

February 15, 2017

The Honorable Charles Allen
Member of the Council of the District of Columbia from Ward 6
Chairperson, Committee on the Judiciary & Public Safety
The John A. Wilson Building
1350 Pennsylvania Avenue, NW, Suite 110
Washington, D.C. 20004

Dear Chairperson Allen:

This is to submit on behalf of the Office of Campaign Finance (OCF), the enclosed Responses to your Questions regarding the performance of the Agency during Fiscal Year 2016.

If you require additional information, please let me know.

Respectfully,

Cecily E. Collier-Montgomery
Director

Enclosure

Responses to Performance Oversight Pre-Hearing Questions: Office of Campaign Finance
February 15, 2017

GENERAL QUESTIONS

1 Please provide a current organizational chart for the agency, including the number of vacant, frozen, and filled FTEs in each division or subdivision. Include the names and titles of all senior personnel, and provide the date that the information was collected on the chart.

- a. Please provide an explanation of the roles and responsibilities for each division and subdivision.**
- b. Please provide a narrative explanation of any changes made during the previous year.**

RESPONSE:

The Office of Campaign Finance (OCF) is organized into three major divisions which operate under the direction of the Office of the Director: the Office of the General Counsel (OGC); the Reports Analysis and Audit Division (RAAD); and the Public Information and Records Management Division (PIRM). The current Organizational Structure and Staffing Chart (February 2017) (**Attachment A**), and Organizational Charts for each OCF Division (February 2017) (**Attachment B**) are attached. The Office of Campaign Finance Functional Organization Chart (February 2017) is attached, and provides a breakdown of the responsibilities of each OCF Division. **See Attachment C.** The OCF currently has thirty (30) continuing full time positions.

The Office of the Director is responsible for planning, directing and coordinating the administrative operations of the Board of Elections pertaining to the Campaign Finance Act of 2011, as amended. The Director establishes policy and institutes clear directives to ensure the reasonable enforcement and administration of the Act.

The Director issues interpretative opinions; initiates investigations and informal hearings on violations of the Campaign Finance Act, and issues final decisions and imposes fines, where appropriate; and plans, directs, and coordinates the overall programs, as well as the administrative and legal functions of the Agency, and the educational outreach services. The administrative function of the Office of the Director includes budgeting, procurement, personnel, and overseeing the administration of the OCF Web Site, the Electronic Filing and Disclosure System, and the cross index system for documents filed within the OCF.

The Office of the General Counsel (OGC) is responsible for enforcement through directing investigations, conducting hearings, and rendering recommendations for decisions on charges of violations of the Campaign Finance Act. The Office of the General Counsel prepares draft regulations, recommends legislative changes, reviews OCF forms for changes, administers the Freedom of Information Act (FOIA), and interprets the Campaign Finance Act for appropriate application. This Office is also responsible for promoting through educational outreach (training seminars and mandatory entrance conferences) voluntary compliance for all filings, registrations, and activity requirements mandated by the Act.

The Reports Analysis and Audit Division (RAAD) is responsible for performing the audit analysis and review of all financial reports and other documents received in the Office. The Division conducts field audits and investigations based upon deficiencies and conditions noted during the Desk Audit reviews. The Division conducts periodic field audits, and compiles statistical reports and summaries for all reports of receipts and expenditures submitted by candidates, committees, and the Constituent Service and Statehood Fund Programs. This program area is the primary generator of compliance actions through audits and the monitoring of the financial disclosure of the financial operations of the Constituent Service and Statehood Fund Programs, candidates, principal campaign committees, political committees, political action committees, independent expenditure committees, and all others required to file with the Agency.

The Public Information and Records Management Division (PIRM) is responsible for providing public information online at the OCF Website and onsite in the OCF Offices; administering the records management and retention programs; compiling information for listings and reports published in the Biennial Report; managing the electronic filing of financial reports, the data entry of paper submissions, and the disclosure of information at the OCF Website; and making all reports and statements available for public inspection within forty-eight hours of receipt as statutorily mandated. The Division conducts the Filer Pre-Notification and Failure to File Programs.

- 2. Please provide a current Schedule A for the agency which identifies all employees by title/position, current salaries, fringe benefits, and program. This Schedule A should also indicate if the positions are continuing/term/temporary/contract and whether they are vacant or frozen positions.**
 - a. For each vacant position, please provide the status of the agency's efforts to fill the position, as well as the position number, title, program number, activity number, grade, salary, and fringe associated with each position. Separate salary and fringe. Please also indicate whether the position must be filled to comply with federal or local law.**
 - b. For each filled position, please provide the employee's length of service with the agency.**

RESPONSE:

The complete and current Schedule A for the Office of Campaign Finance is attached, which identifies all OCF employees by name, position title, current salary and fringe benefits, including the specific grade, series, and step of position, and program; whether the position held is continuing/term/temporary/contract, or vacant and/or frozen; the date the employee began in the position; and the status of the recruitment efforts for each vacant position. **See Attachment D.**

- 3. Please list all employees detailed to or from your agency, if any. For each employee identified, please provide the name of the agency the employee is detailed to or from, the reason for the detail, the date of the detail, and the employee's projected date of return.**

RESPONSE:

During FY 16, and as of this date in FY 17, the Office of Campaign Finance did not detail any employees from the Agency, nor did it have employees detailed to the Agency.

4. Please provide the Committee with:

- a. A list of all employees who received or retained cell phones, personal digital assistants, or similar communications devices at agency expense in FY16 and FY17, to date;**

RESPONSE:

The employees of the Office of Campaign Finance do not have cell phones, personal digital assistants, or similar communications devices at agency expense. All cell phones were disconnected on July 25, 2009, as a cost savings measure.

- b. A list of all vehicles owned, leased, or otherwise used by the agency and to whom the vehicle is assigned, as well as a description of all vehicle accidents involving the agency's vehicles in FY16 and FY17, to date;**

RESPONSE:

The Agency has one (1) Vehicle, a 2001 Ford Taurus. The Vehicle is assigned to Nadine Journiette, the Administrative Officer, April Williams, the Administrative Assistant, and Payam Zeraat, the Investigator. The Vehicle is used exclusively for government business. The Vehicle was not involved in any accidents in FY16, or FY17 to date.

- c. A list of employee bonuses or special award pay granted in FY16 and FY17, to date;**

RESPONSE:

There were no bonuses granted by the Office of Campaign Finance in FY16 and in FY17, to date.

- d. A list of travel expenses, arranged by employee for FY16 and FY17, to date, including the justification for travel; and**

RESPONSE:

There were no travel expenses incurred by the Office of Campaign Finance in FY 16 and in FY 17, to date.

- e. A list of the total overtime and workers' compensation payments paid in FY 16 and FY17, to date, including the number of employees who received overtime and workers' compensation payments.**

RESPONSE:

The Office of Campaign Finance did not pay overtime and workers' compensation in FY16, and as of this date, in FY17.

5. Regarding the use of communication devices:

- a. What procedures are in place to track which individuals or units are assigned mobile devices (including, but not limited to, smartphones, laptops, and tablet computers)? Please include how the usage of these devices is controlled.
- b. How does your agency limit the costs associated with its mobile devices?
- c. For FY16 and FY17, to date, what was the total cost including, but not limited to, equipment and service plans for mobile communications and devices?

RESPONSE:

See the Response to Question 4a. The Office of Campaign Finance did purchase in FY14, on March 31, 2014 four (4) Dell Latitude E 6330 Laptops (Cost: \$1,416.97 per device) for the use of the Audit Division when field audits are conducted offsite, and to present Power Point Instruction during Training Seminars. The Laptops are maintained by the Administrative Officer who uses a Log to record the date and purpose for usage, and requires the signature of the OCF Staff member for the receipt and return of the device. Each Laptop is assigned an OCF Property Number for identification purposes.

6. For FY16 and FY17, to date, please list all intra-District transfers to or from the agency.

RESPONSE:

The intra-District transfers received by or transferred from the Agency during FY16 or FY17, to date, are reported in the attached Chart of Intra-District and MOU Transfers. See Attachment E.

7. For FY16 and FY17, to date, please identify any special purpose revenue funds maintained by, used by, or available for use by the agency. For each fund identified, provide: (1) the revenue source name and code; (2) the source of funding; (3) a description of the program that generates the funds; (4) the amount of funds generated by each source or program; (5) expenditures of funds, including the purpose of each expenditure; and (6) the current fund balance.

RESPONSE:

The Office of Campaign Finance did not maintain, use, or have available for use, any special purpose revenue funds during FY16, and in FY17, to date.

- 8. For FY16 and FY17, to date, please list any purchase card spending by the agency, the employee making each expenditure, and the general purpose for each expenditure.**

RESPONSE:

The list of the purchase card spending is attached, with the name of the employee making each expenditure, and the general purpose for each expenditure for FY16 and FY17, to date. **See Attachment F.**

- 9. Please list all memoranda of understanding (MOU) entered into by your agency during FY16 and FY17, to date, as well as any MOU currently in force. For each, indicate the date on which the MOU was entered and the termination date.**

RESPONSE:

The list of all MOUs/Intra-District Transfers in place during FY16 and FY17, to date, is attached with the requested information. **See Attachment E.**

- 10. Please list the ways, other than MOU, in which the agency collaborated with analogous agencies in other jurisdictions, with federal agencies, or with non-governmental organizations in FY16 and FY17, to date.**

RESPONSE:

During the FY16 and FY17 to date, the Office of Campaign Finance (OCF) collaborated with the Office of the U.S. Attorney (OUSA) for the District of Columbia regarding an investigation into campaign finance violations by a local businessman. As a result of the investigation which included providing the OUSA with financial reports where contributions were made by this individual, the OUSA charged the individual with two campaign finance violations. OCF also sought information from the FEC concerning the organizational structure of the federal agency and the format of their job announcements.

Further, during FY16, the Office of the General Counsel consulted with analogous agencies in other jurisdictions including Connecticut, New York and Oregon regarding the public financing of political campaigns, relative to proposed legislation before the Council of the District of Columbia.

Finally in an effort to improve the Petition for Enforcement process, OCF entered into a Memorandum of Understanding in November 2016 with the Office of the General Counsel for the Board of Elections to assist with the drafting and filing of complaints in the Superior Court for the District of Columbia.

- 11. Please list all currently open capital projects, including an update on all capital projects under the agency's purview in FY16 and FY17, to date, and the amount budgeted, actual dollars spent, and any remaining balances. in addition, please provide:**

- a. An update on all capital projects begun, in progress, or concluded in FY15, FY16, and FY17, to date, including the amount budgeted, actual**

- dollars spent, and any remaining balances.
- b. An update on all capital projects planned for FY17, FY18, FY19, FY20, FY21, and FY22.
 - c. Do the capital projects begun, in progress, or concluded in FY15, FY16, or FY17, to date, have an impact on the operating budget of the agency? If so, please provide an accounting of such impact.

RESPONSE:

The Office of Campaign Finance did not have any projects for which capital funds were available to the Agency, in FY15, FY16, and FY17, to date. The Agency does not have capital projects planned for FY17, FY18, FY19, FY20, FY21, and FY22.

- 12. Please provide a list of all budget enhancement requests (including, but not limited to, capital improvement needs), for FY16 and FY17, to date. For each, include a description of the need and the amount of funding requested.**

RESPONSE:

The Office of Campaign Finance did not present budget enhancement requests for FY16 and FY17, to date.

- 13. Please list, in chronological order, every reprogramming in FY16 and FY17, to date, that impacted the agency, including those that moved funds into the agency, out of the agency, and within the agency. Include the revised, final budget for your agency after the reprogrammings for FY16 and FY17. For each reprogramming, list the date, the amount, the rationale, and the reprogramming number.**

RESPONSE:

There was one (1) reprogramming, in FY16, and one (1) reprogramming in FY 2017, to date, at the Agency's request. The reprogramming moved funds within the Agency, and the revised, final budgets for the Agency for FY16 and FY17 were not affected.

First, on February 10, 2016 (approved February 24, 2016), the Office of Campaign Finance requested the Reprogramming of \$74,000.00 of Fiscal Year 2016 Local Funds budget authority from Personal Services to Non-Personal Services to cover the cost of annual maintenance and upgrades for the E-Filing and Disclosure System (\$51,744.00); and for other operational costs (\$22,256.00).

Second, on December 27, 2016 (approved January 25, 2017), the Office of Campaign Finance requested the Reprogramming of \$30,000.00 of Fiscal Year 2017 Local Funds budget authority from Personal Services to Non-Personal Services. Funds were needed to cover the cost of upgrades and maintenance for the E-Filing System available at www.ocf.dc.gov. (\$53,772.96). See **Attachment G**, the Chart of FY16 and FY17, to date, Reprogramming.

14. Please list each grant or sub-grant received by your agency in FY16 and FY17, to date. List the date, amount, and purpose of the grant or sub-grant received.

RESPONSE:

The Office of Campaign Finance did not receive any grant or sub-grant in FY16 and FY17, to date.

15. How many FTEs are dependent on grant funding? What are the terms of this funding? If it is set to expire, what plans, if any, are in place to continue funding the FTEs?

RESPONSE:

The FTEs of the Office of Campaign Finance are not dependent on grant funding, and are funded solely through local funds.

16. Please list all pending lawsuits that name the agency as a party. Identify which cases on the list are lawsuits that potentially expose the District of Columbia to significant financial liability and/or will result in a change in agency practices, and the current status of the litigation. Please provide the extent of each claim, regardless of its likelihood of success. For those identified, please include an explanation about the issues involved in each case.

RESPONSE:

The Office of Campaign Finance, to date, is unaware of any pending lawsuits in which the Agency is named as a party.

17. Please provide the total number of administrative complaints or grievances that the agency received in FY16 and FY17, to date, broken down by source. Please describe the process utilized to respond to any complaints and grievances received and any changes to agency policies or procedures that have resulted from complaints or grievances received.

RESPONSE:

The Office of Campaign Finance did not receive any administrative complaints or grievances in FY16 and FY17, to date.

18. Please list and describe any ongoing investigations, audits, or reports on the agency or any employee of the agency, or any investigations, studies, audits, or reports on the agency or any employee of the agency that were completed during FY16 and FY17, to date.

RESPONSE:

The Office of Campaign Finance is unaware of any ongoing investigations, audits, or reports on the Agency or any employee of the agency, or any investigations, studies, audits, or reports on

the Agency or any employee of the Agency that were completed during FY 16 and FY17, to date.

19. Please describe any anticipated spending pressures for the remainder of FY17. Include a description of the pressure, the estimated amount, and any proposed solutions.

RESPONSE:

The Office of Campaign Finance is not facing spending pressures for FY17. However, in the event the campaign reform legislation proposed in Calendar Year 2016 is reintroduced and becomes law, additional funds will be needed to upgrade the Electronic Filing System to fully implement the new reporting requirements. Specifically, the proposals are Bill 21-0442, the “Political Action Committee Contribution Regulation Amendment Act of 2015”; Bill 21-0509, the “Citizens Fair Election Program Amendment Act of 2015”; Bill 21-0511, the “Clean Elections Amendment Act of 2015”; Bill 21-0565, the “Elucidating Your Elections Amendment Act of 2016”; and Bill 21-0622, the “Campaign Finance Transparency and Accountability Amendment Act of 2016”.

At a minimum, with the exception of Bill 21-0509, the “Citizens Fair Election Program Amendment Act of 2015”, the proposed amendments will increase the enforcement and audit responsibilities of the Office of Campaign Finance. In the first instance, the OCF Audit Division will review the reports of receipts and expenditures to ensure compliance with the new reporting requirements and prohibitions. The OCF Office of the General Counsel will initiate enforcement actions where violations of the Act occur. The Agency’s FY 2017 approved budget of \$2,833,463.00 allocates \$2,726,012.00 to the personal services budget to fund the 30 continuing full time positions of the Office of Campaign Finance. The existing staffing levels of the Agency will enable the OCF to assume the increased audit and enforcement responsibilities anticipated under these proposals.

The funds allocated to the non-personal services budget, \$107,457.00, however, will not support the upgrades required by the various proposals. The FY 2017 budget in this area (object class 40), \$97,451.00, barely supported the projected annual maintenance costs of the OCF Electronic Filing and Disclosure System (\$53,772.96); the annual recruitment and staffing support services from the Department of Human Resources (\$15,000.00); annual fleet services from the Department of Public Works (\$11,626.78); infrastructure support services from the Office of the Chief Technology Officer (\$15,544.29); and annual copier maintenance (\$7,043.76). To fully fund these costs, the Agency requested on December 27, 2016 (approved January 11, 2017), the reprogramming of \$30,000 of FY 17 Local Funds budget authority from Personal Services to Non-Personal Services.

Consequently, additional funding will be required to secure the following upgrades and enhancements to the OCF Electronic Filing and Disclosure System (EFS) required under the various proposals. The vendor who developed the OCF Electronic Filing System, and who has been responsible for its annual maintenance and subsequent upgrades, provided the very rough estimate of costs for the upgrades in the total sum of \$76,320.00.

Specifically, **Bill 21-0565, the “Elucidating Your Elections Amendment Act of 2015”** will require political committees to file reports on the 31st day of July in each year in which there is no election, and political action committees and independent expenditure committees to file

reports on the 31st day of April, July, and October of each year in which there is no election; and will impose a contribution limit of \$2000 for a political action committee.

This proposal will require: (1) the upgrade of the e-filing applications to capture the 30th day of April (proposed corrected day) and the 31st day of October as new reports under “type of report” due by political action committees and independent expenditure committees in a non-election year, and to enable the e-filing of the reports on those dates; and (2) the modification of the administrative and public modules for the e-filing applications, Schedule A, to recognize the new limit of \$2000 for contributions specific to this filer type, and the excel import feature, to remove the current limit of \$5000, and to raise a red flag to the filer of the data entry of any contribution which exceeds the \$2000 contribution limit.

It should be noted that new contribution limitations for political action committees, and increased financial reporting dates for political action committees and independent expenditure committees were established by D.C. Act 21-0584, the “Campaign Finance Reform and Transparency Emergency Amendment Act of 2016”, effective December 24, 2016. The Act expires on March 24, 2017. The Act increases the reporting cycles for political action committees and independent expenditure committees during nonelection years to include the 10th days of April and October, and applies the current contribution limitation of \$5,000 to political action committees during nonelection years. The OCF E-Filing System has been upgraded to capture the 10th day of both April and October as new reports under the “type of report” due by political action committees and independent expenditure committees in a non-election year, and to enable the e-filing of the reports on those dates. The administrative and public modules have been modified for the e-filing applications, Schedule A, to recognize the application of the current limit of \$5000 for contributions specific to the political action committee during the non-election year. The excel import feature was also modified to raise a red flag to the filer of the receipt of any contribution entered which exceeds the \$5000 contribution limit.

Bill-21-0442, the “Political Action Committee Contribution Regulation Amendment Act of 2015”, will not require the upgrade of the e-filing and disclosure system.

The impact of **Bill 21-0509, the “Citizens Fair Election Program Amendments Act of 2015”** on the Office of Campaign Finance is unclear. If the legislation renames the agency, at a minimum, the oversight responsibilities associated with the management of an “elections fund” and the certification process required for participation in the public funding of political campaigns will require an audit unit solely dedicated to that process, with associated personnel costs. In addition, the system will require the development of an online financial reporting system unique to the pre-certification and post certification accounting, with associated costs.

Bill-21-0511, the “Clean Elections Amendment Act of 2015” will revise the certification required by the independent expenditure committee to include language which specifically states that the committee “is not controlled by, has not coordinated with, and has made no contributions or transfer of funds to any public official”; and will prohibit contributions to a political committee or a constituent service program from any person other than an individual. This proposal will require the modification of the certification text of the independent expenditure committee on the e-filing application for the report of receipts and expenditures by this filer type; and require the modification of the import module of Schedule A for both the Constituent Services Report (OCF Form 10) and the Report of Receipts and Expenditures for the political

committee (OCF Form 16) to eliminate the following contributor types: labor, business, and other; and the sub-category, business type.

Bill 21-0662, the “Campaign Finance Transparency and Accountability Act of 2016”, will revise the certifications of political action committees and independent expenditure committees to specifically state that to the best of their knowledge, after due diligence, the expenditures it has made have not been controlled by or coordinated with any covered campaign, and that none of the contributions or donations it has received were solicited as defined under the proposal by any covered campaign. The proposal will require the modification of the certification text for these filer types of the e-filing applications of the Reports of Receipts and Expenditures to include the new language. Further, a certification will be required by any person other than a committee who makes one or more independent expenditures in excess of \$50.00 and files reports, to certify that the individual expenditures were not coordinated with any “covered campaign” as defined by the bill; and independent disclosures will be required by “covered organizations”. These amendments will require the upgrade of the e-filing applications to include the new certification text by the person on their financial report that the independent expenditure was not coordinated by a “covered campaign”; and the development of new e-filing applications with Schedules (A & B) to enable the receipt of financial reports from covered organizations with the enumerated disclosures, including receipts and expenditures, and certifications. In addition, this amendment will require the creation of an administrative registration module to accept information key to the identity of the filer and to establish login credentials. The administrative module will manage the registrations and the filings.

Lastly, the Bill will require political action committees to establish contribution accounts to finance the contributions made to any public official, political party, political committee, political action committee, or independent expenditure committee. This amendment will require the creation of new Schedules (A & B) for the e-filing application for the Report of Receipts and Expenditures for this filer type to disclose the receipts and expenditures from the contributions account. This listing of contributions will be subject to limitations, and the respective committee will be required to identify any receipts that have been allocated to the “contribution account”. The amendment will also require the revision of the module for the statement of organization for the political action committee to include the designation of the “contribution account”, and the listing of the account’s number and bank location.

20. Please provide a copy of the agency’s FY16 performance plan. Please explain which performance plan objectives were completed in FY16 and whether they were completed on time and within budget. If they were not, please provide an explanation.

RESPONSE:

The copy of the FY16 Performance Plan and Report for the Office of Campaign Finance is attached. **See Attachment H.** The Office of Campaign Finance fully achieved all of its Initiatives on time and within budget as detailed in the Report.

21. Please provide a copy of your agency’s FY17 performance plan as submitted to the Office of the City Administrator.

RESPONSE:

The FY17 Performance Plan for the Office of Campaign Finance is attached as submitted to the Office of the City Administrator. **See Attachment I.**

22. Please provide the number of FOIA requests for FY16 and FY17, to date submitted to your agency. Include the number granted, partially granted, denied, and pending. In addition, please provide the average response time; the estimated number of FTEs required to process requests, the estimated number of hours spent responding to these requests, and the cost of compliance.

RESPONSE:

During FY16 and FY17 to date, the Office of Campaign Finance received three (3) FOIA requests from members of the media and the public. The two (2) requests from the media were granted: the first request granted was provided within six (6) days of receipt; and the response to the second request granted was provided within fourteen (14) days of receipt. The third FOIA request from a private citizen was denied because the OCF did not possess the information which was requested. The denial was issued within three (3) days of receipt of the request. The requests were processed by one FTE; and there were no costs associated with compliance

23. Please provide a list of all studies, research papers, reports, and analyses that the agency prepared, or contracted for, during FY16 and FY17, to date. Please state the status and purpose of each. Please submit a hard copy to the Committee.

RESPONSE:

First, on January 31, 2017, the Office of Campaign Finance issued and presented in an electronic format the 2017 Biennial Report of Contributions and Expenditures to the Mayor and the Council of the District of Columbia for the period from January 2015 through December 2016. The campaign finance laws require the Director to make a Biennial Report to the Mayor, the Council, and the general public, commencing January 31, 2001, and every two years thereafter, on January 31st. The report describes the receipts and expenditures of candidates for elective office, with the exception of ANC candidates, and principal campaign committees for the prior two year period, in dollar amount and percentage terms, by donor categories and size of the donation, and expenditure type. Graphs are used to present the percentage terms. The receipts and expenditures of the political action committees, independent expenditures, and the exploratory, inaugural, transition, and legal defense committees must also be summarized. The Report was presented in an electronic format, and made available for members of the public at the OCF Web Site, the OCF Offices, and in the Washingtoniana Room of the Martin Luther King, Jr. Memorial Library. **See Attachment J**, the correspondence dated January 31, 2017 and addressed to the Honorable Charles Allen, Member of the Council of the District of Columbia from Ward 6, which forwarded the 2017 Biennial Report.

