



FY 2015 Performance Accountability Report Office of Campaign Finance

INTRODUCTION

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

MISSION

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

SUMMARY OF SERVICES

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

OVERVIEW – AGENCY PERFORMANCE

The following section provides a summary of OCF performance in FY 2015 by listing OCF's top three accomplishments, and a summary of its progress achieving its initiatives and progress on key performance indicators.

TOP THREE ACCOMPLISHMENTS

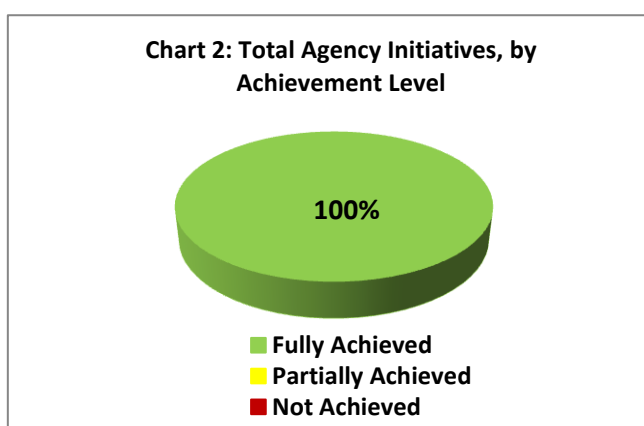
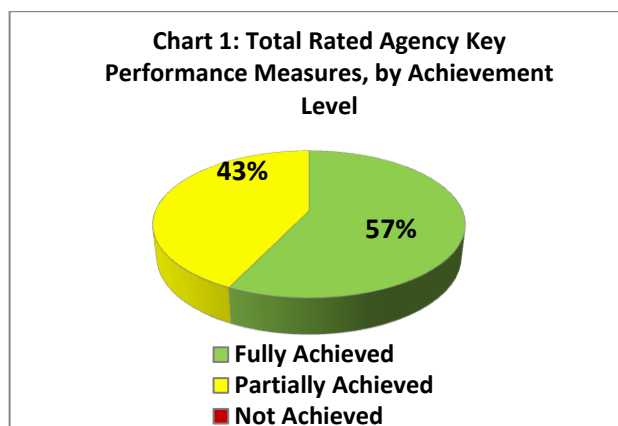
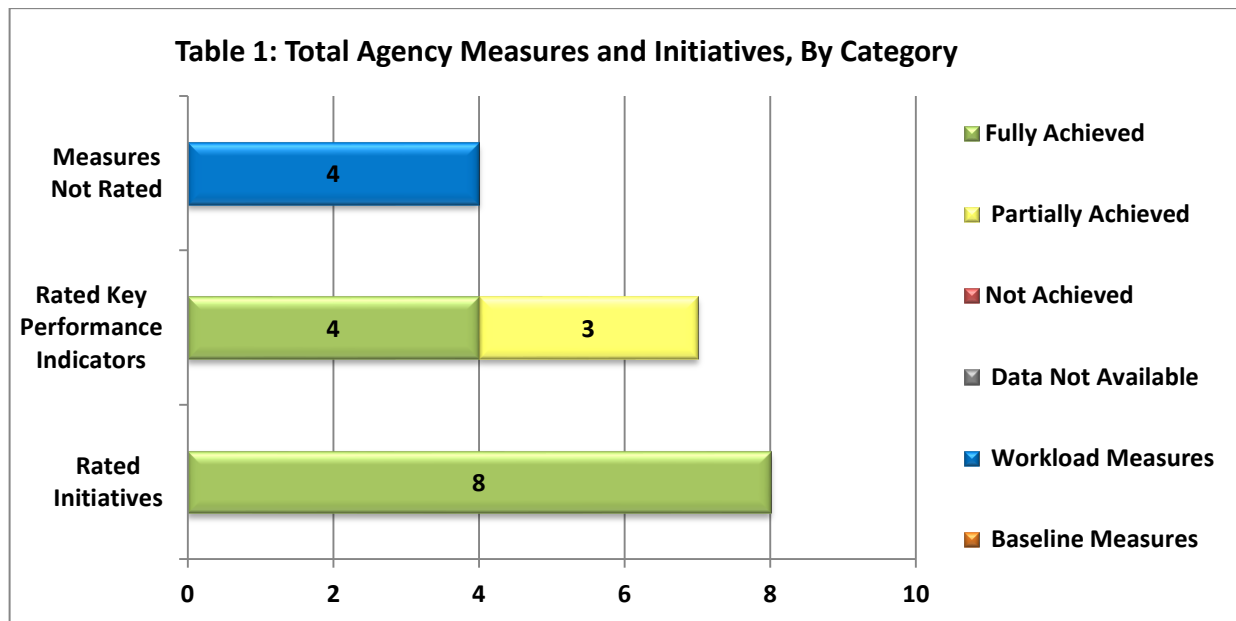
The top three accomplishments of OCF in FY 2015 are as follows:

- ✓ New OCF Web Site launched on April 15, 2015 which converted the site to a new easier web platform, updated the content, improved navigation, and provides a more citizen centric layout of information with a contemporary look and feel.
- ✓ Produced and disseminated the OCF 2015 Contribution and Expenditure Biennial Report on February 2, 2015 to the Mayor and the Council of the District of Columbia, and to the public, at the OCF Web Site and the D.C. Public Library.
- ✓ Drafted comprehensive Regulations to fully implement the "Campaign Finance Reform and Transparency Act of 2013", and to amend Chapters 30 -41, Title 3, "Elections and Ethics", of the District of Columbia Municipal Regulations.



SUMMARY OF PROGRESS TOWARD COMPLETING FY 2015 INITIATIVES AND PROGRESS ON KEY PERFORMANCE INDICATORS

Table 1 (see below) shows the overall progress the OCF made on completing its initiatives, and how overall progress is being made on achieving the agency's objectives, as measured by their key performance indicators.



In FY 2015, OCF fully achieved all of its initiatives and nearly 60 percent of its rated key performance measures. **Table 1** provides a breakdown of the total number of performance metrics OCF uses, including key performance indicators and workload measures, initiatives, and whether or not some of those items were achieved, partially achieved or not achieved. **Chart 1** displays the overall progress being made on achieving OCF objectives, as measured by their rated key performance indicators. Please note that chart 2 contains only rated performance measures. Rated performance measures do not include measures where data is not available, workload measures or baseline measures. **Chart 2** displays the overall progress OCF made on completing its initiatives, by level of achievement.

The next sections provide greater detail on the specific metrics and initiatives for OCF in FY 2015.



PERFORMANCE INITIATIVES – ASSESSMENT DETAILS

Oversight Support Services

OBJECTIVE 1: Obtain full and complete disclosure of documents and actions relevant to the Campaign Finance Act through efficient and effective educational, audit, and enforcement processes.

INITIATIVE 1.1: Expand the OCF Educational Program to obtain full disclosure and increase voluntary compliance.

Performance Assessment Key:

- During FY 2015, the Office of Campaign Finance revised and published at the OCF Web Site on February 3, 2015, the OCF Educational Brochures, the 2015 Campaign Finance Guide, and the website content to conform with the most recent amendments to the Campaign Finance Act of 2011, enacted pursuant to the “Campaign Finance Reform and Transparency Act of 2013”, D.C. Law 20-79 (February 22, 2014), and applicable January 31, 2015. The online training tutorials for the e-filing of the OCF Financial Reports were also revised and will be published at the OCF Web Site during FY16. The OCF developed and introduced a Mandatory Training Program which must be attended by each candidate for public office and the treasurer of each political committee, political action committee, or independent expenditure committee, following their registration with the Agency. The training addresses the obligations and responsibilities of the new registrants under the Campaign Finance Act, and how best to achieve compliance. The Office of Campaign Finance conducted twelve (12) mandatory entrance conferences, and issued sixteen (16) Certifications of Attendance to the participants. The OCF scheduled and conducted bi-weekly training sessions, commencing December 11, 2014, through January 31, 2015 on the new amendments to the Campaign Finance Act which became applicable January 31, 2015; and from February 12, 2015 through December 10, 2015 for continuing committees, the candidates and treasurers of committees which registered to participate in the April 28, 2015 Special Election, and the 2016 Election Cycle, and for the Constituent Service and Statehood Fund Programs. The Notices of the Training on the Significant Amendments to the Campaign Finance Act of 2011 and the 2015 Schedule of Training Seminars were published at the OCF Web Site and Face Book Page on November 17, 2014, and on February 3, 2015.

