

To: **San Francisco Civil Service Commission**

From: **Michael Christensen**

Date: **May 7, 2026**

Subject: **OpenGov Personal Service Contract Hearing, May 18, 2026**

Members of the Civil Service Commission:

I am writing to provide written testimony for the Civil Service Commission's May 18, 2026 hearing on the PermitSF OpenGov Personal Service Contract.

I served the City and County of San Francisco as a civil service employee for ten years, leading the implementation of complex development and technology projects for SF Planning, the Department of Building Inspection, and the Permit Center. In early 2025, I was asked to join the PermitSF OpenGov Core Team as Lead Subject Matter Expert, a position I held until December 2025. My departure from City service was a direct result of my concerns about the project, having been asked by department leadership to report colleagues who might "cause problems for the project," and having experienced direct retaliation after I filed two formal whistleblower complaints with the SF City Controller's Office.

The following reflects my personal observations and recollections from my time as Lead Subject Matter Expert on the PermitSF OpenGov Core Team. These are my personal views alone.

1. OpenGov Was Deliberately Selected to Replace Civil Service Roles

When the selection of OpenGov was announced, I was called into a direct conversation with PermitSF leadership and told explicitly that OpenGov was chosen specifically because its ongoing service and support model differs materially from the alternative product, Clariti, and from other platforms currently in use by the City such as Accela and Salesforce.

Those other platforms follow a standard implementation model: the software vendor and implementation partners design and configure the system based on requirements

developed by City staff, then train City staff in its use and ongoing administration. Ongoing maintenance and support is then transferred to City employees, with the vendor consulted for unique cases or major changes to configuration. OpenGov's model is structurally different. OpenGov conducts all ongoing service, support, configuration, and system changes directly, on a permanent basis. City staff are not trained to perform these functions, by design.

This is not a consequence of the software being proprietary. Accela, Salesforce, and Clariti are all proprietary systems, yet all are designed to be administered by City staff after implementation. OpenGov is specifically designed in a manner that will preclude City staff from performing roles they have held for years. I was told directly that displacing these existing civil service functions was a deliberate reason for the selection. I reported this in my first whistleblower complaint to the Controller's Office.

The Planning Department, now merged with Building Inspection and the Permit Center, has more than 50 civil service employees in technology roles whose responsibilities include exactly the kind of system administration, configuration, and support work that OpenGov is being paid to perform. Under the Commission's PSC Policy, the existence of a civil service class capable of performing the work means contracting out requires a compelling justification. The record here does not support that finding.

2. OpenGov Personnel Were Used to Perform Civil Service Work Beyond System Configuration and Support

My second whistleblower complaint to the Controller's Office concerned the use of OpenGov staff, through the contract, to research and author a white paper on San Francisco's permitting process and to recommend operational and policy changes. This is not software support. It is substantive analytical and advisory work of the kind routinely performed by civil service staff (including Principal Planners and Business Analysts) within the merged department. Using contract personnel to perform this work is both a misuse of contract funds and a further displacement of civil service responsibilities that should have been subject to Commission review.

3. The Vendor Selection Process Raises Serious Concerns

During the vendor selection process, Florence Simon, then head of the Mayor's Office of Innovation, directly asked prospective vendors whether they could build backdoors into

the system to allow city leadership to override agency permitting determinations, bypassing staff judgment when leadership disagreed with a decision or believed it was taking too long. OpenGov agreed to this feature without qualification. Other vendors declined, stating they would only implement functionality consistent with the legal requirements governing permit processing.

This exchange is directly relevant to the Commission's review. A system designed to allow political override of civil service determinations is not merely a technology procurement; it is a structural threat to the independence of the civil service functions this Commission is charged with protecting.

4. Concerns About the Procurement Process and Retaliation

Staff who raised concerns about this project faced a climate in which criticism was not welcomed by department leadership. Employees in union-represented civil service roles expressed fear of retaliation for speaking up — concerns communicated formally through Local 21. I was personally asked to identify and report colleagues who might raise objections. When I instead filed whistleblower complaints, I experienced retaliation directly. These matters are documented in my complaints to the Controller's Office and in a formal HR complaint.

