

February 9, 2015

The Honorable Kenyan McDuffie  
Councilmember, Ward 5  
Chairperson, Committee on The Judiciary  
The John A. Wilson Building  
1350 Pennsylvania Avenue, NW, Suite 506  
Washington, D.C. 20004

Dear Chairperson McDuffie:

This is to submit on behalf of the District of Columbia Office of Campaign Finance (OCF), the enclosed Government Managers Accountability Act of 1995: Fiscal Year 2014 Performance Report. I have also enclosed the Responses of the Agency to the Performance Oversight Pre-Hearing Questions. If you require additional information, please let me know.

Respectfully,

Cecily E. Collier-Montgomery  
Director

Enclosures

cc: Kate Mitchell  
Committee Director

**FEBRUARY 9, 2015**

***GOVERNMENT MANAGERS  
ACCOUNTABILITY ACT OF 1995:***

***FISCAL YEAR 2014  
PERFORMANCE REPORT  
FOR THE  
OFFICE OF CAMPAIGN FINANCE***

## **THE OFFICE OF CAMPAIGN FINANCE**

The Office of Campaign Finance (OCF) is established within the District of Columbia Board of Elections (the “Board”). The Office is responsible for the administrative operations of the Board pertaining to the Campaign Finance Laws of the District of Columbia. The Agency plays a vital role in ensuring the integrity of the electoral process and government service by regulating the financial operations of candidates, political committees, political action committees, independent expenditure committees, and the Constituent Service and Statehood Fund Programs of those government officials who are elected to public office.

The mission of the Office is to enhance the confidence of the residents of the District of Columbia in the integrity of the election process and government service, by monitoring, aiding through education, and enforcing compliance with the District’s Campaign Finance Laws.

By virtue of the enactment of D.C. Law 19-0124, the “Board of Ethics and Government Accountability Establishment and Comprehensive Ethics Reform Act of 2011” (the “Ethics Reform Amendment Act of 2011” or the “Ethics Act”), effective April 27, 2012, the local campaign finance laws are now found in Title III, “Campaign Finance”, titled the “Campaign Finance Act of 2011” ( the “Campaign Finance Act” or the “Act”), of the Ethics Act, and codified in D.C. Official Code §§ 1-1163.01 et seq. (2001 Edition, as amended).

As a whole, the “Ethics Reform Amendment Act of 2011” permanently changed the landscape of the Office of Campaign Finance. The Office of Campaign Finance was formerly responsible for the enforcement of the financial disclosure, conflicts of interest, and lobbying laws of the District of Columbia. Effective October 2, 2012, the Board of Ethics and Government Accountability (the “Board of Ethics”), was established under the Ethics Act, to oversee the public reporting of public officials, and to administer the conflict of interest and lobbying laws.

The Campaign Finance Act of 2011 established the new inaugural, transition, and legal defense committees, and requires these committees, as well as exploratory committees, to register and file financial reports with the Office of Campaign Finance.

## CURRENT CHANGES IN THE CAMPAIGN FINANCE LAWS

The provisions of D.C. Law 20-79, the “Campaign Finance Reform and Transparency Amendment Act of 2013” (the “Campaign Finance Reform Act of 2013”, effective February 22, 2014), and made applicable January 31, 2015, establishes more robust record keeping, reporting, and disclosure requirements, and enforcement practices. Specifically, the legislation prescribes strong regulation of contributions by related business entities, and the bundling of contributions; mandates the electronic filing of financial reports to ensure real time disclosure; mandates training for new candidates and committee treasurers; and increases civil penalties with application to individuals. The legislation places all committees associated with a candidate, including the principal campaign, exploratory, inaugural, transition, and legal defense committees, within the definition, the “political committee”, and clearly defines and distinguishes political action committees and independent expenditure committees. The increased disclosure requirements will make campaign operations more transparent and accountable, and create a better informed electorate of the sources of the flow of money in the election process.

