



VERMONT STATE ETHICS COMMISSION

Fiscal Year 2026 Budget Request

Christina Sivret, Executive Director



Fiscal Year 2026 Budget Request

**V E R M O N T S T A T E
E T H I C S C O M M I S S I O N**

*Paul Erlbaum, Chair
Christina Sivret, Executive Director*

Budget Development

Holly S. Ferrant, AoA Chief Financial Officer

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Harley Oliver, Financial Director II

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*Fiscal Year 2026 Budget Request
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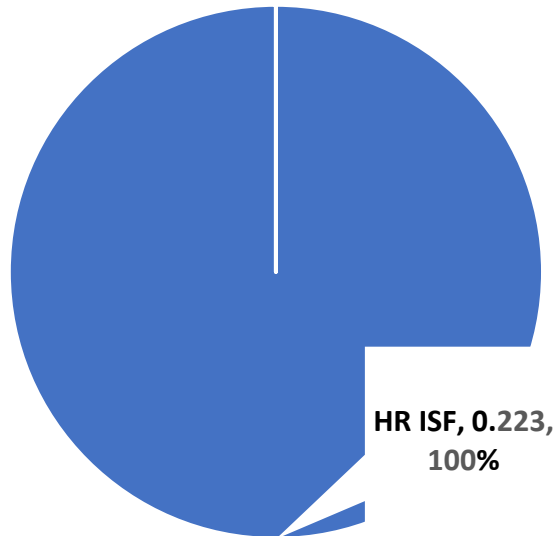
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Vermont State Ethics Commission, FY 2026 Governor's Recommended Budget

MISSION: The State Ethics Commission provides governmental ethics training to all State of Vermont employees and public servants; receives, reviews, and refers complaints regarding governmental misconduct; issues ethical guidance and advisory opinions interpreting the State Code of Ethics; and receives and posts Executive Officer Financial Disclosure Forms for public accessibility.

Governor's Recommended Budget FY26 (\$.223 millions)



FY 2026 SUMMARY & HIGHLIGHTS

- The Vermont State Ethics Commission presents a \$223,562 budget.
- Updated Annual Report for 2024.
- Received 23 complaints, 47 complaint Inquiries, 1 advisory opinion requests, and 36 guidance requests in 2024.
- Developed an online municipal ethics training available to all municipal officials and members of the public.
- Worked on the implementation of Act 171, established a statewide municipal code of ethics, expanded financial disclosure requirements, and expanded the Commission's authority to advise on and investigate State ethics complaints.



VERMONT STATE ETHICS COMMISSION

2024 ANNUAL REPORT

Submitted to the General Assembly January 17, 2025

"Ethics is knowing the difference between what you have a right to do and what is right to do."

-Potter Stewart

6 Baldwin St.

Montpelier, VT 05633-7950

<https://ethicscommission.vermont.gov/>

This report: <https://ethicscommission.vermont.gov/reports>

COMMISSION MEMBERS

Paul Erlbaum (Chair)

Appointed by the League of Women Voters of Vermont

Christopher Davis, Esq.

Appointed by the Vermont Bar Association

Michele Eid, CPA

Appointed by the Board of Directors of the Vermont Society of Certified Public Accountants

Sarah Butson, Esq.

Appointed by the Vermont State Council of the Society of Human Resource Management

John “Jack” Kennelly, Esq.

Appointed by the Chief Justice of the Vermont Supreme Court

Will Stevens

Appointed by the Senate Committee on Committees

EXECUTIVE DIRECTOR

Christina Sivret, Esq.

ADMINISTRATIVE ASSISTANT

Peggy Delaney

For Commissioner biographies see: <https://ethicscommission.vermont.gov/about-us/biographies>

INTRODUCTION

Pursuant to 3 V.S.A. § 1226, the Vermont State Ethics Commission (“Commission”) submits its annual report to the General Assembly for calendar year 2024. As required by statute, this report summarizes the number and types of complaints made to the Commission and the disposition of those complaints; summarizes guidance provided by the Executive Director to State of Vermont public servants; provides an estimate of the number of trainings on the State Code of Ethics conducted by each branch of government; summarizes training activities undertaken by the Commission; and gives recommendations for legislative action to address governmental ethics.

ETHICS COMMISSION STAFF and RESPONSIBILITIES

The Ethics Commission is made up of six volunteer commissioners, one part-time Executive Director, and one part-time Administrative Assistant. The Commission anticipates that a seventh commissioner will be appointed by the Speaker of the House in the coming months. It holds regular, public meetings at 10 a.m. on the first Wednesday of each month. The Executive Director’s responsibilities include setting meeting agendas; responding to inquiries and requests for advice; drafting all Ethics Commission documents, including complaint-related correspondence to advisory opinions; engaging in strategic planning; formulating policy; providing ethics education; testifying before the Legislature; and responding to media inquiries. Prior to 2022, the Executive Director was the Commission’s only employee. In 2022, the Commission hired a part-time administrative assistant to handle the administrative tasks of the Commission.

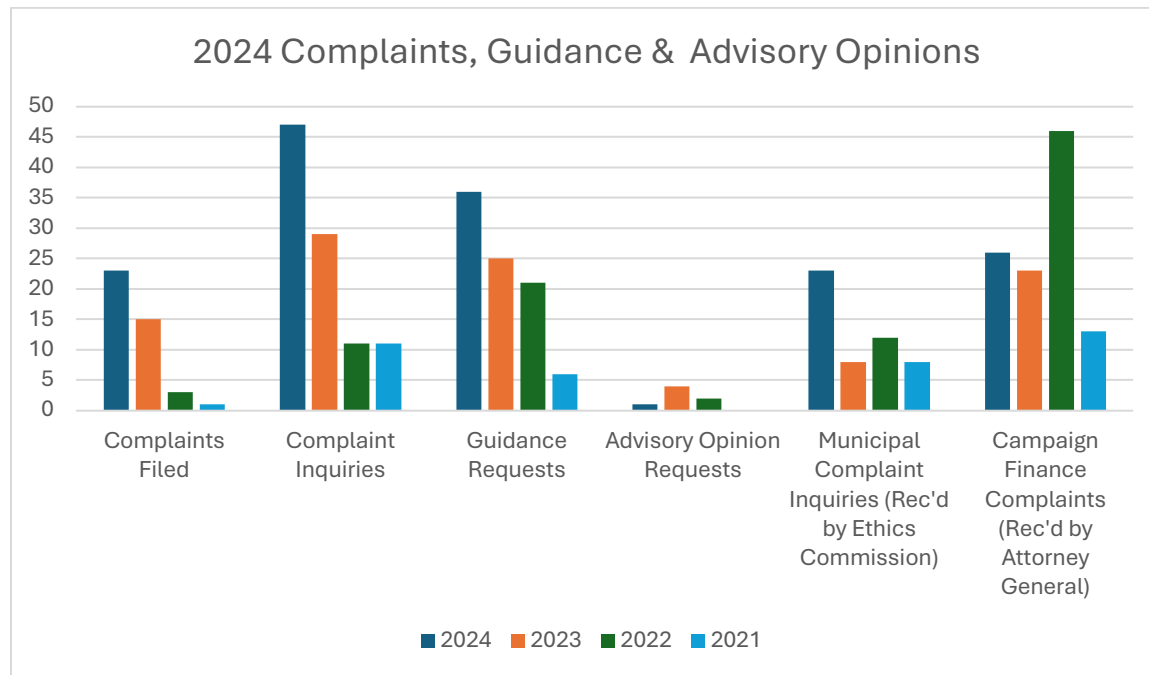
COMMISSION AUTHORITY

The Commission has the authority to receive, review, and refer for investigation, written complaints from any source regarding government ethics in any branch of State government, as well as complaints about violations of the State’s campaign finance laws. 3 V.S.A. § 1223(a)-(b). The Commission also has the authority to receive, review, and refer for investigation written complaints from any source regarding violations of the new statewide Municipal Code of Ethics. 3 V.S.A. § 1223(b)(5).

