



FY 2015 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 website; and enforces the Act through the conduct of audits, investigations, and the informal hearing process.

PERFORMANCE PLAN DIVISIONS¹

- Oversight Support Services²
- Agency Management

AGENCY WORKLOAD MEASURES

Measure	FY 2012 Actual	FY 2013 Actual	FY 2014 YTD ³
Total number of financial reports received	1,125	1,002	565
Total number of desk reviews conducted of financial reports and financial disclosure statements	877	953	742
Total number of informal hearings conducted for noncompliance with the reporting requirements	126	113	84

¹ OCF is an independent agency. For the purposes of the FY15 Performance Plan, the OCF elected to organize the Plan at the agency level instead of by budget division due to the significant overlap across budget divisions.

² Oversight Support Services includes the following programs: (1) Public Information and Records Management; Reports Analysis and Audit Division; and (3) Office of the General Counsel.

³ Data is accurate as of July 22, 2014.

⁴ Oversight Support Services is inclusive of all activity managed by the Agency.



*Oversight Support Services*⁴

SUMMARY OF SERVICES

Oversight Support Services provides desk analysis reviews, investigations, hearings, field audits, statistical reports, recommendations, and summaries of all financial reports submitted by candidates, political committees, constituent service programs, public officials, lobbyists, and statehood funds that focus efforts on ensuring accurate reporting and full disclosure, pursuant to Campaign Finance Laws, so that the public is well informed and confident in the integrity of the electoral process and government services. The program also provides public information and educational seminars.

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.

The Office of Campaign Finance will revise the OCF educational brochures, online training modules, and website content to conform with changes in the Campaign Finance Act of 2011, as amended by the “Campaign Finance Reform and Transparency Act of 2013”, D.C. Law 20-0079 (February 22, 2014), which will apply January 31, 2015. The OCF will develop and introduce a Mandatory Training Program to be attended by each candidate for public office and the treasurer of each political committee, political action committee, or independent expenditure committee, following registration with the Office of Campaign Finance. The training will address the obligations and responsibilities of the new registrants under the Campaign Finance Act, and how best to achieve compliance. The OCF will schedule and conduct bi-weekly training sessions, commencing December 11, 2014, on the most recent amendments to the Campaign Finance Act for the continuing committees, the candidates and committee treasurers who may register to participate in the 2016 Election Cycle, and for the constituent service and statehood fund programs. **Completion Date: September 2015.**

INITIATIVE 1.2: Review financial reports, conduct periodic random audits to ensure accurate reporting, and produce the Biennial Report.

The Office of Campaign Finance will revise the Standard Operating Procedures of the Audit Division to increase the number of periodic audits conducted of the financial reports of active principal campaign committees during the election cycle from two (2) to four (4) audits following the October 10, March 10, and August 10 Filing Deadlines. The OCF will conduct full field audits of the campaign operations of all candidates newly elected to public office following the certification by the Board of Elections of the results of the November 4, 2014 General Election. The OCF will produce and distribute the Biennial Report of Contribution and Expenditure Data on January 31, 2015 for the prior two (2) year period. The OCF will continue to desk review at the close of each statutory filing deadline the financial reports of candidates, political committees, political action committees, independent expenditure committees, and the constituent service and statehood fund programs, for compliance with the reporting requirements; random audit the activity reports of the constituent service programs; 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.

Completion Date: September, 2015.

INITIATIVE 1.3: Improve the enforcement process.

The Office of the General Counsel will organize the conduct of site visits to the Early Voting Centers and to at least ten (10) of the Election Precincts operated by the Board of Elections in each of the eight (8) Wards for the November 4, 2014 General Election, and to the business offices of the principal campaign committees of candidates for local elective office, as well as to the offices of any other committees under the purview of the Office of Campaign Finance. The OCF staff will be dispatched to observe the activity in and around the Voting Centers and the Precincts, and the financial operations and activity of the offices of the various entities registered with the OCF. Staff will provide counsel where necessary concerning the proper application of the campaign finance laws. The Office of Campaign Finance will also review the OCF Regulations and Forms, and propose comprehensive amendments to conform with the changes required by the “Campaign Finance Reform and Transparency Amendment Act of 2013”, which Act will apply January 31, 2015. **Completion Date: September 2015.**

