

**ETHICS COMMISSION
CITY AND COUNTY OF HONOLULU**

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KIRK CALDWELL
MAYOR



JAN K. YAMANE
EXECUTIVE DIRECTOR
AND LEGAL COUNSEL

September 23, 2019

Ladies and Gentlemen:

The Honolulu Ethics Commission is pleased to present its strategic plan:

Honolulu Ethics Commission – 2027

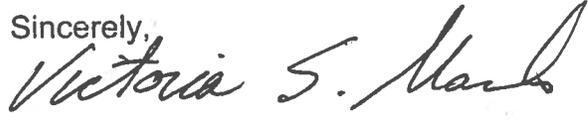
This is the Commission's first such plan and the culmination of three years of public meeting discussions, development and drafting, and outreach to stakeholders. We wish to express our appreciation and mahalo to stakeholders who reviewed and commented on draft plans. Your involvement greatly enhanced our product.

This plan sets forth a blueprint for the future and will be revisited in 2020 (year three), 2022 (year five) and 2024 (year seven). As a springboard to the future, it is the Commission's jumping-off point to a vibrant, relevant, and robust ethics program for officers and employees of the City & County of Honolulu. Although formally adopted at the March 2018 Ethics Commission meeting, the Commission has already amended the plan and intends for it to be a work in progress, a flexible and directional touchstone for Commissioners and staff.

We look forward to the challenge of building and sustaining the City's ethics program as we strive to fulfill our mission statement:

To ensure that elected officials, appointed officers and employees demonstrate the highest standards of ethical conduct so that the public may have trust and confidence in the integrity of government.

"We hold the public's trust."

Sincerely,

Victoria S. Marks
Chair
Honolulu Ethics Commission

cc: All City Departments and Agencies
Honolulu City Council
Hawaii State Ethics Commission
Board of Ethics – County of Hawaii
Board of Ethics – County of Maui
Board of Ethics – Count of Kauai
Hawaii Fire Fighters Association
Hawaii Government Employees Association, AFSCME, Local 152, AFL-CIO
Hawaii Government Employees Association, MCEC Chapter
State of Hawaii Organization of Police Officers
United Public Workers, AFSCME, Local 646, AFL-CIO
KHON2 News
Hawaii News Now
KITV4 Island News
Honolulu Star-Advertiser
Honolulu Civil Beat

Honolulu Ethics Commission – 2027

Executive Summary

This long-term strategic plan is based on discussions held in 2017, 2018, and 2019. It will be revisited periodically over the next several years—2020 (year three), 2022 (year five), and 2024 (year seven)—and as key assumptions change or as internal or external conditions require.

Mission Statement

To ensure that all employees, elected officials, and appointed officers demonstrate the highest standards of ethical conduct so that the public may have trust and confidence in the integrity of government.

“We hold the public’s trust.”

I. Who We Are

We are the City & County of Honolulu’s ethics watchdog agency. Our job is to ensure that all of Honolulu’s approximately 10,000 elected leaders, appointed officials, and employees understand and follow the highest ethical standards of conduct governing their work for the public.

II. What We Do

We have jurisdiction over education and enforcement of conflicts of interest, including gifts; disclosure of personal and financial conflicts of interest; preferential treatment and misuse of city resources; and lobbyist regulation.

III. Why We Are Working on a Forward-Facing Strategy

We are giving intentional forethought to shape the Commission’s future and foresee these strategic issues: clarifying the Commission’s prosecutorial function; building stronger community understanding of the Commission; further strengthening the prevention of ethics violations; and making sure the Commission’s work is right-sized.

IV. Dashboard

Our dashboard establishes metrics and vital signs we plan to use to monitor ourselves and is meant to be a management and decision support tool for Commissioners and Staff.

Key Values

Independence — Transparency — Above Reproach

Objectives

Objective 1: Strengthen the internal capabilities and procedures of the Commission.

Objective 2: Review, update, and realign ethics programs for compliance, effectiveness, and efficiency.

Objective 3: Further strengthen and expand the education and training of Honolulu’s approximately 10,000 officers, employees, and elected officials.

Objective 4: Develop, implement, and use a simple set of overall effectiveness measures that will describe quantitatively the core efficacy of the Commission.

Honolulu Ethics Commission – 2027

This strategic plan involved a review of current practices and procedures, and sets forth a blue print for the future.