Upon request, the Commission may also issue non-binding ethical Guidance and Advisory Opinions to State of Vermont public servants and to municipal officers subject to the statewide Municipal Code of Ethics. Guidance must relate to the requester’s own actions and is confidential unless the recipient chooses to disclose it. 3 V.S.A. § 1225(a). Advisory Opinions also must relate to the requester’s own conduct, do not contain any personally identifying information, and are posted to the Commission’s website within thirty days of issuance. 3 V.S.A. § 1225(b). Guidance and Advisory Opinions for State of Vermont public servants are formulated by interpreting and applying the State Code of Ethics, which went into effect on July 1, 2022. Guidance and Advisory Opinions for municipal officers are formulated by interpreting and applying the statewide Municipal Code of Ethics, which went into effect on January 1, 2025.

Starting September 1, 2025, the Commission will have the authority to investigate ethics complaints, hold hearings, make findings, and issue warnings, reprimands, or make recommendations regarding unethical conduct in State government only. 3 V.S.A §§ 1227-1229. However, the Commission’s ability to act upon this authority will be dependent upon the legislature allocating increased staffing and resources for the Commission for FY26.

In addition to the above, the Commission also serves as an educational resource for all State of Vermont public servants and municipal officers subject to the statewide Municipal Code of Ethics, providing online ethics training on demand and in-person trainings upon request.



COMPLAINTS

The Complaint Process

Any person can submit a confidential written complaint to the Ethics Commission regarding ethical conduct in State or municipal government, or violations of campaign finance law. 3 V.S.A. § 1223. Complaints are filed using the [complaint form](#) found on the Commission’s website. Once received, the Executive Director performs a preliminary review of each complaint to determine whether the complaint should be referred for further action, closed, or whether additional information is required to make a determination. A complaint may be closed if the subject matter of the complaint does not implicate governmental ethics or campaign finance law. When a complaint is referred for further action, the receiving entity uses its own policies and procedures to investigate and to decide what, if any, action to take. Where a complaint alleges unethical conduct in State government, the receiving entity is required to consult the Commission regarding the application of the State Code of Ethics to the facts alleged in the complaint. On or before November 15 of each year, each receiving entity is required to submit data to the Commission regarding the status and disposition of cases that have been referred by the Commission. 3 V.S.A. § 1226.

Below are examples of the types of complaints the Commission might receive and refer to other entities for further action.

- Complaints alleging a crime, a violation of governmental conduct regulated by law, or a violation of campaign finance law are referred to the Attorney General or the relevant State’s Attorney.

- Complaints alleging a violation of the Department of Human Resources Personnel Policy and Procedure Manual are referred to the Commissioner of Human Resources.
- Complaints regarding conduct committed by a judicial officer are referred to the Judicial Conduct Board.
- Complaints regarding conduct committed by an attorney are referred to the Professional Responsibility Board.
- Complaints regarding conduct committed by a State Representative are referred to the House Ethics Panel.
- Complaints regarding conduct committed by a State Senator are referred to the Senate Ethics Panel.
- Complaints alleging a violation of the statewide Municipal Code of Ethics

Summary of Complaints

Twenty-three written complaints were filed with the Ethics Commission in 2024.

- Two complaints were closed without being referred due to insufficient facts to support a claim of a violation of the State Code of Ethics.
- Four complaints were referred to the Senate Ethics Panel, two were closed after additional review and inquiry and two remain open.
- Two complaints alleged violations of the Vermont Rules of Professional Conduct by attorneys and were referred to the Professional Responsibility Board.
- Two complaints were referred to the House Ethics Panel and were closed after additional review.
- Seven complaints were referred to the Department of Human Resources for further action, where they were subsequently closed after additional review and inquiry.
- Six municipal ethics complaints were closed without being referred due to the lack of a referral option.

As in prior years, the Commission received more complaint inquiries than it did formal written complaints. In addition to the 23 complaints referenced above, the Commission received 47 complaint inquiries that did not result in the submission of a formal written complaint. Complaint inquiries covered a variety of topics, including municipal ethics; retaliation; conflicts of interest; preferential treatment; misuse of resources; misuse of positions; and failure to comply with other state or federal laws, rules, or policies.

Municipal Complaints

Although the statewide Municipal Code of Ethics in H.875 (Act 171) didn't take effect until January 1, 2025, the Commission received 6 written complaints regarding municipal ethics and 23 complaint inquiries in 2024. The written complaints were closed and not referred due to the lack of a referral option.

GUIDANCE

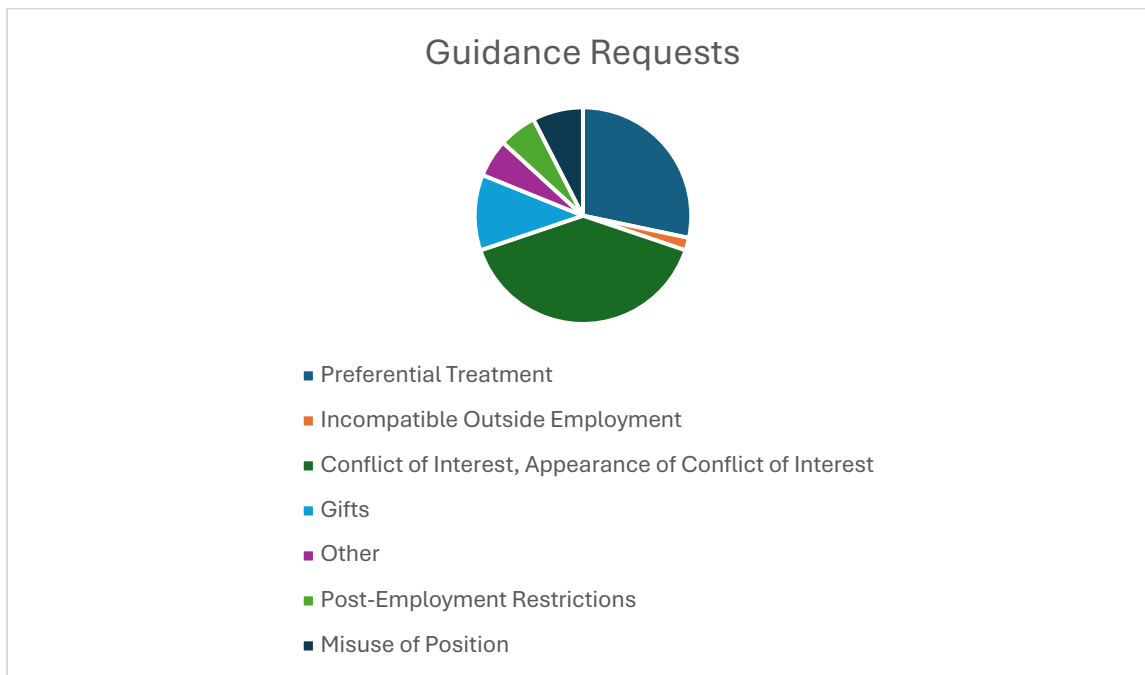
Guidance Process

State of Vermont public servants and municipal officers subject to the statewide Municipal Code of Ethics may request confidential ethics Guidance from the Executive Director of the Ethics Commission regarding the requester's own actions, including actions related to managerial decision-making responsibilities. Guidance and requests for Guidance may be oral or in writing. 3 V.S.A. § 1225(b).

