

Form 700s:

Despite High Overall Filing Rates, the City Can Improve Timeliness and Completeness of Filings

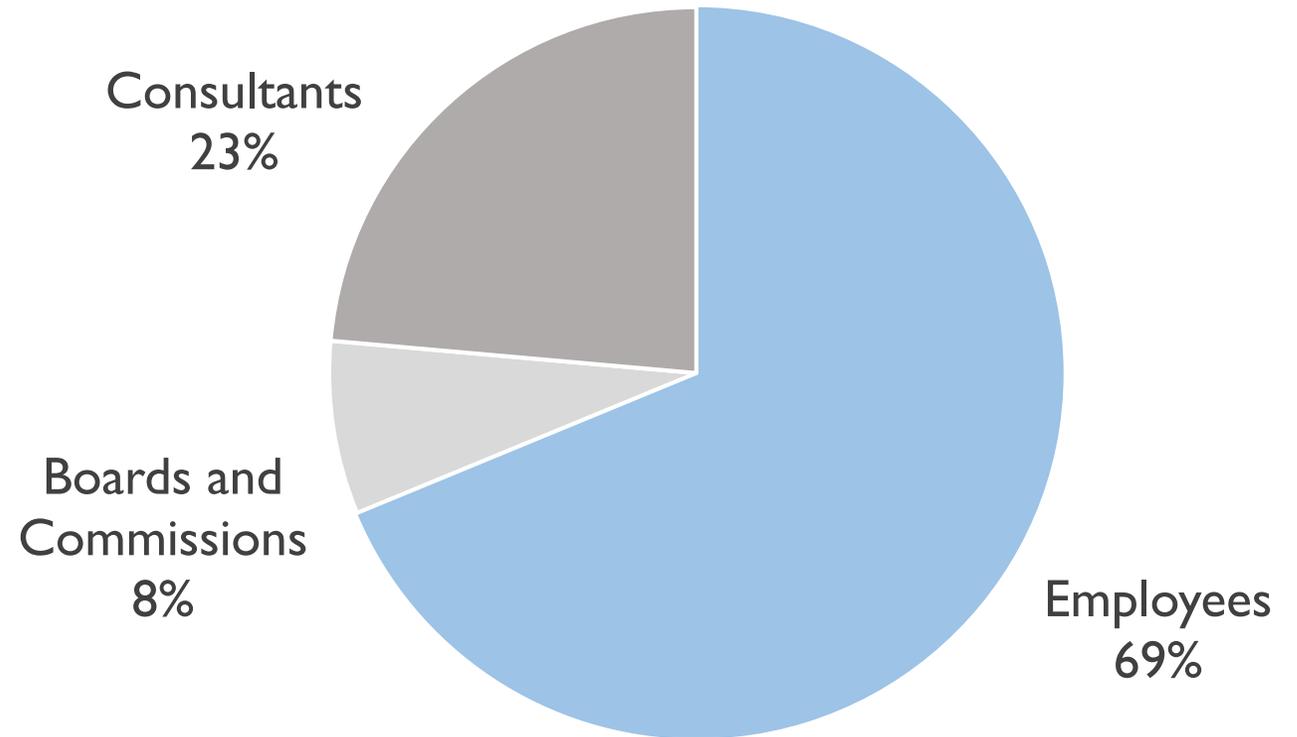
Presentation to the Public Safety, Finance, and Strategic Support Committee

