



## 2021 Statement of Economic Interests (SEI) – Form 700 Filing Officer Informational Fact Sheet Multi-County Agencies

### **What is new:**

**Regulations 18115, 18115.1 and 18115.2 have been updated.**

### **FPPC Contacts**

Christine Chen

[Form700@fppc.ca.gov](mailto:Form700@fppc.ca.gov) 916-324-7602

### **Annual Deadline: April 1, 2021**

*(Late fine will be imposed if the statement is filed passed the due date.)*

Filers whose statements are forwarded to FPPC will use either their agencies' FPPC certified electronic filing system or FPPC's electronic system to file their Form 700s.

*Answers to reporting questions:*

Call: 1-866-275-3772

E-mail: [advice@fppc.ca.gov](mailto:advice@fppc.ca.gov)

*Please send questions regarding electronic filing to [Form700@fppc.ca.gov](mailto:Form700@fppc.ca.gov).*

*Training Workshops and Webinars:*

[Training](#)

*Watch our on-demand video and sign up for workshops and webinars!*

Continue to check for [dates and locations](#)

### **Your Checklist for Agencies Using FPPC's E-Filing System**

- **Keep filers' information current in the electronic system including assuming and leaving office information (Regulation 18115, 18115.1 and 18115.2)**
- Make statements accessible to the public during your regular business hours. Requestors may remain anonymous. (Sec. 81008)

### **For statements retained by your agency:**

- Supply filers disclosure categories and forms or a link to a website where filers can download a form.
- Conduct a facial review on all statements, and a full review on at least 20% of timely filed statements and on all late statements.
- Follow up on non-filed statements and make enforcement referrals, if necessary. Use the Notification Guidelines on the FPPC website for guidance.

### **Your Checklist for Agencies Using Their Own E-Filing System**

- Keep filer information current in both your agency's system and the FPPC system (system automatically notifies filers).
- Effective January 1, 2018, your agency's systems are required to allow electronic data exchange with the FPPC electronic system for Form 700 statements that are filed electronically and required to be forwarded to the FPPC. **Please ensure the information in your system exactly matches FPPC's system. (Regulation 18115, 18115.1 and 18115.2)** Check the data exchange to confirm transmission.
- Communicate with FPPC regularly about filer status.
- Provide public access.

### **For statements retained by your agency:**

- Keep filer information current (system automatically notifies filers).
- Conduct a facial review on all statements, and a full review on at least 20% of timely filed statements and on all late statements.
- Follow up on non-filed statements and make enforcement referrals, if necessary. Use the Notification Guidelines on the FPPC website for guidance.
- Provide public access.
- Keep originals for seven years. (Sec. 81009)
- Continue to monitor when assuming office, leaving office, and candidate statements should be filed.



## 2021 Statement of Economic Interests (SEI) – Form 700 Filing Officer Informational Fact Sheet Multi-County Agencies

### ➤ Gift Limit

The gift limit for 2020 was \$500 which remains in effect until December 31, 2020. As of January 1, 2021, the gift limit is \$520 (2021-2022). For more information on gift limits and disclosure, review the Gift, Honoraria, Travel & Loans fact sheet on our website.

### Appointments – Form 806

Do your agency members receive \$250 or more to serve on **other** boards or commissions? Click [here](#) for Form 806.

### New Positions – Form 804

Regulation 18734 requires an individual hired for a position not yet covered under your agency's conflict of interest code to file Form 700 if the individual serves in a position that makes or participates in making governmental decisions.

Use of the Form 804 helps agencies identify new positions and disclosure requirements for individuals serving in new positions. Use of the form is recommended as it promotes uniform reporting among agencies. Form 804 is retained at your agency and is found [here](#).

**Example:** Your agency recently hired an IT Specialist. This is a brand-new position, and thus is not yet included in your agency's conflict of interest code. Because this individual will make decisions on purchasing computer software, the position must be added to the code. In the meantime, this person will file Form 700 under the broadest disclosure category (or limited disclosure if provided for on Form 804) until the code is amended to include this position.

### Your Checklist - Paper

- **Date stamp all paper statements**
- **Notify filers about the deadline**
- Provide the agency's conflict of interest code; the disclosure categories must be known when an individual completes the form.

- Make statements accessible to the public during your regular business hours. Requestors may remain anonymous. (Sec. 81008)
- Continue to keep filers' information current in the system. Continue to monitor when assuming and leaving office statements should be filed.

