

December 21, 2021

Keely Martin Bosler, Director
California Department of Finance
915 L Street
Sacramento, CA 95814

Dear Director Keely Martin Bosler,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the Fair Political Practices Commission submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2021.

Should you have any questions please contact Loressa Hon, Chief of Administration, at (916) 322-7578, LHon@fppc.ca.gov.

GOVERNANCE

Mission and Strategic Plan

The Fair Political Practices Commission (FPPC) was created by the Political Reform Act of 1974 (Act), a ballot initiative passed by California voters. The mission of the Fair Political Practices Commission is to promote the integrity of representative state and local government in California through fair, impartial interpretation and enforcement of political campaign, lobbying, and conflict of interest laws. To meet its responsibilities under the Act, the Commission adopts and amends regulations. It also develops required forms, prepares manuals and instructions, aids agencies and public officials with record keeping and reporting, and maintains a central file of statements of economic interests for certain state and local officials. The Commission staff also investigates alleged violations of the Political Reform Act, imposes penalties when appropriate, and assists state and local agencies in the development and enforcement of conflict-of-interest codes. In an effort to reduce violations, the FPPC educates the public and public officials on the requirements of the Act and provides written and oral advice to public agencies and officials and conducts seminars and training sessions.

The Fair Political Practices Commission has primary responsibility for the impartial and effective administration of the Political Reform Act. The mission of the Act is to serve as the legal bedrock of governmental ethics in California. It regulates:

- Campaign Finance
- Financial Conflicts of Interest by Public Officials
- Lobbyist Registration and Reporting
- Post-Governmental Employment
- Political Mass Mailings at Public Expense
- Gifts and Honoraria given to Public Officials and Candidates

The Commission and its staff have a strong focus on integrity and accountability. Management and staff have a great work ethic and believe in the mission of the agency.

FPPC's principal areas of responsibility are described as follows:

Legal Division is headed by the General Counsel and is comprised of staff attorneys, Political Reform Consultants, and support staff.

- **Litigation** - The FPPC is primarily responsible for representing the state in litigation challenging the Act, as well as litigation involving the FPPC itself. Legal Division attorneys are authorized by statute to represent the FPPC in court. However, the FPPC may also request representation by the Attorney General's office. The Act provides that, upon request, the Attorney General must provide legal advice and representation without charge to the Commission. In these cases, the Commission's staff attorneys work closely with assigned Deputy Attorney Generals to provide subject matter expertise and oversight.
- **Advice** - The Legal Division staff provide written advice in response to requests via email and mail from state and local officials, candidates and campaign committees, and lobbyists. Advice requests concern all different areas of the Act, including financial conflicts of interest and campaign finance reporting and disclosure. Staff also provide advice in response to telephone requests when the questions are relatively straightforward.
- **Regulations** – Legal Division attorney and staff draft new and amended regulations to implement and interpret the provisions the provisions of the Act, as well as regulations governing the operations and procedures of the Commission
- **Legislation** - The Legal Division assists in drafting Commission-sponsored legislation and provides analysis on other bills that impact the Act.
- **Conflict of Interest Codes** – Legal Division staff review and approve code adoptions and amendments for all state and multi-county agencies. The Political Reform Consultants also assist various government agencies in developing their own conflict of interest codes via webinars, training materials, and individual assistance.
- **Training, Assistance and Public Outreach** - Legal Division staff prepare and conduct extensive training and outreach, including workshops and webinars, to help interested parties better understand their obligations under the Act. The division develops forms, manuals, and other written resource materials covering all areas of the Act.

Enforcement Division is a team of lawyers, investigators, political reform consultants and support staff that investigate and administratively prosecute suspected violations of the Political Reform Act.

Enforcement Process - The Enforcement Division analyzes and processes over 1,500 complaints and referrals per year about potential violations of the Act. Complaints and referrals are received from citizens, other government agencies, and the media. The Enforcement Division also investigates on its own initiative. A matter will be fully investigated if there is sufficient information to believe that a violation of the Act has occurred.

