

REPORT

CLC

ADVANCING
DEMOCRACY
THROUGH LAW

**TRAINING
UPGRADES
for ETHICS
COMMISSIONS**



ACKNOWLEDGMENTS

Thank you to the City of Atlanta Ethics Office, California Fair Political Practices Commission, District of Columbia Board of Ethics and Government Accountability, Hawai'i State Ethics Commission, Massachusetts State Ethics Commission, Missouri Ethics Commission, Nevada Commission on Ethics, New Jersey State Ethics Commission, New York City Conflicts of Interest Board, Ohio Ethics Commission, North Carolina State Ethics Commission, Pennsylvania State Ethics Commission, and Rhode Island Ethics Commission for participating in interviews to support this analysis.

This analysis was written by Kedric Payne, Delaney Marsco, and Danielle Caputo. Thank you to Kimberly Hall and Brendan Quinn for their feedback and to Eighty2degrees for designing the analysis.

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

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PURPOSE

The purpose of this CLC analysis is to provide state and local ethics commissions with innovative training upgrades to improve how they effectively implement their ethics programs. Specifically, the project highlights 10 proven training features that ethics commissions have used to increase:



1.
compliance with
ethics laws



2.
accessibility to the laws
and the work of the
ethics commissions



3.
knowledge of how
ethics laws apply

We interviewed 13 ethics commissions that exemplify at least one of the 10 features we highlight. This project focuses on upgrades that yield results yet are relatively simple and inexpensive to administer. Importantly, ethics commissions can adopt these improvements without creating any new laws, rules, or regulations.

EXECUTIVE SUMMARY

Ethics commissions serve a fundamental role in democracy by training vast government workforces on how to adhere to laws and rules intended to preserve the public's trust in government.

Limited staff, technology, and funding can create challenges for ethics commissions as they work to make sure every government official understands their obligations under the ethics laws. In addition, ethics commissions often have the complex duty of serving diverse stakeholders, including government officials and employees, lobbyists, government contractors, journalists, and the general public. All these groups, directly or indirectly, rely on ethics commissions to provide comprehensive and engaging training to public officials.

Ethics commissions praised CLC's past reports, *Top 10 Transparency Upgrades* and *Top 10 Enforcement Upgrades*, which provide best practices for engaging the public with the work of the ethics commission and enforcing laws under the ethics commission's purview, respectively. This new analysis,

Top 10 Training Upgrades, provides options for ethics commissions who want to enhance their training and education programs. CLC researched and interviewed state and local ethics commissions nationwide and identified the following 10 training upgrades:

1. Learning Management Software
2. Training in Lieu of Penalties
3. Livestreamed Training
4. Role-Specific Training
5. Inclusive Training Material
6. Ethics Liaisons
7. Ethics Site Visits
8. Expedited Advice
9. Expanded Social Media Outreach
10. Training Compliance Report

For each feature, the relevant ethics commissions provided practical insight on why they implemented the feature, the benefits, the resource costs, and lessons from their experience. Any ethics commission can improve its training programs by adopting any one of these tools.



INTRODUCTION

The Top 10 Training Upgrades are designed for ethics commissions interested in implementing innovative practices to improve compliance, accessibility, and knowledge of ethics laws.

Ethics commissions, as guardians of good government, must educate government employees about their responsibilities under the ethics laws. The public has a right to know that government officials are serving the public interest, and continuous improvement of training practices is necessary to reassure the public that their leaders understand their obligation to the public. This CLC analysis provides guidance for ethics commissions on possible upgrades to training and education practices.

Training public officials on the ethics laws of a state or municipality can be an immense challenge. Ethics commissions are often smaller agencies provided with limited funding, while the workforce they train can number in the tens of thousands of widely dispersed people. The complexity of the laws administered by

ethics commissions means trainings require a delicate balance: Ethics commissions must make the laws digestible and relevant to a workforce with greatly varying roles, without diluting the law so much that it loses meaning or heft. In addition, the requirements for whom must complete what kind of training, the technology available to ethics commissions, and the ethics laws themselves are always changing. While these challenges may present frustrations, they also can inspire new opportunities to enhance training and education practices.

Ethics commissions should be prepared to use all the tools at their disposal to ensure public officials are properly trained. Such efforts help ethics commissions build and maintain the public's trust. This review of state and local ethics commissions' best practices aims to demonstrate the innovations of ethics commissions, show the benefits of those innovations, and provide a road map for how ethics commissions can implement these measures to help ensure that those in public service work in the best interests of those they serve.

01

Learning Management Software

WHAT IS IT?

Learning management software (LMS) is a platform for ethics commissions to design and distribute on-demand ethics training courses virtually. LMS allows an ethics commission to track completion rates of training courses and gather additional metrics to improve effectiveness of training materials.

WHY IT MATTERS

LMS enables ethics commissions to create customizable, high-quality training courses that individuals can take whenever it is most convenient for them. This gives ethics commissions, which often have limited staff, the ability to train more people efficiently. Moreover, commissions can use LMS to see who has not completed required training and take appropriate action. LMS can easily show which questions are answered incorrectly, enabling commissions to further consider what subjects they need to clarify or where they should expand training.

BENEFITS



Compliance

Allows ethics commissions to effectively train individuals so that they better understand ethics laws



Accessibility

Creates an opportunity for individuals to take trainings wherever and whenever they have access to a computer or mobile device



Knowledge

Provides trainings that can be completed at an individual's own pace and that can be revisited, as necessary

District of Columbia Board of Ethics and Government Accountability

The District of Columbia Board of Ethics and Government Accountability began using its LMS in 2022 to provide ethics training for over 30,000 employees. The photo below depicts the overview of BEGA's conflicts of interest course.

The screenshot displays the LMS interface for the District of Columbia Board of Ethics and Government Accountability. The header includes the organization's logo and name. A dark blue sidebar on the left contains navigation options: HOME, MY QUEUE, CATALOG, HISTORY, Profile, Help, Settings, and Sign Out. The main content area is titled 'Module Overview' and features a course card for 'Conflicts of Interest: An Overview' (BGA909-a80en). The card includes a video player with a 'Next' button and a 'Course Video On/Off' toggle. Below the card, there is a detailed description of the course content and an optional test out capability.

Board of Ethics and Government Accountability

Hello, Ashley Cooks

Module Overview

Conflicts of Interest: An Overview
BGA909-a80en

Course Video On Course Video Off

Next

This course provides practical guidance on how to handle conflicts of interest in the workplace. Above all, it prioritizes the best interests of the government over personal gain. By following commonly encountered scenarios, users will learn how to identify real and potential conflicts of interests, and take steps to manage and report conflicts appropriately.

This course includes an optional test out capability. This feature may be used with one or all lessons in the course with the exception of the introductory and wrap up lessons. If the feature is selected, the learner has the option of answering the knowledge assessment questions for the lesson. If all the questions are answered correctly, the learner receives credit for completion and may move on to the next lesson in the course. If they do not answer all the questions correctly, they will need to

EXAMPLE

District of Columbia Board of Ethics
and Government Accountability

Summary of conversation with Ashley D. Cooks, Director of Government Ethics:



REASONS FOR IMPLEMENTING A LEARNING MANAGEMENT SOFTWARE

The Board of Ethics and Government Accountability (BEGA) wanted a more convenient and efficient way to train employees. Training 30,000 employees using 25 full-time employees was not feasible through in-person training and webinars alone. LMS gives employees the opportunity to take the courses at any time and as frequently as they desire in order to fully understand the material.



SUCCESS OF THE LEARNING MANAGEMENT SOFTWARE

Since implementing LMS in April 2022, BEGA has seen an increase in compliance. Additionally, BEGA has received more complaints, as employees began recognizing violations as a result of their training. By only having to create a training once, BEGA can focus more on publishing advisory opinions. From 2022 to 2023, BEGA has been able to double the number of advisory opinions it has issued. The data from its LMS also informs the focus of the advisory opinions.



IMPLEMENTATION COSTS

The implementation costs for LMS are expensive. The specific software BEGA uses for its LMS required the board to purchase licenses for each employee. However, some companies have license packages that decrease the cost. Other cost-saving measures include forgoing video content or using staff to provide voiceovers.