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

Performance Assessment Key:

- The Office of Campaign Finance revised the Standard Operating Procedures of the Audit Division to increase the number of periodic audits conducted of the financial reports of the



principal campaign committees active during an election cycle from two (2) to four (4) audits following the October 10, March 10, and August 10 Filing Deadlines when the October 10 date falls within the seven (7) month period preceding the year in which the election is held. During FY15, the Office of Campaign Finance initiated twenty-nine (29) Periodic Random Audits and issued 27 Audit Reports of Candidates and Principal Campaign Committees active in the 2014 Election Cycle (12); Candidates and Principal Campaign Committees active in the 2015 Special Election (1); Political Action Committees (4); Continuing Committees (6); and the Constituent Services Program (4). The OCF initiated four (4) full field audits of the campaign operations of candidates newly elected to public office following the certification by the Board of Elections of the results of the November 4, 2014 General Election and the April 28, 2015 Special Election, and of one (1) Inaugural Committee. The full field audits are ongoing. During FY 2015, the Reports Analysis and Audit Division conducted 1,105 desk reviews of the financial reports of candidates and principal campaign committees, political action committees, initiative committees, inaugural committees, and the Constituent Service and Statehood Fund Programs. The desk reviews were completed before the next filing deadline of the respective reporting entity. The Audit Branch issued 332 Requests for Additional information (RFAI), and 193 auditees satisfactorily responded. The responses for 93 RFAs are due in FY16. The Audit Branch referred 46 matters to the OCF Office of the General Counsel for the initiation of the enforcement process due to the failure to respond to the RFAI. Five (5) cases were subsequently withdrawn upon compliance, and the remainder was resolved through the informal hearing process. At the close of FY 2015, there were 65 new committees (49 principal campaign committees, six (6) political action committees, one (1) exploratory committee, two (2) independent expenditure committees, one (1) inaugural committee, and six (6) initiative committees), and 127 continuing committees (70 principal campaign committees and 57 political action committees). The Audit Branch terminated twenty-three (23) committees.

The Office of Campaign Finance produced and disseminated the OCF 2015 Biennial Report of Contributions and Expenditures on February 2, 2015 for the prior two (2) year period. The Report was distributed to the Mayor and the Council of the District of Columbia, and to the public, at the OCF Web Site, and the D.C. Public Library.

INITIATIVE 1.3: Improve the enforcement process.

Performance Assessment Key:

- During FY 2015, the Office of the General Counsel organized the conduct of site visits to the Early Voting Centers operated by the Board of Elections on October 27, 2014 (4 sites) and on October 28, 2014 (4 sites) for the November 4, 2014 General Election, and on April 23, 2015 (2 sites) for the April 28, 2015 Special Election. The Office of the General Counsel also organized the conduct of site visits for the Election Precincts operated by the Board throughout the eight (8) Wards during the November 4, 2014 General Election (81 sites), and in Wards 4 and 8 during the April 28, 2015 Special Election (30 sites); and to the business offices of the principal campaign committees of four (4) of the candidates who participated in the November 2014 General Election during October 2014. The OCF staff was dispatched to observe the activity in and around the Voting Centers and the Precincts, and the financial operations and activity of



the offices of the various entities registered with the OCF. Staff provided counsel where necessary concerning the proper application of the campaign finance laws.

The Office of Campaign Finance conducted a comprehensive review and overhaul of the OCF Regulations and Forms, and proposed amendments to conform with the changes required by the “Campaign Finance Reform and Transparency Amendment Act of 2013”. The Notice of Emergency and Proposed Rulemaking was adopted by the Board of Elections on January 7, 2015, and published in the D.C. Register on January 16, 2015 (Vol. 62, No. 3). The Notice of Final Rulemaking was published on March 13, 2015 in the D.C. Register (62 DCR 3025).