This document creates a longer-term strategy and is based on discussions held in 2017, 2018, and 2019. It remains a work in progress, a flexible and directional touchstone for Commissioners and Staff. It will be revisited periodically over the next several years—2020 (year three), 2022 (year five), and 2024 (year seven)—and as key assumptions change or as internal or external conditions require. As needed, we will use it as source material to drive specific changes in direction, laws and rules, procedures, and activities.

As part of our strategy, we will examine other jurisdictions and determine best practices for ethics commissions and ethics oversight. Similar jurisdictions may have similar ethics laws, oversight and enforcement responsibilities, population size, demographics, and geographic size, among other factors.

Finally, we commit to properly balancing transparency and openness with necessary and legally warranted confidentiality. Critical to our success, however, is the need for appropriate resources, including adequate budget, number and type of staff, and commissioner capacity proportionate to the overall workload.

Mission Statement

To ensure that all employees, elected officials, and appointed officers demonstrate the highest standards of ethical conduct so that the public may have trust and confidence in the integrity of government.

“We hold the public’s trust.”

I. Who We Are

Chartered by the Hawai'i State Constitution and Revised Charter of the City & County of Honolulu, we are the City & County of Honolulu's ethics watchdog agency. Our job is to ensure that all of the C&C's approximately 10,000 elected leaders, appointed officials, and employees understand and follow the highest ethical standards of conduct governing their work for the public.

In Fiscal Year 2017, we began to review our policies and procedures to determine where we were and then plan for the future. We filled our full complement of five budgeted staff—Executive Director and Legal Counsel, Associate Legal Counsel, Investigator, and two Legal Clerks—and assessed and debriefed our practices and began making adjustments for efficiency and effectiveness. The work is on-going, but in progress.

Skills training for Commissioners and Staff is also essential for success. While some training has been accomplished—for example, sunshine law and government records training, core computer application refresher training, and investigation training—there is more to do if we are to function at the highest level.

II. What We Do

We have jurisdiction over education and enforcement of the following laws:

- Conflicts of interest, including gifts
- Disclosure of personal and financial conflicts of interest
- Preferential treatment and misuse of city resources
- Lobbyist regulation

To implement these laws, we currently educate approximately 10,000 C&C employees, cabinet members, City Council members, and board and commission members biennially.

In addition, we address approximately 1200 ethics concerns, requests for advice, and inquiries, and receive approximately 800 financial disclosures and 300 lobbyist registration and annual report forms annually. We conduct ethics investigations as

appropriate and refer concerns that are beyond our jurisdiction to other agencies. Although we respond to most requests for advice within a day, we have a backlog of investigations.

III. Why We Are Working on a Forward-Facing Strategy

We are giving intentional forethought to shape the Commission's future. We have a competent and hardworking Staff and a strong set of Commissioners, all of whom are dedicated to implementing the agency's mission. We anticipate a rising volume of work and cases of increasing complexity. With this document, we want to further position ourselves so that our work is conducted with the greatest possible efficiency and integrity.

We also foresee specific strategic issues that current and future commissions will encounter:

- 1. Clarifying the Commission's Prosecutorial Function.** Currently we manage a set of functions that in the larger justice community are separated and have procedural walls between them: (1) investigation; (2) prosecution of contested matters; and (3) sitting as a tribunal. From time to time cases of long running complexity have arisen that demanded more than should be expected from a small staff and volunteer commissioners. The Commission must have the discretion and resources to hire outside prosecutors and hearings officers when needed.
- 2. Building Stronger Community Understanding of the Commission.** Staff receives numerous calls and inquiries each day, many of which fall outside the Commission's responsibility. We take our mission of safeguarding the public's trust and confidence in City and County government very seriously and recognize the need to improve the community's understanding of what the Commission can and can't do. We welcome specific ideas to improve our laws, rules, and procedures.
- 3. Further Strengthening the Prevention of Ethics Violations.** We have made steady progress on training and education for city workers but more remains to be done. We seek to ensure that scrupulous adherence to all relevant codes of ethical conduct is embraced and embedded in a firm foundation of the city's culture.
- 4. Making Sure the Commission's Work is Right-Sized.** Depending on how the above (and other) long term issues are shaped, the Commission's actual working

resources need to be at the appropriate scale. This comes down to adequate staff, adequate budget, and an adequate number of commissioners.