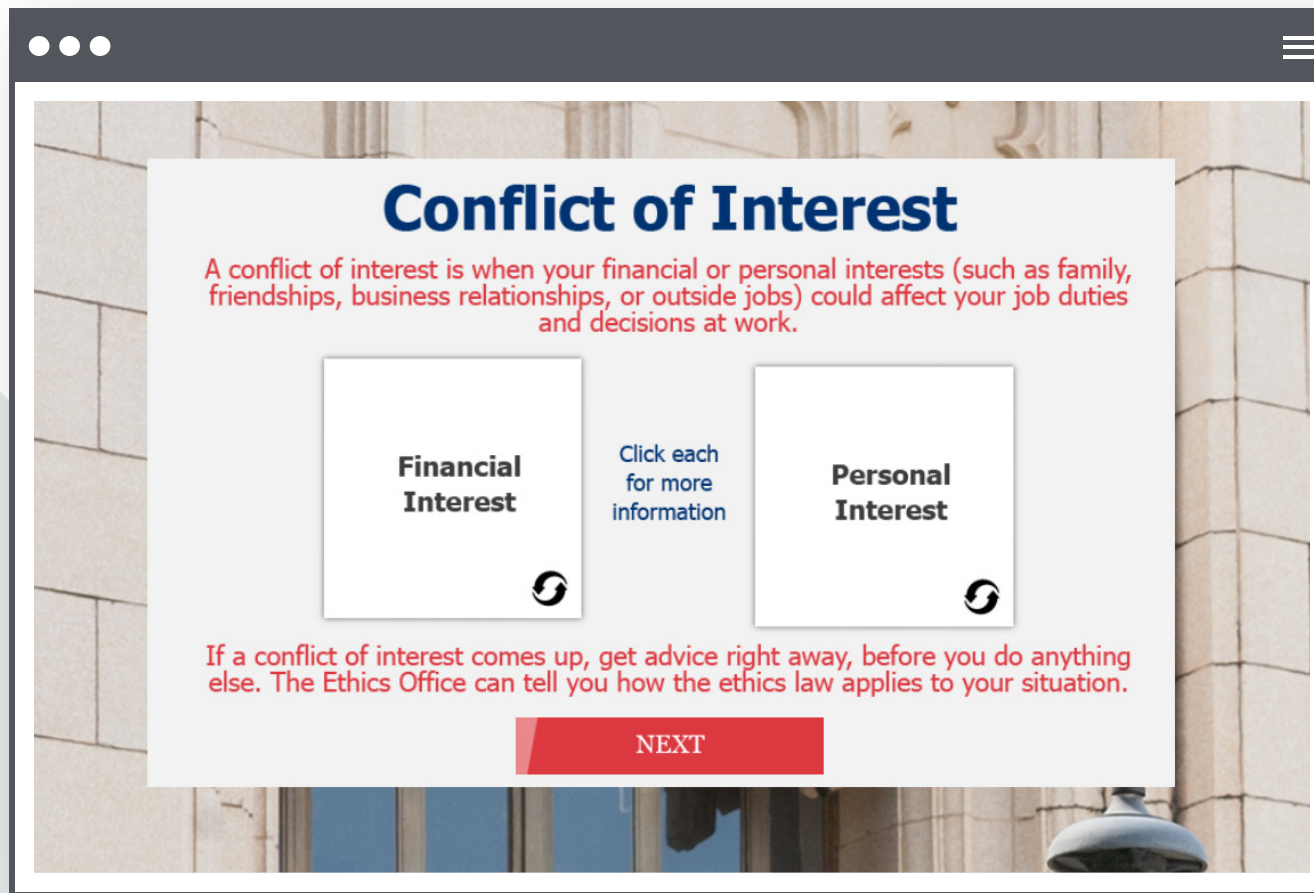


IMPLEMENTATION TIPS

BEGA recommends ethics commissions conduct internal research to determine whether there are other lower cost options, such as converting PowerPoints into video for trainings rather than paying to include video content. It suggests researching multiple LMS companies to determine which one works best for their commission.

City of Atlanta Ethics Office

The City of Atlanta Ethics Office uses an LMS that covers 12 different ethics topics. The photo below shows the topics the Ethics Office currently includes in its LMS.



Summary of conversation with Carlos R. Santiago, Deputy Ethics Officer, and Ibidapo S. Onabanjo, Ethics Advisor:



REASONS FOR IMPLEMENTING A LEARNING MANAGEMENT SOFTWARE

The City of Atlanta Ethics Office (Ethics Office) moved from in-house e-learning videos and quizzes to a learning relationship management system, a type of student-centric LMS. The purpose behind implementing LMS was to keep content fresh and engaging. With the adoption of the new system, users can choose content from a library of off-the-shelf videos and other materials and customize them for their own training needs.



SUCCESS OF THE LEARNING MANAGEMENT SOFTWARE

The Ethics Office's LMS can deploy training that makes the material more accessible and digestible, and it provides opportunities for those who have different learning styles. As a result, the Ethics Office has seen an uptick in advisory requests.



IMPLEMENTATION COSTS

Costs are moderate to expensive. The Ethics Office uses a third-party platform that requires payment of an annual license fee. Staff time is also needed to ensure there are people on staff who know how to use and operate the system.



IMPLEMENTATION TIPS

Ethics commissions should keep the audience of the trainings top of mind when deploying tools available in an LMS. Training courses should be both engaging and accurate. If necessary, commissions can employ a content writer who can make the training accessible to all skill levels or utilize staff in other agencies to provide different perspectives. Using an LMS is not necessarily one size fits all; in-house elements can be combined with vendor elements. Commissions should be aware of the limitations of an LMS system and understand that it is not a panacea for all training concerns; for example, not every employee under an ethics commission's jurisdiction may have access to the required technology.

02

Training in Lieu of Penalties

WHAT IS IT?

Training in lieu of penalties is an education program that allows those who commit minor violations of ethics laws to receive training rather than pay monetary penalties. Violators benefit from this program because they learn how to comply with the law, avoid a monetary penalty, and do not receive a blemish on their record.

WHY IT MATTERS

A training in lieu of penalties program provides individuals who are unfamiliar with applicable ethics laws the opportunity to understand their mistakes without penalty and to avoid repeat offenses. By training those individuals, ethics commissions can enhance education without deterring those new to the political system from participating (e.g., first-time candidate).

BENEFITS



Compliance

Incentivizes individuals to learn from their mistakes to avoid future monetary penalties



Accessibility

Provides individuals the unique opportunity to receive remedial training on the laws they do not understand

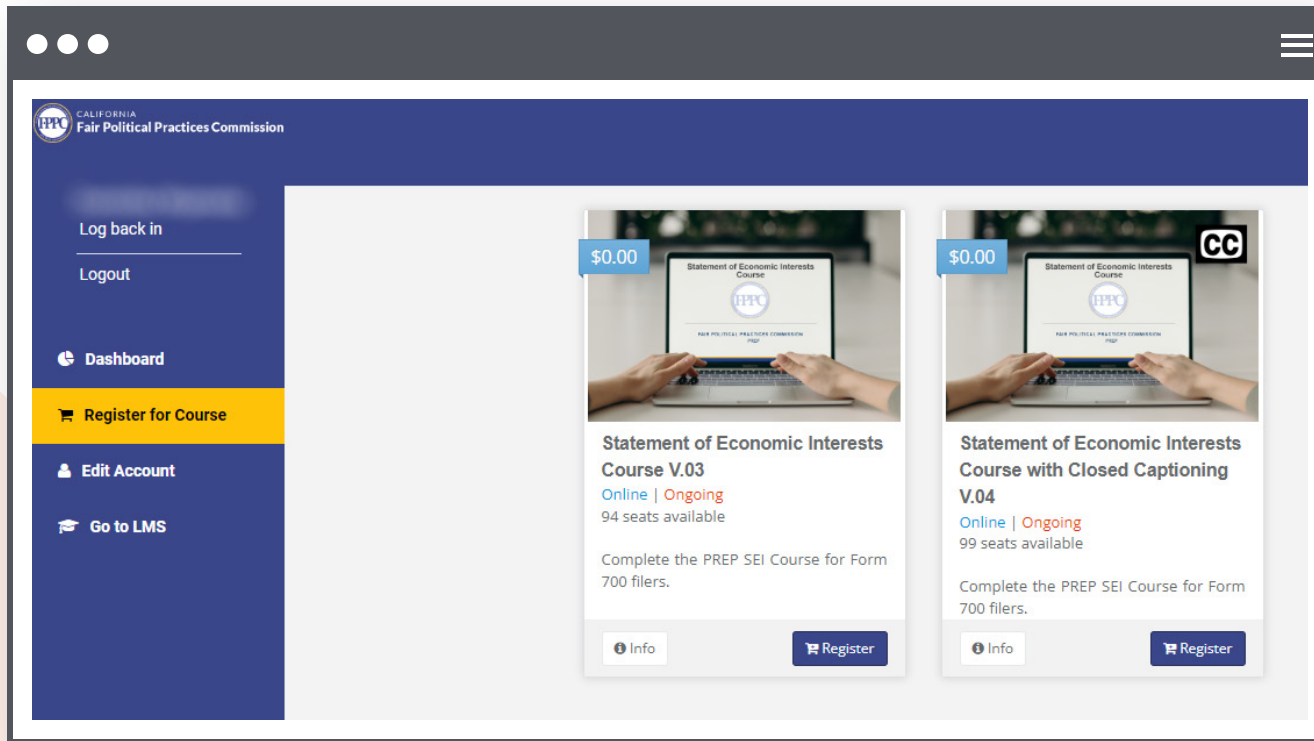


Knowledge

Enhances understanding of laws and rules that may be confusing rather than penalizing individuals for unintentional violations

California Fair Political Practices Commission

The California Fair Political Practices Commission offers an educational program called Political Reform Education Program (PREP) to allow those who commit violations of certain ethics laws to take a training course in lieu of paying penalties. Those courses are available online, as shown below.



The screenshot displays the California Fair Political Practices Commission (FPPC) website interface. The header includes the FPPC logo and the text "CALIFORNIA Fair Political Practices Commission". A navigation menu on the left contains links for "Log back in", "Logout", "Dashboard", "Register for Course" (highlighted in yellow), "Edit Account", and "Go to LMS". The main content area features two course cards, each with a "\$0.00" price tag and a "CC" icon. The first card is for "Statement of Economic Interests Course V.03", which is "Online | Ongoing" and has "94 seats available". The second card is for "Statement of Economic Interests Course with Closed Captioning V.04", which is also "Online | Ongoing" and has "99 seats available". Both cards include a description: "Complete the PREP SEI Course for Form 700 filers." and buttons for "Info" and "Register".

