

**Responses to Performance Oversight Pre-Hearing Questions:  
Office of Campaign Finance  
February 13, 2019**

**GENERAL QUESTIONS**

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

**RESPONSE:**

The Office of Campaign Finance (OCF) is organized into four 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); the Public Information and Records Management Division (PIRM); and the Fair Elections Program Division (FEP). The current Organizational Structure and Staffing Chart (February 2019), and Organizational Charts for each OCF Division (February 2019) (**Attachment A**) are attached. The Office of Campaign Finance Functional Organization Chart (February 2019) is attached, and provides a breakdown of the responsibilities of each OCF Division. **See Attachment B.** The OCF currently has thirty-five (35) continuing full time positions.

- a. Please provide an explanation of the roles and responsibilities of each division and subdivision.**

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, and for the administration of the Fair Elections Amendment Act of 2018, D.C. Law 22-94, effective May 5, 2018, and applicable November 7, 2018. The Director establishes policy and institutes clear directives to ensure the reasonable enforcement and administration of the Campaign Finance Laws.

The Office of the Director issues interpretative opinions; initiates investigations and informal hearings on violations of the Campaign Finance Act, as amended, 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, managing

the Fair Elections Fund, procurement, personnel, and overseeing the administration of the OCF Web Site, the Electronic Filing and Disclosure System, and the preparation of post - election reports, including the Biennial Report and the overview of the Fair Elections Program.

By way of background, the “Fair Elections Amendment Act of 2018” (the “Fair Elections Act”) dramatically changes the mode of financing campaign operations in the District of Columbia by offering candidates for elective office, with the exception of candidates for the Office of Member of an Advisory Neighborhood Commission, the opportunity to qualify for the public funding of their political campaigns. The Fair Elections Act establishes the Fair Elections Program (the “Program”) within the Office of Campaign Finance and charges the Agency with the responsibility to administer the laws and regulations governing the Program; to promulgate procedures to govern the audit and verification of qualified small dollar contributions for compliance with the requirements of the Program; to authorize the payment of base amount and matching payments from the Fair Elections Fund, and to oversee the remission of funds; and to review and evaluate the Program following each election cycle, and submit reports to the Mayor, the Council, and to the public concerning the status of the Program and its effect on campaigns. The Fair Elections Fund is a special non-lapsing fund created for use solely for the distribution of payments to candidates who qualify to participate in the Program, and administering the Fair Elections Program.

The Fair Elections Program is voluntary, and prescribes distinct contribution limits, expenditure prohibitions, and reporting requirements. The regulation of the financial operations of those candidates, who do not elect to participate in the Program, will remain subject to the existing reporting requirements of the Campaign Finance Act.

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, as amended. 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 in the traditional Campaign Finance Program. 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, and political committees in the traditional Campaign Finance Program; and political action committees and independent expenditure committees.

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.

The Fair Elections Program Division is responsible for the verification of the contribution reports and other documents received in the Office from candidates participating in the Fair Elections Program or seeking certification in the Program. The Division makes recommendations for the certification of candidates into the Fair Elections Program and the authorization of Base Amount and Matching Payments; initiates referrals to the OGC for non-compliance actions and responds to appeals from Agency actions before the Board of Elections; conducts full field audits of the campaign operations of participating candidates at the submission of their final financial report; coordinates educational outreach for participating candidates and candidates seeking certification, and the public; coordinates the Debate Program; collects data from financial reports for post-election reports; and manages the remission of funds and equipment.

**b. Please provide a narrative explanation of any changes to the organizational chart made during the previous year.**

First, to distinguish the public funding program from the private funding program, the Office of Campaign Finance determined that the responsibilities of the Agency associated with the certification of candidates to participate in the Program, and the management of the Elections Fund, warranted the organization of a Division solely dedicated to the Fair Elections Program. Hence, the Office of Campaign Finance was reorganized by Administrative Issuance No. 2018-01, to establish the Fair Elections Program Division, effective December 14, 2018.

The FY 2019 Budget for the Agency supports the organization of the Fair Elections Program Division within the Office of Campaign Finance. The FY 2019 Budget includes an enhancement for the implementation of the Fair Elections Program in the amount of \$860,000 for administrative costs associated with the procurement of services for the design and development of an online financial reporting system unique to the pre-certification and post certification accounting mandated by the Fair Elections Act, the creation of a parallel filing system to segregate the publicly financed candidate committees from those committees which remain in the traditional financing program, the overhaul of the OCF Website to include information about the program, increases in the personal services budget to fund three (3.0) Full-Time Equivalent (FTEs) Auditor positions, and to support primary and general election financing for the 2020 Election Cycle. In addition, to further support the Fair Elections Program, a personal services increase of \$260,558 was identified for two (2.0) Full-Time Equivalents (FTEs): a Fair Elections Program Manager, who can oversee the Program, and serve as a point person for community engagement; and a Chief Technology Officer, who can oversee the technological aspects of the Program. The title of the Chief Technology Officer Position was changed by the Department of Human Resources during the Classification of the Position to Information Technology Specialist.

To further ensure the success of the Program, two (2.0 FTEs) Auditor Positions from the Reports Analysis and Audit Division, and one (1.0 FTE) Attorney Advisor Position from the Office of the General Counsel have been reassigned to the Fair Elections Program Division. It is anticipated that the participation of candidates and committees in the traditional Campaign Finance Program will diminish once the Fair Elections Program is introduced and made available to the public. Therefore, the changes in the staffing levels will not affect the production of either Division.

The staffing level of the Reports Analysis and Audit Division decreased from thirteen (13 FTEs) Auditor Positions to eleven (11) Positions; and the staffing level of the Office of the General Counsel decreased from seven (7.0 FTEs) to six (6.0 FTEs) Positions, the General Counsel, two (2.0 FTEs) Attorney Advisor Positions (LS-12), two (2.0 FTEs) Hearing Examiners (CS-11), and one (1.0 FTE) Investigator Position (CS-09). The reassigned Attorney Advisor LS-13 Position will serve as the primary liaison between the Office of Campaign Finance and candidates, treasurers, their staff, and the public, and provide one on one guidance on matters concerning the Fair Elections Program; will assist the Fair Elections Manager and the OCF RAAD and PIRM Managers with the interpretation and application of the Fair Elections Act and its implementing Regulations; will work with the Office of the General Counsel to address violations of the reporting requirements; and will assist the Fair Elections Program Manager and the Training Officer with the conduct of trainings for candidates, treasurers, and the general public, and with projects related to community outreach and the revision of training materials and online content on the recordkeeping and reporting requirements. It should be noted that notwithstanding the reassignment of positions from the Audit and Legal Divisions, all staff will be cross trained to enable the performance of responsibilities under the Fair Elections Act, as needed.

Second, under the former OCF structure, the responsibilities of the RAAD Division were established in three Units: the Reports Analysis Unit which conducts Desk Reviews of all financial reports; the Audit Unit which conducts Periodic Audits in each filer group, Full Field Audits of newly elected public officials, and Investigative Audits; and the Research Unit which was responsible for research and data collection. The Realignment of the RAAD Division eliminated the Research Unit, which no longer served a critical purpose based on recent changes in the Campaign Finance Laws and the operating procedures of the Agency. D.C. Law 20-79, the “Campaign Finance Reform and Transparency Act of 2013”, effective February 22, 2014, and made applicable January 31, 2015, requires a business entity to share the contribution limits with its affiliated entities. A business entity which makes a contribution must disclose the identity of their related entities for reporting on the Report of Receipts and Expenditures. Subsequent to the enactment of these revisions to the Campaign Finance Act, the Standard Operating Procedures of the Office of the General Counsel and the Public Information Records Management Division were revised to incorporate a process for the review of business contributions to better monitor compliance with the Act. The degree to which the Office of

Campaign Finance utilizes its Audit Branch to research the relationships of business contributors in the first instance was minimized. Following each filing deadline for the submission of Reports of Receipts and Expenditures, the PIRM Division generates and forwards to the OGC a sampling of the data of at least fifty (50) business contributors for review and verification of any associated affiliated entities. The Office of the General Counsel conducts a review of the business contributions to verify through various research tools that the contribution does not exceed the contribution limitations. Where the failure to disclose affiliated entities occurs, the Office of the General Counsel must then undertake the research necessary to identify the business relationships and make a determination as to whether the contribution limits have been exceeded. Therefore, the resources of the Audit Division are better utilized through the reassignment of the positions formerly assigned to the Research Unit between the Reports Analysis Unit and the Audit Unit.

- 2. Please provide a current Schedule A for the agency which identifies each position by program and activity codes, with the employee's name, title/position, salary, fringe benefits, and length of time with the agency. Please note the date the information was collected. The Schedule A should also indicate if the position is continuing/term/temporary/contract or if it is vacant or frozen. Please separate salary and fringe and indicate whether the position must be filled to comply with federal or local law.**

**RESPONSE:**

The complete and current Schedule A for the Office of Campaign Finance is attached. The Schedule A identifies each position by program and activity, with the employee's name, title/position, salary, fringe benefits, including the specific grade, series, and step of position, and length of time with the Agency; whether the position held is continuing/term/temporary/contract, or vacant and/or frozen; and whether the position must be filled to comply with federal or local law. **See Attachment C.**

- 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 18, and FY 19, to date, the Office of Campaign Finance did not detail any employees from the Agency, nor were employees detailed to the Agency.

**4. Please provide the Committee with:**

- a. 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 collisions involving the agency's vehicles in FY18 and FY19, to date; and**

**RESPONSE:**

The Agency has one (1) Vehicle, a 2018 Toyota Corolla Sedan. The Vehicle is assigned to Nadine Journiette, the Administrative Officer, and to April Williams, the Administrative Assistant. The Vehicle is used exclusively for government business. The Vehicle was not involved in any collisions in FY18, or FY19 to date. During FY18, and FY19, to date, the Office of Campaign Finance entered into a lease agreement for the vehicle (Toyota Corolla Sedan) with the Department of Public Works at an annual cost of \$4,618.00.

- a. A list of travel expenses, arranged by employee for FY18 and FY19, to date, including the justification for travel.**

**RESPONSE:**

The list of travel expenses arranged by employee for FY18 and FY19, to date, including the justification for the travel is attached. **See Attachment D.**

- 5. For FY18 and FY19, to date, please list all intra-District transfers to or from the agency and the purpose for each transfer.**

**RESPONSE:**

The intra-District transfers received by or transferred from the Agency during FY18 and FY19, to date, are reported in the attached Chart of Intra-District and MOU Transfers. **See Attachment E.**

- 6. For FY18 and FY19, 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:**
  - a. The revenue source name and code;**
  - b. The source of funding;**
  - c. A description of the program that generates the funds;**
  - d. The amount of funds generated by each source or program;**
  - e. Expenditures of funds, including the purpose of each expenditure; and**
  - f. 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 FY18, and FY19, to date.

- 7. For FY18 and FY19, 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 by the Agency is attached with the name of the employee making each expenditure, and the general purpose for each expenditure for FY18 and FY19, to date. **See Attachment F.**

- 8. Please list all memoranda of understanding (MOU) entered into by your agency during FY18 and FY19, 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 FY18 and FY19, to date, is attached with the requested information. **See Attachment E.**

- 9. Please summarize and provide the status of all existing capital projects and those in the financial plan, including a brief description, the amount budgeted by fiscal year, actual dollars spent, and any remaining balances (by type of funds). In addition, please provide:**
  - a. An update on all capital projects concluded in FY17, FY18, and FY19, to date, including the amount budgeted, actual dollars spent, any remaining balances, and whether the project had 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 FY17, FY18, and FY19, to date.

- 10. Please provide a list of all budget enhancement requests (including capital improvement needs), for FY18 and FY19, to date. For each, include a description of the need, the amount of funding requested, and whether the request was approved or denied.**

**RESPONSE:**

The Office of Campaign Finance did not present budget enhancement requests for FY18. In FY19, to date, the Agency requested the following enhancements which are pending:

- (1) The Fair Elections E-Filing and Disclosure System: Amount required + \$387,981.81; for the design and development of the E-Filing and Disclosure System required under the Fair Elections Act to receive financial reports online.**



- (2) Expanded Educational Outreach (Public Service Announcements, Videos, and Postcard/Postage Mailers) for the Fair Elections Program: Amount required + \$40,000; to fully inform District Residents about the Fair Elections Program and any scheduled Debates of candidates.
- (3) Team Mate Auditing Software Application: Amount required + \$75,000 first contract year and \$35,000 for the next two years; recommended by the Inspector General in OIG, Project No. 18-1-04CJ, the Evaluation of the OCF Reports and Analysis and Audit Division.
- (4) Overtime of OCF Staff to support the ANC Outreach for the Fair Elections Program: Amount required + \$21,777.60; to present at ANC Meetings for a five (5) month period twice weekly to inform District Residents about the Fair Elections Program.
- (5) OCF E-Filing and Disclosure System Upgrades required by D.C. Act 22-107, "the Campaign Finance Reform Amendment Act of 2018." Amount required + \$100,000; to upgrade the System to fully implement the new reporting requirements of the Act.
- (6) New FTE's (one (1) Auditor, CS-11, Step 1, \$59,727; one (1) Attorney, LS-12, Step 1, \$84,000; and one (1) Information Technology Specialist, CS-11, Step 1, \$59,727: Amount required + \$203,454; the new positions will be required to fully execute the additional responsibilities of OCF under D.C. Act 22-107, the "Campaign Finance Reform Amendment Act of 2018."

More specifically, the FY 2019 OCF Budget includes an enhancement for the implementation of the Fair Elections Program in the amount of \$860,000 for administrative costs associated with the procurement of services for the design and development of an online financial reporting system unique to the pre-certification and post certification accounting mandated by the Fair Elections Act, the creation of a parallel filing system to segregate the publicly financed candidate committees from those committees which remain in the traditional financing program, the overhaul of the OCF Website to include information about the program (\$62,000.00); increases in the personal services budget to fund three (3.0) Full-Time Equivalents (FTEs) Auditor Positions (\$248,000.00); and to support primary and general election financing for the 2020 Election Cycle (\$550,000.00). In addition, to further support the Fair Elections Program, a personal services increase of \$260,558 was identified for two (2.0) Full-Time Equivalents (FTEs): a Fair Elections Program Manager, who can oversee the Program, and serve as a point person for community engagement; and a Chief Technology Officer, who can oversee the technological aspects of the Program. The title of the Chief Technology Officer Position was changed by the Department of Human Resources during the Classification of the Position to Information Technology Specialist.

The \$62,000.00 allocated in the FY 2019 Budget for the Office of Campaign Finance will not support the funding required to procure the E-Filing System with the specifications deemed critical to the full implementation of the Fair Elections Act, as well as the procurement of other services necessary to educate the public and improve the effectiveness of the OCF Audit Division. The Office of Campaign Finance is responsible for the audit and verification of the financial reports of candidates, both seeking to participate, and certified to participate in the Program. The original estimate of \$62,000.00 for the E-Filing System was submitted during early 2018, when the Fair Elections Act was before the Council for adoption, and was understated. Following the OCF's observation of the online filing and disclosure systems utilized by the New York City Campaign Finance Board (the C-Smart System) and the Maryland State Board of Campaign Finance in their public financing programs, the specifications for the OCF E-Filing System were more accurately defined. As a consequence, the most recent quote is \$387,981.81.

In addition, the OCF Audit Division was the subject of OIG Project No. 18-1-04CJ (September 2018). Although the Office of the Inspector General did not identify deficiencies in the OCF audit processes, the Inspector General recommended that work paper software would improve audit efficiency, and the organization of information and documentation. In this regard, the OCF has reviewed the software application by TeamMate Solutions, which may be procured as a subscription contract for three years (\$75,000 in the first year, and approximately \$35,000 each year thereafter).

The Office of Campaign Finance submits that the procurement of public service announcements, videos, and postcard mailers would expand the scope of its outreach to the public, and more effectively educate the residents of the District of Columbia about the Fair Elections Program (\$40,000 at a minimum based on discussions with the Executive Director of the Board of Elections). The Agency will also partner with the Office of Advisory Neighborhood Commissions to appear on the Meeting Agendas of the 40 Advisory Neighborhood Commissions from April 2019 through August 2019, with a targeted goal to present at two (2) ANC meetings weekly to inform the public about the Fair Elections Public Financing Program. This effort will require the payment of overtime compensation for approximately six (6) OCF staff (one (1) CS-13 Auditor Position, two (2) CS-12 Auditor Positions, one (1) CS-11 Auditor Position, one (1)

CS-09 Auditor Position, and one (1) CS-05 Clerical Assistant Position) during this period for at least three (3) hours for each event.

Last, if D.C. Act 22-107, the “Campaign Finance Reform Amendment Act of 2018”, becomes effective during Fiscal Year 2019, additional upgrades of the OCF E-Filing and Disclosure System will be required to fully implement the amendments to the Campaign Finance Act, at an approximate cost of \$100,000.00, and additional personnel will be necessary to meet the added responsibilities thereunder, one (1) Auditor Position, CS-11, Step 1 (\$59,727.00); one (1) Attorney Position, LS-12, Step 1 (\$84,000.00); and one (1) Information Technology Specialist, CS-11, Step 1 (\$59,727.00).

**11. Please list, in chronological order, every reprogramming in FY18 and FY19, to date, that impacted the agency, including those that moved funds into the agency, out of the agency, and within the agency. For each reprogramming, list the date, amount, program and activity codes, rationale, and reprogramming number.**

**RESPONSE:**

There was one (1) reprogramming in FY18, and none in FY19, to date, at the Agency’s request. The reprogramming moved funds within the Agency, and the revised, final budget for the Agency for FY18 was not affected.

On May 9, 2018 (approved June 13, 2018), the Office of Campaign Finance requested the Reprogramming of \$150,000.00 of Fiscal Year 2018 Local Funds budget authority from Personal Services to Non-Personal Services. Funds were needed to cover the cost of audio visual systems for the Training and Hearing Rooms at the Agency’s new location at 1015 Half Street, S.E.; enhancements for the E-Filing and Disclosure System available at [www.ocf.dc.gov](http://www.ocf.dc.gov); and for 35 new desktop computers. See **Attachment G**, the Chart of FY18 and FY19, to date, Reprogramming.

**1. Please list each grant or sub-grant received or distributed by your agency in FY18 and FY19, to date. List the date, amount, source, purpose of the grant or sub-grant received or distributed, and amount expended.**

**RESPONSE:**

The Office of Campaign Finance did not receive any grant or sub-grant in FY18 and FY19, to date.

- a. **How many FTEs are dependent on grant funding at your agency? 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.

- 13. Please list each contract, procurement, and lease, entered into, extended, and option years exercised, by your agency during FY18 and FY19, 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 amount budgeted and amount 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, and lease, entered into, extended, and option years exercised, by the Office of Campaign Finance during FY18 and FY19, to date, is attached, with the requested information provided for each. **See Attachment H.**

- 14. 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 to significant financial liability or will result in a change in agency practices, and describe 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.

**15. Please list all settlements entered into by the agency or by the District on behalf of the agency in FY18 of FY19, to date, and provide the parties' names, the amount of the settlement, and if related to litigation, the case name and a brief description of the case. If unrelated to litigation, please describe the underlying issue or reason for the settlement (e.g. administrative complaint, etc.).**

**RESPONSE:**

During FY18, to date, the Office of the General Counsel negotiated settlements on behalf of the Office of Campaign Finance in the following administrative matters:

- (1) OCF v. Lee Calhoun (OCF FI-2013-013) – Campaign Contribution Violations. Settled on January 8, 2018 for \$2000.00 in fines and a commitment to refrain from engaging in political activity in the District of Columbia in the future.
- (2) OCF v. Stanley Straughter (OCF FI-2013-014) – Campaign Contribution Violations. Settled on January 8, 2018 for \$2000.00 in fines and a commitment to refrain from engaging in political activity in the District of Columbia in the future.
- (3) OCF v. Jeffrey Thompson (OCF FI-2013-015) – Campaign Contribution Violations. Settled on January 8, 2018 for \$80,000.00 in fines and a commitment to refrain from engaging in certain political activity in the District of Columbia during the 2018 Election Cycle and to consult with the OCF prior to any future engagement in certain political activity.
- (4) OCF v. DC Chamber of Commerce (OCF 17 P-001 & OCF 16P-030) Failure to Timely File Reports of Receipts and Expenditures. The Settlement Agreement provided that the respondent would pay the \$3,950.00 in outstanding fines in seven (7) installments. The respondent made an initial payment of \$1,000.00 on November 22, 2018 and will retire the balance by making (6) six monthly installments of \$491.66 during the following 6 (six) months.
- (5) OCF v. Jacque Paterson (OCF 2015 C087, 2016C 003, 2016C-040, 2017C- -14, 2017C-024) Failure to Timely File Reports of Receipts and Expenditures. The Settlement Agreement provided that the respondent would pay the \$2,500.00 in outstanding fines by making an initial payment of \$500.00 on August 14, 2018 and retire the balance by making monthly payments of \$500.00 each during the subsequent 4 (four) months. However, the respondent failed to make the agreed upon monthly installments. Consequently, the matter was transmitted to the Office of the General Counsel for the Board of Elections (BOE) to file a Petition for Enforcement in the DC Superior Court. The matter is currently pending before the BOE.

**16. Please list the administrative complaints or grievances that the agency received in FY18 and FY19, to date, broken down by source. Please describe any changes to agency policies or procedures that have resulted from complaints or grievances received. For any complaints or grievances that were resolved in FY18 and FY19, to date describe the resolution.**

**RESPONSE:**

The Office of Campaign Finance did receive administrative complaints or grievances in FY18 and FY19, to date, as follows:

- (1) On October 31, 2018, a former employee of the Agency filed an American Disabilities Act Claim against the Agency with the Equal Employment Opportunity Commission, after filing several administrative complaints and grievances on the local level during FY18 and FY19, to date, which were either dismissed or forwarded to the Agency with recommendations.
- (2) A current employee has appealed the action of the Agency in a personnel matter before the Office of Employee Appeals.

Both matters are under administrative review before the respective bodies.

**17. Please list and describe any complaints or allegations of sexual harassment or other forms of sexual misconduct received by the agency in FY18 and FY19, to date, whether or not those complaints or allegations were resolved.**

**RESPONSE:**

The Office of Campaign Finance did not receive any allegations of sexual harassment or misconduct in FY18 and FY19, to date. Notwithstanding, the procedures involved for investigating allegations of sexual harassment or misconduct would commence with the referral of the allegations to the Equal Employment Officer (EEO) for the Agency. The EEO Officer is responsible for ensuring that the Agency adheres to the mandates of the various laws enacted to make certain that a fair and non-discriminatory workplace is provided to all OCF employees. More importantly, the EEO Officer is available to address any EEO concerns the employees of the Agency may have. Consistent with the procedures of the Department of Human Resources, any investigation undertaken would include advising the parties of their right to representation, examining the relevant evidence, conducting interviews, and reviewing the applicable laws and regulations. Following the conclusion of the investigation, the EEO Officer issues a report in which recommendations are made to the Director. After the review of the recommendations, the Director issues a final agency decision which may be appealed to the Office of Employee Appeals.

**18. Please list and describe any ongoing investigations, audits, or reports on or of the agency, or any investigations, studies, audits, or reports on the agency that were completed in FY18 and FY19, to date.**

**RESPONSE:**

By correspondence dated July 21, 2017, the Office of the Inspector General (OIG) advised the Office of Campaign Finance of its intent to commence a review of the OCF's Reports Analysis and Audit Division, focusing on the full field audit processes of the Agency, and certain specific Audit Reports issued by the Agency. The review was completed and is the subject of OIG Project No. 18-1-04CJ (September 2018). Although the Office of the Inspector General did not identify deficiencies in the OCF audit processes, the Inspector General recommended that work paper software would improve audit efficiency, and the organization of information and documentation. In this regard, the OCF has reviewed the software application by TeamMate Solutions, which may be procured as a subscription contract for three years (\$75,000 in the first year, and approximately \$35,000 each year thereafter).

Second, by email dated October 5, 2017, the Draft OCF P-Card Audit Report by the Office of Procurement Integrity & Compliance (OPIC), on behalf of the District's Chief Procurement Officer (CPO), for the period April 21, 2017 through July 20, 2017, was forwarded to the Agency for review. The Responses of the Agency to the two (2) areas of concern were not included, and were brought to the attention of the OPIC by subsequent transmission. The matter remains under review.

With the exception of the above referenced matters, the Agency is unaware of any other 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 18 and FY19, to date.

**19. Please describe any spending pressures the agency experienced in FY18 and any anticipated spending pressures for the remainder of FY19. Include a description of the pressure and the estimated amount. If the spending pressure was in FY18, describe how it was resolved, and if the spending pressure is in FY19, describe any proposed solutions.**

**RESPONSE:**

The Office of Campaign Finance did face spending pressures during FY18, but resolved those issues through the reprogramming of Fiscal Year 2018 Local funds budget authority within the Agency from Personal Services to Non-Personal Services, as more fully described in the Response to Question No. 13. Specifically, the Agency did not have sufficient funds in Non-Personal Services to cover the costs associated with required enhancements to the OCF E-filing and Disclosure System, new audiovisual systems for the Training and Hearing Rooms at the Agency's new location, and the procurement of 35 Dell Computers to replace equipment for which warranties had expired.

The Office of Campaign Finance is facing spending pressures for FY19. The FY 2019 OCF Budget includes an enhancement for the implementation of the Fair Elections Program in the amount of \$860,000 for administrative costs associated with the procurement of services for the design and development of an online financial reporting system unique to the pre-certification and post certification accounting mandated by the Fair Elections Act, the creation of a parallel filing system to segregate the publicly financed candidate committees from those committees which remain in the traditional financing program, the overhaul of the OCF Website to include information about the program (\$62,000.00); increases in the personal services budget to fund three (3.0) Full-Time Equivalents (FTEs) Auditor Positions (\$248,000.00); and to support primary and general election financing for the 2020 Election Cycle (\$550,000.00). In addition, to further support the Fair Elections Program, a personal services increase of \$260,558 was identified for two (2.0) Full-Time Equivalents (FTEs): a Fair Elections Program Manager, who can oversee the Program, and serve as a point person for community engagement; and a Chief Technology Officer, who can oversee the technological aspects of the Program. The title of the Chief Technology Officer Position was changed by the Department of Human Resources during the Classification of the Position to Information Technology Specialist.