Summary of 2024 Guidance Requests

Guidance requests have steadily increased since the passage of the State Code of Ethics in July 2022 and the implementation of the Code of Ethics training requirements. The Commission received 36 Guidance requests in 2024, of which 10 were from municipal officials. In some cases, requests touched on more than one topic within a single request.

- Preferential Treatment (15)
- Incompatible Outside Employment (1)
- Gifts (6)
- Conflicts of Interest and the Appearance of Conflicts of Interest (21)
- Post-Employment Restrictions (3)
- Misuse of Position (4)
- Other (3)



ADVISORY OPINIONS

Advisory Opinion Process

State of Vermont public servants may request an Advisory Opinion from the Executive Director regarding any issue related to government ethics and the requester's ongoing or prospective conduct. 3 V.S.A. § 1225(b). Starting on January 1, 2025, municipal officers subject to the statewide Municipal Code of Ethics may do the same. 24 V.S.A. § 1994(a).

In 2023 the Commission adopted and published [Advisory Opinion procedures](#), created an [Advisory Opinion request form](#), and drafted [Advisory Opinion FAQs](#), all of which can be found on the Commission [website](#).

The Commission reviews every request for an Advisory Opinion. However, the Commission may decline to issue an opinion for the following reasons:

- The subject matter of the request does not relate to the State Code of Ethics, codified in 3 V.S.A. Chapter 31, §§ 1201-1205; presents a question that falls outside the jurisdiction of the Commission; or would necessitate the interpretation of a statute outside of the Commission's jurisdiction;
- Involves past conduct that is not ongoing;
- Fails to provide sufficient factual background for the Commission to provide meaningful advice;
- Provides facts that appear inaccurate, questionable, or in dispute;
- Involves factual scenarios that are vague, highly unlikely, or overly speculative;
- Concerns rights or conduct that are the subject of pending litigation involving the requester;
- Involves an issue that is already answered by the plain language of the statute;
- The Ethics Commission determines that the advice sought would be inappropriate or not in the best interest of the public;
- The timeline specified in the request is too short to draft an opinion;
- For any other reason at the discretion of the Commission.

Requests for an Advisory Opinion are acknowledged within 5 business days of receipt. The Executive Director then reviews the request and notifies the requester whether it has been accepted, denied, or whether more information is needed to make a decision. If the request is accepted, the Executive Director will draft an Opinion for consideration by the full Commission. In drafting the Advisory Opinion, the Executive Director may consult with others who have information, facts, and/or knowledge relevant to the formulation of the opinion. The Commission endeavors to finalize Advisory Opinions within 30 days of receiving all relevant information. Final Advisory Opinions are posted on the Commission's

website within 30 days of issuance, and do not contain the requester’s personally identifying information. 3 V.S.A. § 1225(b).

Summary of 2024 Advisory Opinion Requests

The Commission received one request for an updated Advisory Opinion in 2024. The updated opinion can be found on the Commission’s website.

- [Revised Advisory Opinion No. 4-2023](#)
Topics: Boards & Commissions, Conflict of Interest, Appearance of Conflict of Interest, Good Cause, Rule of Necessity

YEAR IN REVIEW

In the first half of 2024, the Ethics Commission focused its efforts on advocating for legislation related to financial disclosure requirements, municipal ethics, and the expansion of Ethics Commission jurisdiction. In May 2024, the legislature passed H.875, which established a statewide municipal code of ethics, expanded financial disclosure requirements for Executive Officers and candidates for certain offices, and established hearing and investigatory powers for the Commission.

During the second half of the year, the Ethics Commission turned its attention to creating a free online municipal ethics training for municipal officers, and handling an increased demand for Commission services, particularly guidance requests, complaints, and complaint inquiries.

Complaints	Complaint Inquiries	Guidance Requests	Advisory Opinion Requests
44% increase 2023 v. 2024	34% increase 2023 v. 2024	44% increase 2023 v. 2024	80% decrease 2023 v. 2024
400% increase 2022 v. 2023	163% increase 2022 v. 2023	19% increase 2022 v. 2023	100% increase 2022 v. 2023

In December, Executive Director Christina Sivret, Commission Chair Paul Erlbaum, and Commissioner Jack Kennelly attended the 45th annual Council on Governmental Ethics Law (COGEL) conference in Los Angeles, CA. COGEL is a professional organization for government agencies and other organizations working in ethics, elections, freedom of information, lobbying, and campaign finance. Executive Director Sivret spoke on the panel, “I Will Survive: How Ethics Commissions Combat Existential Threats from Lawmakers, Lawyers, and More”, sponsored by the Campaign Legal Center. The other panelists were the Ethics Officer for Atlanta, and the Executive Director of the Alabama Ethics Commission. Vermont was invited to participate as a positive example of a state where ethics laws have been moving forward. The Executive Director and the commissioners also networked with government ethics professionals from other states and attended learning sessions on topics related to ethics education and training, enforcement, compliance, and professional development.

1. 2024 Legislative Efforts

Municipal Ethics

In January 2024, the Commission submitted a proposed framework for municipal ethics, as required by H.125 (Act 53). The framework was the result of research conducted throughout 2023, including

listening sessions with members of the public and municipal officials and a national survey of municipal ethics best practices. The recommendations were incorporated into two draft bills, which eventually merged to become H.875 (Act 171). H.875 was passed by the legislature in May 2024, and became law in June of 2024, with delayed effective dates in 2025 for several provisions. The primary purpose of the municipal ethics portion of the bill is to set minimum statewide standards while allowing municipalities to adopt supplemental (or maintain existing) ethics policies that do not conflict with the statewide code. The bill established a statewide Municipal Code of Ethics, with an effective date of January 1, 2025, and allows the Commission to provide municipalities with free training and advisory services; requires municipalities to investigate and record ethics complaints, which can be filed either with the municipality or with the Ethics Commission; requires municipalities to appoint an Ethics Liaison to serve as a point of contact for the Ethics Commission; and requires ethics training for certain municipal officers. *The draft version H.875 contained retaliation protections for anyone filing a written ethics case with a relevant entity, such as the State Ethics Commission, the municipality, the courts, or the Office of the Attorney General. However, in a decision the Ethics Commission strongly disagrees with, these protections were largely removed from the final version of the bill.*

Financial Disclosure

In addition to addressing municipal ethics, H.875 expanded financial disclosure requirements for Executive Officers and candidates for non-federal statewide office, state senate, and state representative to bring them more in line with national best practices. Starting January 1, 2026, filers will be required to disclose individual stock holdings valued at \$25,000 or more; interests in virtual currencies or trusts valued at \$25,000 or more; municipal or State bond holdings issued in Vermont valued at \$25,000 or more; non-commercially reasonable loans made outside the ordinary course of business; and ownership interests in companies with business before municipal or State government. Financial disclosure will also be required for candidates for county office. Significantly, H.875 also established financial penalties of ten dollars a day, up to a maximum of \$1,000, for the late or non-filing of financial disclosure forms.

Expansion of Commission Authority

Pursuant to H.875, beginning September 1, 2025, the Commission will have the authority to investigate, hold hearings, and issue findings regarding alleged ethical misconduct in State government. In cases where hearings conclude that unethical conduct has been committed, the Commission will be able to issue warnings or reprimands and recommend actions. This can include facilitated mediation, additional training and education, referrals to counseling and wellness support, or other remedial actions.

Commission Membership

H.875 also expanded the Commission's membership from five members to seven, adding one member to be appointed by the Speaker of the House and one to be appointed by the Senate Committee on Committees. As of January 2025, only the Senate Committee on Committees has appointed a new member. The Speaker of the House is expected to do so in 2025.

