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August 19, 2026

Adam E. Silver, Chair

Fair Political Practices Commission

1102 Q Street, Suite 3050

Sacramento, CA 95811

Subject: Concerns Regarding Proposed Amendments to Regulation 18723.1

Dear Chair Silver:

On behalf of the California Municipal Clerks Association (CMCA), we respectfully submit comments regarding the proposed amendments to Regulation 18723.1 concerning Statement of Economic Interests (Form 700) filings for officials who hold multiple positions.

Municipal clerks serve as filing officers for officials and employees designated under local conflict-of-interest codes. We appreciate the Commission's efforts to simplify filing requirements and reduce unnecessary duplication. However, we are concerned that some of the contemplated changes could make it more difficult for local filing officers to determine whether officials have properly satisfied their filing obligations.

Loss of Direct Filing Verification

We are particularly concerned about the possibility of allowing an official who holds a Section 87200 position and a code-designated position in an agency with a broader geographic jurisdiction to file an Expanded Statement only with the FPPC, rather than also with the applicable code agency.

Under the current process, receipt of the Expanded Statement provides the filing officer with direct and reliable confirmation that the filing obligation associated with the local position has been satisfied. Eliminating that notification would remove an important part of the local agency's compliance process.

Greater Risk of Filing Errors and Amendments

The proposed approach may also create confusion for filers. An official whose code-designated position is with an agency that has a broader geographic jurisdiction than the official's Section 87200 position could inadvertently fail to properly identify the broader jurisdiction applicable to the filing. Further, assuming and leaving office statements would also be required to be filed separately with the code-designated position agency.

If the code-designated position or applicable jurisdiction is not clearly identified on the Expanded Statement and the local filing officer does not receive a copy, the error may not be discovered promptly. This could result in filing officers having to request amendments after the fact and create uncertainty for both the filer and the agency as to whether the filing obligation was properly satisfied.

Administrative Burden and Risk of Incorrect Non-Filer Determinations

Without receiving the Expanded Statement or another direct notification, local filing officers would need to independently search FPPC records, locate the applicable filing, reconcile it against their own filer lists, and determine whether it properly covers the position and jurisdiction they administer.

For agencies with multiple officials serving in overlapping jurisdictions, this would create a recurring manual verification process that does not exist today. It would also increase the risk that a filing is overlooked or cannot readily be matched to the local position, resulting in unnecessary follow-up or an official being incorrectly identified or referred as a non-filer. Given this additional workload, CMCA also encourages the Commission to reconsider the conclusion that the proposed changes would have no fiscal impact on local government.

Need for a Reliable Verification Process

CMCA supports efforts to streamline Form 700 filing, reduce duplicative administrative work, make compliance easier for filers, and improve transparency for the public. Ideally, a filer could submit an Expanded Statement through the FPPC's filing system, identify all applicable

positions and jurisdictions, and have the filing automatically transmitted to the appropriate local agencies. We would welcome the opportunity to work with the Commission on solutions that simplify the process for all parties while preserving the information local filing officers need to verify compliance.

We therefore respectfully request that the Commission retain the existing filing and notification requirements unless and until an alternative mechanism is available that provides applicable code agencies with timely and reliable notice of the filing, the positions and jurisdictions it covers, and any information necessary to confirm compliance.

Thank you for considering the perspective of municipal clerks who serve as local filing officers as the Commission evaluates these amendments.

Sincerely,



Kerry Bigelow

Legislative Director, California Municipal Clerks Association

CC: Alf W. Brandt, Commissioner
Elsa Ortiz, Commissioner
E. Dotson Wilson, Commissioner