Second, the Office of Campaign Finance conducted extensive research and provided analyses relative to the issue of the District of Columbia adopting a public financing program. The research revealed that the purpose of adopting a public financing system is not to create different

winners and losers but to create a more robust participation in the electoral process by increasing both the racial and socioeconomic diversity of the small donor pool.

However, the outcomes of public financing programs are not always as transformative as might be expected. A study conducted by the Brennan Center for Justice at NYU School of Law and the Campaign Finance Institute in 2012 found that New York City's public financing system did significantly increase both the racial and socioeconomic diversity of the small donor pool. The increase in small donor activity was also accompanied by an increase of spending by independent expenditure committees who used their unlimited spending power to get their message across. During the 2013 New York City council races, candidates were outspent as much as 3-to-1 by outside groups. The Research Report is attached. **See Attachment K.**

- 24. Please separately list each employee whose salary was \$100,000 or more in FY16 and FY17, to date. Provide the name, position number, position title, program number, activity number, salary, and fringe. In addition, state the amount of any overtime or bonus pay received by each employee on the list.**

RESPONSE:

The list of each OCF employee whose salary was \$100,000 or more in FY16 and FY17, to date, is attached with the requested information provided. **See Attachment L.**

- 25. Please list in descending order the top 25 overtime earners in your agency in FY16 and FY17, to date, if applicable. For each, state the employee's name, position number, position title, program number, activity number, salary, fringe, and the aggregate amount of overtime pay earned.**

RESPONSE:

There were no employees in the Office of Campaign Finance who earned overtime in FY16 and FY17, to date.

- 26. For FY16 and FY17, to date, please provide a list of employee bonuses or special award pay granted that identifies the employee receiving the bonus or special pay, the amount received, and the reason for the bonus or special pay.**

RESPONSE:

The Office of Campaign Finance did not grant employee bonuses or special award pay during FY16 and FY17, to date.

- 27. Please provide each collective bargaining agreement that is currently in effect for agency employees. Please include the bargaining unit and the duration of each agreement.**

RESPONSE:

There is no collective bargaining agreement in effect for the employees of the Office of Campaign Finance.

- 28. If there are any boards or commissions associated with your agency, please provide a chart listing the names, confirmation dates, terms, and wards of residence of each member. Include any vacancies. Please also attaché agendas and minutes of each board or commission meeting in FY16 of FY17, to date, if minutes were prepared. Please inform the Committee if the board or commission did not convene during any month.**

RESPONSE:

The Office of Campaign Finance is established within the Board of Elections (the Board), an independent Agency of the District Government. The Board is comprised of three (3) members. The Office of Campaign Finance is responsible for the administrative operations of the Board under the Campaign Finance Act of 2011, as amended. See D.C. Official Code, § 1-1163.02. The Board is created under D.C. Official Code §1.1101.02. The Executive Director of the Board is responsible for managing the daily operations of the Board, which includes the scheduling of the monthly public meetings of the Board, the preparation of the meeting agenda, and maintaining the minutes of the meeting, as well as the records relative to the service of the Board Members.

- 29. Please list all reports or reporting currently required of the agency in the District of Columbia Code or Municipal Regulations. Provide a description of whether the agency is in compliance with these requirements, and if not, why not (e.g. the purpose behind the requirement is moot, etc.).**

RESPONSE:

D.C. Official Code, § 1-1163.04 (7) (2001 Edition, as amended), requires the Director of the Office of Campaign Finance to present to the Mayor, the Council, and the general public, commencing January 31, 2001, and every two years thereafter, a biennial report, summarizing, for the prior two year period, the receipts and expenditures of candidates for public office (except candidates for Advisory Neighborhood Commission Member), and of political committees, including principal campaign, exploratory, inaugural, transition, and legal defense committees; political action committees; and independent expenditures. The Agency is in compliance with this requirement. The most recent OCF Biennial Reports (2011, 2013, 2015, and 2017) may be viewed at the OCF Website, www.ocf.dc.gov.

On January 31, 2017, the Agency presented the OCF 2017 Biennial Report of Contributions and Expenditures to the Mayor and the Council of the District of Columbia, and to the public. The Report describes the receipts and expenditures of candidates for elective office, with the exception of ANC candidates, for the prior two year period, in dollar amount and percentage terms, by donor categories and the size of the donation, and expenditure type. Graphs are used to present the percentage terms. The receipts and expenditures of the political committees, political action committees, and independent expenditure committees are also summarized. For the first time, the January 2017 Biennial Report presents a listing and chart depicting the “Top Three Committees by Contributions Received” during the past two year period by in Part I. Candidates

and Principal Campaign Committees”, by office type; Part II, the Political Action Committees; Part III, Independent Expenditures; Part IV, Inaugural Committees; and Part V, Exploratory Committees.

30. Please list each contract, procurement, lease, and grant awarded, entered into, extended and option years exercised, by your agency during FY16 and FY17, to date. For each contract, please provide the following information, where applicable:

- a. The name of the contracting party;**
- b. The nature of the contract, including the end product or service;**
- c. The dollar amount of the contract, including budgeted amount and actually spent;**
- d. The term of the contract;**
- e. Whether the contract was competitively bid;**
- f. The name of the agency’s contract monitor and the results of any monitoring activity; and**
- g. Funding source.**

RESPONSE:

The list of each contract, procurement, lease, and grant awarded, entered into, extended, and option years exercised, by the Office of Campaign Finance during FY16 and FY17, to date, is attached, with the requested information provided for each. **See Attachment M.**

31. Please provide a list of any additional training or continuing education opportunities made available to agency employees. For each additional training or continuing education program, please provide the subject of the training, as well as the number of agency employees that were trained.

RESPONSE:

During FY 16, the Office of Campaign Finance diversified course offerings and increased public and private sector partnerships enhancing the Professional Development Program for the OCF employees. The seminars and workshops scheduled for managers and staff provided continuing learning opportunities and career advancement. The courses offered included Active Threat and Security Awareness, ePerformance for Managers and division specific seminars such as Developing and Presenting Audit Findings and legal courses. New Professional Development Partnerships now a part of the program include the District of Columbia’s Protective Services agency and the Graduate School USA. The knowledge gained during the training increases employee learning, abilities and curiosity. Employees are better equipped to carry out their duties and responsibilities which is paramount to helping OCF meet its and the District’s mission, goals and objectives. The Workforce Development statistics include a total of six on-site training seminars, 7 off-site seminars, 2 on-line training sessions, 1 division specific course/seminar, 6 DC Bar courses, and 4 Information Technology course/trainings. The courses provided are listed below.

FY 16 Professional Development Statistics

FY 16 Workforce Development Statistics

(On-Site)

Date	Name of Course/Seminar	Number of Participants
3/3/2016	Active Threat and Security Awareness	16
4/13/2016	In House Audit Training	10
5/11/2016	Language Access	12
9/13/2016	Basic Writing	8
9/14/2016	Basic Writing	7
9/20/2016	Presentation Skills	16

(Off-Site)

Date	Name of Course/Seminar	Number of Participants
10/19/2015	ePerformance Management Training for Supervisors	4
12/8/2015	ePerformance for Managers	2
12/16/2015	ePerformance for Employees	11
1/13/2016	ePerformance for Managers	1
1/21/2016	ePerformance for Employees	12
6/29-30/2016	Writing Essentials	4
7/12-13/2016	Writing Essentials	5

(Online)

Date	Name of Course/Seminar	Number of Participants
7/21/2016	Ethics for DC Employees	1
7/12/2016	Maintaining an Engaging Organization	1

FY 16 Specialized Training Statistics

Audit Courses

Date	Name of Course/Seminar	Number of Participants
9/27-28/2016	Developing and Presenting Audit Findings	11

Legal Courses-DC Bar

Date	Name of Course/Seminar	Number of Participants
7/11/2016	Ways to Improve Your Legal Writing Center	1
7/12/2016	Most of What You Really Wanted to Know About Legal Ethics, You Already Learned in Kindergarten	4
7/22/2016	Effective Writing for Lawyers Workshop	1
9/16/2016	E-mail Communications for Lawyers	2
11/29/2016	Litigation Ethics	1

<i>Information Technology Stats</i>		
Date	Name of Course/Seminar	Number of Registrants
8/10/2016	Introduction to HTML5 Course Team	1
8/31/2016	Introduction to Css3 Course Team	1
3/25/2016	Introduction to HTML5 Course Team-DCHR	1
3/9/2016	Introduction to Information Security	1

- 32. Does the agency conduct annual performance evaluations of all its employees? Who conducts such evaluations? What steps are taken to ensure that all agency employees are meeting individual job requirements?**

RESPONSE:

The Office of Campaign Finance conducts annual performance evaluations of all employees in accordance with the District of Columbia Personnel Manual. The evaluation of the performance of line employees is conducted by the Division Managers for the employees who are assigned to their respective Divisions. The Director evaluates the performance of the OCF Managers, namely, the General Counsel, the Audit Manager, the Public Affairs Manager, the Training Officer, and the Administrative Officer. The OCF Managers, as well as Supervisors serving within a Division, are responsible for the evaluation of the employees who serve under their direct supervision. All employees are evaluated following the close of the performance plan period, which begins on October 1st and ends on September 30th of each year. A Performance Plan is developed for each employee to state goals which are directly related to the job duties and responsibilities of the position held by the individual, and support the mission of the Agency. The work of each employee is monitored and reviewed throughout the performance period to ensure the completion of projects and the accuracy of tasks assigned. Moreover, because a significant number of the outputs of the Office of Campaign Finance are time sensitive, this affords another marker by which to measure performance. Where the performance of employees requires improvement, the OCF Manager is required to plan divisional training, and to meet quarterly with the affected employees to reassess performance and provide feedback to ensure progressive career growth.

The Agency has implemented an informal mid-year review process designed to monitor the progress of employees, and to assist staff in overcoming any deficiencies in their performance. All Managers recently completed in the first Quarter of FY16, the “ePerformance for Supervisors”, Training which focuses on the enhancement of management skills in the planning, tracking, and documenting the performance of employees in the evaluation process. The OCF line employees were also provided training on the evaluation process.

The OCF Training Officer works with the OCF Managers to identify areas where training may improve or enhance the job performance of employees, on an individual basis, and to plan and locate educational opportunities for the employees at large on an annual basis through the DCHR Workforce Development Administration and with the D.C. Bar. During FY 2016, the Training Officer planned and scheduled Professional Development Courses for employees through the Workforce Development Administration; specialized training for the Audit Branch; and coordinated specialized training for the Office of the General Counsel through the D.C. Bar.

AGENCY OPERATIONS

- 1. Please describe any initiatives that the Agency implemented in FY16 of FY17, to date, to improve the internal operations of the Agency or the interaction of the agency with outside parties. Please describe the results, or expected results, of each initiative.**

RESPONSE:

First, the Standard Operating Procedures of the Desk Review Process (Request for Additional Information RFAI) of the Reports Analysis and Audit Division were revised in FY 16 to add several areas where further inquiry must be made by the Audit Division to ensure the accuracy of financial reports. Specifically, during the desk review of Reports of Receipts and Expenditures, the Audit Division will query through the issuance of the RFAI Letter, the efforts of a principal campaign committee to terminate following the end of the election cycle during which their candidate participated, and to address debt owed by the committee; whether the associated candidate of all newly registered principal campaign committees had a connected exploratory committee; on whose behalf the campaign expenditures of either a Political Action Committee or an Independent Expenditure Committee were made where omitted on financial reports; where the receipts of a “business contributor” are the maximum allowed for a particular candidate or committee, whether affiliated businesses have contributed to the same candidate/committee. In addition, the RFAI Letter requests the submission of source documents where contributions and/or loans are made to a principal campaign committee by a candidate; and copies of invoices and/ or contracts where the purpose of an expenditure is reported as “consulting”. Standard language is included in the RFAI Letter to remind each filer of the requirement to list the names of the affiliated entities of business contributors that have also contributed to the filer. The responses to the RFAs are scanned (by PIRM) to create stored records. It is expected that these inquiries during the Desk Review Process will result in more accurate reporting by reporting entities, aid in the increased transparency of campaign operations, and foster compliance with the Campaign Finance Laws.

During FY 17, the Standard Operating Procedures for the Audit Division were further revised to provide for the Desk Review of the ANC Summary Financial Statement (OCF Form 18). The Summary Financial Statement of the Candidate for the Office of Member of an ANC must include the total receipts and expenditures relative to seeking election to the ANC Office; the cash on hand at the close of the reporting period; the total amount of debts and obligations owed to and owed by the ANC candidate; the method of disposal of surplus funds; certification that the ANC candidate did not receive contributions from any person excluding the candidate, in excess of twenty-five (\$25) dollars; or a certification that the ANC candidate did not receive contributions from any person or make expenditures, including from or by the candidate, to support the election to the ANC Office. The deadline for the filing of the ANC Summary Financial Statement was January 17, 2017. As of this date, the Audit Division has conducted the desk review of 266 Summary Financial Statements of ANC Candidates. This initiative will ensure accurate reporting by the ANC Candidate.

Second, the Office of Campaign Finance expanded its Educational Program in FY 16 to focus on the ANC Candidate. As you know, the Board of Elections conducted at the November 8, 2016 General Election, the election of the candidates for the Office of Member of an Advisory

Neighborhood Commission (ANC). There were approximately 443 active candidates in this Election, and on November 18, 2016, the Board certified 276 candidates as the winners in their respective Single Member Districts. The District of Columbia Municipal Regulations, at Chapter 30, "Elections and Ethics", Section 3002.6, require that each ANC Candidate, regardless of the outcome of the election, win or lose, file the Summary Financial Statement of Candidate for the Office of Member of an Advisory Neighborhood Commission (ANC) (OCF Form 18), no later than sixty (60) days after the certification of the election results. To better address the reporting responsibilities of the ANC Candidate during the 2016 Election Cycle, the Office of Campaign Finance revised the OCF 2016 Schedule of Training Seminars to offer comprehensive training dedicated solely to the ANC Candidate. The ANC candidates in all eight (8) Wards of the District of Columbia were invited. The Seminars titled "Understanding the Rules of the Game: A Campaign Finance Playbook for Advisory Neighborhood Commission (ANC) Candidates" were held on September 15, 2016, and on October 6, 13, and 20th, 2016 in the Office of Campaign Finance. The revised 2016 Schedule of Training Seminars (Revised) was published at the OCF Website on September 9, 2016. A total of 59 ANC Candidates participated in the training sessions, and received a Certificate of Completion. Notices of the ANC Training were also published at the OCF Face Book Page and at the OCF Twitter Account.

To further assist the ANC Candidate, the Office of Campaign Finance developed and introduced online on September 29, 2016, the narrated training module, "Understanding the Rules of the Game: A Campaign Finance Playbook for Advisory Neighborhood Commission (ANC) Candidates". The module was designed to familiarize the user with the reporting requirements for the ANC candidacy. ANC candidates were notified by email blast of the availability of the tutorial and the login codes for access at the OCF Website. Thirty-four (34) individuals completed the ANC Tutorial.

Third, On November 16, 2016, the OCF General Counsel and the BOE General Counsel entered into a Memorandum of Understanding (MOU) concerning the protocol for the preparation and filing of pleadings to expedite the initiation of actions in the Superior Court of the District of Columbia once the Board of Elections approves the OCF Petitions for the enforcement of its fines. The Board serves as the oversight authority for the Office of Campaign Finance, as well as the appellate body which adjudicates cases referred by the Agency for the enforcement of the OCF Orders imposing fines which are unpaid. Specifically, pursuant to 3 DCMR 3711.9, the Director may petition for enforcement of its Orders before the Board in an open and adversarial hearing within sixty (60) days after the expiration of the period provided for the payment of any fine. Many of these cases are settled prior to adjudication before the Board. However, others result, in referral, through the Board, to the Superior Court to affirm, modify or remand the Order to affect closure of the cases. Due to the increased staffing levels of the OCF Office of the General Counsel, the OCF will assist in the preparation and filing of associated pleadings directly with the Civil Division of the Superior Court.

2. What are the agency's top five priorities? Please explain how the agency expects to address these priorities in FY17.

RESPONSE:

The top five (5) priorities for the Agency during Fiscal Year 2017 are the following:

- (1) The timely, effective, and objective execution of the responsibilities of the Agency associated with core mission and support functions directly related to the collection, review, and disclosure of financial reports, and enforcement responsibilities for the candidates and committees who participated in the 2016 General Election, continuing committees, and the Constituent Service and Statehood Fund Programs. The Agency organized the conduct of site visits by the OCF Staff 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 Wards during the November 8, 2016 General Election, and to the business offices of the principal campaign committees of candidates participating in the election. The purpose of the site visits is to afford the Agency the opportunity to be present in the community and available to the public to respond to questions, and to assist the public in understanding their obligations under the Campaign Finance Act, and the role of the Office of Campaign Finance in administering the Act. Through the Audit Program, the Agency will ensure compliance with the reporting requirements, and the complete and accurate representation of campaign financial activity through the full field audit of the campaign operations of candidates newly elected to Office following the certification of the results of the November 2016 General Election. The Office of Campaign Finance will conduct Desk Reviews of all Reports of Receipts and Expenditures filed with the Agency throughout the Fiscal Year, and conduct periodic audits of the financial reports of the Constituent Service Programs, following the close of the October 1st and April 1st Filing Deadlines, and of the continuing committees following the January 31st and July 31st Filing Deadlines.

The periodic audit requires the reporting entity to submit all banking records and statements, invoices, loan documents, and receipts maintained in support of the transactions reported during the coverage period. This will allow the Audit Division to verify entries against the supporting documentation and ensure the accuracy of the financial transactions. Where there is noncompliance with the reporting requirements, the Office of the General Counsel will proceed with the initiation of enforcement actions (the informal hearing process/the initiation of complaints) to swiftly and fairly resolve these issues, and inform the public of the disposition.

In addition, the Agency will focus on its responsibility to administer the provisions of D.C. Act 21-0584, the “Campaign Finance Reform and Transparency Emergency Amendment Act of 2016”, effective December 24, 2016. The Act expires on March 24, 2017. The Act increases the reporting cycles for political action committees and independent expenditure committees during nonelection years to include the 10th days of April and October, and applies the current contribution limitation of \$5,000 to political action committees during nonelection years. The OCF E-Filing System has been upgraded to capture the 10th day of both April and October as new reports under the “type of report” due by political action committees and independent expenditure committees in a non-election year, and to enable the e-filing of the reports on those dates. The administrative and public modules have been modified for the e-filing applications, Schedule A, to recognize the application of the current limit of \$5000 for contributions specific to the political action committee during the non-election year. The excel import feature was also modified to raise a red flag to the filer of the receipt of any contribution entered which exceeds the \$5000 contribution limit. The

Agency will desk review the additional reports for compliance with the reporting requirements, and will pursue enforcement where there is non-compliance

The Agency through the E-Filing and Disclosure System will provide real time disclosure of all financial reports electronically filed, and the data entry of all paper submissions to facilitate the disclosure of these reports within 48 hours of receipt. Overall, these efforts will collectively serve the public interest by ensuring that the electorate has accurate information upon which it can rely to make educated, informed decisions during the election process.

Finally, to become more effective in the pursuit of enforcement actions before the Board of Elections where fines imposed by Orders of the Director have not been paid, the OCF entered into a Memorandum of Understanding with the Office of the General Counsel for the Board to assist with the drafting and filing of complaints in the Superior Court for the District of Columbia.

- (2) The evaluation of the results of the Online Survey published at the OCF Website in August 2016 to assess the effectiveness and efficiency of the redesigned OCF E-Filing Applications and Web Site to deliver information and services. The Survey closed for comment on December 31, 2016. The original OCF Website and E-Filing System were designed in Fiscal Year 2002. As previously reported, the Office of Campaign Finance during Fiscal Years 2013 and 2014, worked closely with the Office of the Chief Technology Officer to redesign the OCF homepage layout and navigation scheme. The redesign required the migration of the OCF database content and EFs applications to the new DC.Gov Drupal content management system. On April 15, 2015, the new OCF Website launched. The conversion of the website to the new easier web platform has improved navigation and performance, and provided a more citizen centric layout of information with a contemporary look and feel. The results of the Online Survey will aid the Office of Campaign Finance in its ongoing effort to ensure the disclosure, transparency, and easy access by the public of the financial reports received by the Agency. The OCF will consider and implement the recommendations, if any, of the Survey, where feasible.
- (3) Development of the Database of Expedited Advice. The OCF Office of the General Counsel will create a database of advice issued concerning time-sensitive election related matters, numbered in chronological order and sorted by topic, for public search at the OCF Website. Because of time constraints, the requests for expedited advice are addressed within fifteen (15) days of receipt and are distinguished from requests for interpretative opinions. The creation of the database will provide an additional resource for the public relative to the application of the campaign finance laws, and a reference point for OCF to ensure the consistency of advice.
- (4) Dissemination of the January 2017 Biennial Report. The Office of Campaign Finance produced and disseminated in an electronic format on January 31, 2017, the OCF Biennial Report of Contributions and Expenditures to the Mayor and the Council of the District of Columbia, and to the public. The Report describes the receipts and expenditures of candidates for elective office, with the exception of ANC candidates, for the prior two year period, in dollar amount and percentage terms, by donor

categories and the size of the donation, and expenditure type. Graphs are used to present the percentage terms. The receipts and expenditures of the political committees, political action committees, and independent expenditures were also summarized. For the first time, the January 2017 Biennial Report presents a listing and chart depicting the “Top Three Committees by Contributions Received” during the past two year period in Part I, Candidates and Principal Campaign Committees”, by office type; Part II, the Political Action Committees; Part III, Independent Expenditures; Part IV, Inaugural Committees; and Part V, Exploratory Committees.

- (5) Educational Outreach. The Office of Campaign Finance will reinforce to the filing community through educational outreach, onsite training and social media platforms, the new contribution limitations for political action committees, and the increased financial reporting dates for political action committees and independent expenditure committees established by D.C. Act 21-0584, the “Campaign Finance Reform and Transparency Emergency Amendment Act of 2016”, effective December 24, 2016. The Act expires on March 24, 2017. Specifically, the reporting cycles for political action committees and independent expenditure committees during nonelection years are increased to include the 10th days of April and October, and the current contribution limitation of \$5,000 is applied to political action committees during nonelection years. The Agency will provide clear instruction and guidance on the new reporting requirements through the mandatory training conferences for new candidates and treasurers; the onsite educational seminars scheduled throughout Calendar Year 2017; and the Pre-Notification and Request for Additional information Programs. The conferences and seminars provide the opportunity for participants to speak directly with Senior Staff concerning the application of the campaign finance laws, the audit and enforcement programs of the Agency, and the electronic filing of financial reports. The goal of the Educational Outreach Program is to promote voluntary compliance and deter future violation of the reporting requirements.

3. Please list each new program implemented by the agency during FY 16 and FY 17, to date. For each initiative please provide:

- a. A description of the initiative;**
- b. The funding required to implement the initiative; and**
- c. Any documented results of the initiative.**

RESPONSE:

I. FY16 Programs

First, the Office of Campaign Finance expanded the OCF Educational Program to introduce an interactive online training tutorial on the basics of the campaign finance laws necessary to launch a successful campaign; provided onsite training and developed an online training module to specifically address the reporting requirements of candidates for the Office of Advisory Neighborhood Commission Member, which continued into FY 17; and revised the online tutorials for the successful e-filing of financial reports. The Agency routinely evaluates the effectiveness of its Public Educational Program to reach the broadest audience for the dissemination of information, and increase voluntary compliance with the Campaign Finance Act of 2011, as amended.