August 15, 2019

San José City Auditor's Office

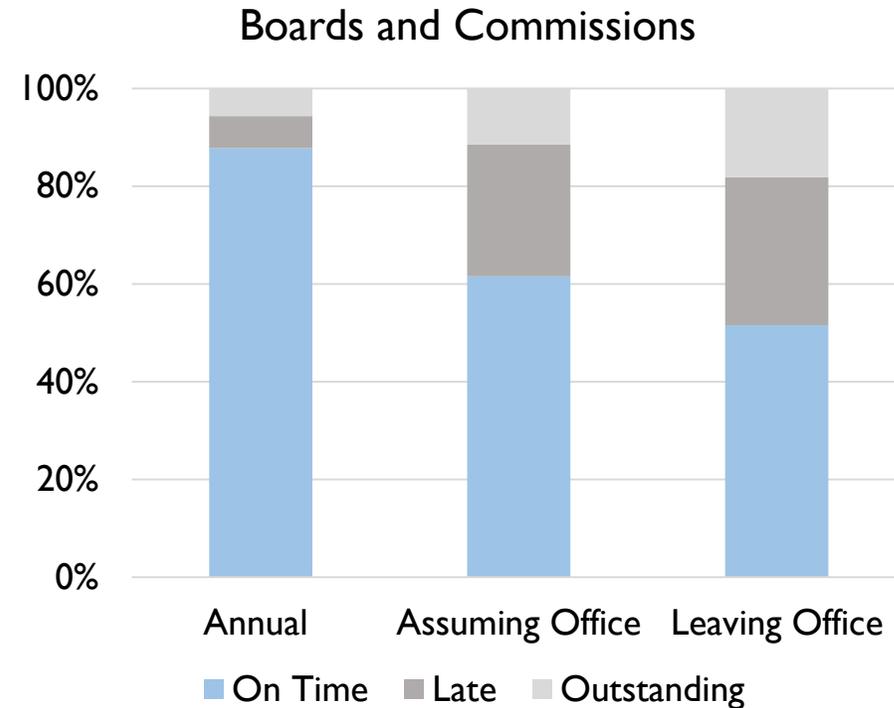
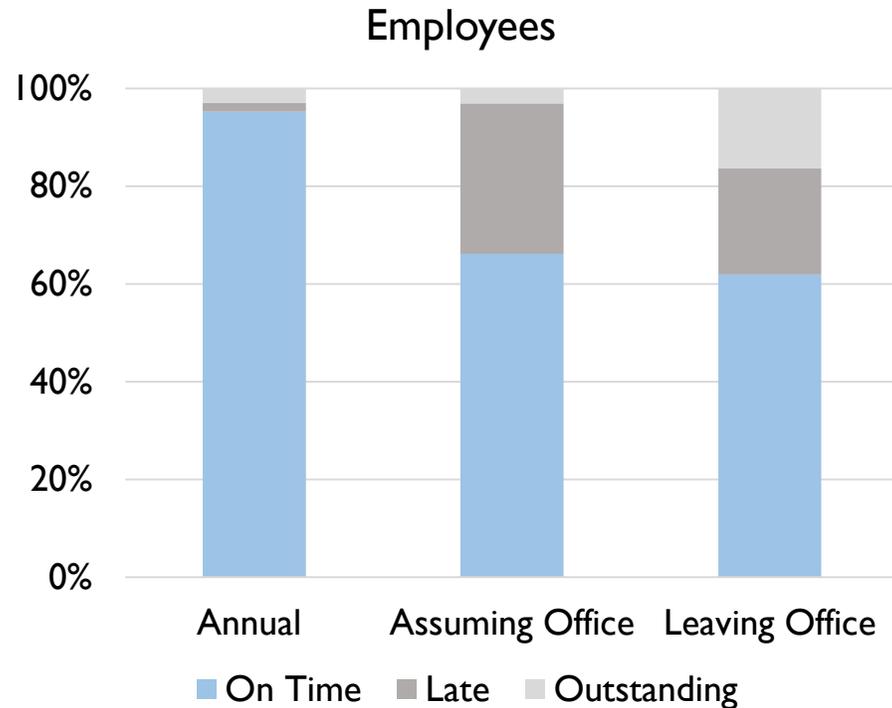
- Certain public officials, employees, and consultants disclose financial interests on a Form 700.
- There were about 2,400 assuming office, annual, and leaving office Form 700s due for 2018.
- The City Clerk's Office is responsible for collecting Form 700s and relies on department liaisons to identify filers.

City Employees Made Up the Majority of Identified Form 700 Filers for 2018



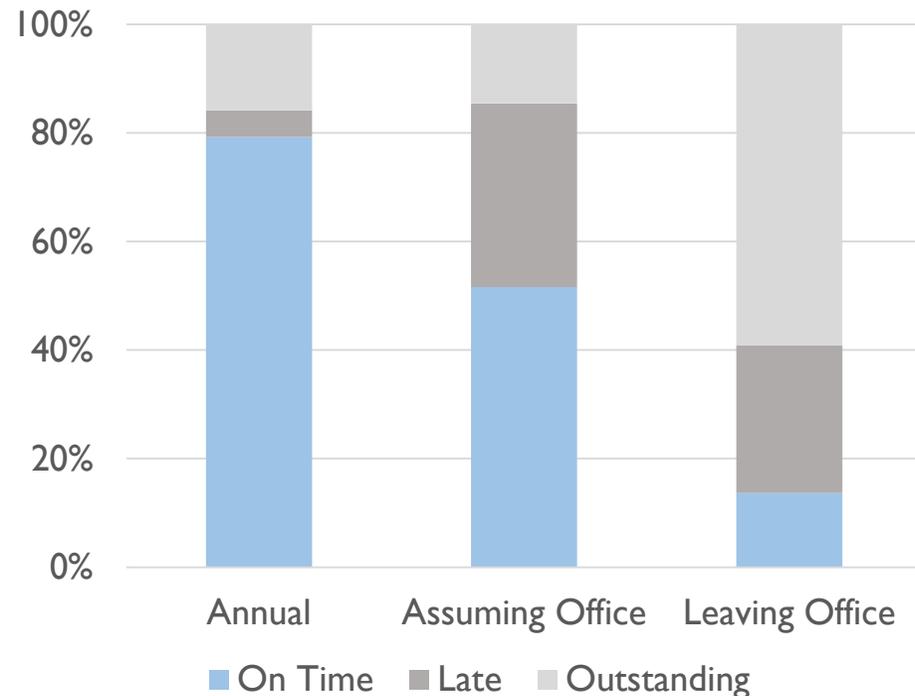
Finding I: Most Form 700s Were Filed as Required, But the City Can Improve the Timeliness of Filings

Assuming and Leaving Office Filings Were Less Timely Than Annual Filings



Finding 2: The City Can Improve Processes for Ensuring Consultants File Required Form 700s

Consultants Had Lower Filing Compliance Than Other Filers



- The Administration should clarify contract management responsibilities surrounding Form 700 filings.
- Updating contract templates to provide fields for consultant emails can improve compliance.

Finding 3: Better Guidance to Ensure Form 700s Are Complete and Reviewed for Potential Conflicts

- The City Clerk's Office can provide access to more detailed instructions and resources from the FPPC.
- The City Clerk's Office should establish procedures for reviewing filings for completeness.
- The Administration could provide guidance for departments to review Form 700s to identify potential conflicts of interest.

- Our audit report includes a total of 9 recommendations to improve timeliness and completeness of Form 700s and Family Gift Reports.
- We would like to thank the City Clerk's Office, the City Manager's Office, the City Attorney's Office, the Human Resources Department, and the Information Technology Department for their time and insight.

The audit report is available at: www.sanjoseca.gov/auditor