At present, the Commission’s staff includes: one (1) Executive Director and Legal Counsel, one (1) Associate Legal Counsel, one (1) Investigator, and two (2) Legal Clerks. In addition, the fiscal year 2020 budget funds a new position—an Assistant Executive Director and Legal Counsel.

However, even after the new position is filled, the Commission’s staffing resources will be inadequate to meet ethics program requirements as set forth in the Hawai‘i State Constitution, Revised Charter of Honolulu, and the Revised Ordinances of Honolulu. If such program mandates are to be fulfilled, the Commission must make increasing staff and enhancing resources to contract independent prosecutors and hearings officers a budget priority for the next decade.

IV. Dashboard

Here are the metrics and vital signs we plan to use to monitor ourselves. Wherever possible, we will apply “aging” reports to evaluate our workload and stay alert for backlogs, gaps, and case-handling delays. This dashboard is meant to be a management and decision support tool for Commissioners and Staff.

Trailing Indicators (*Looking Back*)

1. Requests for training
2. Requests for advice
3. Advisory opinions (informal and formal)
4. Preliminary determinations (reevaluate and address via future rule-making or policy adoption)
5. Investigations
6. Ethics concerns filed
7. Requests for information via the Uniform Information Practices Act (UIPA), Hawai‘i Revised Statutes Chapter 92F
8. Age of backlogs

9. Hearings
10. Ethics Commission meetings that comply with Hawai‘i open meetings law, also known as the sunshine law, Hawai‘i Revised Statutes Chapter 92

Leading Indicators (*Looking Ahead*)

11. Anticipated population growth/decline in the C&C of Honolulu
12. Anticipated number of C&C employees and elected and appointed officials
13. Anticipated number of new employees and elected and appointed officials
14. Anticipated Ethics Commission budget and staff positions required to handle anticipated needs

V. Our Key Values

1. **Independence.** We will dispassionately appraise every circumstance that comes before us against pertinent laws and specific facts. We will play no political favorites, and let the chips fall where they may.
2. **Transparency.** We will strive for the greatest possible openness while honoring the rights of privacy and confidentiality. We endeavor to balance a user-friendly guidance and approach with sound procedures to vet, triage, and bring actions to enforce the City’s standards of conduct.
3. **Above Reproach.** We ourselves, as a Commission and as individuals, will continuously strive to exemplify the behaviors we enforce on others.

VI. The Current Situation

Here is how we evaluate ourselves at this moment:

Major Strengths	Major Weaknesses
We now have a strong Staff in place and a cohesive and dedicated group of Commissioners.	Our budget is insufficient to meet our core needs and rising demands. Our existing staff is not large enough to fulfill all ethics program functions;

<p>Our relationships with other agencies are continuously improving.</p> <p>We are developing increasingly better methods of training the City’s approximately 10,000 officers and employees on their ethical duties.</p> <p>Our monthly data collection and reporting systems are steadily improving.</p> <p>Our Ethics Commission meetings are more efficient with good opportunities for public testimony.</p>	<p>that is, investigate, prosecute, issue advisory opinions, conduct ethics training, and regulate lobbyists, among others.</p> <p>We need to update and clarify our rules.</p> <p>We need to update our policies and procedures.</p> <p>Staff and Commissioners lack sufficient opportunities for skills and ethics training and upward mobility and opportunities to interact with ethics commissions of other jurisdictions.</p> <p>The ordinances that direct and guide us require updating.</p> <p>We are not well understood by City elected officials, officers, employees, and the public at large.</p> <p>We remain entangled in past litigation, which impedes our work, drains resources, and erodes public trust.</p> <p>Administrative support duties are blurry and need to be clarified.</p> <p>How we interpret and best function with sunshine law requirements is an on-going effort.</p>
<p style="text-align: center;">Opportunities</p> <p>We can define, operationalize, and make public our best practices.</p> <p>Rotation of Commissioners brings new perspectives and adds strength.</p> <p>We can utilize skilled volunteers who understand the Ethics Commission’s work.</p> <p>There are opportunities to amend ordinances and adopt rules.</p> <p>We can position ourselves for inevitable future administrations and councils.</p>	<p style="text-align: center;">Challenges</p> <p>Turnover, rotation, and potential loss of Staff and Commissioners.</p> <p>Flat resources or budget cuts if the economy dips, which is expected.</p> <p>A small number of excessively time-consuming cases that pull resources away from other required work.</p> <p>Physical office location is not close to other agencies.</p> <p>Scofflaws who ignore C&C ethical requirements, for which the Ethics Commission gets blamed.</p>

