, however, the Commission integrated these staffing and resource costs into its overall budget.



IMPLEMENTATION TIPS

When developing a dashboard, it is important to balance the digestibility of the information with the importance of transparency. Specifically, the LA City Ethics Commission considers how to make the filings easy to understand without removing too much of the information. In addition, it is helpful to include external stakeholders in the release plans of the new tool. When the LA City Ethics Commission initially began converting from its older platform to its dashboard tools, journalists expressed concern that they may not be receiving the same information because the tools were so different. The commission explained their rationale for the new tool and clarified for the public that the tools provided the same information in a better way.

Montana Commissioner of Political Practices

The Montana Commissioner of Political Practices (COPP) included a dashboard in its Principal and Lobbyist Online Reporting System (lobbying app). The lobbying app is an online resource to report, disclose and view lobbying activity. The lobbying app functions on both desktop and mobile devices. Users can see on the dashboard aggregated data about lobbying activity across the state.

Principal and Lobbyist Online Reporting System » Sign in to get started.

Register for an account

The **Lobbyist** service is for you if you are:

- A Lobbyist wishing to make application for license (Form L-1).
- Note:** You must file with the Commissioner within five business days after entering into an oral or written agreement to receive payment(s) of \$2,650 or more; or after receiving payment(s) of \$2,650 or more for the purposes of lobbying the legislature.

LOGIN AS LOBBYIST

The **Principal's** service is for you if you are:

- A Principal who has made payment(s) or who has agreed to make payments of \$2,650 or more to an individual to lobby the legislature on your behalf and wish to authorize an individual to represent you (Form L-2), or
- A Principal who has made payment(s) or has agreed to make payment(s) to exceed \$2,650 to individuals to lobby the legislature on your behalf, but who has not paid any single individual an amount exceeding \$2,650 (Form L-3).
- A Principal who has registered with the Commissioner of Political Practices and who must file Lobbying Financial Reports (Form L-5).
- Click on the Principal button to file Form L-5 reports.

LOGIN AS PRINCIPAL AUTHORITY

Note:

Recent Activity → Registration Period: 2021 - 2022

Search Registry for Lobbyists and Principals

2021 - 2022

Search Lobbyists Search Principals View All Lobbyists View All Principals

Search Registry

Active Registrations

	Total	Sep 2021	Oct 2021	Change
Active Lobbyist Registrations	289			
Active Principal Registrations	305			
Total Active Registrations	594			
Total Fees Paid	\$49,350.00			

Last Reporting Period Statistics

New Lobbyist Registrations	1	0	1 ↓
Updated Lobbyist Registrations	2	3	1 ↑
New Principal Registrations	0	1	1 ↑
Updated Principal Registrations	2	0	2 ↓

Just Posted

Filing Schedule Lobbyist Registrations Principal Registrations

REPORT TYPE	DATE COVERED	DUE DATE
Initial	January 1 to 31 (session)	February 15th, 2021
Monthly*	February 1 to 28 (session)	March 15th
Monthly*	March 1 to 31 (session)	April 15th
Post Session	End of last report to end of session	30 days post adjourn
Session Year End	End of session to December 31st	February 15th, 2022
Post Special Session	End of session to end of special session	30 days post adjourn
Non Session Year End	January 1 to December 31st	February 15th, 2021

Summary of conversation with Jeff Mangan, Montana Commissioner of Political Practices:



REASONS FOR DEVELOPING DASHBOARD

Before the lobbying app, lobbyists and principals could only file their required disclosures by paper, and the general public could not easily access those disclosures because they were not readily available online. COPP decided to encourage and facilitate online disclosures by providing an app that lobbyists and principals felt was preferable to use over paper disclosures. COPP also wanted to make the disclosures easier for the general public to view and understand.



SUCCESS OF THE DASHBOARD

Everyone has the option to use the lobbying app on their phone or computer. The ease of access increases the likelihood that people will use it. COPP has received positive feedback from journalists and other members of the public who find the information easy to digest, as well as lobbyists and principals who find the app easy to use for reporting.



IMPLEMENTATION COSTS

Overall, the development was a six-month process. COPP hired a consultant to develop the app and invited stakeholders to test the app. Today, the app is easy to administer and does not add any additional staff resources to maintain, since the app is naturally set up for users to input their own information that the staff would be required to receive anyway.



IMPLEMENTATION TIPS

The user interface of an app is important for encouraging people to use the app. The public should not have to go through several layers of information to learn about government services. The information should be as available as possible in the most user-friendly manner, so that the public has confidence in the information being provided. COPP staff also try to interact with the system in the same manner that the public does, so that staff can more quickly identify possible problems with the system.

02

HEAT MAP OF ENFORCEMENT ACTIONS

What Is It?

A heat map of enforcement actions is an interactive map showing where, how many and what kind of enforcement actions take place in the ethics commission's jurisdiction. A heat map visualizes the enforcement work of the ethics commission, making the information and data both digestible and easily accessible.

Why It Matters

Ethics commissions face a challenge of making disclosure of enforcement activities transparent and meaningful. When ethics commissions disclose information about enforcement actions, it can provide the information in large sets of unnavigable data or in lists, which creates a barrier to access. Ethics commissions can address this challenge by ensuring the information is visually impactful and available for analysis of underlying data by using heat maps. The result is not only valuable time saved for the public and other stakeholders, but the assurance to the public that officials are being held accountable for violations.

Benefits



ENGAGEMENT

Attracts users to explore interactive features of the heat map to learn more about ethics compliance in their specific region



EDUCATION

Makes enforcement trends apparent that would otherwise be hidden in large data sets



ENFORCEMENT

Helps the commission hold public officials accountable by giving stakeholders, like members of local press outlets, simple access to information

California Fair Political Practices Commission

California's Fair Political Practices Commission (FPPC) uses a heat map showing how many enforcement actions occur in each jurisdiction within the state. The interactive map allows users to quickly see the enforcement landscape across the state and access details about the individual enforcement actions within a jurisdiction.



Summary of conversation with Richard C. Miadich, chair; Galena West, executive director; and Jay Wierenga, communications director:



REASONS FOR DEVELOPING THE HEAT MAP

Before developing the heat map, the FPPC provided non-user-friendly information about enforcement. As a part of an overhaul of the website, the FPPC wanted to take the information they were already collecting and present it in a more visually appealing way. The enforcement action data was easily transported into the heat map format, which made it easier to see and understand enforcement actions throughout the state of California.

One of the priorities for the FPPC was making visualization work for them and for those who consume the information, including the public, academics and members of the press. The heat map format won out over other types of visualization, like pie charts and graphs, because it was the most understandable: people in California know the look of the state and the orientation of themselves within it, so it would be easy to understand the data shown.



SUCCESS OF THE HEAT MAP

Public feedback on the heat map has included comments that the heat map is a convenient and interesting way to learn what is happening in their jurisdictions. Also, the heat map is considered fun, resulting in users engaging with other information on the website.

