

Sunshine Ordinance Task Force 2023 Annual Report

Released April 8, 2023

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Executive Summary

San Francisco's Sunshine Ordinance creates enhanced rights of access to public meetings and records. This report aims to create a better understanding of how the Sunshine Ordinance operated in 2023 and to improve its ability to function as an effective tool for access to government information. The report focuses on the processing of public records requests by City administrative bodies and the resolution of complaints by the Sunshine Ordinance Task Force. It also highlights some problems encountered in administering the Ordinance.

Key findings include:

- Survey results representing 62% of San Francisco administrative bodies combined with NextRequest reporting indicated that the City received at least 54,006 records requests in 2023.
- The San Francisco Police Department accounted for 78% of all records requests.
- The self-reported mean average time City bodies took to fulfill requests was 10 days according to our survey and 20 days according to NextRequest.
- The SOTF received 103 new complaints in 2023.
- A handful of petitioners accounted for nearly half of the SOTF hearings scheduled.
- The SOTF favored complainants in most cases, finding against petitioners in only 13 of 59 cases and finding 35 Sunshine violations across all cases.
- The SOTF took an average of 407 days to resolve complaints, far longer than the 45 days mandated by the Ordinance for the SOTF to issue a determination for alleged violations of Administrative Code 67.21(b).
- Complaints were scheduled for Task Force hearings an average of 2.5 times before resolution.
- The SOTF continues to have a significant backlog of complaints and to receive twice as many complaints as it can resolve yearly under current procedures.

In addition, the SOTF recommends that:

- The City provides all officials with a government email address for retention and retrieval communication involving public business.
- The City creates a records retention policy for communication over electronic platforms.
- Any amendments to the Sunshine Ordinance clarify what constitutes an immediate disclosure request and allow City bodies to specify an IDR submission address.
- The City records custodians carefully review broad new disclosure requirements around police officer-related records under AB 1421, as well as their legal duties to seek out and provide public records held by employees and private contractors.
- Internal SOTF procedures conform to the Ordinance's use of "shall" and "may" directives.
- The SOTF continue to take steps to improve its internal processes.

Introduction

This report provides an overview of how the Sunshine Ordinance operated in San Francisco city and county (the City) in 2023. The Ordinance, contained in Chapter 67 of the San Francisco Administrative Code, outlines the public’s rights of access to government meetings and records, stipulates how City administrative bodies are to provide access to records and meetings, and creates an independent, citizen-led Task Force to oversee the law’s implementation. The mandate of the Sunshine Ordinance Task Force (SOTF) includes reviewing and resolving disputes over access, advising local government on implementation, reporting on associated practical and policy problems and proposing Chapter 67 amendments to the Board of Supervisors, and issuing reports on compliance with laws pertaining to public meetings and records (Sunshine Ordinance § 67.30(c)).

The 2023 Annual Report of the Task Force focuses on three aspects of the Sunshine Ordinance’s operation, namely:

- San Francisco administrative bodies’ reception and handling of records requests
- SOTF’s complaint resolution procedures and outcomes
- Practical and policy problems encountered in administering the Ordinance

The report aims to understand how San Francisco complied with the law in 2023, and how the Task Force and City may further strengthen compliance and implementation.

The report proceeds by first providing baseline data on San Francisco administrative bodies’ experiences with public records requests in 2023. We drew on a survey of these bodies that gathered information on the number of records requests they received, the turnaround time for requests, and some key data on how requests were handled. We then look at how the SOTF resolved complaints brought to them by petitioners who alleged that City bodies had violated the Sunshine Ordinance. We use public documents produced by the SOTF to analyze the timeliness, efficiency and outcomes of the complaint resolution process. We next address some of the practical and policy problems raised by the law in 2023, along with their potential solutions. We conclude with a summary of what we know about how the Sunshine Ordinance operated in 2023 and some suggestions for improvement.

San Francisco’s Public Records Requests and Responses

We surveyed San Francisco administrative bodies on their reception and handling of public records requests for the 2023 year. Surveys were sent to 133 administrative bodies potentially falling under the jurisdiction of the Sunshine Ordinance. While the Ordinance applies to City “policy bodies” and “passive meeting bodies,” there is no definitive list of which bodies fall under this designation. Under Section 67.3(d) of the Ordinance, policy bodies include the Board of Supervisors (BoS), bodies the BoS creates by ordinance or resolution, those listed in the City Charter, those created by another policy body, and those whose members are appointed by City officials, employees or agents. Under Section 67.3(c), passive meeting bodies include: advisory committees created by policy bodies, the Mayor, or department heads; groups that discuss or advise the mayor on fiscal, economic or policy issues; occasions to which the majority of policy

body members are invited; and bodies that review or make policy related to public health, safety, welfare and homelessness. To be as inclusive as possible, we sent survey invitations to all local government bodies identified by government sources, including the Office of the City Attorney, San Francisco’s sf.gov website, and the City Charter.

An introductory email, along with a link to a short survey, was sent to public records contacts at each body in February of 2024. The text of the survey is reprinted in Appendix A. The survey asked City administrative bodies for:

- the number of records requests received
- the number of requests they fulfilled
- the number of requests referred to another body for fulfillment
- the number of requests requiring information redaction
- the mean average number of days required to fulfill 2023 records requests

Recipients were asked to supply information related to public records requests for the 2023 year only and to leave blank any fields for which they did not have answers. They were given three weeks to complete the survey.

Eighty-two of the 133 survey recipients responded to our survey request, constituting a 62% survey response rate. In several cases, individual responses represented multiple affiliated or subsidiary bodies. A list of administrative bodies that completed the survey, and those that did not, appears in Appendix B.

Number of Requests Received by SF Administrative Bodies

Our survey respondents reported receiving a total of 49,507 public records requests in 2023. The number of requests received by administrative bodies was highly varied, as evidenced in the below table of the 10 bodies with the highest number of requests (Table 1).

Administrative Bodies	2023 Records Requests
San Francisco Police Department - Legal and CISU units	42,322
San Francisco Public Works	1452
San Francisco Sheriff's Office	1,198
San Francisco Department of Building Inspection	740
Residential Rent Stabilization and Arbitration Board	580
San Francisco Animal Care and Control	387
San Francisco International Airport	347
Controller's Office & subsidiary bodies	334
Department of Human Resources	200
Department of Police Accountability	200

Table 1: Administrative Bodies with the Most Records Requests Reported 2023

The three bodies reporting by far the most requests were the Legal and Crime Information Services Units of the San Francisco Police Department with 42,322 requests, the San Francisco Public Works department with 1,452 requests, and the San Francisco Sheriff's Office with 1,198 requests. Forty-eight bodies reported receiving between 1 and 161 requests. Twenty-two bodies reported receiving no requests, and 2 bodies did not know how many requests they received. The mean average of all requests received among the 82 bodies was 619, and the median was 7.5. However, if we remove the 3 bodies receiving the most requests, the mean average drops to 59 and the median to 6.