In February 2015, the OCF introduced the Mandatory Training Program for new candidates and the treasurer of each newly organized political committee, political action committee, independent expenditure committee, and the Constituent Service and Statehood Fund Programs. The Program is designed to ensure compliance with the reporting requirements of the Campaign Finance Act. The conferences were coordinated by the Public Information and Records Management Division at the registration of the entity, and supported by the Audit and Legal Divisions. At the conclusion of the training, each participant was required to swear or affirm to follow the Campaign Finance Laws, and a Certification of Attendance issued. The OCF conducted 12 mandatory entrance conferences and issued 16 Certifications. Overall, the Office of the General Counsel conducted 19 Training Seminars with a total of 81 participants. The names of the 81 participants were posted at the OCF Web Site and included in the monthly statistics presented to the Board of Elections.

The Office of Campaign Finance timely resolved 258 referrals on reporting deficiencies before the next filing deadline through the informal hearing process and issued 211 Orders of the Director. The Agency filed 38 Petitions for Enforcement before the Board; conducted four (4) investigations; resolved four (4) Show Cause Proceedings and 12 requests for advice emanating from election related issues associated with the 2014 and 2015 Election Cycles; and issued two (2) Interpretative Opinions.

OBJECTIVE 2: Assimilate, maintain, and compile financial disclosure records received through electronic filing and by hard copy into an integrated, relational database.

INITIATIVE 2.1: Complete the data entry of all financial reports received by hard copy into the database before the next filing deadline.

Performance Assessment Key:

- During FY 2015, reporting entities filed 1141 financial reports electronically at the OCF Web Site, and submitted 160 paper reports. There were two (2) elections conducted by the Board of Elections in this Fiscal Year, the November 4, 2014 General Election for the Offices of Mayor, Chairman and Members of the Council, At Large (2) and from Wards 1, 3, 5, and 6, Attorney General, Delegate to the House of Representatives, U.S. Senator and Representative, Member of the State Board of Education from Wards 1, 3, 5, and 6, and Members of the



Advisory Neighborhood Commissions, and to consider Initiative No. 71, the Legalization of Marijuana; and the April 29, 2015 Special Election for the Offices of Member of the Council from Wards 4 and 8.

There were a minimum of fourteen (14) filing deadlines associated with these Elections, and the ongoing statutory filing deadlines for the continuing committees, and the Constituent Service and Statehood Fund Programs. The OCF successfully entered the 160 paper files into the unified database before the next filing deadline to ensure an accurate portrayal of campaign finance activity. The information was extracted to publish statistical reports and summary contribution and expenditure information at the OCF Web Site following the close of each filing deadline. The number of paper submissions significantly decreased after January 31, 2015, the date upon which electronic filing became mandatory, pursuant to the "Campaign Finance Reform and Transparency Amendment Act of 2013". The first filing deadline affected by this legislative mandate was the March 10, 2015 filing deadline. Thereafter, on each of the approximately seven (7) statutory filing deadlines which occurred, all of the timely filers on each date electronically filed their financial report.

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

Performance Assessment Key:

- During FY 2015, the Office of Campaign Finance fully implemented those provisions of the "Campaign Finance Reform and Transparency Amendment Act of 2013", applicable January 31, 2015, which mandate the online submission of all reports filed with the OCF, unless actual hardship in complying is demonstrated. The first statutory filing of the Report of Receipts and Expenditures affected by the mandatory online submission requirement was the March 10th, 2015 due date for the submission of the Report of Receipts and Expenditures by candidates and committees active in the 2015 Election Cycle. The OCF drafted and proposed regulations for adoption by the Board of Elections which prescribe the procedures for the electronic filing requirement and its exception. The Notice of Final Rulemaking was published in the D.C. Register on March 13, 2015 (62 DCR 3025). To notify all reporting entities of the mandatory e-filing requirement, the OCF published on November 17, 2014 at the OCF Web Site and the OCF Face Book Page, the "Notice of Significant Amendments to the Campaign Finance Act of 2011", conducted onsite training sessions from December 4, 2014 through January 31, 2015 solely dedicated to instruction on the new law, advised all newly registered candidates and committee representatives during entrance conferences conducted in December 2014 and January 2015 of the e-filing requirement, and included notice through the reminder letters issued in January 2015 under the Filer Pre-Notification Program.