2. Ethics Data Collection

Pursuant to 3 V.S.A. § 1226(a), certain State entities are required report to the State Ethics Commission aggregate data on ethics complaints not initially submitted to the Commission, with the complaints separated by topic, and the disposition of those complaints, including any prosecution, enforcement action, or dismissal. In 2024, the reporting period covered June 10th, 2024 - the effective date of the

legislation - through November 15th, 2024. The data received from the various required reporters is summarized as follows:

A. Office of the Attorney General

The Office of the Attorney General is required to report complaints it receives regarding governmental misconduct, including campaign finance violations, to the Ethics Commission. 17 V.S.A. § 2904a. In 2024, their office reported 28 open campaign finance violation complaints. The Attorney General closed 22 cases in 2024 (including 13 that were filed in 2022; 1 from 2023; and 8 from 2024). Currently, the Attorney General reports 19 open complaints, and one open matter that arose from independent review.

B. The Department of Human Resources

The Department of Human Resource reported that it received one complaint implicating the ethics concepts reflected in the Stated Code of Ethics and in relevant policies in DHR's Personnel Policy Manual that was not referred by the Ethics Commission. The allegations in the complaint, which arose out of the Department of Environmental Conservation, recounted conduct which, in judgment of DHR implicated the Vermont Code of Ethics provision prohibiting the misuse of government resources, 3 V.S.A. § 1203f. The matter was investigated by DHR's Investigations Unit, and at the time of this report had not yet been resolved.

C. The Office of the Court Administrator

The Office of the State Court Administrator reported that during the relevant time period it had no complaints to report pursuant to 3 V.S.A. § 1226(a)(7).

D. The Professional Responsibility Board

The Professional Responsibility Program reported that it received 13 complaints against State-employed attorneys. Of those 13 complaints, 8 were dismissed either at screening or on review of a screening dismissal by the Chair of the Professional Responsibility Board. One complaint was referred to the Bar Assistance Program. Four complaints remained pending at the time of the report. Two of the 13 complaints pertained to the requirement in 3 V.S.A. § 1203j that public servants must comply with laws, rules, and policies. Both of those cases were still pending at the time of the report.

E. The Judicial Conduct Board

The Judicial Conduct Board reported 25 complaints filed between June 10 and November 15, 2024. Of these complaints, 17 were noted as dismissed; in 3, the Board requested additional information; in 4, an "initial inquiry" had been completed and an investigation begun. One complaint was withdrawn.

F. House Ethics Panel

The House Ethics Panel reported that in 2024, it received two complaints about House members that were not referred to the Panel by the Commission. At the time of the report, the final dispositions of those complaints were still pending. Both complaints pertained to the requirement in 3 V.S.A. § 1203j that public servants comply with laws, rules, and policies.

G. Senate Ethics Panel

The Senate Ethics Panel reported on December 31, 2024 that, during the 2023-24 biennium, it received seven complaints. Six of these complaints were referred by the Ethics Commission. The Panel received an additional complaint from another source. Of the six referred by the Commission, one was referred to the Senate Sexual Harassment Panel; three were dismissed after a preliminary review determined that there was not probable cause to believe that an ethical violation had occurred; and, two of the matters remain open. The complaint that was directly received by the Panel was dismissed.

3. Ethics Training

Section 1205 of the State Code of Ethics requires all State of Vermont public servants take State Code of Ethics training within 120 days of State service and every three years thereafter. The Ethics Commission is one of five statutorily approved training providers. In 2022 the Commission partnered with the Center for Achievement in Public Service (CAPS), another approved training provider, to develop a comprehensive ethics training available to all State of Vermont public servants through the State Learning Management System (LMS) and on the Commission website.

Pursuant to § 1226(2)(B) of the Code, the Commission is required to provide an estimate of Code of Ethics trainings conducted by each branch of government in its annual report. The below numbers, broken down by branch of government, are derived from the number of people who have taken the training through LMS and the Commission website. The CAPS/Commission training is currently the only Code of Ethics training available to public servants in the executive and judicial branches of government, therefore the below numbers represent the total number of State of Vermont employees and public servants in the executive and judicial branches of government who completed the training as of December 31, 2024.

CAPS/LMS TRAINING DATA

Department/Agency	Completed	In Progress	Grand Total	Percentage Complete
Administration Agency	14	2	26	53.85
Agriculture, Food & Mrkts Agency	93	13	144	64.58
Attorney General's Office	72	2	86	83.72
Auditor of Accounts' Office	12		16	75.00
Buildings & General Services	210	16	337	62.31
Cannabis Control Board	6	1	20	30.00
Children and Families	566	42	994	56.94
Clerk of the House	4		5	80.00
Commerce & Community Dev Agency	48	6	136	35.29

Corrections	372	63	876	42.47
Defender General's Office	55	8	77	71.43
Dept of Human Resources External Users	9	1	21	42.86
Digital Services Agency	276	18	343	80.47
Disabilities Aging Ind. Living	238	13	335	71.04
Education Agency	100	9	155	64.52
Enhanced 911 Board	6	1	10	60.00
Environmental Conservation	165	18	306	53.92
Executive Office	4		13	30.77
Finance & Management	18	1	26	69.23
Financial Regulation	53	6	100	53.00
Fish & Wildlife	86	4	168	51.19
Forests, Parks & Recreation	90		153	58.82
Green Mountain Care Board	18	2	30	60.00
Health	425	34	639	66.51
Human Resources	81	1	99	81.82
Human Rights Commission	3	2	5	60.00
Human Services Agency	33	7	64	51.56
Joint Fiscal Office	14		17	82.35
Judiciary	436	7	466	93.56
Labor	198	5	219	90.41
Labor Relations Board	1		3	33.33
Legislative Offices	39	1	64	60.94
Libraries (18)	15	2	18	83.33
Lieutenant Governor's Office			2	0.00
Liquor and Lottery	27	3	76	35.53
Mental Health	136	6	198	68.69
Military	44	5	157	28.03
Natural Resources Agency	17		34	50.00
Natural Resources Board	19		26	73.08
Public Safety	427	31	727	58.73
Public Service Department	52	2	54	96.30
Public Utility Commission	18	1	26	69.23
Secretary of State's Office	39	5	74	52.70
Secretary of the Senate	2		6	33.33

Sergeant at Arms' Office	11		14	78.57
State Ethics Commission		1	2	0.00
State Treasurer's Office	25	2	42	59.52
State's Attorneys and Sheriffs	2		2	100.00
Taxes	120	9	148	81.08
Transportation Agency	1172	5	1242	94.36
Vermont Commission on Women	2		2	100.00
Vermont Criminal Justice Council	9		12	75.00
Vermont Health Access	277	18	356	77.81
Vermont Veterans' Home	35	11	163	21.47
VOSHA Review Board	1		1	100.00
Grand Total	6195	384	9335	66.36

ETHICS COMMISSION WEBSITE TRAINING DATA

Vermont Climate Council	16
Vermont Fish & Wildlife Hunter Education Program	20
Department of Libraries	0
VHFA	1
Vermont Bond Bank	4
Department of State's Attorneys & Sheriffs	0
Natural Resources Board	15
VEDA	12
VT 250 th Commission	8
Other	62
Grand Total	138

In addition to online training development, the Commission participated in three ethics trainings for government employees, including VTLEAD classes with the Center for Achievement in Public Service (CAPS) and a training for the Opioid Settlement Advisory Committee.

RECOMMENDATIONS

Pursuant to statute, the Commission is required to provide the legislature with any recommendations related to government ethics and campaign finance laws. The following summarizes the recommendations of the Commission for this legislative session:

1. Begin to consider a method for enforcement of the municipal code of ethics

In 2023, at the request of the legislature, the Ethics Commission researched and developed a proposed municipal ethics framework for Vermont. At the time, the Ethics Commission did not include enforcement options in the report, as it didn't think the issue was ripe for discussion. The Ethics Commission has now updated the report with options for the legislature to consider with respect to enforcement of the statewide Municipal Code of Ethics. The update can be found below.