EXAMPLE

California Fair Political Practices Commission

Summary of conversation with Galena West, Executive Director, and Dominika Wojenska, Associate Governmental Program Analyst:



REASONS FOR IMPLEMENTING TRAINING IN LIEU OF PENALTIES

The California Fair Political Practices Commission (FPPC) first created a program to streamline violations after enforcement became over 70% of FPPC's workload. The Commission decided to include a pilot diversion program to further reduce enforcement matters. The purpose of the program, called the Political Reform Education Program (PREP), is to give respondents unfamiliar with the Political Reform Act an opportunity to learn how to comply with the law without receiving monetary penalties. FPPC did not want to discourage anyone from running for office, particularly individuals who may lose an election and then get fined for violating a rule. Instead, it wants people to learn more and then run again knowing the rules.



SUCCESS OF TRAINING IN LIEU OF PENALTIES

Since PREP was launched in June 2022, 96 people have registered. Of those people, only three did not complete the program and had to be sent back to the enforcement division. The course currently available for PREP, the statement of economic interest course, has a 96% success rate.



IMPLEMENTATION COSTS

The implementation of an education in lieu of penalties program is moderate. FPPC uses Blackboard, a software program, to host its trainings. To decrease the cost of creating the lessons, FPPC used staff to record the voiceovers. It has three staff dedicated to PREP but believes smaller agencies would probably not need more than one person on staff to manage the training program.



IMPLEMENTATION TIPS

Collecting feedback is an important tool in developing appropriate trainings. Additionally, while FPPC is currently in the process of making PREP permanent, it believes that many commissions could implement a training in lieu of penalty program through regulation and policy rather than through legislation.

03

Livestreamed Training

WHAT IS IT?

Livestreamed training is when ethics commissions host live trainings online. The livestream can be a hybrid of simultaneously in-person and online audiences or just online. During a livestreamed training, everyone can participate, whether they are physically present in the room where the training is taking place or not.

WHY IT MATTERS

Livestreamed training allows individuals who may not be able to commute to a training to still attend and participate. More people receive training at once, decreasing the number of trainings an ethics commission must host, while maximizing participation across the workforce. Livestreaming enables everyone to ask questions and be engaged in the training in real time.

BENEFITS



Compliance

Provides more opportunity for individuals to understand the ethics laws, making it more likely they will follow them



Accessibility

Allows those who may not be able to travel to a training to participate

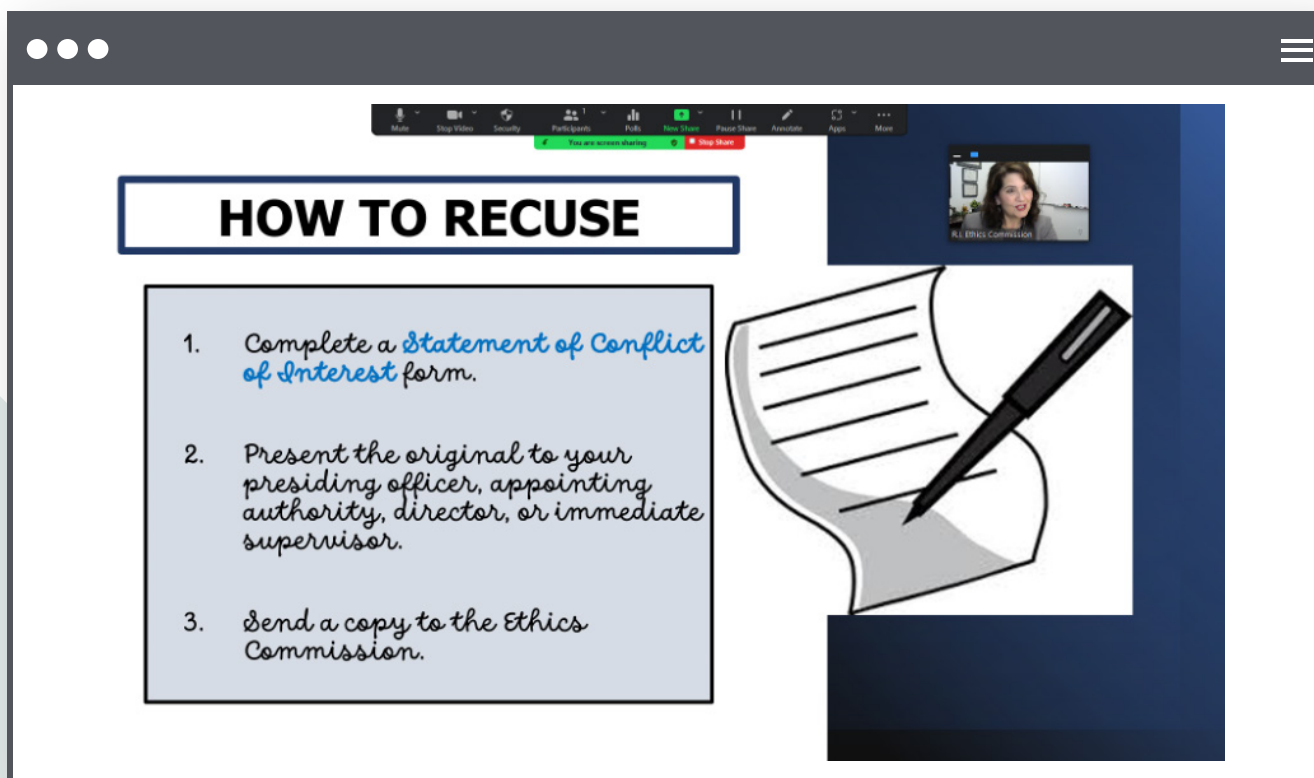


Knowledge

Broadens understanding of the ethics laws across more of the workforce

Rhode Island Ethics Commission

The Rhode Island Ethics Commission livestreams its ethics trainings over Zoom. The photo below depicts how a livestreamed training would look to an individual who is attending online.



Summary of conversation with Jason Gramitt, Executive Director and Chief Prosecutor:



REASONS FOR IMPLEMENTING LIVESTREAMED TRAINING

The Rhode Island Ethics Commission (RIEC) first developed online trainings shortly after the onset of the COVID-19 pandemic in 2020. It joined the video conferencing platform Zoom, initially to stream public meetings online, but immediately realized it could also use it to livestream trainings. As it was able to host trainings in person again, RIEC decided to offer hybrid trainings, where the training would be live, but individuals could attend in person or remotely.



SUCCESS OF LIVESTREAMED TRAINING

Livestreamed training has decreased the number of trainings RIEC has to offer.



IMPLEMENTATION COSTS

The cost of livestreamed training is moderate. To livestream a training, RIEC had to purchase cameras that it could place throughout the training room to capture all the angles and speakers, as well as microphones to capture live voices, and a projector or other large-screen television to capture video of remote participants.