These self-reported numbers provide a partial and imperfect account of the number of requests received by all San Francisco bodies in 2023. The overall number of requests was certainly higher. NextRequest reporting for 2023, covering Jan 1, 2023-Jan 9, 2024, shows an additional 4499 requests were submitted to several bodies that did not take our survey. NextRequest is an online records request portals used by some, but not all, San Francisco administrative bodies. NextRequest reporting shows that 2,316 requests were received by the San Francisco Municipal Transportation Association and its subsidiaries; 933, by the Public Utilities Commission and its subsidiaries; 833, by the Fire Department; and 284, by the Treasurer and Tax Collector. Since these bodies did not necessarily receive or process all their requests through NextRequest, this number likely underrepresents the total number of requests they received. However, adding these numbers to those obtained by our survey, it appears that San Francisco received at least 54,006 public records requests in 2023, 78% of which were submitted to the Police Department.

Information Provided, Requests Referred, and Information Redacted

The survey also asked respondents how often they were able to provide requested records, how often they referred requesters to other bodies for answers, and how often they redacted information when providing responsive records. Overall, the bodies indicated that they were able to fulfill requests for information 86% of the time, or for approximately 42,257 of the 49,507 requests received. We should note that records may have been withheld for various reasons, such as exemptions specified in both the Sunshine Ordinance and the California Public Records Act. Respondents also reported forwarding requests to other bodies to fulfill in 598, or about 1.2%, of cases. In 2,576 of cases, or roughly 5%, bodies reported that they redacted or withheld information from the documents provided.

Average Time Taken to Fulfill Requests

Respondents were also asked the average number of days it took to fulfill individual public records requests in 2023. Under the Sunshine Ordinance, administrative bodies must respond to records requests within 10 days, though exceptions exist for "voluminous" requests, records that are stored remotely, or requests that require consultations with other bodies (§ 67.25(b) & 67.25(d)). The survey indicated that most bodies met these deadlines. The mean average time to fulfill a request was 10 days, with a median of 7 days. In addition, more than one body noted that a few difficult or time-consuming requests may have raised these averages significantly.

NextRequest reporting which covered some, but not all, of the same bodies showed a mean average fulfillment time of 20 days and a median of 8 days.

Summary of SOTF Survey Results

In sum, our survey results and NextRequest reporting showed that San Francisco administrative bodies received 54,006 records requests in 2023. This number represents a partial accounting of the total number of records requests received, since we did not have data for all bodies. Requests received by the Legal and Crime Information Services Units of the Police Department dwarfed those received by other bodies, constituting 78% of the total number of requests. SFPD requests included incident reports, evidence documents, data requests, body worn camera requests, civil discovery requests and other police documents (C. Beauchamp, Personal Communication, March 18, 2024). Our survey data also showed that administrative bodies were able to fulfill requests 86% of the time and forwarded requests to other bodies to fulfill in 1.2% of cases. Our data does not capture the status of the remaining records requests, which may have been withdrawn, denied or in the process of fulfillment. According to our survey, the mean and median time it took to fulfill records requests fell within the 10-day limit set by the Sunshine Ordinance, though NextRequest data suggested somewhat longer fulfillment times. However, longer fulfillment times do not necessarily indicate a failure to comply with the law, since voluminous or complicated requests may result in staggered responses over an extended time period.

Our survey data is subject to some limitations that we want to acknowledge. First, the data is self-reported, which may have biased or otherwise affected some of the answers given. Second, some departments do not track their record request responses closely and were able to give only estimates or approximations of how these records were handled, or in 2 cases had no data to provide at all. Where rough estimates or percentages were given, we substituted a midpoint number in our calculations. Third, aside from NextRequest reporting, we were unable to verify or crosscheck much of the self-reported data through other means. Finally, we know little about the practices of bodies that did not respond, or how their responses might change our understanding of the overall environment of public records requests. For example, the number of records requests reported increased from nearly 14,000 in 2022 to over 54,000 in 2023, largely due to the addition of a single survey respondent, the Police Department.

SOTF Complaint Resolution

The Sunshine Ordinance gives recourse to petitioners who are denied access to requested public records. Petitioners may submit a complaint to the SOTF if they believe the Sunshine Ordinance has been violated. The Sunshine Ordinance give a timeframe in which the SOTF must resolve such complaints:

The person making the request may petition the Sunshine Task Force for a determination whether the record requested is public. The Sunshine Task Force shall inform the petitioner, as soon as possible and within 2 days after its next meeting but in no case later than 45 days from when a petition in writing is received, of its determination whether the record requested, or any part of the record requested, is public... Upon the determination that the record is public,

the Sunshine Task Force shall immediately order the custodian of the public record to comply with the person's request. (§ 67.21(e))

The Sunshine Ordinance envisions the Task Force making determinations on 67.21 complaints within 45 days of receiving them. While the Ordinance does not specify a resolution process, section 67.21(e) states that the SOTF may hold public hearings to help resolve cases:

Where requested by the petition, the Sunshine Task Force may conduct a public hearing concerning the records request denial. An authorized representative of the custodian of the public records requested shall attend any hearing and explain the basis for its decision to withhold the records requested.

While the Sunshine Ordinance mandates that 67.21 complaints be resolved within 45 days, the resolution process does not require that each complaint receive a hearing before the full Task Force.

Timeliness and Efficiency of Complaint Processing

This section of the report reviews how the complaint process functioned in 2023. How long did it take the SOTF to resolve complaints, and how many hearings were scheduled to determine whether violations had occurred? How many petitions was the SOTF able to process and how many remained unresolved at the year's end? We also looked at how often the SOTF supported petitioner allegations of Sunshine violations, and how the SOTF monitored compliance with their orders. We drew on SOTF meeting agendas and minutes, staff notes, orders of determination, administrator reports and complaint petitions to answer these questions. Because only the full SOTF can make definitive determinations at present, we focused exclusively on cases that were scheduled for hearing before the full SOTF.