The map also helps the FPPC achieve two of the goals of the state's Political Reform Act: to make information transparent and hold public officials accountable. FPPC uses the heat map to spot enforcement trends and direct more educational resources to those jurisdictions as needed.



IMPLEMENTATION COSTS

The FPPC used several tools it already had at its disposal to create the heat map. They used existing internal staff to identify the information most transferable to an interactive graphic presentation. The heat map did not require many extra expenses because development was part of the process for upgrading the website.



IMPLEMENTATION TIPS

When designing a heat map, ethics commissions should include the information that the public seeks most often. Ethics commissions should also consider the perspective of all stakeholders who may use the heat map, including government officials and attorneys who represent them in enforcement proceedings. A commitment to full transparency from an ethics commission's leadership significantly helps with implementing a tool like a heat map.

According to the FPPC, one potential misinterpretation of the tool is that certain users may be tempted to use the heat map to compare jurisdictions against one another to make judgments about which counties are more compliant than other jurisdictions. But that use of the tool does not contemplate the size of the county or the number of public servants in the district, which would be critical information to have when comparing the relative amount of enforcement across jurisdictions. Rather, the heat map should be used on a periodic basis to see how enforcement trends look in a certain county in a certain election cycle.

03

EDUCATIONAL CONTENT FOR SOCIAL MEDIA

What Is It?

Educational content for social media includes videos or other media that provide anyone with access to learn the jurisdiction's relevant ethics requirements at any time. Specifically, educational content for social media helps stakeholders — including lobbyists, public officials and private parties engaged in political activity — understand ethics requirements applicable to their activities, including disclosure requirements.

Why It Matters

Ethics commissions are continually challenged to educate stakeholders on ethics requirements with limited time and resources for in-person training. On-demand educational content disseminated through social media expands outreach and thereby helps more stakeholders comply with relevant ethics requirements.

Benefits



ENGAGEMENT

Provides more accessibility for those who are unable to attend trainings in person



EDUCATION

Aids stakeholders in learning about ethics laws on their own time and at their own pace

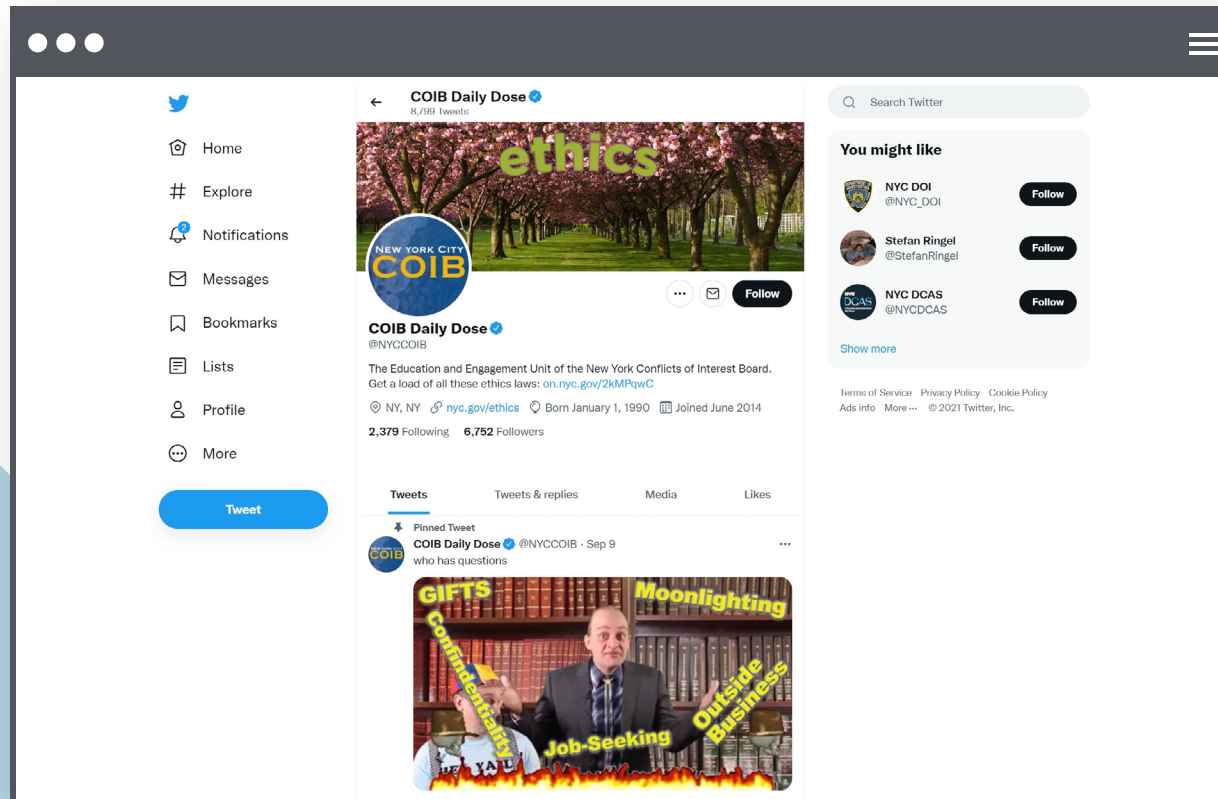


ENFORCEMENT

Supports compliance objectives of ethics commissions by preventing violations before they occur through education

New York City Conflicts of Interest Board

The New York City Conflicts of Interest Board (COIB) is a model commission for on-demand training videos that are both engaging and informative. Using humor to tackle topics such as “Miss Use of Position” and “The Conflict Zone,” the COIB’s Outreach Playlist provides government officials, employees and others subject to the COIB’s jurisdiction with accessible information about the commission’s rules and regulations. The COIB posts these videos on its social media platforms, including its popular Twitter account known as the “COIB Daily Dose.”



Summary of conversation with Carolyn Miller, executive director:



REASONS FOR DEVELOPING TRAINING VIDEOS

Prior to developing the videos, city employees who could not attend a training in person had limited opportunities for education on the relevant ethics requirements. The main audience for these videos is city government employees, who are subject to New York City's conflict of interest rules. The conflict of interest rules are long and do not naturally lend themselves to engaging content. As a result, the COIB decided to upgrade ethics training to reach more employees and provide them with a positive perspective on the COIB and ethics rules generally.



SUCCESS OF TRAINING VIDEOS

On-demand nature of the videos allows all city employees the opportunity to engage with the content regardless of scheduling conflicts. Also, the humorous nature of the content receives positive feedback from city employees and ethics professionals alike. Most importantly, the videos are informative, and viewers find the videos helpful to explain conflict of interest concepts. The content has generated goodwill from the public about the COIB, which the COIB believes makes stakeholders feel more comfortable contacting the COIB for advice. Because the videos are posted on the COIB Twitter account, the COIB can expand its reach with the broader public.



IMPLEMENTATION COSTS

In general, the videos require very little out-of-pocket expenses to produce. As the COIB describes on its YouTube page, the videos are produced entirely by COIB education and outreach staff with a green screen, video camera, and basic editing software. The COIB staff draft the scripts, serve as actors in the videos, and edit and publish the videos.