<p>We can explore coordinating ethics trainings, for mutual benefit, with other departments and agencies.</p>	
<p>We can explore collaborating with state and county agencies to harmonize requirements and forms.</p>	

VII. Assumptions About the Next 10 Years

- Ethics Commission’s staffing needs will increase even as we gain efficiency.
- Our budget will always be subject to approval by others.
- Our caseload will go up because:
 - The more training and outreach we do, the more inquiries and cases are generated.
 - As the social fabric in Hawai‘i changes because of demographic shifts and as O‘ahu becomes more crowded and factionalized, we will receive more ethics inquiries and concerns. People are increasingly argumentative and litigious.
 - When the economy dips and city services are diminished, we will receive more ethics inquiries, concerns, and requests for advice.
 - As C&C employee ranks turn over, training will need to be continuously refreshed and delivered to new cohorts of employees.
- More employees will have electronic devices, enabling greater reach for ethics training. Computerized training delivery will become easier, faster, and cheaper.
- The “80/20” principle will continue to prevail; that is, 80 percent of our work and effort will tend to respond to 20 percent of our caseload. Some of that 20 percent will be hot potatoes with high media visibility. As social media expands, there may be increasing numbers of high profile, hot potato cases.

- We will always be in some kind of “stretch mode” and likely never have all the resources our demands require.
- Over the next 5-10 years, federal and state funding will decline.
- The process of Commissioner appointments will stay the same: Mayor appoints, Council confirms.
- We will need to do more effective education and outreach to the Mayor and Council to ensure they understand what we do, what their unique ethical requirements are, and to secure the funds and positions we need to operate effectively.
- The Commission may on its own initiative initiate complaints.

VIII. Objectives

Objective 1: Strengthen the internal capabilities and procedures of the Ethics Commission.

- a. Ensure the Commission is adequately staffed and staff members are adequately and fairly compensated. Considering the legal mandates for the C&C ethics program, the Commission has determined that its ideal staff complement includes 10 full-time positions. To achieve this, the Commission will request five new full-time positions over time:
 1. Executive Director and Legal Counsel
 2. Assistant Executive Director and Legal Counsel
 3. Executive Secretary/Assistant (new)
 4. Associate Legal Counsel
 5. Associate Legal Counsel (new)
 6. Investigator
 7. Investigator (new)
 8. Training Specialist (new)
 9. Administrative Specialist (new)
 10. Legal Clerk
- b. Acquire and implement a case management data base to enable tracking, dashboard monitoring, and reporting.

- c. Acquire and implement a comprehensive compendium of Ethics Commission Advisory Opinions and Ethics Commission-related Corporation Counsel Opinions that is easy to use when conducting legal research.
- d. Develop and implement training and professional development activities for Staff and Commissioners. Potential areas to be covered include sunshine law, information technologies, and data management. Although some training and development opportunities are free or at little cost, others require budget resources to pay for conference registration fees, as well as travel and other expenses. Mechanisms can include:
 - i. State Public Library’s Gale Courses for computer application training (MS Outlook, Word, Excel, Power Point, Access, others);
 - ii. Equal Opportunity Office Internal Investigation Training;
 - iii. Reid Investigator Interview Training; and
 - iv. Attendance at Council on Governmental Ethics Laws (COGEL) and/or the Society of Corporate Compliance and Ethics (SCCE) conferences.

Objective 2: Review, update, and realign ethics programs for compliance, effectiveness, and efficiency:

Areas to be Reviewed for Changes, Priorities	Charter, Ordinance	Substantive Admin Rules	Procedural Admin Rules	SOPs	Training, Education
Financial Disclosures	x	x		x	x
Lobbyist Regulations	x	x		x	x
Separation of Duties (intake, investigation, prosecution, adjudication)	x		x	x	
Gifts	x	x		x	x
Fair & Equal Treatment	x	x		x	x
Conflict of Interest Disclosures	x	x		x	x

In conjunction with the above:

- a. Examine procedures from: Hawai’i Office of Disciplinary Counsel (ODC); Regulated Industries Complaints Office (RICO), Hawai’i

Department of Commerce and Consumer Affairs (DCCA); and other ethics commissions, e.g., Austin, TX (2017 population ~950,715); City and County of San Francisco, CA (2017 population ~884,363); San Jose, CA (2017 population ~1.035 million); Jacksonville, FL (2017 population ~892,062); among others; and also review their staff-to-workload ratios.