- **Administrative Enforcement Case Resolutions** - A complaint can be resolved in several ways depending on the strength of the evidence, the particular facts, and the amount of public harm involved. If there is insufficient evidence to prosecute, a case may be closed with a letter finding no violation or an advisory letter. If the seriousness of the offense and public harm are low, a warning letter may be issued identifying a violation of the Act but concluding a monetary fine is not warranted. Finally, if the case merits pursuit of a fine, the Enforcement Division will prosecute the violators and may seek penalties of up to \$5,000 per violation, which must be

approved by the Commissioners.

- Collaboration - During an investigation the Enforcement Division may uncover evidence of criminal misconduct, or an outside agency may uncover evidence of violations of the Act. It is common in these circumstances for each agency to notify the other and collaboratively enforce California law. In addition, the FPPC also assists the attorney general's office, the Federal Bureau of Investigations, district attorneys and authorized city attorneys in analyzing, investigating and prosecuting violations of the Act.

Administration and Technology Division oversees personnel functions, budgeting, accounting, business services, print services, and employee-employer relations services.

- Information Technology- the unit plays a crucial role in fulfilling the Commission's goal to increase transparency through the technology unit.
- Personnel - Personnel functions include recruitment, hiring, position classifications and reclassifications, attendance and payroll, training, grievances and punitive action. The Division also handles equal employment opportunity, labor relations and reasonable accommodation and ergonomic issues.
- Budgeting - Budgeting functions include the development, management and revision of the Commission's budget. The Division also accounts for all funds expended by the Commission.
- Business Services - Business services include building and space management, communications, contracts and procurement, equipment and supplies, maintenance, and travel.
- Processing Statements of Economic Interests - Form 700. The Administration Division administers and acts as filing officer for over 25,000 Statements of Economic Interests from all levels of government across California.

Control Environment

The Fair Political Practices Commission is a five-member independent, non-partisan commission that has primary responsibility for the impartial and effective administration of the Political Reform Act. The Act regulates campaign financing, conflicts of interest, lobbying, and governmental ethics. The Commission's objectives are to ensure that public officials act in a fair and unbiased manner in the governmental decision-making process, to promote transparency in government, and to foster public trust in the political system.

The Commission conducts monthly hearings where the FPPC meets to hear and vote on enforcement matters, adopt regulations, discuss legislative and litigation reports, and update the public about what is going on at the Commission. The hearings are open to the public and time is allotted for public comment. There are several goals the Commission is promoting to help foster the public's trust in our political system. Foremost, the Commission continues to diligently prosecute serious violations of the law, ensuring that officials operate in a way that does not betray the public's confidence. Second, the Commission strives to increase transparency by utilizing technology to provide "smart disclosure," giving more people easy access to vital information about their public officials and campaign financing. Finally, the Commission concentrates on adopting meaningful reforms while maintaining the highest ethical standards. The objective is to streamline the rules to reduce redundancy, eliminate loopholes and improve accountability with more timely and accurate disclosures.

To ensure that the accountability and authority for governance and management of the FPPC is clearly

stated, the Commission has set forth a Governance Policy to specify the roles of the Commission, and its delegation of powers and duties to the Chair and the Executive Director. The FPPC Governance Policy was adopted by the Commission in December 2019. All authority granted by statute to the Commission is retained, except as specifically delegated herein or by other regulation. The Commission's statutory duty is to ensure that the Political Reform Act is impartially and effectively administered and implemented. The policy is intended to assist the Commission in its oversight responsibilities, to ensure the FPPC's compliance with all applicable laws governing the operations of the agency, and its employees and Commissioners, including but not limited to the Bagley-Keene Open Meeting Act, the Public Records Act, the Administrative Procedure Act, and State laws protecting employees from unlawful workplace practices, discrimination, etc. To assist the Commission in its oversight responsibilities, financial control and reporting system, and the Commission's compliance with all laws governing the Agency. The policy ensures the proper management of the FPPC, delegating execution of Commission policies and strategic objectives to the Chair and Executive Director and, through the Executive Director, re-delegation to the employees of the FPPC.

Additionally, the Governance Policy allows the Commission to create 2-person advisory committees to assist in the performance of the Commission's functions, which shall consist of the Chair and one other Commissioner. Each Committee operates to assist the Commission in evaluating and considering the adoption of key policies, goals, regulations and other action items, and is not intended to direct the daily operations of management of the Commission. The Commission has created four advisory committees: the Law and Policy Committee, Budget and Staffing Committee, Public Outreach and Technology Committee and Litigation Committee.