A brief review of current complaint procedures will provide some background for our findings. The SOTF currently follows a 2-step process for resolving complaints. Petitioners who submit complaints first appear before a committee that determines whether the complaint falls under the SOTF's jurisdiction and the documents at issue are public. The committee also decides whether to send the complaint to the full Task Force for another hearing or for placement on a consent calendar accompanied by recommended violations. If the complaint is placed on the consent calendar, the full Task Force may adopt the committee's recommendations without a hearing or remove the complaint from the calendar for a future hearing. Currently, both petitioners and respondents (City administrative bodies) are required to appear at these hearings.

In 2023, the full SOTF met only 10 times since two of its monthly meetings had been canceled due to administrative error. The Task Force scheduled 49 complaints in total. Of the 49 cases, 37 were scheduled for a full hearing and 12 for the consent agenda. While most cases were new, 1 was a request for reconsideration and 7 were requests for compliance with previous orders. In addition, just 4 petitioners filed 23 of the 49 complaints scheduled, with 1 petitioner bringing 9 cases, another bringing 6, and 2 bringing 4 each.

None of the cases were heard within the 45-day timeframe mandated by the Ordinance (See Appendix C: Average Number of Days Between Petitions and Hearings). The mean average time between a complaint being filed and heard was 407 days. The median average was 449 days. In addition, the request for reconsideration of a previous ruling took place 622 days after it was filed.

Under the 2-step review process, cases come before the Task Force for a minimum of 2 hearings. However, administrative errors, as well as notification and attendance failures, resulted in some cases being scheduled more than twice. Complaints heard in 2023 came before the full SOTF and its committees a mean average of 2.5 times (See Appendix D: Table of Number of Hearings Per Complaint Scheduled in 2023). In total, the cases heard in 2023 were scheduled 64 times before the full SOTF and 57 times in committee. However, because not all of the 49 cases scheduled were definitively resolved, the average number of times these cases ultimately come before the SOTF may be slightly higher.

The SOTF also has a substantial backlog of cases awaiting resolution, though their numbers have shrunk since 2022. At the end of 2022, 187 complaints awaited hearing. By the end of 2023, 95 cases were still pending before the task force. This reduction was due in part to the dismissal of 79 complaints filed by one petitioner. Of the complaints remaining, 8 were submitted between 2019-2021, 23 were submitted in 2022, and 64 were submitted in 2023 (Administrator’s Report, Jan. 3, 2024). However, even with the reduced backlog, the Task Force continues to receive more complaints than it schedules for hearing each year (See Chart 1: New Petitions by Year).

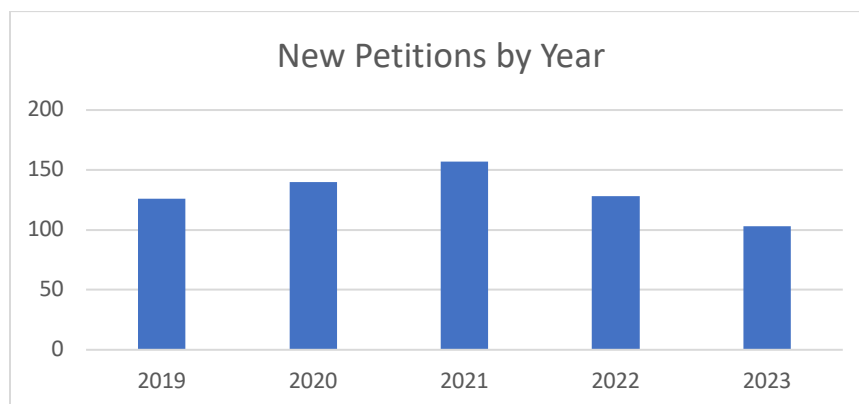


Chart 1: New Petitions by Year

In 2023, 103 new complaints were filed with the SOTF (C. Leger, personal communication, Jan 4, 2024). This number represents less than .2% of all records requests made during the 2023 year. Over the past 5 years, the number of new complaints received is about double the number the Task Force typically processes in 1 year under current procedures.

SOTF Determinations on Complaints and Violations

This section looks at how the SOTF resolved complaints and how often it supported petitioner claims that City officials had violated the Sunshine Ordinance. SOTF rulings in favor of petitioners are a general, though imperfect, indicator of how well the Task Force supports

Sunshine rights, since not all claims against City bodies are valid. In 2023, the SOTF ruled for petitioners in 23 cases and against them in 13 cases for which no violation was found. Ten of the “no violation” cases were filed by just 3 petitioners. The remaining 12 cases received no ruling. They were either withdrawn by petitioners, tabled due to petitioner absences, sent back to committee, or continued. In 7 cases, the Task Force was asked to determine whether a City body had complied with a previous SOTF order to release records. The Task Force sided with petitioners in 5 of these cases and referred 1 to San Francisco’s Ethics Commission for noncompliance. Among the 12 cases on the consent calendar, the SOTF accepted the committees’ recommendations in all but one, which was removed from the consent agenda for a future hearing. All 12 cases involved the late provision of records or requests for officials’ calendars.

We also compared the violations alleged by petitioners with those found by the task force. In 2023, the Task Force deliberated over 59 new alleged violations across 36 cases. The most common allegations, accounting for more than half of the total, included failure to provide records in a complete or timely manner, failure to respond to an immediate disclosure request in a complete or timely manner, and failure to provide an official’s calendar within 3 days.

The SOTF found 35 violations in total, supporting petitioner allegations 59% of the time (See Table 2).

Section	Violations Found	Description
67.21b	6	failing to provide records in timely/complete manner
67.29-5	6	failing to respond to Prop-G request in timely/complete manner
67.25	4	failing to respond to IDR in timely manner
67.26	4	failing to key redactions and perform minimal withholding
67.21e	4	failing to send knowledgeable authorized representative to hearing
67.21	2	failing to provide records timely manner
67.21c	2	failure to assist requestor
67.27	1	failing to provide justification for withholding of exemptions
67.15a	1	failing to provide public opportunities to address body
67.27a	1	failing to justify withholding
67.7a	1	failing to post agenda timely and with adequate descriptions
67.7b	1	failing to post agenda timely and with adequate descriptions
CPRA 54954.2a1	1	failing to provide 72-hour notice before meeting
CPRA 6253b	1	failing to provide timely/complete records

Table 2: Violations Found by SOTF 2023

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The most common violations included 14 failures to provide records in a timely manner, 6 failures to respond to a request for an official's calendar, 4 failures to respond to an immediate disclosure request in a timely manner, 4 failures to explain redactions and perform minimal withholding, and 4 failures to send an authorized representative to an SOTF hearing. At least half of the violations related to timeliness.