The primary costs of implementation are in recruiting and developing a creative staff with the ability and interest in creating the videos. The COIB even recruited staff with improv experience to assist with producing the videos. The COIB's education and outreach staff are specifically tasked with creating content for the public about the COIB's work, as a part of its mandate to provide training and advice.



IMPLEMENTATION TIPS

Ethics commissions should recognize that there is a fine line to maintain when developing creative content as a government entity, and there is no singular successful method. Producing videos requires thoughtfulness because creative content must balance the humor with the seriousness of the subject matter, while also considering the timeliness of the humor. Entities should screen all content before it is published and ensure that the legal content is not diminished by the humor. Undertaking this complex balancing act also comes with the risk that viewers do not understand — or worse, are offended by — the humor used. In those cases, the commission should not be shy in walking back any unintentional consequence and be receptive to the feedback received.

04

COMPLAINT PORTAL

What Is It?

A complaint portal is a method for the public to submit a complaint to an ethics commission online. A common goal for ethics commissions is to receive and address allegations of potential ethics violations. Complaint portals provide the public with a method of reporting ethics violations that helps to ensure that it includes necessary information. The online portal also enables ethics commission to improve case management.

Why It Matters

Complaints are difficult to file and time consuming, particularly for pro se members of the public. The public should not only know how to report a complaint but should be able to do so with relative ease. Simple online complaint submissions allow the public to eliminate redundant steps, which reduce the likelihood that a layman will be able to file a complaint. Likewise, simple complaint forms increase the likelihood that more members of the public — specifically, those members of the public who do not regularly engage with government ethics — will report potential violations.

Benefits



ENGAGEMENT

Provides accessibility to members of the public who do not know how to make formal complaints



EDUCATION

Allows the public to understand the commission's jurisdiction and relevant ethics laws

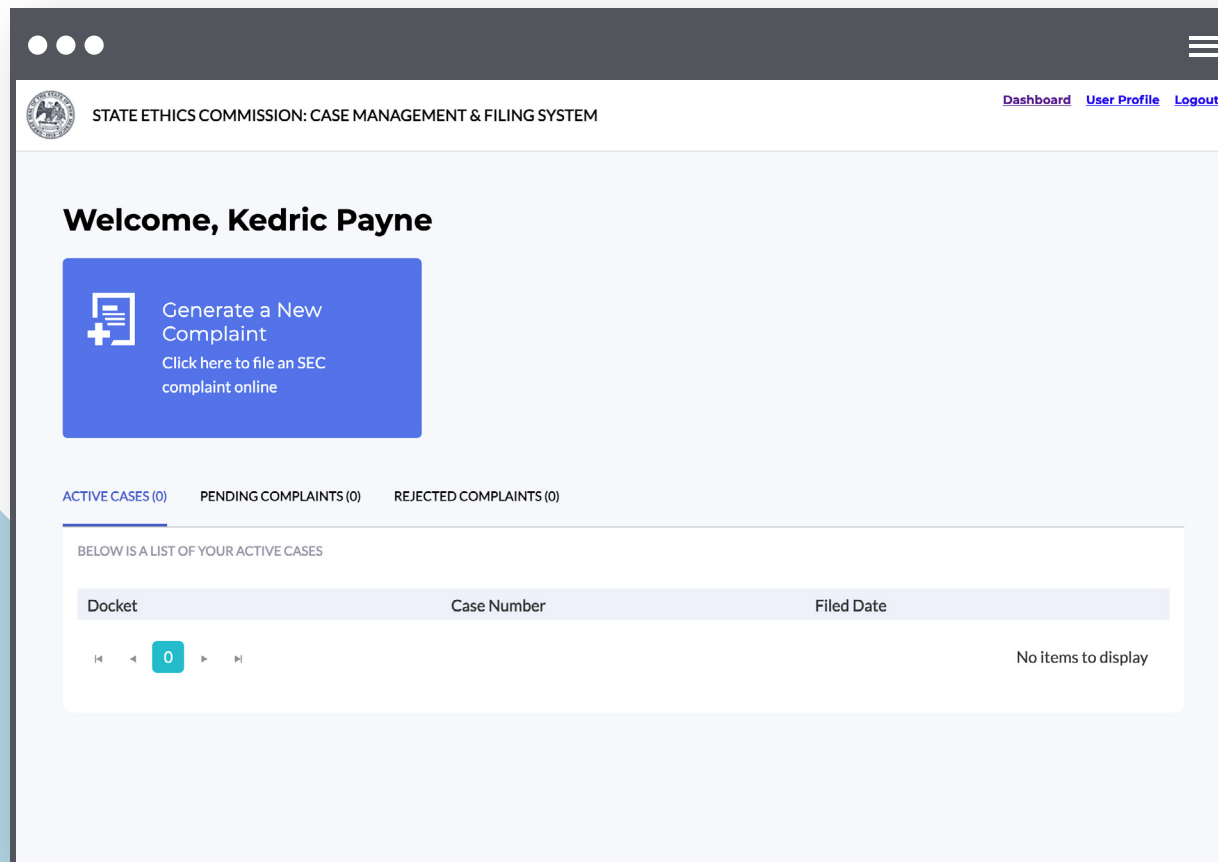


ENFORCEMENT

Enables the public to report violations easier, which can increase enforcement

New Mexico State Ethics Commission

The New Mexico State Ethics Commission (NMSEC) developed a complaint portal, known as the Proceedings Portal, where anyone can bring a formal complaint using an easy, visually accessible tool. The Proceedings Portal is the hub for all online complaint filing, and it functions similarly to that of an online case management system typically used by state and federal courts. Both lawyers and pro se members of the public alike feel comfortable filing a formal complaint because of the prioritization on user-friendliness.



Summary of conversation with Jeremy Farris, executive director:



REASONS FOR DEVELOPING ONLINE COMPLAINT PORTAL

Before the Proceedings Portal, complaints were handled over email and a basic file management system. Now, the Proceedings Portal acts as a case management system, where members of the public can file a complaint and view its progress, and the NMSEC can enter text orders related to the case and manage filings from the parties — all in the same location.



SUCCESS OF THE ONLINE COMPLAINT PORTAL

The Proceedings Portal makes the commission more visible to legal advocates and state officials, who now have an easier method to facilitate complaints to the commission. The NMSEC received feedback from pro se complainants, for example, who have successfully interacted with the system.

Internally, the Proceedings Portal aids the NMSEC in complying with its own regulations, as well as furthering the goals of the commission. The Proceedings Portal helps the NMSEC in complying with and operationalizing its rules of procedure for processing complaints. For example, the NMSEC can more easily comply with its obligations to respond to complaints and to make public complaints at the appropriate stage. The NMSEC can also quickly sift through complaints for which they have no jurisdiction and respond accordingly.