The Budget and Staffing Committee's responsibilities include but are not limited to:

- A. Reviewing and recommending the annual FPPC budget to the Commission.
- B. Ensuring that Commissioners have adequate information concerning, and an opportunity to comment on, the proposed FPPC annual budget.
- C. Reviewing and advising the Commission on requested unbudgeted expenditures by the Executive Director in excess of \$1,000.
- D. Reviewing and recommending to the Commission, policies and procedures that will ensure the integrity of the financial control and reporting system.
- E. Periodically receiving information about the Commission's staffing needs and preparing recommendations to the Commission regarding the same.
- F. Recommending to the Commission the selection, evaluation, and, if necessary, discipline or dismissal of the Executive Director.
- G. Recommending to the Commission the adoption or revision of personnel or office policies, including but not limited to policies concerning the procedures to be followed by the Executive Director in the selection, evaluation, and discipline of dismissal of staff.

The Law and Policy Committee's responsibilities include but are not limited to:

- A. Reviewing legislation that proposes significant substantive, as opposed to merely technical, changes to the Act and providing information and recommending formal positions to the Commission regarding the same.
- B. Reviewing changes to the Act and recommending potential regulatory action by the Commission as necessary to implement such changes.

- C. Periodically reviewing Commission regulations for potential revisions that would improve transparency, efficiency, compliance with, and enforcement of the Act and recommend such changes when appropriate to the Commission for consideration.
- D. Recommending to the Commission internal policies and procedures that, among other things, will assure compliance with all laws governing the Agency.
- E. Recommending to the Commission the adoption or revision of procedures to archive and make publicly available the various rules, policies and resolutions of the Commission.

Each advisory committee is responsible for reviewing and recommending to the full Commission those policies, goals, regulations and other action items that are pertinent to its subject matter jurisdiction.

Each committee reports regularly on its activities and anticipated activities discussions and deliberations of significant issues and presents recommendations with any supporting documentation to the full Commission, to promote transparency and ensure that all Commission members and the public are adequately informed. Each committee operates to assist the Commission in evaluating and considering the adoption of adopting key policies, goals, regulations and other action items, and is not intended to direct the daily operations of management of the Commission.

The chair, appointed by the Governor, is a voting member of, and the presiding officer of the Commission. The Chair: (a) Provides leadership and guidance to the Commission and staff regarding all aspects of FPPC policy. (b) Acts on behalf of, and in the name of, the Commission between meetings of the Commission, including certifying actions taken by the Commission. (c) Speaks for and represents the Commission in communications with the public, the press, and government institutions.

- d. Provides daily oversight of the management of the FPPC. (e) On a regular basis solicits input from the Commissioners concerning Commission priorities and activities and reports to the Commissioners on actions taken on behalf of the Commission. (f) With input from Commissioners and staff, the Chair submits a tentative Commission agenda to the other Commissioners for their review and approval as to an item description or placement, but not as to the merits of any item, prioritizing and scheduling agenda items in conformance with Commission established policy, however any item proposed for a Commission agenda by two or more Commissioners shall be placed on that agenda in the form requested. (g) The Chair includes a final agenda item each month for Commissioner comments, in order to provide an opportunity for Commissioners to publicly raise concerns among themselves in a public meeting. (h) Ensures that the information provided to the Commission is comprehensive, timely, impartial and not unduly burdensome. (i) Except as otherwise required by any provision of Article 9 of Chapter 1 of Part 1 of Division 3 of Title 2 of the Government Code to the contrary, the Chair conducts Commission meetings with reference to Robert's Rules of Order and other rules adopted by the Commission.

The Commission delegates to the Executive Director primary responsibility for the operations and management of the Agency under the day-to-day supervision of the Chair in conformance with Commission policy. The Executive Director is responsible for ensuring that the Chair and Commissioners are fully informed regarding the operations and management of the Agency. The Executive Director acts as the chief of staff of the FPPC. The Executive Director:

1. Selects, regularly evaluates, and when necessary, disciplines or dismisses executive staff in accordance with Commission policies and procedures.