Summary of SOTF Complaint Resolution

Our review of the 2023 complaint resolution process shows that the SOTF supported petitioners' allegations the majority of time. As in 2022, petitions continued to come before the SOTF an average of 2.5 times. However, the time petitioners waited for their cases to be resolved increased from a mean average of 184 days in 2022 to 407 days in 2023. Reasons for the increased delay may have included administrative error, petitioner absences at scheduled hearings, the cancellation of 2 full SOTF meetings, and the higher number of cases scheduled for compliance reviews. In addition, 4 petitioners dominated the hearing process, accounting for 23 of the petitions scheduled. In 10 of those cases, the SOTF found no violations. As in 2022, in 2023 the Task Force received more than twice as many petitions as it typically schedules in a year.

Practical and Policy Problems Raised in 2023

This section discusses problems encountered with Sunshine Ordinance administration or compliance that the Task Force agreed raised matters of public concern.

The Use of "Private" Email Accounts to Conduct Public Business

When City officials discuss public business over communication channels, such as electronic mail and text messaging applications, these communications become public records subject to disclosure. However, while San Francisco assigns many City officials a government email address for the conduct of public business, others are left to do public business over personal email accounts. For example, members of the Redistricting Task Force and the Sunshine Ordinance Task Force do not receive City email addresses. The conduct of public business over personal email accounts creates two problems. First, City bodies may fail to offer the public a direct way to reach public officials due to privacy concerns raised by the disclosure of personal email accounts. Second, City actors have no ability to retrieve public records generated over a personal email account if an individual fails to provide them.

In 2023, the San Francisco Public Library (SFPL) refused to provide the email addresses of Library Commissioners to members of the public, citing privacy concerns (Complaint File #21165, heard 5/3/23). The SFPL justified its decision by citing San Francisco's *Good Government Guide*, which advises that the City not share private emails of City employees or officials with the public. The *Guide* (2021, p. 113) states, "Because of the right to privacy, as a general rule the City may not disclose personal contact information about employees such as home address, telephone numbers, or personal e-mail address..." In addition, the California Government Code states that the personal contact information of employees is not a public record, unless used by an employee to conduct public business (California Gov't Code Sections

6254.3(a) & 6254.3(b)(1)). Because the Library had not assigned government email addresses to Library Commissioners and did not share Commissioners' "private" email addresses with the public, the public had no direct way to reach these public officials.

Both the City and a recent California Supreme Court case (*City of San Jose v. Superior Court of Santa Clara*, 2017) recognize that public business conducted over personal email accounts constitutes disclosable public records. However, the City cannot access or maintain records held in personal email accounts. If an official using a "private" email address does not respond to a request for records, the City has no means to retrieve those records. The SOTF encountered this problem in 2022, when the City could not retrieve public records contained on the email systems and cell phones of Redistricting Task Force members who did not respond to public records requests (Complaint File #22007, heard 5/3/23).

The City could solve this problem by assigning City email addresses to all public officials. In a letter sent to the Board of Supervisors in 2023, the SOTF implored the City to adopt this practice. Assigning public officials public email accounts would provide the public with a way to reach officials directly and ensure that public records remained within the City's possession for the purposes of maintenance and retrieval.

Record Retention Across Electronic Communication Platforms

California law requires that the City keep records that are subject to record retention policies for a minimum of 2 years (Govt Code Section 34090). According to the *Good Government Guide* (2021), records retention policies are designed to preserve important records for appropriate time periods and to prevent the retention of unnecessary records and associated storage costs. City departments are also instructed to develop written policies specifying what records they will maintain and for how long. While the *Guide* counts email and other electronic communication as records, it also states that much of this communication may be exempt from City records retention policies. The *Guide* (p. 128) notes:

For the purpose of records retention law, the term "records" is defined much more narrowly than in the Public Records Act. In the retention context, "records" means any paper, book, photograph, film, sound recording, map, drawing, or other document, or any copy, made or received by the department in connection with the transaction of public business and retained by the department (1) as evidence of the department's activities, (2) for the information contained in it, or (3) to protect the legal or financial rights of the City or of persons directly affected by the activities of the City. Admin. Code § 8.1.

While communication increasingly takes place over email, group chat and text messaging, current City policy offers minimal guidance on how long to retain these records, and administrative bodies set their own retention policies.

In a complaint against the Department of Public Health (Complaint file #22012, heard 10/4/23), a petitioner requested documents from the DPH including all chats and text messages from the last 90 days. However, as a matter of policy, the DPH retained MS Team chat messages for only

30 days and did not retain any MS Team posts. As a result, most of the records requested were unavailable. While the Sunshine Ordinance requires that administrative bodies cannot dispose of any records after receiving a public records request for them, the swift disposal of communication on some electronic platforms makes retrieval of those records unlikely.

The SOTF recommends that the City consider the application of records retention policies to all communication software, including email, text messaging and web conferencing. Currently, there is no minimum amount of time these records must be retained. The City should explore maintaining these records for the maximum time feasible with regard to any storage costs.

The Need for Better Handling Immediate Disclosure Requests

Fourteen of the 49 complaints scheduled before the SOTF in 2023 concerned Immediate Disclosure Requests (IDRs). Under the Sunshine Ordinance (§ 67.25), petitioners may designate a records request as an IDR by writing “Immediate Disclosure Request” at the top, as well as “on the envelope, subject line, or cover sheet in which the request is transmitted.” An IDR must be answered by the end of the business day following the day on which it was received. However, the Ordinance also states that the maximum 10-day deadline is “appropriate for more extensive or demanding requests, but shall not be used to delay fulfilling a simple, routine or readily answerable request” (§ 67.25(a)). Although City bodies must acknowledge IDRs within one business day, they may take longer to fulfill some requests, including providing responses on a rolling basis as they become available beyond the 10-day deadline. The process for submitting an IDR is otherwise identical to a regular request for records. Petitioners may submit an IDR in any form of written or oral communication to anyone having custody of information or records.

The Ordinance does not specify, other than obliquely, what types of requests might constitute IDRs. Many City bodies, on the advice of the *Good Government Guide* (p. 101), presume that unless an IDR is simple, routine and easily answered, they may treat it as a regular request subject to a 10-day turnaround time and may release records on a rolling basis. SOTF members themselves have disagreed on the question of what constitutes an IDR, with some asserting that the designation is meant for simple requests and others that it may apply to any request, however extensive or demanding. The frequent use of IDRs by some petitioners, including for time-consuming requests that involve the provision of hundreds of documents, has resulted in multiple complaints before the Task Force.