## ORGANIZATION AND FUNCTIONS

The Office of Campaign Finance is organized into three major divisions which operate under the direction of the Office of the Director: the Public Information and Records Management Division (PIRM), the Reports Analysis and Audit Division (RAAD), and the Office of the General Counsel (OGC). The primary outputs of the Office of Campaign Finance include the processing of documents required by law to be filed with the Agency; the conduct of desk and field audits; the development of statistical reports and summaries compiled from the financial reports of the various filing entities; the dissemination of reports and summaries to the public; the conduct of investigations and hearings on alleged violations of the Campaign Finance Act; the drafting of proposed legislation and regulations; and the rendering of interpretative opinions concerning the application of the Act. The Organizational Charts of the Agency are attached.

## OFFICE OF THE DIRECTOR

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, issues final decisions, and where appropriate, imposes fines; 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 computer systems administration and data support in maintaining the OCF Web Site, the Electronic Filing and Reporting System, and a cross index system for the thousands of pages of documents filed with the OCF. All non-personal service funds are allocated to the Office of the Director for each program area.

#### OFFICE OF THE GENERAL COUNSEL

The Office of the General Counsel (OGC) is responsible for providing 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 Office of the General Counsel prepares draft regulations, recommends legislative changes, conducts educational seminars, 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 voluntary compliance through educational outreach (entrance conferences, training seminars, and educational conferences) for all filings, registrations, and activity requirements mandated by the Act.

#### REPORTS ANALYSIS AND AUDIT DIVISION

The Reports Analysis and Audit Division (RAAD) is responsible for performing audit analysis and reviews 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 Desk Audit reviews. The Division conducts periodic field audits, and compiles statistical reports and summaries on 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 activities and financial operations of the Constituent Service and Statehood Fund Programs, candidates, political committees, political action committees, independent expenditure committees, and all others required to file with the Agency.

## PUBLIC INFORMATION AND RECORDS MANAGEMENT DIVISION

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, data entry and imaging of thousands of document pages for the public record; 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.

## DIVISION INTERRELATIONSHIPS

There is no pre-eminent program in the Office of Campaign Finance, because each program relates to the other in executing the mission of the Agency. Reports and Statements are received and processed by the Public Information and Records Management Division (PIRM) and prepared for public view. These reports are forwarded to the Reports Analysis and Audit Division (RAAD) for the analysis of financial and other reported information. The PIRM and RAAD Divisions generate reports to review information entered, and to list filers who have not filed. This procedure initiates the enforcement process.

The PIRM and RAAD Divisions issue Non-Compliance Failure to File (FTF) and Audit Finding letters, respectively, to filers who have failed to file reports or statements, or have filed incomplete information. If compliance is not achieved within a specified timeframe, referral is made to the Office of the General Counsel (OGC) for legal action. The OGC reviews each case and initiates the informal hearing process, which requires the Director's signature and approval.

## **FISCAL YEAR 2014 ACTIVITY**

### **OVERVIEW**

During Fiscal Year 2014 (FY14), the expenditures for the Office of Campaign Finance were associated with core mission and support functions directly related to monitoring, reviewing, and enforcement responsibilities for the candidates and political committees who participated in the April 1, 2014 Primary Election for the Offices of the Mayor, and the Chairman, At-Large (2) and Ward (1,3,5,and 6) Members of the Council of the District of Columbia; and the July 15, 2014 Special Election for the Ward 8 Member of the State Board of Education. There were a minimum of thirteen (13) filing deadlines associated with these Elections, and the ongoing statutory deadlines for the filing of financial reports quarterly by the Constituent Service and Statehood Fund Programs. In fulfilling its responsibilities, the Office of Campaign Finance maintained the full range of mandatory operations in the areas of public information services, legal counsel and adjudication, auditing, and Agency administration. The Agency Summary of FY14 Expenditures and Budget is attached.

Of significance during FY14, the Office of Campaign Finance developed and held, commencing in October 2013, for the first time, Entrance Conferences for newly registered candidates and the treasurers of committees to foster voluntary compliance with the Campaign Finance Act; introduced on January 16, 2014, the OCF Facebook Page as an educational tool through which informational notices are posted on a daily basis; and on August 27, 2014, enhanced the OCF Web Site to report summary contribution and expenditure information from the Constituent Service and Statehood Fund Programs.

### **Enforcement Program**

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, 2013 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.