2. Expansion of funding and staffing of the Commission

The Commission is currently staffed with one part-time Executive Director and one part-time administrative assistant. This is the same staffing level that existed prior to the passage of the State Code of Ethics in 2022. Since that time, the Ethics Commission has experienced continuously increasing demand for its services. Additionally, the passage of H.875, which expands the scope of services provided by the Commission to include municipalities, has further increased the Commission's workload. The Ethics Commission recommends that the Legislature provide increased funding for the Commission to support the addition of one full-time Legal Counsel and one full-time staff attorney.

3. Expansion of membership of the Commission

When fully functioning, the Ethics Commission will have 7 members. Each of the legislative bodies now has an appointment to the Commission. The judicial branch is represented by two appointees. However, the executive branch remains unrepresented. The Ethics Commission recommends that the legislature add an appointment for the Governor. This could be accomplished by increasing the number of members on the Commission, or by converting an existing appointment to an appointment for the Governor. If the legislature decides to add a commission member, we recommend adding a second appointment for a member of the executive branch, such as the Secretary of State, to ensure the Commission maintains an odd number of members for voting purposes.

4. Development of mediation options for ethics complaints

The Commission recognizes that a number of concerns brought to the Commission could best be resolved through alternative dispute resolution, particularly in the municipal context. The Ethics Commission sees the value in offering mediation services to assist in resolving complaints. Such mediation services should be conducted by an independent party or entity, with no interest in, or knowledge of, the underlying complaint. The Commission recommends that the legislature consider supporting the development of mediation services to be offered by or through the Ethics Commission.

5. Improvements and corrections to H.875

Following the last legislative session, the Ethics Commission has identified several areas where the language of H.875 could be clarified or otherwise improved. The Commission recommends addressing

these issues. For example:

- a. There is confusion over the definition of “municipality.” For example, the Ethics Commission has heard from officials in Water Districts and Fire Districts operating under the assumption that the statewide Municipal Code of Ethics applies to them. Whether the statewide Municipal Code of Ethics should cover School Districts is another matter that has yet to be discussed. The Commission recommends further discussion of how municipality is defined.
- b. Limiting the municipal officials who are required to take ethics training to a subset of those who are subject to the statewide Municipal Code has led to confusion regarding who is required to take the training. For clarity, and for the benefit of those subject to the municipal code of ethics, the Commission recommends expanding the training requirement to all cover municipal officials subject to the Municipal Code of Ethics.
- c. Expand the applicability of the statewide Municipal Code of Ethics to include all municipal officials. When compared to other states, Vermont is an outlier in the application of a statewide municipal code to a subset of municipal officials only.
- d. Executive Officer Financial Disclosures. Executive Officer Financial Disclosures. Clarify that the effective date for both Sec. 5, amending 3 V.S.A. § 1211(a), and Secs. 7, amending 3 V.S.A. § 1221(a), is January 1, 2026.
- e. Financial Disclosures. 3 V.S.A 1211(a)(6)(A)-(E) provides for the disclosure of individual stock holdings and interests in trusts, bespoke investment accounts, virtual currencies, and State and municipal bonds valued at \$25,000 or more. The Ethics Commission initially recommended a disclosure threshold of \$10,000 or more. We recommend that the current \$25,000 threshold be lowered to bring Vermont in line with national standards, where disclosure requirements are commonly set between \$1,000-\$10,000.
- f. The Ethics Commission strongly recommends establishing statutory protections from retaliation for municipal officials and members of the public who file written municipal ethics complaints.

6. Improvements to lobbyist disclosures

Lobbyist activity continues to increase in the state and has an increasing impact on legislation. The State Ethics Commission urges the legislature to consider changes to lobbyist disclosures in Vermont. In national surveys, Vermont’s on-line system has received high marks for its ease of access by the public. However, the strength of required lobbyist disclosures in Vermont as low when compared with New England states. Vermont requires fewer substantive disclosures from both individual lobbyists, and lobbyist employers and firms.¹ In addition, Vermont law does not require any audits of lobbyist disclosures. Thus, there is minimal scrutiny of the information that is submitted by lobbyists.

¹ According to the non-profit “F Minus”, which tracks lobbyist disclosures pertaining to climate change: “Vermont makes it hard to know. Lobbyists report their compensation but don’t have to report positions or bill numbers. Expenses are reported in considerable detail, including line items for Advertising and Telemarketing, but this information would be a lot more useful if it could be conclusively linked to legislation.”

7. Improvements to candidate disclosures related to lobbying

In the previous session, the legislature updated several of the disclosure requirements for candidates. The Commission encourages the legislature to add an additional requirement these disclosure provisions. At present, candidates for office are required to disclose whether their spouses or domestic partners are lobbyists and, if so, they are required to disclose lobbying firm as well (if applicable). 17 V.S.A. § 2414 (a)(7). The Commission believes that the voting public would also benefit from the disclosure of the issues that the lobbyist spouse/domestic partner is lobbying.

Update to the 2024 Municipal Ethics Report

ENFORCEMENT OF THE MUNICIPAL CODE OF ETHICS

INTRODUCTION

In 2024, after directing the Ethics Commission to prepare a proposal for a municipal ethics framework for Vermont, the legislature passed a statewide Municipal Code of Ethics. The Code mirrors the State Code of Ethics in that it sets a floor for ethical standards in municipal government but allows municipalities to adopt ethics policies that supplement the State Code of Ethics or set higher ethical standards.

In preparing municipal ethics framework, the Ethics Commission did not make recommendations for an enforcement protocol. The Commission now offers three potential enforcement options with respect to municipal ethics:

(1) a localized format, wherein all enforcement takes place at the local level, under municipal control and subject to rules and procedures developed by each municipality;

(2) a regional format, wherein regional boards are established to investigate municipal ethics complaints; and,

(3) a statewide format, where the State Ethics Commission adjudicates municipal ethics complaints.

Each of these options, which are meant to serve as a starting point for further discussions, has distinct pros and cons.

THREE POTENTIAL ENFORCEMENT STRUCTURES

1. Municipalities Enforce Ethics Rules

Under this option, each municipality would continue to oversee compliance with and the enforcement of ethics rules according to their own individualized complaint investigation policies and procedures.

This rubric would present several advantages:

- Where municipalities have adopted supplemental, municipal-specific ethics policies, local decision-makers will have more expertise and experience applying those policies to municipal complaints.
- Decisions would be made by individuals familiar with local issues and dynamics.
- Documents and witnesses are more likely to be maintained and available at the local level.

However, there are downsides to this approach:

- A frequent concern raised by members of the public and municipal officials seeking assistance from the Ethics Commission (one also voiced frequently by citizens during the Commission's listening sessions leading up to passage of H.875), is about impartiality in addressing ethics complaints at the local level.
- There is a high likelihood that interpretations of the statewide Municipal Code of Ethics would be inconsistent throughout the state. In addition, it is possible that interpretations may vary even within a municipality, depending on the adjudicating ethics body.
- In smaller communities, there is a substantial risk that conflicts of interest may create difficulty in adjudicating matters (either because of excess recusals or because of the close-knit nature of smaller towns and villages).
- Meaningful data would be difficult to collect and interpret because of the diffuse nature of this option. As such, the legislature may have future difficulties in gaining information that would inform of necessary changes and amendments to the law.