IMPLEMENTATION COSTS

The cost of the Proceedings Portal is concentrated in the initial development of the software. The cost of developing the tool was relatively low because NMSEC worked with a New Mexico-based vendor to develop a unique tool for the commission. The costs to administer the tool are limited to the same staff time that NMSEC already devotes to handling complaints. Indeed, it takes less staff time to process complaints with the Proceedings Portal, which lowers overall cost.



IMPLEMENTATION TIPS

No matter how user-friendly the system is, users will always need help navigating the system. Therefore, commissions should dedicate staff time to interfacing with the public whenever they have questions about using the complaint system.

When designing any advanced tool to promote a commission's goals, the commission should do the best they can to design their platform from scratch, rather than purchasing off-the-shelf software. Every commission's governing rules and regulations, as well as goals, are different. Any platform developed should be tailored to the particular need of the commission.

Nevada Commission on Ethics

The Nevada Commission on Ethics (NCOE) developed an online complaint form to accompany the case management system that processes complaints. The online complaint form allows the user to easily submit a complaint to the NCOE, and it even includes links to the relevant laws and regulations to aid the user in filing a complaint.

ETHICS COMPLAINT FORM
NRS 281A.700 to 281A.790

Public Officer or Employee Information | NRS Violations | Allegation Detail | Pending Matters | Witnesses | Evidence | Your Information

Provide the following information for the public officer or employee you allege violated the Nevada Ethics in Government Law, NRS Chapter 281A.
(If you allege that more than one public officer or employee has violated the law, use a separate form for each individual.)

Entity Type * City County State

Public Entity *

Public Office Title *

Last Name *

First Name *

Street

City *

State * NV

Zip *

Phone Work

Phone Other

Email

Next

Summary of conversation with Tracy L. Chase, commission counsel:



REASONS FOR DEVELOPING COMPLAINT PORTAL

Before the development of the portal, complaint filing was onerous for both the filer and the commission, for several reasons. Complaints could only be submitted by PDFs. The NCOE has jurisdiction over 145,000 public employees and receives thousands of complaints a year. A single complaint can be 1,000 pages long. The commission is composed of a staff of six people. And the NCOE has a statutory requirement to respond to a complaint within a specified time period. As a result, the NCOE developed an online complaint submission process out of necessity to manage all of the complaints it receives with the limited resources that it has, in keeping with its obligations under Nevada law.



SUCCESS OF THE COMPLAINT PORTAL

The vast majority of complaints come online now, so the NCOE is able to comply with its deadlines with relative ease. The system works in tandem with NCOE's internal case management system. The complaint automatically receives a case number upon submission, and because staff do not have to manage volumes of paperwork, they can effortlessly begin processing the case. This has been particularly helpful during the pandemic as staff work remotely. For the public, the online complaint form is naturally easier to use, especially because NCOE includes information about the relevant ethics laws for their complaint.



IMPLEMENTATION COSTS

The NCOE includes the cost of developing an online complaint system into its budget. The commission does not incur any additional costs to administer the system because the nature of filing an online complaint actually reduces the amount of time needed to process complaints.



IMPLEMENTATION TIPS

Finding the right consultant to build a system may take time and research. Prioritize finding someone who works well with one's internal IT staff. Also, research available products to determine the budgeting considerations. Ultimately, it may take many conversations with multiple consultants before finding the right one.

05

SEARCHABLE, SORTABLE AND DOWNLOADABLE PUBLIC DISCLOSURES

What Is It?

A searchable, sortable and downloadable public disclosure is a format for public disclosures that simplifies the public's review of the information. This format enables the public to find information with ease, similar to an internet search engine. The tool also supports the creation of software applications tailored to the user's research interests.

Why It Matters

A common concern for the public and government officials reviewing public disclosures is that the records contain large amounts of data that cannot be reviewed efficiently by reading each entry. When the information is not presented coherently, it is not transparent to members of the public. A response to this challenge is converting the public records into a format that allows word searches and tailored filtering of data into categories that are relevant for the user. This gives the public the information they need and allows full access to the information.

Benefits



ENGAGEMENT

Provides users with a simple way to research and review public records



EDUCATION

Reduces the time ethics commissions spend answering questions from requestors about data that is inaccessible or difficult to find



ENFORCEMENT

Enables the public and ethics commission staff to identify potential violations through searches or the creation of software applications

San Francisco Ethics Commission

The San Francisco Ethics Commission (SFEC) not only makes their data easily accessible on the website, but it also makes all disclosures collected by the commission searchable, sortable and downloadable.

City & County of San Francisco
Ethics Commission

Search for E-Filed Transaction Data

Search Text

Department Name

Year of Period End Date

Schedule A-1

Schedule A-2

Schedule B

Schedule C

Schedule D

Schedule E

Comments

<< < 1 2 3 4 5 6 7 8 9 10 ... > >> Go To Page:

[Schedule A-1](#) - Investments - Stocks, Bonds, and Other Interests (Ownership Interest is Less than 10%)

Filer Name:	Chu, Carmen
Department, Position:	Assessor-Recorder, Assessor-Recorder

Summary of conversation with LeeAnn Pelham, executive director:



REASONS FOR DEVELOPING DATA DISCLOSURES TOOL

Before online public disclosure, certain information was in hard copies or otherwise not easily accessible by the public. The SFEC believes that disclosure should be accessible, meaningful and useful. Meaningful public disclosure is not achieved by giving the public discrete sets of data or papers in a file cabinet. One purpose of updating their disclosure system was to provide the public with access to data in a way that made it possible to connect the dots and make sense of campaign disclosures, lobbying data and economic interest data. Searchable, sortable and downloadable disclosures help provide the fundamental transparency, which keeps government accountable. The disclosures also promote public trust by showing the public that the laws requiring public disclosure are working for their benefit.



SUCCESS OF THE DATA DISCLOSURES TOOL

Data that is connected is more useful than data on its own. The accessibility of campaign finance data has allowed auditors and campaigns to better comply with the law. The public has also received more informed journalism about City Hall.



IMPLEMENTATION COSTS

The SFEC increased its staff to accommodate electronic disclosure and data analysis. Ultimately SFEC found that developing processes internally is not only less expensive, but it allows the technology to be tailored to the ethics commission's vision.



IMPLEMENTATION TIPS

If the public is using the data well, the commission is incentivized to use the data to achieve its compliance goals. The success of a transparency tool requires educating potential users. An innovative tool that no one knows or understands how to use will not benefit as many people. Start with small steps and then scale up, which may mean exhausting all in-house tools to develop a database. Additionally, it is important for digestibility to be a priority, which requires a balance between the depth of the data and the ability to consume and analyze the data.

06

ADVANCED SEARCH OF ADVISORY OPINIONS

What Is It?

Advanced search of advisory opinions is a tool that allows the user to browse advisory opinions based on several criteria. This can include the name, date, relevant subject, relevant rule citation and keyword searches within the database.

Why It Matters

While ethics commissions endeavor to advise government officials and the public of how the law applies in specific cases, the commission may strain its resources by repeatedly giving advice about the same topic. Ethics commissions are confronting this challenge by making their formal advice easily searchable on the commissions' websites. Advanced search functions enable the public to find relevant advisory opinions without excessive time or effort, which makes the advice more useful.