Another problem with current practice is that IDRs, like all other Sunshine requests, can be submitted to any City employee, including volunteers, part-time workers and those on leave or vacation. While City bodies may specify a preferred address or submission method, petitioners are not obligated to follow this advice. The result may be that their requests are not seen in time to meet IDR deadlines. In one exemplary case, a petitioner (Complaint file #20008, heard 11/21/23) submitted an IDR to a staff member in the City Attorney’s Office requesting court documents related to a legal case in which they were involved. The petitioner chose to ignore online instructions and subsequent entreaties to submit their records request to a particular email address. The request, which also required a review of responsive documents for possible redactions, landed in the employee’s spam filter. The City did not, and indeed could not, meet the

1-day response deadline. This case was one of many extensive or demanding IDR requests that came before the Task Force.

Lack of clarity about what constitutes an IDR and, perhaps more importantly, the inability to direct requesters on where to submit IDRs can create problematic expectations on the part of requesters, prevent requesters from receiving their information on time, lead to a greater number of complaints before the Task Force, and result in more Sunshine Ordinance violations. Future revisions of the Sunshine Ordinance should clarify whether IDRs can apply to all requests or only to those that are simple, routine and easily answerable. Any amendments should also allow City bodies to specify a designated submission address for IDRs, since these requests require daily monitoring and an expedited response. In the meantime, City officials should consider using the “auto-reply” function on their email that alerts potential requesters when they are not checking accounts daily and specifying alternative ways to submit IDRs.

Law Enforcement Agencies May Now Only Withhold Officer-Related Records (Misconduct, Lethal Force) if They Can Determine that an Exemption Does Not “Directly Conflict” with the New Broad Disclosure Obligations of Penal Code Section 832.7

A second decision of the California Court of Appeal about the impact of Assembly Bill (“AB”) 1421 on other state law exemptions to public records requests was handed down at the end of December of 2023. AB 1421 was a highly publicized measure signed by the Governor in 2018 that broadened the public’s access to law enforcement officer-related case records, including certain personnel and lethal force case files. An earlier case, Becerra v. Superior Court, 44 Cal.App.5th (2020) had declared that these new provisions might supersede any exemptions contained in the California Public Records Act or other state laws that are in “direct conflict.” The Becerra Court analyzed Government Code Section 6255, commonly known as the “catchall exemption,” concluding that because the two laws “are reasonably harmonized”, there was no “irreconcilable conflict in the simultaneous operation of these provisions.” Becerra, at 929.

So what is a “direct conflict”? We now have some examples. The California Court of Appeal in First Amendment Coalition v. Bonta, (C.A. Cal. 1st Dist. Dec. 28, 2023) (“FAC”) followed up on the Becerra decision and found a direct conflict with the statute governing subpoenaed records [Government Code section 11183], so that provision is overridden by 832.7. The conflict is irreconcilable for “at minimum, those exemptions like section 832(a) and Government Code section 7923.600 that would ‘nullify’ its application to a wide swath of officer-related records.”

The FAC decision should have a significant impact on other claims of exemption. A custodian of law enforcement records now cannot merely look to the customary list of exemptions contained in other state statutes to justify nondisclosure. They will be required to assess any exemption under FAC and Becerra, and to assess whether an exemption recognized by the CPRA is in direct/irreconcilable conflict with the new provisions of Section 832.7.

The City’s Legal Obligations to Obtain Public Records Held by Employees and Private Contractors in Off-Site Locations or Personal Accounts

The SOTF often encounters the “constructive possession” rule highlighted in Community Youth Athletic Center v. National City, 220 Cal.App.4th 1385 (2013), and when it may encompass public records that might be held by City subcontractors such as the Corporation for the Fine Arts Museum, Conard House, and the SF Parks Alliance, to name just a few recent examples. California courts have recently been refining the extent to which a CPRA request can obligate a city department to at minimum make “reasonable” inquiry and efforts to ascertain where public documents might exist in “private” locations.

To establish an agency has a duty to disclose under Government Code section 6253, subdivision c [now 7922.535], the petitioner must show that: (1) the record qualifies as a **public** record within the meaning of section 6252, subsection (e) [now 7920.530] and (2) was in the actual **or constructive possession** of the agency. See Anderson-Barker v. Superior Court of L.A. Cnty., 31 Cal.App.5th 528, 538-9 (2022).

Records are public if they are sufficiently “owned, used or retained” by an agency or department. To be categorized as public, a record must relate in some substantive way to the conduct of the public’s business – generally not including communications that are purely personal with incidental mention of agency business. City of San Jose v. Superior Court of Santa Clara Cnty., 2 Cal.5th 608, 618-9 (2017). For example, where a City delegates its trash collection duty to serve residents through a contract, retains the power and duty to monitor performance, and relies on the disposal company’s financial data to approve rate increases, the data is a public record subject to disclosure. San Gabriel Tribune v. Superior Court, 143 Cal.App.3d 762, 775-6 (1983) (even assurances by the City of confidentiality do not alter public nature.)

Notably, the Supreme Court in City of San Jose decided that public employees who have private communications stored on [or accessed through] their personal accounts [or electronic devices] may also have certain records or communications that they were both preparing in their official roles, and were retaining, that pertain to their agency work and thus would qualify as public records. That Court decided that public agencies have certain duties in fulfilling their CPRA obligation to seek out, obtain, and produce public records that agency employees possess in personal accounts and access through their personal electronics devices. Id., 2 Cal.5th at 625-6.

Perhaps the second inquiry – Section 6253(c) [now 7922.535] constructive possession – can be more intricate. An agency has a legal obligation to search for, collect, and deliver responsive records in its possession. An agency has constructive possession if it has the **right to control** the records, either directly or through another person. Consolidated Irrigation v. Superior Court of Fresno County, 205 Cal.App.4th 697, 710-11 (2012). A Court will look to the nature of the relationship between a public entity and hired consultants, contractual rights and duties, and possible applicable regulations or law, emphasizing the nature of an agency’s right, if any, to “control” the files and records of the private consultant. Community Youth, 220 Cal.App.4th at 1426-7.

Where a consultant grants ownership, or “property rights” to their files, databases or other work product, and the consultant commits in writing to turn that information over at completion, the agency is deemed to constructively possess those materials – even if the agency does not fully assert all of those rights. Community Youth Athletic Center v. City of National City, 220

Cal.App.4th 1385 (2013) (City “had an ownership interest [and] the right to possess and control” the material.) In Community Youth, the Court determined that the consultant’s materials were therefore subject to disclosure under the CPRA, and the City’s obligations to respond to a CPRA request encompassed those consultant-held records. The Court found CPRA violations when the City “did not act reasonably in protecting the contractual rights to retain this material,” “gave up too soon and did not press the matter sufficiently,” and overall failed to make the requisite reasonable efforts that would be reasonably calculated to locate and obtain the consultant’s responsive documents. Id. at 1428-9.