During FY14, the Agency issued 232 Notices of Hearings (includes 160 initial and 72 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 101 informal hearings; issued 161 Orders of the Director; and completed two (2) investigations on complaints internally generated and filed by members of the public. The Office of Campaign Finance also received twelve (12) informal complaints of alleged violations of the reporting requirements associated with the 2014 Election Cycle. These complaints were addressed immediately through either the issuance of Orders to Show Cause to the offending party or by email communication.

On the statutory deadlines during FY14, the Public Information and Records Management Division (PIRM) referred one hundred and nine (109) political committees for the failure to file or timely file the Report of Receipts and Expenditures, due either October 10<sup>th</sup>, December 10<sup>th</sup>, January 31<sup>st</sup>, March 10<sup>th</sup>, the 8 Day Pre-Primary April 1, 2014 Election Report, June 10<sup>th</sup>, the 8 Day Pre-Special July 15, 2014 Election Report, July 31<sup>st</sup>, or August 10<sup>th</sup>. The PIRM Division withdrew ten (10) referrals where compliance was subsequently determined.

In addition, the Reports Analysis and Audit Division (RAAD) referred sixty-two (62) reporting entities to the Office of the General Counsel for failure to comply with Requests for Additional Information issued by the Audit Division. RAAD withdrew six (6) referrals upon compliance with the Audit Request, and the OGC scheduled the remaining matters for informal hearings.

Following the informal hearing process, one hundred and sixty-one (161) Orders were issued in 118 failures to timely file cases, 41 failures to respond to audit requests for information, and two (2) investigative matters. Fines were imposed in the total amount of \$51,080.00 in forty-eight (48) of these cases, and the remaining one hundred and thirteen (113) cases were either dismissed, or the Notice of Hearing withdrawn or the imposition of a fine suspended based upon the record before the Hearing Officer.

Overall, the fines were paid in full (\$6,516.33) in nine (9) cases, or vacated or reduced (\$12,340.00) in thirteen (13) matters upon motions for reconsideration. Where fines are not paid within the period provided by the Order of the Director, the Office of



Campaign Finance initiates enforcement proceedings before the Board of Elections to pursue the collection of outstanding fines. The Office of Campaign Finance filed a total of nineteen (19) Petitions before the Board on February 28, 2014, June 26, 2014 and October 30, 2014 for the enforcement of the payment of outstanding fines in the total sum of \$21,550.00. These cases were scheduled for Pre-Hearing Conferences on October 6, 2014 and December 18, 2014. Of the 19 cases referred, two (2) cases were withdrawn, two (2) cases were settled for reduced fines, three (3) cases are connected to pending litigation in the Superior Court of the District of Columbia (the Superior Court), one (1) case was referred to the Office of the United States Attorney for the District of Columbia, four (4) matters were certified by the Board for the initiation of enforcement actions in the Superior Court, and the seven (7) remaining matters are pending before the Board due to an inability to perfect service. Fines in the total sum of \$10,593.67 imposed in an additional seven (7) cases during the latter part of FY 2014 were not ripe for transmission to the Board for enforcement until November 2014. These cases are pending further proceedings before the Board.

Because of the demonstrated ability of the Agency to consistently monitor and enforce reporting requirements, compliance with reporting deadlines has substantially increased in general for all programs administered. In most instances, irregularities were resolved before the next filing deadline in accordance with OCF Standard Operating Procedures. During FY 2014, a 100 % filing rate was achieved in the Constituent Service and Statehood Fund Programs; a 97% filing rate was achieved in campaign finance disclosure based on the actual filings by principal campaign committees and political action committees; and a 100% filing rate was achieved by exploratory committees based on the actual filings of these committees.

More specifically, 57 of the 57 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; 710 of the required 751 principal campaign committees and political action committees filed the Report of Receipts and Expenditures (OCF Form 16); and 12 of the required 12 Exploratory Committees filed the Report of Receipts and Expenditures (OCF Form 16).

Overall, in FY 2014, there were 820 required filers in all of the Campaign Finance Programs: 715 timely filers; 64 late filers; and approximately 41 filers who remain delinquent. The total number of actual filers represents 95% of the total required filers who complied with the reporting requirements during Fiscal Year 2014.