- b. Review and revise, as needed, the definition of “complaint” and consider disallowing anonymous complaints to proceed to investigation without a named complainant. Prior to that, it would be a “contact.”
- c. Provide opportunity to review proposed changes and offer comments and concerns.
- d. Analyze and determine whether to have in-house prosecutors or contract a prosecutorial function.
- e. To ensure uniformity of practice and continuity to the future, develop an updatable set of policies and procedures available to the Commission, Staff, and the public. Collate existing Commission policies and procedures and develop new ones in conjunction with future changes to the ordinances and rules described above.
- f. Consider adopting as a policy that the Commission may not initiate or proceed with its own investigation if official investigations are being conducted by other agencies or tribunals with sufficient resources and enforcement powers. Any such policy must recognize that the Commission enforces ethics laws, which may be very different from those of other agencies or tribunals.

Objective 3: Further strengthen and expand the education and training of the City & County of Honolulu’s ~10,000 officers, employees, and elected officials.

- a. Develop and deliver improved outreach materials (brochures, FAQs, newsletters, etc.) that describe the Commission’s work and provide offers of assistance.
- b. Conduct additional outreach to all elected and appointed officials and to all agency employees to make them fully aware of the Commission’s capabilities and to provide regular or specialized trainings.

- c. Continue to refine, track, and regularly evaluate the use of training software as a core-training tool.
- d. Offer an annual training for lobbyists, possibly with the State Ethics Commission to avoid duplication of efforts.
- e. Continue to work with the City Department of Information Technology to develop an in-house ethics training application for both domain users (honolulu.gov) and non-domain users (e.g., board and commission members).

Objective 4: Above and beyond our management “dashboard,” develop, implement, and use a simple set of overall effectiveness measures that will describe quantitatively the core efficacy of the Commission. The measures should reflect both inputs and outputs and the quantity and quality of both.

IX. Short Term Actions – Fiscal Years 2017, 2018, and 2019

Actions completed or started in fiscal year 2017 are shown in Attachment 1, *Accomplishments - FY2017 (July 1, 2016–June 30, 2017)*.

Actions completed or started in fiscal year 2018 are shown in Attachment 2, *Accomplishments - FY2018 (July 1, 2017–June 30, 2018)*.

Actions completed or started in fiscal year 2019 are shown in Attachment 3, *Accomplishments - FY2019 (July 1, 2018–June 30, 2019)*.

Actions to be continued, completed or started in fiscal year 2020 will be reported at monthly Ethics Commission meetings in a format similar to Attachments 1, 2, and 3.

Attachment 1
Accomplishments - FY2017
(July 1, 2016 - June 30, 2017)

Item	Timeframe
Ethics Commission - 7-Member Commission Fully Appointed	Aug 2016 - 1 new commissioner appointed (Adler) Apr 2017 - 2 holdover commissioners termed out (Silva, Yuen) May 2017 - 2 new commissioners appointed (Kanda, Monk)
Personnel - All Budgeted Vacant Positions Filled in FY2017, EC Fully-Staffed (5/5)	May 2016 - 2 legal clerks on staff (2/5 staff) Aug 2016 - ALC and EDLC hired (4/5 staff) Nov 2016 - INV hired (5/5 staff)
Interns, Fellows Assisted EC	Jan - Jul 2017 - 1 Pookela Fellow (12 hrs/wk) Mar - Sep 2017 - 1 MPA Intern (rules, guidelines) Jun - Aug 2017 - 2 law school interns (brief AOs)
Office Relocated to Kapālama Hale	Nov 2016 - relocated from South King Street to Kapālama Hale Feb 2017 - 1st EC meeting held in Kapālama Hale
Strategic Planning Commenced	Fall 2016 - began planning Apr, May, Sep 2017 - PIG meetings - Apr, May, Sep 2017 June 2017 - draft discussed at EC meeting, posted to website, comments solicited
Ethics Training - Learning Management System (LMS) Development On-Going	Fall 2016 - began working with DIT to develop LMS Spring 2017 - create prototype LMS for all officers/employees, test pilot on Legislative Spring 2017 - create prototype LMS for bd/comm member training, test pilot on select bds/comms
Advisory Opinions Issued (2)	AO 2017-1 (re: independent expenditures by Super Political Action Committees) AO 2017-2 (re: EC's jurisdiction to decide if a councilmember's receipt of 40% or more of campaign contributions by a special interest group creates a conflict of interest)
Ethics Inquiries	Total # inquiries - 278 # inquiries closed - 261 (94%) # requests for advice - 189 (68%) # complaints - 87 (31%)
Ethics Commission Meetings (13)	Timely agendas filed, mins prepared, materials prepped/uploaded, post-meeting clean-up Fall 2016 - Meeting format amended, utilize IT equipment for enhanced transparency Spring 2017 - Website redesigned to feature agendas, minutes, meeting materials Spring 2017 - Meeting materials posted to website when distribution made to Commission
Ethics Outreach - Newsletters Produced and Delivered	Winter (Dec) 2016 Spring/Summer (May) 2017

