



FY 2012 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 Code (the Code); and renders interpretative opinions concerning the application of the Code.

AGENCY WORKLOAD MEASURES

Measure	FY2009 Actual	FY2010 Actual	FY2011 YTD
# of financial reports received	3941	3815	3686
Total number of desk reviews conducted of financial reports and financial disclosure statements	625	1832	2017
Total number of informal hearings conducted for noncompliance with the reporting requirements	210	324	243

OBJECTIVE 1: Obtain full and complete disclosure of documents and actions relevant to the Campaign Finance Code 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 review the Regulations, Brochures, Forms, Online Training Modules, and Web Site, in general, to revise the information covered in each source to conform with the requirements of the “Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Emergency Amendment Act of 2012”, effective January 29, 2012. OCF will also focus on the new reporting requirements of the Campaign Finance Code in its training sessions for the new committees established under the Code and for the citizen-service program.

INITIATIVE 1.2: Review Financial Reports, 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 of political committees, candidates, lobbyists, 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 Code 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.

INITIATIVE 1.3: Improve the Enforcement Process.

During FY12, the Office of the General Counsel will review the operating procedures, regulations and forms of the Office of Campaign Finance and propose comprehensive amendments, where appropriate, in order to conform with the changes in the campaign finance laws required by the new Campaign Finance Code.

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 by candidates and political committees participating in the 2012 election cycle, as well as by other filer groups, to file financial reports online at the OCF Web Site, and the certification of the reports by electronic signature, introduced in FY10. The electronic filing and certification of financial reports reduces the need for the manual data entry of information, and eliminates 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, including the filers of the ANC Summary Financial Statement. OCF will continue to advocate 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.

OCF introduced 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. The electronic filing capability for this filer group will reduce the number of paper filings and eliminate the need for manual data entry. The ANC Summary Financial Statement Form was made available for electronic filing in January 2011, and must be filed by ANC candidates within thirty (30) days of the certification of the election results for these offices by the Board of Elections. Because the automated form was made available in FY11 close to the filing deadline for ANC candidates, there was minimal opportunity to inform the public. Therefore, in FY 2012, the Office of Campaign Finance will intensify its efforts to educate candidates for the Office of ANC Member who will participate in the upcoming 2012 November General Election about the availability and use of the electronic filing system for the submission of their financial report through coordination with the Board in the dissemination of information during the nominating petition process, and with the Advisory Neighborhood Commission Office; and by inclusion of candidates for ANC Member in the onsite training seminars conducted by OCF.



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

During FY10, public officials and reporting entities filed 1774 financial reports electronically, and submitted 2041 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 automation of the ANC Financial Report for electronic filing, the submission of paper reports will continue to require data entry. In FY 2012, there will be a minimum of ten (10) separate filing deadlines, associated with the April 3, 2012 Primary Election for the Offices of Presidential Delegate and Alternate Presidential Delegate to the Conventions and Conferences of Political Parties to nominate candidates for President and Vice President of the United States, Delegate to the U.S. House of Representatives, At-Large and Ward Members of the Council, U.S. Senator (Shadow Representative) and Representative (Shadow Representative), National Committeepersons and Alternates, and Local Party Officials. It is projected the number of financial reports filed will exceed 4,000, similar to that of FY10, 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 the data entry of financial information.

OBJECTIVE 3: Disseminate Financial Disclosure Records and Statistical Reports.

INITIATIVE 3.1: Ensure the Timely Dissemination and Transparency of Financial Reports.

The Office of Campaign Finance will employ an online survey following the conduct of the November 6, 2012 General Election to elicit comments and evaluate the effectiveness and efficiency of the OCF Web Site to deliver relevant information and services during the April 3, 2012 Primary Election and the November 6, 2012 General Election. The survey will be published at the OCF Web Site for online submission, and as a secondary method, the survey will be directed through the OCF e-mail subscription service to reporting entities, including candidates and political committees, and citizen-service and statehood fund programs, and to members of the public. The survey will also aid in the assessment of services recently made available to the public in FY 2011, including the electronic signature functionality in the electronic filing of financial reports; the e-mail subscription service; the Geographical Information System; the automation of the ANC Summary Financial Report for electronic filing; the electronic disclosure and search of the registration information of candidates and political committees; and the database download functionality. The results of the survey will aid OCF in its ongoing effort to ensure the disclosure, transparency, and easy access by the public of the financial reports filed with the Agency.



PROPOSED KEY PERFORMANCE INDICATORS

Measure	FY2010 Actual	FY2011 Target	FY2011 YTD	FY2012 Projection	FY2013 Projection	FY2014 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	100%	100%	100%	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	59.64%	70%		75%	80%	95%
# of periodic random audits conducted of political committees following the January 31 st and July 31 st filing deadlines ²	7	6 ³		6	6	6
Percent of interpretive opinions issued within thirty (30) days	100%	100%	100%	100%	100%	100%
Compliance rate ⁴	94.39%	100%		100%	100%	100%
Percent of financial disclosure and conflict of interest reports filed electronically	59.64%	60%		70%	100%	100%
Percent of financial disclosure statements filed on time	95%	96%		96%	96%	96%

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	FY2010 Actual	FY2011 Target	FY2011 YTD	FY2012 Projection	FY2013 Projection	FY2014 Projection
Percent of periodic random audits of political committees following January 31 and July 31 filing deadlines completed before the next filing deadline	100%	100%	100%	100%	100%	100%

*Per FY 2012 Performance Policy and Measure Recommendations of the GOE FY 2012 Budget Report, at Page 55, the “Office of Campaign Finance should increase the number of financial reports that are filed electronically, particularly in the lobbyist and Financial Disclosure statements, with a goal of 100 percent electronic filing by Fiscal Year 2013”; and for FY 2012, measure the “number of periodic random audits of lobbyist communications reports”. It should be noted, however, that based upon the enactment of the “Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Emergency Amendment Act of 2012”, effective January 29, 2012, the Office of Campaign Finance will no longer be responsible for the public reporting of public officials, and as of October 1, 2012, will no longer administer the provisions of the “Emergency Ethics Act” pertaining to lobbyists.