Notwithstanding, the \$62,000.00 allocated in the FY 2019 Budget for the Office of Campaign Finance will not support the funding required to procure the E-Filing System with the specifications since deemed critical to the full implementation of the Fair Elections Act, as well as the procurement of other services necessary to educate the public and improve the effectiveness of the OCF Audit Division. The Office of Campaign Finance is responsible for the audit and verification of the financial reports of candidates, both seeking to participate, and



certified to participate in the Program. The original estimate of \$62,000.00 for the E-Filing System was submitted during early 2018, when the Fair Elections Act was before the Council for adoption, and was understated. Following the OCF's observation of the online filing and disclosure systems utilized by the New York City Campaign Finance Board (the C-Smart System) and the Maryland State Board of Campaign Finance in their public financing programs, the specifications for the OCF E-Filing System were more accurately defined. As a consequence, the most recent quote is \$387,981.81.

In addition, as previously noted, the OCF Audit Division was the subject of OIG Project No. 18-1-04CJ (September 2018). Although the Office of the Inspector General did not identify deficiencies in the OCF audit processes, the Inspector General recommended that work paper software would improve audit efficiency, and the organization of information and documentation. In this regard, the OCF has reviewed the software application by TeamMate Solutions, which may be procured as a subscription contract for three years (\$75,000 in the first year, and approximately \$35,000 each year thereafter).

Last, the Office of Campaign Finance submits that the procurement of public service announcements, videos, and postcard mailers would expand the scope of its outreach to the public, and more effectively educate the residents of the District of Columbia about the Fair Elections Program (\$40,000 at a minimum based on discussions with the Executive Director of the Board of Elections). The Agency will also partner with the Office of Advisory Neighborhood Commissions to appear on the Meeting Agendas of the 40 Advisory Neighborhood Commissions from April 2019 through July 2019, with a targeted goal to present at two (2) ANC meetings weekly to inform the public about the Fair Elections Public Financing Program. This effort will require the payment of overtime compensation for approximately six (6) OCF staff (one (1) CS-13 Auditor Position, two (2) CS-12 Auditor Positions, one (1) CS-11 Auditor Position, one (1) CS-09 Auditor Position, and one (1) CS-05 Clerical Assistant Position) during this period for at least three (3) hours for each event.

Second, if D.C. Act 22-107, the "Campaign Finance Reform Amendment Act of 2018", becomes effective during Fiscal Year 2019 (Projected Law Date, March 26, 2019), additional upgrades of the OCF E-Filing and Disclosure System will be required to fully implement the amendments to the Campaign Finance Act, at an approximate cost of \$100,000.00, and additional personnel will

be necessary to meet the added responsibilities thereunder, one (1) Auditor Position, CS-11, Step 1 (\$59,727.00); one (1) Attorney Position, LS-12, Step 1 (\$84,000.00); and one (1) Information Technology Specialist, CS-11, Step 1 (\$59,727.00).

**20. Please provide a copy of the agency's FY18 performance plan. Please explain which performance plan objectives were completed in FY18 and whether they were completed on time and within budget. If they were not, please provide an explanation.**

**RESPONSE:**

The copy of the FY18 Performance Plan and Report for the Office of Campaign Finance is attached. **See Attachment I.** 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 FY19 performance plan as submitted to the Office of the City Administrator.**

**RESPONSE:**

The FY19 Performance Plan for the Office of Campaign Finance is attached as submitted to the Office of the City Administrator. **See Attachment J.**

**22. Please describe any regulations promulgated by the agency in FY18 or FY19, to date, and the status of each.**

**RESPONSE:**

First, the Office of Campaign Finance submitted a Notice of Emergency and Proposed Rulemaking to the Board of Elections, which was adopted by the Board on April 5, 2017 at its regularly scheduled meeting, and published in the D.C. Register on April 21, 2017 (64 DCR 3804). The Notice of Final Rulemaking was adopted by the Board at its regularly scheduled meeting on September 6, 2017, and became effective upon publication in the D.C. Register on October 13, 2017 (64 DCR 10306). The purpose of the amendments was to place the Board's Regulations into conformity with the Campaign Finance Reform and Transparency Emergency Act of 2016, enacted December 24, 2016 (D.C. Act 21-584:63 DCR 16043 (December 30, 2016)), and the Campaign Finance Reform and Transparency Temporary Amendment Act of 2016, enacted April 1, 2017 (D.C. Act 21-619:64 DCR 885 (February 3, 2017)) (the "Acts.") The Regulations capture the application of the \$5,000 limitation on contributions to political action committees during non-election years, and the increased reporting requirements of

political action committees and independent expenditure committees during non-election years; and clarify the requirements of the certification required by business contributors.

The specific amendments are as follows:

- (1) Chapter 30, “Campaign Finance Operations: Committees, Candidates, Constituent Service Programs, and Statehood Funds.” Adopted October 13, 2017
  - § 3011.2. Revised to include the contribution limitation (h) Political Action Committee (PAC) five thousand dollars (\$5,000);
  - § 3011.3. Revised to limit the amount PACs may receive during any one election to five thousand dollars (\$5,000);
  - § 3011.29. Revised to require business contributors to a political committee, political action committee, or independent expenditure committee to include only the affiliated entities which have also made contributions to the committee;
  - § 3011.30. Repealed provision which recited the statutory requirements for compliance with the OCF requests for information;
  - § 3011.33. Repealed the provision which excepted political action committees from the contribution limitations; and
  - § 3017.3. Revised to require political action committees and independent expenditure committees to also file R & E Reports on April 10<sup>th</sup> and October 10<sup>th</sup> of each year in which there is no election.
- (2) Chapter 34, “Campaign Finance Recordkeeping”. The most recent revision of this Chapter was adopted October 13, 2017.
  - §§ 3400.3 (c) and 3402.2 (c) were Repealed.
- (3) Chapter 38, “Legal Defense Committees”. The most recent revision of this Chapter was adopted on October 13, 2017.
  - § 3802.5 (c). Revised to require the treasurer and the legal beneficiary of the legal defense committee to maintain only the names of the affiliated entities which have made contributions to a legal defense committee.
- (4) Chapter 41, “Campaign Finance Operations: Exploratory Committees”. The most recent revision of this Chapter was adopted on October 13, 2017.
  - § 4101.1. Revised to allow candidates to designate an exploratory committee as a principal campaign committee; and

- § 4101.2(a). Revised to require an exploratory committee to be named as a “Connected Organization or Affiliated Committee” in the Statement of Organization.

Second, the Agency proposed the Notice of Emergency and Proposed Rulemaking to the Board of Elections for adoption on September 5, 2018 to increase the expenditure limits for the Constituent Service Programs (65 DCR 9623; September 14, 2018). The revised Regulations place the Board’s Regulations into conformity with recent amendments to the Campaign Finance Act. The Notice of Final Rulemaking was adopted by the Board of Elections on November 15, 2018, and published in the D.C. Register on November 30, 2018 (Volume 65/49). The amendments were as follows:

- (1) Chapter 30, “Campaign Finance Operations: Committees, Candidates, Constituent Service Programs, and Statehood Funds,” adopted, November 30, 2018.

- §§ 3014.21(a) Revised to increase allowable expenditures from the program during a calendar year to sixty thousand dollars (\$60,000),

Third, on January 4, 2019, the Board of Elections published a Notice of Proposed Rulemaking in the District of Columbia Register of its intent to take final rulemaking action to adopt Chapter 42, “The Fair Elections Program”, and Chapter 43, “The Verification Process”, amendments to Title 3 (Elections and Ethics”) of the District of Columbia Municipal Regulations, in not less than thirty (30) days from the date of the publication. The Regulations will implement the provisions of the “Fair Elections Amendment Act of 2018”. Comments were received from members of the public during the public comment period and are currently under review by the Agency. The amendments were as follows:

- (1) Chapter 42, “Fair Elections Program”. This Chapter was added to the regulations to establish the procedures governing the public financing of political campaigns provided by the “Fair Elections Act of 2018.”
- (2) Chapter 43, “Verification Process” This Chapter was added to the regulations to establish a process for the verification of contributions received by a committee electing to participate in the public financing program.

**23. Please provide a list of all studies, research papers, reports, and analyses that the agency prepared or for which it contracted in FY18 and FY19, to date. Please state the status and purpose of each. Please submit a hard copy to the Committee if the study, research paper, report, or analysis is complete.**

**RESPONSE:**

First, on January 31, 2019, the Office of Campaign Finance issued and presented in an electronic format the 2019 Biennial Report of Contributions and Expenditures to the Mayor and the Council of the District of Columbia for the period from January 2017 through December 2018. 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 31<sup>st</sup>. 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 K**, the email dated January 31, 2018 which provided links to the 2019 Biennial Report.

Second, the Office of Campaign Finance has continued in FY18 and FY19, to date, to research how various jurisdictions administer their public financing programs through the examination of their statutes, regulations, forms, brochures, guides, training materials, and post-election reports. Members of the Office of Campaign Finance Staff travelled to Annapolis, Maryland in June 2018, New York, New York in July 2018 and to the Council on Government Ethics Laws (COGEL) Conference in Philadelphia Pennsylvania in December 2018. These visits provided the OCF staff member with opportunities to observe fully functioning public financing programs and gain insight into what is required to design and implement a successful Fair Elections Program.

**24. Please separately list each employee whose salary was \$100,000 or more in FY18 and FY19, to date. Provide the name, position number, position title, program, activity, 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 FY18 and FY19, 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 FY18 and FY19, to date, if applicable. For each, state the employee's name, position number, position title, program, activity, 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 FY18 and FY19, to date.

**26. For FY18 and FY19, to date, please provide a list of employee bonuses or special 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 FY18 and FY19, to date.

**27. Please provide each collective bargaining agreement that is currently in effect, and differs from that submitted last year, for agency employees. Please include the bargaining unit and the duration of each agreement. Please note if the agency is currently in bargaining and its anticipated completion.**

**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, wards of residence, and attendance of each member. Include any vacancies.**

**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, 2017, and 2019) may be viewed at the OCF Website, [www.ocf.dc.gov](http://www.ocf.dc.gov).

On January 31, 2019, the Agency presented the OCF 2019 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. The January 2019 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.

In addition, D.C. Official Code Section 1-1163.04 (3) requires the Director of the Office of Campaign Finance to make the reports and statements filed with him or her available for public inspection and copying, commencing within 48 hours of receipt. Under the electronic filing system, financial reports are available real time at the OCF Website upon submission for inspection and for immediate download. The Office of Campaign Finance is currently in compliance with this statutory provision

D.C. Law 22-94, the “Fair Elections Amendment Act of 2018, effective May 5, 2018, and applicable November 7, 2018, established the Fair Elections Program in the Office of Campaign Finance. As codified in D.C. Official Code § 1-1163.32j, the Director of Campaign Finance will be required to submit a report to the Mayor and the Council no later than 9 months after the end of each election cycle concerning the administration of the Program, including the names of the participating and non-participating candidates, the payments made from the fund, the listing of qualified small dollar contributions by participating and non-participating candidate, a listing of expenditures by participating candidate, remitted funds, personal funds, and a review and evaluation of the Program on District elections and campaigns, and of national best practices relating to public financing programs, with recommendations for changes. The first report will be due no later than 9 months after the November 2020 General Election.

### **AGENCY OPERATIONS**

**30. Please describe any initiatives that the Agency implemented in FY18 or FY19, 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 Office of Campaign Finance enhanced the OCF E-Filing and Disclosure System to incorporate the recommendations received from the public during the FY17 Online Survey conducted to assess the effectiveness of the System to deliver information and services. The Survey was published at the OCF Website in August 2016 and closed for comment on December 31, 2016. The original OCF Website and E-Filing System was 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 EF 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 Online Survey was employed to 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.

A total of twenty-six (26) users of the Website participated in the survey via a popup window. The Website Usability Survey Report was submitted to the OCF on January 13, 2017, and the results evaluated and recommendations forwarded for enhancements to the OCF on September 26, 2017.

The upgrades include the display of a warning message to a filer where the cash on hand at the beginning of the reporting period is not equal to the cash on hand at the beginning of the reporting period of the succeeding report, and allows the filer to refresh the beginning cash on hand balance; redesigned the debt and loan module pages to provide information to the filer with each subsequent entry, including the date the loan/debt was incurred, the loan/debt amount, the total repayment amount with details as to each payment date, and the balance amount; enhancement of the data download modules which displayed the filer name in a single column, and address in a single column, to split the name into First Name, Middle Name, Last Name, and Organization Name, and the address field into Address, City, State, and Zip Code to provide more user friendly engagement of the contribution and expenditure search feature; a feedback form to enable filers to provide comments/feedback on their use of the E-Filing System, with a

rating option, and an administrative module for the OCF E-Filing Administrator to view the feedback received; and an option for the filer to update their email address to receive notices from the OCF. In addition, the E-Filing System was enhanced to provide for the use of the excel spreadsheet to import contributor information in the e-filing applications in the Constituent Services Program.

The enhancements to the OCF E-Filing and Disclosure System will improve the public's access to data by increasing the fields for the search feature and the sort of data for download; simplify the reporting of debt and loan information on financial reports; and provide a vehicle for user feedback prior to the close of each e-filing session. The enhancement of the OCF E-Filing and Disclosure System aids the Agency in its ongoing efforts to ensure the disclosure of accurate and complete data, the increased transparency of financial reporting, and easy access by the public to the financial information received by the Agency.

To further expand the Office of Campaign Finance Educational Program, the Agency during FY18 established a Community Outreach Program. The Office of Campaign Finance partnered with the Board of Elections in its 2018 Voter Registration and Education Outreach Campaign. The goal of the Community Outreach Program is to participate in community events to expand the audience through which information may be disseminated on the Campaign Finance Laws and the Agency's role to administer the laws. To assist in these efforts, the Agency designed a Brochure to outline the Agency's mission, scope of services, regulations, and enforcement duties. The Agency participated in five (5) events throughout the City.

The first joint venture took place on Monday, April 23, 2018 the Washington Metropolitan High School located at 300 Bryant St., N.W. The next event attended with the BOE was on Saturday, June 9, 2018 at the 10<sup>th</sup> Annual DC Housing Expo and Home Show held at the Walter E. Washington Convention Center.

In addition, the OCF and the BOE teamed up to participate in the Metropolitan Police Department's (MPD) Community Outreach Program titled "Beat the Streets Series." The OCF's Supervisory Training Officer and two staff members participated in the well-attended outreach events, held discussions, and provided the community with OCF Campaign brochures and information. The dates and locations attended are as follows:

- Wednesday, July 11, 2018 at 2600 Douglas Rd., S.E. (KIPP Charter School)
- Wednesday, August 1, 2018 at 6200 Dix St., S.E. (Block Party)
- Wednesday, August 8, 2018 at 115 Atlantic St. S.W. (Bellevue Library)

The Agency scheduled onsite training sessions to focus on the “Business Contributor” reporting requirements, and designed a Business Contributor Training Tutorial for view at the OCF Website. The Business Entities Training Seminars are designed to assist businesses with the knowledge needed to understand the changes governing Campaign Finance regulations regarding Contribution Limits, Bundling, Reporting and Disclosure Requirements, and Independent Expenditures.

The Agency’s primary point of contact with the District of Columbia’s Chamber of Commerce has been the Director of Public Policy and Programs. The Office of Campaign Finance provides the Chamber of Commerce with training information and flyers for dissemination to its membership regarding the scheduled seminars. We also utilize our social media platforms Facebook Page and Twitter, to inform the business community of the training schedule. Below is the listing of the Business Entity training made available onsite in FY18, and FY19, to date:

- Thursday, February 15, 2018
- Thursday, March 22, 2018
- Thursday, May 3, 2018
- Thursday, July 12, 2018
- Thursday, September 6, 2018
- Thursday, October 4, 2018
- Thursday, November 1, 2018
- Thursday, December 6, 2018
- Thursday, January 3, 2019

The increased efforts of the Agency to inform and educate the public concerning the Campaign Finance Laws and the role of the Agency in the administration of these laws strengthen the public’s confidence in the integrity of the election process, public office, and the ability of this Agency to enforce the Laws where violated.

To fully implement the Fair Elections Amendment Act of 2018, during FY18, the Agency invited both representatives of member organizations of the D.C. Fair Elections Commission and District residents who were strong advocates of the D.C. Law 22-94, the “Fair Elections Amendment Act of 2018,” effective May 5, 2018, to participate in a Planning Committee organized by the OCF to develop policy recommendations in certain areas to assist with the

implementation of the Fair Elections Program. The meetings were held on July 26, 2018 and November 14, 2018, and the OCF Managers have met individually with Members of the Planning Commission. Further meetings will be scheduled during FY19 to introduce the Fair Elections Division Manager, to discuss proposed comments to rules to implement the Fair Elections Amendment Act of 2018, and to discuss educational outreach efforts.

The Planning Committee offers the opportunity for private citizens and community organizations to collaborate with the Office of Campaign Finance to plan a strong foundation for the Fair Elections Program in the areas of engagement of voters through community outreach, the use of technology to provide greater transparency and disclosure of campaign operations; the administration of the debate requirement; and creating candidate services to aid with compliance. The organization of the Planning Committee has established a critical link with the community which will assist the Office of Campaign Finance in determining how best to educate the public concerning the introduction of the public financing of campaign operations in the District of Columbia.

Last, the Office of the General Counsel identified the subject matter of each of the Office of the General Counsel identified the subject matter of each of the “Complaints and Final Decisions” listed at the Enforcement Link at the OCF Website from Calendar Years 2000 through 2018 to enable the revision of the Link to provide for a public search feature by topic. The revision of the “Complaints and Final Decisions” Link at the OCF Website to include a search feature by topic will provide a more user friendly resource for the public relative to the location and application of the Campaign Finance Laws by the Agency in specific types of investigative matters.

**31. What are the agency’s top five priorities? Please explain how the agency expects to address these priorities in FY19. How did the agency address its top priorities listed for this question last year?**

**RESPONSE:**

**I. FY18 PRIORITIES**

The top five (5) priorities for the Agency listed during Fiscal Year 2018, listed in no particular order, and how the priorities were addressed are as follows:

- (1) Conduct 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 19<sup>th</sup>, 2018 Primary Election.

**ACTION TAKEN DURING FY18:** The Office of Campaign Finance organized site visits to the nine (9) Early Voting Centers on June 13, 2018 and to 87 of the Election Precincts operated by the Board during the June 19<sup>th</sup>, 2018 Primary Election. 10 or more Precincts were inspected within each Ward. The OCF Staff provided counsel where necessary, and found very few infractions during the site visits to the Election Precincts, Electioneering markers were accurately measured and placed at the 50 foot boundary from the Precinct entrance; electioneering activity was conducted within the appropriate boundaries; and most campaign signs observed displayed the proper disclaimers.

- (2) Establish a Community Outreach Program through which information on the Campaign Finance Laws may be disseminated at events in the community.

**ACTION TAKEN DURING FY18:** To further expand the Office of Campaign Finance Educational Program, the Agency during FY18 established a Community Outreach Program. The Office of Campaign Finance partnered with the Board of Elections in its 2018 Voter Registration and Education Outreach Campaign. The goal of the Community Outreach Program is to participate in community events to expand the audience through which information may be disseminated on the Campaign Finance Laws and the Agency's role to administer the laws. To assist in these efforts, the Agency designed a Brochure to outline the Agency's mission, scope of services, regulations, and enforcement duties. The Agency participated in five (5) events throughout the City, as more fully described in the response to Question No. 30.

- (3) Conduct a comprehensive review of the OCF Regulations, Forms, Brochures, and Standard Operating Procedures to fully implement any legislative enactments which impact the Campaign Finance Act.

**ACTION TAKEN DURING FY18:** During FY18, the Office of the General Counsel commenced the comprehensive review of the OCF Regulations, Forms, and Brochures to include the provisions and reflect the changes arising from the Fair Elections Amendment Act of 2018, effective May 5, 2018, and applicable November 7, 2018. The Agency proposed the Notice of Emergency and Proposed Rulemaking to the Board of Elections for adoption on September 5, 2018 to increase the expenditure limits for the Constituent Service Programs (65 DCR 9623;

September 14, 2018). The revised Regulations place the Board's Regulations into conformity with recent amendments to the Campaign Finance Act. The Notice of Final Rulemaking was adopted by the Board of Elections on November 15, 2018, and published in the D.C. Register on November 30, 2018 (Volume 65/49).

- (4) Provide in-house training for members of the OCF Staff to reinforce their understanding of the Campaign Finance Act, as amended.

**ACTION TAKEN DURING FY18:** During FY18, the Office of Campaign Finance through its Audit and Legal Divisions routinely provides training for the OCF Staff to keep OCF Staff informed of any amendments to the Campaign Finance Laws, or revisions to the OCF Regulations, Standard Operating Procedures, and Forms. Moreover, as a matter of course, the OCF Staff is invited to attend the public onsite seminars and the Mandatory Entrance Conferences to reinforce their understanding of the Campaign Finance Laws.

- (5) Provide a public search feature by topic of the "Complaints and Decisions" link at the OCF Website to increase the transparency of the OCF Enforcement Operations.

**ACTION TAKEN DURING FY18:** The Office of the General Counsel identified the subject matter of each of the Office of the General Counsel identified the subject matter of each of the "Complaints and Final Decisions" listed at the Enforcement Link at the OCF Website from Calendar Years 2000 through 2018 to enable the revision of the Link to provide for a public search feature by topic. The revision of the "Complaints and Final Decisions" Link at the OCF Website to include a search feature by topic will provide a more user friendly resource for the public relative to the location and application of the Campaign Finance Laws by the Agency in specific types of investigative matters.

## **II. FY19 PRIORITIES**

The top priorities for the Agency in Fiscal Year 2019, for the most part, center around activities designed to prepare the Agency to administer the provisions of the "Fair Elections Amendment Act of 2018", and include the following:

- (1) Reorganization of the Office of Campaign Finance to create a Fair Elections Program Division. Effective December 14, 2018, the Office of Campaign Finance was reorganized to establish a Fair Elections Program Division. The Fair Elections Program Division is

responsible for the verification of the contribution reports and other documents received in the Office from candidates participating in the Fair Elections Program or seeking certification in the Program. The Division makes recommendations for the certification of candidates into the Fair Elections Program and the authorization of Base Amount and Matching Payments; initiates referrals to the OGC for non-compliance actions and responds to appeals from Agency actions before the Board of Elections; conducts full field audits of the campaign operations of participating candidates at the submission of their final financial report; coordinates educational outreach for participating candidates, candidates seeking certification, and the public, and the Debate Program; collects data from financial reports for post-election reports; and manages the remission of funds and equipment.

During the remainder of Fiscal Year 2019, the Agency will ensure that the Fair Elections Program Division becomes fully operational through the completion of the recruitment process for the Positions assigned to the Division, and the reassignment of Positions within the Agency to the Division; and the development of Standard Operating Procedures (SOPs) for the Division. The SOPs will detail the internal operations of the Division, including, the mechanics of the verification process for Qualified Small Dollar Contributions; the calculation of caps for matching payments and the amounts for matching payments authorized from the Elections Fund; the public training and outreach component; the process for notification to candidates of actions taken by the Agency affecting their campaigns; the pre-notification and failure to file programs; and the collection and format of data for public disclosure.

- (2) Recruitment of the Positions for the Program, namely, the Fair Elections Program Manager (MSS-14), the Technology Specialist (CS-13), and the Auditor Positions (two (2) Auditor Positions (CS-13) and (one (1) Auditor Position (CS-11). The Office of Campaign Finance developed Position Descriptions for the Fair Elections Program Manager, MSS-0340-14, and the Information Technology Specialist, CS-2210-13, and forwarded the draft Position Descriptions to the Department of Human Resources (DHR) for Classification on September 11, 2018. The Position Descriptions were approved for Classification on October 23, 2018, and the Vacancy Announcements for both Positions were published at the DHR Website on November 6, 2018, for a two (2) week period. In

addition, the Office of Campaign Finance submitted the Vacancy Announcements for both Positions for publication at the Career Center Link at the Website of the Council on Governmental Ethics Laws (COGEL) and the Job Openings Link at the Election Center, the National Association of Election Officials.

Erick L. Jackson was selected as the Fair Elections Division Manager, effective January 6, 2019. A selection has been made for the Information Technology Specialist and forwarded to the Department of Human Resources. The Vacancy Announcements for the Auditor Positions (two (2) CS-13 and one (1) CS-12) assigned to the Program closed on February 3, 2019, and the highly qualified candidates for these Positions are scheduled for interviews on February 28, 2019. The Attorney Advisor, LS-13, was reassigned from the Office of the General Counsel to the Fair Elections Program Division on January 22, 2019. The two (2) Auditor Positions, one (1) CS-11 and one (1) CS-9, in the Reports Analysis and Audit Division, which will be reassigned to the Fair Elections Program Division, are vacant and currently in active recruitment.

- (3) Development of the E-Filing and Disclosure System for the Fair Elections Program. During FY2019, the Office of Campaign Finance will focus on the Design and Development of the E-Filing Applications and Forms for the Program. The Agency will develop an application for the online submission of financial reports from candidates seeking certification in, and participating in the Fair Elections Program; and create reports of data easy for the public to sort, search, and download from the OCF database. The Office of Campaign Finance will also create a new link at the OCF Website dedicated solely to the Fair Elections Program from which information will be readily available.

As you know, the FY 2019 Budget for the Office of Campaign Finance became available on October 1, 2018, the beginning of the new Fiscal Year. The Office of Campaign Finance drafted the proposed Statement of Work for the Request for Quotes for the Development of the E-Filing and Disclosure System and Website Content for the Fair Elections Program, consistent with the requirements of the Fair Elections Amendment Act of 2018, and the system specifications OCF deems necessary to enable, inter alia, the receipt online of Reports of Receipts and Expenditures, the upload of scanned copies of



contributor receipts and certifications, bank statements, deposit slips, and loan documents, and administrative and public reports. The original quote of \$62,000.00 for the project was understated. Based on the most recent detailed system requirements provided to our vendor, we have a new quote. It is projected that the approximate cost of the design and development of a System which will meet the requirements critical to the ability of the OCF to successfully implement the Fair Elections Program, is \$387,981.00. Consequently, the Office of Campaign Finance met with the OCF Financial Managers in the Office of Financial Resource Management on October 28, 2018 and on November 5, 2018, which meeting also included Christopher A. Murray, Senior Budget Analyst, Office of Budget and Performance Management, Office of the City Administrator, and is in continued conversations, to discuss the spending pressures encountered by the Agency based upon the OCF FY 2019 Non Personal Services Budget. In addition, the Office of Campaign Finance addressed the Fiscal Year 2019 Spending Pressures faced by the Agency during the Budget Review Team Meeting on November 13, 2018 on the FY 2020 OCF Budget Submission. Once the budget issues are resolved, considering the new system enhancement budget estimate, the Agency will initiate the procurement process for the services related to the development of the E-Filing System for the Fair Elections Program. We are currently unable to provide a timeframe regarding this matter but have been informed that the OCF Financial Managers are working diligently with the Office of the City Administrator to identify the needed funding.