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

During FY13, 75.25% (757 of 985) of all financial reports filed with the Office of Campaign Finance were received electronically online at the OCF Web Site. 228 paper reports were submitted. It is anticipated that the number of paper reports submitted will dramatically decrease after January 31, 2015, the date upon which electronic filing becomes mandatory, pursuant to the “Campaign Finance Reform and Transparency Amendment Act of 2013”, unless actual hardship in complying is demonstrated. In FY15, there are approximately six (6) statutory filing deadlines which will occur on or before January 31, 2015, and the percentage of financial reports electronically filed during this period will most likely be similar to, if not exceed, that of FY13, at 75% of the total actually filed. The remaining 25% (paper reports), 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.

Completion Date: September 2015.

INITIATIVE 2.2: Fully implement the requirement for mandatory electronic filing of all financial reports by all reporting entities.

During FY15, the Office of Campaign Finance must fully implement those provisions of the “Campaign Finance Reform and Transparency Amendment Act of 2013”, which will apply January 31, 2015, and require the online submission of all reports filed with the OCF, unless actual hardship in complying is demonstrated. The OCF will draft and propose regulations for adoption to the Board of Elections to govern the electronic filing requirement and its exception. The OCF will notify all reporting entities of this



mandatory requirement through the OCF Web Site, the OCF Face Book Page, the OCF Forms, the issuance of reminder letters under the Filer Pre-Notification Program, and the published notices of proposed rulemaking in this area.

Completion Date: February 2015.

INITIATIVE 2.3: Electronic filing of the financial reports of Independent Expenditure Committees.

In FY15, the Office of Campaign Finance will upgrade the OCF Electronic Filing and Disclosure System to accept the administrative registration, online filing, and real time disclosure of the financial reports of the Independent Expenditure Committee newly established under the “Campaign Finance Reform and Transparency Amendment Act of 2013”. **Completion Date: February 2015.**

OBJECTIVE 3: Disseminate Financial Disclosure Records and Statistical Reports.

INITIATIVE 3.1: Upgrade of the Electronic Filing and Disclosure System.

During FY15, the Office of Campaign Finance will, consistent with the provisions of the “Campaign Finance Reform and Transparency Amendment Act of 2013”, upgrade the Electronic Filing and Disclosure System (the “E-Filing System”) to provide for the availability of the OCF Database via bulk download from the portal website to include all filer types in the data download. **Completion Date: January 31, 2015.**

INITIATIVE 3.2: Increase Availability of Summary Information.

During FY15, the Office of Campaign Finance will seek the upgrade of the E-Filing System to capture and offer a “dash board” option on the OCF Web Site. This option will give the public a quick view of various statistics maintained by the OCF specific to the then current election cycle, including the number of candidates and committee registrations by type, a listing of the latest report filings, report counts, and top donation recipients. The upgrade will enable the selection of the filer type to view more detailed information. To reach a greater audience, the OCF will post the “dash board” at the Agency Face Book Page. The OCF will also pursue the upgrade of the Search Feature of the System to enable a candidate search to select a specific individual and view the details of that candidate’s filings, financial summary, prior campaign history in the office, current filing history, filings due, penalties imposed, and complaints filed against the candidate or their committee. **Completion Date: September 2015.**



KEY PERFORMANCE INDICATORS – Office of Campaign Finance

Measure	FY 2013 Actual	FY 2014 Target	FY 2014 YTD³	FY 2015 Projection	FY 2016 Projection	FY 2017 Projection
Percent of informal hearings conducted and closed before the next filing deadline.	103.67%	100%	92.31%	100%	100%	100%
Percent of investigative matters closed within 90 days of opening.	100%	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 ⁴	75.25%	95%	89.96%	95%	98%	100%
Percent of Interpretative Opinions issued within 30 days	100%	100%	0% ⁵	100%	100%	100%
Percent of periodic random audits conducted of political committees following the January 31st and July 31st filing deadlines	108.33% ⁶	100%	75%	100%	100%	100%

³ Data is accurate as of July 22, 2014

⁴ The DC Council enacted legislation in FY14 to mandate 100% electronic filing, which will apply January 31, 2015

⁵ As of July 22, 2014, the Office of Campaign Finance has not received any requests for Interpretative Opinions

⁶ This percentage may exceed 100% where the number of audits conducted is more than the number of audit reports issued