## The Audit Program

During Fiscal Year 2014, the Office of Campaign Finance conducted 1028 (includes Amended Reports) Desk Reviews of all Reports of Receipts and Expenditures filed with the Agency by candidates, committees, and Constituent Service and Statehood Fund Programs. All Desk Reviews were completed before the next reporting period of the respective entity.

The Desk Reviews of the Reports of Receipts and Expenditures ensured that the public record provided a full and accurate portrayal of the financial operations and activities of campaigns, and Constituent Service and Statehood Fund Programs. The Desk Reviews resulted in the issuance of 352 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. 242 reporting entities complied with the request of the Audit Division, and submitted the necessary information. Forty-eight (48) responses were due in FY 2015, and the information has been received. As stated previously, the Audit Division referred sixty-two (62) cases 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-nine (39) political committees, following the review and approval of their Final Report of Receipts and Expenditures.

The Audit Branch initiated a total of twenty-six (26) periodic random and full field audits, and recommended the issuance of twenty-three (23) Audit Reports, including seven (7) reports of audits initiated in FY 2013. Ten (10) audits remained open at the close of the Fiscal Year, and seven (7) of these were closed on or before January 23, 2015 upon the issuance of the Audit Report. Specifically, the Office of the Director approved one (1) Investigatory Audit Report concerning the operations of a Constituent Service Program; and two (2) Audit Reports of newly elected officials.

The twenty (20) Periodic Audit Reports were issued following the conduct of periodic random audits of the October 1, 2013 (2) and the April 1, 2014 (3) Reports of Receipts and Expenditures filed in the Constituent Service Programs; the filing of the July 31, 2013 (6) and the January 31, 2014 (4) and Reports of Receipts and Expenditures by continuing political committees; the filing of the October 10, 2013 (3), March 10, 2014 (1), and June 10, 2014 (1) Reports of Receipts and Expenditures by principal campaign committees active in the 2014 Election Cycle.

The selection of a financial report for periodic audit requires the affected reporting entity 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. The conduct of random periodic audits ensures that reporting entities understand the reporting requirements of the Campaign Finance Act, and promotes future compliance.

### Agency Special Projects, Outreach and Public Disclosure

The Office of Campaign Finance initiated and completed several projects during FY 2014 which were designed to increase the public's understanding of, and compliance with the Campaign Finance Act of 2011; improve the overall operations of the Agency; and afford greater access to campaign finance data.

First, as you know, funds provided in the FY 2013 Budget for the Agency supported the increase of the OCF FTEs, from 16 to 31 Full Time Equivalents (FTEs). The fifteen (15) new continuing full time positions (5 Legal and 10 Audit positions) were allocated to the Audit and Legal Divisions. Formerly, the Audit Division was assigned four Continuing FTEs, and the Legal Division was assigned three Continuing FTEs. As of this date, there are three vacant positions in the Office of Campaign Finance, one (1) Legal Position (the Paralegal Specialist, DS-9), and two (2) Audit positions (the Auditor, DS-11 and DS-12). Without question, the increased staffing levels have enabled the Office of Campaign Finance to keep pace with a growing workload generated by the dramatic increase in the number of election complaints received by the Office, the complexity of the funding mechanisms used to support campaigns, and the increase in candidates and committees participating in the election process, and in reported receipts and expenditures.

During FY 2014, the increased staffing levels supported the expansion of the Audit Program to incorporate the random audit of active principal campaign committees during the election cycle for the public office sought, and the full field audit of the principal campaign committee of newly elected public officials. For the first time, the OCF initiated eleven (11) periodic random audits of principal campaign committees active during the 2014 election cycle, and two (2) full field audits of the principal campaign committees of newly elected candidates to public office. The field audit of principal campaign committees active during an election cycle permits the Office of

Campaign Finance to timely track and verify reported campaign activity; to identify apparent violations or to question transactions; and to require the committee to respond to audit findings and correct the public record. The public interest is better served by ensuring that the financial report represents an accurate and complete portrayal of campaign operations upon which it can rely to make educated, informed decisions in the election process.