Benefits



ENGAGEMENT

Increases the ability of the public to access advisory opinions



EDUCATION

Allows stakeholders to access advisory opinions based on the topic that they are seeking and learn more how the law is applied in practice



ENFORCEMENT

Provides a mechanism for commissions to comply with requirements to publish formal advisory opinions, and prevent violations through education

New Mexico State Ethics Commission

The New Mexico State Ethics Commission (NMSEC) partners with the New Mexico Compilation Commission to publish all advisory opinions on NMOneSource, the state government's online database of all published legal opinions and state laws and regulations. This function allows members of the public to search advisory opinions online as they would search any other state legal document. Specifically, viewers can search published advisory opinions by name of the parties, publication date and even subject matter. Moreover, the advisory opinions are connected to relevant legal opinions and state law on the website, so viewers can see how advisory opinions affect relevant law.

The screenshot shows the 'Advanced Search' page on NMOneSource.com. The page header includes the NMOneSource.com logo and the New Mexico Compilation Commission logo. Below the header are navigation links for Home, Scope of Coverage, and Contact Us. The main content area features a search form with the following fields:

- ALL DATABASES** (selected), NEW MEXICO APPELLATE REPORTS™, NEW MEXICO LAWS AND COURT RULES
- Full text search
- Case Name, Official Citation, NM Report Citation, Parallel Citations, Docket Numbers, Title, File Number, Anchor
- Noteup: Official Citation, NM Report Citation, Parallel Citations, Docket Numbers, File Number
- Date (YYYY or MM/DD/YYYY) and (YYYY or MM/DD/YYYY)

At the bottom of the search form are buttons for **RESET** and **SEARCH**.

Summary of conversation with Jeremy Farris, executive director:



REASONS FOR DEVELOPING ADVISORY OPINIONS DATABASE

In the past, the NMSEC published advisory opinions on its website. The NMSEC decided to formalize the advisory opinions it published, while making the advisory opinions easier to view by the public. Now lawyers and non-lawyers alike can perform simple searches and better understand advisory opinions because the advisory opinions are more accessible.



SUCCESS OF DEVELOPING ADVISORY OPINIONS DATABASE

Advisory opinions are maintained with other state legal opinions, reinforcing the significance of the ethics opinions as serious legal authority. Publishing the advisory opinions on NMOneSource brings the advisory opinions to the people's source of legal information — advisory opinions are overall more accessible, and more available to the public. Legal advocates in particular have commented positively on the ease of access. In turn, government officials and others who are subject to the ethics laws are better informed on whether certain nuanced activity complies with the commission's interpretation of ethics laws and rules.



IMPLEMENTATION COSTS

The cost is limited to the regular overhead associated with the drafting and publication of advisory opinions because NMSEC works with a state agency to upload the advisory opinions.



IMPLEMENTATION TIPS

Even if an ethics commission does not have a public database like NMOneSource, an ethics commission can take steps to make advisory opinions accessible. For example, before NMSEC moved the advisory opinions to NMOpenSource, NMSEC maintained the opinions on their websites. They were displayed prominently on the homepage and included the name of the opinion, the date of publication and — importantly — a brief summary of each opinion for the public. Even small changes such as those increase the visibility of advisory opinions so that the public can access the opinions for which they are searching.

07

ONLINE ETHICS ADVICE

What Is It?

Online ethics advice enables public officials and employees to request and receive confidential, written guidance from ethics commissions quickly. This advice includes a legal analysis of how a relevant law applies to the specific factual circumstance of the official.

Why It Matters

A consistent challenge with ethics compliance is that public officials and employees may not understand or may misinterpret how general ethics advice or an advisory opinion applies in a specific situation. Although an ethics commission may provide tailored advice over the telephone, public officials and employees may need or prefer to rely on written advice. Online ethics advice provides an efficient method of issuing confidential, written ethics advice using precise fill-in forms that gather the most relevant information needed for tailored advice.

Benefits



ENGAGEMENT

Encourages public officials and employees to request confidential advice because of the simple process and user-friendly format of the submission



EDUCATION

Informs public officials and employees of nuance of ethics rules that may not be included in general guides, brochures or videos available on the ethics commission website



ENFORCEMENT

Provides clear record of the advice a public official received, which should either establish compliance or noncompliance

Nevada Commission on Ethics

The Nevada Commission on Ethics (NCOE) created an online ethics advice feature where public officials and employees can request ethics advice and advisory opinions. The requester completes a short online form with information about their position, the relevant provision of the ethics laws and the facts.

The screenshot shows a web browser window displaying the "REQUEST FOR AN ADVISORY OPINION" form. The form is titled "REQUEST FOR AN ADVISORY OPINION" and includes the reference "NRS 281A.070 to 281A.690" and a "(CONFIDENTIAL)" warning. The form is divided into four tabs: "Your Information", "Questions", "NRS", and "Details". The "Your Information" tab is active, showing a series of input fields for personal and professional details. The fields are: Last Name *, First Name *, Public Office Title *, Public Entity *, Date Appointed or Elected (Current Term) (with a calendar icon), Term of Office (# Years), Street *, City *, State * (with a dropdown menu showing "NV"), Zip *, Phone Day *, Phone Evening *, and Email *. A "Next" button is located at the bottom of the form.

REQUEST FOR AN ADVISORY OPINION
NRS 281A.070 to 281A.690
(CONFIDENTIAL)

Your Information Questions NRS Details

Last Name *
First Name *
Public Office Title *
Public Entity *
Date Appointed or Elected (Current Term)
Term of Office (# Years)
Street *
City *
State * NV
Zip *
Phone Day *
Phone Evening *
Email *

Next

Summary of conversation with Tracy Chase, executive director:



REASONS FOR DEVELOPING ONLINE ETHICS ADVICE

Prior to developing the online ethics advice tool, the NCOE's website included complaints and advisory opinions that were not easily accessible or searchable. The NCOE decided to make comprehensive improvements to the website that included an improved way to file and search complaints online and a better way to request advice and search advisory opinions online.



SUCCESS OF ONLINE ETHICS ADVICE

The online ethics advice tool helps NCOE respond to the demand for advisory opinions, which is partly due to a safe harbor provision for public officials who may violate the law in reliance on ethics advice. Public officials have provided positive feedback on the online ethics advice tool. The advisory opinions are helpful for promoting compliance and avoiding violations.



IMPLEMENTATION COSTS

The NCOE used the services of a Nevada-based contractor to develop a custom website that included the database. The cost of implementation was reasonable, and they used a local outside consultant. The commission included the costs in its annual budget.



IMPLEMENTATION TIPS

Finding the right consultant to build the NCOE's customized tools took time and research. The determining factor was finding someone who could work well with their internal IT staff. To address budgeting considerations, the NCOE researched available products that would not require developing new software. The NCOE had many conversations with multiple consultants before finding the right one. If a product that a consultant offers is too expensive, you can always try to reduce the cost by reducing the functionality of the product.