The Interactive Training Module provides a further opportunity for the public to become familiar with and understand the laws of the District of Columbia which govern campaign operations, as amended by the provisions of the “Campaign Finance Reform and Transparency Amendment Act of 2013”, applicable January 31, 2015. The Module focuses on the reporting of contributions from business entities, bundled contributions, and independent expenditures, the increased certifications, and other areas of the Campaign Finance Act which require specialized treatment. The Tutorial invites the user to test their knowledge and understanding of the information presented through a series of factual patterns. The Interactive Training Tutorial was first made available to the public at the OCF Website, www.ocf.dc.gov, on June 22, 2016. The duration of the Tutorial is six (6) minutes and twenty (20) seconds.

As you know, the Board of Elections conducted at the November 8, 2016 General Election, the election of the candidates for the Office of Member of an Advisory Neighborhood Commission (ANC). There were approximately 443 active candidates in this Election, and on November 18, 2016, the Board certified 276 candidates as the winners in their respective Single Member Districts. The District of Columbia Municipal Regulations, at Chapter 30, “Elections and Ethics”, Section 3002.6, require that each ANC Candidate, regardless of the outcome of the election, win or lose, file the Summary Financial Statement of Candidate for the Office of Member of an Advisory Neighborhood Commission (ANC) (OCF Form 18), no later than sixty (60) days after the certification of the election results. To better address the reporting responsibilities of the ANC Candidate during the 2016 Election Cycle, the Office of Campaign Finance revised the OCF 2016 Schedule of Training Seminars to offer comprehensive training dedicated solely to the ANC Candidate. The ANC candidates in all eight (8) Wards of the District of Columbia were invited. The Seminars titled “Understanding the Rules of the Game: A Campaign Finance Playbook for Advisory Neighborhood Commission (ANC) Candidates” were held on September 15, 2016, and October 6, 13, and 20th, 2016 in the Office of Campaign Finance. The 2016 Schedule of Training Seminars (Revised) was published at the OCF Website on September 9, 2016. A total of 59 ANC candidates participated in the training sessions, and received a Certificate of Completion.

To further assist the ANC Candidate, the Office of Campaign Finance developed and introduced online on September 29, 2016, the narrated training module, “Understanding the Rules of the Game: A Campaign Finance Playbook for Advisory Neighborhood Commission (ANC) Candidates”. The module was designed to familiarize the user with the reporting requirements for the ANC candidacy. ANC candidates were notified by email blast of the availability of the tutorial and the login codes for access at the OCF Website. Thirty-four (34) individuals completed the ANC Tutorial. As of this date, 333 of the 469 required filers of the ANC Summary Financial Statement have filed the Statement, which was due on January 17, 2017.

In addition, the Agency is utilizing the Webinar as a training tool to address the reporting requirements of the Campaign Finance Act. As of this date, the Office of Campaign Finance has held three (3) Webinars on October 21, 2016, November 15, 2016, and on January 17, 2017. At the end of the Webinar presentation, the public is invited to ask questions.

Second, the Office of Campaign Finance established a “Twitter” Account on April 25, 2016 to expand the Agency’s Social Media presence. The Twitter Account has increased the ability of the Agency to release information and respond immediately to inquiries from the public.

Third, the Agency, consistent with the provisions of the “Campaign Finance Reform and Transparency Amendment Act of 2015”, made applicable January 31, 2015, continued to manage the Mandatory Training Program, introduced in February 2015, for new candidates and the treasurer of each newly organized political committee, political action committee, independent expenditure committee, and the Constituent Service and Statehood Fund Programs. The Program is designed to ensure compliance with the contribution limits, the prohibitions, and the reporting requirements of the Campaign Finance Act. The conferences were coordinated by the Office of the General Counsel at the registration of the entity, and supported by the Audit and Public Information Divisions. At the conclusion of the training, each participant was required to swear or affirm to follow the Campaign Finance Laws, and a Certification of Attendance issued. During FY 16, the OCF achieved 100% compliance with the legislative mandate for newly registered candidates and the treasurers of newly organized committees to attend the training. The Agency issued Certificates of Attendance to each of the eighty (80) candidates and treasurers who registered during FY 16, and swore or affirmed to follow the Campaign Finance Laws. The names of the participants were posted at the OCF Web Site and included in the monthly production statistics of the Agency presented to the Board of Elections.

The 100% compliance rate assured the residents of the District of Columbia that the filing community has participated in, and received training to specifically address their obligations and duties under the Campaign Finance laws, and made a commitment to comply with those laws. The 100% compliance rate also promotes voluntary compliance with the Campaign Finance Laws as demonstrated through the 100% compliance rate achieved for the filing of Reports of Receipts and Expenditures by newly registered candidates and treasurers who attended the mandatory training.

To evaluate the effectiveness of the educational seminars, including the mandatory training sessions, the OCF circulates surveys at the conclusion of each session to determine whether the presentations achieved acceptable satisfaction ratings. Of 125 completed user surveys, the participants overwhelmingly responded favorably to the Public Training Sessions. A total of 102 respondents rated the seminars as informative with relative topics; 112 respondents rated the facilitators as “Excellent” in the area Knowledge of Information and Clear Presentation; 93 respondents rated as “Excellent” the training content; and 100 respondents rated the facilitator “Excellent” in providing useful examples.

During FY 16, the Office of Campaign Finance achieved a 100% compliance rate with the legislative mandate to file all financial reports online at the OCF Website. 642 of the 642 total reports received during FY 16 were filed electronically. The submission of financial reports online provides the public with real time access to the financial transactions reported by candidates, committees, and the Constituent Service and Statehood Fund Programs. The OCF fully utilized its Educational Training Program, Website, Social Media Platforms, and Filer Pre-Notification Program to reinforce to the filing community the legislative mandate to submit all financial reports online with the OCF, unless actual hardship in complying is demonstrated.

The FY16 Budget provided ample funding for the enhancements to the OCF Website and E-Filing System, and for the audit and enforcement responsibilities required by these programs through the increased staffing levels in both the Legal and Audit Divisions.

II.FY17 Programs

First, the Agency enhanced the OCF E-Filing System to enable committees and Constituent Service Programs to use the Excel Application Software to file their respective Reports of Receipts and Expenditures. The Excel Upload Module was moved to production on November 7, 2016. This feature allows the filer of financial reports (OCF Forms 10 and 16) to import contribution (Schedule A) and expenditure (Schedule B) records from pre-defined Excel template files. The filer may use the OCF formatted excel spreadsheet to enter the committee's information for Schedules A and B, and then upload the spreadsheet to automatically populate the Schedules. The first report available for the use of this function was the December 10, 2016 Filing Deadline for the Report of Receipts and Expenditures. Therefore, documented results of the use of this feature will not be realized until the end of FY 17.

Lastly, the Office of Campaign Finance will continue to monitor the viability of those Programs introduced during FY16 and the implementation of the mandatory online filing and training requirements of the Campaign Finance Reform Amendment Act of 2013".

4. How does the agency measure programmatic success? Please discuss any changes to outcomes measurement in FY16 and FY17, to date.

RESPONSE:

In general, the Agency measures the success of certain aspects of its Programs (Legal, Audit, Public Information) based upon the ability to complete/perform defined tasks within a time certain, established by the campaign finance laws or regulations, or the OCF Standard Operating Procedures. For example, the desk review of financial reports and the conduct of informal hearings must be completed before the next filing deadline; interpretative opinions must be issued within thirty (30) days of request; random audits must be completed within sixty days of initiation; financial reports must be made available for public review within 48 hours of receipt; and requests for expedited advice must be resolved within fifteen (15) days. In other areas, the success of a program may be based on the actual numbers of participants for a specific activity. Specifically, the measure for the success of the Mandatory Electronic Filing Program and the Mandatory Training Program has been based on the numbers of registrants with the Office of Campaign Finance who have complied with both Programs. Moreover, the decrease in the initiation of enforcement actions may be directly attributable to the success of these Programs and the personal accountability required of candidates and treasurers through the certification to follow and comply with the campaign finance laws. The achievement of these goals ensures the timely, accurate, and complete portrayal of campaign operations and the disclosure of financial records to the public upon which it can rely to make informed decisions in the election process.

During FY 16, the Office of Campaign Finance achieved a 100% compliance rate with the legislative mandate to file all financial reports online at the OCF Website. 642 of the 642 total reports received during FY 16 were filed electronically. The submission of financial reports online provides the public with real time access to the financial transactions reported by candidates, committees, and the Constituent Service and Statehood Fund Programs. The OCF fully utilized its Educational Training Program, Website, Social Media Platforms, and Filer Pre-Notification Program to reinforce to the filing community the legislative mandate to submit all financial reports online with the OCF, unless actual hardship in complying is demonstrated.

The Office of Campaign implemented the Mandatory Online Filing Program for all financial reports filed by candidates and committees registered with the Agency during FY15. The provisions of the “Campaign Finance Reform and Transparency Amendment Act of 2013”, made applicable January 31, 2015, mandate the online submission of all financial reports , unless actual hardship is demonstrated in complying with this requirement.

Section 3006 of Chapter 30, “Campaign Operations: Committees, Candidates, Constituent Service Programs, Statehood Funds”, of Title 3 (Elections and Ethics) of the District of Columbia Municipal Regulations (DCMR), prescribes the procedures which govern the mandatory electronic filing of financial reports, including the steps and timeframes that must be followed to request an exception to the electronic filing requirement; and clearly states that the paper filing of the Report of Receipts and Expenditures will be considered a failure to file.

In addition, the OCF achieved 100% compliance with the legislative mandate for newly registered candidates and the treasurers of newly organized committees to attend the training. The Agency issued Certificates of Attendance to each of the eighty (80) candidates and treasurers who registered during FY 16, and swore or affirmed to follow the Campaign Finance Laws. The names of the participants were posted at the OCF Web Site and included in the monthly production statistics of the Agency presented to the Board of Elections.

The Mandatory Training Program was also introduced in February 2015, for new candidates and the treasurer of each newly organized political committee, political action committee, independent expenditure committee, and the Constituent Service and Statehood Fund Programs, pursuant to the provisions of the “Campaign Finance Reform and Transparency Amendment Act of 2015”, made applicable January 31, 2015.

The 100% compliance rate assured the residents of the District of Columbia that the filing community has participated in, and received training to specifically address their obligations and duties under the Campaign Finance laws, and made a commitment to comply with those laws. The 100% compliance rate also promotes voluntary compliance with the Campaign Finance Laws as demonstrated through the 100% compliance rate achieved for the filing of Reports of Receipts and Expenditures by newly registered candidates and treasurers who attended the mandatory training.

Lastly, the Agency uses Surveys in its Educational Program to assess the content and performance of the trainer, and online surveys to evaluate the E-Filing System and the Website content and services. There have been no changes to the Performance Plan indicators in FY16 and FY17, to date.

5. Please list the task forces and organizations of which the agency is a member.

RESPONSE:

The Office of Campaign Finance is a Member of the Council on Government Ethics Laws (COGEL). COGEL is an organization of government ethics administrators who work in the fields of governmental ethics, freedom of information, elections, lobbying, and campaign finance. COGEL affords the opportunity to network with colleagues in these fields. Several

members of the OCF Staff are members of the International Association of Administrative Professionals (IAAP), which is dedicated to helping administrative professionals advance their careers through specialized training and other opportunities.

- 6. Please explain the impact on your agency of any legislation passed at the federal level during FY16 and FY17, to date, which significantly affected agency operations. If regulations are the shared responsibility of multiple agencies, please note.**

RESPONSE:

The Office of Campaign Finance is unaware of any legislation passed at the federal level during FY16 and FY17, to date, which would impact upon this Agency.

- 7. Please describe any steps the agency took in FY16 and FY17, to date, to improve the transparency of agency operations.**

RESPONSE:

During FY16, the Office of Campaign Finance initiated and completed several projects which were designed to make both the operations of the Agency and the data it collects more transparent.

First, The Office of Campaign Finance established a Twitter Account on April 25, 2016. The Twitter Account is used to disseminate information and to present data as it occurs in real time, and to engage the public. Through Twitter, the OCF has increased its transparency, audience, and ability to share information concerning the business of the Agency. The public is able to respond to the tweets with questions, comments or concerns and have them addressed immediately. Twitter is a social media broadcast platform that provides interactive engagement and dialogue. The Agency is also able to track and address areas of concern that might be trending. Twitter, similar to the OCF Facebook Page is a free social media site. It is an important tool that has enhanced OCF's transparency and increased the agency's social media outreach avenues. When needed, a link to the OCF's Facebook Page or Website is provided for additional information.

Second, the Office of Campaign Finance continued to place a strong organizational focus on achieving voluntary compliance through educational outreach. The Office of Campaign Finance conducted Mandatory Entrance Conferences for new candidates and the treasurer of each newly organized political committee, political action committee, independent expenditure committee, and the Constituent Service and Statehood Fund Programs. The OCF Mandatory Training Program is designed to ensure compliance with the contribution limits, the prohibitions, and the reporting requirements of the Campaign Finance Act. The conferences were coordinated by the Office of the General Counsel at the registration of the entity, and supported by the Audit and Public Information Divisions. At the conclusion of the training, each participant was required to swear or affirm to follow the Campaign Finance Laws, and a Certification of Attendance issued. The names of the participants were posted at the OCF Web Site and included in the monthly statistics of the Agency presented to the Board.

The on-site informal educational seminars were made available for candidates, political committees, and any other interested parties who participated in the 2016 Election Cycle. Training was also scheduled for the Treasurers of the Constituent Service and Statehood Fund Programs. The training sessions focused on educating the filing community about the reporting requirements of the Campaign Finance Act of 2011, as amended, and the OCF Electronic Filing and Disclosure System. The Seminars were held in the Office of Campaign Finance on a monthly basis, and commenced in January 2016 through December 2016.

The Notices of the 2016 Schedule of Training Seminars were published at the OCF Web Site and Face Book Page, and revised in September 2016, to include for the first time, training for candidates for the Office of Advisory Neighborhood Commission Member; distributed through the mailing of reminder letters to reporting entities; and posted in the Public Information Division of the Agency. Overall, the Office of Campaign Finance conducted twenty-nine Training Seminars and mandatory conferences, and issued 113 Certificates of Attendance to new candidates and treasurers.

Third, the Agency introduced several new upgrades and enhancements to the E-Filing and Disclosure System to further facilitate transparency by providing access to financial data in user friendly formats, and to fully implement the most recent changes in the Campaign Finance laws, mandated by the “Campaign Finance Reform and Transparency Amendment Act of 2013.

The public search modules developed in FY 2015, were moved to production on October 26, 2015. The OCF E- Filing and Disclosure System was enhanced to capture and offer “Quick Stats”, the “Active Committees List”, the Active Candidates List”, and the “Registrant Disclosure Search”. The “Quick Stats” option gives the public a quick view of various statistics maintained by the OCF specific to Principal Campaign Committees for the Filing Year selected, including the Total Contributions by Denomination, the Top 10 Principal Campaign Committees by Total Contributions Received, the Top 10 Principal Campaign Committees by Total Loans Received, and a list of the Recently Formed Principal Campaign Committees. Graphs are used to depict the percentage terms of the various statistics. The “Active Committees List” and the “Active Candidates List” provide the public with active lists based on the election year selected of Candidates with Committees and without Committees, and Committees by Filer Type (including principal campaign committees, political action committees, initiative, referendum, and recall committees, inaugural, legal defense, transition, exploratory and independent expenditure committees, and the Constituent Service and Statehood Fund Programs).

The Active Committees List displays for the filer type selected the totals reported for contributions, expenditures, and loans. The Active Candidates List displays for the Election Year selected the candidate name, committee name, election year, party, and office. The Registrant Disclosure Search offers a complete disclosure of the registration of a candidate/committee, the history of their filings in the Agency, and information related to enforcement actions, complaints or audit reports involving the registrant. To reach a greater audience, the OCF posted a link to the Quick Stats, the Active Lists of Candidates and Committees, and Registrant Disclosure Search at the Agency Face Book Page.

On February 19, 2016, the Agency introduced the newly revised Online Training Tutorials at the OCF Website to provide instruction for the successful electronic submission of financial reports.

In addition, during FY 16 and FY 17, the following upgrades and functionalities were developed and /or added:

- Excel Upload Module – Moved to Production November 7, 2016. This feature allows the filer of financial reports (OCF Forms 10 and 16) to import contribution (Schedule A) and expenditure (Schedule B) records from pre-defined Excel template files. The filer may use the OCF formatted excel spreadsheet to enter the committee's information for Schedules A and B, and then upload the spreadsheet to automatically populate the Schedules.
- Online Interactive Tutorial – Moved to Production June 22, 2016. This Tutorial presents training on the campaign finance laws, and provides the opportunity for the public to test their knowledge and understanding of the information presented through a series of factual patterns.
- Online ANC Training Module – Moved to Production September 29, 2016. This Training Module focuses on the reporting requirements under the campaign finance laws and regulations applicable to the ANC Candidate.
- Survey for the OCF Website and EFS Users – Moved to Production August 2016. This Online Survey gives the public and the users of the e-filing applications the opportunity to comment on the efficiency of the most recent upgrades to the OCF Website and E-filing System to improve overall performance.

Fourth, to further demystify the operations of the Agency and engage the public, the Office of Campaign Finance dispatched staff to visit the Early Voting Centers and to eighty-five (85) Election Precincts located throughout the 8 Wards during the June 2016 Primary Election and the November 8, 2016 General Election. The OCF staff visited the campaign offices of three (3) candidates active in the 2016 Election Cycle.

The visits afford the Agency the opportunity to observe the financial operations of registered entities, the activity around the perimeter of the Early Voting Centers and the Election Precincts to ensure compliance with the reporting requirements; to counsel individuals who may engage in activity which runs afoul of the Campaign Finance Laws; and to initiate enforcement actions where there is noncompliance. More importantly, the OCF staff is accessible to the public, available to respond to questions, and to assist the public in understanding their obligations under the Campaign Finance Act of 2011, as amended, and the role of the Office of Campaign Finance in administering the Act.

The OCF found at the Election Precincts that the markers were present for the placement of campaign literature, that the literature contained the appropriate disclaimer language, and that the campaign literature was properly posted outside the marked area. During the campaign office site visits, staff inquired about the mechanics of the campaign operations, and how the campaigns handled contributions and expenditures. The OCF staff was available to answer questions, and cautioned candidates concerning the proper disclaimer language for campaign literature.

The Office of the General Counsel continued to maintain the email address, ocf.gc@dc.gov, established in April 2013 through the Office of the Chief Technology Officer, from which the public may seek information concerning cases pending adjudication before the Agency. The language "Any inquiries regarding this Notice of Hearing should be sent to ocf.gc@dc.gov" is placed in the OGC "Notice of Hearing, Statements of Violations and Order of Appearance"

Form issued to notify Respondents of the scheduling of hearings on alleged violations of the Campaign Finance Act. The email address affords the public an additional vehicle through which to communicate with the OCF relative to legal and related matters, including the status of scheduled hearings, Orders of the Director, and Petitions for Enforcement before the Board of Elections; the identity of the hearing officer assigned to a particular matter; information on how to file a Motion for Reconsideration; and the balance due on a fine imposed.

During FY17, to date, the Agency presented on January 31, 2017 to the Mayor and the Council of the District of Columbia, and to the public, the OCF 2017 Biennial Report of Contributions and Expenditures, in an electronic format. The Report describes the receipts and expenditures of candidates for elective office, with the exception of ANC candidates, for the prior two year period, in dollar amount and percentage terms, by donor categories and the size of the donation, and expenditure type. Graphs are used to present the percentage terms. The receipts and expenditures of the political committees, political action committees, and independent expenditure committees are also summarized. For the first time, the January 2017 Biennial Report presents a listing and chart depicting the “Top Three Committees by Contributions Received” during the past two year period under Part I. Candidates and Principal Campaign Committees”, by office type; Part II, the Political Action Committees; Part III, Independent Expenditures; Part IV, Inaugural Committees; and Part V, Exploratory Committees.

The OCF Office of the General Counsel will create a database of advice issued concerning time-sensitive election related matters, numbered in chronological order and sorted by topic, for public search at the OCF Website. Because of time constraints, the requests for expedited advice are addressed within fifteen (15) days of receipt and are distinguished from requests for interpretative opinions. The creation of the database will provide an additional resource for the public relative to the application of the campaign finance laws, and a reference point for OCF to ensure the consistency of advice.

8. Please identify all electronic databases maintained by your agency, including the following:

- a. A detailed description of the information tracked within each system;**
- b. The age of the system and any discussion of substantial upgrades that have been made or are planned to the system; and**
- c. Whether the public can be granted access to all or part of each system.**

RESPONSE:

The response is attached. See **Attachment N**, the List of Electronic Databases.

- 9. Please provide a detailed description about any new technology acquired in FY16 and FY17, to date, including the cost, where it is used, and what it does. Please explain if there have been any issues with implementation.**

RESPONSE:

By way of background, during FY14, the Office of Campaign Finance upgraded and redesigned the OCF E-Filing and Disclosure System to use the latest Microsoft technologies (ASP.Net with MVC and SQL 2008 R2) and to conform to the specifications of the new Drupal Platform for the

District Government Website. The technology upgrade and User Interface upgrades were moved to production on March 4, 2015. The additional functionalities listed below were developed and/or added during FY15:

- Statement of Candidacy Online Registration and approval by OCF
- Statement of Organization Online Registration and approval by OCF
- Linking registrations with reports
- Automated email notifications for new registration, filing and approval by OCF
- Automated summary report creation (by denomination, by donor type, expenditures)
- Quick Stats
 - Total Contributions by Denomination
 - Total Contributions by Contributor Type
 - Top 10 Committees by Total Contributions
 - Top 10 Committees by Total Loans
 - Recently Formed Committees
- Active Candidates
- Active Committees

During FY 16 and FY 17, the following upgrades and functionalities were developed and /or added:

- Quick Stats – Moved to Production October 26, 2015
 - Total Contributions by Denomination
 - Total Contributions by Contributor Type
 - Top 10 Committees by Total Contributions
 - Top 10 Committees by Total Loans
 - Recently Formed Committees
- Active Candidates – Moved to Production October 26, 2015
- Active Committees - Moved to Production October 26, 2015
- Excel Upload Module – Moved to Production November 7, 2016
- Online Interactive Tutorial – Moved to Production June 22, 2016
- Online ANC Training Module – Moved to Production September 29, 2016
- Survey for the OCF Website and EFS Users – Moved to Production August 2016
- Capability added to the E-Filing System to allow the filing of consolidated reports for selected filers at the approval of the Audit Division – Moved to Production April 7, 2016
- “Schedule A4 – Transfers from Authorized Committees” implemented for the filer types below – Moved to Production January 29, 2016
 - Political Action Committee
 - Initiative
 - Referendum
 - Recall
 - Transition Committee
 - Inaugural Committee
 - Exploratory Committee
 - Independent Expenditure Committee
- Biennial Report Enhancement – Moved to Production January 31, 2017

The Biennial Report now includes a chart for top three committees by Contributions

The cost for the technology acquired was incurred during FY14 under PO498599-V2 - OCF E-Filing Redesign and Technology Upgrades (Total Cost: \$249,799.48); and the additional functionalities of the E-Filing and Disclosure System were included in the Contracts for OCF e-Filing System Enhancements approved during FY15, Total Cost: \$83,154.64; FY16, Total Cost: \$51,744.00; and FY17, to date, Total Cost: \$53,772.96.