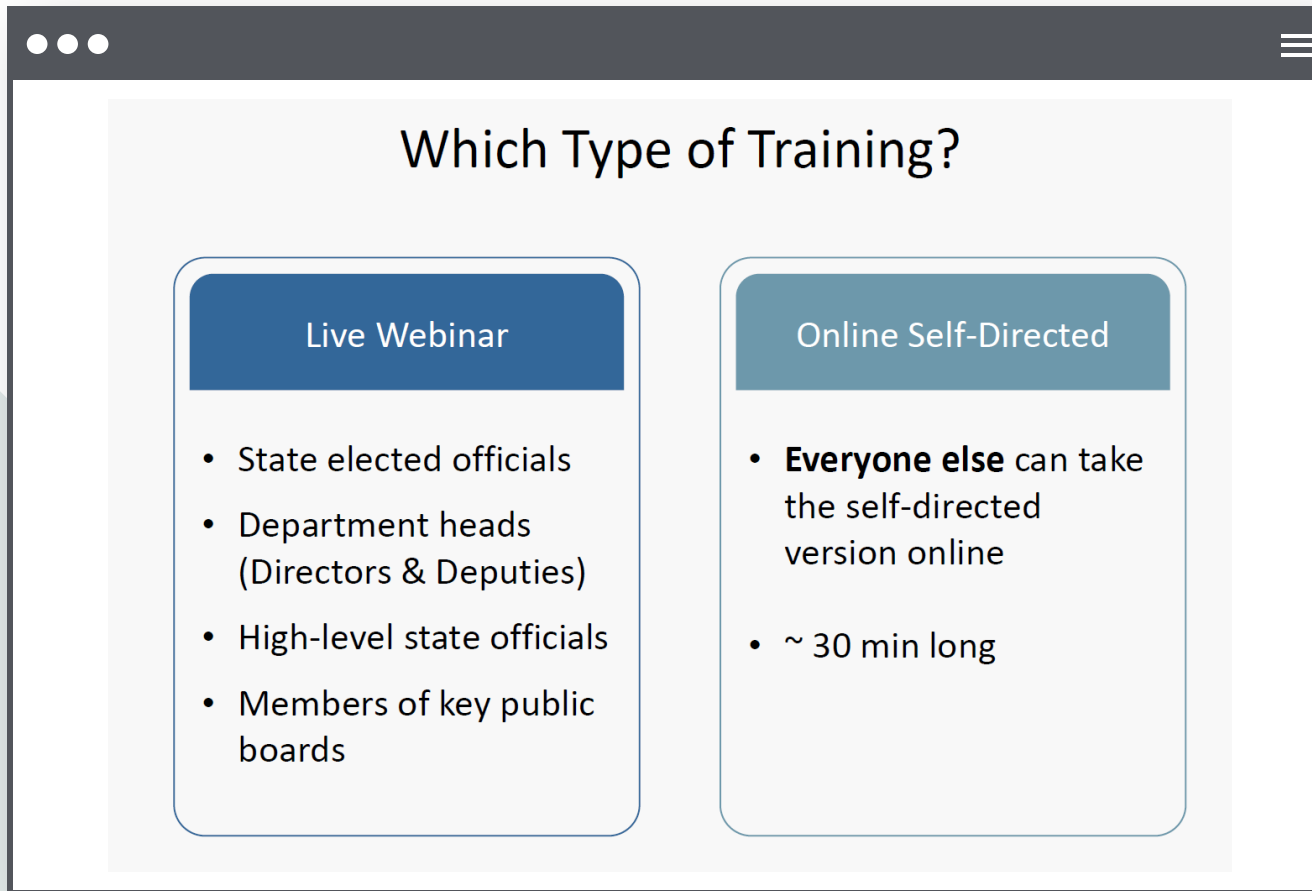


IMPLEMENTATION TIPS

RIEC recommends other ethics commissions initially offer a few livestreamed trainings, and then reflect on what went well and what needed improvement. This trial-and-error approach will help determine best practices.

Hawai'i State Ethics Commission

The Hawai'i State Ethics Commission offers livestreamed training for officials who must attend live ethics training. The photo below depicts which officials must attend the livestreamed training and which officials can take the online, self-directed version.



The screenshot shows a web page with a dark header containing three white dots on the left and a hamburger menu icon on the right. The main content area is titled "Which Type of Training?" and features two rounded rectangular boxes. The left box, titled "Live Webinar", lists four categories of officials. The right box, titled "Online Self-Directed", lists two bullet points.

Which Type of Training?

Live Webinar	Online Self-Directed
<ul style="list-style-type: none">• State elected officials• Department heads (Directors & Deputies)• High-level state officials• Members of key public boards	<ul style="list-style-type: none">• Everyone else can take the self-directed version online• ~ 30 min long

Summary of conversation with Robert D. Harris, Executive Director and General Counsel, and Bonita Y.M. Chang, Compliance Director:



REASONS FOR IMPLEMENTING LIVESTREAMED TRAINING

In January 2023, a law took effect requiring mandatory ethics education for all state employees. Specific officials must attend live ethics training to satisfy the requirement, so the Hawai'i State Ethics Commission (HSEC) began offering livestreamed webinar trainings in addition to its on-demand trainings.



SUCCESS OF LIVESTREAMED TRAINING

HSEC has found that the livestreamed webinar trainings facilitate more engagement and interaction than on-demand trainings, allowing for feedback in real time. It provides for a more direct connection with the trainees, despite being virtual. Since starting the webinars, HSEC has received positive feedback from participants and anecdotally has seen an increase in specific complaints, likely because employees are absorbing the training and recognizing more violations.



IMPLEMENTATION COSTS

The implementation cost of the livestreamed training for HSEC is low. HSEC was able to begin offering trainings via Zoom solely for the cost of the Zoom membership. For HSEC, it has reduced costs because the virtual trainings mean it is not required to travel to the various Hawai'iian islands to conduct trainings.



IMPLEMENTATION TIPS

Ethics commissions should strive for continuity across all types of training. Operating from a core slide deck or similar document and being cognizant of pacing and visuals are key to keeping virtual audiences both engaged and informed. Ethics commissions should also stay apprised of new developments in technology so they can use new tools to help optimize training.

04

Role-Specific Training

WHAT IS IT?

Role-specific training means training content tailored to specific roles. Role-specific training reflects actual scenarios that employees will encounter at their jobs, in addition to generalized training that applies to all employees, regardless of role.

WHY IT MATTERS

Ethics laws can be confusing when applied to specific roles in government. Role-specific training helps employees better understand how the law applies to their specific duties. This tailoring recognizes the unique contributions of each role in the government and shows employees that the ethics commission is attuned to each employee's compliance concerns. This not only aids in compliance but also fosters an environment of understanding and respect between the ethics commission and employees subject to the ethics laws.

BENEFITS



Compliance

Contextualizes the law through training exercises that closely resemble actual scenarios unique to the position



Accessibility

Makes commission activities and ethics laws relevant to all employees, regardless of position

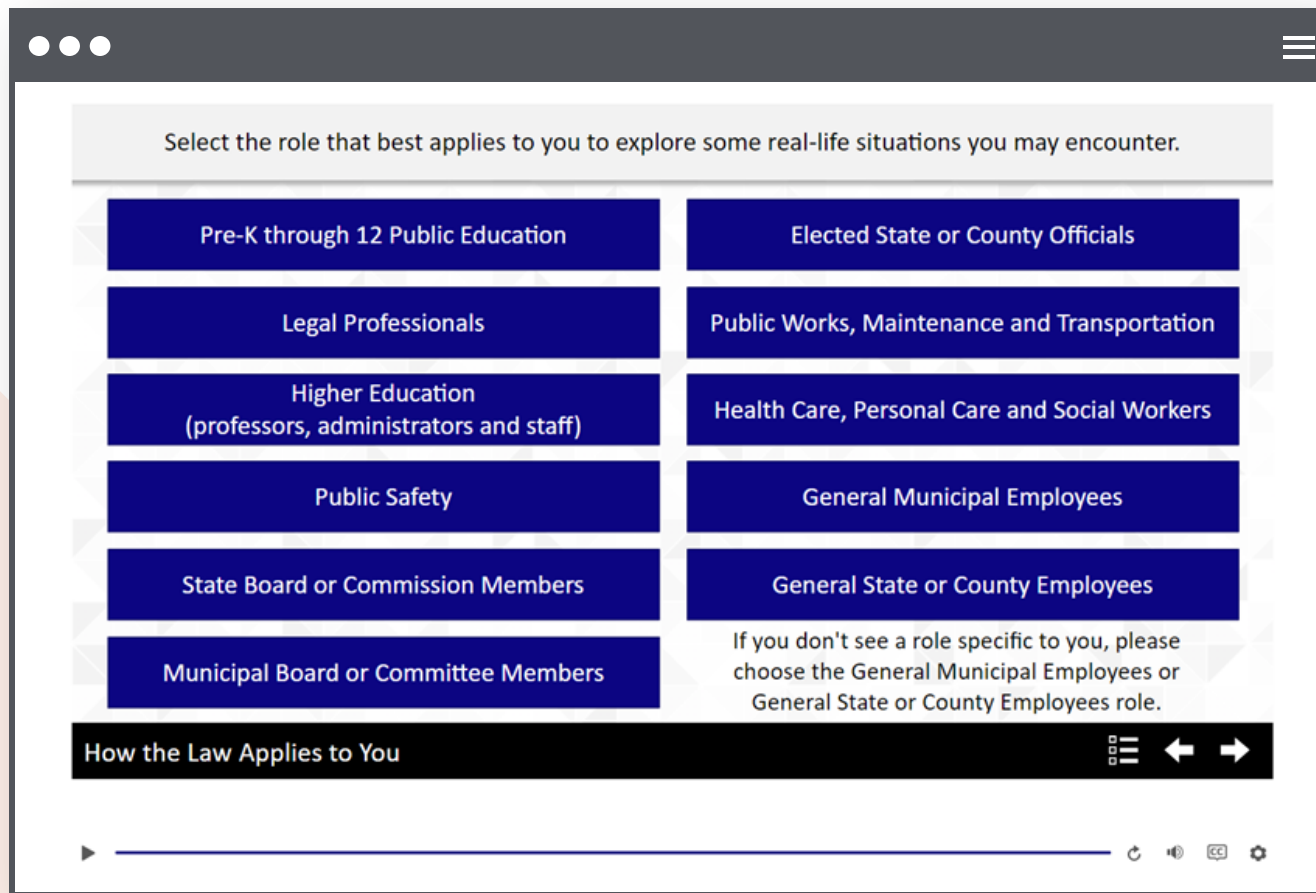


Knowledge

Enhances employees' understanding of how the law relates to their job functions

Massachusetts State Ethics Commission

The Massachusetts State Ethics Commission provides ethics training specific to the role an individual has within the Massachusetts government. The photo below identifies the various roles for which the Commission has unique training.



EXAMPLE

Massachusetts State Ethics Commission

Summary of conversation with David A. Wilson, Executive Director; David Giannotti, Public Education and Communications Division Chief; Robert Milt, Government Affairs Officer; and Gerry Tuoti, Senior Public Information and Communications Officer:



REASONS FOR IMPLEMENTING ROLE-SPECIFIC TRAINING

Massachusetts State Ethics Commission (MSEC) created its “branched content” or role-specific training after conducting a survey of employees about the prior iteration of the required training. Many employees felt the previous training was not relevant to their specific roles. MSEC realized that the daily conflict of interest concerns are vastly different for a teacher, for example, than they are for a general counsel at a state agency. The feedback, combined with MSEC’s own internal research, resulted in training that provides 35 minutes of general content followed by branched content. The user can select from one of roughly a dozen specific content branches—e.g., public safety, elected official, municipal board, K-12 educator, etc.—and they will receive content tailored to that position.