08

PUBLIC HEARING VIRTUAL ATTENDANCE

What Is It?

Public hearing virtual attendance is the use of technology to ensure public meetings are accessible to all without requiring attendance in person. Virtual attendance at public meetings allows the public to see and participate in ethics commission activity regardless of when and where the physical meeting occurs.

Why It Matters

Often, public meetings are difficult to attend for those who have scheduling conflicts, lack transportation or have other barriers to meeting in person. Opening public meetings to those who cannot attend in person allows more participation. As a result, government decision making is more transparent, which builds public trust in government.

Benefits



ENGAGEMENT

Allows individuals with limited mobility or availability to attend meetings without leaving their homes



EDUCATION

Provides the public with easy access to information about the commission



ENFORCEMENT

Holds the ethics commission accountable to more of the public who participate and question commission actions

San Francisco Ethics Commission

The San Francisco Ethics Commission (SFEC) recently implemented virtual public meetings. The public can attend and participate in all public meetings virtually, enabling people to attend who otherwise could not.

The screenshot displays a virtual meeting interface for the San Francisco Ethics Commission. At the top, there's a header with 'SFGov tv' and 'City & County of San Francisco'. Below this is a video grid showing several participants in a virtual meeting. A navigation bar at the bottom of the video grid includes 'Index', 'Share', 'Download', and 'Embed' options. To the right of the video grid is a sidebar with a menu icon and a list of agenda items for 'FRIDAY, OCTOBER 08, 2021'. The agenda items include:

- 1. Call to order and roll call
- 2. [Public comment on matters appearing or not appearing on the agenda](#)
- CONSENT CALENDAR
- 3. [Draft Minutes of the Commission's August 13, 2021 regular meeting](#)
- REGULAR CALENDAR
- 4. [Proposed Streamlined Stipulation, Decision and Order In the Matter of Sandra Lee Fewer for Supervisor 2016, Sandra Lee Fewer and Nicholas Persky \(SFEC Complaint No. 1617-020-2\)](#)
- 5. [Proposed Streamlined Stipulation, Decision and Order In the Matter of Brigitte Davila \(SFEC Complaint No. 1819-034/035 and 2122-012\)](#)
- 6. [Proposed Streamlined Stipulation, Decision and Order In the Matter of Jennifer Stojkovic \(SFEC Complaint No. 1920-011\)](#)
- 7. [Proposed Streamlined Stipulation, Decision and Order In the Matter of No Plan, No Accountability, No on Prop C, Sponsored by the San Francisco Chamber of Commerce and Andrew Sinn \(SFEC Complaint No. 2021-042\) Other Regular Items](#)
- 8. [Presentation by Controller's Office on its preliminary assessment report](#)
- 9. [Presentation, discussion and possible action on findings and staff recommendations of "Report on Gifts: Gifts to City Departments," dated September 29, 2021](#)
- 10. [Presentation and discussion of Staff report on Enforcement Process and Consideration of Proposed Stipulated Orders During Public Session](#)
- 11. [Discussion and possible action on Ethics Commission Racial Equity Action Plan](#)
- 12. [Discussion and possible action on Resolution on Continuation of Remote Commission Meetings](#)
- 13. [Discussion of Executive Director's Report](#)
- 14. [Discussion and possible action on items for future meetings](#)
- 15. [Public Comment](#)
- 15. Adjournment

Summary of conversation with LeeAnn Pelham, executive director:



REASONS FOR DEVELOPING VIRTUAL PUBLIC MEETINGS

Prior to implementing virtual public meetings, commissioners and members of the public would have to appear at the meetings in person to engage with the SFEC. The COVID-19 pandemic made virtual attendance a necessity for carrying out the mission of the ethics commission. The virtual meetings were a way to leverage technology in the environment to bring information to the public when the public is unable to physically go to the SFEC meetings. Virtual meetings allowed the public to remain engaged with the commission during unprecedented times while acknowledging the realities and harnessing the benefits of a hybrid world.



SUCCESS OF VIRTUAL PUBLIC MEETING

The virtual option for meetings provides greater visibility into the inner workings of the ethics commission and has allowed people to plug into deliberations in real time. The use of technology has not changed the quality, scope or regularity of interaction. Virtual meetings have shown the public that the SFEC is visible and remains accountable, even if the interaction with the public is virtual.



IMPLEMENTATION COSTS

The ethics commission was able to use a third-party video conferencing system, which resulted in minimal implementation costs.



IMPLEMENTATION TIPS

Ethics commissions can leverage technology to provide information that is usable and relevant to the public. When implementing changes, it is critical for ethics commissions to understand how the public thinks and then give them what they need. Regardless of resources, all commissions can take small steps to make the commission's work as accessible as possible in a practical way.

09

E-NEWSLETTERS AND WEBINARS

What Is It?

E-newsletters are virtual letters sent to the public, informing them of the ethics commission's activities. Webinars are virtual seminars that educate stakeholders, including government officials and the public, about issues under the ethics commission's purview. Both are tools to educate government officials and other stakeholders, including lobbyists, the public and government contractors, about applicable ethics requirements.

Why It Matters

Ethics commissions may have difficulty engaging and educating government officials, employees and the public who are unable to meet in person. Webinars and newsletters ensure accessibility regardless of the time and place of in-person trainings, and therefore aid in education and compliance efforts. Webinars and newsletters increase accessibility and make the work of the ethics commission more inclusive.

Benefits



ENGAGEMENT

Allows the ethics commission to engage creatively and meaningfully with stakeholders



EDUCATION

Disseminates educational materials to a broader audience than traditional in-person meetings and seminars