10. Please describe how OCF currently uses social media to fulfill its mission.

RESPONSE:

The Office of Campaign Finance utilizes the agency's Facebook Page to increase its transparency and extend its outreach to the public. The goal of the social media tool is to provide the public and targeted groups with pertinent information in a timely manner. The Facebook posts include information relative to onsite Mandatory Training requirements, the schedule for onsite training seminars, filing dates, the release of Orders, Audits, the effective date of new legislation affecting the Campaign Finance Laws, the availability of financial reports for viewing and summary contributor and expenditure information, and job opportunities at the OCF. Visitors to the Agency's Website are able to click the Facebook Icon and access the Facebook Page. To date there have been 134 "likes" to the page since going live on January 16, 2014. "Likes" or engagements are those persons who visit the site, read a post, share information, click or comment on a message.

The Office of Campaign Finance established a Twitter Account on April 25, 2016. The Twitter Account is used to disseminate information and to present data as it occurs in real time, and to engage the public. Through Twitter, the OCF has increased its transparency, audience, and ability to share information concerning the business of the Agency. The public is able to respond to the tweets with questions, comments or concerns and have them addressed immediately. Twitter is a social media broadcast platform that provides interactive engagement and dialogue. The Agency is also able to track and address areas of concern that might be trending. Twitter, similar to the OCF Facebook Page is a free social media site. It is an important tool that has enhanced OCF's transparency and increased the agency's social media outreach avenues. When needed, a link to the OCF's Facebook Page or Website is provided for additional information.

11. Please explain the methods in which OCF informs the public about the conduct, activities, and financial operations of candidates, political committees, exploratory committees, transition, inaugural, legal defense committees, and constituent service and statehood fund programs?

RESPONSE:

The Office of Campaign Finance fully utilizes the Agency Website, the Facebook Page, the Twitter Account, the Email Subscription Service, the Biennial Reports, and the Monthly Production Statistics, to inform the public about the conduct, activities, and financial operations of the candidates, political committees, exploratory, transition, inaugural, and legal defense committees, and the Constituent Service and Statehood Fund Programs. The OCF Website offers

features and services designed to provide campaign finance data in user friendly and accessible formats, including the following:

(1) Data and Reports Link

- (a) Financial Reports – Real time images of the financial reports filed with the Agency generated by the E-Filing Application or through the data entry of paper submissions are available, from 2006 through the current reporting period, for public inspection, and may be searched by Filer Type, Filing Year, and Report Name; and Reports and Summaries of Contribution Information by Denomination and Donor Type and Expenditure Information by Type, with visuals (pie charts) to denote percentages, are generated by the OCF Database when financial reports are submitted, and made available for public inspection. The Reports and Summaries may be searched by Filer Type, Filing Year, and Report Name.
- (b) Contributions and Expenditures – This Search Feature provides access to all contributions and expenditures reported from 2003, through the current reporting period, and allows the public to use several different criteria to define the results required and search contribution data (i.e., the contributor’s name, recipient, report name, amount, date of contribution, contributor’s location, and contribution type), or expenditure data (i.e., the payor, the report name, the amount, the date, the payee, the payee location, and the expenditure type).
- (c) Registration Disclosures – This Search Feature allows the public to search the OCF Database to view the Electronic Disclosure of Registration Statements filed with the Agency by candidates/principal campaign committees, political action committees, Constituent Service Programs, and others. To define the results required, the user may select Filer Type, Election Year, and Committee Name. For example, the Filer Type “candidate” search result will display for the Election Year selected, the names of all candidates who have registered to participate in that election cycle, their Party Affiliation and the Office for which election is sought. The user may then select a specific candidate, to view the candidate’s Statement of Registration, Committee Statement of Organization, Filing History (i.e., Report Name and coverage period) And Enforcement/Complaints. The “Enforcement/Complaints” history is in development and requires the connection of the Informal Hearing Orders and the Audit Reports modules with the respective candidate/committee. Once completed, the Enforcement/ Complaints records (Orders and Audit Reports) for the selected candidate/committee in the Agency will be listed with the Docket Number, the Order Type, the Issuance Date, and Comments.
- (d) Biennial Reports – This Search Feature allows the public to search and select for public inspection the Biennial Reports of the Agency, by date, from which to view the summary of the receipts and expenditures of candidates for public office and committees for the prior two year period. The Biennial Reports provide a historical context of the money spent in DC Elections. For the coverage period selected, the contributions are sorted by denomination and donor type, and the expenditures by type, with graphs (pie charts) to visualize the percentages of the reported information.

- (e) Summary of Campaign Finance Reports – This Search Feature allows the public to select by calendar year and month, the Monthly Production Reports of the Office of Campaign Finance from which to view the activity of the Agency, including financial reports received, the names of committees who failed to file, new candidate and committee registrations, mandatory training conferences conducted, desk reviews conducted, audit reports, interpretative opinions, and informal hearing orders issued, the list of ongoing audits and investigations, fines issued, and petitions for enforcement filed before the Board of Elections. The Monthly Production Report of the Agency is presented at the open meetings held by the Board of Elections.
- (f) Affiliated Entity Search – This Search Feature allows the public to search contributions to identify contributions by a business entity, where the filer has listed all of the affiliated entities of the business contributor which have also contributed to the filer. The business contributor and its affiliated entities share the contribution limits imposed by the Campaign Finance Act. The user must select the criteria that best defines the results required (i.e., the recipient, the report name, the amount, the date, the contributor, the contribution location, and the contribution type).
- (g) Active Candidates List – This Search Feature provides the public with active lists based on the Election Year selected of Candidates with Committees and without Committees. The Active Candidates List displays for the Election Year selected the candidate name, committee name, election year, party, and office.
- (h) Active Committees List - This Search Feature provides the public with active lists of committees for the Election Year and Filer Type selected (includes principal campaign committees, political action committees, initiative, referendum, and recall committees, inaugural, legal defense, transition, exploratory and independent expenditure committees, and the Constituent Service and Statehood Fund Programs). The Active Committees List displays for the Filer Type and Election Year selected, the registration date of the committee, and the totals reported for contributions, expenditures, and loans.
- (i) Quick Stats – This Search Feature gives the public a quick view of various statistics maintained by the OCF specific to Principal Campaign Committees for the Filing Year selected, including the Total Contributions by Denomination, the Total Contributions by Contributor Type, the Top 10 Principal Campaign Committees by Total Contributions Received, the Top 10 Principal Campaign Committees by Total Loans Received, and a list of the Recently Formed Principal Campaign Committees with the organization date. Graphs are used to depict the percentage terms of the various statistics.

(2) Services Link

- (a) Contributions by Geography – This Service allows the public to search and view contributions by selection criteria for Election Year, Office, or Committee. The results provide the total contributions and of this amount, the contributions from the District of Columbia, for the office/ candidates/committee and election year selected, with a visual (pie chart) showing the percentage of contributions from the District of Columbia. A

map is used to display the totals broken down by Zip Code within the District of Columbia.

- (b) Download Campaign Finance Filer Data – This Service allows the public to download data obtained from financial reports electronically filed or entered from paper submissions into the OCF Database. The information may be searched, sorted, viewed, and exported from the database into different formats, including PDF, Excel, CSV or XML. The user can organize and analyze the data in greater detail.

The Office of Campaign Finance also uses the Website to disseminate News Releases, to announce upcoming filing deadlines for the submission of financial reports, and to publish Audit Reports, Investigative and Informal Hearing Orders, and the schedule of Educational Training, to which the public is invited. The Campaign Finance Guide and the Educational Brochures are also available for public view at the Website. The Guide summarizes the procedures and guidelines which govern the registration, financial reporting, and disclosure requirements of candidates, committees, and elected public officials in the District of Columbia. The Brochures offer critical information in a more concise fashion.

The Agency continues to use the OCF Facebook Page to further extend educational outreach to the public through the posting daily of upcoming training, filings, the release of orders and audits, and links to new features at the Website. Social website users are referred by the OCF Face Book Page to the Agency's Website for more detailed information where appropriate, and links are provided to aid in that process. An Icon is provided at the OCF Website to select and connect with the Page.

The Office of Campaign Finance established a Twitter Account on April 25, 2016. The Twitter Account is used to disseminate information and to present data as it occurs in real time, and to engage the public. Through Twitter, the OCF has increased its transparency, audience, and ability to share information concerning the business of the Agency. The public is able to respond to the tweets with questions, comments or concerns and have them addressed immediately. Twitter is a social media broadcast platform that provides interactive engagement and dialogue. The Agency is also able to track and address areas of concern that might be trending. Twitter, similar to the OCF Facebook Page is a free social media site. It is an important tool that has enhanced OCF's transparency and increased the agency's social media outreach avenues. When needed, a link to the OCF's Facebook Page or Website is provided for additional information.

The email subscription service invites members of the public to subscribe, indicating their preferences, to receive email updates on the issuance of final decisions in investigative cases, audit reports, and interpretative opinions. During FY 16, 280 new members of the public elected to use the service, and as of this date, in FY 17, there are 102 new subscribers (1262 total subscribers).

Lastly, the Office of Campaign Finance reports monthly to the Board of Elections during its regularly scheduled meetings on the activity of the Agency for the previous thirty (30) day period. The Agency Report details the financial reports received, the failures to file, the new candidate and committee registrations, the mandatory training conferences conducted, the number of desk reviews conducted, audit reports issued, the status of ongoing audits and investigations, the imposition of any fines, and the filing of any petitions for enforcement with the Board.

12. How has the agency made information relating to affiliated entities publicly accessible?

RESPONSE:

During FY16, the Agency introduced at the OCF Website, the Affiliated Entity Search, which may be found at the “Data and Reports” Link on the Home Page. This Search Feature allows the public to search contributions to identify contributions by a business entity, where the filer has listed all of the affiliated entities of the business contributor which have also contributed to the filer. The business contributor and its affiliated entities share the contribution limits imposed by the Campaign Finance Act. The user must select the criteria that best defines the results required (i.e., the recipient, the report name, the amount, the date, the contributor, the contribution location, and the contribution type). The database for this feature is dependent upon the reporting of affiliated entities on Schedule A (Contributions) of the Report of Receipts and Expenditures where the filer reports the receipt of contributions by a “Business Contributor” whose affiliated entities have also made a contribution to the same recipient.

By way of background, the provisions of D.C. Law 20-79, the “Campaign Finance Reform and Transparency Amendment Act of 2013”, made applicable on January 31, 2015, introduced more robust record keeping, reporting, and disclosure requirements. As the Committee has been previously advised, the enforcement of the contribution limits against business entities and their affiliates was problematic for the Agency prior to the most recent amendments to the Campaign Finance Act. Formerly, the term “person”, as defined by D.C. Official Code Section 1-1161.01 (42), to mean “an individual, partnership, committee, corporation, labor organization, and any other organization”, was identified in the Act as authorized to make contributions to political committees, campaigns to support candidates for office, to exploratory, inaugural, transition, and legal defense committees, and to the Constituent Service and Statehood Fund Programs. The attribution of contributions by partnerships was addressed in D.C. Official Code Section 1-1163.34, and traditionally, contributions by corporations were treated as separate from those of their individual owners. The treatment of a contribution by “any other organization”, which included limited liability companies, was unclear.

Under D.C. Law 20-79, the terms “affiliated entity”, “business contributor”, “control” or “controlling interest”, and “entity”, are defined collectively to mean that a business entity making a contribution and its affiliated entities as a “business contributor” share contribution limits. Of significance, the “business contributor” must disclose to a committee, when a contribution is made, the identities of the contributor’s affiliated entities that have also contributed to the committee, and certify for each contribution made that no affiliated entities have contributed an amount that when aggregated with the contribution would exceed the limits. The committee must then disclose on their financial reports the contribution by the business contributor and the identity of each of its affiliated entities that have also contributed to the committee. See D.C. Official Code Sections 1-1163.09, 1-1163.13, and 1-1163.33 and the business contributor must certify for each contribution made that no affiliated entities have contributed an amount that, when aggregated with the business contributor’s contribution, would exceed the limits (D.C. Official Code Section 1-1163.33 New par. (b)). These amendments as a whole where disclosure is made at the time of contribution, result in the transparency of the contributions received from business entities and their affiliated relationships on the face of the financial reports, and validate the legality of the contribution.

Since the applicability date of the provision requiring shared contribution limits between a business contributor and its affiliated entities, the contributions from business donors for the period February 1, 2015 through December 31, 2016 to Principal Campaign Committees totaled \$1,121,037.76 and 2388 contributors, compared to the total contributions received for the period January 1, 2013 through December 31, 2014 in the sum of \$4,522,102.10 from 4086 business donors. For these same periods the contributions from individuals to Principal Campaign Committees from February 1, 2015 through December 31, 2016 totaled \$2,966,660.55 and 14,887 contributors; and the contributions received for the period January 1, 2013 through December 31, 2014 were in the total sum of \$9,804,331.52 from 37,775 individual donors.

The contributions from business donors for the period February 1, 2015 through December 31, 2016 to Political Action Committees totaled \$747,726.67 and 378 contributors, compared to the total contributions received for the period January 1, 2013 through December 31, 2014 in the sum of \$1,837,162.24 from 609 business donors. For these same periods the contributions from individuals to Political Action Committees from February 1, 2015 through December 31, 2016 totaled \$777,951.91 and 6510 contributors; and the contributions received for the period January 1, 2013 through December 31, 2014 were in the total sum of \$424,443.30 from 5132 individual donors. Overall, the affiliated entities of business contributors were listed in twenty-seven instances.

The Office of Campaign Finance will intensify its efforts during FY17 to promote compliance with the “Business Contributor” Rule. The Agency will expand its Educational Program to extend its outreach efforts to the Business Community and notify various associations of the availability of the Agency to present seminars concerning the “business contributor” disclosure requirement. The reporting requirements of contributions received from business contributors will be reinforced to the filing community through the mandatory entrance conferences, the onsite educational seminars, the Pre-Notification and Request for Additional Information Programs, and the OCF Website. It is imperative that the filing community understands the responsibility of the business entity to provide the committee at the time a contribution is tendered with the identity of each of its affiliated entities which have also contributed to the committee, and a certification that for each contribution made, none of its affiliated entities have made a contribution that when aggregated with its contribution, exceeds the contribution limits; and the responsibility of the committee to collect and disclose the information on its reports of receipts and expenditures. The Office of Campaign Finance will consider the modification of the E-Filing Applications to provide a pop-up at the entry of “Business Contributor” data to remind the filer that the “Business Contributor” and its affiliated entities share the contribution limits, and to list each affiliated entity that has contributed to the same candidate/committee.

Lastly, the Office of Campaign Finance following each filing deadline, commencing with the January 31st, 2017, will random sample the reported contributions of at least 100 “Business Contributors” to verify that the contribution does not exceed the contribution limitation.

13. Please describe OCF's enforcement measures and actions taken in FY16 and FY17, to date.

RESPONSE:

In general, the Office of Campaign Finance employs the informal hearings process as the initial stage of enforcement of the campaign finance laws when there is non-compliance. In the event that the matter is not resolved through the informal hearings process, pursuant to 3 DCMR § 3711.9, the OCF may file a Petition for Enforcement with the Board of Elections (BOE). If the matter remains unresolved after a Pre-Hearing Conference and a contested hearing before the Board, the General Counsel for the Board may seek a judgment against the respondent in the Superior Court for the District of Columbia which sustains the petition.

More specifically, during FY16, the Office of Campaign Finance, through its Office of the General Counsel (OGC), continued to pursue the enforcement of reporting deficiencies, stemming from filing deadlines commencing with the October 1, 2015 deadline (Reports of Receipts and Expenditures due from the Constituent Service and Statehood Fund Programs), through the informal hearing process. Enforcement actions serve as a deterrent to would be violators, and promote compliance by demonstrating to the regulated community that violations can result in the imposition of civil penalties.

The Agency issued 197 Notices of Hearings (includes 138 initial and 59 second hearing notices), many with a proviso to the affected non-filer to comply with the reporting requirement by a time certain, or to submit a notarized affidavit in support of the alleged inaction. For the most part, the Notices of Hearing resulted in the submission of the requisite reports, or affidavits in explanation of the failure to timely file. The Office of the General Counsel actually conducted 47 informal hearings; issued 113 Orders of the Director; completed one (1) investigation; recommended the issuance of two (2) Interpretative Opinions; and responded to at least seventeen (17) Requests for Advice by email within 24 hours of the request from members of the public emanating from the 2016 Election Cycle.

On the statutory deadlines during FY16, the Public Information and Records Management Division (the "PIRM") referred ninety (90) (65 PCCs and 23 PACs) committees for the failure to file or timely file the Report of Receipts and Expenditures, due either October 10th, December 10th, January 31st, March 10th, June 10th, July 31st, or August 10th and two (2) Programs (2 CSP's) for the failure to file their financial reports due either October 1st, January 1st, April 1st, or July 1st.

In addition, the Reports Analysis and Audit Division (the "RAAD") referred twenty-five (25) reporting entities to the Office of the General Counsel for failure to comply with Requests for Additional Information issued by the Audit Division. The RAAD withdrew four (4) referrals upon compliance with the Audit Request, and the OGC scheduled the remaining matters for informal hearings.

One hundred and thirteen (113) Orders were issued, which included (104) failures to timely file financial reports, (5) failures to respond to audit requests for information, and (4) Motions for Reconsideration. Forty-four (44) of these Orders imposed fines, and the remaining sixty-nine

(69) cases were either dismissed, withdrawn, or the imposition of a fine suspended based upon the record before the Hearing Officer.

In those cases where fines were imposed, the fines were paid in full in five (5) matters, and were settled for reduced fines in nine (9) cases. Where fines were not paid within the period provided by the Order of the Director, the Office of Campaign Finance initiated enforcement proceedings before the Board of Elections to pursue the collection of outstanding fines. The Office of Campaign Finance filed a total of forty (40) (30 cases where fines were imposed in FY 16, and 10 cases where fines were imposed in FY 15) Petitions for Enforcement before the Board on November 9, 2015 and July 15, 2016. Of the 40 cases referred, three (3) cases were withdrawn, seven (7) cases were settled for reduced fines, eighteen (18) matters were certified by the Board for the initiation of enforcement actions in the Superior Court, and twelve (12) cases remain pending further action before the Board.

Because of the demonstrated ability of the Agency to consistently monitor and enforce the reporting requirements, a high level of compliance with the reporting deadlines has been maintained in general for all programs administered. In most instances, irregularities were resolved before the next filing deadline in accordance with the OCF Standard Operating Procedures. During FY 2016, a 100 % filing rate was achieved in the Constituent Service and Statehood Fund Programs; and a 94% filing rate was achieved in campaign finance disclosure based on the actual filings by principal campaign committees, political committees, and political action committees.

More specifically, 61 of the 61 required filers in the Constituent Service and Statehood Fund Programs filed the Report of Receipts and Expenditures (OCF Forms 10 and 28) for their respective Programs; and 582 of the required 616 principal campaign committees and political action committees filed the Report of Receipts and Expenditures (OCF Form 16).

There were 677 required filers in all of the Campaign Finance Programs: 590 timely filers; 52 late filers; and approximately 35 filers who remain delinquent. The total number of actual filers represents 95% (94% in FY15) of the total required filers who complied with the reporting requirements during Fiscal Year 2016.

During FY17, to date, the Office of the General Counsel has conducted 27 informal hearings to address the failure to file or timely file financial reports, or the failure to respond to Requests for Additional Information; coordinated four (4) training conferences and participated in one (1) Mandatory Training Conference; filed 14 Petitions for the Enforcement of Orders imposing Fines before the Board of Elections; and recommended the issuance of seven (7) expedited responses to requests for advice.

Overall, during FY16 and FY17, to date, the Agency issued 59 Orders imposing fines in the total sum of \$86,275.00; collected fines in the total sum of \$16,375.00; vacated or reduced fines in the total sum of \$41,250.00 upon the disposition of motions for reconsideration; and has outstanding fines due to the Agency in the total sum of \$28,650.00 for which petitions for enforcement were filed before the Board of Elections.

14. Please provide the Committee with the total amount of audits your office performed in FY16 and FY17. Additionally, please classify and sort these audits by classes such as random, reported, requested, etc.

RESPONSE:

The Reports Analysis and Audit Division completed thirty-two (32) audits in total for Fiscal Year 2016 and Fiscal Year 2017 to date of which twenty-five (25) were random periodic audits, six (6) were full field audits, and one (1) was an investigative audit. The Office of Campaign Finance issued thirty-two (32) Audit Reports and has two (2) ongoing Audits.

Random Audits Conducted

Date Audit Issued

Political Action Committees

Fresh PAC	November 23, 2015
The Libertarian Party of the DC	November 30, 2015
ABC Metro PAC	March 4, 2016
Higher Ground PAC	March 14, 2016
Local 25 General Political PAC	April 5, 2016
Lawyers for a Better Government PAC	August 31, 2016
DC PAC	August 31, 2016
DC Building Industry PAC	September 6, 2016
Professional Insurance Agents PAC	September 12, 2016

Constituent Service Programs

Yvette Alexander CSF	March 16, 2016
Our Ward 5	April 21, 2016
Phil's Fund for Citizen Services	April 28, 2016
Citizens Outreach Fund CSF	December 17, 2015
Mary Cheh Ward 3 CSF	November 3, 2016
Evans Constituent Services Fund	November 8, 2016
Office of LaRuby May CSF	November 30, 2016

Continuing Committees

Eric Jones 2014 PCC	November 23, 2015
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Candidates in the 2015 Election Cycle

Barry for Council PCC	November 10, 2015
Eric Jones 2015	November 23, 2015

Candidates in the 2016 Election Cycle

Trayon White Ward 8	August 29, 2016
Potillo for Council 2016	September 6, 2016
Klokel At-Large	September 8, 2016
Robert White At-Large 2016	September 21, 2016
Committee to Elect Jaclyn Smith 2016	September 21, 2016
Friends of Jimmy Calomiris	October 25, 2016

Full Field Audits

Charles Allen for Ward 6	November 20, 2015
DC Proud Inaugural Committee	December 14, 2015
Brianne for DC	October 25, 2016
Elissa 2014	April 25, 2016
Grosso At-Large	June 17, 2016
LaRuby May for Ward 8	September 30, 2016

Investigative Audits

Gray for Mayor	January 29, 2016
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As reported previously, the Records Analysis and Audit Branch (RAAD) is responsible for performing audit analysis and reviews of all financial reports and documents received in the Agency. The Division conducts full field audits of the entire operations of the principal campaign committees of newly elected public officials from the organization of the committee to its termination. RAAD may also initiate full field audits and investigations based upon deficiencies and conditions noted during Desk Audit Reviews; upon complaints filed by members of the public; and upon order of the Board of Elections or the OCF Director. The Division conducts periodic random field audits in each OCF Program, including random audits of the financial reports submitted by candidates, principal campaign committees, political committees, political action committees, independent expenditure committees, and Constituent Service and Statehood Fund Programs. The periodic audits require reporting entities to submit all banking records and statements, invoices, and receipts maintained in support of the contributions and expenditures reported in the coverage period of the selected filing. This enables the Audit Division to verify report entries against the supporting documentation.

During Fiscal Year 2016, the Office of Campaign Finance conducted 727 (includes Amended Reports) Desk Reviews of all Reports of Receipts and Expenditures filed with the Agency by candidates, committees, and the Constituent Service and Statehood Fund Programs. All Desk Reviews were completed before the next reporting period of the respective entity.

The Desk Reviews ensure that the public record provides a full and accurate portrayal of the financial operations and activities of campaigns, and the Constituent Service and Statehood Fund Programs. The Desk Reviews resulted in the issuance of 174 Requests for Additional Information directed to reporting entities to advise of deficiencies, and to extend the opportunity for compliance with the requirements of the Campaign Finance Act. Ninety-one (91) reporting entities complied with the request of the Audit Division, and submitted the necessary information. Sixty-six (66) responses were due in FY 2017, and the information has been

received. The Audit Division referred twenty-five (25) cases (withdrew four (4) cases where there was subsequent compliance) to the Office of the General Counsel for enforcement where there was a failure to respond to the request for additional information. RAAD assisted in the termination of thirty-seven (37) committees, following the review and approval of their Final Report of Receipts and Expenditures.

