



FY 2013 PERFORMANCE PLAN Office of Campaign Finance

MISSION

The mission of the Office of Campaign Finance (OCF) is to regulate and provide public disclosure of the conduct, activities, and financial operations of candidates, campaign finance committees, legal defense committees, and constituent service and statehood fund programs to ensure public trust in the integrity of the election process and government service.

SUMMARY OF SERVICES

The Office of Campaign Finance processes and facilitates the public disclosure of financial reports, which are required by law to be filed with the OCF; desk reviews and develops statistical reports and summaries of the financial reports; encourages voluntary compliance by providing information and guidance on the application of the District of Columbia Campaign Finance Act of 2011 (the Act), as amended, through educational seminars, interpretative opinions, and the OCF Web Site; and enforces the Act through the conduct of audits, investigations, and the informal hearing process.

PERFORMANCE PLAN DIVISIONS

- Public Information and Records Management
- Reports Analysis and Audit Division
- Office of the General Counsel
- Agency Management

AGENCY WORKLOAD MEASURES

Measure	FY 2010 Actual	FY 2011 Actual	FY 2012 YTD
Total number of financial reports received	3,815	3,686	775
Total number of desk reviews conducted of financial reports and financial disclosure statements	1,832	2,017	639
Total number of informal hearings conducted for noncompliance with the reporting requirements	324	243	102

OBJECTIVE 1: Obtain full and complete disclosure of documents and actions relevant to the Campaign Finance 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 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 Title III, the "Campaign Finance Act of 2011", of the "Board of Ethics



and Government Accountability Establishment and Comprehensive Ethics Reform Amendment Act of 2011", effective April 27, 2012. OCF will continue to focus on the reporting requirements of the Campaign Finance Act in its training sessions for the new committees established under the Act and for the constituent services program. OCF completed a comprehensive revision of its regulations which was submitted to the Board of Elections (the Board) on August 6, 2012 for review. Upon the anticipated adoption of the regulations by the Board in November 2012, OCF will proceed to modify its forms, brochures, training modules, and web site, consistent therewith. Completion Date: September, 2013.

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 statutory filing deadline the Financial Reports of candidates, campaign finance committees, legal defense committees, and constituent service and statehood fund programs, for compliance with the reporting requirements; conduct periodic random 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. OCF will increase the number of periodic random audits of political committees conducted following the January 31st and July 31st filing deadlines from six (6) to twelve (12) in FY 2013. OCF will also produce and distribute the Biennial Report of Contribution and Expenditure Data on January 31, 2013. Completion Date: September, 2013.

INITIATIVE 1.3: Improve the enforcement process.

During FY13, 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 Campaign Finance Act of 2011. The Office of the General Counsel coordinated and completed the comprehensive revision of the regulations which was submitted to the Board of Elections in August 2012. Upon the final adoption of the regulations by the Board, the Office of the General Counsel will coordinate the review and modification of the OCF forms and operating procedures by the OCF Divisions. Completion Date: September, 2013.

INITIATIVE 1.4: Reorganize the structure of the Office of the General Counsel and the Reports Analysis and Audit Division.

Due to the increase of funds for the personal services budget of the Office of Campaign Finance for FY13 for the purpose of hiring nine (9) additional staff positions, the structure of the Office of the General Counsel and the Reports Analysis and Audit Division will be reorganized to be more resourceful in the audit and investigative programs. The Office of the General Counsel will be organized into two (2) units, the Compliance Unit, and the Investigation Unit. The Reports Analysis and Audit Division will be organized into three units, the Reports Analysis Unit, the Research Unit, and the Audit Unit. Completion Date: September, 2013.



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 continue to 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. 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, with the exception of Transition, Inaugural, and Legal Defense Committees, newly established under the Campaign Finance Act of 2011. Electronic filing modules will be developed and introduced for these filer types during FY 2013. OCF will advocate the use of the electronic filing system 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. Completion Date: September, 2013.

INITIATIVE 2.2: Promote electronic filing of ANC Summary Financial Statements.

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 must be filed by ANC candidates within sixty (60) 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 January 2011 filing deadline for ANC candidates, there was minimal opportunity to inform the public. Before and following the certification of the November 6, 2012 Election Results, the Office of Campaign Finance will intensify its efforts to educate ANC candidates about the availability of electronic filing through the OCF onsite training seminars, online bulletins, and the issuance of reminder letters under the Filer Pre-Notification Program. Completion Date: September, 2013.

INITIATIVE 2.3: Complete the data entry of all financial reports received by hard copy into the database before the next filing deadline.

During FY11, public officials and reporting entities filed 2,596 financial reports electronically, and submitted 1,090 paper reports. Although it is anticipated the number of electronic filings will steadily increase due to the availability of the electronic signature functionality, the submission of paper reports will continue to require data entry. In FY2013, there will be a minimum of six (6) separate filing deadlines, associated with the November 6, 2012 General Election for the Offices of President and Vice President of the United States, Delegate to the U.S. House of Representatives, At-Large and Ward Members of the Council and the State Board of Education, U.S. Senator



(Shadow Representative) and Representative (Shadow Representative), Advisory Neighborhood Commission Member; and the November 6, 2012 Special Election for the Office of Chairman of the Council of the District of Columbia. It is projected the percentage of financial reports electronically filed in FY 2013 will be similar to, if not exceed, that of FY12, at 70% of the total actual filers. The remaining 30%, at a minimum, of the total reports filed, will require data entry. The data entry must be completed 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. Completion Date: September, 2013.

INITIATIVE 2.4: Electronic Filing of the Financial Reports of Transition, Inaugural, and Legal Defense Committees and the Registration Statements of Exploratory Committees.

In FY13, OCF upgrade the OCF Electronic Filing System to accept the online filing of the financial reports of the committees newly established under the Campaign Finance Act of 2011, the Transition, Inaugural, and Legal Defense Committees; and the online registration of Exploratory Committees. The electronic filing capability for these filer groups will reduce the number of paper filings, eliminate the need for manual data entry, and provide for real time public disclosure. Completion Date: September, 2013.

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 and Special Elections 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 and Special Elections. 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 constituent service and statehood fund programs, and to members of the public. The survey will 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, political committees, and the constituent service and statehood fund programs; 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. Completion Date: September, 2013.



KEY PERFORMANCE INDICATORS

Measure	FY 2011 Actual	FY 2012 Target	FY 2012 YTD	FY 2013 Projection	FY 2014 Projection	FY 2015 Projection
Percent of informal hearings conducted and closed before the next filing deadline.	86.79%	100%	100%	100%	100%	100%
Percent of investigative matters closed within ninety days of opening.	62.5%	100%	100%	100%	100%	100%
Percent of financial reports reviewed, evaluated, and analyzed before the next filing deadline.	100%	100%	100%	100%	100%	100%
Percent of financial reports filed electronically ¹	70.99%	75.00%	74.97%	80%	90%	95%
Percent of Interpretative Opinions issued within thirty (30) days	100%	100%	100%	100%	100%	100%
Percent of periodic random audits conducted of political committees following the January 31st and July 31st filing deadlines	100%	100%	100%	100%	100%	100%

¹ Based on a report entitled "Grading State Disclosure 2008" by the Campaign Disclosure Project, the participation rate among 12 states with voluntary electronic filing programs was 54%.