



FY 2011 PERFORMANCE PLAN Office of Campaign Finance

MISSION

The mission of the Office of Campaign Finance (OCF) is to regulate the conduct of public officials, lobbyists, and political campaigns to ensure public trust in the integrity of the election process and government service.

SUMMARY OF SERVICES

The Office of Campaign Finance processes and maintains financial reports for public inspection, which are required by law to be filed with OCF; audits and develops statistical reports and summaries of the financial reports; conducts investigations and informal hearings of alleged violations of the Campaign Finance and Conflict of Interest Act (the Act); and renders interpretative opinions concerning the application of the Act.

AGENCY WORKLOAD MEASURES

Measure	FY2008 Actual	FY2009 Actual	FY2010 YTD
# of financial reports received	3,856	3,941	2484
Total number of desk reviews conducted of financial reports and financial disclosure statements	1,050	625	355
Total number of informal hearings conducted for noncompliance with the reporting requirements	293	210	26

OBJECTIVE 1: Obtain full and complete disclosure of documents and actions relevant to the Campaign Finance and Conflict of Interest Act through efficient and effective educational, audit, and enforcement processes.

INITIATIVE 1.1: Expand the OCF educational program to obtain full disclosure and increase voluntary compliance.

OCF will shift the focus of its online tutorials for candidates, political committees, lobbyists, public officials, citizen-service and statehood fund programs, and any interested member of the public, from the mechanics of the electronic filing of OCF Forms to web based training modules which will address the reporting requirements of each OCF Program. The training modules will be designed to create a better understanding of the campaign finance, lobbying, and conflict of interest and disclosure laws. The online training modules will also promote the timely electronic filing and certification of the financial reports. It is projected that a wider audience will be captured through the online training than can be reached through training conducted at the OCF Offices and off site. The training modules will be made available at the OCF Website January 2011.

INITIATIVE 1.2: Review Financial Reports and Disclosure Statements, conduct periodic random audits to ensure accurate reporting, and produce the Biennial Report.

OCF will desk review at the close of each filing deadline the Financial Reports and Disclosure Statements of political committees, candidates, lobbyists, public officials, citizen



service and statehood fund programs, for compliance with the reporting requirements; conduct random periodic audits of financial reports at the end of selected reporting cycles; and refer violations of the Campaign Finance Act to the General Counsel for enforcement. The desk review of financial reports and the conduct of periodic random audits are ongoing. Desk Reviews occur following each statutory filing deadline throughout the fiscal year; and periodic random audits occur at the end of selected reporting cycles. OCF will produce on January 31, 2011, the Biennial Report summarizing the receipts and expenditures of candidates for public office and political committees for the prior two year period.

INITIATIVE 1.3: Improve the Enforcement Process.

During FY11, the Office of the General Counsel will conduct a comparative study in September 2011 of the investigations initiated in FY11 to evaluate the timeframes within which it gathers and explores evidence during the course of full investigations. Based on the findings of the study, the investigative procedures, where warranted, will be modified to ensure the completion of investigations and the issuance of the Order of the Director within ninety (90) days of initiation to meet the statutory timeframe.

OBJECTIVE 2: Assimilate, maintain, and compile financial disclosure records received through electronic filing and by hard copy into an integrated, relational database.

INITIATIVE 2.1: Increase the Percentage of Financial Reports Filed Electronically.

OCF will aggressively advocate through educational outreach the use of the electronic filing system to file financial reports online at the OCF Web Site, and the certification of the reports by electronic signature, introduced in FY10, to eliminate the requirement for the submission of a signed paper copy of the electronically filed document in all OCF Programs. All OCF reporting entities have the option of filing their financial reports online, with the exception of filers of the ANC Summary Financial Statement and the Honoraria and Outside Income Disclosure Statement (HOIDS). The ANC form will be available for electronic filing in January 2011, and the HOIDS form in May 2011. The electronic signature functionality was fully implemented in FY10. This will reduce the number of paper reports and the need for manual data entry of information into the OCF Database. OCF will educate reporting entities on the availability of electronic filing through the issuance of reminder letters under the Filer Pre-Notification Program; the web based training modules; the OCF Brochures and Forms; the email subscription service; and the onsite training seminars.

INITIATIVE 2.2: Electronic Filing of the ANC Summary Financial Statement and the Honoraria and Outside Income Disclosure Statement.

OCF will introduce in FY11, the upgrade of the OCF Electronic Filing System to accept the online filing of the Summary Financial Statement of Candidate for the Office of Member of an Advisory Neighborhood Commission (ANC) Form; and will automate the financial reporting of the Honoraria and Outside Income Disclosure Statement (HOIDS) Form by Public Officials. The electronic filing capability for these two filer groups will reduce the number of paper filings and eliminate the need for manual data entry. The ANC Summary Financial Statement Form will be available for electronic filing in January 2011, and must be filed by the candidate within thirty (30) days of the certification of the November 2010



election results by the Board of Elections and Ethics. The HOIDS Form will be available for electronic filing in May of 2011. The development of both forms for electronic filing will be completed in FY10.

INITIATIVE 2.3: Complete the Data Entry of all Financial Reports received by hard copy into the database before the next filing deadline.

