

City of San Jose Board of Fair Campaign and Political Practices  
Work Plan for FY 2018-19

Objective for FY 2018-19	Actions	Timeframe
1. Monitor compliance with all campaign and ethics ordinances in Title 12 of the Municipal Code [Ref: SJMC 12.04.070(A)]	<ul style="list-style-type: none"> <li>Periodically review and assess impact of compliance data obtained from the city clerk's prima facie review of disclosures and reports filed in accordance with campaign and ethics ordinances <ul style="list-style-type: none"> <li>Evaluate cumulative results of compliance monitoring and identify possible areas of concern with regard to campaign and ethics regulations</li> </ul> </li> <li>Work with the city clerk to develop and implement a plan for diverse community outreach regarding campaign and ethics regulations and procedures</li> </ul>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
2. Review and investigate allegations of violations of Title 12 and take enforcement action where appropriate [Ref: SJMC 12.04.070(B)]	<ul style="list-style-type: none"> <li>Review, investigate and take appropriate enforcement action for each allegation of a Title 12 violation per Resolution 78390, with the objective of having the independent evaluator's report and recommendations available within 30 calendar days after receipt of a complaint <ul style="list-style-type: none"> <li>Evaluate cumulative results of investigations and identify possible areas of concern with regard to campaign and ethics regulations</li> </ul> </li> </ul>	<p>Ongoing</p> <p>Ongoing</p>
3. Make recommendations to the city council with regard to campaign and ethics regulations and policies [Ref: SJMC 12.04.070(C)]	<ul style="list-style-type: none"> <li>Continue evaluating how other local ethics commissions manage their complaint intake process to identify possible alternatives in San Jose that could mitigate complaints without substance from going through the preliminary evaluation and public hearing process</li> <li>Based on evaluations of cumulative results from compliance monitoring, investigations and legislative review, work with the City Attorney and City Clerk to develop recommendations that can be forwarded to the City Council for amending regulations, procedures and/or forms for FY 2019-20's biennial ethics review</li> <li>Provide recommendation(s) for each campaign or ethics issue referred by the city council, with the objective of providing a response within 120 calendar days</li> </ul>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
4. Settle challenges to commission decisions in accordance with Section 4.24.050 of Title 4 [Ref: SJMC 12.04.070(D)]	<ul style="list-style-type: none"> <li>Settle challenges to commission decisions as required</li> </ul>	<p>Ongoing</p>

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5. Respond to complaints alleging that records or some part of records are being withheld improperly under the Public Records Act [Ref: SJMC 12.21.430(C)]	<ul style="list-style-type: none"> <li>Review and evaluate each public records complaint as required and respond within 30 calendar days</li> <li>If intentional or repeated public records violations are found, consider recommending corrective action to the appropriate council appointee</li> </ul>	<p>Ongoing</p> <p>Ongoing</p>
6. Provide to the council each fiscal year an annual work plan of activities to be undertaken and a subsequent report of accomplishments [Ref: SJMC 2.08.030(C)]	<ul style="list-style-type: none"> <li>Develop and issue a 2019-20 work plan and 2018-19 annual report</li> </ul>	June 2019
7. Public Education Campaign [Ref: SJMC 12.04.070(A)]	<ul style="list-style-type: none"> <li>Title 12 ethics regulations include a range of laws including the gift ordinance, lobbying ordinance, open government ordinance, and other conflict of interest policies addressing nepotism, revolving door practices, prospective employment, and the appearance of impartiality in decision making. However, the Board typically only receives complaints regarding campaign finance ordinances. The Board will work with the City Clerk and City Attorney to identify and implement outreach opportunities including developing informational materials and building partnerships with other city departments and community organizations. This is being rolled over from FY 2017-18's Work Plan.</li> </ul>	Ongoing
8. Identify opportunities to modernize our publishing of campaign statement information [Ref: SJMC 12.06.920 – Repealed by Ord. No. 30019 on 10/31/17]	<ul style="list-style-type: none"> <li>The Board will work with the City Clerk to conduct an after-action review of the changes adopted in FY 2017-18 in the City Clerk's online public records system to determine if changes satisfy the Board's desire to improve transparency and accessibility as incorporated in the FY 2017-18 Work Plan.</li> </ul>	Ongoing