During the interim, the OCF Website has been enhanced to include a “slider” dedicated to the Fair Elections Program, with a link, which features information solely relative to the Program. The link will be routinely updated as more information becomes available. The Office of Campaign Finance expects the System to be fully operational for the December 10, 2019 Deadline for the filing of Reports of Receipts and Expenditures. The December 10<sup>th</sup> 2019 Filing Deadline is the first required filing date for the candidates and committees participating in the June 2020 Primary Election, consistent with D.C. Official Code § 1- 1163.09 (b), as amended. However, to enable the submission of Reports of Receipts and Expenditures by any candidate and committees who may register their intent to seek certification as a participant in the Fair Elections Program prior to the December 10, 2019 Filing Deadline, the OCF is working with its current vendor under

the FY 2019 Maintenance Agreement for the existing OCF E-Filing System to establish a temporary site for online filing under the Program. The temporary site will facilitate the e-filing of contributor schedules, address verification, and the upload of necessary documents, including contributor receipts, bank statements, canceled checks; and provide a registration module designed specifically for candidates under the Fair Elections Program.

(4) Proposal of OCF Regulations, Forms, and Guidance. The Office of the General Counsel will promulgate regulations, draft forms, a guide, and filing and training calendars to fully implement the requirements of the “Fair Elections Amendment Act of 2018”. On January 4, 2019, the Board of Elections published a Notice of Proposed Rulemaking in the District of Columbia Register (Volume 66/1) of its intent to take final rulemaking action to adopt Chapter 42, “The Fair Elections Program”, and Chapter 43, “The Verification Process”, amendments to Title 3 (Elections and Ethics”) of the District of Columbia Municipal Regulations, in not less than thirty (30) days from the date of the publication. The Regulations will implement the provisions of the “Fair Elections Amendment Act of 2018”. Comments were received from members of the public during the public comment period and are currently under review by the Agency. The 2019 Training Calendar was published at the OCF Website on December 14, 2018, and includes Seminars specific to the Fair Elections Program.

(5) Development of the Educational Component for the Program. The Office of Campaign Finance will expand the OCF Educational Program to fully introduce the Fair Elections Program, established by D.C. Law 22-94, the “Fair Elections Amendment Act of 2018,” effective May 5, 2018. D.C. Law 22-94 will provide for the public funding of campaign operations in the District of Columbia. The OCF will design online tutorials, brochures, and a campaign finance guide to provide clear guidance in plain language on the requirements and purpose of the new Law to the residents of the District of Columbia. The OCF will revise the Mandatory Training Program and the onsite Educational Seminars to create seminars specific to the reporting requirements, contribution limitations and prohibitions of the Fair Elections Act; and utilize the OCF Website and Social Media Platforms to disseminate continuous information on the new Program.

The Office of Campaign Finance has created educational materials about the Fair Elections Program. The initial set of materials is available at the OCF Website, and for dissemination to the public. The materials include an informative and concise pamphlet that explains the Fair Elections Program, how it works, who is eligible to participate and when; and PowerPoint presentations offering an analysis of the Fair Elections Amendment Act of 2018.

The Office of Campaign Finance's public outreach strategy for the coming months and long term is comprehensive and wide-ranging. The outreach goal for the Public Financing Program is to inform targeted groups (potential candidates) and the general public about the program in a timely manner through the incorporation of the Fair Elections Program into the existing and newly expanded OCF Public Education Training Program. The Program has been developed to include a partnership with the Office of Advisory Neighborhood Commissions. The Office of Advisory Neighborhood Commissions has agreed to assist the OCF in notifying the ANC membership that OCF would like to be placed on their agendas to inform the community about the Fair Elections Public Financing Program. The OCF has mapped out the 40 Advisory Neighborhood Commissions, which consist of the District's 296 Single Member Districts, located in Wards 1 through 8. The outreach to ANC audiences would begin during the first week of April 2019 with a targeted goal of the OCF presenting at two (2) ANC meetings weekly through August of 2019 until each Single Member District is reached. In addition, the OCF is incorporating the Fair Elections Education Program into its existing Public Training seminars. Those seminars include the Mandatory Entrance Conferences, monthly webinars targeting candidates and treasurers titled Understanding the Rules of the Campaign Finance Game, and the public seminars offered monthly for candidates and committees, the Constituent Services and Statehood Fund Programs, the Legal Defense, Exploratory, Inaugural, and Transition Committees, and the public. All educational materials utilized in the seminars will be updated to include the Fair Elections Program. In addition, OCF will utilize its social media outlets, Facebook and Twitter to inform and educate the public about the Fair Elections Public Financing Program.

In the long term, the Office of Campaign Finance will seek the procurement (dependent upon the availability of funds) of public service announcements (PSAs) and educational videos and postcard mailers to DC households informing residents of the FEP. The PSAs and the videos would be broadcasted on OCF's website, local television and online via websites such as YouTube, Facebook, and Twitter.

Last, the new E-Filing and Disclosure System once developed will provide reports online, including a listing of the public funds payouts, contribution and expenditure search features with data download, contributions by geography, summary contribution and expenditure reports, and candidate and committee quick stats.

In addition, the Agency during FY 19, will execute its responsibilities 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 2018 General Election, continuing committees, and the Constituent Service and Statehood Fund Programs. The Agency organized 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 6, 2018 General Election. The site visits 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.

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.

The Agency produced and disseminated in an electronic format on January 31, 2019, the 2019 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.

Through the Audit Program, the Agency will ensure compliance with the reporting requirements, and the complete and accurate representation of campaign financial activity. The Audit Branch will conduct full field audits of the campaign operations of candidates newly elected to Office, and reviews of the Summary Financial Statements of candidates for the Office of Advisory Neighborhood Commission Member due following the certification of the results of the November 2018 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 1<sup>st</sup> and April 1<sup>st</sup> Filing Deadlines, and of the continuing committees following the January 31<sup>st</sup> and July 31<sup>st</sup> Filing Deadlines.

**32. Please list each new program implemented by the agency during FY 18 and FY 19, 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. FY18 PROGRAMS**

First, the Office of Campaign Finance enhanced the OCF E-Filing and Disclosure System to incorporate the recommendations received from the public during the FY17 Online Survey conducted to assess the effectiveness of the System to deliver information and services. The Survey was published at the OCF Website in August 2016 and closed for comment on December 31, 2016. The original OCF Website and E-Filing System was 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 EF 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 Online Survey was employed to 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.

A total of twenty-six (26) users of the Website participated in the survey via a popup window. The Website Usability Survey Report was submitted to the OCF on January 13, 2017, and the results evaluated and recommendations forwarded for enhancements to the OCF on September 26, 2017.

The upgrades include the display of a warning message to a filer where the cash on hand at the beginning of the reporting period is not equal to the cash on hand at the beginning of the reporting period of the succeeding report, and allows the filer to refresh the beginning cash on hand balance; redesigned the debt and loan module pages to provide information to the filer with each subsequent entry, including the date the loan/debt was incurred, the loan/debt amount, the total repayment amount with details as to each payment date, and the balance amount; enhancement of the data download modules which displayed the filer name in a single column, and address in a single column, to split the name into First Name, Middle Name, Last Name, and Organization Name, and the address field into Address, City, State, and Zip Code to provide more user friendly engagement of the contribution and expenditure search feature; a feedback form to enable filers to provide comments/feedback on their use of the E-Filing System, with a rating option, and an administrative module for the OCF E-Filing Administrator to view the feedback received; and an option for the filer to update their email address to receive notices from the OCF. In addition, the E-Filing System was enhanced to provide for the use of the excel spreadsheet to import contributor information in the e-filing applications in the Constituent Services Program.

The enhancements to the OCF E-Filing and Disclosure System will improve the public's access to data by increasing the fields for the search feature and the sort of data for download; simplify the reporting of debt and loan information on financial reports; and provide a vehicle for user feedback prior to the close of each e-filing session. The enhancement of the OCF E-Filing and Disclosure System aids the Agency in its ongoing efforts to ensure the disclosure of accurate and

complete data, the increased transparency of financial reporting, and easy access by the public to the financial information received by the Agency.

To further expand the Office of Campaign Finance Educational Program, the Agency during FY18 established a Community Outreach Program. The Office of Campaign Finance established a Community Outreach Program and partnered with the Board of Elections in its 2018 Voter Registration and Education Outreach Campaign. The goal of the Community Outreach Program is to participate in community events to expand the audience through which information may be disseminated on the Campaign Finance Laws and the Agency's role to administer the laws. To assist in these efforts, the Agency designed a Brochure to outline the Agency's mission, scope of services, regulations, and enforcement duties. The Agency participated in five (5) events throughout the City. The Agency scheduled onsite training sessions to focus on the "Business Contributor" reporting requirements, and designed a Business Contributor Training Tutorial for view at the OCF Website. The increased efforts of the Agency to inform and educate the public concerning the Campaign Finance Laws and the role of the Agency in the administration of these laws strengthen the public's confidence in the integrity of the election process, public office, and the ability of this Agency to enforce the Laws where violated.

To fully implement the Fair Elections Amendment Act of 2018, during FY18, the Agency invited both representatives of member organizations of the D.C. Fair Elections Commission and District residents who were strong advocates of the D.C. Law 22-94, the "Fair Elections Amendment Act of 2018," effective May 5, 2018, to participate in a Planning Committee organized by the OCF to develop policy recommendations in certain areas to assist with the implementation of the Fair Elections Program. The meetings were held on July 26, 2018 and November 14, 2018, and the OCF Managers have met individually with Members of the Planning Commission. The Agency will continue during FY19 to utilize the services of the Planning Committee.

The Planning Committee offers the opportunity for private citizens and community organizations to collaborate with the Office of Campaign Finance to plan a strong foundation for the Fair Elections Program in the areas of engagement of voters through community outreach, the use of technology to provide greater transparency and disclosure of campaign operations; the administration of the debate requirement; and creating candidate services to aid with compliance.

The organization of the Planning Committee has established a critical link with the community which will assist the Office of Campaign Finance in determining how best to educate the public concerning the introduction of the public financing of campaign operations in the District of Columbia.

Last, the Office of the General Counsel identified the subject matter of each of the Office of the General Counsel identified the subject matter of each of the “Complaints and Final Decisions” listed at the Enforcement Link at the OCF Website from Calendar Years 2000 through 2018 to enable the revision of the Link to provide for a public search feature by topic. The revision of the “Complaints and Final Decisions” Link at the OCF Website to include a search feature by topic will provide a more user friendly resource for the public relative to the location and application of the Campaign Finance Laws by the Agency in specific types of investigative matters.

The FY18 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. FY19 PROGRAMS**

The Office of Campaign Finance is responsible for the administration of the Fair Elections Program, as established by the “Fair Elections Amendment Act of 2018”, D.C. Law 22-94, effective May 5, 2018, and applicable November 7, 2018.

As you know, the “Fair Elections Amendment Act of 2018” (the “Fair Elections Act”) dramatically changes the mode of financing campaign operations in the District of Columbia by offering candidates for elective office, with the exception of candidates for the Office of Member of an Advisory Neighborhood Commission, the opportunity to qualify for the public funding of their political campaigns. The Fair Elections Act establishes the Fair Elections Program (the “Program”) within the Office of Campaign Finance and charges the Agency with the responsibility to administer the laws and regulations governing the Program; to promulgate procedures to govern the audit and verification of qualified small dollar contributions for compliance with the requirements of the Program; to authorize the payment of base amount and matching payments from the Elections Fund, and oversee the remission of funds; and to review and evaluate the Program following each election cycle, and submit reports to the Mayor, the



Council, and to the public concerning the status of the Program and its effect on campaigns. The Elections Fund is a special non-lapsing fund created for use solely for the distribution of payments to candidates who qualify to participate in the Program.

The Fair Elections Program is voluntary, and prescribes distinct contribution limits, expenditure prohibitions, and reporting requirements. The regulation of the financial operations of those candidates, who do not elect to participate in the Program, will remain subject to the existing reporting requirements of the Campaign Finance Act.

The Office of Campaign Finance was reorganized by Administrative Issuance No. 2018-01, effective December 14, 2018, to establish the Fair Elections Program Division. The Fair Elections Program Division is responsible for the verification of the contribution reports and other documents received in the Office from candidates participating in the Fair Elections Program or seeking certification in the Program. The Division makes recommendations for the certification of candidates into the Fair Elections Program and the authorization of Base Amount and Matching Payments; initiates referrals to the OGC for non-compliance actions and responds to appeals from Agency actions before the Board of Elections; conducts full field audits of the campaign operations of participating candidates at the submission of their final financial report; coordinates educational outreach for participating candidates and candidates seeking certification, and the Debate Program; collects data from financial reports for post -election reports; and manages the remission of funds and equipment.

The FY 2019 OCF Budget includes an enhancement for the implementation of the Fair Elections program in the amount of \$860,000 for administrative costs associated with the procurement of services for the design and development of an online financial reporting system unique to the pre-certification and post certification accounting mandated by the Fair Elections Act, the creation of a parallel filing system to segregate the publicly financed candidate committees from those committees which remain in the traditional financing program, the overhaul of the OCF Website to include information about the program (\$62,000.00); increases in the personal services budget to fund three (3.0) Full-Time Equivalents (FTEs) Auditor Positions (\$248,000.00); and to support primary and general election financing for the 2020 Election Cycle (\$550,000.00). In addition, to further support the Fair Elections Program, a personal services increase of \$260,558 was identified for two (2.0) Full-Time Equivalents (FTEs): a Fair Elections

Program Manager, who can oversee the Program, and serve as a point person for community engagement; and a Chief Technology Officer, who can oversee the technological aspects of the Program. The title of the Chief Technology Officer Position was changed by the Department of Human Resources during the Classification of the Position to Information Technology Specialist.

The \$62,000.00 allocated in the FY 2019 Budget for the Office of Campaign Finance will not support the funding required to procure the E-Filing System with the specifications deemed critical to the full implementation of the Fair Elections Act, as well as the procurement of other services necessary to educate the public and improve the effectiveness of the OCF Audit Division. The Office of Campaign Finance is responsible for the audit and verification of the financial reports of candidates, both seeking to participate, and certified to participate in the Program. The original estimate of \$62,000.00 for the E-Filing System was submitted during early 2018, when the Fair Elections Act was before the Council for adoption, and was understated. Following the OCF's observation of the online filing and disclosure systems utilized by the New York City Campaign Finance Board (the C-Smart System) and the Maryland State Board of Campaign Finance in their public financing programs, the specifications for the OCF E-Filing System were more accurately defined. As a consequence, the most recent quote is \$387,981.81.

Last, the Office of Campaign Finance submits that the procurement of public service announcements, videos, and postcard mailers would expand the scope of its outreach to the public, and more effectively educate the residents of the District of Columbia about the Fair Elections Program (\$40,000 at a minimum based on discussions with the Executive Director of the Board of Elections). The Agency will also partner with the Office of Advisory Neighborhood Commissions to appear on the Meeting Agendas of the 40 Advisory Neighborhood Commissions from April 2019 through July 2019, with a targeted goal to present at two (2) ANC meetings weekly to inform the public about the Fair Elections Public Financing Program. This effort will require the payment of overtime compensation for approximately six (6) OCF staff during this period for at least three (3) hours for each event.

Second, if D.C. Act 22-107, the "Campaign Finance Reform Amendment Act of 2018", becomes effective during Fiscal Year 2019, additional upgrades of the OCF E-Filing and Disclosure System will be required to fully implement the amendments to the Campaign Finance Act, at an

approximate cost of \$100,000.00, and additional personnel will be necessary to meet the added responsibilities thereunder, one (1) Auditor Position, CS-11, Step 1 (\$59,727.00); one (1) Attorney Position, LS-12, Step 1 (\$84,000.00); and one (1) Information Technology Specialist, CS-11, Step 1 (\$59,727.00).

**32. What are the top metrics regularly used by the agency to evaluate its operations?  
Please be specific about what data points are monitored by the agency.**

**RESPONSE:**

The OCF Key Performance Indicators, Measures and Target, and the Workload Measures for each Program are discussed below:

- (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 Key Performance Indicators and 3 Workload Measures)
  - a. Percent of informal hearings conducted and closed before the next filing deadline. The target is 100%. The objective of the Office of the General Counsel is to conduct informal hearings and resolve alleged violations of the reporting requirements prior to the next filing deadline. The corresponding Workload Measure is the “Total Number of informal hearings conducted”, which information is collected from the monthly activity reports of the OGC (which include the number of “Informal Hearings Referred”, “Informal Hearings completed”, and “Informal Hearing Orders Issued”), and is based upon the actual date of the referral of the reporting deficiency for enforcement, the notices of hearings, the Orders of the Director published at the OCF Website disposing of these matters, and the next filing date of the filer.
  - b. Percent of Interpretative Opinions issued within thirty (30) days. The target is 100%. Section 3305.5 of Title 3, “Elections and Ethics”, of the Regulations of the Board of Elections requires the Director of Campaign Finance to respond in writing within thirty (30) days of the acceptance for review of a request for an interpretative opinion. The corresponding Workload Measure is the “Total number of Interpretative Opinions and Expedited Advice issued”. The OCF collects data to evaluate this measure from the monthly activity reports of the Office of the General Counsel, which include the number of requests received and issued; and is based upon the

records of the General Counsel which docket the date of receipt of the request, and assign a number that identifies the calendar year of receipt and the sequential order in which the request was received, and the date the Interpretative Opinion is issued and published at the OCF Website. The OCF determines whether the target of issuance within thirty (30) days was achieved from comparing the date of actual receipt against the date the opinion was issued, using the afore-mentioned sources.

- c. Percent of expedited advice for time-sensitive election related matters issued within fifteen (15) days of request. The target is 100%. The corresponding Workload Measure is the “Total number of Interpretative Opinions and Expedited Advice issued”. The OCF collects data to evaluate this measure from the monthly activity reports of the Office of the General Counsel, which include the number of requests for “Internal Queries” received and issued; and is based upon the records of the General Counsel which docket the date of receipt, assign an advice number that includes the calendar year of receipt and the sequential order in which the request was received; and the date the advice is issued in writing. The OCF determines whether the target of issuance within fifteen (15) days was achieved from comparing the date of actual receipt against the date the advice was issued, using the afore-mentioned sources.
- (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 Workload Measure and one Key Performance Indicator)
- a. Percent of new candidates and treasurers who receive mandatory training. The corresponding Workload Measure is the “Total number of mandatory training conferences conducted. The target is 100%. D.C. Official Code § 1- 1163.04 (7A) requires the candidates and treasurers of each committee to enroll in mandatory training at the OCF upon their registration. The objective of the measure is to measure the actual compliance with the mandatory training requirement and ensure that each new registrant receives training on the reporting requirements of the Campaign Finance Laws. The OCF collects data to evaluate this measure from the monthly activity reports of the Public Information and Records Management

Division, which states the number of new candidate and committee registrations received during the coverage period, based on information stored in the OCF Database, the names of the participants, and the dates of the entrance conferences conducted. At registration, each new candidate and the treasurer of each new committee, is scheduled for mandatory training. At the conclusion of the training, the participant is issued a Certificate of Completion. The OCF maintains an attendance sheet and copies of the executed certificates in its records. The names of the participants are published at the OCF Website. To validate the actual number of entrance conferences conducted, the OCF generates a list of the new registrants from the OCF Database and compares it to the roster of entrance conference attendees, the executed certificates, and the monthly production reports of the Agency.

- (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 Workload Measures and 2 Key Performance Indicators).
  - a. Percent of financial reports reviewed, evaluated, and analyzed before the next filing deadline. The target is 100%. D.C. Official Code § 1-1163.03 (a)(1)(H) authorizes the Director to make audits and field investigations from time to time of the financial reports filed under the Act. The corresponding Work Measure is the “Total number of financial reports reviewed, evaluated, and analyzed for the reporting period”. The objective is to review each report filed for complete and accurate reporting to ensure full disclosure before the next reporting deadline. The outputs and outcomes of this Performance Indicator are determined based upon the actual number of desk audits completed before the next filing deadline of the financial reports filed on the preceding filing deadline. To monitor this measure, the Agency collects the actual number of financial reports received as reported in the OCF Database, the listings of financial reports referred by the Public Information Division to the Audit Division for review, and the actual number of desk reviews conducted by the Audit Division as maintained in the Division Records and reported in its monthly production statistics provided to the Board of Elections and published at the OCF Website. To validate the data, the Agency compares the number of actual reports received as captured on the

OCF Database, the listings referred by the PIRM Division to the Audit Division for review, and the monthly activity statistics of the Audit Division.

- b. Percent of periodic random audits conducted within sixty (60) days of initiation. The target is 100%. D.C. Official Code § 1-1163.03 (a)(1)(H) authorizes the Director to make audits and field investigations from time to time of the financial reports filed under the Act. The corresponding Work Measure is the “Total number of periodic random and full field audits completed by the Audit Division”. The objective of the measure is to obtain full and complete disclosure of campaign operations through the audit process in a timely manner. To monitor this measure, the Agency researches and collects the actual number of audits conducted based on the monthly production statistics of the Audit Division which report the status of all ongoing audits, the letters of notification to filers of the initiation of audits, the actual number and date of Audit Reports issued by the Director and published at the OCF Website, and the Agency monthly production statistics presented to the Board of Elections and published at the OCF Website. To validate the data, the Agency compares the number of Audit Reports approved by the Director and published at the Website with the OCF monthly production statistics which include the Audit Division statistics, and the audit notification letters.
- (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. (Two Workload Measures and Two Key Performance Indicators)
- a. Total number of financial reports filed electronically and “Total number of financial reports filed.” The Key Performance Indicator is the “Percent of financial reports filed electronically.” The target is 100%. D.C. Official Code § 1-1163.04 (1A) requires the submission of all financial reports online at the OCF Website, unless an exception to this requirement is granted. The OCF collects data from which to monitor the performance of this measure from the OCF Database which receives and stores the online submission of financial reports on the required due dates. The OCF generates from the Database a list of the required filers for the various report dates

based on the number of active committees registered with the Agency, a list of the reports received electronically, a list of the paper submissions of those registrants granted an exception from the mandatory requirement, and the list of those registrants who failed to file. The total number of required filers from each filing due date, the number of electronic submissions, and the number of failures to file, or requests for extensions are reported in the monthly activity report of the Public Information Division and included in the monthly production report of the Agency provided to the Board of Elections and published at the OCF and BOE Websites. The performance data is validated through the comparison of the list of the online submissions generated by the OCF Database with the list of the required filers and the paper submissions.

(5) Create and maintain a highly efficient, transparent and responsive District Government.  
(1 Key Performance Indicator)

- a. Percent of Investigative matters closed within ninety (90) days of opening. The target is 100%. The objective of the Office of the General Counsel is to investigate and resolve complaints within ninety (90) days of receipt, unless the time is extended by the Board of Elections for good cause shown. The corresponding Workload Measure is the “Total number of Investigations completed within 90 days”. The OGC records and monitors the number of complaints received and accepted, and as well as those initiated by the Agency, the date of completion of the investigation, and the date of the entry of the Order of the Director resolving the matter. This information is collected from the monthly activity reports of the Office of the General Counsel, which include the number of complaints received and the status of all investigative matters for the period covered. At the acceptance of a complaint, the case is assigned a docket number, which notes the calendar year of receipt and the sequential order in which the complaint was accepted. The Orders of the Director are dated and published at the OCF Website, and the status of all investigations is reported in the OCF monthly statistics provided to the Board of Elections and published at the OCF and BOE Websites. The OCF determines whether the target of completion within ninety (90) days was achieved from comparing the date of

actual receipt against the date the Order of the Director was issued, using the afore-mentioned sources.

Last, the Agency introduced two (2) new Key Performance Indicators for FY 19 pertaining to the responsibilities of the Agency to administer the Fair Elections Program, namely: the “Percent of Base Amount Payments distributed within five (5) business days of the certification of a candidate into the Fair Elections Program”; and the “Percent of candidates determined to meet requirements for certification by OCF within five (5) days of filing the affidavit declaring compliance with the Fair Elections Program”.

**34. 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.

**35. Please explain the impact on your agency of any legislation passed at the federal level during FY18 and FY19, to date, which significantly affected agency operations.**

**RESPONSE:**

The Office of Campaign Finance is unaware of any legislation passed at the federal level during FY18 and FY19, to date, which would impact upon this Agency.

**36. Please identify all electronic databases maintained by the Agency, including the following:**

- a. A detailed description of the information tracked within each system; and**
- b. The age of the system and any discussion of substantial upgrades that have been made or are planned to the system.**



**RESPONSE:**

**a. A detailed description of the information tracked within each system;**

i) The agency tracks the following information listed below for all filer types:

- a. Registration statements
- b. Reports of receipts and expenditures
- c. Financial statements
- d. Reporting deadline compliance; and
- e. Hard copy filings for all filer types

Using the e-Filing System, the Agency also tracks Campaign Finance Enforcements in the form of Informal hearings, Complaints, Interpretative Opinions, and Audit Reports for all the filer types listed above.

ii) The agency also maintains and tracks the following electronic information through search features which are accessible by the Public:

1. Contributions and Expenditures of political committees and constituent service programs by amount, contributor, recipient, date, location, payer, and payee
2. Electronic disclosure of Registrant Statements of political Committees and Constituent-Service Programs
3. Affiliated Entity Search
4. Active Committees Search
5. Active Candidates Search
6. Quick Statistics
  - 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

1. Independent Expenditure Committees
- m.
- iii) 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
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.**

1. The Electronic Filing System (EFS) is about 16 years old. This 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 that will enable the public to download the reports of receipts and expenditures for political committees, citizen-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 will be compatible for all browsers, including IE6.0 and above, Firefox, Safari and Chrome.