### ***For original statements that you forward to the FPPC that aren't e-filed:***

- Forward assuming, annual, and leaving office statements to the FPPC within five days of the filing deadlines. Remember to send the actual "wet signature" SEI and not a copy.
- Keep copies for four years. (Sec. 81009)

### **Send Statements to:**

Fair Political Practices Commission  
1102 Q Street, Suite 3000  
Sacramento, CA 95811

**If a filer passes away, please notify your FPPC Contact. This way a notice will not be sent to the family.**

**Make sure you are giving out the correct year forms and amendments.**



## 2021 Statement of Economic Interests (SEI) – Form 700 Filing Officer Informational Fact Sheet Multi-County Agencies

### Electronic Filing Specific FAQs

**Q** – Do all my filers use FPPC’s new electronic filing system?

**A** – No. The system will only be used by those filers whose statements are forwarded to FPPC. Statements from all your other filers will be processed at your agency as they have been in previous years.

**Q** – As a filing officer, how do I begin using FPPC’s new system?

**A** – All filing officers received an e-mail from the FPPC that provided a login ID and training guide. If you haven’t already done so, verify your agency’s filers’ information to ensure accuracy and to provide a current e-mail address for each filer. This effort will replace the annual requirement of reviewing and submitting the Article II list.

**Q** – What happens once my filers’ information has been updated?

**A** – Once your filers’ information is updated, they will receive an e-mail which provides a login ID and password that they use to file their Form 700. The e-mail also provides access to a video that explains how to file statements online.

If you have added new filers since your first update, or if you have filers who left since then, the system will generate e-mails to those filers notifying them to complete their assuming or leaving office statement.

**Q** – What about filing expanded statements when a filer holds more than one position?

**A** – New Regulation 18723.1(a) defines “Expanded Statement of Economic Interests, (ESEI)” “primary position,” and “additional position” for purposes of the regulation. Subdivision (c) would authorize, but not require, an official with multiple positions subject to filing obligations to file an ESEI for each position, rather than a separate and distinct SEI for each position. That provision

would also specify processes for filing such a statement: the original ESEI is filed for the official’s primary position and a copy of that ESEI is filed for each additional position, as specified.

### General FAQs

**Q** – A board member is already filing a statement for her position as a city council member. Must she file a statement for her position on our multi-county agency?

**A** – Yes, because the jurisdiction and disclosure requirements for the multi-county position are different, she must either file an expanded statement for both positions or file a separate statement for the multi-county agency. Instructions for completing expanded statements are included in the Form 700.

**Once a form is filed, the statement cannot be altered, not even by the filer.**

**Q** – I have a filer on military leave. Do I send the Form 700 overseas for the filer to complete?

**A** – No. Simply note this in your log (or, in the case of an individual whose statement is forwarded to FPPC, notify us) and have the individual file his/her annual statement upon returning.

**Q** – Is an amendment request necessary if the “total number of pages” line on the Cover Page is left blank?

**A** – No. Listing the total number of pages included with the Form 700 filing is not required by law; it is included simply as a tool to ensure that all pages are received.

**Q** – Does a board member who has been reappointed, or an employee who moved from one designated position to another designated position within our agency, have to file a leaving office and an assuming office Form 700?



## 2021 Statement of Economic Interests (SEI) – Form 700 Filing Officer Informational Fact Sheet Multi-County Agencies

**A** – No. As long as there was not a break in service of 30 days or more, the person will continue to file annual statements. However, there may be changes to the filer’s disclosure category.

**Q** – A newly appointed planning commissioner assumed office on October 15, 2020 and filed an assuming office statement. Must he file an annual statement on April 1, 2021?

**A** – No, any filer who assumed office between October 1 and December 31, 2020, and filed an assuming office statement does not need to file an annual statement until April 1, 2022. The period covered on the newly appointed planning commissioner’s statement will be October 16, 2020, through December 31, 2021.

**Q** – The executive director for a multi-county agency is required to file a Form 700. He left office and filed a leaving office statement. An interim executive director has been hired from outside the agency. Are persons serving in interim positions required to file statements?

**A** – Yes, persons serving in interim positions must file statements in the same manner as if they were holding the positions permanently.

**Q** – A board member appoints a designee to serve when she cannot attend a meeting. Must the designee file a Form 700?

**A** – Yes, the designee must file an assuming office statement.

**Q** – My filers make a lot of mistakes on Parts 1 through 3 of the Cover Page. May I complete that information for them?

**A** – Yes, so long as you do so prior to having them complete their schedules. Once they have signed the form, you cannot make any changes to their statement. Any amendments must be completed by the filer on the appropriate amendment schedule.

**Q** – Although we are approved by FPPC for e-filing of the Form 700, some filers email scanned copies of signed statements instead of filing electronically. Are these acceptable?

**A** – No. If a filer chooses not to file electronically, an original signature is required.

**Q** – What are my responsibilities for an unsigned statement that must be forwarded to the FPPC?

**A** – Unless you can quickly obtain the signature before it is date stamped, please forward the unsigned statement to the FPPC for follow up.

**Please do not use acronyms when listing agency names.**