SUCCESS OF ROLE-SPECIFIC TRAINING

MSEC has seen an increase in requests for advice and complaints, likely a result of providing more specific knowledge to people about how the law applies to scenarios they have encountered at their job. Feedback from users of the branched content has been positive.



IMPLEMENTATION COSTS

The cost for implementing role-specific training was moderate to expensive. In addition to the monetary cost, which was factored into a broader overhaul of MSEC training and the implementation of a learning management system, there was significant staff time required. Staff from MSEC and other agencies developed and reviewed the material for content relevancy and accessibility.



IMPLEMENTATION TIPS

Acquiring feedback from stakeholders can be a helpful first step for ethics commissions developing the vision for how the role-specific content should appear. Collaboration with staff at different agencies can help make the content more relevant to the audience in those agencies.

Pennsylvania State Ethics Commission

The Pennsylvania State Ethics Commission includes additional material or provides relevant examples in consideration of the audience it is training. The photo below depicts who the Commission trains and for whom it may include additional pertinent information in its training.



EXAMPLE

Pennsylvania State Ethics Commission

Summary of email exchange with Mary Fox, Executive Director:



REASONS FOR IMPLEMENTING ROLE-SPECIFIC TRAINING

The Pennsylvania State Ethics Commission (PSEC) wanted to make trainings that were pertinent to different audiences who are attending the training. It has standard training but will add additional material to cover certain topics in more detail depending upon the audience, or upon the request of whoever is hosting the training. For example, when presenting to attorneys with the Governor's Office of General Counsel, PSEC added specific information relating to its advisory opinion process.



SUCCESS OF ROLE-SPECIFIC TRAINING

PSEC believes that covering issues and fact patterns that are most likely to be encountered by each particular audience has made the application of the ethics laws more understandable to that audience. Anecdotally, the focused content results in more engagement with, and enjoyment of, the material.



IMPLEMENTATION COSTS

The cost of adding tailored elements to training is minimal, as it only requires staff time.



IMPLEMENTATION TIPS

Ethics commissions should be conscious of whom the audience is for a given training and adjust the presentation accordingly. Commissions should provide individuals opportunities to give feedback that can improve the tailoring of the training. For example, PSEC recently started using a QR code linked to a simple survey on the last slide of the slide deck, so those who take the training can provide feedback while the information is still fresh.

05

Inclusive Training Material

WHAT IS IT?

Inclusive training material means deliberately incorporating a wide range of descriptions and visual representations of people and job functions featured in training scenarios. The people featured in inclusive training material have names, ages, job titles, genders, and ethnic backgrounds that reflect the diversity of the workforce who participate in the training. Providing language options and tailored word choices based on the level of legal knowledge aids in inclusivity.

WHY IT MATTERS

Inclusive training material makes ethics laws and rules accessible and relevant to more people in a diverse world. By offering trainings where employees not only can see themselves in the training scenarios but also can access the training by selecting their preferred language and without unnecessary legalese, ethics commissions can show each person that they are a valued employee serving the important mission of public service.

BENEFITS



Compliance

Fosters connection to and meaningful engagement with training materials



Accessibility

Enhances feeling of inclusion, making the ethics commission's work more available to more people

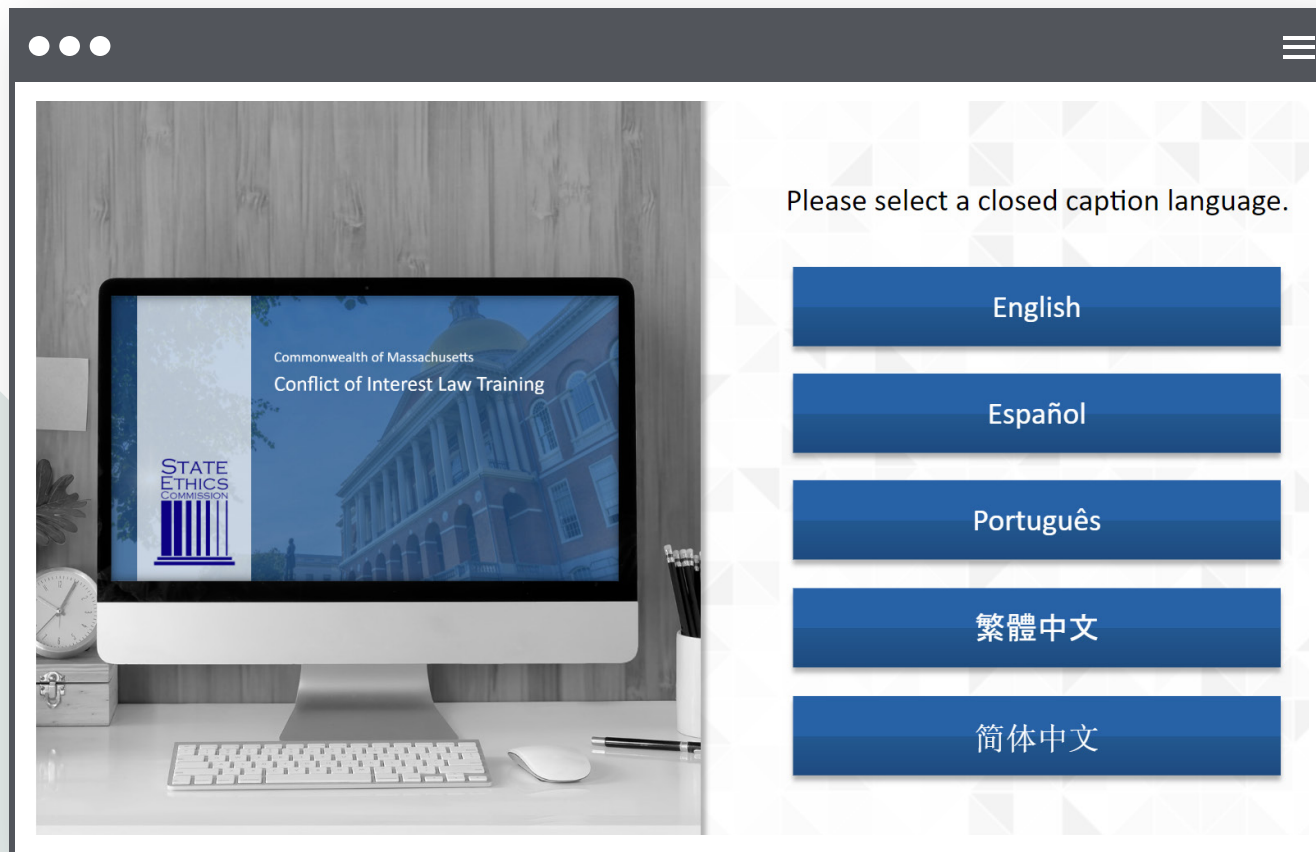


Knowledge

Increases understanding of the material by tailoring word choice for each group that receives training

Massachusetts State Ethics Commission

The Massachusetts State Ethics Commission incorporates inclusivity elements into its ethics training materials. The photo below depicts an example of inclusive material.



EXAMPLE

Massachusetts State Ethics Commission

Summary of conversation with David A. Wilson, Executive Director; David Giannotti, Public Education and Communications Division Chief; Robert Milt, Government Affairs Officer; and Gerry Tuoti, Senior Public Information and Communications Officer:



REASONS FOR INCLUSIVE TRAINING MATERIAL

MSEC wanted employees to see themselves reflected in the training materials to foster a culture of belonging. By including in the training materials images of people who looked like the employees and those who the employees would encounter in their daily work—people with diverse ages, job titles, names, and appearances—employees can know that they are seen and valued. The addition of translation through closed captioning in English, Spanish, Brazilian Portuguese, and Simplified and Traditional Chinese allows more people to engage with the training. MSEC ensured training met the Web Content Accessibility Guidelines 2.0 AA level, including screen readers and implementing best practices for accessibility.



SUCCESS OF INCLUSIVE TRAINING MATERIAL

The training's look and feel are better reflections of the values of the MSEC and what it hopes to accomplish with training: that anyone, regardless of their role, location across the state, or background, can take the course and feel welcomed and included. Feedback on the new look of the training has been positive.



IMPLEMENTATION COSTS

The cost of adding inclusivity elements to the training was minimal. Enhancing inclusivity was part of a general upgrade to training and the adoption of a learning management system. While the general overhaul of the training structure was expensive, the addition of inclusive elements (with the exception of the translations) did not add a significant financial cost to the project.



IMPLEMENTATION TIPS

Ethics commissions will need to be deliberate about inclusivity. Ethics commissions can be more inclusive in many areas of training: For example, training for an agency with a heavy concentration of lawyers can employ legalese, but training for non-lawyers should avoid wording that requires specialized knowledge to understand. It is important to be assertive in making inclusive choices, like not accepting stock graphics or language that is not inclusive. Collaboration is key, as there may be useful perspectives to consider from people across the government.

06

Ethics Liaisons

WHAT IS IT?

Ethics liaisons are agency employees appointed to coordinate and administer ethics trainings and answer ethics questions from agency staff. Ethics liaisons act as on-the-ground ethics officials within the agencies. They use their agency-specific knowledge to assist the commission with providing training and advice to agency employees. Ethics liaisons also assist with the implementation of agency-specific ethics rules.