7. Additional Filer types (Exploratory, Transition Committees, Legal Defense Committees, and Inaugural Committees and Independent expenditure committees) have been added to the OCF e-Filing System – July 2013.
8. Reports and Summaries for Citizen-Service Program were implemented - August 2014.
9. Reports and Summaries for Senators and Representatives – August 2014.
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.

20. Enabled Excel upload of contributions and expenditures for PCC, PAC, and CSP.
21. Capability added to the E-Filing System to allow the filing of consolidated reports for selected filers at the approval of the Audit Division.
22. “Schedule A4 – Transfers from Authorized Committees” implemented for the filer types below – Moved to Production January 29, 2016
  - i. Political Action Committee
  - ii. Initiative
  - iii. Referendum
  - iv. Recall
  - v. Transition Committee
  - vi. Inaugural Committee
  - vii. Exploratory Committee
  - viii. Independent Expenditure Committees
23. Biennial Report Enhancement – Moved to Production January 31, 2019. The Biennial Report now includes a chart for top three committees by Contributions.
24. Enhanced “Flagged Contributions” module. Previously this module identified all the contributions that contributed more than allowed limits by filer name. This has been enhanced to match contributors by similar sounding names as well as by contributor’s address.
25. Implemented address validation to force the filers to enter proper address as present in the USPS address database.

During FY 19, once funding becomes available, the Office of Campaign Finance will requisition the procurement of the design and development of an E-filing and Disclosure System capable of receiving financial reports online under the Fair Elections Program, and the upload of supporting documentation (bank statements, deposit slips, loan documents, and contributor receipts and certifications), with data entry/excel upload of contribution and expenditure information, with the following Schedules:

#### **RECEIPT/CONTRIBUTOR SCHEDULES**

- (a) Schedule A – to itemize receipts from District Resident individuals, reporting address, telephone number, occupation, principal place of business, amount of contribution, and date of receipt, with limits on amounts
- (b) Schedule A-1 – to itemize receipts from non-resident individuals, reporting address, telephone number, occupation, principal place of business, amount of contribution, and date of receipt, with limits on amounts

- (c) Schedule A-2 – to itemize the receipt of public funds, identifying base amounts and matching funds, with date of receipt
- (d) Schedule A-3 – to itemize the receipts from Fair Election Committees/Member organizations
- (e) Schedule A-4 – to itemize receipts from Candidate/ Candidate’s immediate family member, reporting date of receipt, amount, name and address, occupation, employer

**\*ALL CONTRIBUTOR/RECEIPT SCHEDULES MUST HAVE THE CAPACITY TO REJECT OR PRECLUDE THE REPORTING OF ITEMS WHERE ALL INFORMATION IS NOT PROVIDED, OR THE CONTRIBUTIONS EXCEED THE CONTRIBUTION LIMITS OR LOAN LIMITS, OR ARE FROM A PROHIBITED SOURCE, AND TO AGGREGATE RECEIPTS FROM CONTRIBUTORS FROM REPORT TO REPORT, AND TO AGGREGATE THE TOTALS ON EACH SCHEDULE AND CARRY FORWARD TO THE DETAILED SUMMARY PAGE AND SUMMARY PAGE.**

## **EXPENDITURE SCHEDULES**

- (a) Schedule B – Expenditures/Specified Purposes, to itemize the expenditure of funds, the amount, date, purpose, payee, address
- (b) Schedule B-1- to itemize the expenditure of public funds to purchase equipment
- (c) Schedule C- to itemize fundraiser events
- (d) Schedule D – to report loans from Candidate, Spouse, and immediate family members
- (e) Schedule E- to report refunds and returns

## **OTHER REQUIREMENTS**

- (a) The design and the development of Reports, for public and administrative use, including:
  - 1) Nine (9) month Report following the election cycle detailing the election activity -public
  - 2) Summary contribution and expenditure reports – public
  - 3) Registration Reports
  - 4) Failure to File Reports – administrative
  - 5) Filer Reports – administrative
  - 6) Statistics: Candidate and Committee quick stats – public
  - 7) Public Funds Payout Reports – Public
  - 8) Certification or revocation dates of candidates under the Fair Elections Program - public
  - 9) Contributions and Expenditures Search Feature with data download public
  - 10) Complaints and Final Orders/Informal Hearing Orders/Final Audits/public
- (b) The design and development of Forms for online submission:

- a. Fair Elections Committee Registration (Statement of Candidacy which indicates intent to seek certification as a participating candidate and Statement of Organization)
  - b. Affidavit for Candidate and Treasurer to include agreement to accept legal notices to the home address listed on the certification and to promptly notify OCF of any changes to contact information by amending the certificate
  - c. Authorization Form for Payment : electronic funds transfer form
  - d. Appeal Form
  - e. Remission Form for return of funds or equipment
  - f. Determination of Eligibility/Non-Eligibility Form with Notice of Appeal Rights
  - g. Pre-Notification Reminder of the due dates for the filing of reports and delinquency letters
  - h. Contribution with signature and Certification Form
- (c) The System must have the capacity to track Qualified Small Dollar Contributions progress toward meeting threshold requirements as reports are filed during qualifying period, and to determine when qualifying thresholds are met, to aggregate the dollar amount of QSDC, and the number of QSDC to determine if minimum requirements met. System should maintain a running tab of totals of number of contributions from qualified small dollar contributors.
- (d) The System must calculate the caps for the matching fund payments for each election cycle, and the payments due participating candidates.
- (e) The System must distinguish qualified small dollar contributions from non-District resident contributors.
- (f) The System must also identify the qualifying periods for both the primary and general elections, and the deadlines for both qualifying periods (coincides with the nominating petition deadline).
- (g) Provide for e-filing and registration by the new “Fair Elections Committee.”
- (h) Develop the filing schedule for the Fair Elections Program which must include three (3) additional dates within the 60 days before a scheduled election.
- (i) System must calculate timeframes for OCF to act to determine whether threshold requirements are met and to notify candidate and committee within the e-filing system; and for payouts.

- (j) The System should calculate 60 days plus 180 days allowed for the remission of funds and equipment with pre-notification reminder letters triggered on the date following each election or the revocation of a certification.
- (k) The System must track for the post-election report: the certification dates (revocation dates and basis); number and date on which QSC were submitted for certification; lists of base amount and matching payments; summary contribution and expenditure lists compiled for each report date to form basis for final election report; list of qualified small dollar contributors with contributor information; list of small dollar contributions \$200 or less received by non-participating candidates; list by participating candidates of remission of funds; and list by participating candidates of personal funds contributed.
- (l) The content of the Office of Campaign Finance Website must be revised to incorporate the Fair Elections program in all existing information as an option to the traditional financing of campaigns, and to introduce brochures, training materials, and guides to fully educate the public about the availability of public financing.

Last, the Audit and Legal Divisions maintain internal databases to track production and activity. The Audit Branch maintains a database of all Requests for Additional Information sent, and a system to note all responses received; a database for all audits conducted along with the audit fieldwork; a Business Entity database; and Flagged Contribution reviews. The Office of the General Counsel maintains a post hearing, post order schedule in its database which reflects the due dates for the following legal procedures: Motions for Reconsideration; Petitions for review by the Board of Elections; and Petitions for enforcement of a judgment in the District of Columbia Superior Court.

**37. Please provide a detailed description about any new technology acquired in FY18 and FY19, to date, including the cost, where it is used, and what it does. Please explain if there have been any issues with implementation.**

**RESPONSE:**

During FY18 and FY19, the following upgrades were developed and added:

- **Cash on hand validation**

When filing an amendment, if the Cash on hand at the end of the reporting period is not equal to the Cash on hand at the beginning of the reporting period of the succeeding report if present, display a warning message to the filer to submit an amendment for the subsequent report.

- **Filer Reports Additional Information**

All the candidates that appeared on General Election Ballot are required to submit 8 day pre-general election report. The reporting period begin date of 8 day pre-general election report and the December 10th report are the same. This results in the filer reporting duplicate entries. To fix this problem, a new feature was implemented to create a special December 10th report with a different beginning date for the candidates that appeared on the General Election ballot. To achieve this, an option was provided for the e-Filing Admin to provide additional information about the filer reports. This information will appear as informational message when the filer selects the report to file.

- **Update Filer Email address**

Provide an option for the filer to update the email address to receive notifications. The filer will be able to update any email address in the Committee Registration and also select which email id will receive all email notifications.

- **Debts and Loans Screen Redesign**

Redesign the debts and repayments screen to be more user friendly and to prevent the filer from modifying a loan information entered in a previous reporting period. When the filer clicks on a previous loan, the system will display a popup with a note saying that the filer will not able to modify the loan information along with information on which report the loan originated.

- **Data Download Changes**

The data download excel and CSV export modules were enhanced to split name into First Name, Middle Name, Last Name and Organization name. Address field will be split into Address, City, State, and Zip code. This change will be present only the XML, CSV, and Excel export files.

- **E-Filing Feedback Form**

A Feedback form was added to the e-Filing Success screen to encourage filers to provide feedback about the e-Filing System. Also includes an admin module for the OCF e-filing admin to view the feedback received

### **Cost Details**

<b>Task</b>	<b>Cost</b>
FY2018 Maintenance and Technical support	\$ 55,476.00
Enhancements to e-filing System based on Survey results	\$ 26,608.50
FY2019 Maintenance and Technical support	\$ 55,312.64
<b>Total</b>	<b>\$ 137,397.14</b>



**38. Please describe how OCF uses social media to engage the public and disseminate information.**

**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.

The Office of Campaign Finance established the Agency 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.

During FY18, and FY19, to date, OCF posted 41 messages on its Facebook Page, and five hundred and four people were reached; and tweeted 100 messages on the Twitter Account, with a total of 66 following and 112 followers.

**39. Who does OCF view as its stakeholders?**

**RESPONSE:**

The Office of Campaign Finance views the residents of the District of Columbia who comprise the electorate as its primary stakeholder, and anyone else viably connected to the political

process in the District of Columbia, the public, candidates, committees, office holders, treasurers of committees, and contributors. The Agency is committed to serve our stakeholders fairly and effectively because we believe the District of Columbia community deserves exemplary service from the agency which performs such a critical function in the electoral process.

**a. How does OCF solicit feedback from its stakeholders to improve the website's functionality?**

**RESPONSE:**

The Office of Campaign Finance employs online surveys at the OCF Website to elicit feedback from the public on the services, features, and information it provides at the OCF Website. For example, as the result of the responses from the 2009 Online Survey, it was recommended that the OCF Website be made compatible for all the industry standard browsers, and that the requirement for the submission of paper reports be eliminated where financial reports were electronically filed. Based on these recommendations, in FY 2011, cross browser compatibility was implemented to ensure the compatibility of the Electronic Filing System Application with all browsers, including IE6.O, and above, Firefox, Safari, and Chrome. Further OCF sought legislative authority for the electronic signature, and the electronic signature functionality was introduced in FY 2010. Respondents of the first OCF Customer Service Survey, disseminated in Calendar Year 2000, strongly encouraged the use of electronic filing. The Council heeded the concerns of the Agency that notwithstanding the upgrade of the computer system at that time, timely disclosure remained hampered by the submission of hard copy documentation. Legislation providing for the electronic filing of finance and disclosure reports was subsequently enacted.

The most recent online Survey of the Website services and features was open from August 2016 to January 2017 for users of the website to participate in the survey via a popup window. A total of 26 users responded. The purpose of the Survey was to assess the effectiveness and efficiency of the redesigned OCF E-Filing Applications and Web Site to deliver information and services. 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 Website Usability Survey Report was submitted to the OCF on January 13, 2017, and the results evaluated and recommendations forwarded for enhancements to the OCF on September 26, 2017. The OCF Management Team evaluated the recommendations and approved several for implementation. See Response to Question No. 32.

As previously stated, the recommended enhancements undertaken in FY18 included a feedback form to enable filers to provide comments/feedback on their use of the OCF E-Filing System, with a rating option, and an administrative module which allows the Agency to view the feedback.

To evaluate the effectiveness of the onsite educational seminars and entrance conferences, the OCF circulates surveys to solicit feedback from participants at the conclusion of each session to determine whether the presentations achieved acceptable satisfaction ratings. Participants are invited to evaluate the thoroughness, timeliness and overall quality of the content of materials used, as well as the proficiency of agency facilitator(s), and the conduciveness to learning of agency facilities; and to suggest other subject areas for seminar coverage, or to make any other suggestion deemed to promote the efficiency or effectiveness of the OCF operations. Each evaluation form is reviewed by the training facilitator to ensure that suggestions requiring agency or programmatic consideration are transmitted for review.

The Agency has learned that citizens/constituents are actively engaged in the affairs of government, and that their knowledge, experiences and input should be considered when adopting practices and policies that affect them. In this regard, the Office of Campaign Finance continuously updates its website and seeks to improve its user-friendliness. The Agency systematically reviews the OCF regulations to develop proposed regulations to impact the practical administration and enforcement of issues facing candidates and political committees.

**40. Please explain the methods in which OCF informs the public about the conduct, activities, and financial operations of candidates, political committees, 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. All financial reports are immediately posted at the OCF website and are available real time upon submission. All Audit Reports, Investigative and Informal Hearing Orders are published at the OCF website upon issuance, and all Open Investigations and other OCF production statistics are published at the OCF Website, presented during the monthly meeting of the Board of Elections (BOE) and published at the BOE website.

During FY 18 and FY 19, to date, the Office of Campaign Finance also diversified its means of informing the public about the conduct, activities, and financial operations of candidates, political committees, Constituent Services and Statehood Funds. The agency's website provides monthly schedules of mandatory and voluntary training seminars held onsite and accessed monthly with the use of online webinars. OCF's Social Media platforms, Facebook Page and Twitter accounts allow information, content and data to be accessed in real time through posts and tweets.

More specifically, the OCF Website offers the following features and services, which are designed to provide campaign finance data in user friendly and accessible formats:

(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 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 the 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 18, 260 new members of the public elected

to use the service, and as of this date, in FY 19, there are 71 new subscribers (1455 total subscribers).

In addition, 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.

Last, the Agency informs the public about the financial operations of its registrants through the conduct of periodic and Full Field Audits, which culminates in the issuance and publication of the Audit Reports at the OCF Website for public view. During the election cycle, the Audit Division conducts periodic audits of the Reports of Receipts and Expenditures of the candidates and principal campaign committees registered for the upcoming election, and of political action committees active in an election cycle. The Division also conducts periodic random audits of constituent service programs for every other filing deadline and of continuing committees on every filing deadline. Full field audits are conducted on all newly elected officials and Inaugural Committees; and where warranted, in investigative matters. All Audit Reports are published at the OCF Website.

**41. Please describe OCF's enforcement measures and actions taken in FY18 and FY19, to date.**

**a. What enforcement measures, if any, are currently pending?**

**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.

During FY18 and FY19, to date, the OCF informal hearing process has included the following:

▪ Total Referrals	260
▪ Hearing Notices issued	336 (213 First Notices and 123 Second Notices)
▪ Hearings Conducted	83 FY2018; 67 FY 2019 To Date
▪ Orders issued	81 FY 2018; 63 FY 2019 To Date
▪ Investigations Completed	0
▪ Orders imposing fines	44 FY 2018; 19 FY 2019 To Date
▪ Amount of fines imposed	\$150, 450.00 FY2018;\$32,550.00 FY 2019 To Date
▪ Amount of fines collected	\$72,050.00 FY2018; \$9,200.00 FY 2019 To Date
▪ Fines vacated or reduced	\$8,350.00 FY 2018 FY2019 None To Date
▪ Outstanding fines	\$48,050.00; FY2018 and \$23,350.00FY2019 to date
▪ Petitions for Enforcement	30
▪ Interpretative Opinions	3

The OCF enforcement process commences when there is non-compliance by required filers to file financial reports or to provide timely responses to Requests for Additional Information. Following either the failure to timely file a required Report of Receipts and Expenditures with the Public Information and Records Management Division or the failure to provide a timely response to a Request for Additional Information to the Reports Analysis and Audit Division, the matter is referred to the Office of the General Counsel for an Informal Hearing. The Informal Hearings process may result in dismissal, imposition of fines or suspension of fines. If the respondent considers the decision by OCF adverse, he/she may file a petition for review within 15 days of receipt of an order with the Board of Elections (BOE). However, in matters in which fines have been imposed if the respondent fails to pay the fine or seek review by the BOE within the prescribed period, the OCF may file a Petition for Enforcement with the BOE. Following a referral to the BOE by a respondent or the OCF, the matter is scheduled for a pre-hearing conference to provide the parties with an opportunity for settlement. If the matter is not settled during the pre-hearing conference, a contested hearing before the BOE is scheduled. In the event that the BOE affirms an OCF decision which includes a fine and the respondent fails to pay the fine or enter into a payment plan, the Office of the General Counsel for the BOE files a complaint seeking judgment against the respondent in the Superior Court of the District of Columbia.

Currently, thirty (30) Petitions for Enforcement against respondents who either failed to pay outstanding fines or request a hearing de novo before the Board of Elections (BOE) by the due date with fines totaling \$48,050.00 were transmitted to the Office of the General Counsel for the Board of Elections on December 11,, 2017 and June 25, 2018. These cases were scheduled for Pre-Hearing Conferences on April 11, 2018, July 18, 2018 and October 3, 2018. Of the 30 cases referred, 6 cases were settled for reduced fines, 14 cases were certified by the BOE for submission to the D.C. Superior Court (all of which resulted in the Court entering judgments against the respondents). The 10 remaining cases were presented to the BOE in early FY 2019 and are ripe to seek judgment in the District of Columbia Superior Court.

A balance of \$22,000.00 in fines is due through the installment payment plan, and 8 fines were settled for reduced by a total of \$8,350.00 in accordance with a settlement agreement.

During FY19, The Office of Campaign Finance completed the following investigation:

OCF FI 2018-001	Complaint:	Craig Holman, Ph.D., October 24, 2018
	Respondent:	Re-Elect Muriel Bowser PCC
	Infraction:	Campaign Contribution Violation
	Status:	Order Issued October 31, 2018
		Dismissed

Currently, the following investigation remains open with the Office of the General Counsel:

OCF FI 2018-002	Complaint:	Emily Naden, December 4, 2018
	Respondent:	Councilmember Brandon Todd
	Alleged Infraction:	Inappropriate use of government resources
	Status:	Pending

During FY 2018, the Office of the General Counsel received and processed at least 6 Requests for Advice via e-mail. The advice was provided within 72 hours as opposed to thirty day period the office of Campaign Finance is accorded the by the Interpretive Opinion process.

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 2018, a 100 % filing rate was achieved in the Constituent Service and Statehood Fund Programs; and a 96% 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, 48 of the 48 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 632 of the required 661 principal campaign committees and political action committees filed the Report of Receipts and Expenditures (OCF Form 16).

There were 709 required filers in all of the Campaign Finance Programs: 623 timely filers; 57 late filers; and approximately 29 filers who remain delinquent. The total number of actual filers represents 96% (95% in FY17) of the total required filers who complied with the reporting requirements during Fiscal Year 2018.

**42. Please describe the agency's auditing process for receipts of contributions and expenditures.**

**RESPONSE:**

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 Agency. The Division conducts field audits and investigations based upon deficiencies and conditions noted during Desk Audit Reviews. The Division conducts periodic random field audits of the financial reports submitted in each of the OCF Programs, 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 Constituent Service and Statehood Fund Programs, candidates, political committees, political action committees, and independent expenditure committees, and all others required to file with the Agency. Section 3404, "Desk Reviews and Audits", Chapter 30 of Title 3, "Elections and Ethics," of the District of Columbia Municipal Regulations, sets forth in detail the procedures which govern the conduct and timeframes of Desk Reviews, Full Field Audits, and Periodic Random Audits.

The Office of Campaign Finance determines the validity and/or absence of information contained in financial reports through the conduct of desk reviews, full field audits, and random periodic audits. The initiation of these processes allows the Audit Division to require the

submission of the documentation, including bank account information, statements, cancelled checks, and loan documents, underlying the financial transactions and activity reported on the reports where reported information is incomplete, omitted, or otherwise requires further explanation.

Through the review of the submitted documentation, the Audit Branch is able to research and verify the accuracy of the transaction stated on the financial reports against the records of the reporting entity, and identify transactions which were not reported. For example, the research of bank statements and contributor source documents (contributor checks, contributor cards, in-kind contribution information, and credit card contribution records) may reveal deposits which were not reported as receipts on Schedule A of the Reports of Receipts and Expenditures. This non-disclosure would require the subsequent amendment of the financial reports to report the receipts and correctly state the cash on hand balances. Expenditures are traced to source documents including billing statements, invoices, memorandums, and cancelled checks. The research of bank statements and the expenditure source documents may also substantiate expenditures which were not previously reported, and for which an amended accounting will also be required. The examination of actual source documents allows verification of the purpose for which funds were expended, the exact amount expended, and the appropriateness of the expenditure for the scope of the reporting entity.

To commence the audit process, the Office of Campaign Finance notifies the treasurer of a committee in writing of the selection of a committee for audit, and requests the delivery of all underlying documentation of the audit coverage period within fifteen (15) calendar days for a periodic random audit, or within thirty (30) calendar days for full field audits. Upon the receipt of all financial records, the audit field work commences, and includes the review of all financial reports for completeness and mathematical accuracy, and the reconciliation of bank account records to the reports filed. Once the field work is completed, a Preliminary Draft audit report is issued with the initial findings and recommendations of RAAD. The Preliminary Draft audit report requires the submission of a written response, amended reports, and/or additional documentation within thirty (30) calendar days of less after receipt. The Audit Report will not be released and made available to the public until the response and accompanying documents are received and reviewed for compliance with all outstanding issues. It should be noted that the response may generate further inquiry by RAAD.

For your information, during Fiscal Year 2018, the Office of Campaign Finance conducted 844 (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 resulted in the issuance of 238 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. 206 reporting entities complied with the request of the Audit Division, and submitted the necessary information. Twelve (12) responses are due in FY 2019. The Audit Division referred twenty (20) 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 nineteen (19) committees, following the review and approval of their Final Report of Receipts and Expenditures; and completed and issued twenty-one (21) Periodic Random Audits and one (1) Full Field Audit.

During FY19, the Audit Division will conduct full field audits of all newly elected public officials and review 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 15, 2019. The Audit Division will conduct the desk review of the 309 Summary Financial Statements of ANC Candidates filed, to date, in Fiscal Year 2019

- a. Please provide an update on changes made to OCF's auditing process, if any, in response to public criticism that the process does not provide voters with relevant information about candidates in a timely manner or in order to inform their voting decisions.**

**RESPONSE:**

As the Committee was previously informed, the audit which was the source of criticism presented an unusual set of circumstances that impeded the ability of the Audit Division to complete the audit field work in a reasonable period of time. The goal of the Agency is to release an Audit report in a timely and useful manner for the public. However, the Agency must also ensure the release of a complete and accurate report. Each audit is unique, and the completion of the audit may vary dependent upon the number of receipt and disbursement transactions reported, the availability of all underlying documentation, the organization and completeness of the committee records, the audit scope and the issues that develop during the audit, and the opportunity to respond and the consideration of the responses to the draft audit.

The Agency continues to strive to adhere strictly to the timeframes of its Standard Operating Procedures where non compliance issues are noted during the audit fieldwork process, the Statement of Findings or Preliminary Audit Report. Specifically, the committee under audit has fifteen (15) days and thirty (30) days, respectively, to respond to the Audit staff's findings and recommendations enumerated within the Reports. Requests for extensions will not be granted for more than fifteen (10) days, absent extraordinary circumstances.

**43. Does OCF's system still allow filings of contributions and expenditures to be submitted with incomplete information?**

**RESPONSE:**

Currently, the filer is able to successfully submit a contribution report only where a contributor/payee's name and address are provided. Any additional information required to support the entry is provided at the direction of the Audit Branch through the issuance of a Request for Additional Information, consistent with the Standard Operating Procedures of the Division. During FY18, the Audit Branch issued 238 RFAs directed to reporting entities to advise of deficiencies noted during the review of financial reports, including the omission of contributor information. There were 19 Requests for Additional Information where the omission of the occupation and/or name of employer was noted and additional information requested. The necessary information was provided by the reporting entities. In FY19, to date, there were 7 Requests for Additional Information out of 167 issued, where the omission of the occupation and/or name of employer was noted and additional information requested.

D.C. Official Code § 1-1163.09 requires the disclosure on each report of receipts and expenditures, including at (c) (2), the “full name and mailing address, including the occupation and the principal place of business, if any” of each person who has made contributions in an aggregate value of \$50 or more to or for a committee or candidate. Further, §§ 1-1163.09 (b) and (c) (7) require that the reports are complete as of five (5) days before the date of filing, and that the filer disclose the total sum of all receipts by or for the committee or candidate during the coverage period. The purpose of the statute, as a whole, is to require the timely disclosure of all financial activity during the coverage period, and to identify the source of all receipts. Disclosure ensures the transparency of campaign operations. To prevent the submission of contributor information at filing will inhibit the timely disclosure of receipts, and risk non-disclosure. The RFAI process allows for the cure of these deficiencies.

In addition, the Office of Campaign Finance researched the practices of our counterparts in several jurisdictions to determine whether filers were prevented from reporting contributions where the contributor information is incomplete. The Agency consulted the Federal Elections Commission, and agencies with parallel responsibilities in Kentucky, Maryland, New York State, and Washington State to determine how the issue of incomplete information is resolved in those jurisdictions. Our research revealed the following:

1. **Federal Elections Commission (FEC)** – Financial reports submitted by candidates/committees are reviewed by the FEC staff to ensure that they are in compliance with the disclosure laws. The campaign committee is required to disclose the contributors who contribute \$200 or more in a calendar year or an election cycle. Reports that do not comply with the disclosure requirements (e.g. name of contributor’s employer, address, contributor’s occupation, etc.) are considered deficient. The campaign committee is notified and requested to voluntarily correct the deficiency, file an amended financial report, and/or the matter (depending on the gravity of the violation) may be referred to the Commission for enforcement.