In cases where a public agency does not retain that kind of right of control, there is no constructive possession and, correspondingly, no CPRA obligation to pursue a consultant’s written materials. For example, in Anderson-Barker v. Superior Court of L.A. Cnty., 31 Cal.App.5th 528 (2022), the Court found that though the consultant agreed to provide “unfettered access” to its data and materials, yet the agency did not actually exercise its’ access rights, there was simply not enough to constitute constructive possession without some form of ownership. That court noted the agency did not direct what information to place on the consultant’s databases and had no authority to modify the data. Id. at 541-2.

In Consolidated Irrigation, the consulting contract gave an ownership right over material “prepared by the Contractor.” The Court concluded this language was limited to the consultant and would not legally confer constructive possession of records of a separate private company who the consultant hired as a subcontractor. Id., 205 Cal.App.4th at 632-3 (implied finding no control.) Similarly, in Bd. of Pilot Comm’ers of the Bays of S.F., 218 Cal.App.4th 577 (2013), the partially public relationship between the governor-appointed Board of Pilot Commissioners for the Bays of San Francisco, San Pablo and Suisin, the Port Agent whose roles included both public duties and private work, and San Francisco Bar Pilots, a private association who allocated large ship piloting shift assignments, was too attenuated to justify a finding of constructive possession of Bar Pilots records of shift assignments and individual licensed pilot shift and rest-time durations, where (1) the statutes and regulations governing the relationship did not give the Board rights of **ownership** of records of Bar Pilots, and (2) Bar Pilots was not a **contractual** agent. Id. at 596-7. (Despite Port Agent dual role, publicly assigning shifts and reporting specified incidents pursuant to statute, appointed by majority of licensed shift pilots, and privately as a licensed ship pilot and as president of Bar Pilots, he never made use of or accessed specified Bar Pilots datasets sought by a shipping industry trade association.)

These obligations regarding CPRA coverage could potentially affect any document request submitted under the CPRA. The obligation to search for, collect, and deliver responsive records places on the responsible custodian the need to consider (1) where the requested public records might reside in the agency’s officials’ and employees’ personal accounts and devices (City of San Jose), and (2) which private consultants may be working pursuant to contracts that assign a right of control of requested consultant files, records or databases to the agency (see Community Youth). In satisfying CPRA requirements, a search will need to include not only making reasonable efforts to obtain agency documents, but also reasonable efforts to ascertain who else – agency employees, consultants – is reasonably likely to have access to privately-stored public records. Then, reasonable efforts will be necessary to locate and collect those other records to satisfy the CPRA’s standards.

The Difference between Permissive and Mandatory Obligations of the SOTF under California Law

The law in California explains the difference between “shall” and “may” in statute: Government Code section 14 provides “‘Shall’ is mandatory and ‘may’ is permissive.” In B.H. v. County of San Bernardino, 62 Cal.4th 168, 182-183 (2015), the California Supreme Court considered a law similar to Sunshine in its use of those same terms, and confirmed the law was mandatory/obligatory. Referring to the use of both the words “shall” and “may” in Penal Code section 11166, the Court stated, “These provisions indicate that the Legislature was aware of the difference between the two terms ‘shall’ and ‘may,’ using the term ‘shall’ to convey an obligatory requirement and ‘may’ to indicate a discretionary or permissive authorization.” B.H., 62 Cal.4th at 182-183. The Court determined the use of “shall” denotes “an obligatory procedure that a governmental entity is required to follow.” City of Santa Monica v. Gonzalez, 43 Cal.4th 905, 923 (2008). Faced with an obligatory procedure, a department “enjoys no discretion to refrain from complying with the dictates of the statute.” People v. McGee, 19 Cal.3d 948, 961 (1977).

In another similar case, the Court of Appeal in Matus v. Bd. of Administration, 177 Cal.App.4th 597 (2009) considered the importance of the time requirements in Government Code section 11517 to ensure an aggrieved party a hearing and decision within a reasonable time. “If these provisions were treated as directory rather than mandatory, this process becomes meaningless: an agency could simply delay a decision by deciding to hear the case on the record but not ordering a transcript of the proceedings. Such ‘administrative limbo’ is at odds with the purpose of the statute.” Matus, 177 Cal.App.4th at 610-611.

San Francisco’s Sunshine Ordinance imposes many of these mandatory obligations on departments and agencies across the City. It empowers the SO Task Force to review whether those “shall” obligations are being met. Voters also imposed a handful of mandatory obligations on the Task Force itself by explicit use of the “shall” imperative within provisions such as Administrative Code sections 67.21 and 67.30, and using the term “may” where the voters did not intend a mandatory obligation. Because all Task Force powers are derived from the Sunshine Ordinance, the SOTF simply cannot afford to pick and choose which mandatory duties it may wish to disregard.

Conclusion and Recommendations

This report sought to provide a data-driven account of Sunshine Ordinance administration and compliance for 2023. Our survey found that City administrative bodies handled upwards of 54,000 requests in 2023. The bodies reported that they were able to fulfill these requests within the 10-day deadline required by the Ordinance. However, NextRequest reporting showed an average fulfillment time of 20 days and a median fulfillment time of 8 days among bodies using that system to take or track requests. Our survey also found that bodies were able to fulfill data requests the majority of time, and only redacted or withheld information in about 5% of cases. Overall, we found that City bodies fulfilled information requests in a timely fashion, although

NextRequest data suggested that some bodies may have failed to meet fulfillment deadlines. As recommended previously, we encourage San Francisco to develop a system or template that can help City bodies manage Sunshine requests, as well as track and maintain more reliable data on the City's Sunshine activities.

The SOTF complaint resolution process has not been able to meet the 45-day turnaround time mandated by the Sunshine Ordinance, although the SOTF has remained a strong proponent of petitioner's Sunshine rights as evidenced by their favorable rulings for petitioners and their confirmations of alleged violations. In 2023, petitioners filing complaints generally came before the Task Force 2.5 times and waited an average of 407 days for a determination on their complaint. In addition, just a few petitioners monopolized the hearing process while others continued to wait for a hearing. For most, the complaint resolution process is neither timely nor efficient, raising the question of whether the SOTF should revise its procedures. If the Task Force seeks to resolve complaints within the 45 days specified by the Ordinance, it should carefully consider whether all cases require hearings to resolve, whether scheduling cases in committees before bringing them to the full Task Force holds sufficient value, whether to set time limits on hearings or their component elements, whether to limit the number of complaints a petitioner can file or the number of hearings they can receive in a given year, and whether to temporarily suspend petitioners who file multiple cases in which no violations are found. Reducing delays in hearing petitions, expanding the number of petitioners who come before the Task Force, and getting people information quickly should be among the highest priorities of the SOTF. More efficient and timely processes would ultimately reduce the time burdens currently placed on petitioners, the Task Force and the City, and provide access to information while it still holds value for those requesting it.