2. Regional Ethics Boards Are Created to Enforce Ethics Rules

Under this approach, the state would establish regional ethics boards to receive and investigate complaints. Each regional board would be made up of residents from municipalities within the region. The board would then be tasked with investigating and hearing complaints that are filed against municipal officials and employees within the region. In this model, regional boards would be responsible for accepting and investigating complaints; adjudicating those complaints (where appropriate); and enforcement (where appropriate); or some combination thereof.

There are several benefits to this approach:

- The approach would allow the public to have greater confidence that complaints are being handled in an impartial manner, while maintaining a level of local control.
- Because adjudication would come from a smaller number of entities when compared to the municipal enforcement model, there is greater likelihood of consistency in application.
- Reduces the burden on individual municipalities, because the municipality would no longer have to conduct its own investigations or hearings.

The potential challenges of this approach include:

- By establishing new regional boards, the approach would require the establishment of a new layer of bureaucracy for ethics matters. This potentially adds costs and inefficiencies.
- The added layer of the regional boards would likely extend the time in which matters get investigated and adjudicated.
- Although the regional boards would be made up of municipal representatives, some municipalities would not have a representative on the regional board.

3. The State Ethics Commission Enforces the Municipal Code of Ethics

Under this option, the Vermont State Ethics Commission would play the primary role in investigating and adjudicating municipal ethics complaints. The Commission would be able impose sanctions or recommend corrective actions. Respondents would have the right to appeal the adjudication to the Superior Court.

This approach has several benefits:

- Centralized enforcement of the Code would ensure consistency of application of the Code.
- Because the Commission has no perceived affiliation with any municipal government, this approach would likely give confidence of impartiality to complainants and respondents alike.
- Reduces burdens on individual municipalities, because the municipality would no longer have to conduct its own investigations or hearings.
- Because the Commission is solely dedicated to ethics issues, the Commission may be able to bring consistent expertise to municipal ethics matters with lower overall costs and higher efficiency than other options.
- The enforcement process would be simplified for municipalities.
- This enforcement method would allow for robust collection of data, which might then be more readily usable for the legislature in amending the law as necessary.

The negative aspects of this approach might include:

- The length of investigations and adjudications may extend longer than other options, because the Commission would need to gather information, and interview witnesses throughout the state for each case.
- The Commission is currently inadequately budgeted and staffed to manage a statewide municipal caseload and would require significant upscaling.
- Because each municipality may have municipal-specific ethics policies, a determination would have to be made regarding whether the Commission would have authority to handle complaints of this nature, and, if so, it may be at a disadvantage in interpreting and adjudicating these unique, localized prohibitions.

- In matters where corrective action is called for, the Commission would likely have higher monitoring costs than at the local level.

RECOMMENDATION

The Commission recommends a hybrid approach to enforcement of the Municipal Code of Ethics. Under this structure, municipalities would receive, investigate, and adjudicate complaints. Respondents would then have the right of appeal to the State Ethics Commission. The Commission would receive investigative reports and documentation, from the municipality. The Commission would then conduct an appeals hearing on the matter and decide whether the municipality's determination should be upheld, dismissed, or amended. The Respondent would have the right to appeal the Ethics Commission's decision to the Superior Court. This structure attempts to balance the interests and local expertise of the municipality with the consistency and expertise of the Commission.

CONCLUSION

The Ethics Commission believes its most productive role at this time is to continue to implement the ethics legislation that has been passed during the last three years, and to raise awareness about the Code of Ethics through training and the continued provision of ethics advice and guidance. In the end, government integrity is recognized only when the public is confident that its servants are doing the right thing. The Ethics Commission is committed to its role in that effort.

Respectfully submitted:



Vermont State Ethics Commission,
Christina Sivret
Executive Director

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State Ethics Commission

Program Name	Appropriation Dept ID	Program Purpose and Context	Program Services Provided	Program Website	Number of Measures Reported
Advisory Opinions	1300001000	Any State of Vermont public servant may request an Advisory Opinion regarding any issue related to governmental ethics and their own conduct. Advisory Opinions are available to the public on the Commission's website, after personally identifiable information has been redacted. Advisory Opinions are based upon an analysis of State ethics laws and policies, and are intended to provide meaningful advice to the requestor and anyone engaged in similar activities	A request for an Advisory Opinion will be acknowledged within 5 business days of receipt of the request. The Executive Director will then review the request and notify the requester whether it has been accepted, denied, or if more information is needed to make a decision. If the request is accepted, the Commission will endeavor to finalize the Advisory Opinion request by the 30 th day after the Commission has received all relevant facts and other necessary materials and are posted to the Commission's website within 30 days of issuance.	https://ethicscommission.vermont.gov/advisory-opinions	1
Complaints	1300001000	The goal of the complaint process is to provide an avenue of accountability to anyone who believes they have experienced or witnessed unethical conduct in State Government, which aids the Commission's mission to promote ethics in government. Receiving, reviewing, and referring complaints regarding ethical conduct is a core function of the Ethics Commission. By statute, anyone can file a complaint with the Ethics Commission regarding ethical conduct in any of the three branches of State government or the State's campaign finance law.	When a complaint is received, the Executive Director performs a preliminary review of each complaint to determine whether the complaint can be referred for further action. When a complaint is referred for further action, the receiving entity uses its own policies and procedures to investigate and to decide what, if any, action to take.	https://ethicscommission.vermont.gov/file-complaint	4
Guidance Requests	1300001000	State of Vermont public servants may request confidential guidance regarding any issue related to governmental ethics. By statute, requests for guidance must relate to the requester's own conduct. The goal of this service is to offer public servants an avenue to discuss questions related to ethics and aid them in decision-making. This service furthers the Commission's mission to promote ethics in government and educate public servants on ethical behavior in the context of the State Code of Ethics.	State of Vermont public servants may request ethics Guidance from the Executive Director on demand. Guidance can either be verbal or in writing. Guidance is non-binding and confidential unless the recipient chooses to disclose it.	https://ethicscommission.vermont.gov/advisory-opinions	1
Trainings	1300001000	State agencies or entities may request training for their employees or other public servants on the State Code of Ethics or any issue related to governmental ethics. Online training on the State Code of Ethics is also available on the Ethics Commission website and via CAPS. This service furthers the Commission's mission to promote ethics in government and educate public servants on ethical behavior in the context of the State Code of Ethics.	The Ethics Commission provides in-person and online training to State of Vermont employees, with a current emphasis on developing training materials and online training re the State Code of Ethics to be available to all public servants on demand.	https://ethicscommission.vermont.gov/training	1

State Ethics Commission

Program Name	Measure	Measure Type	Unit Type	Polarity	Reporting Period	2018	2019	2020	2021	2022	2023	2024	Target	Notes
Advisory Opinions	Number of Advisory Opinions	Quantity	Number	Higher is better	CY	1.00	0.00	0.00	0.00	1.00	4.00	1.00	4	These tend to be restricted to complex fact patterns, a higher number indicates increased awareness re the Commission's services. However, due to staffing constraints, a lower number is what the Ethics Commission can handle at this point. With increased staffing we will do more engagement activities that we believe will increase demand for these types of services.
Complaints	Number of Complaint Inquiries	Quantity	Number	Higher is better	CY	-	-	-	-	7.00	23.00	37.00	x	There is no specific target for complaints - at this stage in ethics law developmnt a higher number of complaints generally means more awareness of ethics laws, however we would not have a target number seeking an increase in complaints (while a lower number would likely mean awareness is falling)
Complaints	Total Number of Complaints (formal complaints received)	Quantity	Number	Higher is better	CY	19.00	20.00	18.00	12.00	2.00	11.00	16.00	x	There is no specific target for complaints - at this stage in ethics law developmnt a higher number of complaints generally means more awareness of ethics laws, however we would not have a target number seeking an increase in complaints (while a lower number would likely mean awareness is falling)
Complaints	Number Complaint Referrals	Quantity	Number	Higher is better	CY	11.00	7.00	4.00	1.00	1.00	8.00	8.00	x	There is no specific target for complaints - at this stage in ethics law developmnt a higher number of complaints generally means more awareness of ethics laws, however we would not have a target number seeking an increase in complaints (while a lower number would likely mean awareness is falling)