2. With input from the Division Chiefs, hires, evaluates promotes, and when necessary, disciplines or dismisses other staff in accordance with Commission policies and procedures.
3. Regularly reports to Budget and Staffing Committee and the Commission on activities in connection with the hiring, evaluation, promotion, discipline, and dismissal of executive staff and other staff.
4. In consultation with the Budget and Staffing Committee, prepares and submits to the Commission all office policies and procedures applicable to staff not in conflict with any statute, regulation, or applicable state employee collective bargaining contract. Such policies include, but are not limited to:
 - A. Work hours/flexible schedules/telecommuting of staff;
 - B. Handling of communications within and outside the agency, including text messages, e-mail and public records act policies;
 - C. Policies affecting all employees, such as dress code;
 - D. Creation and maintenance of duty statements for all staff positions;
 - E. Training and development of staff;
 - F. Handling of special assignments and staff projects; productivity and time-keeping systems; and
 - G. Evaluation of staff policies and reports as directed by the Commission.
5. Receives and coordinates requests from commissioners regarding staff work and, in consultation with the Chair and Division Chiefs, prioritizes such requests consistent with Commission policies and goals.
6. Subject to the limitations of Commission established policy and under the day-to-day direction of the Chair, the Executive Director may act on behalf of and in the name of the Commission between meetings of the Commission, including certifying actions taken by the Commission. The Executive Director may not establish or revise policies, promulgate or amend rules or regulations, issue or revise Commission opinions, or approve or revise positions on legislation pursuant to this subdivision.
7. The Executive Director reports in writing each month to the Commission on actions taken on behalf of the Commission for its review and approval.
8. Pursuant to Commission established policy and under the day-to-day oversight of the Chair, the Executive Director ensures that the information provided to the Commission is comprehensive, timely, impartial and not unduly burdensome.
9. Under the day-to-day oversight of the Chair, and subject to established Commission policy, the Executive Director oversees the implementation of the short-term and long-term goals and priorities of the Commission and reports to the Commission in writing on achievement of its goals and priorities.
10. Pursuant to Commission established policy and under the day-to-day oversight of the Chair, the Executive Director exercises oversight over Commission staff with respect to their official duties to communicate with the public, the press, and government institutions to ensure that those communications are forthright, accurate, and do not disparage any Commissioner or staff member.

The Executive Director also acts as the chief budgetary and administrative officer of the FPPC.

Information and Communication

Internal Communication

FPPC plans to communicate monitoring activities to key members of management through verbal and written communication. Every division at FPPC will maintain monitoring documentation to meet business needs. Recipients of monitoring reports are at all levels of management with the emphasis placed on monitoring and control oversight at the lowest management level possible. The frequency and type of reporting will depend on the nature of operations, priorities, and the organization's needs.

External Communication

The FPPC conducts a variety of meetings that ranges from the Commission's monthly hearing, opportunities for public comment, and trainings for the regulated community. Public participation is encouraged.

At its monthly meeting, the FPPC meets to hear and vote on enforcement matters, adopt regulations, discuss legislative and litigation reports, and update the public about what is going on at the Commission. The hearings are open to the public and time is allotted for public comment.

Committee meetings occur as necessary, as dictated by the committee chair. Whenever possible, committee meetings will be noticed two days prior and the public may listen to deliberations.

The FPPC updates its regulations, manuals and forms to address changing circumstances in California on a regular basis. When these updates happen, the FPPC may hold an Interested Persons Meeting. These meetings allow the public to provide feedback and recommendations on the FPPC rulemaking process.

MONITORING

The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the Fair Political Practices Commission monitoring practices are implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Loressa Hon, Chief of Administration.

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The FPPC's Administration Division will coordinate all monitoring activities and is integrating formal

ongoing monitoring activities into existing practices used to manage its resources and operations, such as conducting separate evaluations and regularly meeting with the executive management team on a monthly basis during strategic planning meetings to address and document all results and/or to develop corrective action plan to address results and outcomes. The frequency of monitoring activities will be evaluated on a case-by-case basis, determined by factors such as risk priority, critical budget and project deadlines, timelines, urgency, staff experience, subject matter difficulty, and uniqueness.