The Commission may investigate the matter, the case is referred to the Office of the General Counsel, and if there is a finding that the law has been violated, the Commission may attempt, (1) to reach an agreement with the committee (e.g. civil fine, remedial corrections), or (2) file suit against the committee in the United States District Court.

Nonetheless, the FEC will not reject financial reports that a candidate/committee filed. The FEC will order the return of contributions that are deemed illegal. The campaign committee will not be required to refund contributions that are legally received, notwithstanding the financial report may be deficient. (11 CFR §104.1 et seq., 52 U.S.C. 30-104(a))

2. **Commonwealth of Kentucky**<sup>1</sup> – If a person contributes an aggregate amount of \$100 or more the contribution must be itemized and include the contributor’s name, address, occupation and employer (KRS Chapter 121.180 (3) (a) (2)).

If a financial report is submitted without the employer’s name, occupation, address, etc., that report is not rejected by the agency. The report is given a “pending status.” The candidate/committee is notified and instructed to file an amended report within 7-10 days. If the candidate/committee does not comply the matter is referred to the legal department for an investigation. The findings from the investigation are submitted to the Board of Directors who then will make a determination of whether to refer the candidate/committee to court for prosecution.

3. **Maryland** – The State Board of Elections conducts an audit of every campaign finance report filed to ensure compliance. Individual contributions of \$500 or more must be reported. For any deficiencies, errors or omissions in the financial report the campaign is notified and given thirty (30) days to make the corrections. If the campaign does not comply and correct the deficiencies and/or file an amended report, then it will result in the report being considered “not filed” and late fees will be assessed. § 13-327 of the Election Law Article.

**Note:** The most common deficiencies cited in Maryland are (1) missing or incomplete addresses for contributions and expenditures, (2) incorrect entries for reimbursements, and (3) a lack of explanation for certain expenditures. Employer and occupation omissions were not listed among the common deficiencies. For contributions that exceed the individual limit, the campaign/committee must return the excess amount to the donor, and an amended financial report must be filed.

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<sup>1</sup> This State is nationally recognized for best practices for State Campaign Finance Disclosure, 2010.



4. **New York State Board of Elections (NYSBOE)** – The Compliance Division of the NYSBOE is charged with reviewing all financial disclosure statements for compliance with applicable laws and regulations.

The NYSBOE/Compliance Division, advised that candidates/committees are instructed to obtain and submit identifying information on the contributors, inclusive of the name of the contributor's employer and occupation. In the event that this information is omitted the filing is not rejected. The Compliance Unit audit/reviews all reports and categorizes them as being "Compliant" (No deficiencies), "Deficient" (Missing some statutory information), and "Training" (Errors in reporting that need to be corrected).

Section 14-102 – 104 of the NY State Election Law does not specifically state that the candidate/committee must obtain the employer's identification and contributor's occupation.

5. **Washington State** – The Public Disclosure Commission (PDC), a subdivision of the State Board of Elections (SBE) has the authority to regulate financial reporting and determine whether a candidate/committee has substantially complied with the election laws. Electronic filing is the means used for filing financial reports. The electronic software that is used gives the filers a warning whenever occupational and employer information for contributors' is omitted. The PDC relies on the computer software to flag the omissions of information. Information regarding occupations and names and addresses of employers are rather common omissions. But, because the SBE routinely handles 70,000 to 100,000 filings each year the omission of occupational information and employer identification does not prevent the SBE from accepting financial reports. Washington State does not have the staff capacity to perform follow up.

However, state law (WAC 390-16-034) requires that the financial reports must indicate "in addition to the name and address of each person contributing one hundred dollars (\$100) or more, the occupation and name and address of the person's employer.

**Conclusion:** All of the agencies (federal and state) contacted, when asked stated that they do not refuse filings from candidates/committees that are deficient because the contributor's information regarding employer and occupation is not disclosed. It was the position of every agency that the candidate/committee would be notified of the deficiency and be given an

opportunity to correct the deficiency. All cases in which the deficiency was not corrected and/or resolved would be sent to the enforcement division. In addition, it was the agency's position that the candidate/committee was not required to return campaign contributions received unless the contribution was found to be excessive and/or illegal.

Going forward, the following warning message will be displayed to filers:

*Pursuant to D.C. Official Code Section 1-1163.09(c) (2), Contributor information for an individual is required to include the contributor's occupation and principal place of business, if applicable. Failure to include this information will warrant additional review of this report.*

**44. Please provide the Committee with the total amount of audits that OCF conducted in FY18 and FY19, to date. Additionally, please sort these audits by classes such as random, reported, requested, etc., and describe the results of the audits.**

**RESPONSE:**

The Reports Analysis and Audit Division completed twenty-one (21) Periodic Audits and one (1) Full Field Audit during Fiscal Year 2018, and during Fiscal Year 2019, to date, five (5) Periodic Audits. With the exception of the Audit Report of the Kenyan McDuffie 2018, which was a Non-Compliance Report, all of the Audits conducted resulted in Compliance Audits. All Audit Reports are available at the OCF Website for review by the public. Further, the Audit Branch initiated the Periodic Random Audit on September 11, 2018 of the Anita Bonds 2018 Principal Campaign Committee, and a Full Field Audit on August 29, 2018 of the Sheika Reid 4 Ward 1 Principal Campaign Committee. Both of these Audits are ongoing.

**RANDOM AUDITS CONDUCTED**

**DATE AUDIT ISSUED**

**Political Action Committees**

Republican Committee DC PAC	October 26, 2017
Metro Washington PAC	February 26, 2018
Greater Washington DC Insurance Agents PAC	March 6, 2018
Verizon Communication for Good Gov't	April 3, 2018
Food Service PAC	May 16, 2018
DC PAC (DOCPAC)	September 7, 2018
Professional Insurance Agents PAC	September 7, 2018
Lawyers for a Better Government PAC	September 7, 2018
BB&T DC PAC	September 7, 2018
DC Legal PAC	October 3, 2018

**Constituent Service Programs**

Ward 7 Constituent Services Fund	December 18, 2017
Do Something Constituents Fund CSP	December 22, 2017
Ward 4 Constituent Service Fund	February 26, 2018
Mary Cheh Ward 3 CSF	May 1, 2018
Phil's Fund for Citizen Service	July 26, 2018
Evans Constituent Services Fund	August 8, 2018
Citizen's Outreach Fund	November 7, 2018
Our Ward 5	December 7, 2018
Mayor Bowser's CSF	February 4, 2019

**Candidates in the 2018 Election Cycle**

Committee to Elect Lori Parker	November 1, 2017
Brianne for DC	March 29, 2018
Dionne for DC	April 3, 2018
Karl Racine 2018	May 9, 2018
Re-Elect Muriel Bowser Our Mayor	September 18, 2018
Elissa 2018	October 22, 2018
Kenyan McDuffie 2018	December 7, 2018

**Full Field Audits**

Vince Gray 2016	October 6, 2017
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**45. How much did OCF impose in fines in FY18 and FY19, to date, and to which entities? Of this amount, how much has been collected, from what sources, and how much is outstanding?**

**RESPONSE:**

Amount of fines imposed	\$150, 450.00 FY18:\$32,550.00 FY 19 to Date
63 Orders imposing fines	(included 54 fines imposed against Principal Campaign Committees; 4 fines imposed against Political Action Committees; 4 fines imposed against an Initiative Committee; and 1 fine imposed against an Independent Expenditure Committee).
Amount of fines collected	\$72,050.00 FY18; \$9,200.00 FY 19 to Date
Fines vacated or reduced	\$8,350.00 FY 18 FY 19 None to Date
Outstanding fines	\$48,050.00; FY18 \$23,350.00 FY19 to Date
Petitions for Enforcement	30

**a. How does OCF ensure that the imposition of fines deters unlawful conduct?**

The Office of Campaign Finance ensures that the imposition of fines deters unlawful conduct through the pursuit of unpaid fines before the Board of Elections (Petitions for the Enforcement of Orders of the Director imposing fines) in open and adversarial proceedings, and in the Superior Court of the District of Columbia. The levy of fines is publicized during the reporting of the activity of the Office of Campaign Finance at the monthly meetings of the Board of Elections, and the publication of the monthly activity report of the Agency and the Informal Hearing Orders at the OCF Website.

While OCF cannot assure that the imposition of fines will deter all unlawful conduct, the Agency uses its training seminars and mandatory entrance conferences to emphasize the importance of compliance with existing laws and regulations and the consequences of non-compliance. Specifically, we highlight the fact that fines have increased substantially and both candidates and treasurers may be personally liable for fines resulting from violations of the Campaign Finance Act. In addition, we stress the fact that all orders issued by OCF are published at our website and become a permanent part of the public record. Therefore, any fines or sanctions imposed by the OCF are exposed to both members of the public and the media immediately. Thus, a history of non-compliance irrespective of how limited or extensive can only cast one in an unfavorable light.

**46. How many committees are currently registered with OCF? How many committees have been registered with OCF each year, for the past ten years? Please break this number down by filer type.**

**RESPONSE:**

There are currently 168 Committees and Programs registered with the Office of Campaign Finance, including 92 Principal Campaign Committees; 52 Political Action Committees; 9 Constituent Service Programs; 3 Statehood Fund Programs; 4 Initiative Committees; 3 Referendum Committees; 0 Recall Committees; 4 Independent Expenditure Committees; 1 Inaugural Committee; 0 Exploratory Committees; and 0 Legal Defense Committees.

	PCC	PACs	CSP	Statehood	Initiative	Ref	Rec.	I.E.	Inaug.	Exp.
2008	51	6	0	0	1	0	0	0	0	0
2009	11	1	1	0	1	1	1	0	0	0
2010	42	15	0	0	0	2	0	0	0	0
2011	57	2	2	0	0	0	0	0	0	0
2012	53	10	1	0	2	0	2	0	0	0
2013	56	3	2	0	3	1	0	0	0	6
2014	72	11	0	0	7	0	1	0	1	4
2015	21	5	4	1	3	1	1	2	0	1
2016	38	3	0	0	4	0	1	8	0	1
2017	25	4	2	0	2	0	1	0	0	0
2018	63	3	0	0	5	3	0	3	1	0

**a. How many committees registered in FY18 or FY19, to date, by filer type?**

	<u>FY2018</u>	<u>FY2019</u>
PCC	72	0
PAC	5	0
I.E.	3	0
CSP	0	0
Init.	5	0
Ref.	1	2
Inaug.	0	1

**47. How many principal campaign committees are currently open for the purpose of retiring debt?**

**RESPONSE:**

There are currently twelve (12) principal campaign committees open for the purpose of retiring debt.

**a. How long has each committee been open, and what is the outstanding balance of each?**

<u>Committee Name</u>	<u>Registered Date</u>	<u>Total Loans</u>
2006 Orange for Mayor	06/24/2005	\$97,500.00
Orange for Chair	05/10/2010	\$70,000.00
Friends of Courtney R. Snowden	06/18/2014	\$16,000.00
Kinlow Ward 8 Strong	12/23/2014	\$9,000.00

Biddle 2012	11/08/2011	\$10,000.00
Committee to Elect Sekou Biddle At-Large	12/23/2010	\$15,000.00
Sheila Bunn for Ward 8	01/07/2015	\$44,919.42
Committee to Elect Natalie Williams	12/9/2011	\$972.08
Committee to Elect Khalid Pitts 2014	04/02/2014	\$15,000.00
Toliver for Ward 4	01/09/2015	\$5,000.00
Abraham for Ward 8	12/31/2014	\$5,026.98

**2016 Committees**

Robert White At-Large 2016	12/11/2015	\$2,031.03
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*It should be noted that all loans are loans primarily owed by the committee to the candidate.*

**b. What activities, if any, did each of these committees undertake in FY18 or FY19, to date?**

To date, none of the committees listed in the previous question reported any activity nor resolved any of their remaining debt.

**48. Please provide an update on any enhancements OCF made to its e-filing and disclosure system in FY18 or FY19, to date.**

**RESPONSE:**

In general, the most recent enhancements to the E-Filing and Disclosure System are discussed in the Responses to Questions No. 36 and 37.

**a. How has the agency used its e-filing system to flag excessive contributions upon filing?**

The agency uses multiple methods to track and identify/flag excessive contributions that span more than one coverage period in the two modules described below:

First, the Contributions Data Entry Screen allows filers to enter contribution details into the E-Filing Applications:

- a. The E-Filing System provides a warning message to the filers – when a contribution is above/exceeds the allowed limit, the system will flash a warning message to the filer. This will allow the filer to address the excessive contribution and/or research duplicate contributions if any.

- b. Address auto-complete – The address of the contributor is auto populated as the filer types. The integration of the USPS address database prevents the entry of addresses which are not available in the USPS database. The user entered address is compared against the USPS Standard Format. This feature requires the filer to accurately provide contributor information and limits the receipt of excessive contributions due to data errors in the reporting of information critical to the identification of the contributor.
- c. Contributors List and auto-complete – The filer has the option to select the name of a contributor from a pop up list where the contributor has given previously, and the system will also auto populate the name as the user types the first name or last name or organization name, if present; and will store a code for the name entered to identify similar sounding names. This prevents the duplication of contributor information and data entry errors.
- d. Previous contributor validation – The system verifies if similar contributor exists in the system by comparing the sound of the contributor's name. This prevents data entry errors and the duplication of contributor information

Second, the Flagged Contributors Module is available for administrative use only and initially lists the filers who have received contributions in excess of the limits. This screen provides a quick summary that includes the committee name, number of excessive contributions, and the total amount received in excess of the allowed limit. The Module allows contributors to be grouped by name, address, or by both name and address by aggregate amount received; and by similar sounding contributor names. The module also features an export module that enables the export of all flagged contributions to excel and the referral of the lists to the Audit Branch for further review and inquiry.

**49. Please describe OCF's records preservation policies. Did the agency make any changes to these policies in FY18 or FY19, to date?**

**RESPONSE:**

The Public Information and Records Management Division (PIRM) of the Office of Campaign Finance is the first contact that a member of the public or a prospective candidate has with the Agency. The PIRM Division is responsible for the intake of all original documents. When an individual registers with the Office of Campaign Finance as a candidate, there are several forms which must be executed, including the Statement of Candidacy (OCF Form 15) and the Request for Candidate Waiver (OCF Form 5). Further, where the candidate designates a principal

Campaign Committee on the Statement of Candidacy Form, a Statement of Organization (OCF Form 14), Statement of Acceptance of Position of Chairperson (OCF Form 1), and Statement of Acceptance of Position of Treasurer (OCF Form 2), must also be filed. These Forms constitute the entire contents of the original documents filed by a candidate. The Agency makes copies of all Registration Documents, and maintains the copies in a separate binder. The Registration Documents are also scanned and stored on a flash drive. The original documents are placed in a Folder identified for the respective candidate and their designated principal campaign committee. Once filed, the Public Affairs Manager is personally responsible for the contemporaneous data entry of all information provided in the documents into the OCF E-Filing and Disclosure System, where it is stored and available for public view at the OCF Website, [www.ocf.dc.gov](http://www.ocf.dc.gov), under the “Registration Disclosure” Search Feature. The Folder is then maintained in a locked File Room which stores all active committee folders in the Office of Campaign Finance. Public access to the Folders is available only by written request made through the PIRM staff.

The remaining financial activity reports/documents filed with the Office of Campaign Finance are submitted electronically at the OCF Website, consistent with the provisions of the Campaign Finance Act, as amended. The documents or the information contained therein are available at the OCF Website in PDF, Excel or some other format, and are relied upon as our primary source for the information reported.

The following represents the Records Retention and Disposition Schedule for the Office of Campaign Finance:

<b>DIA Number</b>	<b>Record Series Title</b>	<b>Minimum Retention Period and Final Disposition</b>
1004.1	Registration Forms	Retain for 10 years then destroy
1004.2	Financial Disclosure Statements	Retain for 10 years then destroy
1004.3	Lobbyist Reports	Retain for 10 years then destroy
1004.4	Receipts, Expenditures, Exemptions Reports	Retain for 10 years then destroy
1004.5	Audit Reports	Retain for 10 years then destroy
1004.6	Case Files	Retain for 10 years then destroy
1004.7	Statement of Economic Interest	Retain for 10 years then destroy
1004.8	Legislation Files	Retain for 10 years then destroy



**50. Please provide an update on OCF's efforts to promote compliance with the "affiliated entity" reporting requirement.**

- a. In how many instances were affiliated entities of business contributors listed in FY18 or FY19, to date? Out of how many business contributors?**

**RESPONSE:**

		FY 18	
<u>Business Contributors</u>			<u>Affiliated Entities</u>
PCC	1171		4
PAC	129		4
CSP	104		0
I.E.	5		2

		FY 19	
<u>Business Contributors</u>			<u>Affiliated Entities</u>
PCC	136		0
PAC	40		1
CSP	34		0
I.E.	3		1

- b. What plans does OCF have in the remainder of FY19 to enhance compliance with this requirement?**

**RESPONSE:**

During FY18 and FY19, to date, and going forward, the Office of Campaign Finance will continue to intensify its efforts to promote compliance with the "Business Contributor" Rule. The Agency expanded 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 onsite at their facilities concerning the "business contributor" disclosure requirement to promote a clear understanding of the applicable provisions of the current laws and regulations. Further, the Agency incorporated Training Seminars specific to "Contributions by Business Entities" in its 2018 and 2019 Training Calendar; and developed a Website Training for Business Contributors on OCF Form 32.

The reporting requirements of contributions received from business contributors is 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. During the training sessions, the filing community is instructed that each business entity must identify for the committee at the time of contribution each one of its affiliated entities which have also contributed to the committee, and certify 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 that it is the responsibility of the committee to collect and disclose the information on its reports of receipts and expenditures. The Audit Branch uses the Request for Additional Information Program to require filing entities which report business contributions to submit OCF Form 32 for review, and thereby verify compliance with the Business Contributor requirement. The Office of Campaign Finance modified the E-Filing Applications to provide a warning message that appears on the Screen when one is about to enter a business contribution which reminds the filer that “you are required to list the name of any affiliated entity that has also made a contribution to the committee.”

Lastly, the Office of Campaign Finance following each filing deadline, commencing with the October 10, 2018 due date, has conducted the random sample of the reported contributions of at least fifty (50) “Business Contributors” from each financial report to verify that the contribution does not exceed the contribution limitation. The Agency compares the sample to information included in publications and additional resources which identify business affiliates to determine whether any affiliated persons or entity of a business contributor has also contributed to the same committee. It should be noted that due to the small number of Business Contributors in FY18 and FY19, to date, the Office of Campaign Finance has verified the status of all Business Contributions.

Notwithstanding the efforts of the Agency, the Business Contributor bears the primary responsibility to disclose information regarding affiliated persons or entities to committees, which are then required to report same.

The breakdown of contributor data during FY18 and FY19, to date, follows:

**FY 2019**

Total Contributors – 4,858, to date

Individual Contributors – 4,664 (96% of Total Contributors)

Business Contributors – 194 (4% of Total Contributors)

Individual Contributions to PCCs (FY 2019: 10/1- 1/31/19)

2982

Individual Contributions to PACs (FY 2019: 10/1/ - 1/31/19)

1682

Business Contributions to PCCs (FY 2019: 10/1/ - 1/31/19)

147

Business Contributions to PACs (FY 2019: 10/1 – 1/31/19)

47

**FY 2018**

Total Contributors – 21,794, to date

Individual Contributors – 20,494 (94% of Total Contributors)

Business Contributors – 1,300 (6% of Total Contributors)

Individual Contributions to PCCs (FY 2018: 10/1/17- 9/30/18)

17,080

Individual Contributions to PACs (FY 2018: 10/1/17 – 9/30/18)

3414

Business Contributions to PCCs (FY 2018: 10/1/17 – 9/30/18)

1171

Business Contributions to PACs (FY 2018: 10/1 /17– 9/30/18)

129

- c. 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.

**d. How many reports of affiliated entities were there by campaigns?**

**RESPONSE:**

The following Principal Campaign Committees reported affiliated entities:

Anita Bonds 2018 (1)  
Mendelson for Chairman 2018 (1)  
Re-Elect Muriel Bowser Our Mayor (2)

**e. How many were found later by OCF during its review?**

**RESPONSE:**

The Office of the General Counsel’s business contributor verification process yielded the following results:

**FY 2018 Business Contributors Total**

888 business contributors were researched

74 business contributors were determined to have affiliated entities

16 business contributors with affiliated entities and possible excessive contributions were referred to the Audit Branch for further inquiry

**October 10<sup>th</sup>, 2017 R&E Report:**

- 12 business contributors
- 2 affiliated entities
- 0 possible excessive contributions

**December 10<sup>th</sup>, 2017 R&E Report:**

- 10 business contributors for PACs
- 0 affiliated entities
- 0 possible excessive contributions
- 155 business contributors for PCCs

- 6 affiliated entities
- 6 possible excessive contributions

**January 31<sup>st</sup>, 2018 R&E Report:**

- 189 business contributors
- 10 affiliated entities
- 6 possible excessive contributions

**March 10<sup>th</sup>, 2018 R&E Report:**

- 153 business contributors
- 6 affiliated entities
- 3 possible excessive contributions

**June 10<sup>th</sup>, 2018 R&E Report:**

- 324 business contributors
- 37 affiliated entities
- 1 possible excessive contribution

**August 10<sup>th</sup>, 2018 R&E Report:**

- 45 business contributors
- 13 affiliated entities
- 0 possible excessive contributions

**FY 2019 Business Contributors to Date**

259 business contributors were researched

102 business contributors were determined to have affiliated entities

14 business contributors with affiliated entities and possible excessive contributions were referred to the Audit Branch for further inquiry

**October 10<sup>th</sup>, 2018 R&E Report:**

- 88 business contributors
- 23 affiliated entities
- 5 possible excessive contributions

**8 Day Pre-General Election Report (Oct. 29<sup>th</sup>, 2018):**

- 61 business contributors
- 15 affiliated entities
- 1 possible excessive contribution

**December 10<sup>th</sup>, 2018 R&E Report:**

- 32 business contributors
- 11 affiliated entities
- 1 possible excessive contribution

### **January 31<sup>st</sup>, 2019 R&E Report**

- 5 business contributors for PCCs
- 1 affiliated entity
- 2 possible excessive contributions
- 73 business contributors for Inaugural Committees
- 52 affiliated entities
- 5 possible excessive contributions

### **Total to Date (including January 31<sup>st</sup>, 2019 R&E Report findings) for FY 2018-2019:**

- 1,147 total business contributors
- 176 business contributors with affiliated business entities
- 30 business contributors and their affiliated entities were referred to the Audit Branch because of possible excessive contributions and for further inquiry

**51. To what extent does OCF view its mission as that of proactively making recommendations for improving the District's campaign finance laws and evaluating national best practices?**

### **RESPONSE:**

The Office of Campaign Finance has always viewed its mission proactively. In this regard the agency invites the participation of members of the community and public interest organizations to provide recommendations on how the agency may become more efficient and effective. Agency management often consults the Brennan Center for Justice for guidance on trends in Campaign Finance and Ethics Laws on a national level. In addition, the Agency makes recommendations when appropriate to the Council of the District of Columbia regarding legislation required to bring the District into compliance with Federal law.

In addition, the agency established a Fair Elections Coalition group which included OCF managers and individuals and organizations who were the principal advocates of public financing of political campaigns in the District of Columbia who worked diligently to advance the legislation that created the Fair Elections Program. OCF continues to collaborate with the group to develop regulations and best practices which will result in a successful program that will eliminate financial barriers and increase opportunities that will allow residents to become more engaged in the political process.

Accordingly, the Agency intends to submit during FY19 proposals to the Council of the District of Columbia from our collaborative efforts for review and hopefully implementation through amendments to the current law.

**52. How does OCF stay on top of national trends in campaign finance?**

**RESPONSE:**

The Office of Campaign Finance relies on numerous resources including the Federal Elections Commission, Brennan Center for Justice, Council on Government Ethics Laws, the National Association of Administrative Law Judiciary and as a result of the proximity to the U.S. Congress, national news is also local news in the District of Columbia and “Campaign Finance Reform” is a frequent topic of discussion on Capitol Hill. In addition OCF conducts independent research to determine what trends are emerging in other jurisdictions.

The RAAD attends webinars with trending campaign rules and regulations on all levels. The Office of Campaign Finance works diligently to remain on top of and abreast of national campaign finance trends. OCF is developing a partnership with the Federal Elections Commission, specifically with the FEC’s Audit Division. In addition, the agency has forged working relations with local and state Campaign Finance agencies across the county, including with campaign finance agencies located in Annapolis, Maryland, New York, New York, and Connecticut. Several of the OCF Managers attended the 2018 COGEL Conference in Philadelphia, Pennsylvania. Managers routinely research changes in campaign finance laws and search out what’s trending in government organizations and on social media sites.

**53. Please provide an update on the implementation of the Fair Elections Program.**

- a. When will the newly hired Program Manager begin work?**
- b. When does the agency expect to hire and onboard the Chief Technology Officer?**
- c. Are the necessary e-filing upgrades complete?**
- d. Is the agency prepared for candidates to begin filing as participating candidates?**
- e. How has the agency conducted outreach and community engagement regarding the Program? What further plans does the agency have to do so?**
- f. Please provide an organizational chart for the Program staff.**

**RESPONSE:**

- a. When will the newly hired Program Manager begin work?**

Erick L. Jackson was hired as the Fair Elections Program Manager on January 6, 2019.

**b. When does the agency expect to hire and onboard the Chief Technology Officer?**

Interviews for the Chief Technology Officer were held on January 23, 2019. A candidate was selected and forwarded to the Department of Human Resources.

**c. Are the necessary e-filing upgrades complete?**

No, temporarily upgrades are being made to the current e-filing system to accommodate potential filing candidates in the Fair Elections Program. No candidates have registered for the Fair Elections Program to date. However, the next filing date is July 10, 2019 and we could see some registration activity prior to that date.

**d. Is the agency prepared for candidates to begin filing as participating candidates?**

Yes, a candidate registration form has been created. Candidates are now able to register for the Fair Election Program. To date no candidates have registered for the Fair Elections Program.

**e. How has the agency conducted outreach and community engagement regarding the Program? What further plans does the agency have to do so?**

To better inform the District residents of this significant change in the Campaign Finance Laws, the Office of Campaign Finance will present the highlights of the Fair Elections Program at Advisory Neighborhood Commissions meetings over a five month period beginning in April 2019. The office will also conduct monthly training session, webinars and use social media platforms to inform the community that the program is available for the 2020 election cycle.