Attachment 1
Accomplishments - FY2017
(July 1, 2016 - June 30, 2017)

Office Procedures Reviewed, Amended, Implemented

Fall 2016/Spr 2017 - implemented new EC meeting procedures, timeframes, deadlines
Fall 2016/Spr 2017 - implemented weekly staff meetings, case management meetings
Fall 2016/Spr 2017 - implemented EC meeting calendar with relevant dates, deadlines
Fall 2016/Spr 2017 - posted EC meeting agendas, minutes, materials in more accessible
Winter 2016 - amended financial disclosure forms and instructions
Spr 2017 - posted meeting materials to Commissioners and public at the same time
Spr 2017 - debriefed lobbyist reg'n, annual rpt; F/D; disclosure of interest (CC-8)
Spr 2017 - uploaded lobbyist summary, registration forms to website
Sum 2017 - revised intake form, procedures

Charter Amendment and Conforming Legislation Passed

Fall 2016 - track charter amendment through Nov 2016 general election
Nov 2016 - charter amendment passes
Spring 2017 - submit bill to conform ordinances to charter amendment
Summer 2017 - amended ordinance passes

Training Taken - 7 Commrs (6 hours)

OIP - training session @ EC meeting on UIPA and sunshine law

Training Taken - 5 Staff (400+ hours)

OIP - training session @ EC meeting on UIPA and sunshine law
OIP training and new rules
Reid Investigator Training
Internal Investigator Training
Management Development Training
Excel, Word, Power Point, other computer application training
Senior Management Training
State Ethics Training
Center for the Advancement of Public Integrity Training (online)
Benefits Processing
New Employee Orientation Training
LexisNexis Training
Prevention of Sexual Harassment Training
Lifting Hazards & Proper Lifting Techniques Training
DIT Video-Conferencing Training
Open Web Ethic Concerns Training
Leadership Seminar
Legislative Reference Bureau and Administrative Rules Drafting Manual
Native Hawaiian Peacemaking Concepts
DEM Disaster Training
Fire Extinguisher Training
Dbase Management Essentials

Statistics - Newly Compiled and Reported

EC complaints - by quarter, FYs, comparisons
RFAs - by quarter, FYs, comparisons
Budget - FY comparisons
Intake - category breakdown
Financial Disclosures - FYs, comparisons
Lobbyists - FYs, comparisons
Disclosure of Interests (CC-8)

Attachment 1
Accomplishments - FY2017
(July 1, 2016 - June 30, 2017)

UIPA requests

Website hits - FYs, comparisons

Managed Litigation

Managed Procurement for Conflict of Interest Cases

Document Management - EC Files Scanned and Archived, Hardcopies Shredded

Hardcopy files prepped, scanned for archiving

Hardcopy files shredded

Target completion - FY2018

Last Updated: 2018-02-16

Attachment 2
Accomplishments - FY2018
(July 1, 2017 - June 30, 2018)