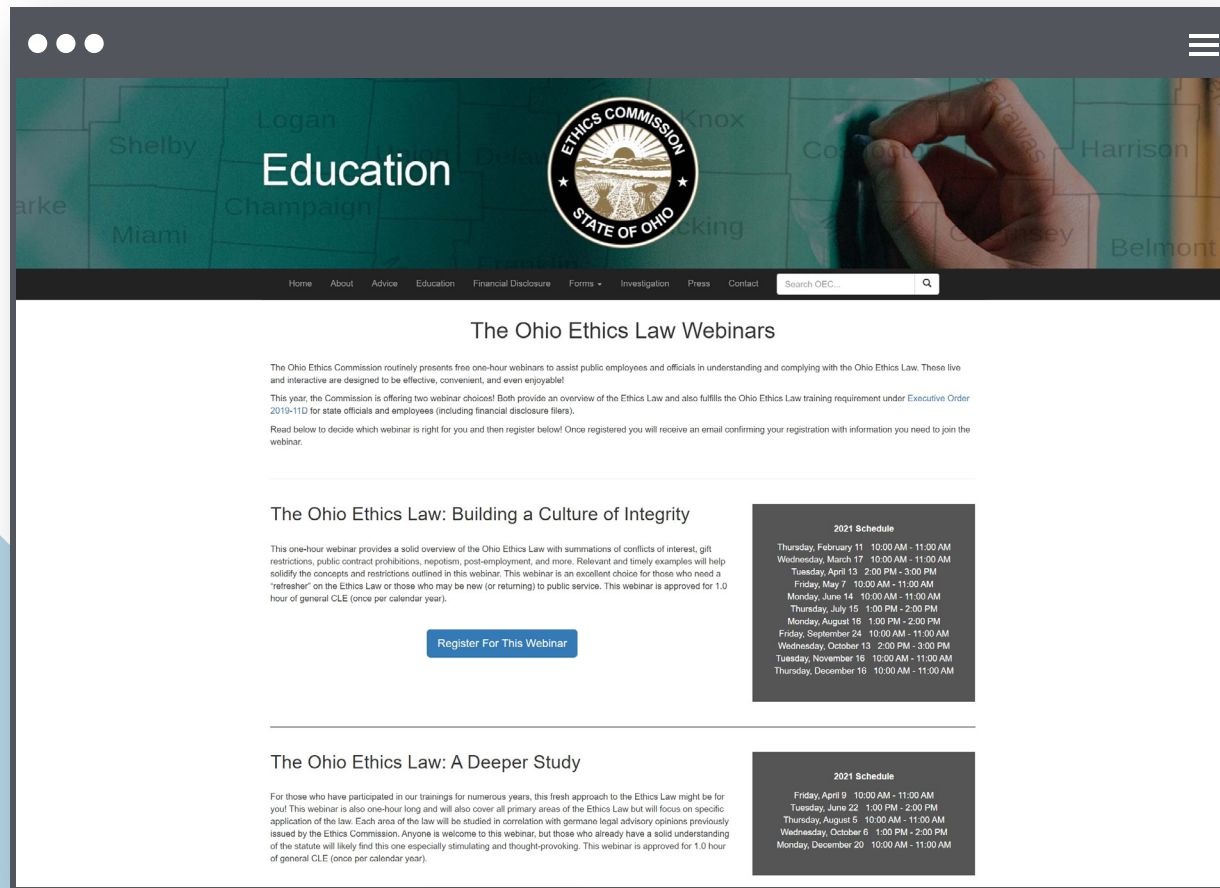


ENFORCEMENT

Supports the use of education to inform more stakeholders of ethics requirements and avoid noncompliance

Ohio Ethics Commission

The Ohio Ethics Commission provides stakeholders with the opportunity to attend online webinars on ethics issues, including “Building a Culture of Integrity” and how Ohio’s ethics laws work.



Summary of conversation with Paul Nick, executive director:



REASONS FOR DEVELOPING E-NEWSLETTERS AND WEBINARS

Initially, the Ohio Ethics Commission's newsletters were mailed and the seminars were only in person. To promote compliance with ethics laws, the Ohio Ethics Commission wanted to expand their outreach to people who are subject to ethics laws throughout the state without forcing them to travel to an in-person ethics meeting. The Ohio Ethics Commission also wanted to engage stakeholders in a less pedantic way than traditional educational seminars. These tools make the work of the ethics commission inclusive and accessible to more people. Importantly, the audience for these materials extends beyond public officials to those who seek to do business with and interact with public officials, including trade associations and investment advisers for retirement systems. The newsletters and webinars give all stakeholders with varying familiarity with ethics requirements the essential compliance information.



SUCCESS OF E-NEWSLETTERS AND WEBINARS

Stakeholders have appreciated the informative and entertaining nature of the webinars. The format has increased public engagement, and the webinars help in compliance. In addition, the Ohio Ethics Commission often requires violators to attend webinars as part of settlement agreements. Finally, webinars are used as teaching aids at law schools and for compliance attorneys.



IMPLEMENTATION COSTS

The commission partnered with another organization that assisted with in-house webinar production, but otherwise it self-produced everything. Outside consultant costs were minimal. The Ohio Ethics Commission hired an internal staff person with experience producing commercials, which significantly improved the quality of the videos.



IMPLEMENTATION TIPS

Most people want to comply with the ethics law, and it is important to provide them with the tools necessary to understand the law. Therefore, the mission of an ethics commission relies on a web presence that allows users to access and digest information. Although focusing on enforcement is tempting due to the lure of statistics and overall impact, prioritizing and modernizing compliance tools are also impactful. Giving people who want to comply with the law the opportunity is time and money well spent.

10

CITIZEN-MINDED HOMEPAGE

What Is It?

A citizen-minded homepage is a central landing page for the ethics commission that provides accessible links to all the public information collected by the ethics commission. The public should be able to easily find the information they are searching for with minimal effort, making the information convenient to access. A simplified homepage may include conspicuous links to lobbying, campaign and financial disclosure reports, advisory opinions, a complaint portal and database of enforcement actions.

Why It Matters

Ethics commissions collect extensive data and face a challenge in presenting that data in a digestible, accessible and easily navigable way. Moreover, not all members of the public are tech-savvy and able to navigate complicated web designs to find information. Ethics commissions are addressing this challenge by making their homepages more user-friendly and navigable.