**f. Please provide an organizational chart for the Program staff.**

See OCF Attachment A, the Office of Campaign Finance Organizational Charts for each OCF Division.



**LIST OF OCF ATTACHMENTS**

**FEBRUARY 13, 2019**

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

**COUNCIL OF THE DISTRICT OF COLUMBIA**

## **List of OCF Attachments**

**February 2019**

### **Responses to Questions of the Committee on the Judiciary & Public Safety**

#### **Council of the District of Columbia**

ATTACHMENT A – February 2019 Office of Campaign Finance Organizational Structure and Staffing Chart, and Organizational Charts for each OCF Division (Response to Question No. 1, General Questions)

ATTACHMENT B – February 2019 Office of Campaign Finance Functional Organization Chart (Response to Question No. 1, General Questions)

ATTACHMENT C – February 2019 Schedule A for the Office of Campaign Finance (Response to Question No. 2, General Questions)

ATTACHMENT D – List of Travel Expenses by Employee for FY18 and FY19, to date (Response to Question No.4, General Questions)

ATTACHMENT E – Chart of FY18 and FY19, to date, Intra-district Transfers and Memoranda of Understanding (Response to Question s No. 5 and 8, General Questions)

ATTACHMENT F – List of OCF Purchase Card Spending for FY18 and FY19, to date (Response to Question No.7, General Questions)

ATTACHMENT G – Chart of FY18 and FY19, to date, Reprogramming (Response to Question 11, General Questions)

ATTACHMENT H – List of OCF Contracts for FY18 and FY19, to date (Response to Question No. 13, General Questions)

ATTACHMENT I – FY18 Performance Plan and Report for the Office of Campaign Finance (Response to Question No. 20, General Questions)

ATTACHMENT J – FY19 Performance Plan for the Office of Campaign Finance (Response to Question No. 21, General Questions)

ATTACHMENT K – Copy of E-Mail dated January 31, 2019 providing links to the OCF 2019 Biennial Report (Response to Question No. 23, General Questions)

ATTACHMENT L – List of OCF Employees whose salaries exceeded \$100,000 or more in FY18 and FY19, to date (Response to Question No.24, General Questions)

ATTACHMENT M – List of OCF FY18 and FY19, to date, Fine Payments Collected (Response to Question No.45, Agency Operations)

# **ATTACHMENTS**

**FEBRUARY 13, 2019**

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

**COUNCIL OF THE DISTRICT OF COLUMBIA**

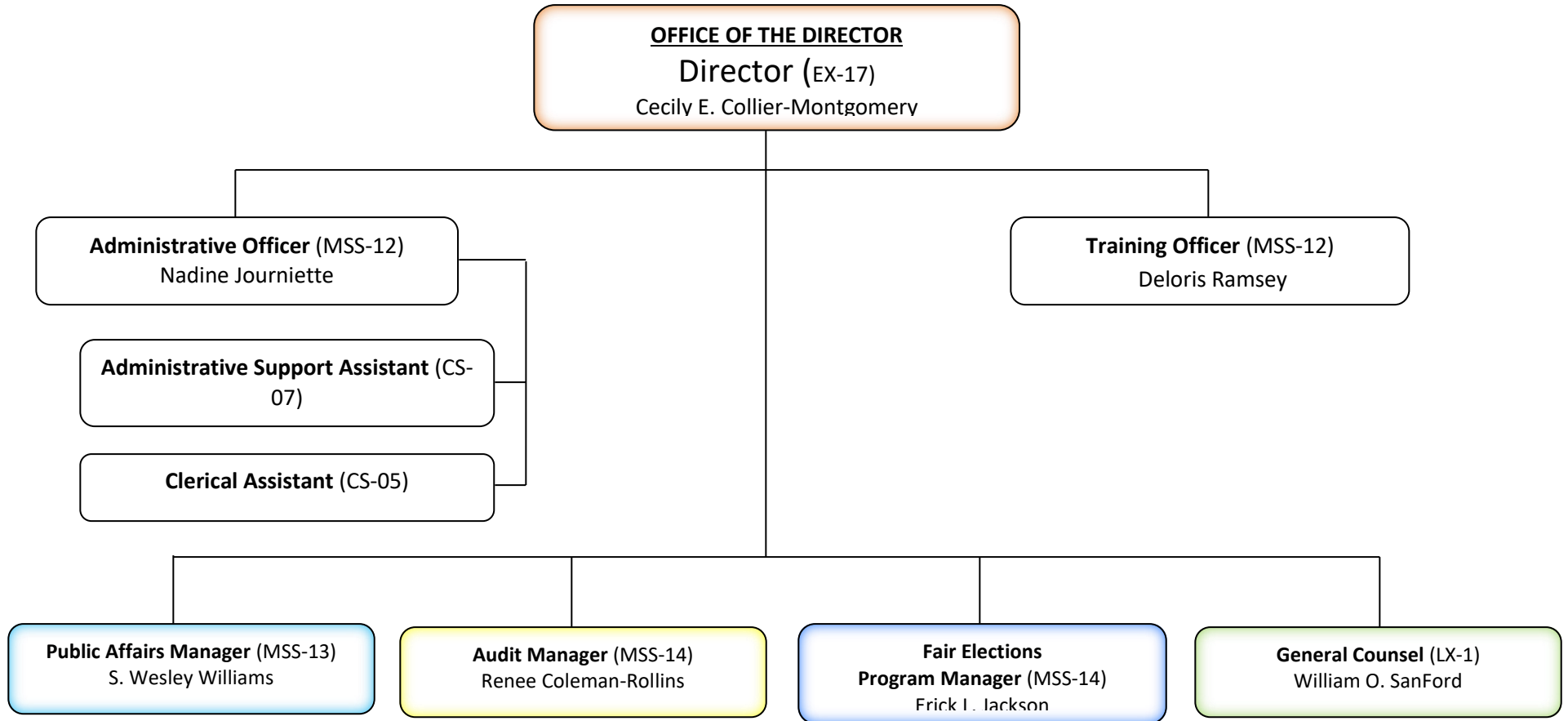
## **ATTACHMENT A**

February 2019 Office of Campaign Finance

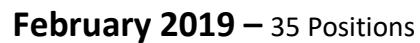
### **ORGANIZATIONAL STRUCTURE AND STAFFING CHART AND ORGANIZATIONAL CHARTS FOR EACH OCF DIVISION**

(Response to Question No. 1, General Questions)

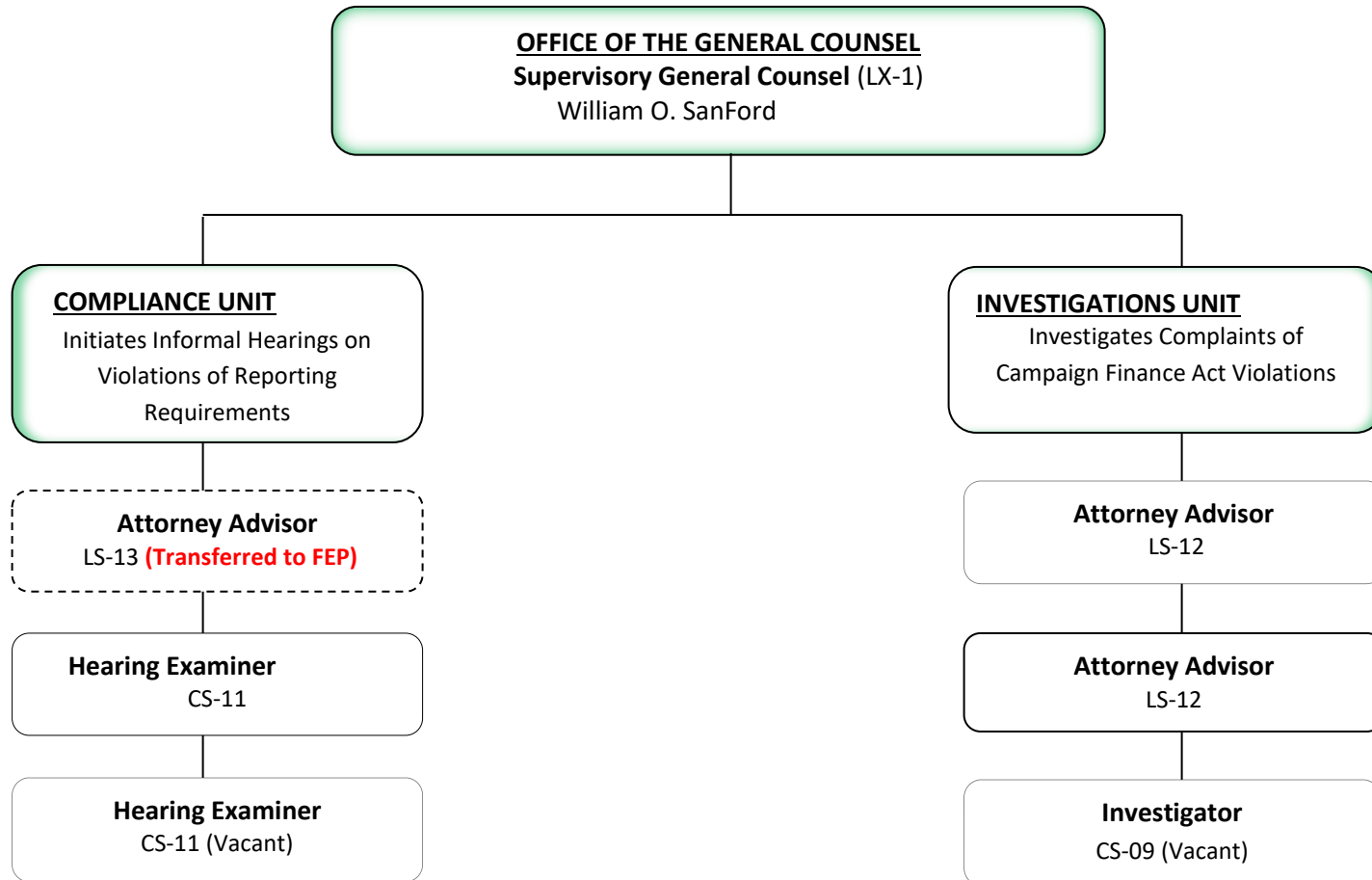
# Office of the Director



February 2019 – 5 positions

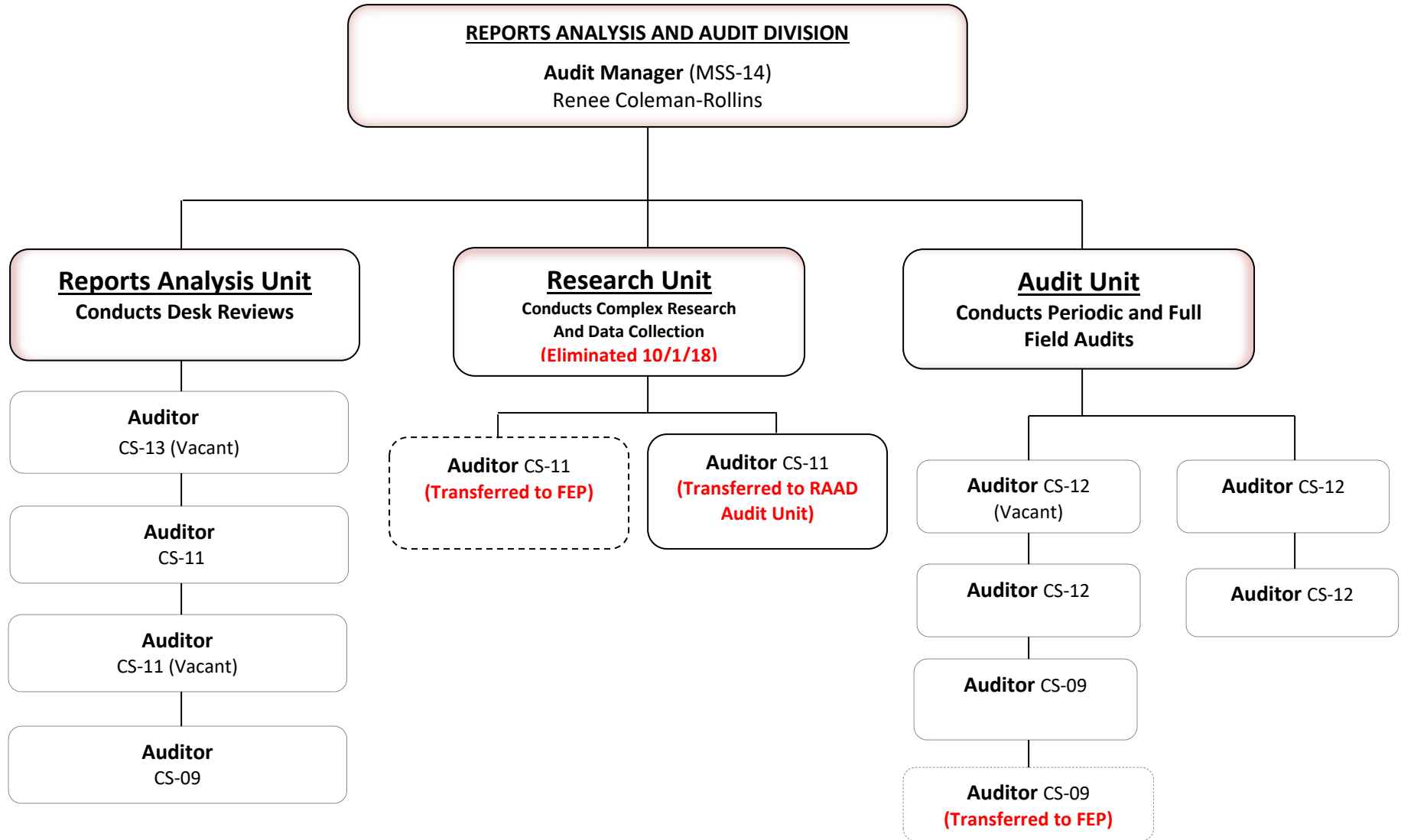


# Office of the General Counsel



**February 2019** – 6 positions (2 Vacant Positions)

# Reports Analysis and Audit Division

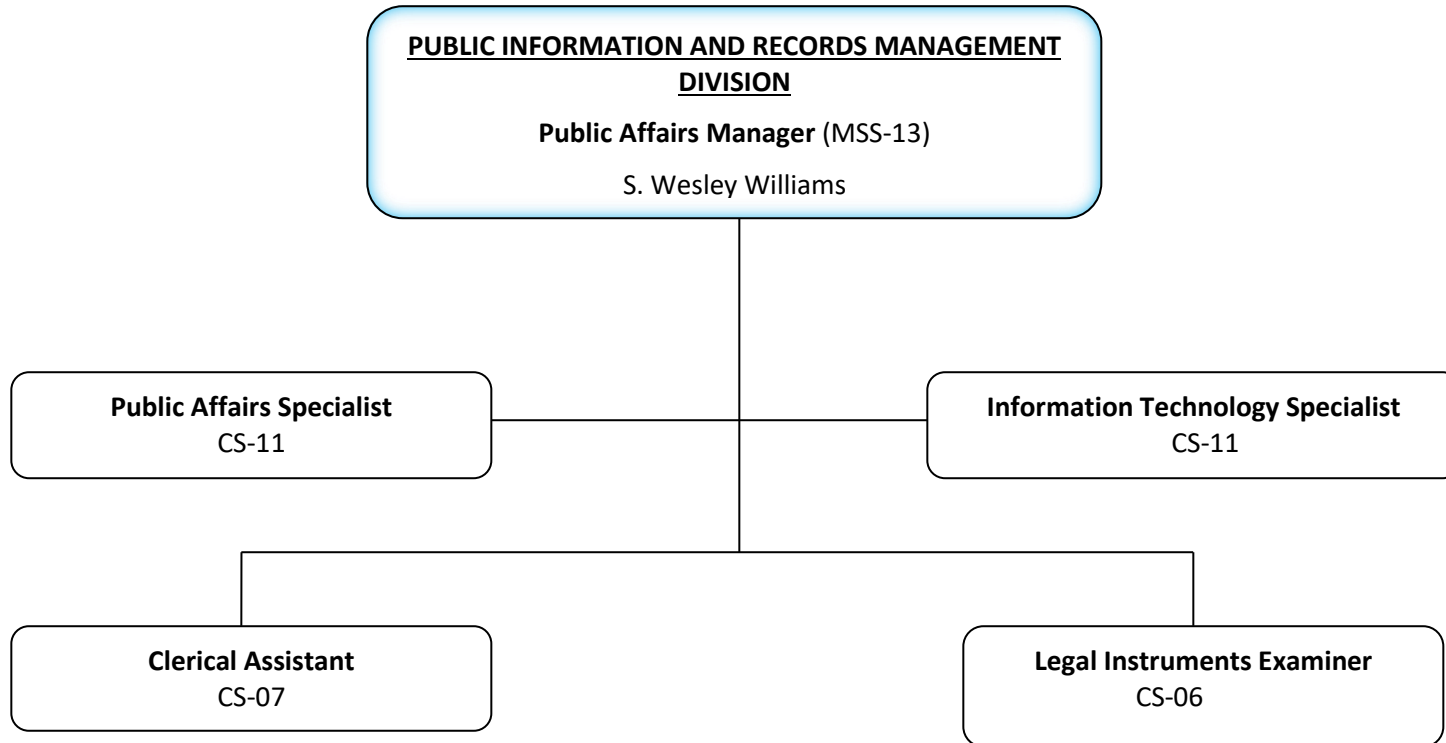


February 2019 – 11 Positions

(3 Vacant Positions in Active Recruitment: Auditor CS- 13, Auditor CS- 11 (1 Position) and Auditor CS-12 (1 Position))

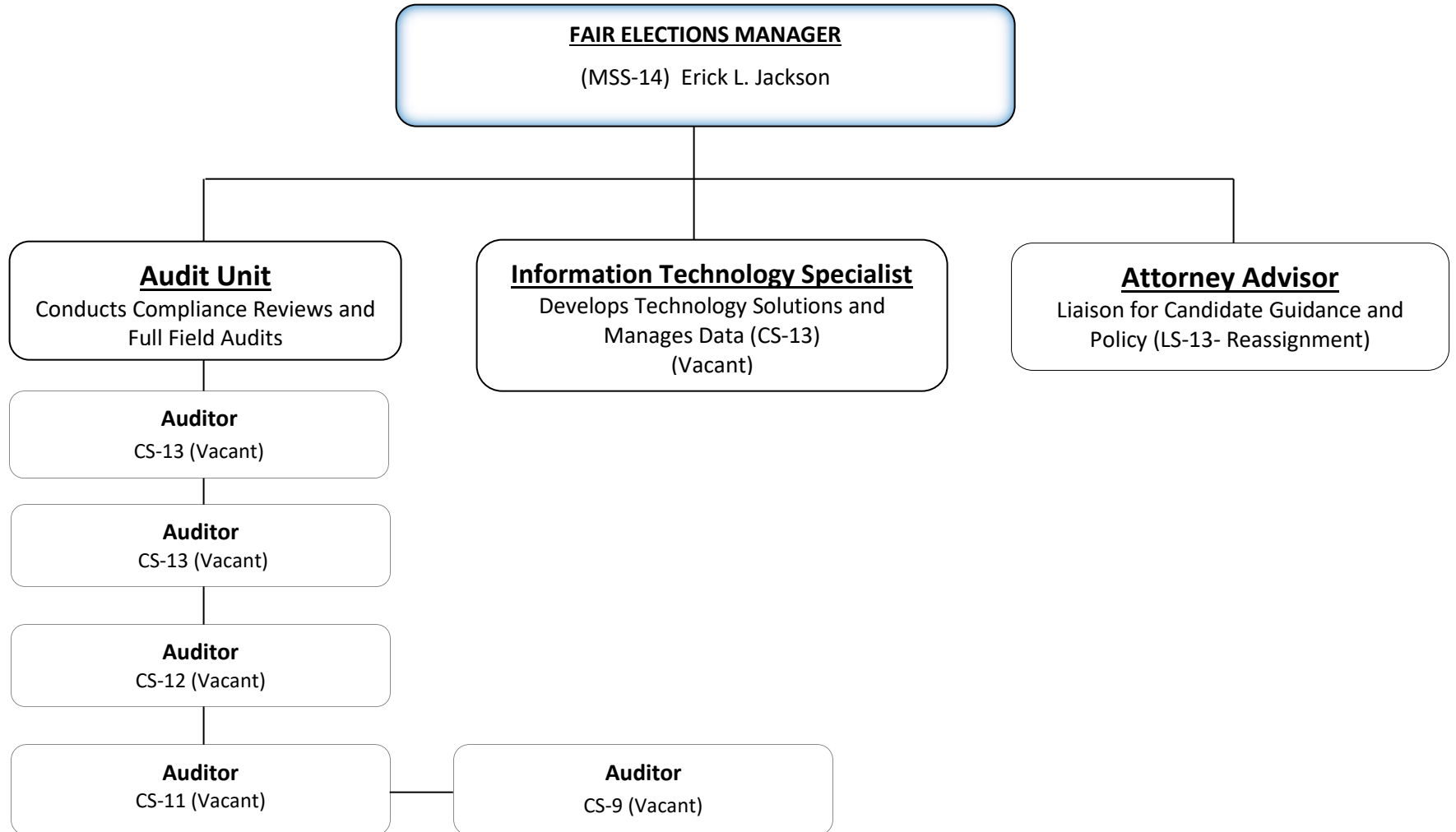


## Public Information and Records Management Division



**February 2019** – 5 positions

# Fair Elections Program



February 2019 – 8 positions

(6 Vacant Positions in active recruitment)

## **ATTACHMENT B**

February 2019 Office of Campaign Finance

### **FUNCTIONAL ORGANIZATION CHART**

(Response to Question No. 1, General Questions)

# C Office of Campaign Finance

## Functional Organization Chart

### OFFICE OF THE DIRECTOR

Administers & Enforces the Campaign Finance Laws of the District of Columbia, Quality Control Management & Policy Development

### PROGRAM OPERATIONS AND LIAISON POLICIES

Program Operations  
Budget Administration  
Contract and Procurement  
HR Management /Development  
Executive Support Services  
Payroll Administration  
Information Technology Operations  
Web Site Management  
Educational Outreach Program

### FAIR ELECTIONS PROGRAM DIVISION

Verification of Contribution Reports, Investigative and Full Field Audits of the campaign operations of Candidates, Principal Campaign Committees and Fair Elections Committees participating or seeking certification in the FEP  
Base Amount and Matching Payment Authorizations  
Educational Outreach and Liaison with FEP Candidates and Treasurers  
Coordination of the Debate Program  
Statistical Reports on the FEP Program and FOIA Requests  
RFAI Program for registrants in the FEP Program  
Referrals to OGC for Non-Compliance and Appeals before BOE from Denial Actions  
Site visits to Campaign Offices, Early Vote Centers and Election Precincts  
Remission of Funds and Equipment

### PUBLIC INFORMATION AND RECORDS MANAGEMENT DIVISION

Mandatory Electronic Filing Program  
Web Site Maintenance and Report Creation  
Help Desk for EFS and Web Site  
Document Intake, Data Entry, and Imaging  
Media Liaison, Public Information and Records Management, and FOIA Requests  
Pre-Notification and Failure to File Programs for all Filer Groups in the traditional Campaign Finance Program and in the Fair Elections Program\*  
Biennial Report of Receipts and Expenditures  
Educational Outreach  
Referrals to OGC for Non-Compliance  
\*Filer Groups in the traditional Campaign Finance Program include: Political Committees\*\*; Political Action Committees; Independent Expenditure Committees; Constituent Service and Statehood Fund Programs

### REPORTS ANALYSIS AND AUDIT DIVISION

Desk Reviews and Investigative, Full & Periodic Field Audits of Financial Reports for all Filer Groups\* in the traditional Campaign Finance Program  
Educational Outreach and Technical Assistance to the Public  
Statistical Reports and FOIA Requests  
RFAI Program for all Filer Groups\*  
Referrals to OGC for Non-Compliance  
Site Visits to Campaign Offices, Early Vote Centers, and Election Precincts  
Committee/Program Terminations  
  
\*Filer Groups in the traditional Campaign Finance Program include: Political Committees\*\*; Political Action Committees; Independent Expenditure Committees; Constituent Service and Statehood Fund Programs

### OFFICE OF THE GENERAL COUNSEL

Legislative Recommendations  
Rulemaking  
Investigations and Informal Hearings  
Legal Assistance to Director and Staff  
Educational Outreach Coordination  
Mandatory Entrance Conference Program  
Intergovernmental Liaison  
Interpretative and Expedited Opinions  
BOE Enforcement of OCF Orders  
OCF Forms Management  
FOIA Requests Coordination  
OCF Complaints before BOE  
Appeals from OCF Orders  
Site Visits to Campaign Offices, Early Vote Centers, and Election Precincts

**ATTACHMENT C**

February 2019

**SCHEDULE A FOR THE OFFICE OF CAMPAIGN FINANCE**

(Response to Question No. 2, General Questions)

**FY 19 SCHEDULE A, Current as of February 12, 2019**

List 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	Recruit ment/ Activity
<b>Agency Management Program</b>									
Office of The Director									
Director	Collier-Montgomery Cecily E.	17		0087	181,617.51	42,316.88	08/02/96	Continuing	
Training Officer	Ramsey, Deloris	MSS-12	0		88,990.99	20,734.90	08/12/13	Continuing	
Administrative Officer	Journiette, Nadine	MSS-12	0	341	79,169.21	18,446.43	01/28/13	Continuing	
Administrative Assistant	Williams, April L.	CS-07	07	303	49,595.00	11,555.64	05/17/04	Continuing	
Clerical Assistant	Alexander, Natasha	CS-05	06	303	38,081.00	8,872.87	01/08/18	Continuing	

## FY 19 Question #1 Responses (Cont'd)

List by Program and Activity of Positions by Title, Employee Name, Grade & Step, Series, Salary, Fringe Benefits, EOD, and Whether Position is Vacant or Frozen