Once again, the increased staffing strengthened the ability of the Agency to be proactive in the administration and enforcement of the Campaign Finance Act. During the 2014 Election Cycle, the Office of Campaign Finance organized the conduct of site visits at the Early Voting Centers and Election Precincts operated by the Board of Elections, and to the campaign offices of candidates. 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 be engaged in activity which may run afoul of the Campaign Finance Laws; and to initiate enforcement actions where there is noncompliance.

The Office of Campaign Finance dispatched staff to visit 76 Election Precincts located throughout the 8 Wards during the April 1, 2014 City-Wide Primary Election, and to three (3) Early Voting Centers prior to the Primary Election. During the July 15, 2014 Special Election for At Large Member of the State Board of Education, the OCF staff visited the ten (10) Election Precincts located within Ward 8 on Election Day, and visited the two (2) Early Voting Centers in the Ward before the Election. The OCF staff visited during February and March of 2014, the campaign offices of seven (7) candidates for elective office.

Overall, 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 posters.

Second, the Director is authorized to require the electronic filing of campaign finance reports. See D.C. Official Code Section 1-1163-03 (a) (1) (2001 Edition, as amended).

As a consequence, the Office of Campaign Finance was granted funding in its Fiscal Year 2001 Budget and subsequent Budgets for the development, maintenance, and upgrades of a comprehensive electronic filing and disclosure system, with the ability to receive, store, and provide the public with disclosure data, and for the redesign of the OCF Website to accommodate online filing.

The OCF Electronic Filing and Disclosure System (EFs) allows reporting entities to navigate the OCF Website and file reports online in a secure password protected environment. The EFs supports the online updating of the database automatically from reports collected electronically, and extends the interface and capability for OCF staff to enter data from filers who submit paper based filings, thus providing a single user interface updating a single database. More importantly, the EFs provides for the disclosure of information for query on the World Wide Web and for agency audit. All reporting entities (except Advisory Neighborhood Commission (ANC) Candidates), were able to electronically file their respective financial forms at the Website commencing in FY03. ANC candidates were able to electronically file, for the first time, the ANC Summary Financial Report in January 2011.

On January 31, 2015, the provisions of the “Campaign Finance Reform and Transparency Amendment Act of 2013” will mandate electronic filing for all filer types except where hardship is demonstrated in meeting this requirement. Overall in FY 2014, 630 of 715 (88%) reporting entities electronically filed their financial reports. Paper reports were submitted by 86 reporting entities. Specifically, 57 of the 57 timely filings (100%) (100% in FY13) in the Constituent Service and the Statehood Fund Programs were electronically filed; 564 of the 647 timely filings (87%) (84% in FY13) by political committees were electronically filed; and 9 of the 9 timely filings (100%) by Exploratory Committees were electronically filed.

To enhance the OCF Electronic Filing and Disclosure System, the Office of Campaign Finance has introduced several System Upgrades 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 automated forms for the registration, online filing and report modules designed and developed in FY 2013 for the Exploratory and the new Transition, Inaugural, and Legal Defense Committees were made available at the OCF Web Site in FY 2014. A

total of twelve (12) Exploratory Committees registered with the Office of Campaign Finance, and nine (9) electronically filed their financial reports at the OCF Web Site. The registration data for the exploratory committees was available at the web site registration search feature, and the R & E Reports were available in real time once received online. To promote online filing by the newly established committees, the Agency developed Educational Brochures for the Exploratory, Transition, Inaugural, and Legal Defense Committees, which were published at the OCF Web Site on January 27, 2014 and on September 30, 2014. The agenda for the onsite Training Seminars scheduled on October 9, 2014, November 13, 2014, and December 11, 2014 were dedicated to educate the public about the reporting requirements for the new committees and the availability of the e-filing system to file their financial reports.

On August 27, 2014, the Agency introduced the upgrade and modification of the contribution and expenditure modules of the Electronic Filing System to capture and report summary information at the Web Site from the Reports of Receipts and Expenditures of the Constituent Service (OCF Form 10) and the Statehood Fund Programs (OCF Form 28). The Reports sort the contributions received by the Programs by donor type and donation size, and the expenditures by purpose. Graphs are used to illustrate the percentages of contributions received by contributor type and amount, and expenditures by transaction type.