Recent Task Force initiatives to improve internal processes include the creation of a consent calendar and a fast track for cases involving timeliness violations. The consent calendar allows the full Task Force to make determinations on straightforward cases, or those in which the City does not contest alleged violations, on the recommendation of a committee. The Task Force can pull cases from the consent calendar for a full hearing or review and endorse committee recommendations without a second hearing. As noted earlier, roughly a quarter of the cases heard in 2023 were consent calendar cases. In April of 2024, the Task Force also created a process to expedite hearings and decisions on cases involving section 67.219(b) timeliness violations. The process aims to reach decisions on such cases within the 45 days mandated by the Ordinance.

Finally, this report highlighted various problems that became apparent in overseeing the Sunshine Ordinance in 2023. These included problems that arose when public officials used personal email to conduct public business, from the lack of record retention policies for communication over electronic platforms, and in meeting Sunshine Ordinance deadlines for IDRs given disagreements over what constitutes an IDR and the inability to specify a designated recipient. We also looked at the evolution of law around some key issues faced by the SOTF. These included changing laws around the disclosure of police officer-related records, and records in the possession of employees or private contractors. Lastly, we alerted the SOTF to the obligatory, as opposed to the discretionary, provisions of the Sunshine Ordinance as a touchpoint for assessing the performance of its obligations under the law.

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Appendix A

Text of Sunshine Survey

The Sunshine Ordinance Task Force (SOTF) requests that you provide information on the public records requests received and processed by your administrative body during the 2023 calendar year. Please answer the following questions to the best of your ability. If your body does not collect information that would enable you to answer a question, you may leave that question blank. The data you provide is public and subject to the terms & conditions stated on the Google Forms platform. The Task Force will use your answers to create an overview of San Francisco Sunshine activity in 2023. If you have any questions, please email Laura Stein, SOTF Member, at Lstein.sotf@gmail.com.

- What is your name?
- What is your work phone number?
- What is your email address?
- For which body or bodies are you answering this survey?
- In 2023, how many public records requests did your agency or department receive?
- In 2023, how many public records requests were submitted to your department or agency on NextRequest or GovQA?
- In 2023, for how many public records requests were you able to provide the requested information?
- In 2023, for how many public records requests did you refer the requestor to another agency or department for the information sought?
- In 2023, for how many public records requests did you redact information in your response?
- What was the mean average time (total days spent ÷ number of requests) it took your body to fulfill a public records request in 2023?

Appendix B

Sunshine Survey Respondents and Non-respondents

Respondents

1. Adult Probation
2. Animal Care and Control
3. Arts Commission
4. Office of Assessor-Recorder
5. Board of Appeals
6. Child Support Services
7. Children Youth & Their Families & Children, Youth, and Their Families Oversight and Advisory Committee
8. Office of the City Administrator, Risk Management and Moscone Convention Facilities
9. Office of City Attorney
10. Controller's Office (includes Inclusionary Housing Technical Advisory Committee, Our City Our Home, Citizen's General Obligation Bond Oversight Committee, Treasury Oversight Committee, SF Finance Corp, EIFD, Refuse Rates Administration)
11. Convention Facilities Department
12. Department of Building Inspection & Building Inspection Commission
13. Department of Elections
14. Department of Emergency Management
15. Department of Police Accountability
16. Department of Technology & SFGovTV
17. District Attorney's Office
18. Elections Commission
19. Entertainment Commission
20. Environment Department
21. Ethics Commission
22. Fine Arts Museums Board of Trustees, Legion of Honor & the De Young Museum
23. Fire Commission
24. Homelessness and Supportive Housing, Capital Planning Committee & Office of Resilience and Capital Planning
25. Human Resources
26. Human Rights Commission
27. Human Services Agency, Human Services Commission, & Disability and Aging Services Commission
28. Juvenile Probation Department & Juvenile Probation Commission
29. Library Department & Commission
30. Office of Community Investment and Infrastructure, Commission on Community Investment and Infrastructure, Oversight Board, & Transbay Citizens Advisory Committee
31. Office of Contract Administration
32. Office of Economic and Workforce Development, Committee on City Workforce Alignment & Historic Preservation Fund
33. Office of the County Clerk

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34. Police Commission
35. Police Department (Legal & CISU units)
36. Public Works Department, Public Works Commission & Sanitation and Streets
37. Public Defender
38. Recreation & Park Department
39. Residential Rent Stabilization and Arbitration Board (Rent Board Commission)
40. San Francisco Health Service System
41. SF Department of Early Childhood
42. SF Employees' Retirement System & Retirement Board
43. SF International Airport & Airport Commission
44. SF Port
45. SF Zoo/SF Zoological Society
46. Sheriff's Office
47. Small Business Commission & Office of Small Business
48. SF County Transportation Authority
49. War Memorial & Performing Arts Center & War Memorial Board of Trustees
50. Youth Commission
51. Access Appeals Commission
52. Assessment Appeals Board
53. Board of Examiners
54. Children and Families Commission (First 5 San Francisco)
55. Citizen's Committee on Community Development
56. Immigrant Rights Commission
57. Sheriff's Dept Oversight Board and SDA Office of the Inspector General
58. SOMA Community Stabilization Fund Community Advisory Committee
59. Ballot Simplification Committee
60. Behavioral Health Commission
61. Cannabis Oversight Committee
62. Code Advisory Committee
63. Disability and Aging Services Advisory Council and DAS Commission
64. Commission of Animal Control and Welfare
65. Committee on Information Technology
66. Dignity Fund Oversight and Advisory Committee
67. Early Childhood Community Oversight and Advisory Committee
68. Housing Conservatorship Working Group
69. Housing Stability Fund Oversight Board
70. Juvenile Justice Coordinating Council
71. Market/Octavia Community Advisory Committee
72. Reentry Council & its 3 subcommittees (LPP, Direct Action, and Women 1st)
73. Shelter Monitoring Committee
74. South of Market Community Planning Advisory Committee
75. State Legislative Committee
76. Sugary Drinks Distributor Tax Advisory Committee
77. Sweatfree Procurement Advisory Group
78. Urban Forestry Council
79. Veterans' Affairs Commission

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80. San Francisco Health Authority, dba San Francisco Health Plan
81. Transbay Citizens Advisory Committee
82. Hunters Point Shipyard Citizens Advisory Committee