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



Performance Assessment Key:

- During FY 2015, the Office of Campaign Finance upgraded the registration and e-filing modules of the OCF Electronic Filing and Disclosure System to accept the administrative registration, online filing, and real time disclosure of the financial reports of the Independent Expenditure Committee newly established under the “Campaign Finance Reform and Transparency Amendment Act of 2013”. The revised OCF Form 16, the Report of Receipts and Expenditures, and OCF Form 20, the Statement of Organization, were moved into production on February 2, 2015.

OBJECTIVE 3: Disseminate Financial Disclosure Records and Statistical Reports.

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

Performance Assessment Key:

- During FY 2015, the Office of Campaign Finance, consistent with the provisions of the “Campaign Finance Reform and Transparency Amendment Act of 2013”, upgraded the Electronic Filing and Disclosure System (the “E-Filing System”) to provide for the availability of the OCF Database via bulk download from the portal website to include all new filer types in the data download, including the political committee, the political action committee, and the independent expenditure committee. This feature was made available to members of the public at the OCF Website on February 2, 2015. In addition, the data download module was improved to provide a preview of the data to be downloaded before the user actually downloads the data.

INITIATIVE 3.2: Increase Availability of Summary Information.

Performance Assessment Key:

- During FY 2015, the OCF E-Filing and Disclosure System was enhanced to capture and offer a “Quick Stats” option. This option is a public search module which provides a quick snapshot of various statistics maintained by the OCF specific to Principal Campaign Committees for the Filing Year or date range selected, including the Total Contributions by Denomination, the Top 10 Principal Campaign Committees by Total Contributions Received, the Top 10 Principal Campaign Committees by Total Loans Received, and a list of the Recently Formed Principal Campaign Committees. Graphs are used to depict the percentage terms of the various statistics. The System has also been enhanced to provide new public search modules which list active committees and candidates, and offer a complete registrant disclosure. The “Active Committees List” lists all active committees based on the selected filer type and/or selected election year. The Search Results include the committee name, the registration date, and the totals reported for the contributions, expenditures, and loans of the committee. The “Active Candidates List” displays for the Election Year selected the candidate name, committee name, election year, party, and office. The “Registrant Disclosure Search” offers a complete disclosure of the registration of a candidate/committee, the history of their filings in the Agency, and information related to enforcement actions, complaints or audit reports involving the



registrant. The public search modules were developed in FY 2015 and moved to production on October 26, 2015.

KEY PERFORMANCE INDICATORS

	KPI	Measure	FY 2014 YE Actual	FY 2015 YE Target	FY 2015 YE Revised Target	FY 2015 YE Actual	FY 2015 YE Rating	Budget Program
	1.6	Percent of informal hearings conducted and closed before the next filing deadline.	92.31%	100%		98.8%	98.8%	
	1.1	Percent of investigative matters closed within 90 days of opening.	100%	100%		100%	100%	
	1.2	Percent of financial reports reviewed, evaluated, and analyzed before the next filing deadline.	100%	100%		100%	100%	
	2.1	Percent of financial reports filed electronically	89.96%	95%		86.77%	86.77%	
	1.3	Percent of Interpretative Opinions issued within 30 days	0%	100%		100%	100%	
	1.4	Percent of periodic	75%	100%		84.38%	84.38%	OVERSIGHT SUPPORT SERVICES





		random audits conducted of political committees following the January 31st and July 31st filing deadlines						
●	1.8	Percent of expedited advice for time-sensitive election related issues within fifteen (15) days of request.	N/A	100%		100%	100%	OVERSIGHT SUPPORT SERVICES

WORKLOAD MEASURES – APPENDIX

WORKLOAD MEASURES ●

Measure Name	FY 2013 YE Actual	FY 2014 YE Actual	FY 2015 YE Actual	Budget Program
Total number of financial reports received	1,002	565	1202	OFFICE OF THE DIRECTOR
Total number of desk reviews conducted of financial reports and financial disclosure statements	953	742	1105	
Total number of informal hearings conducted for noncompliance with the reporting requirements	113	84	117	
Total number of mandatory training	N/A	N/A	10	



conferences conducted.				
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