### II. Oversight Support Program

	Office of General Counsel Activity								
Title	Employee	Grade	Step	Series	Salary	Fringe Benefits	EOD	Status Continuing/ Term/ Temporary/ Contract/ Vacant/ Frozen	Recruitment Activity
Supv. General Counsel	SanFord, William O.	LX-1		905	138,192.79	32'198.92	10/02/10	Continuing	
Attorney Advisor	Muhammad, Leonard	LS-12	3	905	97,831.00	22,794.62	01/31/11	Continuing	
Hearing Examiner	Peete, Kalvaneeta	CS-11	3	905	69,327.00	16,153.19	01/14/13	Continuing	
Hearing Examiner	Vacant	CS-11		905	59,727.00	13,916.39		Vacant as of 10/30/18	Vacancy Announcement Closed on 02/03/19.
Investigator	Vacant	CS-09	0	1810	49,570.00	12,239.91	01/28/13	Vacant as of 11/28/2018	Vacant due to Termination. Interviews to be scheduled.
Attorney Advisor	Fennell, Shaunda	LS-12	1	905	83,851.00	19,537.28	09/06/16	Continuing	

	Reports Analysis and Audit Division Activity								
Auditor Manager	Coleman, Renee	MSS-14		511	125,641.07	29,274.37	07/12/04	Continuing	
Auditor	Vacant	CS-13		511	85,149.00	24,017.29		Continuing*	Position became vacant on 01/06/19 due to Promotion. Position referred to DCHR for reclassification
Auditor	Bunaro, Beruk	CS-11	01	511	59,727.00	13,916.39	12/28/15/	Continuing	
Auditor	Steele, Michelle	CS-12	01	511	70,345.00	16,249.69	12/10/17	Vacant as of 02/01/19	Vacant due to resignation. Recruitment pending
Auditor	Afoke, Olamide	CS-.11	03	511	63,567.00	13,496.17	02/10/14	Continuing	
Auditor	Wales, Mark	CS-12	04	511	80,785.00	17,183.53	05/06/13	Continuing	
Auditor	Dufe, Eddie	CS-12	04	511	80,785.00	17,183.53	05/06/13	Continuing	
Auditor	Oliver Jr. , Michael D.	CS-12	05	511	83,078.00	17,183.53	06/23/08	Continuing	
Auditor	Vacant	CS-11	01	511	59,727.00	13,916.39		Vacant	Vacancy Announcement Closed on 01/18/19. Interviews on 02/13/19
Auditor	Savage, DeAndria	CS-09	1	511	49,570.00	11,199.99	10/01/18	Continuing	
Auditor	Wilson, Shawnta	CS-09	3	511	52,740.00	11,199.39	05/16/18	Continuing	

	Public Information and Records Management Division Activity								
Public Affairs Manager	Williams III, Sidney Wesley	MS-13	0	1035	104,700.88	24,395.31	05/12/08	Continuing	
Public Affairs Specialist	Lake, Sonya L.	CS-11	7	1035	73,167.00	17,047.91	01/18/09	Continuing	
Clerical Assistant	Scales, Billy L.	CS-7	10	301	53,873.00	11,793.48	06/30/97	Continuing	
Legal Instruments Examiner	McQueen, Laura	CS-6	9	950	47,367.00	10,087.11	01/12/04	Continuing	
Information Technology	Dua, Nimmi	CS-11	06	2210	69,327.00	15,177.01	08/31/98	Continuing	



	Fair Elections Program Division Activity								
Program Manager	Erick Jackson	MS-14	0	1035	125,642.00	29,274.59	01/22/19	Continuing	
Information Technology	Vacant	CS-13	03	905	98,794.00	23,019.00	02/19/19	Continuing	Selection made on 01/23/19. Verification of References Pending.
Attorney Advisor	Franklin ,Austin	LS-13	01	905	106,364.00	24,782.81	01/22/19	Continuing	Due to a reorganization within the agency position transferred from the OGC Division on 01/22/19
Auditor	Vacant	CS-13	0	1035	85,149.00	19,839.72		Continuing	Position closed on 02/03/19. Proposed interviews 02/28/19
Auditor	Vacant	CS-13	10	511	85,149.00	19,839.72		Continuing	Position closed on 02/03/19. Proposed interviews 02/28/19
Auditor	Vacant	CS-12	9	511	73,906.00	17,220.10		Continuing	Position closed on 02/03/19. Proposed interviews 03/01/19
Auditor	Vacant	CS-11	1	511	59,727.00	15,916.39		Continuing	Position transferred from the RAAD Division on 01/22/19
Auditor	Vacant	CS-09	1	511	49,570.00	11,549.81		Continuing	Position transferred from the RAAD Division on 01/22/19

**ATTACHMENT D**

**LIST OF TRAVEL EXPENSES BY EMPLOYEE FOR  
FY18 AND FY19, TO DATE  
(Response to Question No.4, General Questions)**

## List of Travel Expenses by Employee for FY 18, and FY 19, to date

### 1. FY 2018 Travel Expenses

(a) OCF Staff members traveled to Annapolis, MD to meet with Maryland's Campaign Finance Board to discuss the Fair Elections Board on June 15, 2018. The travel was at no cost to the agency.

(b) OCF Staff traveled to meet with New York City's Campaign Finance Board to discuss New York's Public Financing Program. The total expenses for the 5 employees who traveled were \$2,152.55.

Cecily E. Collier-Montgomery, Director	
<b>Employee traveled to New York, New York from July 18, 2018 – July 19, 2018, for a meeting in reference to New York's Public Financing Program.</b>	
<b>Cost Associated with travel:</b>	
Transportation (Amtrak)	\$167.40
Hotel (Sheraton) 2 days, 1 night	\$267.43
Per diem	\$515.46
<b>Total Expenses</b>	<b>\$950.29</b>

Erick Jackson, Fair Elections Program Manager	
<b>Employee traveled to New York, New York from July 18, 2018 – July 19, 2018, for a meeting in reference to New York's Public Financing Program.</b>	
<b>Cost Associated with travel:</b>	
Transportation (Amtrak)	\$162.00
Hotel (Sheraton) 2 days, 1 night	\$267.43
Per diem	\$129.35
<b>Total Expenses</b>	<b>\$558.78</b>

Renee Coleman, Audit Manager	
<b>Employee traveled to New York, New York from July 18, 2018 – July 19, 2018, for a meeting in reference to New York's Public Financing Program.</b>	
<b>Cost Associated with travel:</b>	
Transportation (Amtrak)	\$162.00
Hotel (Sheraton) 2 days, 1 night	\$267.43
Per diem	\$222.30
<b>Total Expenses</b>	<b>\$651.73</b>

<b>Wesley Williams, Public Affairs Manager</b>	
<b>Employee traveled to New York, New York from July 18, 2018 – July 19, 2018, for a meeting in reference to New York’s Public Financing Program.</b>	
<b>Cost Associated with travel:</b>	
Transportation (Amtrak)	\$162.00
Hotel (Sheraton) 2 days, 1 night	\$267.43
Per diem	\$283.08
<b>Total Expenses</b>	<b>\$712.51</b>

<b>Austin Franklin, Attorney Advisor</b>	
<b>Employee traveled to New York, New York from July 18, 2018 – July 19, 2018, for a meeting in reference to New York’s Public Financing Program.</b>	
<b>Cost Associated with travel:</b>	
Transportation (Amtrak)	\$162.00
Hotel (Sheraton) 2 days, 1 night	\$267.43
Per diem	\$129.35
<b>Total Expenses</b>	<b>\$558.78</b>

**2. FY 2019 Travel Expenses, to date**

*OCF Staff traveled to Pennsylvania on December 9, 2018 – December 12, 2018 to attend the Council on Government Ethics Law (COGEL) conference. The total cost for 5 employees was \$6,952.65.*

<b>Cecily E. Collier-Montgomery, Director</b>	
<b>Employee traveled to Philadelphia, Pennsylvania to attend the 2018 COGEL conference from December 9, 2018 – December 12, 2018.</b>	
<b>Cost Associated with travel:</b>	
COGEL Registration	\$600.00
Transportation (Amtrak)	\$256.00
Hotel (Marriott) 4 days, 3 nights	\$561.33
Per diem	-
<b>Total Expenses</b>	<b>\$1,417.33</b>

<b>William SanFord, General Counsel</b>	
<b>Employee traveled to Philadelphia, Pennsylvania to attend the 2018 COGEL conference from December 9, 2018 – December 12, 2018.</b>	
<b>Cost Associated with travel:</b>	
COGEL Registration	\$600.00
Transportation (Amtrak)	\$224.00
Hotel (Marriott) 4 days, 3 nights	\$561.33
Per diem	\$229.45
<b>Total Expenses</b>	<b>\$1,614.78</b>

<b>Erick Jackson, Fair Elections Program Manager</b>	
<b>Employee traveled to Philadelphia, Pennsylvania to attend the 2018 COGEL conference from December 9, 2018 – December 12, 2018.</b>	
<b>Cost Associated with travel:</b>	
COGEL Registration	\$600.00
Transportation (Amtrak)	\$256.00
Hotel (Marriott) 4 days, 3 nights	\$561.33
Per diem	\$237.50
<b>Total Expenses</b>	<b>\$1,654.83</b>

<b>Renee Rollins, Supervisory Auditor</b>	
<b>Employee traveled to Philadelphia, Pennsylvania to attend the 2018 COGEL conference from December 9, 2018 – December 12, 2018.</b>	
<b>Cost Associated with travel:</b>	
COGEL Registration	\$600.00
Transportation (Amtrak)	205.00
Hotel (Marriott) 4 days, 3 nights	\$561.33
Per diem	\$237.50
<b>Total Expenses</b>	<b>\$1,603.83</b>

Wesley Williams, Public Affairs Manager	
<b>Employee traveled to Philadelphia, Pennsylvania to attend the 2018 COGEL conference from December 9, 2018 – December 12, 2018.</b>	
<b>Cost Associated with travel:</b>	
COGEL Registration	\$600.00
Transportation (Amtrak)	205.00
Hotel (Marriott) 4 days, 3 nights	\$561.33
Per diem	\$213.50
<b>Total Expenses</b>	<b>\$1,579.83</b>

## **ATTACHMENT E**

**CHART OF FY18 AND FY19, TO DATE, INTRA-DISTRICT  
TRANSFERS AND MEMORANDA OF UNDERSTANDING  
(Response to Questions No. 5 and 8, General Questions)**

**OCF RESPONSE TO QUESTION #5 (GENERAL QUESTIONS)**  
**Office of Campaign Finance (CJ0)**

<b><i>Intra-District FY 2018 Transferred From Office of Campaign Finance (CJ0)</i></b>			
<b><i>Amount</i></b>	<b><i>From</i></b>	<b><i>To</i></b>	<b><i>Description</i></b>
\$ 13,697.34	CJ0	OCP	Purchase Card
\$ 5,799.76	CJ0	KT0	Fleet Services
\$ 15,000.00	CJ0	BE0	Personal and Resource Support
\$ 2,261.16	CJ0	TO0	Microsoft Office 365
\$ 36,628.00	CJ0	TO0	RTS
\$ 420.00	CJ0	ODR	Sign Language

<b><i>Intra District FY 2019 Transferred From Office of Campaign Finance (CJ0)</i></b>			
<b><i>Amount</i></b>	<b><i>From</i></b>	<b><i>To</i></b>	<b><i>Description</i></b>
\$ 5,997.00	CJ0	KT0	Fleet Services
\$ 11,500.26	CJ0	OCP	Purchase Card



**ATTACHMENT F**

**LIST OF OCF PURCHASE CARD SPENDING FOR  
FY18 AND FY19, TO DATE  
(Response to Question No.7, General Questions)**

## FY 18 & FY 19 P-CARD TRANSACTIONS

### FY 18 P-CARD TRANSACTIONS

Vendor	Amount	General Purpose	Date	P-Card User
District Legal Services	\$65.00	Process Server Services	10/16/2017	April Williams
Metropolitan Office Products	\$621.90	Supplies	11/07/2017	April Williams
District Legal Services	\$190.00	Process Server Services	12/19/2017	April Williams
District Legal Services	\$150.00	Process Server Services	12/19/2017	April Williams
Miller's Copying Services	\$326.40	Photocopying Services	01/17/2018	April Williams
Post Office	\$24.70	Certified Mailing	02/03/2018	April Williams
American Business Supplies	\$1,404.27	Office Supplies	02/23/2018	April Williams
COGEL	\$445.00	Membership Renewal	03/12/2018	April Williams
Shred Ace	\$1200.00	Mass Shredding	03/23/2018	April Williams
Global Print Masters	\$1274.00	Stationery	04/19/2018	April Williams
Metropolitan Office Products	\$1764.96	Office Supplies	04/19/2018	April Williams
Haines	\$463.50	Directory Book	05/31/2018	April Williams
Shred Ace	\$1050.00	Mass Shredding	05/31/2018	April Williams
Metropolitan Office Products	\$515.67	Office Supplies	05/31/2018	April Williams
USPS	\$200.00	Postage	06/12/2018	April Williams
Global Print Masters	\$298.00	Brochures	06/20/2018	April Williams
Amtrak	\$648.00	Travel	07/03/2018	April Williams
Amtrak	\$167.40	Travel	07/03/2018	April Williams
Sheraton	\$267.43	Hotel Room	07/14/2018	April Williams
Sheraton	\$267.43	Hotel Room	07/14/2018	April Williams
Sheraton	\$267.43	Hotel Room	07/14/2018	April Williams
Sheraton	\$267.43	Hotel Room	07/14/2018	April Williams
Sheraton	\$267.43	Hotel Room	07/18/2018	April Williams
Metropolitan Office Products	\$496.56	Office Supplies	08/15/2018	April Williams
Yakima Supplies	\$1054.83	Office Supplies	09/28/2018	April Williams

**FY 19 P-CARD TRANSACTIONS**

<b>Vendor</b>	<b>Amount</b>	<b>General Purpose</b>	<b>Date</b>	<b>P-Card User</b>
Metropolitan Office Products	\$1798.93	Office Supplies	11/07/2018	April Williams
COGEL	\$3000.00	Membership Renewal	11/14/2018	April Williams
Amtrak	\$512.00	Travel	11/19/2018	April Williams
Amtrak	\$410.00	Travel	11/19/2018	April Williams
Amtrak	\$224.00	Travel	11/21/2018	April Williams
Global Print Masters	\$2046.00	Stationery	12/07/2018	April Williams
District Legal Services	\$477.50	Process Server Services	12/10/2018	April Williams
Comcast	\$174.46	Cable Services	12/11/2018	April Williams
Amtrak	\$48.00	Charge Back	12/12/2018	April Williams
Marriott	\$578.33	Hotel Room	12/14/2018	April Williams
Marriott	\$561.33	Hotel Room	12/14/2018	April Williams
Marriott	\$587.33	Hotel Room	12/14/2018	April Williams
Marriott	\$561.33	Hotel Room	12/14/2018	April Williams
Marriott	\$617.05	Hotel Room	12/14/2018	April Williams
Comcast	\$160.53	Cable Services	01/16/2019	April Williams

## **ATTACHMENT G**

### **CHART OF OCF FY18 AND FY19, TO DATE, REPROGRAMMING**

(Response to Question 11, General Questions)

**FY18 and FY19, to date, Reprogramming  
Office of Campaign Finance (CJ0)**

**FY2018 Reprogramming**

<b>Date</b>	<b>From</b>	<b>Amount</b>	<b>TO</b>	<b>Amount</b>	<b>DESCRIPTION</b>
June 19, 18	0111	123,985.00	0410	117,795.00	Audiovisual System
	0147	31,015.00	0702	37,205.00	Audiovisual System
		-			
Sept 31, 2018	0111	50,000.00	Help DGS for Spending Pressure	50,000.00	Help DGS for Spending Pressure
Total		205,000.00		205,000.00	

**FY2019 Reprogramming**

No reprogramming

## **ATTACHMENT H**

### **LIST OF OCF CONTRACTS FOR FY18 AND FY19, TO DATE**

(Response to Question No. 13, General Questions)

**FY 18 and 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**

<b>Vendor Name</b>	<b>Nature of Contract/End product/Services</b>	<b>Dollar Amount</b>	<b>Budgeted Amount</b>	<b>Actually Spent</b>	<b>Term of Contract</b>	<b>Comp Bid/ Yes/ No</b>	<b>Fund Source</b>	<b>Contract Monitor</b>
MVS PO575689	Copier Maintenance for FY18	\$8,745.84	\$8,745.84	8745.84	10/2017-09/2018	Yes	0410	Sidney Wesley Williams
DataNet System Corp. PO575944	OCF eFiling System Tech Support, Maintenance, and Enhancements (October 1, 2017 to September, 29, 2018)	\$55,476.00	\$55,476.00	\$55,476.00	10/2017-09/2018	Yes	0410	Sidney Wesley Williams
DataNet System Corp PO587365	OCF- E-Filing System Enhancements	\$26,608.50	\$26,608.50	\$26,608.50	10/12017 - 09/30/2018	Yes	0410	Sidney Wesley Williams
WASHING TON GROUP SALES, INC. PO586560	WGS-Washington Group Sales/Office Furniture	\$8,339.86	\$8,339.86	\$8,339.86	10/12017 - 09/30/2018	Yes	0410	Sidney Wesley Williams
VLI PO587387	FY18 Website Developed and Designed Audio/Visual System	\$79,289.00	\$79,289.00	\$79,289.00	10/12017 - 09/30/2018	Yes	0410	Sidney Wesley Williams

**FY 19 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**

<b>Vendor Name</b>	<b>Nature of Contract/End product/Services</b>	<b>Dollar Amount</b>	<b>Budgeted Amount</b>	<b>Actually Spent</b>	<b>Term of Contract</b>	<b>Comp Bid/ Yes/ No</b>	<b>Fund Source</b>	<b>Contract Monitor</b>
MVS <b>PO533797</b>	Copier Maintenance for FY19	\$7,395.84	\$7,395.84	\$7,395.84	10/2018-09/2019	Yes	0410	Sidney Wesley Williams
DataNet System Corp. PO595839	OCF Website and E-Filing System Maintenance FY19	\$55,312.64	\$55,312.64	\$55,312.64	10/2018-09/2019	Yes	0410	Sidney Wesley Williams



## **ATTACHMENT I**

**FY18 PERFORMANCE PLAN AND REPORT FOR THE  
OFFICE OF CAMPAIGN FINANCE  
(Response to Question No. 20, General Questions)**

## OCA: DISTRICT PERFORMANCE PLANS: (OFFICE OF CAMPAIGN FINANCE FY2018)

**Agency:** Office of Campaign Finance

**Agency Acronym:** OCF

**Agency Code:** CJ0

**Agency POCs:** Cecily Collier-Montgomery, Nadine Journiette

**Fiscal Year:** 2018

### 2018 Agency Accomplishments

3 Accomplishments			
	What is the accomplishment that your agency wants to highlight?	How did this accomplishment impact residents of DC?	How did this accomplishment impact your agency?
	Enhanced the OCF E-Filing and Disclosure System to incorporate recommendations received from the public during the FY17 Online Survey to assess the effectiveness of the System to deliver information and services. The upgrades include data download changes to create separate fields for name, address, city, state, and zip code; a new user e-filing feedback form; and the redesign of the Form 16 Loan and Debt Modules to be more user friendly.	The enhancements to the OCF E-Filing and Disclosure System will improve the public's access to data by increasing the fields for the search feature and the sort of data for download; simplify the reporting of debt and loan information on financial reports; and provide a vehicle for user feedback prior to the close of each e-filing session.	The enhancement of the OCF E-Filing and Disclosure System aids the Agency in its ongoing efforts to ensure the disclosure of accurate and complete data, the increased transparency of financial reporting, and easy access by the public to the financial information received by the Agency.
	During FY18, the Agency invited both representatives of member organizations of the D.C. Fair Elections Commission and District residents who were strong advocates of D.C. Law 22-94, the "Fair Elections Amendment Act of 2018", effective May 5, 2018, to participate in a Planning Committee organized by the OCF to develop policy recommendations in certain areas to assist with the implementation of the Fair Elections Program. The first meeting was held on July 26, 2018.	The Planning Committee offers the opportunity for private citizens and community organizations to collaborate with the Office of Campaign Finance to plan a strong foundation for the Fair Elections Program in the areas of engagement of voters through community outreach, the use of technology to provide greater transparency and disclosure of campaign operations; the administration of the debate requirement; and creating candidate services to aid with compliance.	The organization of the Planning Committee has established a critical link with the community which will assist the Office of Campaign Finance in determining how best to educate the public concerning the introduction of the public financing of campaign operations in the District of Columbia.
	Achieved 100% compliance with the legislative mandate to file all financial reports online at the OCF Web Site, and 93% compliance with the mandate for all newly registered candidates and treasurers to attend training on their responsibilities under the Campaign Finance Act.	Achieving the 93% compliance rate in the Mandatory Training Program assured District residents that the filing community participated in training which focused on their reporting requirements under the Campaign Finance Laws, and committed to comply with the Laws. The submission of financial reports online provides the public with real time access to the financial transactions reported by candidates and committees.	Achieving the 93% compliance rate with the training mandate promotes voluntary compliance with the Campaign Finance Laws as demonstrated through the 100% compliance rate achieved with the electronic filing program, and the overall 96% compliance rate achieved for the filing of financial reports by all registrants under the Campaign Finance Act.

## 2018 Strategic Objectives

5 Objectives				
	Objective Number	Strategic Objective	# of Measures	# of Operations
	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	1
	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	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	1
	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	1
	5	Create and maintain a highly efficient, transparent and responsive District government.**	1	0
TOT			8	4

## 2018 Key Performance Indicators

8 Measures																			
	Measure	New Measure/ Benchmark Year	Directionality	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2018 Qtr 1	FY 2018 Qtr 2	FY 2018 Qtr 3	FY 2018 Qtr 4	FY 2018	Was 2018 KPI Met?	Please explain any your FY2018 KPI Target?	Are Explanatio ns of to Meeting KPIs Complete
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		Up is Better	100%	100%	100%	100%	100%	100%	140.70%	100%	100%	100%	100%	100%	100%	Met		
	Percent of Interpretative Opinions issued within thirty (30) days		Up is Better	Not available	100%	100%	Not Available	100%	100%	100%	100%	No applicable incidents	100%	100%	100%	100%	Met		
	Percent of expedited advice for time-sensitive election related matters issued within fifteen (15) days of request		Up is Better	Not available	100%	Not Available	100%	100%	100%	100%	100%	100%	No applicable incidents	No applicable incidents	100%	100%	Met		
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)																			
	Percent of new candidates and treasurers who receive mandatory training		Up is Better	Not available	100%	Not Available	100%	100%	Not Available	100%	100%	100%	100%	100%	100%	100%	Met		
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		Up is Better	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	Met		
	Percent of periodic random audits conducted within sixty (60) days of initiation		Up is Better	100%	100%	100%	100%	93.80%	100%	100%	100%	100%	100%	100%	100%	100%	Met		
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)																			
	Percent of financial reports filed electronically		Up is Better	100%	100%	100%	100%	100%	100%	964%	100%	100%	100%	100%	100%	100%	Met		
5 - Create and maintain a highly efficient, transparent and responsive District government.** (1 Measure)																			
	Percent of investigative matters closed within ninety (90) days of opening		Up is Better	100%	100%	100%	Not Available	0%	100%	Waiting on Data	100%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	No applicable incidents			

\*\*We've revisited a project to standardize District wide measures for the Objective "Create and maintain a highly efficient, transparent and responsive District government." New measures will be tracked in FY18 and FY19 and published starting in the FY19 Performance Plan.