Benefits



ENGAGEMENT

Encourages the public to use the website to find the information they need

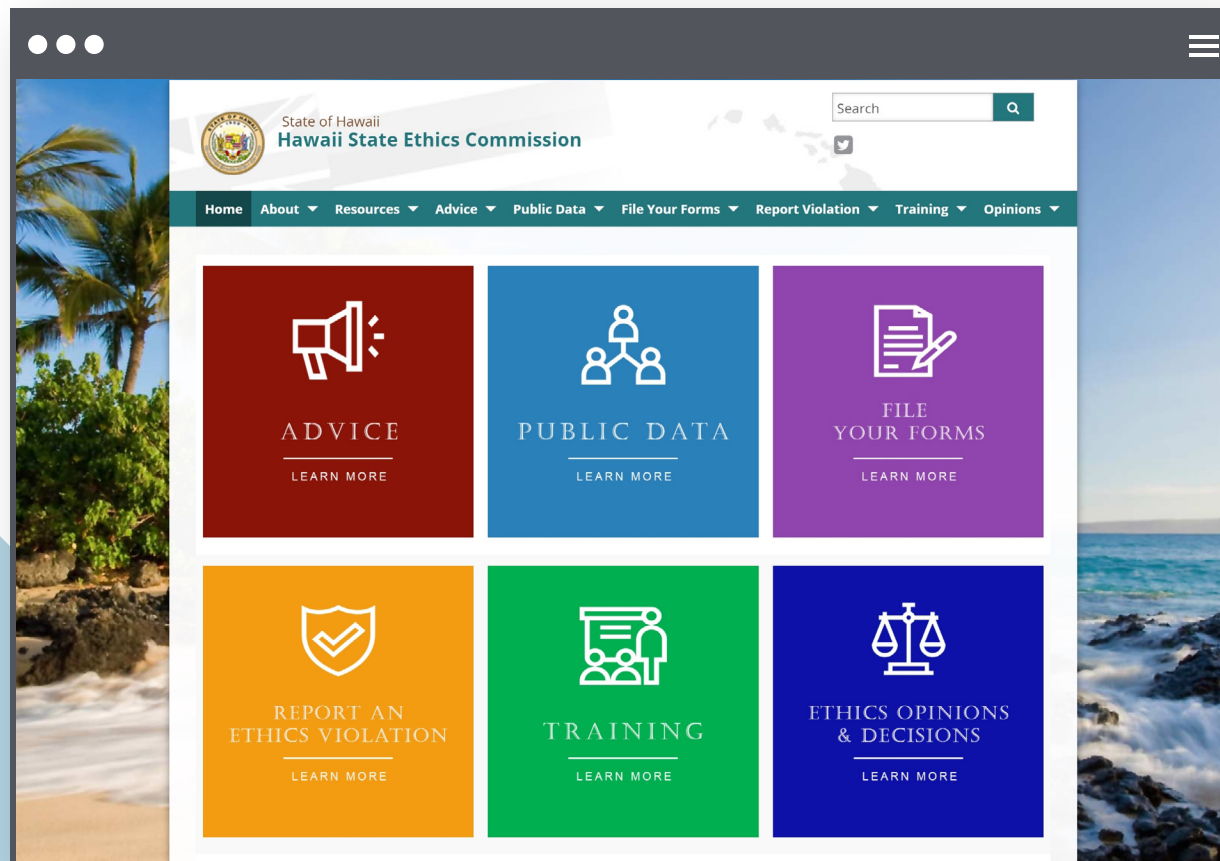


EDUCATION

Empowers the public to search for and engage with the information themselves

Hawaii State Ethics Commission

The Hawaii State Ethics Commission (Hawaii Ethics Commission) is a model for an easily navigable homepage. The homepage uses color coordination and graphics to efficiently point the public to information they are looking for and includes links to more data when the user hovers over the graphics. The homepage also includes a navigation bar for more traditional browsing as well as a virtual digest of “What’s new” and filing deadlines.



Summary of conversation with Dan Gluck, executive director and general counsel, and Susan Yoza, associate director:



REASONS FOR DEVELOPING SIMPLIFIED HOMEPAGE

All the information collected by the Hawaii Ethics Commission was already available on the website, but the layout of the website made it hard for the public to actually engage — and want to engage — with that information. In the past, the staff spent excessive time directing the public or media to the right part of the website. The Hawaii Ethics Commission wanted to make it as easy as possible for stakeholders to find information. The goal was to put the work of the commission front and center. Because of the geographic spread of its residents, the Hawaii Ethics Commission wanted everyone to be able to easily access the information digitally.



SUCCESS OF THE SIMPLIFIED HOMEPAGE

As a result of the navigability of the homepage, Hawaii Ethics Commission staff have been able to engage with the public more about the substantive work of the commission and less about how to navigate the website. The Hawaii Ethics Commission receives fewer questions looking for information because users are able to locate answers to their questions on the website. In addition, the Hawaii Ethics Commission has found it easier to direct callers to the correct information online by using the color-coded homepage to explain the location clearly.



IMPLEMENTATION COSTS

The primary implementation costs centered around internal staff time. The Hawaii Ethics Commission has an in-house computer specialist who manages the entire disclosure system and makes sure it works properly. The computer specialist used a website building tool that was already available to build the website. The Hawaii Ethics Commission also coordinated with the state IT department to host the website. Implementation did not require an outside consultant.



IMPLEMENTATION TIPS

Ethics commissions should always try to improve the services they offer to the public and work toward promoting integrity in government. Even small improvements move the mission forward. It is also important to always consider the Americans with Disabilities Act when implementing new transparency measures.

Top 10 Tools Chart

Tool	Benefits			Cost	Examples
	ENGAGEMENT	EDUCATION	ENFORCEMENT		
1. Dashboard of Public Disclosures	Attracts the public and officials to use and explore public records	Digests dense data while informing users of the scope of available public records and the underlying disclosure requirements	Exposes potential violations to the public and ethics commission staff	Moderate	LA City Ethics Commission > Montana Ethics Commission >
2. Heat Map of Enforcement Actions	Attracts users to explore interactive features of the heat map to learn more about ethics compliance in their specific region	Makes enforcement trends apparent that would otherwise be hidden in large data sets	Helps the commission hold public officials accountable by giving stakeholders, like members of local press outlets, simple access to information	Low	California Fair Political Practices Commission >
3. Educational Content for Social Media	Provides more accessibility for those who are unable to attend trainings in person	Aids stakeholders in learning about ethics laws on their own time and at their own pace	Supports compliance objectives of ethics commissions by preventing violations before they occur through education	Low	New York City Conflicts of Interest Board >
4. Complaint Portal	Provides accessibility to members of the public who do not know how to make formal complaints	Allows the public to understand the commission's jurisdiction and relevant ethics laws	Enables the public to report violations easier, which can increase enforcement	Low	New Mexico State Ethics Commission > Nevada Commission on Ethics >
5. Searchable, Sortable and Downloadable Public Disclosures	Provides users with a simple way to research and review public records	Reduces the time ethics commissions spend answering questions from requestors about data that is inaccessible or difficult to find	Enables the public and ethics commission staff to identify potential violations through searches or the creation of software applications	Low-Moderate	San Francisco Ethics Commission >

CONTINUED ON NEXT PAGE

Top 10 Tools Chart

Tool	Benefits			Cost	Examples
	ENGAGEMENT	EDUCATION	ENFORCEMENT		
6. Advanced Search of Advisory Opinions	Increases the ability of the public to access advisory opinions	Allows stakeholders to access advisory opinions based on the topic that they are seeking and learn more how the law is applied in practice	Provides a mechanism for commissions to comply with requirements to publish formal advisory opinions, and prevent violations through education	Low	New Mexico State Ethics Commission ▶
7. Online Ethics Advice	Encourages public officials and employees to request confidential advice because of the simple process and user-friendly format of the submission	Informs public officials and employees of nuance of ethics rules that may not be included in general guides, brochures or videos available on the ethics commission website	Provides clear record of the advice a public official received, which should either establish compliance or noncompliance	Moderate	Nevada Commission on Ethics ▶
8. Public Hearing Virtual Attendance	Allows individuals with limited mobility or availability to attend meetings without leaving their homes	Provides the public with easy access to information about the commission	Holds the ethics commission accountable to more of the public who participate and question commission actions	Low	San Francisco Ethics Commission ▶
9. E-Newsletters and Webinars for Public	Allows the ethics commission to engage creatively and meaningfully with stakeholders	Disseminates educational materials to a broader audience than traditional in-person meetings and seminars	Supports the use of education to inform more stakeholders of ethics requirements and avoid noncompliance	Low-Moderate	Ohio Ethics Commission ▶
10. Citizen-Minded Homepage	Encourages the public to use the website to find the information they need	Empowers the public to search for and engage with the information themselves		Low	Hawaii State Ethics Commission ▶



About Campaign Legal Center

The nonpartisan Campaign Legal Center advances democracy through law at the federal, state and local levels, fighting for every American's rights to responsive government and a fair opportunity to participate in and affect the democratic process.

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