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Profile in Public Integrity:

Heather Holt

Executive Director, Los Angeles City Ethics Commission



Heather Holt is in her sixth year as the Executive Director of the Los Angeles City Ethics Commission. Before joining the Ethics Commission in 2006 as the Director of Policy and Legislation, Holt served as an ethics officer for the Los Angeles County Metropolitan Transportation Authority. She has served as legal and policy counsel to several cities in San Diego County, the United States House of Representatives, the federal Environmental Protection Agency, and the Maine State Legislature. She has also served as the director of a nonprofit agency that provides assistance to military families. A Southern California native, Holt holds a Juris Doctorate from Pepperdine University School of Law and a Bachelor of Arts from Washington State University.

You have worked at the Los Angeles City Ethics Commission for 10 years, and are now in your sixth year as executive director. Which of the Commission's achievements are you most proud of?

One of the achievements that I am most proud of is our effort to educate our constituents and those we regulate. Part of creating a culture of trust in government is ensuring that those who must abide by the rules understand what they have to do to comply and why complying is important. This outreach effort helps people avoid enforcement activity and also gives the public the transparency and accountability that they voted for when they created the Commission. It has also created a type of partnership with the people we regulate. They know that there are ramifications for violating the laws, but they also know that we will be here to provide compliance assistance—we now average over 20,000 compliance assistance contacts each year.

I started with the Commission as the Director of Policy, so I am also proud of our legislative accomplishments. In the past five years, we have undertaken detailed, comprehensive reviews of our campaign financing laws and public ethics laws and completely revamped them to reflect lessons we had learned in nearly 25 years of administering them, the input we received from our regulated communities, best practices in other jurisdictions, and even changes in technology. We constantly review our laws to ensure they are as strong and clear and fair as they can be—which also helps our education efforts.

What have been some of the hardest challenges you faced at the Commission?

When I took over as Executive Director, the City was going through one of the toughest financial periods in its history. The Commission's staff had been cut from 31 positions to 17. And at the same time, our workload was increasing with a number of new legal mandates. Continuing to provide the public with the services they expect and deserve, while wondering every year if additional cuts were coming, took its toll on the entire staff. My focus during this challenging time was to streamline our processes for more efficiency, such as implementing entirely electronic filings in all three of our program areas, and to communicate with our elected officials that, even in fiscally tough

times (perhaps especially then), it is important to maintain compliance, oversight, and public trust. We survived this period with no further cuts, and the City is on its way to financial recovery. Our staff is back up to 23 positions, and my goal is to keep growing until we reach our previous staffing levels.

Los Angeles has gone through cultural, economic, and political changes over the last 20 years. How has your office's work shifted to keep pace?

The technological leaps that we, as a society, have taken in the 25 years since the Ethics Commission was created have had a tremendous effect on our laws. For example, laws written around the assumption that all campaign communications have a paper form are antiquated. We have had to update the way we think about communication and the way our laws work in that context. We have also harnessed that technology to improve our outreach to communities that might not typically be aware that we exist. For example, we send electronic notices about our work to over 9,000 subscribers and we provide a translation tool on our web site to make our data as accessible as possible.

What are the most critical changes that Los Angeles City or County, or the State of California, could make to boost oversight and reduce opportunities for public ethics violations?

It's pretty simple—on paper. To boost oversight, more resources have to be dedicated to oversight agencies. The good work they do requires sufficient funding, which can be a tough decision when residents are concerned about public safety and potholes. My recommendation would be that every jurisdiction legislate minimum funding levels for their oversight agencies, with automatic adjustments for inflation. This ensures that agencies have the funding they need and also takes the politics out of the budget process.

To reduce opportunities for violations, education is critical—not just for those who are regulated, but also for citizens and government employees. We need to help them understand what is and what is not a violation of the law. We see a noticeable increase in whistleblower complaints when employees complete their mandatory ethics training. Government employees care about good government, too; when they learn that certain activity is illegal, they care enough to alert us when they see it. But effective education costs money, which is another reason why sufficient funding is important and why these approaches are much easier on paper than in practice.

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CAPI aims to become a hub of the public integrity community, to improve the capacity of public offices and practitioners to deter, identify, and combat corruption. How can CAPI best serve practitioners like you on the front lines of ethics enforcement?

One option would be to interact with practitioners, to find out what their data analysis needs are. It is extremely helpful for practitioners to know which laws are working, what improvements could be made, and how they compare to laws in other jurisdictions. This often requires extensive data gathering and analysis, which can be challenging for under-staffed agencies. It would also help practitioners if the data analysis were presented in context and in a way that is easy for non-practitioners to understand. In other words—to echo my previous comments—help on the education front would be valuable.