Item	Timeframe
Ethics Commission - 7-Member Commission Fully Appointed	
Personnel - All Budgeted Vacant Positions Filled in FY2017; Retirement (1) FY2018	
	Dec 2017 - legal clerk (1) retirement (4/5 staff)
	Jan 2018 - legal clerk I (TA) to legal clerk III
	Feb 2018 - P/T sr. clerk hired (Feb - May 2018)
	Apr 2018 - position redescription submitted SR13/BU3 -> SR18/BU13
	May 2018 - position redescription submitted SR10/BU3 -> Secty II or III, SR14 or 16/BU3
Interns, Fellows	
	Meeting - US State Dept Prof'l Fellow
	Feb 2018 - contacted law school for legal intern
Strategic Planning	
	Sep 2017 - comments received from public, agencies, unions, EC commissioners
	Oct, Nov 2017 - comments incorporated, draft reviewed at EC meetings
	Jan, Feb 2018 - amended draft reviewed EC meeting
	Mar 2018 - plan adopted
	Apr 2018 - plan revisited for budget amendments
	May 2018 - plan amended
Ethics Training - Learning Management System (LMS) Development	
	Fall 2017 - launch LMS for all domain users officers/employees training
	Fall 2017 - utilize Mindflash (priv software) for non-domain users (bd/comm member training)
	Winter 2017 - launch LMS and video DVD training for non-domain users officers/employees
	Winter/Spr 2018 - agencies deployed LMS and training videos; completed employee training
	Sum 2018 - agencies completed officer, employee, bd/comm member training
Advisory Opinions Issued (1)	
	Feb 2018 - AO 2018-1 issued (re: alleged violation of RCH Sec. 11-104 against a City employee)
Ethics Data Reported (New Categories in City Annual Report)	
	Contacts Rec'd (requests for advice, concerns, misc. inquiries) - 613
	Contacts Ans'd (requests for advice, concerns, misc. inquiries) - 601
	Concerns Rec'd - 58
	Emp'ees Trained - 9686
	Bd/Comm Members Trained - 176
	Disclosures Rec'd (financial, conflict of interest, outside interest, candidate, nomination) - 841
	Lobbyist Filings Rec'd (registrations, annual reports) - 323
Ethics Commission Meetings (11)	
	Timely agendas filed, mins prepared/uploaded, post-meeting clean-up completed
Ethics Outreach - Newsletters produced and Delivered	
	Winter (Dec) 2017
	Gift Guide (Dec) 2017
	Summer (May) 2018
Office Procedures Reviewed, Amended, Implemented	
	Winter 2017 - Lobbyist forms, process revised
	Winter 2017 - Financial disclosure forms reviewed, process revised
Legislation - None	

Attachment 2
Accomplishments - FY2018
(July 1, 2017 - June 30, 2018)

Training - 7 Commrs (49+ hours)

- SCCE - 2 Commrs attend annual conference (paid own way)
- Common Cause Ethics Session
- Strategic Communication (Kanda)
- Administrative Hearings (Office of Administrative Hearings, State DCCA)

Training - 5 Staff (211+ hours)

- SCCE - EDLC attend annual conference (paid own way)
- COGEL - EDLC attend annual conference
- Common Cause Ethics Session
- Team Building Training
- Strategic Communication (Kanda)
- Administrative Hearings (Office of Administrative Hearings, State DCCA)
- Sr. Management Meetings (City Admin)
- Center for the Advancement of Public Integrity (CAPI) CLE, webinars
- Millennial jurors and co-workers (HSBA/GLS)
- CPR/AED Training
- Administer HPD recruit training
- Ergonomics
- Prevention of sexual harassment
- Leadership Forum (DHR)
- Ethics Training (all City employees)
- Rules and sunshine law training
- MS Word

Other Statistics (Compiled, Reported in City Annual Report & EC Meetings)

- EC complaints - by quarter, FYs, comparisons
- RFAs - by quarter, FYs, comparisons
- Budget - FY comparisons
- Intake - category breakdown
- Financial Disclosures - FYs, comparisons
- Lobbyists - FYs, comparisons
- Disclosure of Interests (CC-8)
- UIPA requests
- Website hits - FYs, comparisons

Managed Litigation (on-going)

Managed Procurement for Conflict of Interest Cases (none)

Document Management - EC Files Retained Electronically (on-going)

Last Updated: 2019-02-13

Attachment 3
Accomplishments - FY2019
(July 1, 2018 - June 30, 2019)