WHY IT MATTERS

Ethics liaisons act as an extension of the ethics commission. State and local governments are complex and have a vast workforce of people performing different and specialized jobs. Ethics liaisons reduce workload for the ethics commission and aid the commission in ensuring all employees have access to relevant training and timely advice.

BENEFITS



Compliance

Provides agency staff with specialized avenues for seeking advice that helps with enforcement



Accessibility

Enables relevant staff to obtain ethics training and advice at the agency level, not just via the ethics commission



Knowledge

Helps staff better understand both general ethics laws and agency-specific laws

New Jersey State Ethics Commission

The New Jersey State Ethics Commission has implemented a system of ethics liaisons to ensure someone with agency-specific ethics knowledge is available to agency staff. The photo below depicts a searchable database of New Jersey's ethics liaisons.

The screenshot shows the NJOIT Open Data Center interface. At the top left is the logo for the State of New Jersey NJOIT Open Data Center (Data.NJ.gov). The navigation menu includes Home Page, Browse, Developers, and Help. A search bar and a Sign In button are also present. A banner at the top promotes a new data shaping and exploration experience. Below this, the dataset title is "State Ethics Commission: Ethics Liaison Officer Contact I...". A search bar within the dataset view allows users to "Find in this Dataset". Navigation options include More Views, Filter, Visualize, Export, Discuss, Embed, and About. The main content is a table with 6 columns: Department, Administration, Alternate ELO, Name, and Title. The table shows 7 rows of data.

Department	Administration	Alternate ELO	Name	Title
Department of the Treasury	Administration	Alternate ELO	Jacquelyn Weimer	Administrative Analyst 2
Department of the Treasury	ADMINISTRATION	Primary ELO	AMANDA TRUPPA	DIRECTOR
Department of Human Services	Aging Services	Primary ELO	R. Denise Lyles	Regulatory Officer 2
Department of Law and Public Safety	Alcoholic Beverage Control	Primary ELO	Amy Beth Cohn	DAG, Assistant Bureau Chief
Department of Labor and Workforce Development	Board of Mediation	Primary ELO	Alashia Chan	Executive Secretary
Department of Human Services	Central Office, Div. Deaf and ...	Alternate ELO	Gerard Hughes	Not Provided
Department of Human Services	Central Office, Div. of Deaf a...	Alternate ELO	James Patterson	Not Provided

< Previous Next > Showing rows 1 to 100 out of 149

Summary of conversation with Christina Fullam, Esq., Deputy Executive Director:



REASONS FOR IMPLEMENTING ETHICS LIAISONS

Ethics liaisons were implemented to ensure someone with knowledge of the inner workings of each agency was responsible for training and advising the agency staff on ethics laws. New Jersey's system of ethics liaisons was initially established informally, and it was implemented formally by executive order in 2002.



SUCCESS OF ETHICS LIAISONS

The ethics liaison system has aided in compliance because someone who understands the practical application of ethics laws to agency functions is always on duty. They act as the first line of defense for preventing violations.



IMPLEMENTATION COSTS

While the monetary cost is minimal, an ethics liaison system involves significant staff time. The ethics liaisons are regular agency staff members who have the ethics training and advice duties in addition to their regular duties. In some cases, there may be a staff member exclusively dedicated to ethics, which would be a budget consideration.



IMPLEMENTATION TIPS

The ethics commission should be available to the ethics liaisons when needed and be willing to engage in outreach directly to each agency head. Outreach helps foster the relationship between the ethics commission and the ethics liaisons and establishes a mutual understanding of the goals of administering the ethics laws. Having support from the head of the executive branch also helps foster a culture of ethics that makes the ethics liaison program run smoothly.

07

Ethics Site Visits

WHAT IS IT?

Having ethics site visits means establishing an on-site presence at agencies and offices that fall under the purview of the ethics commission, providing easily accessible commission staff to answer questions related to the application of ethics laws or upcoming filings.

WHY IT MATTERS

Ethics site visits provide a personal connection to ethics laws and the ethics commission when much of the work has been shifted online. They help ethics commissions foster relationships and build trust with those who are regulated by the commission. People feel more comfortable asking questions when they are face-to-face and can immediately get a response. The ethics site visits also allow the ethics commission to provide timely reminders about upcoming filings or assist with compliance questions in real time.

BENEFITS



Compliance

Allows commissions to personally remind and help people comply with ethics laws



Accessibility

Provides physical accessibility in an increasingly digital world



Knowledge

Lets people get immediate answers to questions

Missouri Ethics Commission

The Missouri Ethics Commission regularly visits the Secretary of State's office and the General Assembly to provide in-person help to those regulated by the Commission. The photo below depicts the Commission's use of social media to advertise its on-site visits.



Summary of conversation with Kaley Burroughs, Compliance and Education Specialist:



REASONS FOR IMPLEMENTING ETHICS SITE VISITS

The Missouri Ethics Commission (MEC) has been regularly visiting its Secretary of State's office and General Assembly for years because it believes that it is important to build trust and have face time with the community. Site visits enable the commission to meet people where they physically are and provide an avenue for open dialogue about ethics laws.



SUCCESS OF ETHICS SITE VISITS

MEC has found that its physical presence alone increases compliance with filing deadlines. Because it brings financial disclosure reports to its on-site visits, oftentimes individuals will fill out their forms alongside MEC employees to have questions answered instantly. Candidates, Assembly members, agency employees, and even lobbyists regularly take advantage of the service by asking questions about lobbying and gift bans—questions that they may not have felt compelled to call about or to email MEC.



IMPLEMENTATION COSTS

The implementation cost of providing ethics site visits is minimal. MEC's only cost is the time of the staff who go on-site. For MEC, the travel costs are extremely low, as the commission is in very close proximity to the Secretary of State's office as well as the General Assembly.



IMPLEMENTATION TIPS

Ethics commissions looking to create an on-site presence should know the layout of the area they plan to visit. They should also talk with support staff so they can set up in the optimal location at the best time. Commission staff should not be afraid to call out to individuals passing by the table, to give themselves an opportunity to preemptively talk about things that might be of interest.

08

Expedited Advice

WHAT IS IT?

Expedited advice means providing written opinions quickly to those seeking guidance to comply with ethics laws. To provide expedited advice, ethics commissions can issue binding informal opinions without making requesters wait for the formal advisory opinion process.

WHY IT MATTERS

The formal advisory opinion process often takes longer than a requester can wait to receive an answer. This often disincentivizes individuals from requesting guidance because they know it will not be available when they need it. Expedited advice can decrease work for commission board members by allowing staff to respond informally without requiring commissioners to vote or approve the response. Expedited advice also may help a commission work through its backlog by simplifying the process for answering certain questions.

BENEFITS



Compliance

Incentivizes individuals to ask questions before taking action that could potentially violate ethics laws



Accessibility

Fosters public sentiment that the ethics commission is responsive and questions will get answered