To fully implement the provisions of D.C. Law 20-79, applicable January 31, 2015, the Office of Campaign Finance requisitioned in July 2014, services for the upgrade of the OCF E-Filing System to support the technical requirements of the Act including the availability of the Database via bulk download from the portal web site; the upgrade of the biennial report module to report the contribution and expenditure information of candidates for the Office of Attorney General, political action and independent expenditure committees, and political committees, to include the inaugural, transition, exploratory, legal defense, and ballot measure committees; the registration and e-filing of the financial reports of political action committees, and independent expenditure committees, with additional disclosures in the statement of organization for political committees; the increased disclosure on Schedule A of the Report of Receipts and Expenditures (R & E Report) of information pertaining to the affiliated entities of business contributors; increased disclosures on Schedule B of the R & E Report for expenditures made by each political action committee and by each independent expenditure committee; the modification of the oaths or affirmations of the R & E Reports by committees to include new certifications; the development of a new

schedule on the R & E Report to report bundled contributions in excess of \$10,000; and the development of an e-filing application to report independent expenditures exceeding \$50 made to other than a committee or candidate by any person (other than a committee).

To aid in the assessment of the OCF Electronic Filing and Report System, and the Web Site, the Office of Campaign Finance launched in FY 2013, the online Website Survey, which closed on January 15, 2013. A total of seventy (70) visitors participated in the Survey. The Survey Analysis Report found that most users were satisfied with the site information and services, while some users experienced difficulty navigating the site, locating services, and with browser compatibility. Since June 2013, the OCF has worked with the Office of the Chief Technology Officer to redesign the OCF homepage layout and navigation scheme, which will incorporate a smart search function. The redesign will require the migration of the OCF database content and EFs applications to the new DC.Gov Drupal content management system. During FY 2014, the Agency enlisted the services of a vendor to assist with the redesign, rebuild, and integration of the EFs applications to the new DC.Gov Drupal platform. The EFs applications have been redesigned and are ready for migration. The new website design and navigational scheme is near completion. The expected launch date will occur in FY 2015.

The enhancements maximized the ability of the Office of Campaign Finance to elicit and receive comments from members of the public concerning the effectiveness of the operations of the Agency, and to present and disseminate information to the public.

Third, in furtherance of our objective to promote voluntary compliance with the Campaign Finance Laws through educational outreach, and to promote public disclosure, the Office of Campaign Finance utilizes its Web Site to reach the broadest audience. The OCF Web Site is the main portal for information dissemination and serves as the main interface for the filer and the public with the Electronic Filing and Reporting System.

To ensure its effectiveness, the Office of Campaign Finance constantly monitors the Web Site to review the currency of the published information, and explores new and expanded ways of communicating with the public at the site.

On January 27, 2014, the OCF introduced at the Web Site for use in the 2014 Election Cycle, the newly revised Campaign Finance Guide and the Educational Brochures for the Political Action, Exploratory, and Ballot Measure Committees, the Constituent Service and Statehood Fund Programs, and the ANC candidates. 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. On September 30, 2014, the new Brochures for the Inaugural, Transition, and Legal Defense Fund Committees were presented at the OCF Web Site.

On January 16, 2014, the OCF Face Book Page was introduced to further extend public outreach. Notice of the Face Book Page was posted at the OCF Website with an icon provided to select and connect with the Page. The Page is used as an educational tool and to provide the community daily brief postings of pertinent information including upcoming filing and training dates, the release of orders, audits, and regulations, the availability of financial reports and summary contribution and expenditure data, and job opportunities at the OCF. 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.

On May 21, 2014, a hyperlink was posted at the Face Book Page to the OCF Website Feature, the Geographical Contribution Locator, from which to view the most recent tally of contribution amounts for active candidates by District Zip Code.

The OCF Web Site offers visitors a variety of instantly accessible resources, including the contribution and expenditure search feature where data received by OCF may be retrieved after the latest reporting period; the data base download; the online Training and Educational Brochures; the OCF Regulations and Interpretative Opinions; the Orders of the Director issued in resolution of enforcement and investigative matters initiated on non-compliance with the reporting requirements, and complaints alleging violations of the Campaign Finance Act; Audit Analysis; downloadable Forms; and the email subscription service.