During FY09, 1,517 (1257 in FY08) public officials and reporting entities filed their reports electronically, and 2480 (2,493 in FY08) submitted paper reports. Although it is anticipated the number of electronic filings will steadily increase, due to the availability of the electronic signature functionality, and the introduction of the capability for the electronic filing of the ANC and Honoraria Financial Reports, the submission of paper reports will continue to require data entry. There will be a minimum of fifteen (15) separate filing deadlines, associated with the September 14, 2010 Primary Election and the November 2, 2010 General Election for the offices of Mayor, Chairman, At-Large and Ward Member of the Council, U.S. Representative, At-Large and Ward Member of the State Board of Education, and Advisory Neighborhood Commission Member. It is projected the number of financial reports filed will exceed 4,000, similar to that of FY09, with at least 35% of these reports requiring data entry prior to the next filing deadline to present an accurate portrayal of campaign activity. Given the projected decline in the number of paper reports with the implementation of electronic filing, it is anticipated that OCF staff will become more efficient and accurate in entering financial information and other data entries.

OBJECTIVE 3: Disseminate Financial Disclosure Records and Statistical Reports.

INITIATIVE 3.1: Launch the E-Mail Subscription Service.

The e-mail subscription service will disseminate audit and other critical information in a more timely and efficient manner, with blasts of reminders of filing dates to specific reporting entities, notices of the issuance of orders, final audits, rulemaking, and interpretative opinions. This initiative was completed in June 2010, and will be officially launched in January 2011 to coincide with the new redesigned OCF Website.

INITIATIVE 3.2: Electronic Disclosure of the Registration Statements of Candidates, Political Committees, Citizen-Service and Statehood Fund Programs, and Lobbyists.

OCF will upgrade the OCF Electronic Filing and Disclosure System to disclose information regarding registration statements of candidates, political committees, citizen-service and statehood fund programs, and lobbyists. It is anticipated that this feature will be made available in January 2011. This feature will allow users to search, retrieve, and view registration statements at the OCF Website in a PDF format.

INITIATIVE 3.3: Electronic Search of Lobbying and Financial Disclosure Information.

OCF will upgrade its Electronic Filing and Disclosure System to expand the search functionality on the OCF website. This will enable the public to acquire information about the lobbyists registered with the Office of Campaign Finance and the public officials who file Financial Disclosure Statements. The data will include the names of lobbyists and compensating registrants, their receipts and expenditures, and lobbying activities; and the



financial relationships of public officials with businesses that do business with the District Government. It is anticipated that this feature will be made available in January 2011.

PROPOSED KEY PERFORMANCE INDICATORS

Measure	FY2009 Actual	FY2010 Target	FY2010 Actual	FY2011 Projection	FY2012 Projection	FY2013 Projection
% of listings in the D.C. Register published before the statutory deadlines of January 15, April 30, June 15, and August 15 of each year	100%	100%	100%	100%	100%	100%
% of informal hearings conducted and closed before the next filing deadline	100%	100%	100%	100%	100%	100%
% of investigative matters closed within ninety days of opening	75%	100%	0%	100%	100%	100%
% of financial reports reviewed, evaluated, and analyzed before the next filing deadline	100%	100%	100%	100%	100%	100%
% of financial reports filed electronically ¹	42%	60%	47%	70%	75%	80%
# of periodic random audits conducted of political committees following the January 31 st and July 31 st filing deadlines ²	6	6	7	6 ³	6	6
Percent of interpretive opinions issued within thirty (30) days	100%	100%	100%	100%	100%	100%
Compliance rate ⁴	98%	100%	9439%	100%	100%	100%

¹ As of 2008, based on the “Grading State Disclosure 2008” Report, dated September 17, 2008 by the Campaign Disclosure Project, a partnership of the Center for Governmental Studies, the California Voter Foundation, and UCLA Law School, 30 states have mandatory electronic filing programs for certain campaign reports, and 12 states had some form of voluntary program; and 8 states had no electronic filing. The District of Columbia was not included in this study. Participation rates among the voluntary states averaged at that time at 54% for statewide candidates and 43 percent for legislative candidates. The Report can be found at www.campaigndisclosure.org. OCF will attempt to determine what the current trends are in electronic filing from the Council on Governmental Ethics Laws.

² The total number of periodic audits conducted for all filer groups was as follows: FY2009, 8; FY2010, 14. OCF expects the total number of periodic audits conducted for all filer groups to be as follows: FY2011, 8; FY2012, 12; FY2013, 8.

³ OCF expects to perform 3 audits of political committees following the January 31st filing deadline and 3 audits of political committees after the July 31st deadline.

⁴ The total number of disclosure statements received compared to the number expected.



Measure	FY2009 Actual	FY2010 Target	FY2010 Actual	FY2011 Projection	FY2012 Projection	FY2013 Projection
Percent of financial disclosure and conflict of interest reports filed electronically	Not Available	Not Available	48%	60%	70%	75%
Percent of financial disclosure statements filed on time	Not Available	Not Available	95%	96%	96%	96%
Percent of periodic random audits of political committees following January 31 and July 31 filing deadlines completed before the next filing deadline	Not Available	Not Available	100%	100%	100%	100%