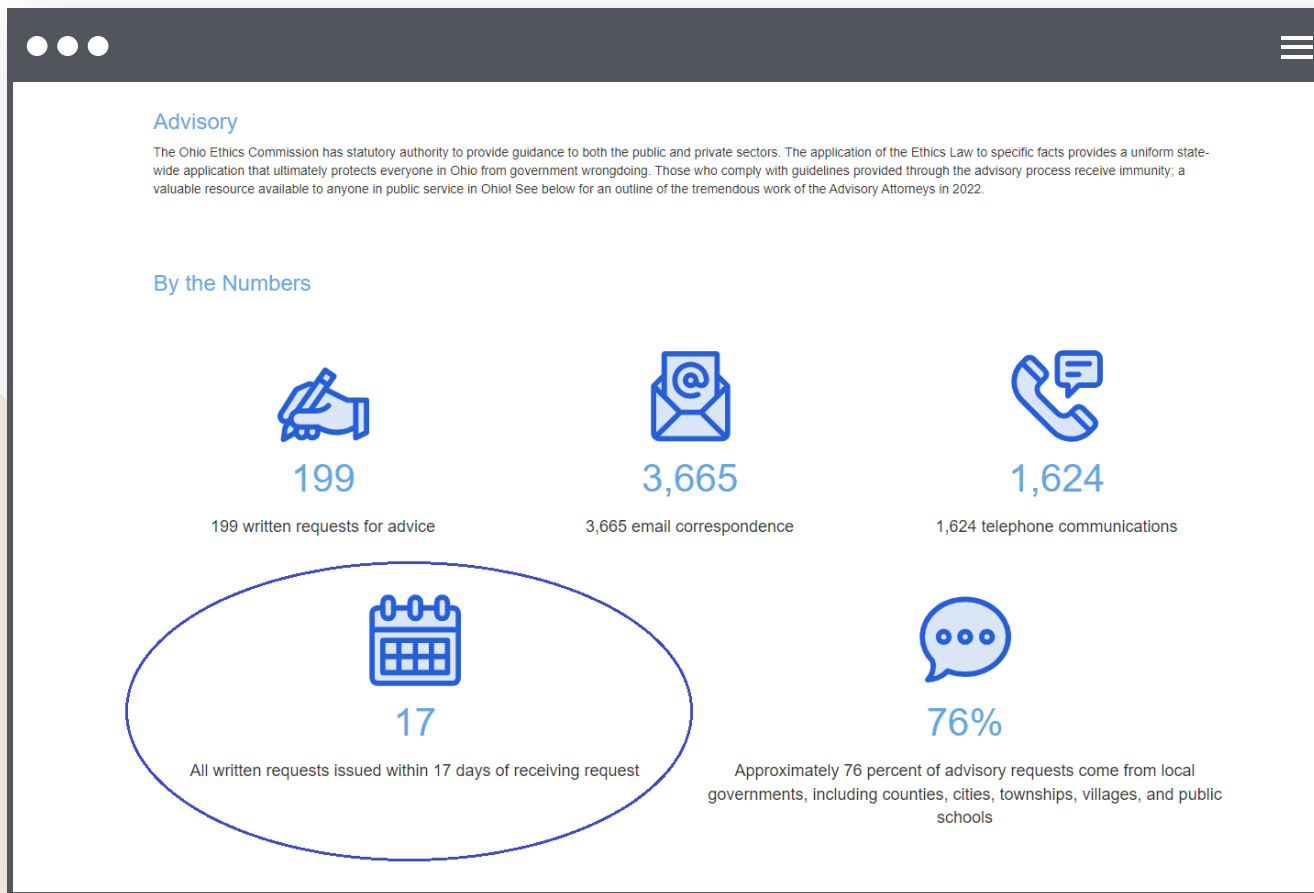


Knowledge

Provides option to understand the application of ethics laws to a time-sensitive matter

Ohio Ethics Commission

The Ohio Ethics Commission has implemented an informal opinion process that allows it to provide advice usually within two to three weeks. The photo below depicts the Commission's 2022 annual report, which shows that all written requests that year were issued within 17 days of receiving the request.



Summary of conversation with Paul M. Nick, Executive Director:



REASONS FOR IMPLEMENTING EXPEDITED ADVICE

In 2011, the Ohio Ethics Commission (OEC) faced a large advisory opinion backlog, as all the drafted opinions had to be approved by the commissioners. After working through the backlog, OEC implemented systems to prevent another backlog from occurring. This including providing expedited advice through guidance that does not require commission approval and therefore could be published more quickly, within 45 days, but usually as quickly as two to three weeks.



SUCCESS OF EXPEDITED ADVICE

Since creating an informal opinion process, OEC no longer has an opinion request backlog and has received an increase in requests for guidance. OEC has received feedback that people appreciate the commission's responsiveness.



IMPLEMENTATION COSTS

The implementation cost for providing expedited advice is minimal. As the requests for guidance have increased, OEC has hired an additional attorney so that it can continue to be responsive.



IMPLEMENTATION TIPS

It is important to regularly check in with the commissioners to ensure that guidance continues to be useful. Also, commissions should be consistent with informal guidance because employees must be able to rely on it and feel comfortable continuing to ask for guidance. To ensure a timely response, ethics commissions should consider providing a specific time frame, so people will know when they can expect an answer to their question.

09

Expanded Social Media Outreach

WHAT IS IT?

Expanded social media outreach means increasing the variety of social media platforms commissions use to connect with stakeholders (e.g., TikTok).

WHY IT MATTERS

Expanded social media outreach is important because it allows different audiences to learn more about the ethics commission and ethics laws and rules. Publishing content on social media using a structure, tone, and voice familiar to the platforms' users encourages connection and engagement in a way that a PDF or official document may not.

BENEFITS



Compliance

Provides reminders and information about specific laws in an engaging medium



Accessibility

Uses plain language in simple formats to make ethics laws more understandable for a broader audience

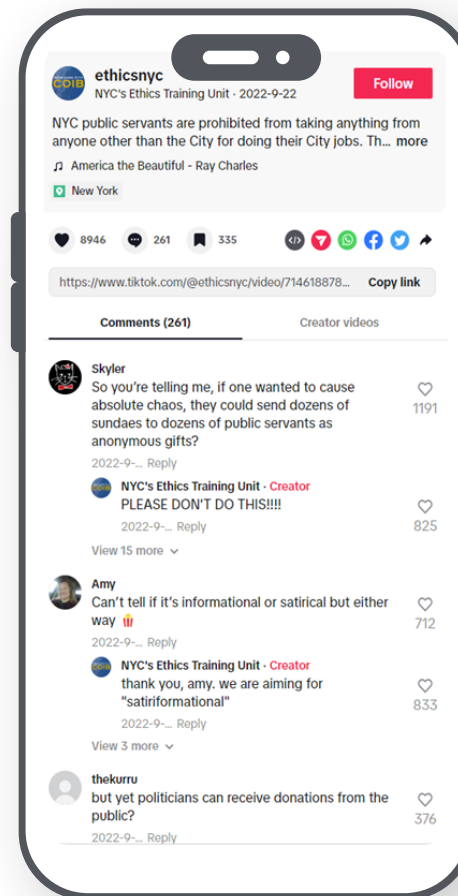
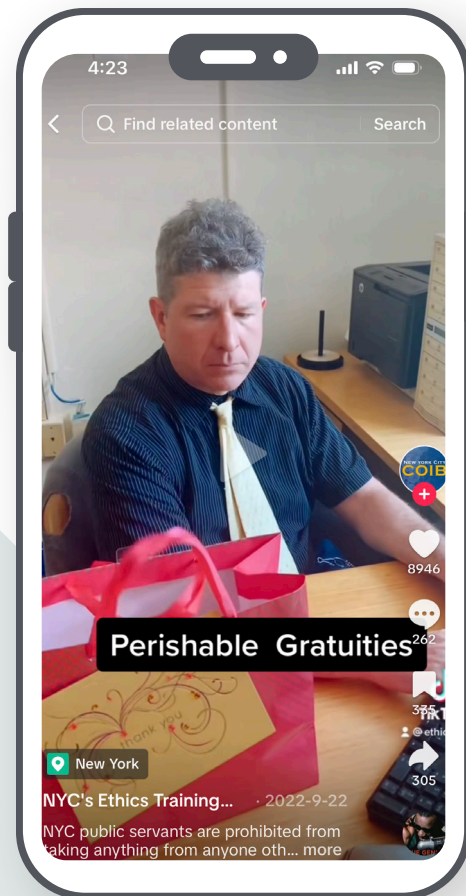


Knowledge

Teaches specific ethics laws that are related to relevant and timely topics

New York City Conflicts of Interest Board

The New York City Conflicts of Interest Board has expanded its social media outreach by experimenting with new platforms. The photo below depicts its use of TikTok videos to help educate stakeholders about ethics laws.



Summary of conversation with Alexander Kipp, Director of Education and Engagement:



REASONS FOR IMPLEMENTING EXPANDED SOCIAL MEDIA OUTREACH

The New York City Conflicts of Interest Board (COIB) began posting videos on TikTok because it believed that people learn better through storytelling, which helps employees see a situation through the eyes of another person. Playfulness and laughter make the information more digestible and more likely to be remembered. COIB realized that it can deploy the videos across other platforms and integrate them into training materials, broadening the use and audience of the videos beyond TikTok.



SUCCESS OF EXPANDED SOCIAL MEDIA OUTREACH

COIB's TikToks have been seen by thousands of people, with one video alone having been played over 44,000 times. The videos have helped COIB expand its audience through media engagement and the public nature of social media, which has given COIB more coverage and positive attention. The use of social media generally has made COIB more accessible.



IMPLEMENTATION COSTS

The implementation cost is minimal. COIB stated that videos for TikTok can be filmed on any smartphone and edited on TikTok itself. However, if ethics commissions wanted an easier editing process, Adobe licenses are relatively inexpensive. If ethics commissions utilize talent within their own staff to write and appear in the videos, the cost remains extremely low.

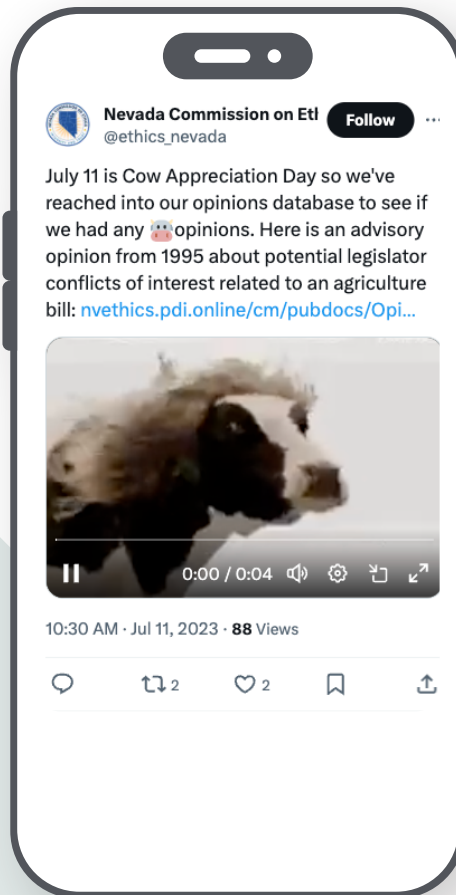


IMPLEMENTATION TIPS

Ethics commissions should assess what assets they already have, such as creative staff and cameras. Videos do not have to be funny to be engaging. Commissions should find ways to use the social media content beyond just posting on the original platform, and incorporating videos into in-person trainings to help engage an audience who may not be on social media.