During FY 17, the Audit Division revised the Standard Operating Procedures for the Division to provide for the Desk Review of the ANC Summary Financial Statement (OCF Form 18). The Summary Financial Statement of the Candidate for the Office of Member of an ANC must include the total receipts and expenditures relative to seeking election to the ANC Office; the cash on hand at the close of the reporting period; the total amount of debts and obligations owed to and owed by the ANC candidate; the method of disposal of surplus funds; certification that the ANC candidate did not receive contributions from any person excluding the candidate, in excess of twenty-five (\$25) dollars; or a certification that the ANC candidate did not receive contributions from any person or make expenditures, including from or by the candidate, to support the election to the ANC Office. The deadline for the filing of the ANC Summary Financial Statement was January 17, 2017. As of this date, the Audit Division has conducted the desk review of 266 Summary Financial Statements of ANC Candidates.

Lastly, it should be noted the work load of the Audit Division will increase during this calendar year due to the quarterly reporting required by political action committees and independent expenditure committees established by D.C. Act 21-0584, the “Campaign Finance Reform and Transparency Emergency Amendment Act of 2016”, effective December 24, 2016. The Act expires on March 24, 2017. Specifically, the reporting cycles for political action committees and independent expenditure committees during nonelection years are increased from two (2) report dates, the January 31st and the July 31st Filing Deadlines, to include the 10th days of April and October, and the current contribution limitation of \$5,000 is applied to political action committees during nonelection years. The Standard Operating Procedures of the Audit Division will be revised to include these report dates in the Desk Review Process.

15. How many committees are currently registered with OCF? Please break this number down by filer type. How many committees registered in FY16 and FY17, to date, by filer type?

RESPONSE:

There are currently 147 committees and 12 Programs registered with the Office of Campaign Finance. The following list reports the number of committees currently registered with the Office of Campaign Finance by filer type, and includes the registration numbers of each type for FY 16 and FY 17, to date.

Committee Type	Total	FY 2016	FY 2017
PCC	72	42	2
PAC	61	3	0
Initiative	4	3	1
Referendum	0	0	0
Recall	2	1	1
Inaugural	0		
Independent Expenditure	7	5	1
Exploratory	1	0	0
Senators and Representatives	3	0	0
Constituent Service Program	9	0	1

16. How much did OCF impose in fines in FY16 and FY17, to date? Of this amount, how much has been collected, and how much is outstanding?

RESPONSE:

Overall, during FY16 and FY17, to date, the Office of Campaign Finance issued 59 Orders imposing fines in the total sum of \$86,275.00; collected fines in the total sum of \$16,375.00; vacated or reduced fines in the total sum of \$41,250.00 upon the disposition of motions for reconsideration; and has outstanding fines due to the Agency in the total sum of \$28,650.00 for which petitions for enforcement were filed before the Board of Elections.

17. How many principal campaign committees are currently open for the purpose of retiring debt? How long has each committee been open, and what is the outstanding balance in each account?

RESPONSE:

The List of Principal Campaign Committees which are open for the purpose of retiring debt is attached as **Attachment O**.

LIST OF OCF ATTACHMENTS

FEBRUARY 15, 2017

RESPONSES TO QUESTIONS OF THE COMMITTEE ON THE JUDICIARY & PUBLIC SAFETY

COUNCIL OF THE DISTRICT OF COLUMBIA

ATTACHMENT A – February 2017 Office of Campaign Finance Organizational Structure and Staffing Chart
(Response to Question No. 1, General Questions)

ATTACHMENT B – February 2017 Organizational Charts for each OCF Division (Response to Question No. 1, General Questions)

ATTACHMENT C– Office of Campaign Finance Functional Organization Chart (Response to Question No.1, General Questions)

ATTACHMENT D – February 2017 Schedule A for the Office of Campaign Finance (Response to Question No. 2, General Questions)

ATTACHMENT E – Chart of FY16 and FY17, to date, Intra-District Transfers and Memoranda of Understanding (Response to Questions No. 6 and 9, General Questions)

ATTACHMENT F – List of OCF Purchase Card Spending for FY16 and FY17, to date (Response to Question No.8, General Questions)

ATTACHMENT G – Chart of FY16 and FY17, to date, Reprogramming (Response to Question No. 13, General Questions)

ATTACHMENT H - FY16 Performance Plan and Report for the Office of Campaign Finance (Response to Question No. 20, General Questions)

ATTACHMENT I - FY17 Performance Plan for the Office of Campaign Finance (Response to Question No. 21, General Questions)

ATTACHMENT J – Copy of Correspondence dated January 31, 2017 to the Honorable Charles Allen, Member of the Council from Ward 6 (Response to Question No. 23, General Questions)

ATTACHMENT K – OCF Research Report dated June 7, 2016 (Response to Question No. 23, General Questions)

ATTACHMENT L– List of OCF Employees whose salary exceeded \$100,000 or more in FY16 and FY17, to date (Response to Question No. 24, General Questions)

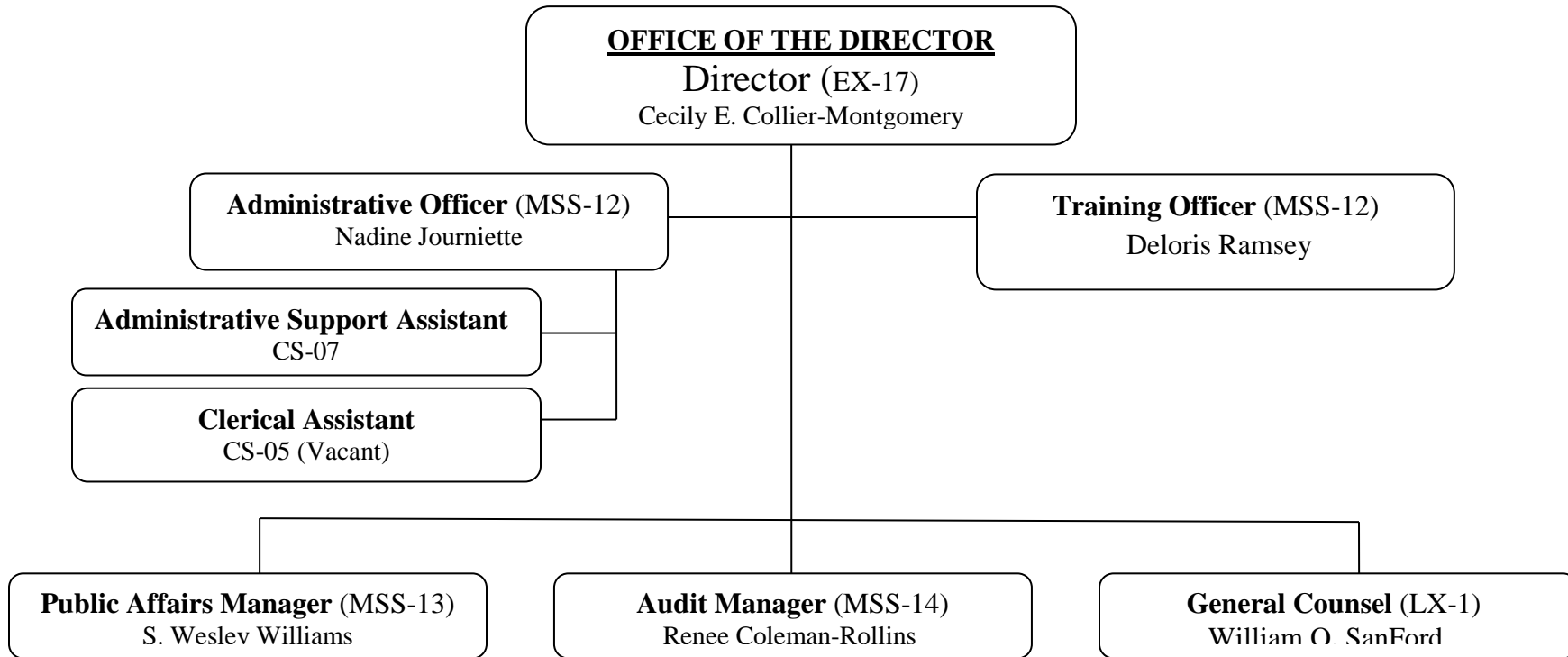
ATTACHMENT M – List of OCF Contracts for FY16 and FY17, to date (Response to Question No. 30, General Questions)

ATTACHMENT N- List of OCF Electronic Databases (Response to Question No. 8, Agency Operations)

ATTACHMENT O – List of Continuing Principal Campaign Committees with debt to retire (Response to Question No. 17, Agency Operations)

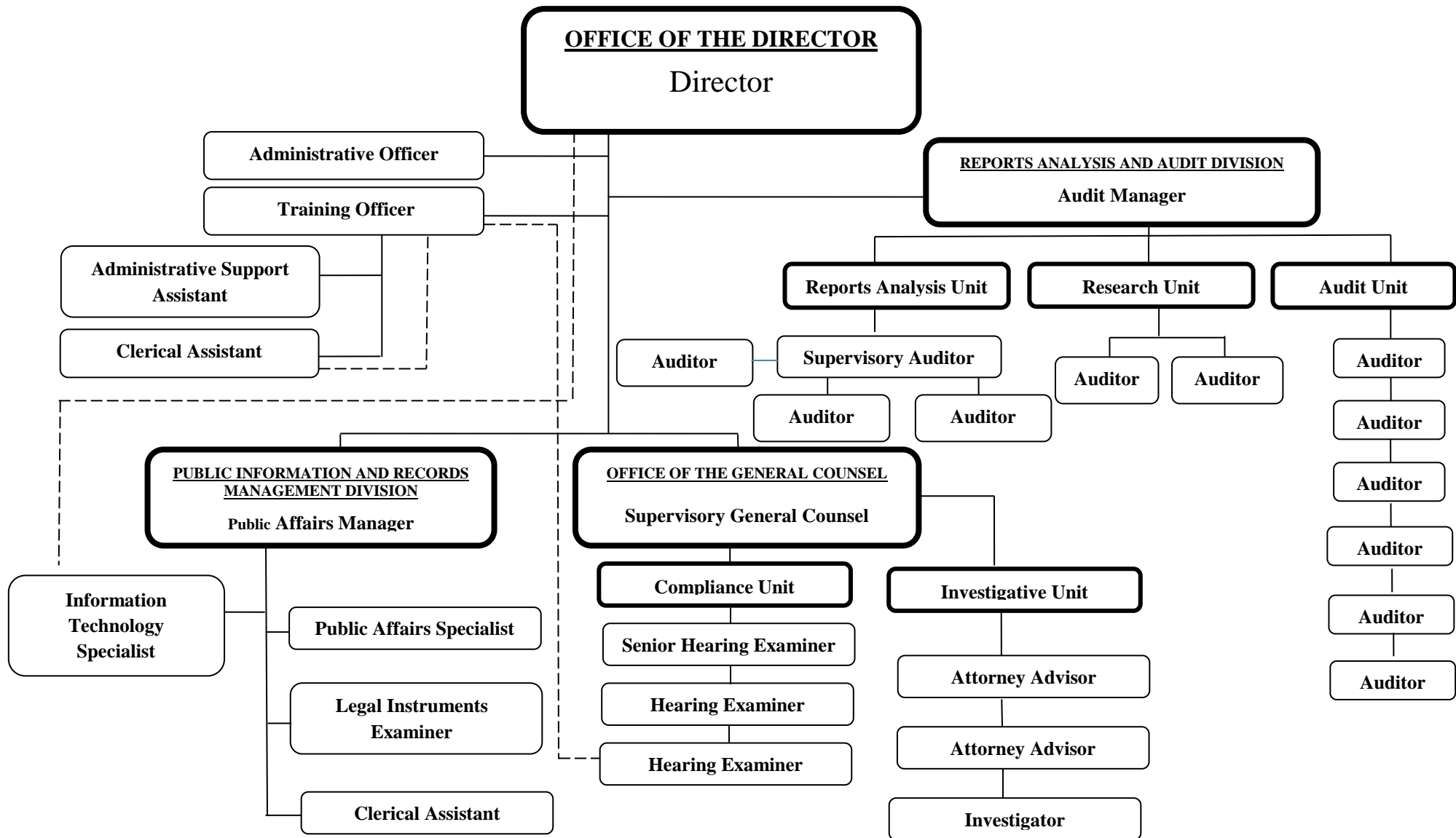
Office of the Director

5 Positions



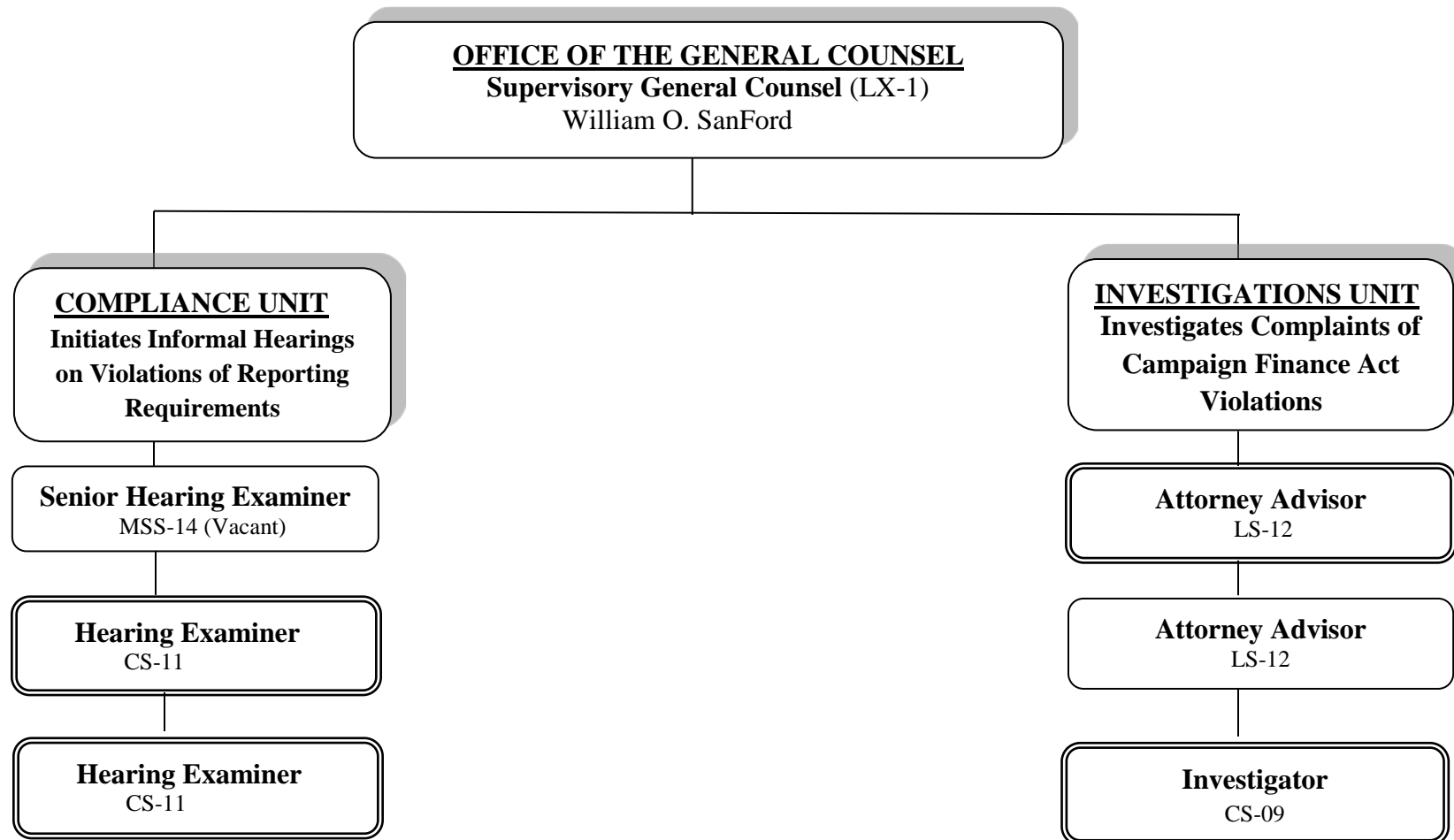
February 2017

Organizational Structure and Staffing Chart



Office of the General Counsel

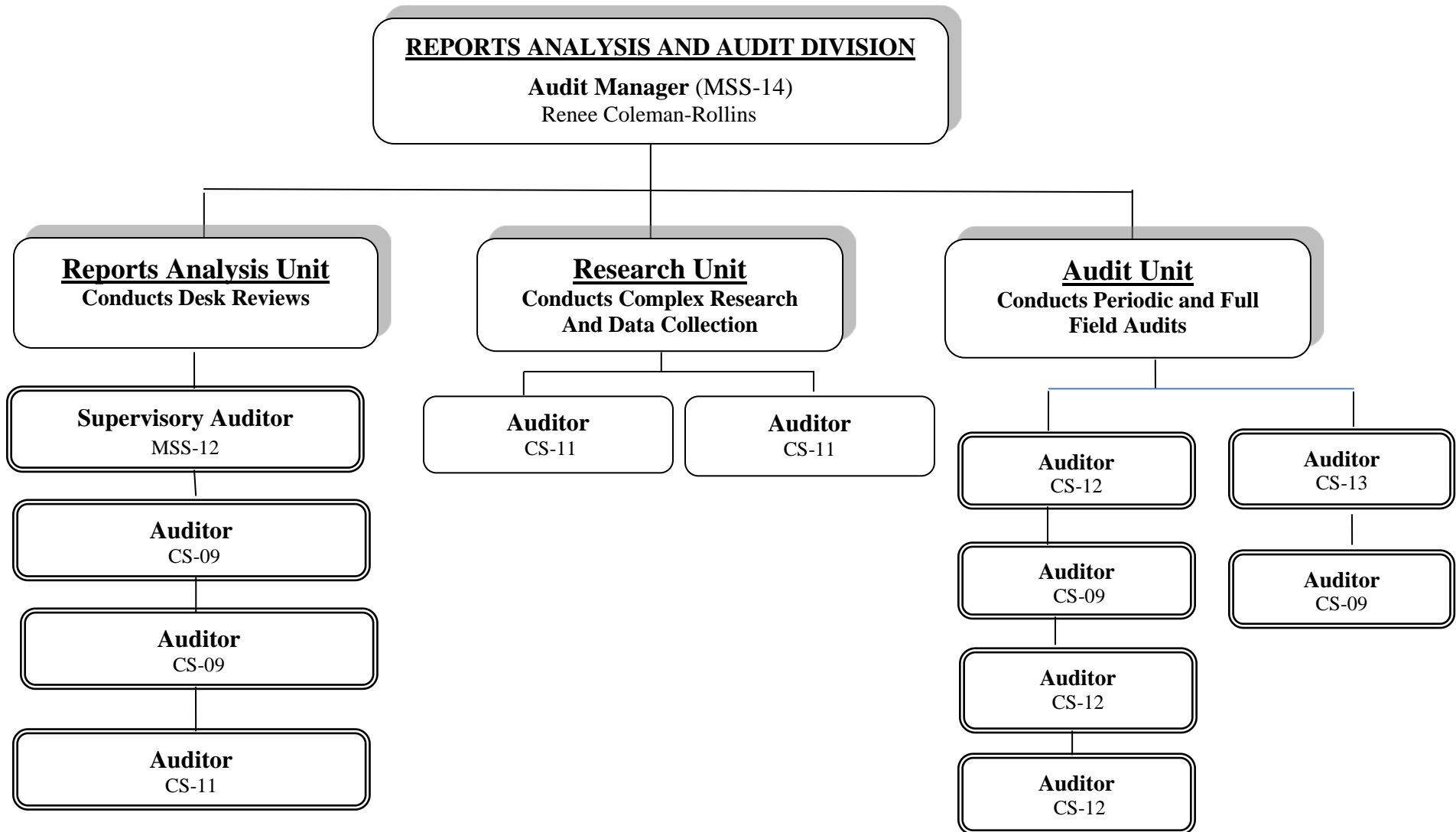
7 Positions



February 2017

(1 Vacant Position)

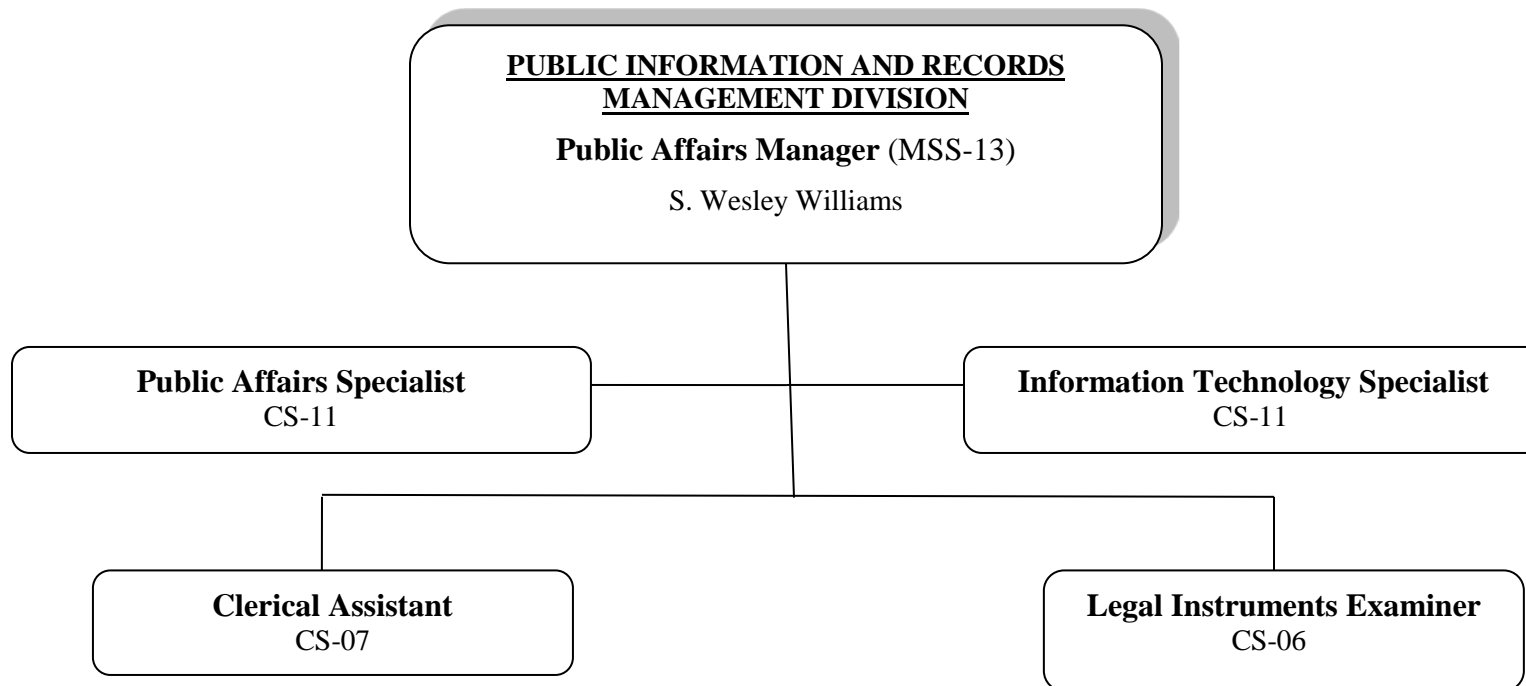
Reports Analysis and Audit Division



DC OFFICE OF CAMPAIGN FINANCE

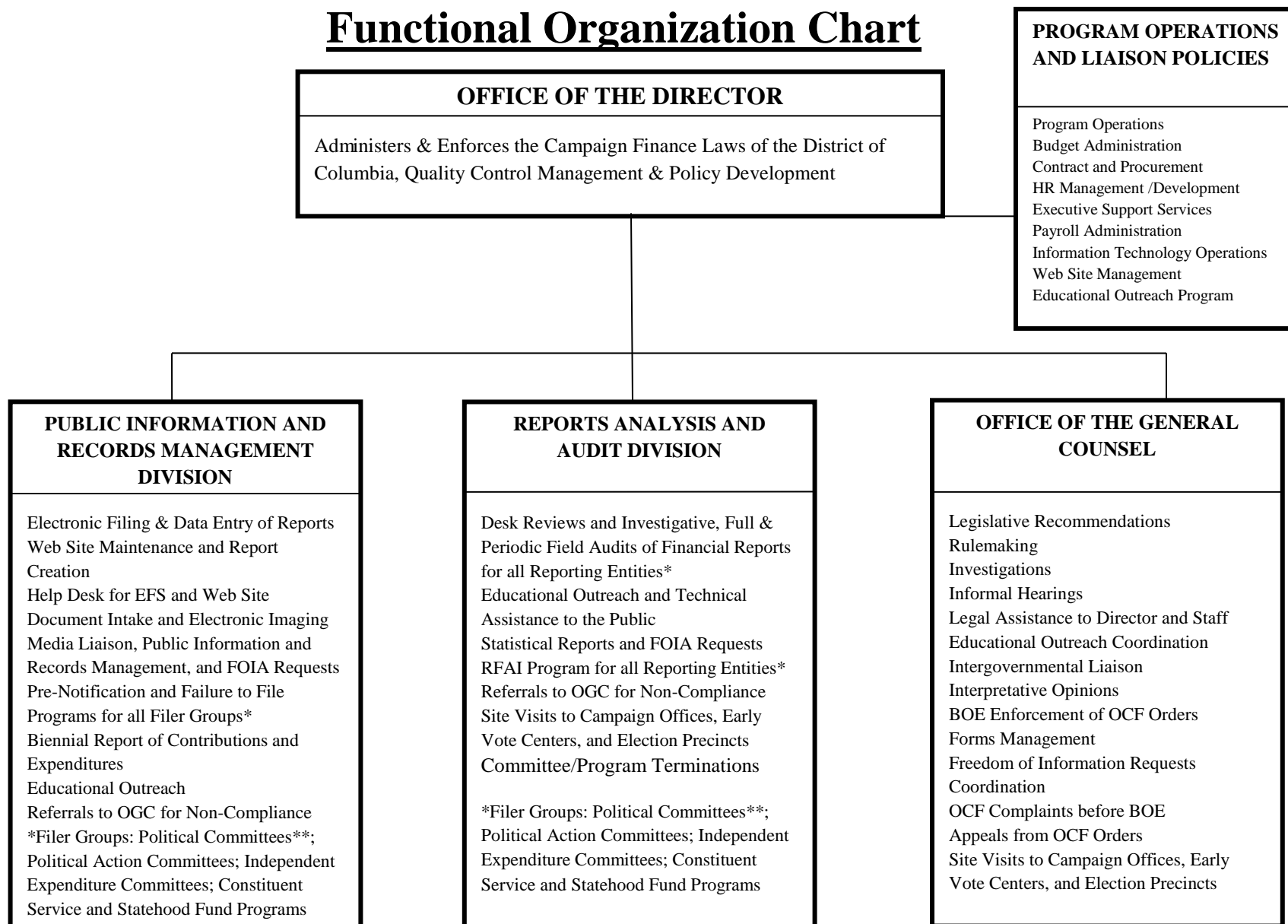
5 Positions

Public Information and Records Management Division



February 2017

DC OFFICE OF CAMPAIGN FINANCE
Functional Organization Chart



** - Political Committees include principal campaign committees; inaugural, transition, exploratory and legal defense committees; and ballot committees