I raise this not to relitigate those matters before this body, but because the suppression of internal dissent is directly relevant to how a contract of this nature advanced without adequate scrutiny.

5. Department Leadership Has Actively Worked to Expand OpenGov's Footprint at the Expense of Other Departments

I can personally attest that department leadership has directly lobbied other City departments to abandon technology implementations already in progress; specifically, an Accela implementation by the San Francisco Public Utilities Commission and a Clariti implementation by San Francisco Public Works, in favor of OpenGov. OpenGov has not delivered on or even commenced those projects. Steering other departments away from functioning implementations toward a vendor that has not demonstrated the capacity to serve their needs is not consistent with sound stewardship of City resources.

6. There Is No Emergency Justifying Expedited Approval

At the May 4 hearing, department leadership conveyed a sense of urgency based on the contract's impending expiration at the end of September and the need for Board of Supervisors approval. Commissioners appropriately questioned why the contract was submitted so late. I want to be direct: this is not an emergency. The expiration date has been known for the life of the contract. The appearance of urgency is a predictable consequence of delayed submission, not a genuine operational crisis that warrants bypassing normal oversight.

Moreover, the scope of services currently processed through OpenGov does not support any claim of emergency. The system handles only minor permits involving no meaningful plan review — such as replacing a window without altering its size, location, or operation. These use cases had existing, functional application pathways before OpenGov, both in-person and online. There is no basis for the claim that OpenGov is the only available solution for this work, and the Commission should not allow an artificially compressed timeline to substitute for the deliberate review this contract has always warranted.

7. Civil Service Expertise Was Deliberately Excluded from the Design Process, Producing Legal Deficiencies

During the system configuration and design phase, department leadership specifically excluded the civil service staff responsible for administering the City's existing permitting systems from all design discussions. The process was driven entirely by the PermitSF Chief of Staff, without meaningful input from the experienced staff whose institutional knowledge these systems depend upon.

The consequences of this exclusion are not merely operational — they are legal. San Francisco Administrative Code Section 31.08(d) requires that when the Environmental Review Officer delegates exemption determinations to other departments, those departments must inform the ERO of each determination and provide a copy containing the information specified in Section 31.08(e)(1). The ERO is then required under Section 31.08(e)(1)(A) to post that information publicly on the Planning Department website, including a project description, the type or class of exemption, supporting information, the applicable Approval Action, and the date of determination. This is not a technically complex requirement — the City's existing Accela implementation already supports this functionality. The OpenGov system as configured automatically issues categorical exemptions from CEQA without triggering either of these requirements — no

notification to the ERO, and no public posting on the Planning Department website. The system also fails to screen for circumstances where a categorical exemption is legally precluded, such as projects located on sites listed on the Cortese List under Government Code Section 65962.5, where more rigorous environmental review is required by state law. These are not minor technical oversights. They are failures to comply with binding procedural requirements that exist to protect the public's right to notice and to ensure the integrity of environmental review — requirements that experienced civil service staff would have identified and addressed in any properly conducted design process.

The Commission may wish to request meeting attendance logs from the design phase to independently verify that existing permitting system staff were excluded from these discussions. That documentation should be readily available.

8. The Contract Is Not Delivering on Its Stated Purpose

For the limited permit types the system has so far been capable of processing, customers previously submitted a single-page application and could often obtain permits the same day. Under the current system, the same permit requires responses to at least 70 distinct questions and asynchronous staff communication that routinely extends the process to days or weeks. This is not a growing pain. It reflects a fundamental mismatch between the product and the City's operational needs — one that was foreseeable, and that was raised internally before being suppressed.

I respectfully urge the Commission to deny approval of this contract as structured, and to require that the work currently being performed by OpenGov personnel be evaluated for reassignment to the civil service staff who are qualified, available, and whose roles this contract was designed to eliminate.

Thank you for your continued commitment to San Francisco's civil service merit system.

Respectfully submitted,

Michael Christensen

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(Writing in individual capacity)