State Ethics Commission

Program Name	Measure	Measure Type	Unit Type	Polarity	Reporting Period	2018	2019	2020	2021	2022	2023	2024	Target	Notes
Complaints	Number of Closed Complaints (not referred)	Quantity	Number	Higher is better	CY	8.00	4.00	2.00	3.00	1.00	2.00	5.00	x	There is no specific target for complaints - at this stage in ethics law development a higher number of complaints generally means more awareness of ethics laws, however we would not have a target number seeking an increase in complaints (while a lower number would likely mean awareness is falling)
Guidance Requests	Number of Guidance Requests	Quantity	Number	Higher is better	CY	62.00	0.00	1.00	6.00	9.00	18.00	20.00	40	Now that there is a statewide municipal code of ethics, we anticipate guidance requests to double as 50% of our calls currently relate to municipal ethics.
Trainings	Number of Trainings (excludes online training numbers)	Quantity	Number	Higher is better	CY	1.00	4.00	5.00	5.00	3.00	4.00	3.00	4	4 is the number of in-person trainings we can do per year with our current staffing. We plan to increase online training capacity through the development of an online municipal ethics training.

Fiscal Year 2026 Budget Development Form: Ethics Commission

	General \$\$	Int. Service \$\$	Interdept'l Transfer \$\$	All other \$\$	Total \$\$
Approp #1 [1300001000]: Ethics Commission FY 2025 Approp	0	210,353	0	0	210,353
Other Changes: (Please insert changes to your base appropriation that occurred after the passage of the FY 2025 budget)					0
FY 2025 Other Changes	0	0	0	0	0
Total Approp. After FY 2025 Other Changes	0	210,353	0	0	210,353
CURRENT SERVICE LEVEL/CURRENT LAW	0	13,209	0	0	13,209
<i>Personal Services</i>	<i>0</i>	<i>12,413</i>	<i>0</i>	<i>0</i>	<i>12,413</i>
500000: Salary & Wages: Classified Employees		4,400			4,400
500010: Salary & Wages: Exempt Employees					
501500: Health Insurance: Classified Employees		5,059			5,059
501510: Health Insurances: Exempt Employees					
502000: Retirement: Classified Employees		2,777			2,777
502010: Retirement: Exempt Employees					
All Other Employee Payroll Related Fringe Benefits		315			315
504040: VT Family & Medical Leave Insurance Premium		16			16
504045: Child Care Contribution		107			107
505200: Workers' Compensation Insurance Premium		39			39
508000: Vacancy Turnover Savings					0
Contracted and 3rd Party Service		1,500			1,500
Per Diems and Other Personal Services		(1,800)			(1,800)
<i>Operating Expenses</i>	<i>0</i>	<i>796</i>	<i>0</i>	<i>0</i>	<i>796</i>
515010: Fee-for-Space Charge		(558)			(558)
516000: Insurance Other Than Employee Benefits		(1)			(1)
516010: Insurance - General Liability		50			50
516671: VISION/ISD		(793)			(793)
516685: ADA Allocated Charge		231			231
519006: Human Resources Services		48			48
523620: Single Audit Allocation		5			5
519005-Agency Fee		970			
516660-ADS Service Level Agreement		2,751		0	2,751
Other Operating increases		(1,907)			(1,907)
					0
					0
<i>Grants</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
					0
					0
Subtotal of Increases/Decreases	0	13,209	0	0	13,209
FY 2026 Governor Recommend	0	223,562	0	0	223,562
Ethics Commission FY 2025 Appropriation	0	210,353	0	0	210,353
Reductions and Other Changes	0	0	0	0	0
FY 2025 Total After Other Changes	0	210,353	0	0	210,353
TOTAL INCREASES/DECREASES	0	13,209	0	0	13,209
Ethics Commission FY 2026 Governor Recommend	0	223,562	0	0	223,562

**State of Vermont
Budget Rollup Report**

Organization: 1300001000 - State Ethics Commission

Budget Object Group: 1. PERSONAL SERVICES

Budget Object Rollup Name	FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Salaries and Wages	81,233	79,695	79,695	84,095	4,400	5.5%
Fringe Benefits	42,974	60,679	60,679	68,992	8,313	13.7%
Contracted and 3rd Party Service	26,573	25,000	25,000	26,500	1,500	6.0%
PerDiem and Other Personal Services	2,688	6,000	6,000	4,200	(1,800)	-30.0%
Budget Object Group Total: 1. PERSONAL SERVICES	153,467	171,374	171,374	183,787	12,413	7.2%

Budget Object Group: 2. OPERATING

Budget Object Rollup Name	FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Equipment	0	0	0	0	0	0.0%
IT/Telecom Services and Equipment	11,814	10,404	10,404	12,588	2,184	21.0%
Other Operating Expenses	10	5	5	10	5	100.0%
Other Purchased Services	13,504	12,850	12,850	11,767	(1,083)	-8.4%
Property and Maintenance	266	0	0	0	0	0.0%
Property Rental	7,055	8,195	8,195	7,637	(558)	-6.8%
Supplies	1,859	500	500	2,240	1,740	348.0%
Travel	1,107	7,025	7,025	5,533	(1,492)	-21.2%
Budget Object Group Total: 2. OPERATING	35,614	38,979	38,979	39,775	796	2.0%

Total Expenditures	189,081	210,353	210,353	223,562	13,209	6.3%
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Fund Name	FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
ISF Funds	189,081	210,353	210,353	223,562	13,209	6.3%
IDT Funds	0	0	0	0	0	0.0%
Funds Total	189,081	210,353	210,353	223,562	13,209	6.3%

Position Count	2
FTE Total	1.5

**State of Vermont
Budget Detail Report**

Organization: 1300001000 - State Ethics Commission

Budget Object Group: 1. PERSONAL SERVICES

Salaries and Wages		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
Classified Employees	500000	81,233	0	0	0	0	0.0%
Exempt	500010	0	79,695	79,695	84,095	4,400	5.5%
Overtime	500060	0	0	0	0	0	0.0%
Total: Salaries and Wages		81,233	79,695	79,695	84,095	4,400	5.5%

Fringe Benefits		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
FICA - Classified Employees	501000	5,757	0	0	0	0	0.0%
FICA - Exempt	501010	0	6,096	6,096	6,434	338	5.5%
Health Ins - Classified Empl	501500	19,021	0	0	0	0	0.0%
Health Ins - Exempt	501510	0	35,558	35,558	40,617	5,059	14.2%
Retirement - Classified Empl	502000	16,314	0	0	0	0	0.0%
Retirement - Exempt	502010	0	15,983	15,983	18,760	2,777	17.4%
Dental - Classified Employees	502500	766	0	0	0	0	0.0%
Dental - Exempt	502510	0	1,706	1,706	1,706	0	0.0%
Life Ins - Classified Empl	503000	798	0	0	0	0	0.0%
Life Ins - Exempt	503010	0	399	399	362	(37)	-9.3%
LTD - Classified Employees	503500	86	0	0	0	0	0.0%
LTD - Exempt	503510	0	134	134	142	8	6.0%
EAP - Classified Empl	504000	70	0	0	0	0	0.0%
EAP - Exempt	504010	0	68	68	74	6	8.8%
FMLI	504040	0	296	296	312	16	5.4%
Child Care Contribution Exp	504045	0	263	263	370	107	40.7%
Workers Comp - Ins Premium	505200	162	176	176	215	39	22.2%
Total: Fringe Benefits		42,974	60,679	60,679	68,992	8,313	13.7%