FPPC has established a bi-annual internal control (IC) review led by the executive management team that was designed to provide reasonable assurance on the achievement of the entity's objectives with regard to the reliability of financial reporting, effectiveness and efficiency of operations, and compliance with applicable laws and regulations. IC over the safeguarding of assets against unauthorized acquisition, use, or disposition may include controls related to financial reporting and operations objectives. Through a risk assessment and evaluation review, executive management team will discuss the timeframe for deficiencies to be remedied and will work to remedy any issues identified. The FPPC has a policy that all deficiencies will be mitigated as soon as possible.

The Fair Political Practices Commission have implemented and documented the ongoing monitoring processes as outlined in the monitoring requirements of California Government Code sections 13400-13407. These processes include reviews, evaluations, and improvements to the Fair Political Practices Commission systems of controls and monitoring.

RISK ASSESSMENT PROCESS

The following personnel were involved in the Fair Political Practices Commission risk assessment process: executive management, middle management, and front line management.

The following methods were used to identify risks: brainstorming meetings, employee engagement surveys, ongoing monitoring activities, audit/review results, other/prior risk assessments, external stakeholders, consideration of potential fraud, and performance metrics.

The following criteria were used to rank risks: likelihood of occurrence, potential impact to mission/goals/objectives, timing of potential event, and potential impact of remediation efforts.

Due to the nature of the Commission and its mission of promoting integrity in government, the ongoing evaluation of the integrity of its systems and controls is of utmost importance. The executive management team of the Commission meets monthly on Strategic Planning, which covers the Commission's objectives, mission and priorities. Risk assessments were prepared, evaluated and revised as needed basis. The Commission is aware that management is responsible for establishing and maintaining a system of internal controls within our agency. The agency meets the objectives of internal control, which are to provide reasonable, but not absolute, assurance that: Assets are safeguarded against loss from unauthorized use or disposition. Transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of reliable financial statements. Financial operations are conducted in accordance with policies and procedures established in the State Administrative Manual, and certain other state laws and regulations, as well as the Commission's policies and procedures. There is a basic foundation upon which a structure of public accountability must be built in order to minimize fraud, errors, abuse, and waste of government funds. System requirements are communicated to employees. FPPC has a plan of organization that provides segregation of duties appropriate for proper safeguarding of FPPC assets.

FPPC has a plan that limits access to state agency assets to authorized personnel who require these assets in the performance of their assigned duties. Personnel have been trained, commensurate with their responsibilities. Technology infrastructure supports the completeness, accuracy, and validity of information processed.

A collaboration effort through executive management team resulted in the selection of risks and controls to test. The result of the control testing were communicated to all senior management for their review and feedback. The review identified and evaluated potential risks to the Commission and tests the critical controls necessary to mitigate the threats identified during the risk assessment process. In addition, executive management held a series of meetings to discuss the 2021 report. The discussion focused on the risks and controls to mitigate these risks in the Commission's current environment. A consensus was reached that the significant Commission wide risks and corresponding controls were properly identified and articulated. A matrix identifying threats to the agency and controls was developed by the Administration Division in coordination with key personnel from each division and with executive management meeting to provide input and finalize recommendations. The current 2021 report was spearheaded by the Administration Division with a review of the Commission's control environment and critical mission.

RISKS AND CONTROLS

Risk: Knowledge Transfer

The Commission relies on specific individuals with significant knowledge and expertise in key areas which makes the department vulnerable if they leave, retire, or are temporarily absent.

1. Small agency with limited positions creates challenges on cross-training and backups.
2. Employees that had left during this calendar year with suitable replacements but less expertise.
3. Staff expert is relied upon exclusively without any backup to assist in his/her absence.

Control: A

Continue to develop and implement a comprehensive workforce development plan to prepare staff to fill key positions.

- Identify gaps in the workforce development plan and develop solutions to address the gaps.
- Continue to provide Development Training for multiple levels of staff.
- Continually assess employee demographic information and career plans to anticipate staff attrition.
- Discuss topics monthly at strategic planning meeting.