Item	Timeframe
Ethics Commission - 7-Member Commission Fully Appointed	
Personnel - Vacant Position (1)	
	Dec 2017 - legal clerk (1) retirement (4/5 staff)
	Jan 2018 - legal clerk I to legal clerk III (TA)
	Feb 2018 - P/T sr. clerk hired (Feb - May 2018)
	Apr 2018 - position redescription submitted SR13/BU3 -> SR18/BU13
	May 2018 - position redescription submitted SR10/BU3 -> Secty II or III, SR14 or 16/BU3
	June 2019 - developed ideal Ethics Commission staffing, incorporated in strategic plan
	June 2019 - meeting with ASO to discuss ideal Ethics Commission staffing
Interns, Fellows	
	Fall 2018 - contacted law school for legal intern
Strategic Planning	
	Fall 2018 - plan amended
	Winter 2019 - PIG meeting, plan amended
	Summer 2019 - PIG meeting, plan amended
Ethics Training - Learning Management System (LMS) Development	
	Summer 2018 - agencies completed, certified all-employee training
	Summer 2019 - finalizing non-domain user interface for bd/comm member training
	Summer 2019 - finalizing all-employee biennial ethics training curriculum
Specialized Training	
	Fall 2018 - HFD new captains
	Fall 2018 - HPD new captains
	Winter 2019 - cabinet and Mayor's key staff (5 sessions)
	April 2019 - HFD new captains
Formal Advisory Opinions Issued (5); Informal Advisory Opinion Issued (109)	
	Aug 2018 - AO 2018-3 issued (re: failure to file financial disclosure by a city officer)
	Oct 2018 - AO 2018-2 issued (re: alleged violation of RCH Sec. 11-104 against a city dept)
	Oct 2018 - AO 2018-4 issued (re: whether proposed provision would violate the City's Standards of Conduct)
	Apr 2019 - AO 2019-1 issued (re: alleged violation of RCH Sec. 11-104 against a city officer)
	Apr 2019 - AO 2019-2 issued (re: alleged violation of RCH Sec. 11-104 against a city officer)
Ethics Data Reported (New Categories in City Annual Report)	
	Contacts Rev'd (requests for advice, concerns, misc. inquiries) - 481
	Contacts Ans'd (requests for advice, concerns, misc. inquiries) - 458
	Concerns Rev'd - 108
	Emp'ees Trained - 843
	Bd/Comm Members Trained - 0
	Disclosures Rev'd (financial, conflict of interest, outside interest, candidate, nomination) - 878
	Lobbyist Filings Rev'd (registrations, annual reports) - 378
Ethics Commission Meetings (8)	
	Timely agendas filed, mins prepared/uploaded, post-meeting clean-up completed
Ethics Outreach - Newsletters, Twitter	
	Winter (Dec 2018) - newsletter
	Winter (Dec 2018) - Ethics Elf on the Shelf outreach via Twitter
	Gift Guide (Dec) 2018
	Summer (May) 2019 - newsletter
Office Procedures Reviewed, Amended, Implemented	
	Winter 2018 - lobbyist forms, process revised
	Winter 2018 - financial disclosure forms reviewed, process revised

Attachment 3
Accomplishments - FY2019
(July 1, 2018 - June 30, 2019)

Legislation

- Spr 2019 - lobbyist legislation drafted
- Spr 2019 - financial disclosure drafted

Training - 7 Commrs (16+ hours)

- SCCE (1 Cmmr attended, paid own way)
- Weinstein - Fraud and Its Recent Giants
- Weinstein - Ethics in Politics

Training - 5 Staff (118+ hours)

- SCCE (ALC, EDLC attended, EDLC paid own way)
- Sr. Management Meetings (City Admin)
- Center for the Advancement of Public Integrity (CAPI) CLE, webinars
- Prevention of Sexual Harassment (City EOO)
- Leadership Forum (City DHR)
- Ethics Training (all City employees)
- Rules and sunshine law training (OIP)
- Weinstein - Ethics in the Boardroom
- Agenda/minutes Event Calendar Training
- Weinstein - Legal Ethics
- Weinstein - Ethics in Politics
- Pre-Retirement Planning Seminar (City)
- Investigations 101 (City)
- Accessible Websites & Documents (City)
- Weinstein - Ethics in Capitalism
- Leadership Facilitation and Meeting Management
- CPR-AED
- LexisNexis
- Basic Mediation Training (Mediation Center of the Pacific)

Other Statistics (Compiled, Reported in City Annual Report & EC Meetings)

- EC complaints - by quarter, FYs, comparisons
- RFAs - by quarter, FYs, comparisons
- Budget - FY comparisons
- Intake - category breakdown
- Financial Disclosures - FYs, comparisons
- Lobbyists - FYs, comparisons
- Disclosure of Interests (CC-8)
- UIPA requests
- Website hits - FYs, comparisons

Managed Litigation (settled)

Managed Procurement for Conflict of Interest Cases (on-going)

Document Management - EC Files Retained Electronically (on-going)

Last Updated: 2019-09-09