Non-respondents

1. Asian Art Commission & Museum
2. Board of Supervisors
3. Civil Service Commission
4. Department of Disability and Aging Services & Department of Disability and Aging Services Commission
5. Department of Public Health, the Health Commission & General Hospital
6. Environment Commission
7. Film SF & the Film Commission
8. Fire Department
9. Laguna Honda
10. Mayor's Office of Housing and Community Development
11. Municipal Transportation Agency (MTA) Board of Directors & Parking Authority Commission
12. Office of the Chief Medical Examiner
13. Office of the Mayor & Mayor's Office of Innovation
14. Planning Commission and Historic Preservation Commission
15. Public Utilities Commission
16. Recreation & Park Commission
17. SF City Clinic
18. SF Port Commission
19. Status of Women Commission
20. Treasure Island Development Authority
21. Treasurer and Tax Collector
22. Elections Task Force (Redistricting Task Force)
23. Health Service Board
24. Our Children Our Families Council
25. Public Utilities Commission Rate Fairness Board
26. Retiree Health Care Trust Fund Board
27. Sunshine Ordinance Task Force
28. Treasure Island Development Authority Board of Directors
29. Workforce Investment San Francisco Board
30. Health Service Board
31. Bicycle Advisory Committee
32. Child Care Planning and Advisory Council
33. City Hall Preservation Advisory Committee
34. Committee on City Workforce Alignment
35. Community Corrections Partnership
36. Eastern Neighborhoods Community Advisory Committee
37. Family Violence Council
38. Food Security Task Force
39. Free City College Oversight Committee

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40. Municipal Green Building Task Force
41. Municipal Transportation Agency Citizens' Advisory Council
42. Park, Recreation, And Open Space Advisory Committee
43. Real Estate Fraud Prosecution Trust Fund Committee
44. Relocation Appeals Board
45. Single Room Occupancy (SRO) Task Force
46. Structural Advisory Committee
47. Treasure Island/Yerba Buena Island Citizens Advisory Board
48. Central Market and Tenderloin Area Citizen's Advisory Committee
49. Golden Gate Bridge Highway and Transportation District
50. Historic Preservation Fund Committee
51. Mayor's Office on Disability & Mayor's Disability Council

Appendix C

Average Number of Days Between Petitions and Hearings

File #	Date Petition Filed	Date SOTF Hearing Scheduled	Date Consent Agenda Vote Scheduled	Days from Petition to first scheduled SOTF hearing	Date Reconsideration Requested	Days from Reconsideration Petition to Hearing	Compliance Review Held Full SOTF
22018	3/4/22	2/1/23		335			
21128	9/29/21	2/1/23		490	10/4/23		7/25/23
21132	10/2/21	2/1/23		515			4/5/23
18086	11/14/18	2/1/23			5/21/21	622.0	
22131	11/4/22		2/1/23	89			
22110	9/26/22		2/1/23	129			
19140	12/16/19						3/1/23
21146	10/26/21	3/1/23		492			
20124	11/13/20		3/1/23	838			
22001	12/31/21	4/5/23		460			
22006	1/11/22	4/5/23		449			
22130	11/4/22		4/5/23	152			
23039	11/15/22	4/5/23		141			
21002	12/8/21	5/3/23		511			
22007	2/3/22	5/3/23		454			
21165	12/31/21	6/1/22					5/3/23
22010	2/14/22	5/3/23		443			10/4/23
22107	9/15/22		5/3/23	230			
22020	3/10/22	6/7/23		454			
22012	2/18/22	9/7/22					6/7/23
22015	2/21/22	6/7/23		471			
22023	3/8/22	6/7/23		456			
22022	3/15/22	6/7/23		449			
22125	10/27/22		6/7/23	223			
22132	11/4/22		7/25/23	263			
22133	11/4/22		7/25/23	263			
23033	3/13/23		7/25/23	134			
22082	6/27/22	7/25/23		393			
22080	7/14/22	7/25/23		376			

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21150	11/12/21	7/25/23		620			
22035	4/8/22	7/25/23		473			
22052	4/29/22	7/25/23		452			10/4/23
22054	5/3/22	8/22/23		476			
23051	5/14/23		9/6/23	115			
23052	5/10/23		9/6/23	120			
22112	10/6/22	9/6/23		335			
22141	11/14/22	9/6/23		296			
22031	4/4/22	9/6/23		520			
22032	4/4/22	9/6/23		520			
22117	10/7/22	9/6/23		335			
21140	10/12/21	10/4/23		722			
22045	4/19/22	10/4/23		533			
22046	4/19/22	10/4/23		533			
23080	9/5/23		11/1/23	57			
22057	5/3/22	11/1/23		547			
23002	1/10/23	11/1/23		296			
22114	10/11/22	11/1/23		386			
22119	10/27/22	11/1/23		370			
20008	1/14/20	11/1/23		1388			
MEAN				407		622	
MEDIAN				449		622	

Appendix D

Table of Number of Hearings Per Complaint Scheduled in 2023

File #	# reviews full SOTF	# hearings EOTC	# hearings CC	# hearings C&A
22018	1		1	
21128	5		1	
21132	3		1	
18086	5			2
22131	1		1	
22110	1		1	
19140	1		1	3
21146	1		1	
20124	1		1	
22001	1		1	
22006	1		1	
22130	1		1	
23039	1			
21002	1		1	
22007	1			1
21165	2		1	1
22010	3		2	1
22107	1		1	
22020	1		1	
22012	2	1		1
22015	1		1	
22023	1	1		
22022	1		1	
22125	1			1
22132	1		1	
22133	1		1	
23033	1			1
22082	1		1	
22080	1	1		
21150	1		1	
22035	1	1		

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22052	2	1		
22054	1		1	
23051	1		1	
23052	1		1	
22112	1		1	
22141	1		1	
22031	1		1	
22032	1		1	
22117	1		1	
21140	1		1	
22045	1		1	
22046	1		1	
23080	1		2	
22057	1			1
23002	1			1
22114	1		1	
22119	1		1	
20008	1		1	
Total	64	5	39	13
Total Average Per Petition 2.5				

EOTC- Education, Outreach and Training Committee

CC- Complaint Committee

C&A- Compliance and Amendments Committee

Appendix E

Task Force Members Serving in 2023

Dean Schmidt
Lila Lahood
Jaya Padmanabhan
Saul Sugarman
Jennifer Wong
Laura Stein
Matthew Yankee
Chris Hyland
David Pilpel
Thuan Thao Hill
Bruce Wolfe