Control: B

Formalize and implement a comprehensive workforce development plan. The components of the plan should include:

- Recruitment and hiring strategies
- Training, coaching and leadership programs

- Performance evaluations and improvement strategies
- Promotional processes

Control: C

Develop and maintain documentation that captures key, relevant, and/or historical information and specialized unit processes.

- Determine where information and documentation is maintained using established file structure.
- Identify and inventory information and documentation available.
- Identify information and documentation gaps.
- Develop and/or revise information and documentation to close gaps.

Risk: Technology Security

Potential internal acts threatening the integrity, safety, or privacy of information.

- Staff accidentally altering important files
- Unintentional release of confidential information
- Failing to follow internal security procedures such as inappropriate password sharing or failing to lock computer
- Access levels allow users to view unauthorized information
- Inadequate process to discourage or identify unauthorized access

Control: A

Upgrade the Commission cybersecurity software, as well as upgrade our firewall product.

Control: B

Periodically sending reminder to staff and phishing email attempt to ensure compliance.

Control: C

In order to mitigate this risk, we have hired one Information Security Officer (ISO) and one an assistant ISO. Both have attended the Department of Technology's security training. They have implemented an annual review of our agency's risk assessment on data security.

Risk: Emergency Telework

In March of 2020, the State of California declared a state of emergency due to the COVID-19 pandemic and encouraged all state agencies to consider viable options for telecommuting. The Commission continued its focus on improving technology for both efficiency and transparency and on ensuring the continuity of the critical functions of Commission business. The Commission was successful in launching the technology readiness program for the entire agency to telecommute from home. The Commission has also continued to conduct the monthly public Commission hearing virtually by using collaboration tools to hear and vote on enforcement matters, adopt regulations, discuss legislative and litigation reports, and update the public about other Commission matters.

Risk includes disruption to operation, operational impacts to efficiency due to adequacy of training or transitioning to a telework environment.

Control: A

Ensure that you have the information technology and infrastructure needed to support employees who may be able to work from home and Commission to continue our core functions.

- a. Inventory all IT critical services that need to be accessed remotely
- b. Identify the best way to access each of the critical services
- c. Intranet web applications (Office 365)
- d. Virtual Desktop Infrastructure
- e. Virtual Private Network access
- f. Wide Area Network (WAN) bandwidth requirements
- g. Collaboration tools (Teams, Webex, Zoom)
- h. Business applications (Salesforce)
- a. Intrusion Prevention System (IPS) capacities
- j. Firewall and security, etc.
- k. Solution for public to remotely access and participated during public meeting

Control: B

1. Determine which critical employees cannot telework and need to continue to report to the office and establish appropriate physical distancing protocols to reduce risk in the office.
2. Establish a telework or rotational telework schedule for all other employees who are eligible for telework.
3. For anyone whose job duties are not critical to the continuity of operations, and are not viable for telework, a review should be conducted to determine if the employee can be redirected to other work that is either critical (#1) or eligible for telework (#2).
4. As a last resort, for anyone who is not eligible for telework and cannot be redirected, Administrative Time Off (ATO) may be provided, regardless of available leave balances. All staff on ATO should be provided with directions on how to stay in contact with management for assignment of duties.
5. In establishing telework schedules, FPPC prioritize those employees who are considered at greatest risk and employees who are impacted by school closures.

Risk: Litigation

A lawsuit could be filed for incorrectly interpreting the law when regulations are created or amended, or for issues related to the Political Reform Act.

Control: A

The FPPC holds an Interested Person Meeting and provides an Information Page For Interested Persons Meetings and Opportunities for Public Comment. The website is intended to assist members of the public and regulated community who wish to join our Interested Persons process, or who simply wish to find up-to-date information on key policy discussions underway at the FPPC. Additionally, the Commission meets monthly to hear and vote on enforcement matters, adopt

regulations, discuss legislative and litigation reports, and update the public about what is going on at the Commission. The hearings are open to the public and time is allotted for public comment.

In addition, the Committee meetings are open to the public and members of the public have direct access to interact with the members of the FPPC, both Commissioners and staff.

CONCLUSION

The Fair Political Practices Commission strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

Galena West, Executive Director

CC: California Legislature [Senate (2), Assembly (1)]
California State Auditor
California State Library
California State Controller
Director of California Department of Finance
Secretary of California Government Operations Agency