February 2017

OCF RESPONSE TO QUESTION #2 (General Questions)

FY 17 CURRENT SCHEDULE A

Lists by Program and Activity of Positions by Title, Employee Name, Grade, Step, Series, Salary, Fringe Benefits, EOD, and Whether the position is vacant or Frozen

I. Agency Management Program

Title	Name	Grade	Step	Series	Salary	Fringe Benefits	EOD	Status Continuing /Term/ Temporary / Contract/ Vacant/ Frozen/	Recruitment/ Activity
Agency Management Program									
Office of The Director									
Director	Collier-Montgomery Cecily E.	17		0087	172,870.30	40,451.64	08/02/96	Continuing	
Training Officer	Ramsey, Deloris	MSS-12	0		84,704.92	19,820.95	08/12/13	Continuing	
Administrative Officer	Journiette, Nadine	MSS-12	0	341	75,356.19	17,633.35	01/28/13	Continuing	
Administrative Assistant	Williams, April L.	CS-07	06	303	45,848.00	10,728.43	05/17/04	Continuing	
Clerical Assistant		CS-05	02	303	31,823.00	7,446.58	Vacant	*Vacant as of 11/07/16 Position Number 00010999	Pending Reclassification /and Updating Position Description

*The Position (00010999) is vacant due to the employee Resignation, effective 11/07/16.

Lists by Program and Activity of Position Listings for Position, Name, Grade & Step, Series, Salary, Fringe Benefits, EOD, and Whether Position is Vacant or Frozen

II. Oversight Support Program

Office of General Counsel Activity									Recruitment Activity
Title	Employee	Grade	Step	Series	Salary	Fringe Benefits	EOD	Status Continuing/ Term/ Temporary/ Contract/ Vacant/ Frozen/	
Supv. General Counsel	SanFord, William O.	LX-1		905	131,537.00	30,779.66	10/02/10	Continuing	
Hearing Examiner		MSS-14		905	119,591.00	27,984.29	05/27/03	**Vacant as of 12/31/16 Position Number 00024372	Pending Reclassification /and Updating Position Description
Attorney Advisor	Muhammad, Leonard	LS-12	3	905	87,796.00	21,167.17	01/31/11	Continuing	
Hearing Examiner	Peete, Kalvaneeta	CS-11	3	905	62,333.00	15,013.44	01/14/13	Continuing	
Attorney Advisor	Franklin, Austin	LA-12	3	905	87,796.00	20,544.26	05/20/13	Continuing	
Investigator	Zeraat, Payam	CS-09	3	1810	51,709.00	12,099.91	01/28/13	Continuing	
Hearing Examiner	Fennell, Shaunda	CS-11	1	905	56,852.00	13,303.37	09/06/16	Continuing	

****The Position (0024372) is vacant due to the employee Retirement, effective 12/31/16**

Reports Analysis and Audit Division Activity									Recruitment Activity
Title	Employee	Grade	Step	Series	Salary	Fringe Benefits	EOD	Status Continuing/ Term/ Temporary/ Contract/ Vacant/ Frozen/	
Auditor Manager	Coleman, Renee	MSS-14		511	119,589.80	27,984.02	07/12/04	Continuing	
Supervisory Auditor	Gilliam Sr., Dwayne	MSS-12		511	78,785.62	18,435.84	09/13/04	Continuing	
Auditor	Banaro, Beruk	CS-09	01	511	48,693.00	11,394.16	12/28/15 /	Continuing	
Auditor	Jackson, Erick	CS-13	10	511	104,423.00	24,434.98	02/24/14	Continuing	
Auditor	Afoke, Olamide	CS-11	01	511	56,852.00	13,303.37	02/10/14	Continuing	
Auditor	Wales, Mark	CS-12	01	511	72,528.00	16,971.55	05/06/13	Continuing	
Auditor	Dufe, Eddie	CS-12	01	511	72,528.00	16,971.55	05/06/13	Continuing	
Auditor	Oliver Jr., Michael D.	CS-12	01	511	74,711.00	17,482.37	06/23/08	Continuing	
Auditor	Steele, Michele	CS-11	01	511	58,679.00	13,303.37	05/06/13	Continuing	
Auditor	Chavis, Zoe	CS-11	03	511	62,333.00	14,585.92	07/15/13	Continuing	
Auditor	Barare, Semiu	CS-09	1	511	48,693.00	11,394.16	12/28/15	Continuing	
Auditor	Smith, Montrel	CS-09	1	511	47,185.00	11,041.29	01/08/16	Continuing	

	Public Information and Records Management Division Activity								
Public Affairs Manager	Williams III, Sidney Wesley	MS-13		1035	99,658.18	23,320.01	05/12/08	Continuing	
Public Affairs Specialist	Lake, Sonya L.	CS-11	6	1035	67,814.00	15,868.48	01/18/09	Continuing	
Clerical Assistant	Scales, Billy L.	CS-7	9	301	49,919.00	11,681.05	06/30/97	Continuing	
Legal Instruments Examiner	McQueen, Laura	CS-6	7	950	43,857.00	10,262.54	01/12/04	Continuing	
Information Technology	Dua, Nimmi	CS-11	05	2210	64,160.00	15,013.44	08/31/98	Continuing	

*The Vacant Position Clerical Assistant (0010999), CS-05/02 occurred as the result of the Former Employee Resignation, effective 11/07/2016; and is pending Re-classification and the Updating of the Position Description with DCHR.

**The Hearing Examiner (0024372), MSS-14 Position, is vacant as of 12/31/16 due to the Retirement of the former employee. This position is with DCHR for Re-classification and updating Position Description.

OCF RESPONSE TO QUESTIONS #6 AND #9
GENERAL QUESTIONS

INTRA-DISTRICT/MOU FY 2016 Transfers From Office of Campaign Finance (CJ0)			
Amount	From	To	Description
\$ 5,183.46	CJ0	KT0	Fleet Services Effective Date 10/1/2016 Thru Sept 30, 2017
\$ 13,943.73	CJ0	TO0	Services Server/Data BaseEffective Date 10/1/2016 Thru Sept 30, 2017

INTRA-DISTRICT/MOU FY 2017 Transfers From Office of Campaign Finance (CJ0)			
Amount	From	To	Description
\$ 11,626.78	CJ0	KT0	Fleet Services Effective Date 10/1/2016 Thru Sept 30, 2017
\$ 15,544.29	CJ0	TO0	Services Server/Data BaseEffective Date 10/1/2016 Thru Sept 30, 2017
\$ 15,000.00	CJ0	BE0	HR Services Effective Date 10/1/2016 Thru Sept 30, 2017

OCF RESPONSE TO QUESTION #8 (GENERAL QUESTIONS)

OFFICE OF CAMPAIGN FINANCE FY 2016 & FY 2017 P-CARD TRANSACTIONS

FY 16 P-CARD PURCHASES

Vendor	Amount	General Purpose	Date	P-Card User
Metro Rail	\$126.00	Metro Smart Trip Cards	11/20/2015	April Williams
Al's Office Supplies	\$1,045.00	Office Supplies	02/04/2016	April Williams
Miller's Copying	1,083.00	Letterhead & Stationery	04/13/2016	April Williams
Metropolitan Office Products	\$442.04	Office Supplies	04/14/2016	April Williams
Cogel	\$445.00	Membership Dues	06/23/2016	April Williams
Haines	\$415.50		06/23/2016	April Williams
IAAP	\$141.00	Membership Dues	06/24/2016	April Williams
IAAP	\$141.00	Membership Dues	06/24/2016	April Williams
IAAP	\$141.00	Membership Dues	06/24/2016	April Williams
IAAP	\$141.00	Membership Dues	06/24/2016	April Williams
IAAP	\$532.00	Study Guide Books	06/24/2016	April Williams
DC Bar	\$50.00	Dc Bar Course(s)	07/11/2016	April Williams
DC Bar	\$99.00	Dc Bar Course(s)	07/11/2016	April Williams
DC Bar	\$99.00	Dc Bar Course(s)	07/11/2016	April Williams
DC Bar	\$109.00	Dc Bar Course(s)	07/11/2016	April Williams
DC Bar	\$128.00	Dc Bar Course(s)	07/11/2016	April Williams
DC Bar	\$358.00	Dc Bar Course(s)	07/11/2016	April Williams
District Legal Services	\$100.00	Process Server	07/26/2016	April Williams
Dell Computers	\$2,076.42	Warranty Upgrades	07/27/2016	April Williams
Metropolitan Office Products	\$728.42	Office Supplies	08/29/2016	April Williams
DC Bar	\$20.00	Dc Bar Course(s)	08/31/2016	April Williams
Adobe	\$1,099.00	Software Upgrade	09/01/2016	April Williams
Staples	\$140.27	Office Supplies	09/14/2016	April Williams
DC Bar	\$89.00	Dc Bar Course(s)	09/15/2016	April Williams

FY 17 P-CARD PURCHASES

Vendor	Amount	General Purpose	Date	P-Card User
Miller's Copying	\$200.00	CD Copies of Biennial Report	02/01/2017	April Williams

(GENERAL QUESTIONS)

Office of Campaign Finance (CJ0)

FY 2016 Reprogramming

From	Amount	TO	Amount	DESCRIPTION
0111	60,000.00	0201	5,000.00	Operational Cost within the agency
0147	14,000.00	0410	69,000.00	Effective Date 2/24/16
Total	74,000.00		74,000.00	

FY 2017 Reprogramming

From	Amount	TO	Amount	DESCRIPTION
0111	24,000.00	0410	30,000.00	Operational Cost within the agency
0147	6,000.00			Effective Date was Jan 25, 2017
Total	30,000.00		30,000.00	



Office of Campaign Finance (OCF) FY2016 Performance Accountability Report (PAR)

Introduction

The Performance Accountability Report (PAR) measures each agency's performance for the fiscal year against the agency's performance plan and includes major accomplishments, updates on initiatives' progress and key performance indicators (KPIs).

Mission

The mission of the Office of Campaign Finance (OCF) is to regulate and provide public disclosure and transparency to protect and 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. OCF also performs 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.

Overview – Agency Performance

The following section provides a summary of OCF performance in FY 2016 by listing OCF's top accomplishments, and a summary of its progress achieving its initiatives and progress on key performance indicators.

Top Agency Accomplishments

Accomplishment	Impact on Agency	Impact on Residents
Expanded the OCF Educational Program to introduce an interactive online training tutorial on the basics of the Campaign Finance Laws necessary to launch a successful campaign. The tutorial invites the user to test their knowledge and understanding of the information presented.	The Agency continues to explore the use of its Web Site to reach the broadest audience for public education, and increase voluntary compliance with the reporting requirements, contribution limitations, and prohibitions of the Campaign Finance Laws.	The Interactive Training Tutorial provides a further opportunity for the public to become familiar with and understand the laws of the District of Columbia which govern campaign operations in order to ensure their compliance with the reporting requirements, the contribution limitations, and the prohibitions of the laws.
Achieved 100% compliance with the legislative mandate for newly registered candidates and the treasurers of newly organized committees to attend training on their duties and responsibilities under the Campaign Finance Act. The Office of Campaign Finance issued Certificates of Attendance to each of the 80 candidates and treasurers who registered during FY2016 and swore or affirmed to follow the Campaign Finance Laws.	The 100% compliance rate promotes voluntary compliance with the Campaign Finance Laws as demonstrated through the 100% compliance rate achieved with the electronic filing program, and the overall 99% compliance rate achieved for the filing of Reports of Receipts and Expenditures by newly registered candidates and treasurers who attended the mandatory training.	The 100% compliance rate assures the residents of the District of Columbia that the filing community has participated in, and received training to specifically address their obligations under the Campaign Finance Laws, and made a commitment to comply with those laws.
Achieved a 100% compliance rate with the legislative mandate to file all financial reports online at the OCF Web Site. 642 of the 642 total reports received during FY2016 were filed electronically.	The 100% compliance rate with the electronic filing mandate eliminated the time consuming and tedious task for the Agency to manually data enter the financial transactions reported by paper submission.	The submission of financial reports online provides the public with real time access to the financial transactions reported by candidates, committees, and the Constituent Services and the Statehood Fund Programs.

In FY 2016, OCF had 6 Key Performance Indicators. Of those, 0 were neutral, and another 1 were not able to be reported by the end of the fiscal year. Of the remaining measures, 80% (4 KPIs) were met, 20% (1 KPIs) were nearly met, and 0% (0 KPIs) were unmet. In FY 2016, OCF had 8 Initiatives. Of those, 100% (8) were completed and 0% (0) were nearly completed, and 0% (0) were not completed. The next sections provide greater detail on the specific metrics and initiatives for OCF in FY 2016.

FY16 Objectives

Division	Objective
Agency Management	Obtain full and complete disclosure of documents and actions relevant to the Campaign Finance Act through efficient and effective educational, audit, and enforcement programs and activities.
Agency Management	Assimilate, maintain, and compile financial disclosure records received through electronic filing and by hard copy into an integrated, relational database.
Agency Management	Disseminate Financial Disclosure Records and Statistical Reports in a timely, efficient, and useful manner.

FY16 KPIs

Objective: Obtain full and complete disclosure of documents and actions relevant to the Campaign Finance Act through efficient and effective educational, audit, and enforcement programs and activities.

Measure	Target	Freq	Q1	Q2	Q3	Q4	Total	KPI Status	KPI Barriers
Percent of investigative matters closed within ninety (90) days of opening	100	Q							
Percent of informal hearings conducted and closed before the next filing deadline	100	Q	100	100	100	100	100	Met	
Percent of financial reports reviewed, evaluated, and analyzed before the next filing deadline	100	Q	100	100	100	100	100	Met	
Percent of Interpretative Opinions issued within thirty (30) days	100	Q			100		100	Met	
Percent of expedited advice for time-sensitive election related matters issued within fifteen (15) days of request	100	Q	100	100	100	100	100	Met	
Percent of periodic random audits conducted within sixty (60) days of initiation	100	Q	100	100	80	100	93.8	Nearly Met	

FY16 Workload Measures

Measure	Freq	Q1	Q2	Q3	Q4	Total
Total number of mandatory training conferences conducted	Q	12	7	7	8	34
Total number of financial reports filed electronically	Q	147	209	91	163	610
Total number of financial reports filed	Q	147	209	91	163	610

FY16 Initiatives

Title: Review Financial Reports, conduct periodic random and full field audits to ensure accurate reporting, and produce the Biennial Report.

Description: The Office of Campaign Finance will conduct at least four (4) periodic audits of the financial reports of principal campaign committees active during the 2016 election cycle following the December 10th, the March 10th, and the August 10th Filing Deadlines. At the close of each statutory filing deadline, the OCF will review 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; randomly audit the activity reports of the constituent service and Statehood fund programs following the close of the October 1st and the April 1st Filing Deadlines; 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 audit activities.

Complete to Date: Complete

Status Update: During FY16, the Agency issued one (1) Investigative Audit, four (4) Audits of Newly Elected Officials, and 19 Periodic Audits of candidates active in the 2015 and 2016 Election Cycles, Political Action Committees, and the Constituent Service Programs. The Audit Branch conducted 727 desk reviews of financial reports; issued 174 Requests for Additional Information, 91 auditees satisfactorily responded, and 66 are due in FY17; and referred 17 cases for enforcement, 9 were withdrawn. The Audit Branch approved 37 committees for termination.

Title: Promote compliance with the Campaign Finance Act.

Description: 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 during the June 14, 2016 Federal and Local Primary Election in the District of Columbia, 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 Precincts, and the financial operations and activity of the offices of the various entities registered with the OCF. The staff will provide counsel upon request and where necessary concerning the proper application of the campaign finance laws.

Complete to Date: Complete

Status Update: Site visits were organized to the Early Voting Centers and to 85 Election Precincts during the June 2016 Primary Election; and to the campaign offices of active candidates (3). Staff provided counsel where necessary. The OGC resolved 115 referrals on reporting deficiencies through informal hearings and issued 113 Orders of the Director. The Agency filed 40 Enforcement Petitions before the Board of Elections; completed one (1) investigation; issued two (2) interpretive opinions; and resolved 17 requests for advice on election related issues.

Title: Obtain full disclosure and increase voluntary compliance through the OCF Educational Program.

Description: The Office of Campaign Finance will develop, design, and introduce interactive training tutorials. The interactive training modules will invite the user to test their knowledge of the information presented. During the 2016 election cycle the OCF will increase its outreach services and activities at the OCF Website and Facebook Page, through the issuance of reminder letters of impending report dates, and the mandatory and bi-weekly training sessions to disseminate clear guidance and reinforce the most recent changes in the campaign finance laws mandated by the 'Campaign Finance Reform and Transparency Act of 2013'. The OCF will schedule and conduct Mandatory Training for each candidate for public office and the treasurer of each political committee, political action committee, or independent expenditure committee, within fifteen (15) calendar days of their registration with the Agency. 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 January 2016 for the continuing committees, the candidates and treasurers who register to participate in the 2016 Election Cycle, and for the constituent service and Statehood fund programs. The OCF will circulate surveys to the training participants during each onsite seminar to determine if the presentation achieved targeted satisfaction.

Complete to Date: Complete

Status Update: The OCF revised online tutorials for the successful e-filing of financial reports; published an interactive module to provide campaign finance law basics, and allow the user to test their understanding of the law; developed an online tutorial on the ANC candidate reporting requirements; and created a Twitter Account. Held 29 onsite training seminars and mandatory conferences, and included ANC candidate training for the first time. Issued 113 Certificates of Attendance to new candidates and treasurers.

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

Description: During FY15, 72.25% (757 of 985) of all financial reports filed with the Office of Campaign Finance were received electronically online at the OCF Web Site; and 228 paper reports were submitted. The number of paper reports submitted dramatically decreased after January 31, 2015, the effective date of the mandatory online filing requirement, except where actual hardship in complying was demonstrated. In FY15, there were approximately six (6) statutory filing deadlines which occurred on or before January 31, 2015 and five (5) statutory filing deadlines subsequent thereto. The remaining 25% (paper reports), at a minimum, of the total reports filed required data entry. The data entry must be completed prior to the next filing deadline to present an accurate portrayal of campaign activity. During FY16, it is anticipated the electronic filing statistics will continue to increase because of the mandatory online filing requirement, and the receipt of paper submissions will continue to require timely data entry.

Complete to Date: Complete

Status Update: In FY16, 100% of the 642 financial reports filed were e-filed at the OCF Web Site. There were a minimum of eleven (11) filing deadlines associated with the June 14, 2016 Primary Election, the pending November 8, 2016 General Election, and the Constituent Services and Statehood Fund Programs. The decline in paper submissions is directly attributable to the enactment of the 'Campaign Finance Reform and Transparency Act of 2013', which mandates the electronic filing of all reports unless actual hardship is demonstrated.

Title: Fully administer the requirement for mandatory electronic filing of all financial reports by all reporting entities.

Description: During FY15, the Office of Campaign Finance fully implemented those provisions of the 'Campaign Finance Reform and Transparency Amendment Act of 2013', applicable January 31, 2015, which require the online submission of all reports filed with the OCF, unless actual hardship in complying is demonstrated. The OCF will utilize the Mandatory Training Program during the 2016 election cycle to inform newly registered candidates and the committee treasurers of the mandatory online filing requirement. To foster compliance by the continuing committees and other filers, the OCF will continue to utilize the OCF Web Site, the OCF Facebook Page, the OCF Forms, the biweekly training seminars, and the issuance of reminder letters under the Filer Pre-Notification Program, to reinforce notice of the mandatory online filing requirement.

Complete to Date: Complete

Status Update: During FY16, the OCF achieved a 100% compliance rate with the mandate to e-file all financial reports at the OCF Web Site. 642 of the 642 total reports received were electronically filed. The OCF fully utilized its Educational Training Program, Website, Social Media Platforms, and Filer Pre-Notification Program to reinforce to the filing community the legislative mandate to submit all financial reports online with the OCF, unless actual hardship in complying is demonstrated.

Title: Upgrade of the Electronic Filing System.

Description: In FY16, the Office of Campaign Finance will upgrade the OCF Electronic Filing and Disclosure System to provide for an import module which will enable the import of contribution and expenditure records from either Excel or an XML template using pre-approved spreadsheets. This upgrade will eliminate the data entry of these records.