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; filing deadlines; and OCF news. As of September 30, 2014, 220 new members of the public elected to use



the service (883 total subscribers). The Office of the General Counsel continues to maintain the email address, [www.ocf.gc@dc.gov](mailto:www.ocf.gc@dc.gov), to respond to inquiries concerning pending enforcement matters.

Following the close of each statutory filing deadline, the OCF published Financial Reports at the Web Site summarizing the contribution and expenditure information from the Reports of Receipts and Expenditures filed by candidates and political committees. The Financial Reports sort contributions by donor type and donation size, and expenditures by purpose. Graphs were posted to illustrate the percentages of contributions received by contributor type and amount, and expenditures by transaction type. The Office of Campaign Finance made public disclosure at the Web Site of the 779 financial reports and statements filed with the Agency, whether electronically or by paper based filings, through the Imaging Search Feature for each reporting period. The Web Site was also regularly updated with public service notices and news releases.

Fourth, the Office of Campaign Finance continued to place a strong organizational focus on achieving voluntary compliance through educational outreach. In October 2013, the Office of Campaign Finance for the first time held Entrance Conferences for newly registered candidates and political committees. The Entrance Conference is designed to foster compliance with the Campaign Finance laws. The conferences were coordinated by the Office of the General Counsel, and supported by staff from the Audit and Public Information Divisions. The conferences were held on October 17, 2013, November 14, 2013, January 23, 2014, April 24, 2014, and July 11, 2014. The names of the 52 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 scheduled during FY14 for candidates, political committees, and any other interested parties who participated in the 2014 Election Cycle. Training was also made available 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 on January 16, 2014 and continued through December 11, 2014. Notice of the Scheduled Training was accomplished through publication of the Notice at the OCF Web Site on January 14, 2014, distribution through the mailing of reminder letters to reporting entities, and posting in the Public Information Division of the

Agency. To evaluate the effectiveness of the educational seminars, the OCF circulates surveys at the conclusion of each session to determine whether the presentations achieved acceptable satisfaction ratings. Of nine (9) completed user surveys, the seminars were rated overall “Excellent” by seven (7) respondents, and “Good” by two (2) respondents.

In an effort to further expand the OCF Educational Program, the Agency commenced the review of the online/interactive training modules of more than sixteen (16) state campaign finance websites to assist with recommendations for the development and upgrade of the OCF training modules. In our view, the interactive presentations of short duration which allowed the user to test their knowledge of the information conveyed were the most effective.

The Office of Campaign Finance made itself available for outside training to various public organizations on the reporting requirements of the new Campaign Finance Act of 2011, and the overall changes in the campaign finance, financial disclosure, and conflict of interest laws.

In FY 2014, the Agency did not receive requests for Interpretative Opinions. The OCF did receive fifteen (15) requests for expedited advice pertaining to the 2014 Election Cycle. Because of time constraints, the requests were not treated as requests for interpretative opinions, although advice was sought concerning the application of the campaign finance laws.

Under the Pre-Notification and Failure to File Programs, the Agency issued 1126 pre-notification letters to the filing community concerning the upcoming reporting deadlines, and 57 delinquency letters to reporting entities who failed to timely file, or to file their financial reports.

As the result of these endeavors to better inform the public of their responsibilities under the Campaign Finance Act, the Office of Campaign Finance continues to experience a clear increase in the regularity and overall quality of the Financial Reports filed with the Agency.

Lastly, consistent with the statutory duty of the Director to make the financial reports filed with the Office of Campaign Finance available for public inspection, the Agency continues to make full public disclosure of Campaign Finance data to both the

regulated community and the general public by providing public access to financial reports within its statutorily mandated timeframe of 48 hours of receipt. This is accomplished through the imaging system, where digital images produced of the scanned reports and electronically received reports may be retrieved at the OCF imaging station. Final orders issued in investigative matters, interpretative opinions, and notices of proposed rulemaking are also routinely made available to the public.