## 2018 Operations

4 Activities						
	Operations Header	Operations Title	Operations Description	Type of Operations	# of Measures	# of Strategic Initiatives
<b>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)</b>						
	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	3
TOT					3	3
<b>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)</b>						
	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
<b>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)</b>						
	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	1

TOT				2	1
<b>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)</b>					
	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 OCF 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	21
TOT				2	1
TOT				8	

## 2018 Workload Measures

8 Measures													
	Measure	New Measure/ Benchmark Year	Numerator Title	Units	FY 2014	FY 2015	FY 2016	FY 2017 Actual	FY 2018 Quarter 1	FY 2018 Quarter 2	FY 2018 Quarter 3	FY 2018 Quarter 4	FY 2018
1 - Enforcement Program(3 Measures)													
	Total number of informal hearings conducted		# of referrals for initiation of the informal hearing process	# of actual hearings required			47	83	16	7	39	21	83
	Total number of investigations completed within 90 days		# of investigations initiated	# of investigations completed within 90 days	0		Not Available	Waiting on Data	Annual Measure	Annual Measure	Annual Measure	Annual Measure	No applicable incidents
	Total number of Interpretative Opinions and Expedited Advice issued		# of requests for Interpretative Opinions and Expedited Advice received	# of Opinions and Advice issued			19	12	4	1	2	1	8
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			34	29	23	32	102	40	197
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			727	1092	220	209	183	206	818
	Total number of periodic random and full field audits completed		# of random periodic and full field audits completed by the	Total number of random periodic and full field audits initiated by			24	17	2	2	5	4	13

	by the Audit Division		Audit Division	the Audit Division.									
<b>4 - Public Information collection and dissemination online and onsite(2 Measures)</b>													
	Total number of financial reports filed electronically.		# of financial reports submitted online	# of actual financial reports submitted online			610	964	135	209	124	164	632
	Total number of financial reports filed		# of financial reports filed	# of actual financial reports submitted			610	966	135	209	124	164	632



## 2018 Initiatives

6 Strategic initiatives			
	Strategic Initiative Title	Strategic Initiative Description	Proposed Completion Date
<b>Audit Programs(1 Strategic Initiative)</b>			
	<a href="#">Desk Reviews and Audits of Financial Reports</a>	During FY 18, the Office of Campaign Finance will conduct at least four (4) periodic random audits of the financial reports of the principal campaign committees of candidates active during the 2018 Election Cycle following the December 10th, 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 Services and Statehood Fund Programs, for compliance with the reporting requirements; randomly audit the activity reports of the Constituent Service Programs and Statehood Fund Programs at the close of the October 1st and the April 1st Filing Deadlines; randomly audit the financial reports of the continuing committees at the close of the January 31st and the July 31st Filing Deadlines; and refer violations of the Campaign Finance Act to the General Counsel for enforcement.	09-30-2018
<b>Educational Outreach Services(1 Strategic Initiative)</b>			
	<a href="#">Mandatory and Continuing Educational Programs</a>	During FY 18, the Office of Campaign Finance will continue to schedule and conduct Mandatory Training for each candidate for public office and the treasurer of each committee within fifteen (15) days of their registration with the Agency. The Agency will conduct bi-weekly onsite training sessions, commencing January 2018 for the public, continuing committees, and the Constituent Service and Statehood Fund Programs, as well as for the candidates and committees active during the 2018 Election Cycle. The Agency will also conduct Webinars monthly at the OCF Website on the reporting requirements of the Campaign Finance laws. 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.	09-30-2018
<b>Enforcement Program(3 Strategic initiatives)</b>			
	<a href="#">Site Visits to Early Voting Centers and Election Precincts</a>	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 2018 Primary Election for local elective offices in the District of Columbia, to observe campaign activity. The OCF staff will provide counsel where necessary, concerning the application of the campaign finance laws.	09-30-2018
	<a href="#">Listing of Complaints and Final Decisions by Topic</a>	The Office of the General Counsel will research and determine the topic of each of the "Complaints and Final Decisions" listed at the Enforcement Link at the OCF Website to enable the revision of the Link to provide for a public search feature by topic.	05-31-2018
	<a href="#">Review of OCF Regulations and Forms</a>	The Office of the General Counsel will conduct a comprehensive review of the OCF Regulations, Forms, and Brochures, and where necessary, propose revisions consistent with the most recent amendments to the Campaign Finance Laws and changes in the operating procedures of the Agency.	09-30-2018
<b>Public Information collection and dissemination online and onsite(1 Strategic Initiative)</b>			
	<a href="#">Community Outreach</a>	The Office of Campaign Finance will establish a Community Outreach Program through which information on the Campaign Finance Laws and the responsibilities of the Office of Campaign Finance may be disseminated at events in the community. The Agency will coordinate with the Board of Elections to work with Civic Associations and the Office of the Advisory Neighborhood Commissions to identify events where the OCF may provide information to the public. In addition, the Office of Campaign Finance will reach out to the business community to provide training sessions on the reporting requirements of the "Business Contributor".	09-30-2018

## 2018 Initiative Updates

6 Initiative Updates								
	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	Quarters
<b>Community Outreach(1 Initiative Update)</b>								
	<a href="#">Community Outreach</a>	The Agency established a Community Outreach Program and partnered with the Board of Elections in its 2018 Voter Registration and Education Community Outreach Campaign. The goal of the Community Outreach Program is to participate in community events to expand the audience through which information may be disseminated on the Campaign Finance Laws and the Agency's role to administer the laws. To assist in these efforts, the Agency designed a Brochure to outline the Agency's mission, scope of services, regulations, and enforcement duties. The Agency participated in five (5) events throughout the City. The Agency scheduled onsite training sessions to focus on the "Business Contributor" reporting requirements, and designed a Business Contributor Training Tutorial for view at the OCF Website.	Complete		Demonstrable	The increased efforts of the Agency to inform and educate the public concerning the Campaign Finance Laws and the role of the Agency in the administration of these Laws strengthens the public's confidence in the integrity of the election process, public office, and the ability of this Agency to enforce the Laws where violated.		Q4
<b>Desk Reviews and Audits of Financial Reports(1 Initiative Update)</b>								
	<a href="#">Desk Reviews and Audits of Financial Reports</a>	During FY18, the Agency completed twenty-one (21) Periodic Audit Reports of candidates active in the 2018 Election Cycle, Political Action Committees, and the Constituent Services Program. The Audit Branch conducted 844 Desk Reviews of the	Complete		Demonstrable	The audit process requires reporting entities to submit all banking records and statements, invoices, and receipts maintained in support of the financial transactions stated on the Reports filed with the Agency. The audits enable the OCF to verify report entries against the		Q4

		Financial Reports filed with the Agency; issued 238 Requests for Additional Information and resolved 206 of these matters, with 20 responses due in FY19; recommended 19 Committees for termination upon the approval of their Final Accounts; and referred 20 matters to the Office of the General Counsel for enforcement.				supporting documentation, which ensures that the public record provides a full and accurate portrayal of the financial operations of the campaigns and committees, and the Constituent Services Program.		
<b>Listing of Complaints and Final Decisions by Topic(1 Initiative Update)</b>								
	<a href="#">Listing of Complaints and Final Decisions by Topic</a>	The Office of the General Counsel identified the subject matter of each of the "Complaints and Final Decisions" listed at the Enforcement Link at the OCF Website from Calendar Years 2000 through 2018 to enable the revision of the Link to provide for a public search feature by topic.	Complete		Demonstrable	The revision of the "Complaints and Final Decisions" Link at the OCF Website to include a search feature by topic will provide a more user friendly resource for the public relative to the location and application of the Campaign Finance Laws by the Agency in specific types of investigative matters.		Q4
<b>Mandatory and Continuing Educational Programs(1 Initiative Update)</b>								
	<a href="#">Mandatory and Continuing Educational Programs</a>	During FY18, the OCF achieved a 93% compliance rate with the mandate for new candidates and treasurers to attend training on their responsibilities and duties under the Campaign Finance Laws. Each of the 197 candidates and treasurers who registered during FY18 attended the training and swore or affirmed to follow the Campaign Finance Laws. The Agency also developed a Power Point Presentation for use in the Mandatory Entrance Conferences.	Complete		Demonstrable	The 93% compliance rate assured District residents of the participation of the filing community in training to address their obligations under the Campaign Finance Laws, and their commitment to comply with those laws. The 93% compliance rate promotes voluntary compliance as demonstrated by the reduction in enforcement actions, and the 100% compliance with the mandate to e-file financial reports. The e-filing of reports provides real time disclosure of the financial activity of campaigns for public view at the OCF Website.		Q4
<b>Review of OCF Regulations and Forms(1 Initiative Update)</b>								
	<a href="#">Review of OCF Regulations and Forms</a>	During FY18, the Office of the General Counsel commenced the comprehensive review of the OCF Regulations, Forms, and Brochures to include the provisions and reflect the changes arising from the Fair	Complete		Demonstrable	The revised Regulations place the Board's Regulations into conformity with recent amendments to the Campaign Finance Act.		Q4

		Elections Amendment Act of 2018, effective May 5, 2018, and applicable November 7, 2018. The Agency proposed the Notice of Emergency and Proposed Rulemaking to the Board of Elections for adoption on September 5, 2018 to increase the expenditure limits for the Constituent Service Programs (65 DCR 37; September 14, 2018); and proposed several revisions to conform with other recent Campaign Finance Reform legislation which established contribution limits and increased reporting for political action committees (64 DCR 10306; October 13, 2017).					
<b>Site Visits to Early Voting Centers and Election Precincts(1 Initiative Update)</b>							
	<a href="#">Site Visits to Early Voting Centers and Election Precincts</a>	Site visits were organized to the nine (9) Early Voting Centers on June 13, 2018 and to 87 of the Election Precincts during the June 19, 2018 Primary Election. 10 or more Precincts were inspected within each Ward. Staff provided counsel where necessary, and found that campaign signs displayed the proper identification disclaimer, and that most electioneering markers were properly placed at the appropriate distance from the Precinct entrance.	Complete		Demonstrable	The conduct of the site visits afforded the Office of Campaign Finance the opportunity to be present in the community and available to the public to answer questions, and to assist the public in understanding their obligations under the Campaign Finance Laws. Where infractions were observed, the Agency was immediately available to require the correction of same.	Q4

#### Administrative Information

#### FY Performance Plan

Office of Campaign Finance FY2018

#### Record ID#

521

#### Performance Plan ID

395

Created on Dec. 15, 2016 at 3:17 PM (EST). Last updated by [Katz, Lia \(EOM\)](#) on June 6, 2017 at 5:49 PM (EDT). Owned by [Katz, Lia \(EOM\)](#)

**ATTACHMENT J**

**FY19 PERFORMANCE PLAN FOR THE OFFICE OF  
CAMPAIGN FINANCE**

(Response to Question No. 21, General Questions)

## OCA: DISTRICT PERFORMANCE PLANS: (OFFICE OF CAMPAIGN FINANCE FY2019)

**Agency:** Office of Campaign Finance

**Agency Acronym:** OCF

**Agency Code:** CJ0

**Agency POCs:** Cecily Collier-Montgomery, Nadine Journiette

**Fiscal Year:** 2019

### 2019 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.

## 2019 Key Performance Indicators

### 10 Measures

Measure	New Measure/ Benchmark Year	Directionality	FY 2014 Actual	FY 2015 Target	FY 2015 Actual	FY 2016 Target	FY 2016 Actual	FY 2017 Target	FY 2017 Actual	FY 2018 Target	FY 2018 Actual	FY 2019 Target	FY 2019 Qtr 1
<b>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)</b>													
Percent of informal hearings conducted and closed before the next filing deadline		Up is Better	100%	100%	100%	100%	100%	100%	140.70%	100%	100%	100%	53.50%
Percent of Interpretative Opinions issued within thirty (30) days		Up is Better	Not available	100%	100%	Not Available	100%	100%	66.70%	100%	100%	100%	100%
Percent of expedited advice for time-sensitive election related matters issued within fifteen (15) days of request		Up is Better	Not available	100%	Not Available	100%	100%	100%	92.90%	100%	100%	100%	100%
<b>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)</b>													
Percent of new candidates and treasurers who receive mandatory training		Up is Better	Not available	100%	Not Available	100%	100%	100%	100%	100%	100%	100%	100%
<b>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 Measures)</b>													
Percent of financial reports reviewed, evaluated, and analyzed before the next filing deadline		Up is Better	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Percent of periodic random audits conducted within		Up is Better	100%	100%	100%	100%	93.80%	100%	100%	100%	100%	100%	100%

sixty (60) days of initiation													
Percent of Base Amount Payments distributed within five (5) business days of the certification of a candidate into the Fair Elections Program		Up is Better	Not available	Not available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	100%	Annual Measure
Percent of candidates determined to meet requirements for certification by OCF within five (5) days of filing the affidavit declaring compliance with the Fair Elections Program.		Up is Better	Not available	Not available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	Not Available	100%	Annual Measure
<b>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)</b>													
Percent of financial reports filed electronically		Up is Better	100%	100%	100%	100%	100%	100%	964%	100%	100%	100%	100%
<b>5 - Create and maintain a highly efficient, transparent and responsive District government.(1 Measure)</b>													
Percent of investigative matters closed within ninety (90) days of opening		Up is Better	100%	100%	100%	Not Available	0%	100%	Waiting on Data	100%	No applicable incidents	100%	100%



## 2019 Operations

4 Activities				
	Operations Header	Operations Title	Operations Description	Type of Operations
<b>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)</b>				
	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
<b>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)</b>				
	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
<b>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)</b>				
	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

**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 OCF 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
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## 2019 Workload Measures

8 Measures										
	Measure	New Measure/ Benchmark Year	Numerator Title	Units	FY 2014	FY 2015	FY 2016	FY 2017 Actual	FY 2018 Actual	FY 2019 Quarter 1
<b>1 - Enforcement Program(3 Measures)</b>										
	Total number of informal hearings conducted		# of referrals for initiation of the informal hearing process	# of actual hearings required			47	83	83	38
	Total number of investigations completed within 90 days		# of investigations initiated	# of investigations completed within 90 days			Not Available	Waiting on Data	No applicable incidents	1
	Total number of Interpretative Opinions and Expedited Advice issued		# of requests for Interpretative Opinions and Expedited Advice received	# of Opinions and Advice issued			19	12	8	Needs Data Update
<b>2 - Educational Outreach Services(1 Measure)</b>										
	Total number of mandatory training conferences conducted		# of new candidates and committee treasurers registered with the Agency	# of actual mandatory conferences conducted			34	29	197	4
<b>3 - Audit Programs(2 Measures)</b>										
	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			727	1092	818	383
	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.			24	17	13	4
<b>4 - Public Information collection and dissemination online and onsite(2 Measures)</b>										
	Total number of financial reports filed electronically		# of financial reports submitted online	# of actual financial reports submitted online			610	964	632	317
	Total number of financial reports filed		# of financial reports filed	# of actual financial reports submitted			610	966	508	317

## 2019 Strategic Initiatives

9 Strategic initiatives				
	Strategic Initiative Title	Strategic Initiative Description	Proposed Completion Date	Add Initiative Update
<b>Audit Programs(3 Strategic initiatives)</b>				
	<a href="#">Desk Reviews and Audits of Financial Reports</a>	The Office of Campaign Finance will review the financial reports of all registrants following each filing deadline for compliance with the reporting requirements: 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 (including the Political Action Committees and the Independent Expenditure Committees) following the January 31st and July 31st 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 random audits are ongoing audit activities.	09-30-2019	<a href="#">Add Initiative Update</a>
	<a href="#">Full Field Audits</a>	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 6, 2018 General Election by the Board of Elections. The conduct of the audit will require the selected reporting entity to submit all banking records and statements, invoices, loan documents, and receipts maintained in support of the financial 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 transactions.	09-30-2019	<a href="#">Add Initiative Update</a>
	<a href="#">New Fair Elections Audit Program</a>	The Office of Campaign Finance will develop an Audit Program unique to the requirements of D.C. Law 22-94, the "Fair Elections Amendment Act of 2018", effective May 5, 2018, to provide for the verification and full audit of the Financial Reports filed under the Fair Elections Program. The Fair Elections Act provides for the public funding of political campaigns in the District of Columbia. The Fair Elections Program is established in the Office of Campaign Finance.	01-31-2019	<a href="#">Add Initiative Update</a>
<b>Educational Outreach Services(2 Strategic initiatives)</b>				
	<a href="#">Expansion of the Educational Program to introduce the Fair Elections Program</a>	The Office of Campaign Finance will expand the OCF Educational Program to fully introduce the Fair Elections Program, established by D.C. Law 22-94, the "Fair Elections Amendment Act of 2018", effective May 5, 2018. D.C. Law 22-94 will provide for the public funding of campaign operations in the District of Columbia. The OCF will design online tutorials, brochures, and a campaign finance guide to provide clear guidance in plain language on the requirements and purpose of the new Law to the residents of the District of Columbia. The OCF will revise the Mandatory Training Program and the onsite Educational Seminars to create seminars specific to the reporting requirements, contribution limitations and prohibitions of the Fair Elections Act; and utilize the OCF Website and Social Media Platforms to disseminate continuous information on the new Program.	09-30-2019	<a href="#">Add Initiative Update</a>
	<a href="#">Obtain Greater Disclosure and Compliance through the OCF Educational</a>	The Office of Campaign Finance will conduct Mandatory training for each candidate for public office and the treasurer of each committee within fifteen (15) days of their registration with the Agency to address their obligations and responsibilities under the Campaign Finance Act and how best to	09-30-2019	<a href="#">Add Initiative Update</a>

	<a href="#">Program</a>	achieve compliance. The OCF will schedule and conduct Educational Seminars onsite monthly commencing January 2019 for the continuing committees, the Constituent Service and Statehood Fund Programs, and for the public. The OCF will circulate surveys to the training participants during each onsite seminar to determine if the presentation achieved targeted satisfaction. The Agency will continue to partner with the Board of Elections through targeted educational and community events to promote a greater understanding of the Campaign Finance Laws.		
<b>Enforcement Program(2 Strategic initiatives)</b>				
	<a href="#">Site Visits to Early Voting Centers and Election Precincts</a>	The Office of the General Counsel will organize 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 Wards during the November 6, 2018 General Election. Members of the OCF Legal and Audit Staff will be dispatched to provide counsel and guidance where necessary concerning the application of the Campaign Finance Laws.	11-06-2018	<a href="#">Add Initiative Update</a>
	<a href="#">Proposal of OCF Regulations, Forms, and Brochures</a>	The Office of the General Counsel will promulgate Regulations and draft Forms, Brochures, a Campaign Finance Guide, and Filing and Training Calendars to fully implement the requirements of D.C. Law 22-94, the "Fair Elections Amendment Act of 2018, effective May 5, 2018. D.C. Law 22-94 establishes the Fair Elections Program in the Office of Campaign Finance, and the Agency is charged with the administration of the Program.	01-31-2018	<a href="#">Add Initiative Update</a>
<b>Public Information collection and dissemination online and onsite(2 Strategic initiatives)</b>				
	<a href="#">Dissemination of Biennial Report</a>	The Office of Campaign Finance will produce and disseminate in an electronic format on January 31, 2019, the 2019 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 (2) 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.	02-01-2019	<a href="#">Add Initiative Update</a>
	<a href="#">Enhancement of the Electronic Filing System</a>	During FY 2019, the Office of Campaign Finance will develop the OCF E-filing and Disclosure System to provide an application for the online submission of financial reports from candidates seeking certification in, and participating in the Fair Elections Program; and to create reports of data easy for the public to sort, search, and download from the OCF Database. The Office of Campaign Finance will also create a new link at the OCF Website dedicated solely to the Fair Elections Program from which information will be readily available. By virtue of D.C. Law 22-94, the "Fair Elections Amendment Act of 2018", effective May 5, 2018, public funding will be made available for campaign operations in the District of Columbia. The Fair Elections Program is established in the Office of Campaign Finance.	09-30-2019	<a href="#">Add Initiative Update</a>

## 2019 Initiatives Update

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	FY19 Reporting Quarter
No initiative updates found							

## Internal: Unfinished 2018 Initiatives

This year, the OCA is requesting updates on any unfinished initiatives from FY18. Updates will not be published, but will be used to report progress to the City Administrator and the Mayor as needed.

## Strategic Initiatives

1 Strategic Initiative								
	Title	Description	Complete to Date	Status Update	Explanation	Anticipated Completion Date	Add Initiative Update - Rolled Over Initiatives	Needs Initiative Update - Rolled Over Initiatives - Notification
TRAINING AND DEVELOPMENT(1 Strategic Initiative)								

## Int: Unfinished 2018 Initiative Updates

Strategic Initiative Title	Anticipated completion date	New initiative created for FY19	No Longer an Initiative	Initiative Status Update	% Complete to date	Confidence in completion by anticipated completion date?	Status of Impact	Explanation of Impact	Supporting Data	FY19 Reporting Quarter
No initiative updates found										

## 2019 Capital Projects

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Capital projects - performance plans links

Project Number	Project Title	Owner Agency Acronym	Implementing Agency Acronym	Milestone Description	Fiscal Year Allotment
No capital projects - performance plans links found					

[Operating Budget](#)

Administrative Information

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**FY Performance Plan**

Office of Campaign Finance FY2019

**Record ID#**

659

**Performance Plan ID**

659

**ATTACHMENT K**

**COPY OF E-MAIL DATED JANUARY 31, 2019 PROVIDING  
LINKS TO THE OCF 2019 BIENNIAL REPORT  
(Response to Question No. 23, General Questions)**



# Links to the OCF Biennial Report

2019 Office of Campaign Finance Biennial Report - Message (HTML)

File Message

Ignore X Reply Reply All Forward Meeting  
Junk Delete Delete Respond Quick Steps Move Move Actions Assign Policy Mark Unread Categorize Follow Up Translate Select Zoom Zoom

You forwarded this message on 2/4/2019 5:27 PM.

From: Williams, Wesley (OCF) Sent: Thu 1/31/2019 5:26 PM  
To:  
Cc:  
Bcc: 'kmcduffie@dccouncil.us'; Mendelson, Phil (COUNCIL); 'abonds@dccouncil.us'; 'dgrosso@dccouncil.us'; 'esilverman@dccouncil.us'; 'rwwhite@dccouncil.us'; 'bnadeau@dccouncil.us'; 'jevans@dccouncil.us'; Cheh, Mary (COUNCIL); Todd, Brandon (COUNCIL); Allen, Charles (COUNCIL); 'vgray@dccouncil.us'; 'twwhite@dccouncil.us'  
Subject: 2019 Office of Campaign Finance Biennial Report

Good Evening,

Below you will find the links to the 2019 Biennial Report for the Office of Campaign Finance. By statute, this report is required to be made available to the Mayor, Council and general public. The reports summarize the receipts and expenditures of candidates for public office and political committees during the two year period prior to 2019. The documents contained in the report include details for the coverage period, the dollar amount and percentages associated with receipts by donor type and amount, and expenditures by various categories.

**DC OFFICE OF CAMPAIGN FINANCE**  
**Biennial Reports – 2019**

Intro - [http://ocfnet.datanetusa.com/2019/Biennial\\_introduction\\_2019.pdf](http://ocfnet.datanetusa.com/2019/Biennial_introduction_2019.pdf)  
PCC - [http://ocfnet.datanetusa.com/2019/pcc\\_biennialreport\\_final.pdf](http://ocfnet.datanetusa.com/2019/pcc_biennialreport_final.pdf)  
PAC - [http://ocfnet.datanetusa.com/2019/pac\\_biennialreport\\_final.pdf](http://ocfnet.datanetusa.com/2019/pac_biennialreport_final.pdf)  
EXP - [http://ocfnet.datanetusa.com/2019/exp\\_biennialreport\\_final.pdf](http://ocfnet.datanetusa.com/2019/exp_biennialreport_final.pdf)  
IEC - [http://ocfnet.datanetusa.com/2019/IEC\\_biennialreport\\_final.pdf](http://ocfnet.datanetusa.com/2019/IEC_biennialreport_final.pdf)

Regards,

Wesley Williams  
Public Affairs Manager  
D.C. Office of Campaign Finance  
1015 Half Street, SE, Suite 775  
Washington, D.C. 20003  
(202) 671-0551

See more about: Williams, Wesley (OCF).

12:07 PM

**ATTACHMENT L**

**LIST OF OCF EMPLOYEES WHOSE SALARIES EXCEEDED \$100,000  
OR MORE IN FY18 AND FY19, TO DATE  
(Response to Question No.24, General Questions)**

**Employees whose salaries exceed \$100,000 or more in FY17 and FY18, to date**

**FY 18**

<b>Employee Name</b>	<b>Position Number</b>	<b>Title</b>	<b>Program Number</b>	<b>Activity Number</b>	<b>Salary</b>	<b>Fringe Benefits</b>	<b>Overtime/Bonus</b>
Cecily E. Collier-Montgomery	00020745	DIRECTOR			\$ 172,870.27	\$39,527.29	N/A
Williams Sanford	00016330	General Counsel			\$ 131,537.02	\$30,121.97	N/A
Renee Rollins	00021921	Audit Manager			\$119,589.82	\$27,386.06	N/A
Erick Jackson	00077038	Auditor			\$ 114,865.30	\$26,304.15	N/A
Austin Franklin	00077036	Attorney Advisor			\$101,241.00	\$23,184.18	N/A

**FY 19**

<b>Employee Name</b>	<b>Position Number</b>	<b>Title</b>	<b>Program Number</b>	<b>Activity Number</b>	<b>Salary</b>	<b>Fringe Benefits</b>	<b>Overtime/Bonus</b>
Cecily E. Collier-Montgomery	00020745	DIRECTOR			\$ 181,617.51	\$42,316.00	N/A
Williams Sanford	00016330	General Counsel			\$ 138,192.79	\$32,198.92	N/A
Renee Rollins	00021921	Audit Manager			\$ 125,641.07	\$29,274.37	N/A
Erick Jackson	00077038	Auditor			\$125,642.00	\$29,274.59	N/A
Sidney W. Williams	00007568	Public Affairs Manager			\$104,700.88		N/A
Franklin, Austin	00024372	Attorney Advisor			\$106,364.00	24,782.81	N/A

**ATTACHMENT M**

**LIST OF OCF FY18 AND FY19, TO DATE,  
FINE PAYMENTS COLLECTED**  
(Response to Question No.45, Agency Operations)

## List of FY 18 & FY 19 Fine Payments Collected

### FY 2018 Fines

NAME	DATE	DOCKET #	CHECK #	AMOUNT
Andrew Kline/ D.C. Chamber of Commerce PAC	11/22/2017	16P-030	1847	\$1,000.00
Aaron Holmes/Holmes for Ward 8	11/22/2017	16C-070	23876026367	\$250.00
Andrew Kline/ D.C. Chamber of Commerce PAC	01/02/2018	16P-030/17P-001	1854	\$2,950.00
JT Real Estate I, LLC (Jeffrey Thompson)	01/09/2018	OCF FI 2013-015	1670008710	\$50,000.00
Jeffery Thompson	01/22/2018	OCF FI 2013-015	720	\$1500.00
Andrew Franklin (Drew for DC)	01/23/2018	2017 C-013	2478217736	\$200.00
Rickey Williams (ANC Candidate)	02/20/2018	15A-025	1126	\$75.00
Karl Racine 2018 (Karl Racine for AG)	02/20/2018	2017 R-006	1018	\$5,000.00
Jeffrey Thompson	02/21/2018	OCF FI 2013-015	725	\$1,500.00
Jeffrey Thompson	02/21/2018	OCF FI 2013-015	739	\$1,500.00
Angel Alston	04/11/2018	OCF 17A-004	634	\$50.00
Jeffrey Thompson	04/24/2018	OCF #17A-004	752	\$1,500.00
Thomas E. Smith	05/04/2018	OCF #17A-014	25014168281	\$50.00
Jeffrey Thompson	06/22/2018	OCF FI 2013-015	104	\$1,500.00
Jeffrey Thompson	07/25/2018	OCF FI 2013-015	101	\$1,500.00
Jeffrey Thompson	04/24/2018	OCF FI 2013-015	102	\$1,500.00
Jacques Patterson	08/14/2018	Various	4101	\$500.00
Jeffrey Thompson	09/07/2018	OCF FI 2013-015	124	\$1,500.00
<b>Total</b>				<b>\$72,075.00</b>

**FY 2019 Fines**

<b>NAME</b>	<b>DATE</b>	<b>DOCKET #</b>	<b>CHECK #</b>	<b>AMOUNT</b>
<b>Jeffrey Thompson</b>	10/26/2018	OCF FI 2013-015	145	\$1,500.00
<b>Shelia Bunn for Ward 8</b>	10/30/2018	17C-020 & 18C-011	3604	\$200.00
<b>Jeffrey Thompson</b>	11/28/2018	OCF FI 2013-015	136	\$1,500.00
<b>Jeffrey Thompson</b>	11/29/2018	OCF FI 2013-015	160	\$1,500.00
<b>Jeffrey Thompson</b>	01/07/2019	OCF FI 2013-015	192	\$1,500.00
<b>Jeffrey Thompson</b>	01/25/2019	OCF FI 2-13-015	211	\$1,500.00
<b>Total</b>				<b>\$7,700.00</b>