Nevada Commission on Ethics

The Nevada Commission on Ethics has increased its social media outreach on platforms like X, the site formerly known as Twitter. The photo below depicts the Commission's use of social media to provide timely and relevant reminders about the application of ethics laws.



Summary of conversation with Ross Armstrong, Executive Director:



REASONS FOR IMPLEMENTING EXPANDED SOCIAL MEDIA OUTREACH

The Nevada Legislature's X account, the site formerly known as Twitter, has long been a place for discussion, which opened the door to other government social media accounts. For that reason, the Nevada Commission on Ethics (NCE) made a concerted effort to become more active on X, to increase awareness about the commission and to provide people an opportunity to interact with NCE in a less formal way.



SUCCESS OF EXPANDED SOCIAL MEDIA OUTREACH

Expanding NCE's social media outreach has increased awareness about the commission. NCE has received many questions about ethics laws, such as cooling-off periods, through social media. It found that its account provides people an opportunity to express their ethics concerns, as it gets tagged to address issues people believe may be an ethics violation.



IMPLEMENTATION COSTS

The implementation cost of expanding an ethics commission's social media outreach is minimal. NCE has found that the cost is mostly in the time it takes to develop messaging and post the content.



IMPLEMENTATION TIPS

Ethics commissions should devote time and effort to deploy social media content, even though it can be challenging in the beginning. The people commissions want to reach are oftentimes on social media. Commissions should make their posts fun to increase engagement, and link to additional resources to keep posts brief and digestible.

Training Compliance Report

WHAT IS IT?

Training compliance reports are published records measuring public officials' compliance with their ethics training and education requirements.

WHY IT MATTERS

Training compliance reports show the public whether officials are accessing training and completing education requirements that are designed to protect the public's trust. Training compliance reports incentivize public officials to comply with the training requirements because it provides a level of accountability to the public.

BENEFITS



Compliance

Provides incentive to adhere to training requirements through public accountability



Accessibility

Delivers compliance information to employees and the public openly and prominently



Knowledge

Enhances the public's understanding of the officials' compliance obligations

North Carolina State Ethics Commission

The North Carolina State Ethics Commission publicizes a compliance report tool for use by anyone who has complied with education requirements. The photo below depicts the Commission's compliance report for the Office of the Governor.

North Carolina State Ethics Commission

Compliance Report

Board
Governor, Office of the

Submit

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Full Name	Appointment Start Date	Appointment End Date	Last SEI Received Date	Last Education Received Date	Next Education Due Date
Susan Dean	06/15/2016		02/22/2023	02/03/2023	02/03/2025
Stephen Bryant	01/01/2017		04/17/2023	11/08/2021	11/08/2023
Scarlett Hargis	01/01/2017		04/17/2023	02/15/2023	02/15/2025
Sheryl Hartfield	02/06/2017		04/17/2023	03/30/2023	03/30/2025
Claudia Shoemaker	03/15/2017		02/27/2023	01/19/2023	01/19/2025
Lorea Stallard	04/17/2017		04/12/2023	04/03/2023	04/03/2025
James McCleskey	06/05/2017		04/10/2023	10/18/2023	10/18/2025
Kevin Monroe	06/05/2017		04/17/2023	12/15/2021	12/15/2023
John Christy	06/05/2017		03/03/2023	01/26/2022	01/26/2024
Geoffrey Coltrane	06/13/2017		04/17/2023	07/07/2023	07/07/2025
Kristen Guillory Skordinski	01/11/2018		03/29/2023	07/12/2022	07/12/2024
Susan Johnson	12/20/2021		04/17/2023	06/20/2022	06/20/2024
Jessica Winebrenner	03/08/2022		04/17/2023	03/25/2022	03/25/2024
Peter Connelly	03/11/2022		04/16/2023	08/29/2023	08/29/2025
Peter Ledford	08/15/2022		04/17/2023	01/19/2023	01/19/2025
Andrea DeSantis	02/14/2022		04/17/2023	08/04/2022	08/04/2024
Scarlett Hargis(EL)			04/17/2023	02/15/2023	02/15/2025
Gregory McLeod(EL)			11/02/2023	11/17/2021	11/17/2023
Emily Hennen	02/06/2023			02/02/2023	02/02/2025
Anne Evangelista	02/20/2023		02/07/2023	02/21/2023	02/21/2025
Kenneth Eudy	04/03/2023		03/22/2023	09/15/2021	09/15/2023
Eiliana Hensley	03/21/2023			08/16/2023	08/16/2025
Whitney Compassi	11/28/2022			04/12/2023	04/12/2025
Jose Trueba	10/03/2022			07/12/2023	07/12/2025
Darren "Dylan" Dodson	09/26/2022			06/29/2023	06/29/2025

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Adapted in part from an email exchange with Kathleen S. Edwards, Executive Director:



REASONS FOR IMPLEMENTING TRAINING COMPLIANCE REPORT

North Carolina State Ethics Commission (NCSEC) has a compliance report tool that allows anyone to search by agency to determine who is complying with financial disclosure form deadlines and the North Carolina Ethics Act's education and financial disclosure requirements. It was designed to make this information available to the public and the officials subject to the requirements.



SUCCESS OF THE TRAINING COMPLIANCE REPORT

The availability of training and education compliance online has saved staff time—it eliminates the need for those interested in compliance details to contact the commission by email or telephone. It has made it easier for the public officials regulated by the commission to monitor their compliance and, when necessary, bring themselves into compliance. The search tool facilitates a public official's observance of the Ethics Act's conflict of interest standards by making information about an official's financial interests readily available to the public, members of the media, and the official's colleagues and supervisors.



IMPLEMENTATION COSTS

Costs could range from minimal to expensive, depending on how advanced the public-facing tool is. A simple search using data already collected by the ethics commission may be a minimal technological lift that can be handled in-house; a more dynamic dashboard with advanced search functions and display graphics could require the use of a third-party consultant.



IMPLEMENTATION TIPS

Commissions should approach training compliance reports with a clear vision for how much and what kind of data should be made public about trainings. The public-facing tool should be easy to use and provide information clearly.

TOP 10 TOOLS CHART

Tool	Benefits			Cost	Examples
1. Learning Management Software	COMPLIANCE	ACCESSIBILITY	KNOWLEDGE	Moderate – Expensive	District of Columbia Board of Ethics and Government Accountability ▶ City of Atlanta Ethics Office ▶
	Allows ethics commissions to effectively train individuals so that they better understand ethics laws	Creates an opportunity for individuals to take trainings wherever and whenever they have access to a computer or mobile device	Provides trainings that can be completed at an individual's own pace and that can be revisited, as necessary		
2. Training in Lieu of Penalties	Incentivizes individuals to learn from their mistakes to avoid future monetary penalties	Provides individuals the unique opportunity to receive remedial training on the laws they do not understand	Enhances understanding of laws and rules that may be confusing rather than penalizing individuals for unintentional violations	Moderate	California Fair Political Practices Commission ▶
3. Livestreamed Training	Provides more opportunity for individuals to understand the ethics laws, making it more likely they will follow them	Allows those who may not be able to travel to a training to participate	Broadens understanding of the ethics laws across more of the workforce	Low – Moderate	Rhode Island Ethics Commission ▶ Hawai'i State Ethics Commission ▶
4. Role-Specific Training	Contextualizes the law through training exercises that closely resemble actual scenarios unique to the position	Makes commission activities and ethics laws relevant to all employees, regardless of position	Enhances employees' understanding of how the law relates to their job functions	Moderate – Expensive	Massachusetts State Ethics Commission ▶ Pennsylvania State Ethics Commission ▶
5. Inclusive Training Material	Fosters connection to and meaningful engagement with training materials	Enhances feeling of inclusion, making the ethics commission's work more available to more people	Increases understanding of the material by tailoring word choice for each group that receives training	Low	Massachusetts State Ethics Commission ▶

CONTINUED ON NEXT PAGE

TOP 10 TOOLS CHART

Tool	Benefits			Cost	Examples
	COMPLIANCE	ACCESSIBILITY	KNOWLEDGE		
6. Ethics Liaisons	Provides agency staff with specialized avenues for seeking advice that helps with enforcement	Enables relevant staff to obtain ethics training and advice at the agency level, not just via the ethics commission	Helps staff better understand both regular ethics laws and agency-specific laws	Low – Moderate	New Jersey State Ethics Commission ▶
7. Ethics Site Visits	Allows commissions to personally remind and help people comply with ethics laws	Provides physical accessibility in an increasingly digital world	Lets people get immediate answers to questions	Low	Missouri Ethics Commission ▶
8. Expedited Advice	Incentivizes individuals to ask questions before taking action that could potentially violate ethics laws	Fosters public sentiment that the ethics commission is responsive and questions will get answered	Provides option to understand the application of ethics laws to a time-sensitive matter	Low	Ohio Ethics Commission ▶
9. Expanded Social Media Outreach	Provides reminders and information about specific laws in an engaging medium	Uses plain language in simple formats to make ethics laws more understandable for a broader audience	Teaches specific ethics laws that are related to relevant and timely topics	Low – Moderate	New York City Conflicts of Interest Board ▶ Nevada Commission on Ethics ▶
10. Training Compliance Report	Provides incentive to adhere to training requirements through public accountability	Provides compliance information to employees and the public openly and prominently	Enhances the public's understanding of the officials' compliance obligations	Low – Expensive	North Carolina State Ethics Commission ▶



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