Complete to Date: Complete

Status Update: During FY 2016, the Office of Campaign Finance upgraded the Electronic Filing and Disclosure System to create a module which will allow the filer of financial reports to import contribution (Schedule A) and expenditure (Schedule B) records from pre-defined Excel template files. This feature will be made available to the filing community on November 4, 2016 to assist with the submission of the December 10, 2016 Report of Receipts and Expenditures.

Title: Ensure the Timely Dissemination and Transparency of Financial Reports.

Description: During FY16, the Office of Campaign Finance will employ an online survey to evaluate the effectiveness and efficiency of the OCF Web Site to deliver relevant information and services following the redesign and modernization of the Web Site and E-Filing System in FY15 to improve data access, system performance, and the navigation scheme. The results of the survey will aid the OCF in its ongoing effort to ensure the disclosure, transparency, and easy access by the public of the financial reports filed with the Agency.

Complete to Date: Complete

Status Update: The Office of Campaign Finance created and deployed an online survey in August 2016 for the public by link at the OCF Homepage, and for users of the e-filing applications by popup to assess the redesigned OCF E-Filing Applications and Web Site, launched on April 15, 2015. The survey will close at the OCF Web Site on December 31, 2016 for comments, and the results will be provided to the OCF for review.

Title: Increase Availability of Summary Information.

Description: During FY16, the Office of Campaign Finance will research, compile and publish comparative studies of campaign finance activity by various types of candidates and committees from past elections based on the OCF Biennial Reports of Contribution and Expenditure Information to depict increases or decreases in receipts or spending from prior election cycles.

Complete to Date: Complete

Status Update: On October 26, 2015, the online 'Quick Stats' Search Module was deployed to provide a quick view of data specific to principal campaign committees, including the top 10 committees by total contributions received by denomination or contributor type, and by total loans, where selected by specific year or date range. Pie charts depict the data in percentage terms. The data is extracted from the OCF Database, and allows for the comparison of the committees viewed. More refined data summaries will be introduced in FY17.

Office of Campaign Finance FY2016

Agency Office of Campaign Finance

Mission The mission of the Office of Campaign Finance (OCF) is to regulate and provide public disclosure and transparency to protect and 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. OCF also performs 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.

2016 Objectives

FY16 Objectives

Objective Number	Objective Description
Agency Management (3 Objectives)	
1	Obtain full and complete disclosure of documents and actions relevant to the Campaign Finance Act through efficient and effective educational, audit, and enforcement programs and activities.
2	Assimilate, maintain, and compile financial disclosure records received through electronic filing and by hard copy into an integrated, relational database.
3	Disseminate Financial Disclosure Records and Statistical Reports in a timely, efficient, and useful manner.

2016 Key Performance Indicators

Measure	Division	Frequency of Reporting	FY 2013	FY 2014	FY 2015	FY 2015 Target	FY 2016 Target
1 - Obtain full and complete disclosure of documents and actions relevant to the Campaign Finance Act through efficient and effective educational, audit, and enforcement programs and activities. (6 Measures)							
Percent of investigative matters closed within ninety (90) days of opening		Quarterly	6	100	100		100
Percent of informal hearings conducted and closed before the next filing deadline.		Quarterly	113	100	100		100
Percent of financial reports reviewed, evaluated, and analyzed before the next filing deadline.		Quarterly	953	100	100		100
Percent of periodic random audits conducted within sixty (60) days of initiation.		Quarterly	100	100	100		100
Percent of Interpretative Opinions issued within thirty (30) days.		Quarterly	3	0	100		100
Percent of expedited advice for time-sensitive election related matters issued within fifteen (15) days of request.		Quarterly	0	0	100		100

2016 Workload Measures

Measure	Frequency of Reporting	FY 2013	FY 2014	FY 2015
Workload Measure (3 Measures)				
Total number of mandatory training conferences conducted.	Quarterly	0	0	0
Total number of financial reports filed electronically.	Quarterly	754	638	1,043
Total number of financial reports filed	Quarterly	1,002	728	1,262

2016 Initiatives

Objective Number	Objective Title	Initiative Number	Initiative Title	Initiative Description
Agency Management - 1 (3 Initiatives)				
1		1.1	Review Financial Reports, conduct periodic random and full field audits to ensure accurate reporting, and produce the Biennial Report.	The Office of Campaign Finance will conduct at least four (4) periodic audits of the financial reports of principal campaign committees active during the 2016 election cycle following the December 10th, the March 10th, and the August 10th Filing Deadlines. At the close of each statutory filing deadline, the OCF will review 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; randomly audit the activity reports of the constituent service and Statehood fund programs following the close of the October 1st and the April 1st Filing Deadlines; 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 audit activities.
1		1.2	Promote compliance with the Campaign Finance Act.	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 during the June 14, 2016 Federal and Local Primary Election in the District of Columbia, 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 Precincts, and the financial operations and activity of the offices of the various entities registered with the OCF. The staff will provide counsel upon request and where necessary concerning the proper application of the campaign finance laws.

1		1.3	Obtain full disclosure and increase voluntary compliance through the OCF Educational Program.	The Office of Campaign Finance will develop, design, and introduce interactive training tutorials. The interactive training modules will invite the user to test their knowledge of the information presented. During the 2016 election cycle the OCF will increase its outreach services and activities at the OCF Website and Facebook Page, through the issuance of reminder letters of impending report dates, and the mandatory and bi-weekly training sessions to disseminate clear guidance and reinforce the most recent changes in the campaign finance laws mandated by the "Campaign Finance Reform and Transparency Act of 2013". The OCF will schedule and conduct Mandatory Training for each candidate for public office and the treasurer of each political committee, political action committee, or independent expenditure committee, within fifteen (15) calendar days of their registration with the Agency. 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 January 2016 for the continuing committees, the candidates and treasurers who register to participate in the 2016 Election Cycle, and for the constituent service and Statehood fund programs. The OCF will circulate surveys to the training participants during each onsite seminar to determine if the presentation achieved targeted satisfaction.
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TOT

Agency Management - 2 (3 Initiatives)

2		2.1	Complete the data entry of all financial records received by hard copy into the database before the next filing deadline.	During FY15, 72.25% (757 of 985) of all financial reports filed with the Office of Campaign Finance were received electronically online at the OCF Web Site; and 228 paper reports were submitted. The number of paper reports submitted dramatically decreased after January 31, 2015, the effective date of the mandatory online filing requirement, except where actual hardship in complying was demonstrated. In FY15, there were approximately six (6) statutory filing deadlines which occurred on or before January 31, 2015 and five (5) statutory filing deadlines subsequent thereto. The remaining 25% (paper reports), at a minimum, of the total reports filed required data entry. The data entry must be completed prior to the next filing deadline to present an accurate portrayal of campaign activity. During FY16, it is anticipated the electronic filing statistics will continue to increase because of the mandatory online filing requirement, and the receipt of paper submissions will continue to require timely data entry.
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2		2.2	Fully administer the requirement for mandatory electronic filing of all financial reports by all reporting entities.	During FY15, the Office of Campaign Finance fully implemented those provisions of the "Campaign Finance Reform and Transparency Amendment Act of 2013", applicable January 31, 2015, which require the online submission of all reports filed with the OCF, unless actual hardship in complying is demonstrated. The OCF will utilize the Mandatory Training Program during the 2016 election cycle to inform newly registered candidates and the committee treasurers of the mandatory online filing requirement. To foster compliance by the continuing committees and other filers, the OCF will continue to utilize the OCF Web Site, the OCF Facebook Page, the OCF Forms, the biweekly training seminars, and the issuance of reminder letters under the Filer Pre-Notification Program, to reinforce notice of the mandatory online filing requirement.
2		2.3	Upgrade of the Electronic Filing System.	In FY16, the Office of Campaign Finance will upgrade the OCF Electronic Filing and Disclosure System to provide for an import module which will enable the import of contribution and expenditure records from either Excel or an XML template using pre-approved spreadsheets. This upgrade will eliminate the data entry of these records.
TOT				
Agency Management - 3 (2 Initiatives)				
3		3.1	Ensure the Timely Dissemination and Transparency of Financial Reports.	During FY16, the Office of Campaign Finance will employ an online survey to evaluate the effectiveness and efficiency of the OCF Web Site to deliver relevant information and services following the redesign and modernization of the Web Site and E-Filing System in FY15 to improve data access, system performance, and the navigation scheme. The results of the survey will aid the OCF in its ongoing effort to ensure the disclosure, transparency, and easy access by the public of the financial reports filed with the Agency.
3		3.2	Increase Availability of Summary Information.	During FY16, the Office of Campaign Finance will research, compile and publish comparative studies of campaign finance activity by various types of candidates and committees from past elections based on the OCF Biennial Reports of Contribution and Expenditure Information to depict increases or decreases in receipts or spending from prior election cycles.
TOT				
TOT				

Office of Campaign Finance FY2017

Agency Office of Campaign Finance

Agency Acronym OCF

Agency C30
Code

To edit agency and POC information press your agency name (underlined and in blue above).

Agency Performance POCs Cecily (OCF) Collier-Montgomery; Nadine (OCF) Journiette

Agency Budget POCs Cecily (OCF) Collier-Montgomery; Nadine (OCF) Journiette

Fiscal Year 2017

When you believe you are finished with this phase of your Performance Plan, press edit in the upper right, check this box, and then press save.

2017 Strategic Objectives

Objective Number	Strategic Objective
1	Provide fair, effective, and timely enforcement programs and activities to increase and support the full, accurate, and complete disclosure of documents and actions relevant to the Campaign Finance Act.
2	Provide high quality educational outreach services (entrance conferences, training seminars, publications, and online tutorials) to increase full disclosure and voluntary compliance with the Campaign Finance Act.
3	Provide fair, effective, and efficient audit programs and activities to increase and support the full, accurate, and complete disclosure of documents and actions relevant to the Campaign Finance Act.
4	Provide a high quality web-internet based public disclosure system to receive the online submission of financial reports, and to ensure the availability of campaign finance data and information in a manner that is easy to navigate, search, sort, and retrieve at the OCF Website.
5	Create and maintain a highly efficient, transparent and responsive District government.**

2017 Key Performance Indicators

Measure	New Measure/ Benchmark Year	Frequency of Reporting	Add Data Fields (if applicable)	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Quarter 1
1 - Provide fair, effective, and timely enforcement programs and activities to increase and support the full, accurate, and complete disclosure of documents and actions relevant to the Campaign Finance Act. (3 Measures)										
Percent of informal hearings conducted and closed before the next filing deadline.		Quarterly		100%	100%	100%	100%	100%	100%	100%
Percent of Interpretative Opinions issued within thirty (30) days.		Quarterly		Not available	100%	100%	Not available	100%	100%	100%
Percent of expedited advice for time-sensitive election related matters issued within fifteen (15) days of request.		Quarterly		Not available	100%	Not available	100%	100%	100%	100%
2 - Provide high quality educational outreach services (entrance conferences, training seminars, publications, and online tutorials) to increase full disclosure and voluntary compliance with the Campaign Finance Act. (1 Measure)										
Total number of mandatory training conferences conducted.	✓	Quarterly		Not available	50	Not available	12	New Measure	1	1
3 - Provide fair, effective, and efficient audit programs and activities to increase and support the full, accurate, and complete disclosure of documents and actions relevant to the Campaign Finance Act. (2 Measures)										
Percent of financial reports reviewed, evaluated, and analyzed before the next filing deadline.		Quarterly		100%	100%	100%	100%	100%	100%	100%
Percent of periodic random audits conducted within sixty (60) days of initiation.		Quarterly		100%	100%	100%	100%	93.8%	100%	100%
4 - Provide a high quality web-internet based public disclosure system to receive the online submission of financial reports, and to ensure the availability of campaign finance data and information in a manner that is easy to navigate, search, sort, and retrieve at the OCF Website. (1 Measure)										
Total number of financial reports filed electronically.		Quarterly		638	638	638	147	610	246	246
5 - Create and maintain a highly efficient, transparent and responsive District government.** (10 Measures)										
Percent of investigative matters closed within ninety (90) days of opening		Quarterly		100%	100%	100%	Not available	0%	Needs Data Update	Needs Data Update
Contracts/Procurement-Expendable Budget spent on Certified Business Enterprises	✓			Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017

Contracts/Procurement- Contracts lapsed into retroactive status	✓	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Budget- Local funds unspent	✓	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Budget- Federal Funds returned	✓	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Customer Service- Meeting Service Level Agreements	✓	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Human Resources- Vacancy Rate	✓	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Human Resources- Employee District residency	✓	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Human Resources- Employee Onboard Time	✓	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017
Performance Management- Employee Performance Plan Completion	✓	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017	Forthcoming October 2017

2017 Operations

Operations Header	Operations Title	Operations Description	Type of Operations	# of Measures	# of Strategic Initiatives
1 - Provide fair, effective, and timely enforcement programs and activities to increase and support the full, accurate, and complete disclosure of documents and actions relevant to the Campaign Finance Act. (1 Activity)					
OFFICE OF THE GENERAL COUNSEL	Enforcement Program	The Office of the General Counsel provides legal advice and enforcement through the conduct of investigations and informal hearings, and the recommendation of decisions on charges of violations of the Campaign Finance Act; the issuance of interpretative opinions and expedited legal advice; the drafting of regulations and the review of OCF Forms for changes; the conduct of training seminars to promote voluntary compliance; and the coordination of site visits to the election precincts and early vote centers operated by the Board of Elections, and to campaign offices.	Daily Service	3	2
TOT				3	2
2 - Provide high quality educational outreach services (entrance conferences, training seminars, publications, and online tutorials) to increase full disclosure and voluntary compliance with the Campaign Finance Act. (1 Activity)					
TRAINING AND DEVELOPMENT	Educational Outreach Services	The OCF Educational Outreach Program assists with the coordination of the mandatory training conferences for new registrants, the onsite training seminars, the development of online brochures, interactive tutorials, and online tutorials, and the employee training program. The OCF Training Program also manages and utilizes the OCF Facebook Page as a training tool to disseminate information to the public. The Training Program distributes and evaluates surveys to training participants to assess the content and performance of the trainer.	Daily Service	1	2
TOT				1	2
3 - Provide fair, effective, and efficient audit programs and activities to increase and support the full, accurate, and complete disclosure of documents and actions relevant to the Campaign Finance Act. (1 Activity)					
REPORT ANALYSIS & AUDIT DIV.	Audit Programs	The Reports Analysis and Audit Division conducts audit analysis and reviews of all financial reports and statements received in the Agency; issues requests for additional information to filers where deficiencies are noted during the desk review process; conducts full field audits of the campaign operations of newly elected public officials, investigative audits of financial operations based on the receipt of complaints or based upon desk reviews; conducts periodic random audits of the reports filed by the constituent service programs, committees active during an election cycle, and continuing committees; and recommends the issuance of final audit reports based on the findings of full field and random periodic audits. Participates in site visits to election precincts, early voting centers, and to the offices of principal campaign committees.	Daily Service	2	2
TOT				2	2
4 - Provide a high quality web-internet based public disclosure system to receive the online submission of financial reports, and to ensure the availability of campaign finance data and information in a manner that is easy to navigate, search, sort, and retrieve at the OCF Website. (1 Activity)					
PUBLIC INFO. & RECORD MANAGEMENT	Public Information collection and dissemination online and onsite	The Public Information and Records Management Division publishes campaign finance data and information online at the DCF Website, and makes information available in the OCF Offices; compiles listings and reports of contribution and expenditure information published at the website and in the Biennial Report; manages the electronic filing and data entry of financial reports; oversees the registration of new candidates and committees, and coordinates the mandatory training of the new registrants; oversees the OCF e-mail subscription service; makes all public reports and statements available for the public within 48 hours of receipt; and conducts the Filer Pre-Notification and Failure to File Programs.	Daily Service	2	2
TOT				2	2
TOT				8	8

2017 Workload Measures

All Workload Measures must be linked to a specific Operation. If Workload Measures are already in the system but not yet linked, email the Office of Performance Management with a spreadsheet that identifies to which Operation each Workload Measure belongs.

Workload Measures - Operations	Measure	New Measure/ Benchmark Year	Add Historical and Target Data (FY17)	Numerator Title	Units	Frequency of Reporting	FY 2014	FY 2015	FY 2016 Actual	FY 2017 Quarter 1
1 - Enforcement Program (3 Measures)										
	Total number of investigations completed within 90 days	✓		# of investigations initiated	# of investigations completed within 90 days	Quarterly	Not available	Not available	New Measure	0
	Total number of informal hearings conducted	✓		# of referrals for initiation of the informal hearing process	# of actual hearings required	Quarterly	Not available	Not available	New Measure	27
	Total number of Interpretative Opinions and Expedited Advice issued	✓		# of requests for Interpretative Opinions and Expedited Advice received	# of Opinions and Advice issued	Quarterly	Not available	Not available	New Measure	7
2 - Educational Outreach Services (1 Measure)										
	Total number of mandatory training conferences conducted.			# of new candidates and committee treasurers registered with the Agency	# of actual mandatory conferences conducted	Quarterly	Not available	Not available	Needs Data Update	1
3 - Audit Programs (2 Measures)										
	Total number of financial reports reviewed, evaluated, and analyzed for the reporting period	✓		# of financial reports reviewed, evaluated, and analyzed for the reporting period	# of financial reports filed for the reporting period	Quarterly	Not available	Not available	New Measure	317
	Total number of periodic random and full field audits completed by the Audit Division	✓		# of random periodic and full field audits completed by the Audit Division	Total number of random periodic and full field audits initiated by the Audit Division.	Quarterly	Not available	Not available	New Measure	4
4 - Public Information collection and dissemination online and onsite (2 Measures)										
	Total number of financial reports filed electronically.			# of financial reports submitted online	# of actual financial reports submitted online	Quarterly	Not available	Not available	Needs Data Update	246
	Total number of financial reports filed			# of financial reports filed	# of actual financial reports submitted	Quarterly	Not available	Not available	Needs Data Update	246

2017 Strategic Initiatives

Strategic Initiative Title	Strategic Initiative Description	Proposed Completion Date	Add Initiative Update	# of Initiative Updates	Needs Initiative Update Notification
OFFICE OF THE GENERAL COUNSEL (2 Strategic initiative-operation links)					
Site Visits to Early Voting Centers and Election Precincts	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 during the November 8, 2016 General Election, to observe campaign activity. The OCF staff will provide counsel where necessary concerning the application of the campaign finance laws.	11-30-2016	Add Initiative Update	0	Needs Update
Creation of Expedited Advice Database	The Office of the General Counsel will create a database of advice issued concerning time-sensitive election related matters, numbered in chronological order and sorted by topic, for public search at the OCF Web Site. Because of time constraints, the requests for expedited advice are addressed within fifteen (15) days of receipt and are distinguished from requests for interpretative opinions. The creation of the database will provide an additional resource for the public relative to the application of the campaign finance laws, and a reference point for OCF to ensure the consistency of advice.	05-31-2017	Add Initiative Update	0	Needs Update
TOT				0	
PUBLIC INFO. & RECORD MANAGEMENT (2 Strategic initiative-operation links)					
Dissemination of Biennial Report	The Office of Campaign Finance will produce and disseminate in an electronic format on January 31, 2017, the OCF Biennial Report of Contributions and Expenditures to the Mayor and the Council of the District of Columbia, and to the public. The report will describe the receipts and expenditures of candidates for elective office, with the exception of ANC candidates, for the prior two year period, in dollar amount and percentage terms, by donor categories and the size of the donation, and expenditure type. Graphs will be used to present the percentage terms. The receipts and expenditures of the political committees, political action committees, and independent expenditure committees will also be summarized.	02-28-2017	Add Initiative Update	0	Needs Update
Evaluation of Online Survey	The Office of Campaign Finance will evaluate the results of the online survey employed during FY 2016 to evaluate the effectiveness of the OCF Web Site to deliver relevant information and services following the redesign and modernization of the Web Site and E-Filing System in FY 2015 to improve data access, system performance, and the navigation scheme. The OCF will consider and implement the recommendations, if any, of the Survey, where feasible.	09-30-2017	Add Initiative Update	0	Needs Update

TOT

0

REPORT ANALYSIS & AUDIT DIV. (2 Strategic Initiative-operation links)

Conduct Periodic Random Audits	During FY 2017, the Office of Campaign Finance will conduct periodic random audits of the activity reports of the Constituent Service and Statehood Fund Programs following the close of the October 1st and April 1st Filing Deadlines, and of the continuing committees following the January 31st and July 31st Filing Deadlines.	09-30-2017	Add Initiative Update	0	Needs Update
Full Field Audit of Campaign Operations	The Office of Campaign Finance will select for full field audit the campaign operations of the principal campaign committees of candidates newly elected to Office following the certification of the results of the November 8, 2016 General Election by the Board of Elections. The conduct of an audit will require the reporting entity to submit all banking records and statements, invoices, loan documents, and receipts maintained in support of the transactions reported during the coverage period. This will allow the Audit Division to verify report entries against the supporting documentation and ensure the accuracy of the financial transactions.	09-30-2017	Add Initiative Update	0	Needs Update

TOT

0

TRAINING AND DEVELOPMENT (2 Strategic initiative-operation links)

Increase Educational Outreach to ANC Candidates	During the 2016 Election Cycle, the Office of Campaign Finance will increase its outreach services and activities at the OCF Website, Facebook Page, and Twitter Account, and through the issuance of reminder letters of the impending report date, and onsite training seminars, to focus on the reporting requirements of Advisory Neighborhood Commission Candidates, specifically the use of disclaimers on campaign literature, and the requirement to electronically file the Summary Financial Statement Form within sixty (60) days following the certification of the November 2016 General Election Results by the Board of Elections. This will increase the compliance rate of the candidates with the reporting requirements of the Campaign Finance Act.	03-31-2017	Add Initiative Update	0	Needs Update
Mandatory and Continuing Educational Programs	During FY 2017, the OCF will continue to schedule and conduct Mandatory Training for each candidate for public office and the treasurer of each committee within fifteen (15) calendar days of their registration with the Agency. The Agency will conduct onsite monthly training sessions, commencing January 2017 for the public, continuing committees, and for the Constituent Service and Statehood Fund Programs. The OCF will circulate surveys at the end of each training session to the participants to evaluate if the presentation achieved targeted satisfaction, and make changes, where necessary.	09-30-2017	Add Initiative Update	0	Needs Update

TOT

0

TOT

0

2017 Initiative Updates

Initiative Updates	Strategic Initiative-Operation Link - Strategic Initiative Title	Initiative Status Update	% Complete to date	Confidence in completion by end of fiscal year (9/30)?	Status of Impact	Explanation of Impact	Supporting Data	FY2017 Quarters
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No initiative updates found

2017 Special Mayoral Plans

Strategic Initiative Header	Strategic Initiative Title	Special Mayoral Plan	Mayoral Plan Domain	Mayoral Plan Goal	Mayoral Plan Action
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No links to special mayoral plans found

Administrative Information**FY Performance Plan** Office of Campaign Finance FY2017 **Record ID#** 337Created on Dec. 15, 2015 at 4:14 PM (EST). Last updated by Collier-Montgomery, Cecily (OCF) on July 27, 2016 2:08 PM at 2:08 PM (EDT). Owned by Fowler-Finn, MeghanMarie (OSSE).



**OFFICE OF CAMPAIGN FINANCE
DISTRICT OF COLUMBIA BOARD OF ELECTIONS
WASHINGTON, D.C. 20009**

January 31, 2017

The Honorable Charles Allen
Member of the Council of the District of Columbia from Ward 6
The John A. Wilson Building
1350 Pennsylvania Avenue, N.W., Suite 110
Washington, D.C. 20004

Dear Councilmember Allen:

This is to forward the January 31, 2017 Biennial Report of the Office of Campaign Finance, for your consideration and review. The Biennial Report covers the period from January 2015 through December 2016. The Biennial Report is provided to you in an electronic format, and by email transmission. The Biennial Report will be made available in an electronic format for public review in the Washingtoniana Division of the District of Columbia Public Library and in the Office of Campaign Finance, and through internet access at the OCF Web Site, www.ocf.dc.gov. The Washingtoniana Division is located in the Martin Luther King, Jr. Memorial Library.