**State of Vermont
Budget Detail Report**

Organization: 130001000 - State Ethics Commission

Contracted and 3rd Party Service		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
Contr & 3Rd Party - Legal	507200	0	0	0	0	0	0.0%
Contr&3Rd Pty - Info Tech	507550	4,250	0	0	1,500	1,500	100.0%
Other Contr and 3Rd Pty Serv	507600	22,323	25,000	25,000	25,000	0	0.0%
Total: Contracted and 3rd Party Service		26,573	25,000	25,000	26,500	1,500	6.0%

PerDiem and Other Personal Services		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
Catamount Health Assessment	505700	250	0	0	0	0	0.0%
Per Diem	506000	2,438	6,000	6,000	4,200	(1,800)	-30.0%
Total: PerDiem and Other Personal Services		2,688	6,000	6,000	4,200	(1,800)	-30.0%
Total: 1. PERSONAL SERVICES		153,467	171,374	171,374	183,787	12,413	7.2%

Budget Object Group: 2. OPERATING

Equipment		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between Recommend and FY2025 As Passed	Percent Change Recommend and FY2025 As Passed
Description	Code						
Furniture & Fixtures	522700	0	0	0	0	0	0.0%
Total: Equipment		0	0	0	0	0	0.0%

**State of Vermont
Budget Detail Report**

Organization: 1300001000 - State Ethics Commission

IT/Telecom Services and Equipment		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
ADS VOIP Expense	516605	249	0	0	0	0	0.0%
Telecom-Telephone Services	516652	0	0	0	0	0	0.0%
Telecom-Wireless Phone Service	516659	1,119	975	975	970	(5)	-0.5%
ADS Enterp App Supp SOV Emp Exp	516660	5,695	3,675	3,675	6,426	2,751	74.9%
It Intsvccost-Vision/Isdassess	516671	2,031	2,193	2,193	1,400	(793)	-36.2%
ADS Allocation Exp.	516685	2,421	2,561	2,561	2,792	231	9.0%
Hw - Computer Peripherals	522201	299	0	0	0	0	0.0%
Hardware - Desktop & Laptop Pc	522216	0	1,000	1,000	1,000	0	0.0%
Hw - Printers,Copiers,Scanners	522217	0	0	0	0	0	0.0%
Hw-Video Conferencing	522260	0	0	0	0	0	0.0%
Total: IT/Telecom Services and Equipment		11,814	10,404	10,404	12,588	2,184	21.0%

Other Operating Expenses		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
Single Audit Allocation	523620	10	5	5	10	5	100.0%
Registration & Identification	523640	0	0	0	0	0	0.0%
Total: Other Operating Expenses		10	5	5	10	5	100.0%

**State of Vermont
Budget Detail Report**

Organization: 1300001000 - State Ethics Commission

Other Purchased Services		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
Insurance Other Than Empl Bene	516000	15	36	36	35	(1)	-2.8%
Insurance - General Liability	516010	185	225	225	275	50	22.2%
Dues	516500	0	445	445	445	0	0.0%
Licenses	516550	0	0	0	0	0	0.0%
Advertising-Print	516813	2,980	500	500	0	(500)	-100.0%
Advertising-Web	516814	1,675	0	0	0	0	0.0%
Registration For Meetings&Conf	517100	445	0	0	0	0	0.0%
Postage - Bgs Postal Svcs Only	517205	0	0	0	0	0	0.0%
Outside Conf, Meetings, Etc	517500	(700)	3,600	3,600	1,950	(1,650)	-45.8%
Agency Fee	519005	7,308	6,298	6,298	7,268	970	15.4%
Human Resources Services	519006	1,596	1,746	1,746	1,794	48	2.7%
Total: Other Purchased Services		13,504	12,850	12,850	11,767	(1,083)	-8.4%

Property and Maintenance		FY2024 Actuals			FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and As Passed	Percent Change FY2026 Governor's Recommend and As Passed
Description	Code						
Repair & Maint - Buildings	512000	266	0	0	0	0	0.0%
Total: Property and Maintenance		266	0	0	0	0	0.0%

**State of Vermont
Budget Detail Report**

Organization: 1300001000 - State Ethics Commission

Property Rental		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
Fee-For-Space Charge	515010	7,055	8,195	8,195	7,637	(558)	-6.8%
Total: Property Rental		7,055	8,195	8,195	7,637	(558)	-6.8%

Supplies		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
Office Supplies	520000	0	500	500	500	0	0.0%
Recognition/Awards	520600	119	0	0	0	0	0.0%
Subscriptions	521510	1,740	0	0	1,740	1,740	100.0%
Total: Supplies		1,859	500	500	2,240	1,740	348.0%

**State of Vermont
Budget Detail Report**

Organization: 1300001000 - State Ethics Commission

Travel		FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Description	Code						
Travel In-State Non-Employee	518299	0	500	500	0	(500)	-100.0%
Travel-Inst-Auto Mileage-Nonemp	518300	0	0	0	0	0	0.0%
Travel-Inst-Other Trans-Nonemp	518310	60	0	0	0	0	0.0%
Travel-Outst-Other Trans-Emp	518510	0	2,000	2,000	1,742	(258)	-12.9%
Travel-Outst-Meals-Emp	518520	0	900	900	900	0	0.0%
Travel-Outst-Lodging-Emp	518530	0	3,000	3,000	2,391	(609)	-20.3%
Travel-Outst-Incidentals-Emp	518540	0	625	625	500	(125)	-20.0%
Trvl-Outst-Other Trans-Nonemp	518710	506	0	0	0	0	0.0%
Travel-Outst-Lodging-Nonemp	518730	531	0	0	0	0	0.0%
Trvl-Outst-Incidentals-Nonemp	518740	10	0	0	0	0	0.0%
Total: Travel		1,107	7,025	7,025	5,533	(1,492)	-21.2%
Total: 2. OPERATING		35,614	38,979	38,979	39,775	796	2.0%
Total Expenditures		189,081	210,353	210,353	223,562	13,209	6.3%

Fund Name	Fund Code	FY2024 Actuals	FY2025 Original As Passed Budget	FY2025 Governor's BAA Recommended Budget	FY2026 Governor's Recommended Budget	Difference Between FY2026 Governor's Recommend and FY2025 As Passed	Percent Change FY2026 Governor's Recommend and FY2025 As Passed
Inter-Unit Transfers Fund	21500	0	0	0	0	0	0.0%
Human Resource Services	59600	189,081	210,353	210,353	223,562	13,209	6.3%
Funds Total		189,081	210,353	210,353	223,562	13,209	6.3%

Position Count	2
FTE Total	1.50

Report ID: VTPB-14-POSITION_SUMMARY
 Run Date: 01/25/2025
 Run Time: 02:51 PM

State of Vermont
FY2026 Governor's Recommended Budget
Position Summary Report

1300001000-State Ethics Commission

Position Number	Classification	FTE	Count	Gross Salary	State Benefits	Federally Mandated	Total
967001	95010E - Executive Director	0.50	1	53,415	25,106	4,087	82,608
967002	05010E - Administrative Assistant	1.00	1	30,680	37,237	2,347	70,264
Total		1.50	2	84,095	62,343	6,434	152,872

Fund Code	Fund Name	FTE	Count	Gross Salary	State Benefits	Federally Mandated	Total
59600	Human Resource Services	1.50	2	84,095	62,343	6,434	152,872
Total		1.50	2	84,095	62,343	6,434	152,872

Note: Numbers may not sum to total due to rounding.