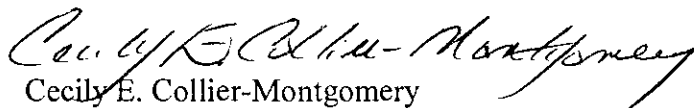
As you are aware, D.C. Official Code, § 1-1163.04 (7) (2001 Edition, as amended), requires the Director of the Office of Campaign Finance to present to the Mayor, the Council, and the general public, commencing January 31, 2001, and every two years thereafter, a biennial report, summarizing, for the prior two year period, the receipts and expenditures of candidates for public office (except candidates for Advisory Neighborhood Commission Member), and of political committees, including principal campaign, exploratory, inaugural, transition, and legal defense committees; political action committees; and independent expenditures.

New to the 2017 Biennial Report, is the listing and chart depicting the "Top Three Committees by Contributions Received" during the past two year period by office type under Part I, Candidates and Principal Campaign Committees. The "Top Three Committees by Contributions Received" is also presented in Part II, Political Action Committees, Part III, Independent Expenditures, Part IV, Inaugural Committees, and Part V, Exploratory Committees.

The January 31, 2017 Biennial Report depicts in dollar amount and percentage terms contributions by the size of the donation and donor type, and expenditures by various categories. Graphs are used to present the percentage terms. Since the submission of the first Biennial Report on January 31, 2001, the Office of Campaign Finance has developed Summary Reports at the OCF Web Site, www.ocf.dc.gov, of the Reports of Receipts and Expenditures filed by candidates and committees, at the close of each statutory deadline. The Summary Reports detail the dollar amount and percentages associated with the receipts by donor type and size, and the expenditures by various categories, for the reporting period. The Summary Reports covering the period from January 2015 through December 2016 provided the foundation for the cumulative 2017 Biennial Report.

Should you have any questions or concerns, I may be reached on (202) 671-0550.

Sincerely,


Cecily E. Collier-Montgomery
Director

Enclosure

Research Memorandum

To: Director
CC: General Counsel
From: Austin Franklin
Date: 6/7/2016
Re: Citizen Fair Election Program Amendment Act of 2015

Summary of Bill

Important Provisions

The Office of Campaign Finance is abolished and all of its functions, duties and responsibilities are transferred to the Citizens Fair Election Oversight Office. The Citizens Fair Election Oversight Office would administer all the laws and regulations currently administered by the Office of Campaign Finance.

The bill applies to candidates seeking nomination for election for Mayor, Attorney General, or member of the Council. This program is totally voluntary, candidates can choose to participate in the program.

An election fund would be created and the Oversight Office would use those funds to match small donor contributions at a 5:1 ratio.

Funds shall be distributed to participating candidates through the use of an electronic funds exchange or a debit card.

A candidate shall not be eligible to receive an allocation from the Elections Fund for a general election unless the candidate's party nominated the candidate to be placed on the ballot for the general election or the candidate is otherwise qualified to be on the ballot.

Contributions can be made by personal check, credit card, or by using an electronic payment account. Each qualifying contribution must be accompanied by a signed statement containing the contributor's name, occupation and the contributor's address and an oath declaring that the contributor (1) Understands that the purpose of the qualifying contribution is to show

support for the candidate so that the candidate may qualify for public financing (2) is making the contribution in his or her own name and from his or her own funds (3) had made the contribution willingly and has not received anything of value in return for the contribution.

A receipt will be given to the contributor and a copy of said receipt will be kept with the candidate's committee. No person may be paid a commission on a per-qualifying contribution basis for collecting qualifying contributions.

A candidate is prohibited from accepting contributions from any other source, including an unexpended contribution received by the candidate with respect to a previous election or a contribution made by any political committee or multicandidate committee.

However, a political committee that is not a principal campaign committee of the candidate or a political party may accept contributions other than contributions described in the paragraph above. A political committee may accept contributions from any person or business entity if (1) The aggregate amount of the contributions from such person for any election during the election cycle does not exceed \$100 and no portion of such contributions is disbursed in connection with the campaign of the participating candidate.

Unexpended contributions received by the candidate or an authorized committee of the candidate with respect to a previous election may be retained, but only if the candidate places the funds in escrow and refrains from raising additional funds for or spending from that account during the election cycle in which a candidate is a participating candidate.

A candidate who participates in public financing must participate in one public debate before the primary election and two public debates before the general election.

The candidate must return unspent funds within 30 days after the election. The money must be returned to the Oversight Office for deposit into the Elections Fund.

If a candidate accepts a prohibited contribution or makes a prohibited expenditure, the Oversight Office shall assess a civil penalty against the candidate in an amount that is not more than three (3) times the amount of the contribution or expenditure. Any fines collected will be deposited into the Elections Fund.

No candidate, whether or not a participating candidate, shall solicit funds, appear at a fundraising event, or engage in other fundraising activity for any person making independent expenditures that can reasonably be expected to support the candidate.

Purpose of Bill

- To encourage participation in the electoral process from a diverse pool of D.C. residents.
- Specifically, increase the racial and socioeconomic diversity of the small donor pool.
- Encourage and assist candidates in moving away from depending on large corporate donors, especially donors that do not live within the District of Columbia.
- Limit the influence of corporations and big donors while giving D.C. residents a larger voice in the electoral process.

Proponent of the Bill Argue

- The cost of the program would be negligible to the D.C. budget.
- Participating candidates would have to demonstrate the viability of their campaign in order to receive funding.
- A similar program was implemented in New York City where the City saw a 40% increase in small donor contributions.
- Similar programs can be found in Maine, Seattle, Washington, New York City and Montgomery County, Maryland.
- 80% of District Residents favor implementing a public financing system.
- The U.S. Public Interest Research Group (PIRG) found that implementing the Fair Elections Program would raise the percentage of funds coming from small donors from 4.8% to 64%-- a thirteen-fold increase.

Analysis

After conducting research on the issue of adopting a public financing program I found that the major criticism of public financing programs is that they are largely ineffective in changing the outcome of elections. It must be stated that the research conducted by PIRG clearly states that the purpose of adopting a public financing system isn't to create different winners and losers but to create a more robust participation in the electoral process by increasing both the racial and socioeconomic diversity of the small donor pool.

Public funding has been in place at the federal level since 1976. Critics of these programs argue that candidates that opt into these programs rarely win elections against incumbents that choose to opt out of the public campaign financing program. University of Wisconsin political scientist Kenneth Mayer, who has spent a decade studying public campaign finance, gave an interview to the Washington Post where he stated "The people who propose these systems often oversell them, from what we've observed in places that have various types of public funding, the impacts are actually a lot more marginal."

For example, Paul A. Diller, an Associate Professor of Law at Willamette University College of Law presented an article to the Willamette Law Review symposium, titled *Campaign Finance and the 2012 Election*, on February 8, 2013.

Diller performed a case study on public campaign financing in Portland, Oregon. Voters in Portland, Oregon, voted to do away with public campaign financing in 2010 after just five years of using the system. There were three election cycles during the five year period between the years of 2005-2010 and just two of nine publicly funded candidates ever won their races.

A study conducted by the Brennan Center for Justice at NYU School of Law and the Campaign Finance Institute in 2012 found that New York City's public financing system did significantly increase both the racial and socioeconomic diversity of the small donor pool. However, the increase in small donor activity was accompanied by an increase of spending by independent expenditure committees who used their unlimited spending power to get their message across. During the 2013 New York City council races, candidates were outspent as much as 3-to-1 by outside groups. This shows that special interest groups will simply spend more money to get their message out if they find that candidates benefiting from the public financing program are gaining a larger voice.

Further, in 1999 Bradley A. Smith, Professor of Law at Capital University Law School published an article in the University of Pennsylvania Law School Law Review titled *Some problems with Taxpayer-Funded Political Campaigns*. This law review article focuses on whether large donors actually create an unfair electoral process and whether public financing is an appropriate means of achieving a more balanced electoral process.

Suggestion

A provision should be added to the law that would call for a referendum in five years to vote on whether the residents of D.C. want to keep funding the program, modify the program, or do away with it in its entirety. A similar provision was included in the Portland, Oregon public financing law which allowed Portland residents the opportunity to close the program after five years and three election cycles.

**OCF RESPONSE TO QUESTION #24
(GENERAL QUESTIONS)
OCF EMPLOYEES WHOSE SALARIES EXCEED \$100,000**

FY 16

Employee Name	Position Number	Title	Program Number	Activity Number	Salary	Fringe Benefits	Overtime/ Bonus
Cecily E. Collier-Montgomery	00020745	DIRECTOR	1090	1090	\$167,835.20	\$36,722.34	None
Williams SanFord	00016330	General Counsel	2030	2030	\$122,931.80	\$26,897.48	None
Jean Diggs	00024372	Hearing Examiner	2030	2030	\$121,743.60	\$26,637.51	None
Renee Rollins	00021921	Audit Manager	2020	2010	\$116,106.60	\$25,404.13	None
Erick Jackson	00077038	Auditor	2020	2010	\$101,385.00	\$22,183.04	None

FY 17

Employee Name	Position Number	Title	Program Number	Activity Number	Salary	Fringe Benefits	Overtime/ Bonus
Cecily E. Collier-Montgomery	00020745	DIRECTOR	1090	1090	\$172,870.30	\$40,451.64	None
Williams SanFord	00016330	General Counsel	2030	2030	\$131,537.00	\$30,779.66	None
Vacant Position	00024372	Hearing Examiner	2030	2030	\$119,591.00	\$27,984.29	None
Renee Rollins	00021921	Audit Manager	2020	2010	\$119,589.80	\$27,984.02	None
Erick Jackson	00077038	Auditor	2020	2010	\$104,423.00	\$24,434.98	None

OCF RESPONSE TO QUESTION #30 (General Questions)

FY 16 Contracts Listed by Vendor Name, Nature of Procurement, Dollar Amount, Budget Amount, Actually Spent, Term of Procurement, Competitively bid or not, Fund Sources and Contract Monitor

Vendor Name	Nature of Contract/End product/Services	Dollar Amount	Budgeted Amount	Actually Spent	Term of Contract	Comp Bid/ Yes/ No	Fund Source	Contract Monitor
MVS PO533797	Copier Maintenance for FY16	\$6,708.24	\$6,708.24	\$6,708.24	10/2015-09/3016	Yes	0410	Sidney Wesley Williams
DataNet System Corp. PO539461	OCF Website and E-Filing System Maintenance FY16	\$51,744.00	\$51,744.00	\$51,744.00	10/2015-09/2016	Yes	0410	Sidney Wesley Williams
American Corp. Families PO544426	Business Directory	\$3,835.00	\$3,835.00	\$3,835.00	10/2015-09/2016	Yes	0410	Sidney Wesley Williams
Graduate School PO544455	Training Two (2)Days Sept. 27 – Sept. 28, 2016 Dev. And Presenting Audit Findings	\$6,983.00	\$6,983.00	\$6,983.00	10/2015-09/2016	Yes	0410	Sidney Wesley Williams
Tecknomic PO544903	Training Two (2) Days Basic Writing Skills and Presentation Skills	\$13,125.00	\$13,125.00	\$13,125.00	10/2015-09/2016	Yes	0410	Sidney Wesley Williams
Premier Supplies PO546821	Office Supplies	\$15,864.34	\$15,864.34	\$15,864.34	10/2015-09/2016	Yes	0410	Sidney Wesley Williams
West Publishing PO548029	OCF Law Books Codes	\$2,285.56	\$2,285.56	\$2,285.56	10/2015-09/2016	Yes	0410	Sidney Wesley Williams
Inkjet Supplies PO548616	Office Supplies	\$3,885.28	\$3,885.28	\$3,885.28	10/2015-09/2016	Yes	0410	Sidney Wesley Williams
						Yes	0410	

FY 17 Contracts Listed by Vendor Name, Nature of Procurement, Dollar Amount, Budget Amount, Actually Spent, Term of Procurement, Competitively bid or not, Fund Sources and Contract Monitor

Vendor Name	Nature of Contract/End product/Services	Dollar Amount	Budgeted Amount	Actually Spent	Term of Contract	Comp Bid/ Yes/ No	Fund Source	Contract Monitor
MVS PO533797	Copier Maintenance for FY17	\$7,043.76	\$7,043.76	\$7,043.76	10/2016-09/2017	Yes	0410	Sidney Wesley Williams
DataNet System Corp.	OCF Website and E-Filing System Maintenance FY17	\$53,772.96	\$53,772.96	\$53,772.96	10/2016-09/2017	Yes	0410	Sidney Wesley Williams

OCF RESPONSE TO QUESTION NO. 8 (AGENCY OPERATIONS)

LIST OF OCF ELECTRONIC DATABASES

- 8. Please identify all electronic databases maintained by your agency, including the following:**
- a. A detailed description of the information traced within each system;**
1. Using the E-Filing System, the Agency tracks data from the registration statements of all filer types, the reports of receipts and expenditures, and financial statements; reporting deadline compliance; and hard copy filings for the following filers:
 - 1) Candidate/Principal Campaign Committees
 - 2) Political Action Committees (Includes Initiative, Referendum and Recall)
 - 3) Exploratory Committees
 - 4) Legal Defense Committees
 - 5) Transition Committees
 - 6) Inaugural Committees
 - 7) Lobbyists – discontinued since June 2013
 - 8) Senators and Representatives Statehood Funds
 - 9) Constituent Service Programs
 - 10) Financial Disclosure Statement (FDS) – discontinued since June 2013
 - 11) Advisory Neighborhood Commission Candidates
 - 12) Independent Expenditure Committees
 2. The agency maintains and tracks the following electronic information through search features which are accessible by the Public:
 - 1) Contributions and Expenditures of committees and Constituent Service Programs by amount, contributor, recipient, date, location, payer, and payee
 - 2) Electronic disclosure of Registrant Statements of committees and Constituent Service Programs
 - 3) Affiliated Entity Search
 - 4) Active Committees Search
 - 5) Active Candidates Search
 - 6) Quick Statistics for Principal Campaign Committees
 - a. Total Contributions by Denomination
 - b. Total Contributions by Contributor Type
 - c. Top 10 Committees by Total Contributions
 - d. Top 10 Committees by Total Loans
 - e. Recently Formed Committees
 - 7) Digital Images of the Financial Reports filed with OCF, both electronically, and by paper based filings, beginning 2005, by
 - a. Candidates and Political Committees
 - b. Political Action Committees (Includes Initiative, Referendum and Recall)
 - c. Exploratory Committees
 - d. Legal Defense Committees
 - e. Transition Committees
 - f. Inaugural Committees

- g. Lobbying Program - until 2012
- h. Citizen-Service Program
- i. Senator/Representative Statehood Funds
- j. Filers of the Financial Disclosure Statement – until 2012
- k. Advisory Neighborhood Commission Candidates
- l. Independent Expenditure Committee

3. The Agency also maintains the following information on its Website, which is available to the Public:

- 1) Administrative Dismissal and Vacated Orders of
 - a. Candidates and Political Committees
 - b. Lobbying Program
 - c. Citizen-Service Program
 - d. Financial Disclosure Program
- 2) Complaints & Final Decisions
- 3) Final Audit Reports
- 4) Informal Hearings on Delinquent Filers including:
 - a. Candidates and Political Committees
 - b. Lobbying Program till 2011
 - c. Citizen-Service Program
 - d. Financial Disclosure Program till 2011
- 5) Interpretative Opinions
- 6) Biennial Reports (under News Room)
- 7) Calendar of Events
- 8) OCF Regulations and Campaign Finance Guide
- 9) Summary Reports of Contributor and Expenditure Information with Graphs
- 10) Educational Brochures and Online Tutorials

- b. The age of the system and any discussion of substantial upgrades that have been made or are planned to the system;

Age and Past Upgrades

- 1. The Electronic Filing System (EFS) is about 15 years old. The System was implemented and commissioned in August, 2002
- 2. The scanning system was integrated into the EFS in November, 2003
- 3. Biennial Reporting module was integrated into the system in 2007
- 4. The Electronic Signature modules integration that enables filers to file their online report without the need for a hard copy filing requirement was implemented in FY 10.
- 5. The Database download enables the public to download the reports of receipts and expenditures for political committees, Constituent Service and Statehood Fund Programs, and lobbyists in CSV and XML formats was implemented and integrated into the EFS module in 2010.
- 6. Implemented Cross-Browser Compatibility in 2010, so that the Electronic filing Application is compatible for all browsers, including IE6.0 and above, Firefox, Safari and Chrome.
- 7. Additional Filer types (Exploratory, Transition, Legal Defense, and Inaugural Committees) added to the OCF e-Filing System – July 2013
- 8. Reports and Summaries for the Constituent Service Programs implemented - August 2014

9. Reports and Summaries for the Statehood Fund Programs implemented – August 2014

Enhancements FY15

10. The OCF e-Filing System was re-written using ASP.NET 4.5 to offer better security, better performance and usability. The e-Filing System was originally created using Classic ASP in 2002. - February 2015
11. Enabled online Registration for all filer types
12. Enabled Approval of Online Registration by OCF Staff
13. Added Biennial Reports for Exploratory, Transition, Inaugural, and Legal Defense Committees - January 2015
14. Registrant Disclosure Search - This module provides detailed information on filers' registration statements and their filings, audit reports, and hearing orders. February 2015
15. The Contribution and Expenditure search feature was upgraded to include multiple search parameters including Recipient, Report, Amount, Receipt Date, Contributor, Contributor Location, and Contributor Type - February 2015.
16. Reports and Summaries Upgrade: All the reports under this section will automatically be generated along with the report submissions - February 2015.
17. Ability for Political Campaign Committees to file Consolidated Reports Online - February 2015.
18. Enabled reporting contributions from Affiliated entities and contribution limit validation for the same
19. Bulk Download: OCF has redesigned the Contributions and Expenditures search to include additional filters below:
 - Report Name
 - Contributor Location
 - Contribution type

This module allows the user to export the search results to Excel, CSV, or XML file. Users can also search within the results. - February 2015.

c. Whether the public can be granted access to all or part of each system

The public user already has access to part of the system.

Public user rights are listed below

- i. View all submitted filings by all the filers in the system
- ii. Search and download contributions and expenditures
- iii. View all filer registrations and filing history
- iv. Search Affiliated Entities
- v. Quicks stats on contributions and recently formed committees

Identification of persons who have access to each system, and whether the public can be granted access to all or part of each system:

Modules	Administrator Section	User Filing Section
1. Candidate/Principal Campaign Committees Online Registration, EFS	OCF Staff	Filer
2. Political Action Committees (Includes Initiative, Referendum and Recall) Online Registration, EFS	OCF Staff	Filer
3. Lobbyists EFS	OCF Staff	Discontinued since June 2013
4. Exploratory Committees Online Registration, EFS	OCF Staff	Filer
5. Senators and Representatives Statehood Funds Online Registration, EFS	OCF Staff	Filer
6. Citizen-Service Programs Online Registration, EFS	OCF Staff	Filer
7. Independent Expenditure Committee Online Registration, EFS	OCF Staff	Filer
8. Financial Disclosure Statement (FDS) EFS	OCF Staff	Discontinued since June 2013
9. Advisory Neighborhood Commissioners EFS	OCF Staff	Filer
10. Administrative Dismissal and Vacated Orders	OCF Staff	Public Viewing
11. Complaints & Final Decisions	OCF Staff	Public Viewing
12. Final Audit Reports	OCF Staff	Public Viewing
13. Informal Hearings on Delinquent Filers	OCF Staff	Public Viewing
14. Interpretative Opinions	OCF Staff	Public Viewing
15. Images of Financial Reports submitted, beginning 2005	OCF Staff	Public Interaction
16. Contribution and Expenditure Search Feature	OCF Staff	Public Interaction

17. Registrant Disclosure Search	OCF Staff	Public Interaction
18. Affiliated Entity Search	OCF Staff	Public Interaction
19. Active Committee	OCF Staff	Public Interaction
20. Active Candidate	OCF Staff	Public Interaction
21. Quick Statistics	OCF Staff	Public Interaction
22. Biennial Reports and Summary Reports	OCF Staff	Public Viewing
23. Calendar of Events, Regulations, Campaign Finance Guide, News Items, Online Tutorials, and Educational Brochures	OCF Staff	Public Viewing

<u>Committee Name</u>	<u>Candidate Name</u>	<u>Registered Date</u>	<u>Todays Date</u>	<u>Total Contributions</u>	<u>Total Expenditures</u>	<u>Total Loans</u>
2006 Orange for Mayor	Vincent Orange	06/24/2005	01/31/2017	\$494,488.00	\$589,601.71	\$97,500.00
Orange for Chair	Vincent Orange	05/10/2010	01/31/2017	\$310,138.00	\$373,753.84	\$70,000.00
Carol Schwartz for Mayor Commitee	Carol Schwartz	06/10/2014	01/31/2017	\$73,716.00	\$127,220.89	\$102,000.00
Carol Schwartz 2008	Carol Schwartz	06/20/2008	01/31/2017	\$209,753.50	\$236,916.76	\$64,060.90
Zukerberg for Attorney General	Paul Zukerberg	11/08/2013	01/31/2017	\$96,919.07	\$138,332.02	\$40,000.00
Friends of Courtney R. Snowden	Courtney Snowden	06/18/2014	01/31/2017	\$157,803.18	\$165,847.87	\$16,000.00
Karl Racine For AG	Karl Racine	07/15/2014	01/31/2017	\$658,217.29	\$989,986.53	\$451,000.00
Kinlow Ward 8 Strong	Eugene Kinlow	12/23/2014	01/31/2017	\$107,463.93	\$113,163.28	\$9,000.00
Biddle 2012	Sekou Biddle	11/08/2011	01/31/2017	\$94,394.41	\$103,205.31	\$10,000.00
Committee to Elect Sekou Biddle At-Large	Sekou Biddle	12/23/2010	01/31/2017	\$201,086.00	\$211,637.76	\$15,000.00
Friends of Leon T. Andrews, Jr.	Leon Andrews	01/07/2015	01/31/2017	\$55,678.00	\$151,348.52	\$96,000.00
Sheila Bunn for Ward 8	Sheila Bunn	01/07/2015	01/31/2017	\$53,888.16	\$91,390.90	\$44,919.42
Committee to Elect Natalie Williams for Ward 8	Natalie Williams	12/29/2014	01/31/2017	\$34,438.16	\$66,549.58	\$24,414.86
Kinlow Ward 8 Strong	Eugene Kinlow	12/23/2014	01/31/2017	\$107,463.93	\$113,163.28	\$9,000.00
Elect Renee Bowser	Renee Bowser	12/12/2014	01/31/2017	\$50,523.93	\$84,693.10	\$42,000.00
Committee to Elect Khalid Pitts 2014	Khalid Pitts	04/02/2014	01/31/2017	\$189,252.99	\$231,320.30	\$15,000.00
Toliver for Ward 4	Dwayne Toliver	01/09/2015	01/31/2017	\$33,784.00	\$38,532.19	\$5,000.00
Abraham for Ward 8	Jauhar Abraham	12/31/2014	01/31/2017	\$4,728.20	\$9,631.59	\$5,026.98

2016 Committees

Klokel At Large	Matthew Klokel	07/15/2016	01/31/2017	\$306.66	\$352.00	\$352.00
Carter for DC	Ashley Carter	06/24/2016	01/31/2017	\$16,556.94	\$26,106.74	\$10,000.00
Mary Lord 2016	Mary Lord	05/16/2016	01/31/2017	\$6,025.00	\$7,928.59	\$3,000.00
Friends of Leon T. Andrews, Jr. 2016	Leon Andrews	02/02/2016	01/31/2017	\$62,321.95	\$196,442.84	\$140,000.00
Robert White At-Large 2016	Robert White	12/11/2015	01/31/2017	\$436,999.86	\$443,583.70	\$2,031.03